

Final Environmental Impact Statement

Pilchuck District Subarea Plan and Planned Action Ordinance • March 2011





CITY OF SNOHOMISH

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March 7, 2011

**Subject: City of Snohomish Pilchuck District Subarea Plan and Planned Action Ordinance
Final Environmental Impact Statement**

Dear Reader:

The City of Snohomish (City) is planning for the mixed use area adjacent to downtown and the Pilchuck River, called the Pilchuck District. The vision for the Pilchuck District is to be a lively, walkable neighborhood of shops, personal and business services, offices, single-family homes, townhouses, and multifamily homes.

The Draft EIS, and now the Final EIS, identify environmental impacts of the alternatives and ways to mitigate impacts in advance of development. The following areas are addressed: Hazardous Materials, Land Use, Aesthetics, Transportation, Cultural Resources, Stormwater, Sewer and Water, and Police, Fire, Parks and Recreation and School Services. Mitigation measures are made part of the proposed Planned Action Ordinance.

The City issued a Draft Environmental Impact Statement (Draft EIS) in October 2010. The Draft EIS analyzed the environmental impacts of future land use, transportation, and other public features in the Pilchuck District. Two alternatives were analyzed in the Draft EIS: the Proposed Alternative including adoption of a Pilchuck District Subarea Plan and associated development regulations (with a Planned Action Ordinance); and the No Action Alternative, which is a continuation of the City's current Comprehensive Plan and development regulations applicable to the study area.

The Final Environmental Impact Statement (Final EIS) completes the environmental review process by revising or clarifying portions of the analysis and responding to comments on the Draft EIS. This Final EIS will be made available to the decision makers prior to action on the Proposal.

The Draft EIS Proposed Alternative would create a land use framework and implement development, design, and street standards to establish a cohesive vision for a livable and walkable district and encourage investment in the Pilchuck District. Concepts include a more focused range of permitted land uses with emphasis on residential, office, retail, and service uses; increased residential density and building heights in targeted areas; new street standards that provide greater pedestrian safety and comfort; and revisions to parking standards.

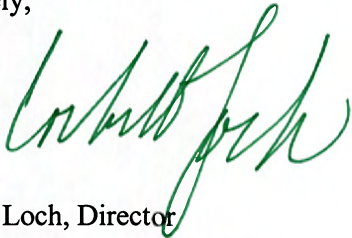
The Draft EIS Proposed Alternative also includes adoption of a Planned Action Ordinance. If adopted, the Planned Action Ordinance would indicate that the completed EIS adequately addresses significant impacts of new land development, and therefore new construction consistent with the proposed vision can be approved by the City without a redundant environmental review. This simplified permit process will protect the environment and encourage new investment.

The evaluation of a No Action Alternative is required by SEPA (State Environmental Policy Act). This alternative assumes that the Pilchuck District Subarea Plan would not be implemented and therefore the existing land use rules and regulations would continue to apply.

The Preferred Alternative studied in the Final EIS is similar to the Draft EIS Proposed Alternative and provides more detail about proposed Comprehensive Plan policy amendments, zoning and development standards, and new design standards. The Final EIS Preferred Alternative differs from the Proposed Alternative described in the Draft EIS with regarding the boundary of the townhouse district, measurement of building height, and street classifications.

Your interest in the City of Snohomish is greatly appreciated. If you would like more information about these documents and the Pilchuck District Subarea Plan, please contact Owen Dennison, Senior Planner at (360) 282-3173 or at dennison@ci.snohomish.wa.us.

Sincerely,



Corbitt Loch, Director
Planning and Community Development Department
SEPA Responsible Official
City of Snohomish

Project Title

City of Snohomish Pilchuck District Subarea Plan (with implementing development regulations) and Planned Action Ordinance

Proposal and Alternatives

The City of Snohomish (City) is planning for the mixed use area adjacent to downtown and the Pilchuck River, called the Pilchuck District. The vision for the Pilchuck District is to be a lively, walkable neighborhood of shops, personal and business services, offices, single-family homes, townhouses, and stacked flat apartments.

The City of Snohomish (City) proposes the following two related actions:

- Adopt the Pilchuck District Subarea Plan and related amendments to the City of Snohomish Comprehensive Plan (Comprehensive Plan), and adopt associated development code amendments and design standards. Comprehensive Plan amendments would include designation of the Pilchuck District as a land use designation on the Comprehensive Plan Land Use Designation Map; insertion of goals and policies describing the future vision for the Pilchuck District land use designation; amendment of existing policies to maintain internal consistency; and inclusion of policies to establish a transfer of development rights (TDR) program. Development code amendments would address the range of permitted uses, standards for building height and form, parking, subdivision, landscaping, and other land use regulations important to the implementation of the Pilchuck District Subarea Plan. Proposed integrated street standards would establish the future design of roadways and sidewalks within the Pilchuck District. Design standards would implement the subarea plan with standards addressing site and building design.
- Adopt an ordinance designating the Pilchuck District as a Planned Action for the purposes of State Environmental Policy Act (SEPA) compliance, pursuant to Revised Code of Washington (RCW) 43.21C.031(2)(a) and Washington Administrative Code (WAC) 197-11-164.

The City issued a Draft Environmental Impact Statement (Draft EIS) in October 2010. Two alternatives were analyzed in the Draft EIS: the Proposed Alternative includes adoption of a Pilchuck District Subarea Plan and Development Regulations and the Planned Action Ordinance; and the No Action Alternative, which is a continuation of the City's current Comprehensive Plan and development regulations applicable to the study area without amendment. The Final Environmental Impact Statement (Final EIS) introduces and reviews another alternative called the Final EIS Preferred Alternative, which is similar to the Proposed Alternative studied in the Draft EIS. This Final EIS will be made available to the decision makers prior to action on the Proposal.

Proposed Alternative. The Proposed Alternative would create a land use framework and implement development, design, and street standards to establish a cohesive vision for a livable and walkable district and encourage investment in the study area. Concepts include a more focused range of permitted land uses with emphasis on residential, office, retail, and service uses; increased residential density and building height in targeted areas; new street standards that provide greater pedestrian safety and comfort; and revisions to parking standards.

Under the Proposed Alternative, maximum heights in the study area would vary from 35 feet to 55+ feet (three to five stories). Floor area for any bonus story—which may be the fourth or fifth story depending on the height allowed by right—would be subject to a special review and approval process including bonus height criteria such as purchase of TDRs, structured parking, provision of special public amenities, or other requirements.

The City is also proposing to adopt a Planned Action Ordinance. If adopted pursuant to WAC 197-11-164 to 172, the Planned Action Ordinance would indicate that the completed EIS adequately addresses significant impacts of the Proposal, and that future projects consistent with the analyzed development scenarios would not require future SEPA threshold determinations or EISs.

No Action Alternative. The evaluation of a No Action Alternative is required by SEPA. This alternative assumes that the Pilchuck District Subarea Plan would not be implemented with new development regulations and that future development would not be facilitated with a Planned Action Ordinance.

Final EIS Preferred Alternative. The Final EIS Preferred Alternative is similar to the Proposed Alternative described in the Draft EIS, but provides more detail about proposed Comprehensive Plan policy amendments, form based height, setback, and other zoning standards, and design standards intending to achieve the vision of the district. Similarities of the Final EIS Preferred Alternative and Draft EIS Proposed Alternative are the overall proposed land use pattern, land capacity, form-based code zoning approach, capital improvements, and a planned action ordinance. The Final EIS Preferred Alternative differs from the Proposed Alternative with a slight variation in the neighborhood townhouse district extent, the measurement of building height, and variations on street classifications though it still proposes a similar hierarchy of street types.

Location

The study area consists of approximately 86 acres in the southeastern portion of the City of Snohomish; it generally extends from Rainier and Wood Streets on the south to about Sixth Street on the north, and from the Pilchuck River on the east to about Union Avenue on the west. The western boundary generally follows the slopes west of Cedar Avenue.

Proponent

City of Snohomish

Lead Agency

City of Snohomish

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Required Approvals

The Planning Commission will review and make recommendations regarding the Pilchuck District Subarea Plan. To implement the Proposed Alternative, the following must be approved by the Snohomish City Council:

- adoption of a final Pilchuck District Subarea Plan and associated regulations comprising amendments to the Comprehensive Plan, new zoning code amendments including new zoning designations and associated standards, new parking standards, new street standards, and new design standards; and
- adoption of a Planned Action Ordinance.

Prior to City action, the State of Washington Department of Commerce coordinated state agency review of legislative proposals.

After the City action, the likely permits to be acquired by individual development proposals include but are not limited to, land use permits, construction permits, building permits, and street use permits.

EIS Authors and Principal Contributors

This document has been prepared under the direction of the City of Snohomish Planning and Development Services Department. Key authors and topics are listed below.

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City of Snohomish Planning and Development Services Department

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(Sewer and Water)

Date of Draft EIS Issuance

October 1, 2011.

Comments were accepted through November 1, 2011. The Final EIS responds to comments received during the Draft EIS comment period. See Chapter 5.

Date of Final EIS Issuance

March 7, 2011.

Date of Implementation

Approval is anticipated in March 2011.

Previous Environmental Documents

Prior environmental review was conducted for the Comprehensive Plan and subsequent amendments, including the following documents:

- Draft Environmental Impact Statement for the 1985 City of Snohomish Community Development Plan Ten-Year Update, issued September 30, 1986,
- Final Environmental Impact Statement for the 1985 City of Snohomish Community Development Plan Ten-Year Update, issued June 23, 1987,
- Draft Environmental Impact Statement for the 1989 City of Snohomish Community Development Plan Amendments, issued May 11, 1989,
- Final Environmental Impact Statement for the 1989 City of Snohomish Community Development Plan Amendments, issued July 11, 1989,
- Draft Environmental Impact Statement for the 1991 City of Snohomish Community Development Plan Amendments, issued September 6, 1991,
- Final Environmental Impact Statement for the 1991 City of Snohomish Community Development Plan Amendments, issued February 23, 1993,
- Draft Environmental Impact Statement (EIS) for the 1995 City of Snohomish Community Development Plan Ten-Year Update, issued February 7, 1995,
- Final Environmental Impact Statement for the 1995 City of Snohomish Community Development Plan Ten-Year Update, issued March 24, 1995,
- Draft Environmental Impact Statement for the 1997 City of Snohomish Community Development Plan Amendments, issued June 30, 1997,
- Final Environmental Impact Statement for the 1997 City of Snohomish Community Development Plan Amendments, issued October 10, 1997,
- Draft Supplemental Environmental Impact Statement for the 1999 City of Snohomish Community Development Plan Amendments, issued October 11, 1999,

- Final Supplemental Environmental Impact Statement for the 1999 City of Snohomish Community Development Plan Amendments, issued December 21, 1999,
- Draft Supplemental Environmental Impact Statement for the 2000 City of Snohomish Comprehensive Plan Amendments, issued October 19, 2000,
- Final Supplemental Environmental Impact Statement for the 2000 City of Snohomish Comprehensive Plan Amendments, issued December 18, 2000,
- Draft Supplemental Environmental Impact Statement for the 2001 City of Snohomish Community Development Plan Amendments, issued October 17, 2001,
- Final Supplemental Environmental Impact Statement for the 2001 City of Snohomish Comprehensive Plan Amendments, issued November 17, 2001,
- Addendum for the 2003 City of Snohomish Comprehensive Plan Amendments, dated December 3, 2003,
- Addendum for the 2004 City of Snohomish Comprehensive Plan Update, dated December 17, 2004,
- Three Determinations of Non-Significance to adopt the 2005 City of Snohomish Comprehensive Plan Amendments, issued August 22, 2005,
- Two Determinations of Non-Significance to adopt the 2006 City of Snohomish Comprehensive Plan Amendments, issued September 18, 2006,
- Determination of Non-Significance to adopt the 2007 City of Snohomish Comprehensive Plan Amendments, issued October 25, 2007,
- Determination of Non-Significance to adopt the 2008 City of Snohomish Comprehensive Plan Amendments, issued September 15, 2008, and
- Three Determinations of Non-Significance to adopt the 2009 City of Snohomish Comprehensive Plan Amendments, issued August 2, 2009.

When appropriate, prior environmental documents were considered in the preparation of this EIS.

Location of Background Information

See Contact Person above.

Purchase of the Draft EIS

The document is posted on the City's website at http://www.ci.snohomish.wa.us/PilchuckDistrict/Pilchuck_Index.htm. The document is also available as a reference at City Hall, 116 Union Avenue and Snohomish Library, 311 Maple Avenue, Snohomish, Washington, 98290.

Copies of the compact disc can be purchased for the cost of reproduction at:

Snohomish City Hall
116 Union Avenue
Snohomish, WA 98290
(360) 568-3115

Copies of the document can be purchased for the cost of printing at:

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PILCHUCK DISTRICT SUBAREA PLAN AND PLANNED ACTION ORDINANCE FINAL ENVIRONMENTAL IMPACT STATEMENT

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Acronyms and Abbreviations

BMPs	best management practices
BNSF	Burlington Northern Santa Fe
City	City of Snohomish
City Council	Snohomish City Council
Comprehensive Plan	City of Snohomish's Comprehensive Plan
CPTED	crime prevention through environmental design
gpm	gallons per minute
LOS	level of service
MTCA	Model Toxics Control Act
NRHP	National Register of Historic Places
RCW	Revised Code of Washington
SEPA	State Environmental Policy Act
SMC	Seattle Municipal Code
TAZs	transportation analysis zones
TDR	transfer of development rights
UGA	urban growth area
WAC	Washington Administrative Code
WSDOT	Washington State Department of Transportation

1.1 Introduction

The City of Snohomish (City) proposes the following two related actions:

- Adopt the Pilchuck District Subarea Plan and related amendments to the City of Snohomish Comprehensive Plan (Comprehensive Plan), and adopt associated development code amendments and design standards. Comprehensive Plan amendments would include designation of the Pilchuck District as a land use designation on the Comprehensive Plan Land Use Designation Map; insertion of goals and policies describing the future vision for the Pilchuck District land use designation; amendment of existing policies to maintain internal consistency; and inclusion of policies to establish a transfer of development rights (TDR) program. Development code amendments would address the range of permitted uses, standards for building height and form, parking, subdivision, landscaping, and other land use regulations important to the implementation of the Pilchuck District Subarea Plan. Proposed integrated street standards would establish the future design of roadways and sidewalks within the Pilchuck District. Design standards would implement the subarea plan with standards addressing site and building design.
- Adopt an ordinance designating the Pilchuck District as a Planned Action for the purposes of State Environmental Policy Act (SEPA) compliance, pursuant to Revised Code of Washington (RCW) 43.21C.031(2)(a) and Washington Administrative Code (WAC) 197-11-164.

1.2 Proposal Objectives

The City's objectives for the Pilchuck District are described in the draft framework goals (City of Snohomish 2010a). These proposed goal statements have been reviewed by the Planning Commission and the City Council, but are not yet adopted. The EIS alternatives are analyzed in the context of these goals:

1. Foster a walkable district with a focus on the Centennial Trail as the centerpiece.
2. Encourage a network of public and private open spaces.
3. Encourage investment in the Pilchuck District.
4. Encourage higher density residential development in appropriate places.
5. Promote a residential neighborhood character with allowances for office, retail, and service uses in areas outside of the Second Street corridor.
6. Maintain a primarily commercial character and predominantly commercial land use within the Second Street corridor.
7. Create opportunities for visual or physical access to the Pilchuck River where the environmental sensitivity of the riparian area is protected and property rights are respected.

8. Foster development of a distinctive, generally urban, and uniquely Snohomish place through design standards.
9. Encourage preservation of historic structures where appropriate.
10. Encourage sustainable development practices.
11. Encourage new development to orient to public spaces, such as public sidewalks, public parks, the Centennial Trail, and the Pilchuck River.
12. Encourage retention of existing single-family land uses where appropriate.

A programmatic objective is to create a transfer of development rights (TDR) program, which will include both the policies and procedures to allow TDRs to be purchased and placed in the Pilchuck District. Purchased development rights would be redeemed for an additional increment of height, floor area, or other development standard above the base entitlement in the development regulations. However, all excess development rights obtained through a TDR program will be within the development levels studied in this EIS.

Through this EIS process, the City has identified the following objectives for the Planned Action designation:

- Provide a streamlined SEPA review process for future site-specific development proposals.
- Provide an incentive for development proposals that are consistent with the overall intent of the Pilchuck District vision.
- Provide greater certainty to potential developers, City decision makers, and the general public regarding the future development pattern and likely impacts of future development in the Pilchuck District.

1.3 Location

The study area consists of approximately 86 acres in the southeastern portion of the City; it generally extends from Rainier and Wood Streets on the south to about Sixth Street on the north, and from the Pilchuck River on the east to about Union Avenue on the west. The western boundary generally follows the slopes west of Cedar Avenue.

1.4 Description of Alternatives

Two primary alternatives representing “bookends” for a range of possible growth levels and locations in the study area were studied in the Draft EIS. The Final EIS introduces a preferred alternative as a modification to the Draft EIS Proposed Alternative. The Final EIS Preferred Alternative proposes similar land uses, and similar development and design regulations as the Proposed Alternative.

1.4.1 Proposed Alternative

The Proposed Alternative would include Comprehensive Plan and regulatory amendments to implement the objectives listed above.

The Proposed Alternative would create a land use framework and implementing development, design, and street standards to establish a cohesive vision for a livable and walkable district and to encourage investment in the study area. Concepts include a more focused range of permitted land uses with emphasis on residential, office, retail, and service uses; increased residential density in targeted areas; new street standards that provide for greater pedestrian safety and comfort; and revisions to parking standards.

Under the Proposed Alternative, maximum heights in the study area would vary from 35 to 55 feet (three to five stories). Floor area for any bonus story, which may be the fourth or fifth story depending on the height allowed by right, would be subject to a special review process and excess height criteria such as purchase of TDRs, structured parking, provision of open space, or other requirements.

The City is also proposing to adopt a Planned Action Ordinance. A Planned Action Ordinance, if adopted pursuant to WAC 197-11-164 to 172, would indicate that the completed EIS adequately addresses significant impacts of the proposal, and that future projects consistent with the analyzed projects and parameters of the Planned Action Ordinance would not require future SEPA threshold determinations or EISs.

1.4.2 No Action Alternative

The No Action Alternative would retain the current Comprehensive Plan and development regulations. Development would continue as currently permitted, with a wide range of permitted uses. The SEPA review process would not be streamlined via a Planned Action Ordinance; standard review would be required on a per-project basis.

1.4.3 Final EIS Preferred Alternative

The Final EIS Preferred Alternative proposes similar land uses, and similar development and design regulations as the Proposed Alternative. The Proposed Alternative allowed the City to consider an alternative growth pattern to the No Action Alternative and through public comment opportunities the Final EIS Preferred Alternative was developed responding to the community dialogue. Specific to the Pilchuck District and within the Proposed Alternative's Draft Subarea Plan Framework Elements (Draft EIS Appendix D), the Final EIS Preferred Alternative provides more details about proposed Comprehensive Plan policy amendments, form based height, setback, and other zoning standards, and design standards (Final EIS, Appendices A through C) intending to achieve the vision of a lively, walkable neighborhood of shops, personal and business services, offices, single-family homes, townhouses, and stacked flat apartments.

Similarities of the Preferred and Proposed Alternatives are the overall proposed land use pattern, land capacity, form-based code zoning approach, capital improvements, and a planned action ordinance. The Final EIS Preferred Alternative differs from the Proposed Alternative with a slight variation in the neighborhood townhouse district extent, the measurement of building height, and variations on street classifications though still proposing a similar hierarchy of street types.

The measurement of height in the Final EIS Preferred Alternative is based on the number of stories rather than a specific linear measurement as assumed in the Proposed Alternative. Maximum achievable building height, assuming maximum permitted height for each story in a five story building, would be 81 feet.

1.5 Summary of Potential Impacts and Mitigation Measures

Table 1-1 summarizes the environmental impacts and key mitigation measures for each element of the environment. The summary focuses on the No Action Alternative and Proposed Alternative. For a complete discussion of the elements of the environment considered in the Draft EIS please refer to Chapter 3 of the Draft EIS. In addition, the list of mitigation measures focuses on Incorporated Plan Features and Other Potential Mitigation Measures. For a review of Applicable Regulations and Commitments, see Chapter 3 of the Draft EIS.

For reference, clarifications or corrections to the Draft EIS summary analysis as a result of the Final EIS responses to comments are shown in track changes in Table 1-1.

Table 1-1. Summary of Potential Impacts of Proposed Alternative and No Action Alternative

Final EIS Preferred Alternative	Proposed Alternative	No Action Alternative
3.1 Hazardous Materials		
<p>Impacts Common to All Alternatives</p> <p>Since much of the study area is currently developed, most of the impacts related to hazardous substances would result from redevelopment activities for both the Proposed Alternative and No Action Alternative <u>all alternatives</u>. Future redevelopment, whether under current (No Action Alternative) or future land use and zoning regulations (Proposed Alternative <u>and Final EIS Preferred Alternative</u>) would be allowed.</p> <p>Ground-disturbing activities during construction such as grading, excavation, and/or placement of structures or structure supports sub-grade could disturb known or unknown contaminated areas. If contaminated areas are disturbed, workers, soil, groundwater, and/or surface water could be affected by exposing workers to contamination, spreading contaminants to clean soil, or create a pathway for contaminated soil to travel to groundwater or nearby surface water.</p> <p>Demolition of current structures during redevelopment activities could pose a risk of exposure to workers from asbestos-containing materials (ACM) or lead-based paint, depending on the age of the structure.</p> <p>During construction activities, contractors may use and store a variety of hazardous materials that could cause problems if they were spilled (i.e., fuel, cleaning solvents, and paint). Impacts resulting from a spill could be exposure of workers to hazardous materials and soil, groundwater, and/or surface water contamination from uncontrolled hazardous materials.</p>		
<p><u>Similar to the Proposed Alternative. Ground-disturbing activities (excavation and grading) associated with redevelopment can increase the exposure of workers to hazardous materials and spread of contamination into clean soil and groundwater. A slight reduction of lot coverage (impervious surface) standards of the Final EIS Preferred Alternative when compared with the Proposed Alternative—reduced from up-to 100% to up-to 90% of the site area—may reduce the overall amount of ground-disturbing activities at redevelopment sites ; thereby slightly reducing the potential to spread contamination and expose construction workers.</u></p>	<p>The Proposed Alternative would increase the extent to which redevelopment occurs within the study area compared to the No Action Alternative, and thus could within a comparable timeframe, increase site disturbance as land is cleared and rebuilt. The proposed changes in zoning and design standards within the Proposed Alternative would make structured parking more financially feasible, and such parking could be located below grade rather than at or above existing grade. However, such structured and below-grade parking is currently allowed within the Pilchuck District; therefore, the potential for encountering contaminated soils may not change.</p>	<p>Development and redevelopment in the study area is possible under the No Action Alternative. Impacts to soil and groundwater described for the Proposed Alternative could occur under the No Action Alternative; however, the amount of development and redevelopment would likely be lower; thereby decreasing the overall amount of impacts from contaminants in the study area.</p>

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p><u>Similar to the Proposed Alternative. A slight reduction of lot coverage (impervious surface) standards of the Final EIS Preferred Alternative when compared with the Proposed Alternative—reduced from up-to 100% to up-to 90% of the site area—may reduce the overall amount of ground disturbing activities at re-development sites ; thereby slightly reducing the potential to spread contamination and expose construction workers.</u></p>	<p>To the degree that increased amounts of soil excavation may occur (relative to the No Action alternative), increased excavation activities could spread contamination into clean soil and groundwater. With increased excavation activities, the potential for workers’ exposure to hazardous materials during construction activities is higher.</p>	<p>Exposure to workers during ground disturbing construction activities would still be present in the No Action Alternative; however, a decrease in the amount of construction activities would decrease the overall amount of potential exposure.</p>
<p><u>Similar to the Proposed Alternative, increasing building heights could reduce the horizontal footprint of the structure (i.e., building up rather than out), thereby reducing the impact of ground-disturbing activities and reducing the potential to encounter contaminated soil.</u></p>	<p>The proposed streetscape plan within the Proposed Alternative calls for wide sidewalks for pedestrians. The increase of paved surfaces could require additional ground-disturbing activities such as grading and excavation compared to the No Action Alternative. Increased excavation or grading could increase the exposure to workers during construction activities. Since groundwater is not likely to be encountered in grading and minimal excavation likely required for street and sidewalk improvements, impacts on groundwater should be minimal.</p>	<p>The No Action Alternative does not propose any changes to streets and sidewalks.</p>

Mitigation Measures

Mitigation measures are recommended to help reduce impacts to workers and the environment because of hazardous materials storage and use within the study area.

The Proposed Alternative includes a revision to current development standards to increase structure height restrictions from the current 35 feet to a range of 35 to 55 feet. Maximum building height under the Final EIS Preferred Alternative would be five stories, consistent with the Proposed Alternative. By allowing an increase in the height of a structure, it could reduce the horizontal footprint of the structure (i.e., building up rather than out), thereby, reducing the impact of ground-disturbing activities and reducing the potential to encounter contaminated soil (i.e., worker exposure, cross cross-contamination of soil and groundwater).

Any development activity shall comply with all federal and state laws, regulations, and policies governing the use and storage of hazardous materials and the investigation, disposal, handling, and liability associated with hazardous wastes and contaminated sites.

The following mitigation measures can help reduce the impacts related to hazardous materials during future construction. Not all of the following would necessarily apply to all construction projects:
 Encountering unreported spills or unreported underground fuel tanks is a risk when performing construction in an urban setting. Construction contractors should be required to provide hazardous materials awareness training to all grading and excavation crews on how to identify any

Final EIS Preferred Alternative	Proposed Alternative	No Action Alternative
<p>suspected contaminated soil or groundwater, and how to alert supervisors in the event of suspected contaminated material. Methods to identify potential contaminated soil would include stained soil, odors, oily sheen, or the presence of debris.</p> <p>Contractors should be required to implement a contingency plan to identify, segregate, and dispose of hazardous waste in full accordance with the Model Toxics Control Act (MTCA).</p> <p>Contractors should implement the Stormwater Pollution Prevention Plan, best management practices (BMPs), and other permit conditions to minimize the potential for a release of hazardous materials to soil, groundwater or surface water during construction.</p> <p>All ACM and lead-based paint should be identified in structures prior to demolition activities. If ACM or lead-based paint is identified, appropriately trained and licensed personnel should contain, remove, and properly dispose of the ACM and/or lead-based paint material according to federal and state regulations prior to demolition of the affected area.</p>		
<p>Section 3.1 of the DEIS has identified a list of contaminated or likely contaminated sites. Prior to acquisition of any potentially contaminated property, necessary due diligence should be performed to identify the presence and extent of soil or groundwater contamination or structures that contain ACM or lead-based paint on the property.</p> <p>Applicants for development on properties identified as having potential for contamination shall conduct a thorough site assessment. If contamination is discovered then the applicant shall comply with all state and federal regulations for contaminated sites.</p>		
<p>3.2 Land Use Patterns/Plans and Policies</p>		
<p>Impacts Common to All Alternatives</p> <p>Both of the Proposed Alternative and the No Action Alternative All alternatives would result in changes in land use conditions in the study area. The study area is anticipated to experience growth under both alternatives, including the conversion of some single-family dwellings to multifamily or commercial uses. The study area would continue to host a mix of residential and commercial development and public uses, arranged along the Centennial Trail.</p> <p>Current and proposed land use regulations have the potential to alter the pattern of land uses in the study area as new development occurs or old properties redevelop in accordance with the regulations.</p>		

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p><u>The Final EIS Preferred Alternative would foster a similar mix of land uses as the Draft EIS Proposed Alternative, focusing on the creation of a walkable “urban village” that includes a variety of residential types, mixed-use commercial establishments, and office buildings. Rather than implementing a set of new comprehensive plan land use designations and zoning designations, as described under the Draft EIS Proposed Alternative, the Final EIS Preferred Alternative would create a single “Pilchuck District” designation with the same intended land use mix. Internal zoning distinctions would be implemented according to the Regulating Plan contained within the development regulations.</u></p>	<p>Under the Proposed Alternative, the current land use designations in the study area, Mixed Use and Commercial, would be removed in favor of new designations that would encourage a more focused set of uses than are allowed under the current regulations. Preferred uses for the Proposed Alternative would include single-family dwellings, townhouses, stacked-flat apartments, retail, personal and professional services, office uses, and guest accommodations.</p> <p>The Proposed Alternative would require amendments to the City of Snohomish Comprehensive Plan Land Use Map to reflect the adoption of new land use designations in the study area and the reclassification of properties outside the study area that are currently designated as Mixed Use. Comprehensive Plan policies IA 7.1 and 7.11, which discuss the Mixed Use designation, would also need to be amended or removed following the reclassification effort.</p>	<p>The No Action Alternative would maintain the current Mixed Use designation which encourages a mix of uses including commercial and light industrial uses, in addition to single-family and multifamily dwellings. Under the No Action Alternative, land use patterns in the study area would remain similar to current conditions, though the amount of single-family dwellings in the area is expected to decline. Over time, old residential and commercial buildings would be replaced as these properties redevelop, and many single-family parcels would convert to multifamily or commercial uses allowed under the current land use regulations.</p>

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p><u>Similar to the Draft EIS Proposed Alternative, the Final EIS Preferred Alternative would implement a form-based zoning code to govern development within the Pilchuck District. A stated purpose of the Pilchuck District Design Standards proposed as part of the Final EIS Preferred Alternative is to foster visual compatibility between adjacent uses. The regulating plan included in the Final EIS Preferred Alternative (Figure 2-2), shows a clustering of use intensities that, similar to the Draft EIS Proposed Alternative, will reduce the potential for incompatibilities within the district. While the introduction of higher densities and higher-intensity uses in the Pilchuck District has the potential to create incompatibilities with adjacent development outside the district or with low-intensity uses within the district, these can be mitigated through application of the proposed design standards and form-based code.</u></p>	<p>The Proposed Alternative would not limit residential densities, which would allow the number of units in a given development to be regulated only by building form standards, such as height and lot coverage. With this increase in allowed density, multifamily units would likely constitute a larger percentage of the housing stock in the study area than under current conditions.</p>	<p>Over time, the No Action Alternative would result in the study area being characterized by higher-density residential and more retail than under current conditions. Unlike the Proposed Alternative, the No Action Alternative would not provide designated areas for single-family dwellings and would result in less extensive protection of existing single-family development than the Proposed Alternative.</p>
<p><u>Land use patterns under the Final EIS Preferred Alternative are anticipated to be similar to the Draft EIS Proposed Alternative.</u></p>	<p>The primary changes to land use patterns that would occur under the Proposed Alternative would be redevelopment of single-family dwellings in the study area as townhouses and multistory apartment buildings and the eventual phasing out of single-use commercial and industrial uses in favor of retail, professional service, and office uses that are compatible with a pedestrian-oriented urban environment.</p>	<p>The No Action Alternative would not provide for the protection of single-family uses as extensively as the Proposed Alternative and could result in greater loss of existing single-family dwellings.</p>

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p><u>Land use patterns under the Final EIS Preferred Alternative are anticipated to be similar to the Draft EIS Proposed Alternative.</u></p>	<p>Implementation of the “Mix” designation along the western and southern boundaries of the study area would result in a mix of retail, office, and multifamily residential uses that would serve as a “bridge” between Historic Downtown Snohomish to the southwest and the single-family and townhouse development proposed for the northeast portion of the study area. This mix would also provide access to additional retail and employment uses for the single-family neighborhoods immediately west of the study area. However, height and scale of development would be a primary concern in this portion of the study area.</p>	<p>Under No Action, future development in the study area is anticipated to trend toward commercial uses, though the current Mixed Use designation would continue to allow a broad mix of uses, leading to a lack of certainty over future conditions. While all development except single-family dwellings would be subject to currently adopted design standards, this uncertainty continues the potential for compatibility issues between dissimilar land uses within the study area.</p>
<p><u>Similar to the Proposed Alternative.</u></p>	<p>Because the Proposed Alternative would allow for stacked flat apartments and mixed-use buildings taller than three stories within the study area, adoption of the Proposed Alternative could conflict with the following Land Use Element policy (Policy MF 5.14), which would require revision by the City. The policy states that high-rise apartments in excess of three stories will not be allowed within the City at this time.</p>	<p>Under the No Action Alternative, the Pilchuck District Subarea Plan would not be adopted, and development and redevelopment in the study area would continue under existing policies and regulations.</p>

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p><u>The Final EIS Preferred Alternative would result in the same net change in population and employment as the Draft EIS Proposed Alternative.</u></p>	<p>Under the Proposed Alternative, residential and mixed-use development in the study area would occur at greater densities than under current regulations, allowing for additional residential and employment capacity than currently exists. The Proposed Alternative would also result in an increase in employment capacity. With the large increase in population capacity that would result from implementation of the Proposed Alternative, the study area would be allowed to absorb a larger share of the City’s projected population growth than under existing conditions. Adoption of the Proposed Alternative would necessitate revisions to the Land Use and Housing Elements of the Comprehensive Plan to update the population and housing targets, and to reflect updated capacity numbers.</p>	<p>Under the No Action Alternative, no amendments to development regulations would be adopted, and development patterns in the study area would continue to resemble current conditions.</p>
<p><u>The Final EIS Preferred Alternative provides more details about proposed Comprehensive Plan policy amendments, form based height, setback, and other zoning standards, and design standards (Final EIS, Appendices A through C).</u></p>	<p>The <i>Pilchuck District Subarea Plan</i>, which would be adopted as part of the Proposed Alternative, includes a collection of alternative street cross section to be implemented as part of the City’s Transportation Plan and Engineering Standards. In addition, greater growth would require implementation of additional transportation improvement projects not currently listed in the Transportation Element of the Comprehensive Plan, and revision of the Transportation Improvement Program (City of Snohomish 2007:10-54) to reflect these projects.</p>	<p>The No Action Alternative would not require Comprehensive Plan amendments regarding land use. However, land use allowed by the No Action Alternative would require an additional improvement to an intersection not currently included in the Transportation Element and would require some amendment of the Transportation Element and Transportation Improvement Program.</p>

Mitigation Measures

The Proposed Alternative **and Final EIS Preferred Alternative** includes adoption of the Pilchuck District Subarea Plan as part of the Comprehensive Plan. The subarea planning process is ongoing though a number of preliminary studies and concept plans have been produced that reflect the goals and values that will be expressed by the completed plan. These documents include: Draft Framework Goals (March 26, 2010); Design Examples for Infill Development and Public Realm; and Public Realm Concept Plan. The Final EIS Preferred Alternative provides more details about proposed Comprehensive Plan policy amendments, form based height, setback, and other zoning standards, and design standards (Final EIS, Appendices A through C).

Adoption of the Proposed Alternative would require the City to amend Comprehensive Plan land use designations in areas outside the study area

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p>where the Mixed Use designation is applied.</p>		
<p>With adoption of the Proposed Alternative, the City should conduct a survey of properties currently designated as mixed use outside the study area and assess the appropriateness of applying surrounding land use designations to these areas.</p>		
<p>If the Proposed Alternative/<u>Final EIS Preferred Alternative</u> is adopted, the City would amend its Comprehensive Plan as follows: The City would amend its Land Use Map to include the new land use designations applied to the study area, as well as any reclassification of parcels outside the study area currently designated as Mixed Use. <u>The Final EIS Preferred Alternative includes amendments to the Land Use Map to reflect changes within the Pilchuck District (see Appendix A). Under the Final EIS Preferred Alternative, no changes would occur to parcels outside the study area currently designated as Mixed Use; therefore, no Land Use Map revisions would be necessary to reflect this.</u> The City would amend or delete Land Use Policies IA 7.1 and IA 7.11, which discuss the Mixed Use designation, to reflect any revisions to or removal of the Mixed Use designation. <u>This is not necessary for the Final EIS Preferred Alternative, which does not propose revisions to or deletion of the Mixed Use designation.</u> The City would clarify or delete Land Use Policy MF 5.14, which states that apartments taller than three stories are not allowed <u>(this is included in the Final EIS Preferred Alternative – see Appendix A). Additionally, the City will clarify or delete Land Use Policy MF 5.3, which states that apartment densities should not exceed 24 units.</u> The City will amend the Transportation Improvement Program, contained in the Transportation Element, to reflect new transportation improvement projects necessitated by adoption of the Proposed/<u>Preferred Alternative, as relatively minor, low-cost improvements, will be required of specific development project approvals for consistency with adopted concurrency requirements. As appropriate, the City intends to amend the Transportation Element to describe the minor improvements as part of its docket process.</u> The City would amend the Housing Element of the Comprehensive Plan to reflect updated land capacity figures and housing mix information. The City would amend the Land Use Element of the Comprehensive Plan to reflect updated population targets<u>land use designation acreages and capacities as appropriate.</u></p>		
<p>If the Proposed Alternative is adopted, the City would amend SMC Title 14 to reflect the addition of new land use designations for the study area and the revision or deletion of the Mixed Use designation.</p>		

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p>3.3 Aesthetics</p>		
<p>Impacts Common to All Alternatives Under both the Proposed Alternative and No Action Alternative <u>all alternatives</u>, the study area is expected to experience gradual growth through redevelopment. This redevelopment will result in a change to the current aesthetic conditions of the area, affecting the following aspects: Visual Character – Redevelopment and public improvements would likely change the quality of the visual character. These changes would potentially alter the existing, generally suburban appearance of the study area to a more urban character. Additionally, both studied <u>alternatives</u> would allow replacement of historic buildings that currently contribute to the character of portions of the study area. Public improvements for streets, sidewalks, and recreation areas, which are typically programmed to meet the ongoing and evolving needs of the community, would occur. Height and Bulk – New development would have smaller setbacks and greater heights in portions of the study area relative to current conditions. Aesthetic incongruities or conflicts of scale between adjacent new and existing buildings could occur due to differences in height, setbacks, and overall massing. Light and Glare – Redevelopment would gradually increase the residential population of the study area and the number of businesses. More people and an increased concentration of businesses would generate more ambient lighting through internal and external building lights, pedestrian lighting, street lights, commercial signage, and vehicle headlights. Views – No significant adverse view impacts would occur under either studied <u>alternatives</u>. Increased building heights under either alternative would potentially create views that are not currently available. Intensification of development along the Pilchuck River may also make views east available to a wider audience. The creation of views is considered a potential positive impact. Shading Conditions – New development would have greater height and lot coverage than under existing condition in portions of the study area, resulting in the potential for increased shade impacts.</p>		
<p><u>The Final EIS Preferred Alternative would result in a similar neighborhood character to the Proposed Alternative, including a pedestrian-oriented streetscape, increased building heights, and reduced at-grade parking.</u></p>	<p>Under the Proposed Alternative, the Pilchuck District Subarea Plan and associated regulations would transform the study area into a distinctive neighborhood with an urban, pedestrian-oriented streetscape, increased building heights, and a lower percentage of land consumed for at-grade parking.</p>	<p>Under the No Action Alternative, the study area would transition to a more urban character similar to, but not to the extent of, under the Proposed Alternative.</p>

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p><u>Similar to the Proposed Alternative, maximum building height under the Final EIS Preferred Alternative would increase for certain portions of the study area from the existing maximum of three stories (35 feet) to four and five stories. The Final EIS Preferred Alternative allows each building story to be taller than under the Proposed Alternative, thus increasing maximum allowed building heights to 53 feet (three stories) and 81 feet (five stories). This additional height would increase the appearance of bulk and massing at street level.</u></p>	<p>Maximum building height would increase for certain portions of the study area from the existing maximum of three stories (35 feet) to four and five stories, equating to about 45 and 55 feet in height. The additional height increase under the Proposed Alternative would increase the appearance of bulk and massing at the street.</p>	<p>Under the No Action Alternative, existing zoning regulations and design standards would apply to new development. Buildings would be limited to 35 feet in height.</p>
<p><u>Based on modeling, shading conditions under the Final EIS Preferred Alternative are anticipated to be similar to the Draft EIS Proposed Alternative during summer months, though shading effects would be slightly more pronounced in spring and autumn. Winter shading is estimated to be greatly increased over existing conditions under both the Draft EIS Proposed Alternative and the Final EIS Preferred Alternative. The application of design standards and other mitigation measures would be necessary to alleviate potential shading of public spaces and adjacent lower structures.</u></p>	<p>Due to the allowance for greater building heights, the Proposed Alternative would have greater potential for shade impacts than the No Action Alternative.</p>	<p>The No Action Alternative would have the potential to result in short-term and long-term shading impacts, but not to the extent of the Proposed Alternative.</p>
<p><u>The Final EIS Preferred Alternative would not result in a substantially larger increase in ambient light and glare, and the proposed Pilchuck District Design Standards (Final EIS Appendix C) contain regulations for the use of exterior illumination that would mitigate the effects of additional development.</u></p>	<p>Due to increased development heights and densities, the Proposed Alternative would likely result in more ambient light and therefore greater light and glare impacts than under the No Action Alternative.</p>	<p>Because of lower building height allowances, lower densities, and lower incentives for redevelopment, the No Action Alternative would likely result in lower light and glare impacts than the Proposed Alternative.</p>

Mitigation Measures

Under ~~both~~ all alternatives, development would be directed by standards that would guide the form and character of the buildings, quality and quantity of landscaping, treatment of parking areas, and setbacks and open space. Street and park landscaping would further increase the amount of “green infrastructure” and soften the visual character of the study area. The Final EIS Preferred Alternative includes adoption of design standards and a form-based code specific to the study area.

<u>Final EIS Preferred Alternative</u>	<u>Proposed Alternative</u>	<u>No Action Alternative</u>
<p>Five-story buildings would only be allowed in locations that are generally separated from lower intensity land uses and on larger sites where site-sensitive site planning would avoid incongruities of scale between juxtaposed buildings.</p>		
<p>Setbacks for floor area above the third floor and other design features such as pedestrian-level architectural features, weather protection, and street trees would mitigate the visual impact of taller buildings. <u>The Final EIS Preferred Alternative includes an extensive set of design standards specific to the study area that address upper-story setbacks, roof forms, façade modulation, and other methods to reduce massing and bulk.</u></p>		
<p>The Proposed Alternative/<u>Final EIS Preferred Alternative</u> would limit future development in most of the single-family character blocks to single-family and townhouse development to preserve the primarily residential character of these blocks.</p>		
<p>New zoning standards and design guidelines would be adopted as part of the Proposed Alternative/<u>Final EIS Preferred Alternative</u>. Design tools to be incorporated would mitigate the appearance of bulk and massing of buildings and minimize the potential for shading impacts; limit light impacts on the streetscape and adjacent properties; and create continuity with the City’s existing character and historic roots. <u>See Section 3.3.3 for a full list of potential design tools. The Final EIS Preferred Alternative includes a set of design standards and a form-based code specific to the study area that includes these design tools.</u></p>		
<p><u>If the Final EIS Preferred Alternative is adopted, the additional building heights allowed over the Proposed Alternative could be mitigated through the implementation of additional upper-story setback requirements or by requiring site-specific shading studies at the time of development application where new development in the Pilchuck District would exceed 55 feet and would be located across the street from property zoned as single-family or adjacent to a public park.</u></p>		

3.4 Transportation

Impacts Common to All Alternatives		
<p>Under both the Proposed Alternative and the No Action Alternative<u>all alternatives</u>, traffic volumes would increase, resulting in a lower LOS for certain intersections. Existing truck routes through the study area would continue, including Pine Avenue north of Second Street, Second Street west of Pine Avenue, and Lincoln Avenue south of Second Street. The Centennial Trail segment within the study area would be constructed, providing improved non-motorized mobility within and through the study area. Improved mobility is a positive impact.</p>		
<p><u>Same as the Proposed Alternative. The following four study intersections are projected to exceed the City’s adopted level of service (LOS) standard (LOS E) during the PM peak hour in 2030:</u> <u>Third Street/Pine Avenue</u> <u>Fourth Street/Maple Avenue</u> <u>Fourth Street/Pine Avenue, and</u> <u>Maple Avenue/Pine Avenue.</u></p>	<p>Under the Proposed Alternative, the following four study intersections are projected to exceed the City’s adopted LOS standard (LOS E) during the PM peak hour in 2030: Third Street/Pine Avenue Fourth Street/Maple Avenue Fourth Street/Pine Avenue, and Maple Avenue/Pine Avenue.</p>	<p>Under the No Action Alternative, all study intersections are projected to operate within the City’s adopted LOS standard (LOS E) during the PM peak hour in 2030, except for the Maple Avenue/Pine Avenue intersection.</p>

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p><u>As part of the Final EIS Preferred Alternative, the Pilchuck District development code includes parking standards and regulations specific to the Pilchuck District. Parking shall be accessed by rear alleys wherever feasible, or from a side street. Where feasible, parking access should be consolidated for multiple sites. Only one access point to parking facilities shall be permitted for a lot with a detached single-family dwelling. In any building, 1,500 square feet or 30 percent, whichever is less, of ground-floor retail, office, and service uses adjacent to and accessed directly from a public street shall be exempt from the off-street parking standards. Except as exempted for ground-floor commercial, non-residential uses would be subject to the Historic Business District standard of one space per 400 square feet of gross floor area. On-street parking is encouraged to provide convenient parking and to separate moving vehicles from sidewalks. Joint use parking facilities may be permitted.</u></p>	<p>As part of the Proposed Alternative to promote a more pedestrian-friendly environment, parking standards would be evaluated and reductions would be proposed where justified according to anticipated demand. Credit for on-street parking adjacent to ground-floor commercial uses could be counted toward meeting parking supply standards. Maximum parking standards could be implemented. Off-street parking beside, behind, or beneath structures would be required.</p>	<p>Under the No Action Alternative, parking ratios would continue as currently adopted, with no maximum parking standards and no credit for adjacent on-street parking.</p>
<p><u>Same as Proposed Alternative. For buildings greater than 3 stories in height, a minimum of 50 percent of required parking spaces shall be located within structured parking.</u></p>	<p>Structured parking is an element of the Proposed Alternative.</p>	<p>Current parking in the study area is entirely at-grade, with under-structure parking for some of the apartment uses. The same configuration would likely continue under the No Action Alternative.</p>

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p><u>New street design standards are incorporated in the Final EIS Preferred Alternative. The proposed street standards in the Final EIS Preferred Alternative are similar to the Proposed Alternative public realm plan. Pilchuck District street types and designs vary according to the available right-of-way, the adjacent urban use and form, and the functional requirements of the roadway. In all cases, roadways are intended to provide for both motorized and non-motorized transportation modes with slower design speeds to ensure the safety of pedestrians, bicyclists, and motorists.</u></p>	<p>The Proposed Alternative includes the adoption and implementation of new street standards providing greater pedestrian safety and comfort; and development generally consistent with “smart growth” principles: compact, mixed use, and transit and pedestrian oriented development. With these elements, the Proposed Alternative would be more conducive to pedestrian and bicycle mobility.</p>	<p>The No Action Alternative includes a number of street and intersection improvements that would improve pedestrian and bicycle mobility</p>
<p><u>Same as Proposed Alternative.</u></p>	<p>Since the Proposed Alternative would include compact, mixed use, and transit- and pedestrian-oriented development consistent with “smart growth” principles, it would result in increased demand for transit services and facilities.</p>	<p>Lower density land use under the No Action Alternative would be less conducive to transit service and less supportive of the City’s transit policies.</p>

<p>Mitigation Measures</p>
<p>Future transportation improvements common to both alternatives in the study area are described in Section 3.4 <u>of the Draft EIS</u>.</p>
<p>The Growth Management Act requires that "local jurisdictions must adopt and enforce ordinances which prohibit development approval if the development causes the level-of-service on a transportation facility to decline below the standards adopted in the Transportation Element of the Comprehensive Plan, unless transportation improvements or strategies to accommodate the impacts of development are made concurrent with the development."</p>
<p>Mitigation measures for each alternative include the actions necessary to meet the City’s LOS threshold for the study intersections.</p>
<p>The Maple Avenue/Pine Avenue intersection is projected to exceed the City’s adopted LOS standard in 2030, under both the No Action Alternative and Proposed Alternative <u>under all alternatives</u>. The proposed mitigation for this intersection includes adding a left-turn lane for eastbound and westbound approaches on Maple Avenue, and adding a right-turn lane for northbound and southbound approaches on Pine Avenue.</p>
<p>Other capacity improvements required for the Proposed Alternative <u>and the Final EIS Preferred Alternative</u> include the following: Third Street/Pine Avenue: add a westbound left-turn lane on Third Street. Fourth Street/Maple Avenue: change the intersection control to an all-way stop control. Fourth Street/Pine Avenue: add a westbound left-turn lane on Fourth Street.</p>
<p>Additional transit measures could be incorporated to accommodate increased transit ridership. These measures include coordinating with Community Transit to closely monitor transit usage and ensure that bus routes and scheduling is optimized for the City residents; and coordinating with the</p>

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
Washington State Department of Transportation (WSDOT) and Community Transit to design and implement transit-specific improvements along Second Street.		
3.5 Cultural Resources		
Impacts Common to All Alternatives		
Typical project impacts that could disrupt or adversely affect cultural resources include:		
<ul style="list-style-type: none"> • demolition, removal, or substantial alteration without consideration of historic and archaeological sites and/or features; • incompatible massing, size, scale, or architectural style of new development on adjacent properties; • obstruction or extensive shading of significant views to and from a resource by new development; • incompatible use of an existing building or structure; • disruption of integrity of setting; and • long-term loss of access to the property. 		
<p><u>All</u> Both alternatives accommodate future growth in the study area: the No Action Alternative on the low end and the Proposed Alternative/<u>Final EIS Preferred Alternative</u> on the high end. Development to accommodate this growth could occur on any property in the study area under both-studied alternatives. Therefore, potential impacts on unknown cultural resources would be the same under either-the studied alternatives, although the likelihood of those impacts would vary.</p>		
<p><u>Similar to the Proposed Alternative, the Final EIS Preferred Alternative supports a higher level of growth in the study area than the No Action Alternative, necessitating a corresponding higher level of development. Therefore, the Final EIS Preferred Alternative is more likely to have impacts on cultural resources compared to the No Action Alternative.</u></p>	<p>The Proposed Alternative supports a higher level of growth in the study area than the No Action Alternative, necessitating a corresponding higher level of development. Therefore, the Proposed Alternative is more likely to have impacts on cultural resources.</p>	<p>Under the No Action Alternative, development would proceed under the Comprehensive Plan and development regulations. Because the study area would experience less growth and related development than under the Proposed Alternative, impacts on cultural resources would be less likely.</p>
<p><u>The Final EIS Preferred Alternative, similar to the Proposed Alternative, includes a Planned Action Ordinance that would exempt from future SEPA threshold determinations and EISs those projects that are consistent with the projects and parameters analyzed in this EIS.</u></p>	<p>The Proposed Alternative includes a Planned Action Ordinance that would exempt from future SEPA threshold determinations and EISs those projects that are consistent with the projects and parameters analyzed in this Draft-EIS.</p>	<p>Detailed review of potential impacts on cultural resources would be required on a project-specific basis.</p>
<p><u>The Final EIS Preferred Alternative, similar to the Proposed Alternative, but to a greater level of detail, includes design standards tailored to the study area, which are intended to produce compatible development.</u></p>	<p>The Proposed Alternative includes design standards tailored to the study area, which are intended to produce compatible development.</p>	<p>The City's <i>Design Standards and Guidelines (outside the Historic District)</i> would continue to apply to development in the study area.</p>

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
Mitigation Measures		
<p>Both <u>All</u> alternatives would continue to apply the following historic resource policies found in the Comprehensive Plan.</p>		
<p>Any development activity shall comply with all relevant city, federal, and state laws. The Proposed Alternative <u>and Final EIS Preferred Alternative</u> includes a Planned Action Ordinance that would exempt from future SEPA threshold determinations and EISs those projects that are consistent with the projects and parameters analyzed in this Draft EIS. Although SEPA would not apply, the mitigation measures identified in this Draft EIS would be applied through permitting. In this way, the City would have the means to require additional cultural resource analysis should development or capital improvements affect potentially significant properties.</p>		
<p>The following mitigation measures are recommended for all future development projects in the study area.</p>		
<p><u>Built Environment</u>Historic Resources:</p>		
<p>In the event that a proposed development site within the study area contains a building at least 50-years of age that is not listed on the <u>National Register of Historic Places</u> (NRHP) or Washington Heritage Register, the project would be required to undergo review to determine if it is considered eligible for listing. Figure 3-5.1 in Section 3.5 <u>of the Draft EIS</u> shows the properties in the study area, identified by the decade of construction. It is recommended that the City adopt a historic preservation ordinance, in addition to Chapter 14.225, that considers the treatment of historic resources located outside the Historic District that are listed in or determined eligible for the NRHP or the Washington Heritage Register, or locally designated. Until such time as an ordinance is adopted, the City must enter into consultation with DAHP on potential impacts to historic resources in the study area that are listed in or determined eligible for the NRHP or the Washington Heritage Register. Prior to adoption of a historic preservation ordinance, modifications to historic resources in the study area, as identified above, must also comply with the provisions established for the Historic District in <u>Snohomish Municipal Code</u> (SMC) 14.225, except that new design standards adopted as part of the Proposed Alternative may be applied in such cases in lieu of the Historic District Design Standards, if determined to provide comparable or better historic resource protection.</p>		
<p><u>Archaeological Resources:</u></p>		
<p>For future projects that involve significant excavation in the study area the City must enter into consultation with DAHP to determine the likelihood of and recommendations to address potential archaeological resources. It may be necessary to complete archaeological testing prior to significant excavation in the study area, such as digging for footings or utilities. In the portions of the study area near existing waterways, which are high probability areas for cultural resources, it may be necessary to complete archaeological testing for projects that involve changes to vegetation and landforms. Such changes could include, but are not limited to, any ground disturbance required to plant new vegetation, the removal of existing vegetation, and landform grading. Archaeological project monitoring may be recommended for subsurface excavation and construction in these high probability areas.</p>		
<p>In the event that a future development project in the study area is proposed on or immediately surrounding a site containing an archaeological resource, the potential impacts on the archaeological resource must be considered and, if needed, a study conducted by a qualified professional archaeologist to determine whether the proposed development project would materially impact the archaeological resource.</p>		
<p>If the impacts on archaeological resources cannot be avoided, the City will ensure that all appropriate permits are obtained to comply with state and federal laws and any required archaeological studies are completed before permitting any project that would disturb archaeological resource(s). Under RCW 27.53, a permit must be obtained from DAHP prior to impacting a known archaeological resource or site. If the project would disturb an archaeological resource, the City will impose any and all measures to avoid or substantially lessen the impact. If avoidance of the archaeological resource is not possible, an appropriate research design must be developed and implemented with full data recovery of the archaeological resource prior to the development project. The avoidance of archaeological resources through selection of project alternatives and changes in design of project</p>		

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p>features in the specific area of the affected resource(s) would eliminate the need for measuring or mitigating impacts.</p>		
<p>Non-site-specific mitigation could include developing an educational program, interpretive displays, design guidelines that focus on compatible materials, and professional publications.</p>		
<p><u>The Final EIS Preferred Alternative includes proposed form-based code amendments in Appendix B that apply provisions of the City’s Historic District Regulations regarding design and demolition to the Pilchuck District, similar to several of the Draft EIS mitigation measures.</u></p>		
<p>3.6 Stormwater</p>		
<p>Impacts Common to All Alternatives</p>		
<p>Since the study area is largely developed and much of the development does not include stormwater runoff treatment BMPs, the primary potential source for impacts on the quality of stormwater runoff would occur from construction activities during redevelopment of existing improved land. This occurs under both the No Action Alternative and the Proposed Alternative <u>all alternatives</u>.</p>		
<p>There is currently very little undeveloped land in the Pilchuck District; however, development of currently unimproved land would also affect stormwater quantity and quality in the study area by removing what remains of natural ground cover and pervious surface area and by further increasing impervious surface area.</p>		
<p><u>The Final EIS Preferred Alternative slightly reduces lot coverage (impervious surface) standards from up to 100% in the Proposed Alternative to up to 90% of the site area, depending on the type of development. This slight reduction in allowed impervious surface could decrease the amount of stormwater runoff generated when compared to the Proposed Alternative.</u></p>	<p>The Proposed Alternative would increase the total amount of impervious area in the Pilchuck District at full redevelopment compared to existing conditions.</p>	<p>By not promoting redevelopment within the Pilchuck District, less redevelopment is expected to occur and less of the already impervious surface in this area with no stormwater runoff treatment would be redeveloped with state of the art treatment BMPs.</p>
<p><u>The Final EIS Preferred Alternative is estimated to have similar impacts as the Proposed Alternative since it has the same growth projections and general design and construction requirements.</u></p>	<p>The transfer of development rights to the Pilchuck District should decrease the total amount of impervious area outside the Pilchuck District in the future, which would be beneficial to water quality of the receiving water bodies in those development right sending areas.</p>	<p>The lower density could lead to more conversion of natural/pervious surfaces to developed impervious surfaces outside of the Pilchuck District which could add pollutants to receiving water bodies and increase flow rats.</p>

Final EIS Preferred Alternative	Proposed Alternative	No Action Alternative
<u>Same as Proposed Alternative.</u>	By promoting landscaping in the public realm and limiting further development in public open space or critical environmental areas such as parks, wetlands, and forested areas, vegetated ground cover and soils can help to intercept stormwater runoff from impervious surface areas to decrease erosion and pollutants to the receiving surface water bodies.	The No Action Alternative does not include promoting landscaping in the public realm and limiting further development in public open space or critical environmental areas.

Mitigation Measures

Regardless of whether the redevelopment occurs under the No Action Alternative or the Proposed Alternative/Final EIS Preferred Alternative, the redevelopment would include obtaining the necessary stormwater runoff permits and installing required stormwater treatment BMPs to comply with local, state, and federal regulations. Properly installed temporary erosion and sediment control BMPs during construction (e.g., silt fence, straw covered exposed soil, check dams in ditches), as required by multiple regulations, will minimize the risk of water quality degradation during construction activities. The inclusion of stormwater treatment BMPs, especially infiltration BMPs, with the redevelopment where there currently is no stormwater treatment should lead to an overall improvement of water quality to the receiving water bodies.

Since low impact development techniques such as infiltration are encouraged but not required, the City could through the Planned Action Ordinance require infiltration for all future projects where infiltration is technically viable, and require low impact development techniques to the maximum extent allowed by the specific characteristics of the site and proposed development.

The *Stormwater Management Manual for Western Washington* was adopted by the City; it will provide the methodology used for designing stormwater treatment BMPs for redevelopment projects within the study area. Infiltration of stormwater runoff is the preferred method because it most closely simulates natural conditions. The soils throughout the study area are well suited for infiltration and thus infiltration should be used as the primary method for treating stormwater.

Runoff from pollutant generating impervious surfaces, primarily roads and parking lots, will need to be evaluated during design of the specific future projects. This evaluation will determine if water quality pretreatment is necessary prior to discharging the stormwater to the infiltration BMP.

Given the proposed high density urban setting of the study area, open ponds will not be practical and underground infiltration BMPs are likely to be the method used for treatment.

BMPs that are effective at stormwater treatment and would fit well into the various conceptual site plans for the Steuber study site include underground infiltration trenches; porous pavement; bioretention areas; runoff dispersal; rainwater harvesting; and underground water quality vaults. These options are discussed in more detail in Section 3.6 of the Draft EIS.

BMPs that are effective at stormwater treatment and would fit well into the various conceptual Small Residential Lot Assemblages include underground infiltration trenches; porous pavement; rainwater harvesting; bioretention areas; and underground water quality vaults. These options are discussed in more detail in Section 3.6 of the Draft EIS.

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
3.7 Sewer and Water		
<p>Impacts Common to All Alternatives Under <u>both</u> alternatives, the City as a whole, and the study area in particular, would experience growth and thus an increase in demand for water and sewer collection and treatment services.</p>		
<p><u>Water: The Final EIS Preferred Alternative is estimated to have similar impacts as the Proposed Alternative since it has the same growth projections. Due to the concentration of new development in the study area under the Preferred Alternative, increases in water demand would be felt primarily in the 222 pressure zone, which contains the study area.</u></p>	<p>Water: Due to the concentration of new development in the study area under the Proposed Alternative, increases in water demand would be felt primarily in the 222 pressure zone, which contains the study area. Under the Proposed Alternative, either the Pilchuck or Everett water source could provide the demand. The Proposed Alternative’s demand would require increased storage; however, the remaining 222 pressure zone storage could be met by additional storage located in the Everett supply area or north portion of the City.</p>	<p>Water: Water demand and storage requirements would be less under the No Action Alternative, and specifically for the 222 pressure zone. Under the No Action Alternative, additional storage would be required in the north portion of the City. Storage not used for the 222 pressure zone could be used for some areas of growth in other areas of the UGA.</p>
<p><u>Fire Flow: Under the Preferred Alternative, replacement and additional water pipemains would be necessary to meet fire flow requirements under the International Fire Code for the type and scale of potential development identified for the Pilchuck District. Inadequate fire flow would be an impact to implementation of the Pilchuck District Subarea Plan and development regulations. Implementation of water system improvements similar to the No Action Alternative would reduce impacts.</u></p>	<p>Fire Flow: Under the Proposed Alternative, replacement and additional water pipes would be necessary to meet fire flow requirements at the time of development. Initial analysis indicates that without adequate system improvements, increasing building heights could have a negative effect on fire flow pressure. Implementation of piping similar to the No Action Alternative would reduce impacts.</p>	<p>Fire Flow: Almost all piping in the study area would need to be replaced with 12-inch ductile iron pipe to meet the current 3,000 gallons per minute (gpm) fire flow requirement.</p>

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p><u>Wastewater: The 2005 Facility Plan recommends an improvement plan to the Rainer Lift Station, which would address the additional growth in the study area, meeting the Final EIS Preferred Alternative's additional growth demand.</u></p>	<p>Wastewater: The 2005 Facility Plan recommends an improvement plan to the Rainer Lift Station, which would address the additional growth in the study area, meeting the Proposed Alternative's additional growth demand. For the long-term and growth-related improvements to the City's wastewater treatment plan, regional sewer solutions described under the No Action Alternative will address growth both within the current urban growth area (UGA) and outside.</p>	<p>Wastewater: The City is working with the Washington State Department of Ecology and the city of Everett to develop a long-term solution that addresses future growth. The regional solution, as part of early planning, is considered to be the most environmentally preferred solution, given that it removes the discharge from the Snohomish River. The City's wastewater planning efforts will provide an opportunity to select a solution after additional agency and public comment.</p>

Mitigation Measures

~~The No Action Alternative and Proposed Alternative~~ **All alternatives** would retain the Comprehensive Plan goals regarding water and sewer service. Other applicable regulations include SMC Title 15 related to sewer and water, and the standards defined in the City's Engineering Design and Construction standards.

The City should complete its Water System Plan Update which will identify all piping to be replaced in the study area.

Backflow prevention assemblies are recommended at each metered connection to protect the system.

The City should complete its Engineering Report update to the 2005 Facility Plan and address regional solutions to wastewater treatment to serve the study area and the UGA. The City could implement improvements such as the Rainer Lift Station improvements dependant on both demand and standard repair and replacement needs based on current use.

3.8 Parks, Schools, Police and Fire

Impacts Common to All Alternatives

Residential and commercial growth would result from **allboth** alternatives. Increases in population density under both alternatives could increase the number of calls for police and medical emergency services and the use of existing school and park and recreation facilities. Increases in traffic related to growth under both alternatives could affect the response time of emergency vehicles. Increases in vehicle and pedestrian traffic could result in the need for additional traffic enforcement.

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p><u>Police Protection: Future development would result in an incremental increase in calls for emergency service. Increased retail and office establishments could result in increased crimes of shoplifting and fraud at a rate similar to other city businesses. The effects are estimated to be similar to the Proposed Alternative because the Final EIS Preferred Alternative includes a similar land use pattern and growth estimates.</u></p>	<p>Police Protection: Future development would result in an incremental increase in calls for emergency service. Increased retail and office establishments could result in increased crimes of shoplifting and fraud at a rate similar to other city businesses.</p>	<p>Police Protection: Future development would result in an incremental increase in calls for emergency service, although likely less than under the Proposed Alternative. Due to the higher ratio of new commercial area to new residential units, property crimes under the No Action Alternative would be more likely to involve businesses relative to the Proposed Alternative and the existing condition. Crimes related to residential properties would likely be less than under the Proposed Alternative due to the lower increase in residential capacity.</p>
<p><u>Fire and Emergency Medical Services: Future development and commensurate increases in population and jobs could result in increases in the Fire District 4 fire and emergency medical services call load relative to the existing conditions and the No Action Alternative; this is the case for the Preferred and the Proposed Alternatives, which have similar growth projections. Fire District 4 has recommended procedural and building code enforcement measures to mitigate the added difficulty of fire suppression and extraction of residents from buildings four stories and taller (see Mitigation Measures in Chapter 1).</u></p>	<p>Fire and Emergency Medical Service: Future development and commensurate increases in population and jobs could result in increases in the Fire District 4 fire and emergency medical services call load relative to the existing circumstance and the No Action Alternative. Fire District 4 has recommended procedural and building code enforcement measures to mitigate the added difficulty of fire suppression and extraction of residents from buildings four stories and taller (see Mitigation Measures).</p>	<p>Fire and Emergency Medical Service: Under the No Action Alternative, increase in population and jobs could result in increases in the Fire District 4 fire and emergency medical services call load relative to the existing circumstance but less than under the Proposed Alternative. Since the maximum building height under the No Action Alternative would be limited to 40 feet, no changes to the standard methods of fire suppression and medical emergency response would be necessary.</p>
<p><u>Parks and Recreation: The Final EIS Preferred Alternative, similar to the Proposed Alternative, would support a larger resident and employment population, increasing demand for park and recreation facilities in the area. Similar to the Proposed Alternative, the Final EIS Preferred Alternative would result in the need for two additional softball diamonds and one additional basketball court beyond the current deficits.</u></p>	<p>Parks and Recreation: The Proposed Alternative would support a larger resident and employment population, increasing demand for park and recreation facilities in the area. Impacts on level of service standards for parks and specific types of recreation facilities are discussed in Draft EIS Section 3-8.</p>	<p>Parks and Recreation: The No Action Alternative would increase the demand for park and recreation facilities, but to a lesser degree than the Proposed Alternative. Impacts on the LOS standards for parks and specific types of recreation facilities are discussed in Draft EIS Section 3-8.</p>

<u>Final EIS Preferred Alternative</u>	Proposed Alternative	No Action Alternative
<p><u>Schools: Development under the Final EIS Preferred Alternative is anticipated to occur gradually. Furthermore, district-wide, classroom capacity is currently available to absorb the additional increment of student growth that would result from development of the residential capacity of the Final EIS Preferred Alternative, which is the same as the Proposed Alternative.</u></p>	<p>Schools: Development under the Proposed Alternative is anticipated to occur gradually. Furthermore, district-wide, classroom capacity is currently available to absorb the additional increment of student growth that would result from development of the residential capacity of the Proposed Alternative.</p>	<p>Schools: The No Action Alternative is expected to result in a reduction in enrollment. Therefore, the No Action Alternative would have a positive impact on student capacity.</p>
<p>Mitigation Measures</p>		
<p>As part of the subarea plan and implementing regulations, the City could adopt measures to ensure that building, landscaping, lighting, and access design incorporate crime prevention through environmental design (CPTED) concepts to reduce the potential for crime.</p>		
<p>The City could implement the standards and procedural conditions for development review of buildings over three stories recommended by Fire District 4 (see Section 3-8 for details)as discussed in Section 3.8 of the Draft EIS and further clarified by Fire District 4 below:-</p>		
<ul style="list-style-type: none"> • Buildings over three stories shall conform to the most restrictive building and fire codes for the type and construction of such buildings. Where otherwise allowed under applicable building and fire codes, exceptions and trade-offs shall not be allowed. • <u>Buildings in excess of three stories shall have fire and life inspections annually and in accordance with the International Fire Code.</u>The City shall implement an ongoing fire and life safety inspection program for buildings in excess of three stories. • <u>Buildings over three stories where a garden court or deck is provided on the roof shall provide a place of safety for occupants awaiting emergency responders. In addition to required exiting systems from the occupied roof, a minimum of two means of roof access shall be provided for emergency responders. At least one roof access shall be accomplished by a stairwell.</u>Buildings over three stories that include a residential component shall provide a garden court roof or other roof access for a refuge to provide a secondary place of safety as occupants wait for emergency responders. Two means of roof access shall be provided, with one being a stairwell, where possible. • <u>The City shall maintain a standard that elevators have adequate dimensions to accommodate an ambulance stretcher.</u> • <u>Streets adjacent to buildings over three stories shall provide a width of 26 feet of unobstructed access to accommodate ladder trucks or an alternative that provides equal or better fire district access.</u> 		
<p>The City could adopt the impact fees identified in the Snohomish School District’s most recent Capital Facilities Plan to reflect updated assumptions for student generation by residential building type.</p>		

1.6 Major Issues to Be Resolved

The key environmental issues facing decision makers are land use compatibility and policy consistency, aesthetics and visual character, changes to public facilities and transportation corridors, the potential of redevelopment and capital plans to affect cultural resources, changes to public services and demand for them, and the need to upgrade water and sewer infrastructure. Beneficial impacts could occur with the implementation of stormwater requirements and infiltration techniques, with the potential cleanup of hazardous materials in association with redevelopment, and with increased access to views.

1.7 Significant Unavoidable Adverse Impacts

This section describes whether there are any residual impacts after application of mitigation measures, and whether these are significant, unavoidable, and adverse.

1.7.1 Hazardous Materials

With implementation of the mitigation measures, there would be no significant unavoidable adverse effects related to hazardous materials.

1.7.2 Land Use Patterns/Plans and Policies

The Proposed Alternative/Preferred Alternative would result in greater density and intensity of land use and higher levels of employment in the study area than current conditions; though City plans generally encourage mixed use development. Implementation of the Proposed Alternative/Preferred Alternative could have adverse impacts on land use compatibility with single-family neighborhoods to the west of the study area, but these impacts could be mitigated through the use of design standards and the proposed form-based zoning code.

1.7.3 Aesthetics

The overall character and significance of visual impacts on the study area depends in large part on the quality of the architectural and urban design features incorporated into the development and the values of those viewing the changes. New development and redevelopment would result in a change to the current aesthetic conditions of the study area. Under all alternatives, temporary character and shading impacts would result from differential building heights between adjacent properties as development of individual sites occurs. The temporary impacts may be greater under the Proposed Alternative/Preferred Alternative due to the greater structural height. Impacts would diminish as redevelopment becomes more widespread throughout the study area. All alternatives would be subject to mitigation measures such as design standards. Therefore, no significant unavoidable adverse impacts on aesthetics are anticipated.

1.7.4 Transportation

Implementation of studied alternatives would result in increased traffic in the study area. Although the effects of additional vehicles on traffic conditions can be mitigated through the proposed transportation improvements, the actual increase in traffic under either alternative is considered a significant unavoidable adverse impact. A significant adverse impact would also result if one or more mitigation measures that have been identified to address expected impacts are not implemented.

1.7.5 Cultural Resources

The impacts on cultural resources caused by new development associated with studied alternatives could be significant and unavoidable, depending on the nature and proximity of any proposed development. If potential impacts on cultural resources are identified in the context of a future development project in the study area, implementation of the identified mitigation measures would reduce impacts to less than significant.

1.7.6 Stormwater

Given the extensive development already in the study area and associated adverse impacts to surface waters from existing untreated runoff, it is expected that mitigation measures associated with redevelopment under studied alternatives would lead to an overall improvement of stormwater runoff quality from the study area. If infiltration best management practices (BMPs) are used extensively throughout the study area and properly designed, there should be no unavoidable adverse impacts from stormwater runoff.

1.7.7 Sewer and Water

Although demand for utilities would increase, the application of existing and proposed plans and codes and other mitigation measures can reduce impacts associated with future growth under studied alternatives. Advanced water and sewer system planning and capital facility planning should minimize the possibility of unavoidable impacts.

1.7.8 Police, Fire, Parks, and Schools

With mitigation measures, no significant unavoidable adverse impacts are expected under studied alternatives for police protection, fire and emergency management services, parks and recreation, and schools.

Chapter 2

Description of the Alternatives

The Draft EIS issued on October 1, 2010, presented a description of two alternatives and an evaluation of the environmental impacts of future land use, transportation, and other public features in the Pilchuck District. The two alternatives analyzed in the Draft EIS were the Proposed Alternative, which includes adoption of a Pilchuck District Subarea Plan and associated development regulations and the Planned Action Ordinance; and the No Action Alternative, which is a continuation of the City's current Comprehensive Plan and development regulations applicable to the study area without amendment.

The Final EIS completes the environmental review process by revising or clarifying portions of the analysis and responding to comments on the Draft EIS. The Final EIS also introduces and reviews another alternative called the Final EIS Preferred Alternative, which is similar to the Proposed Alternative studied in the Draft EIS.

This chapter provides a brief description of the various alternatives. An introductory section is followed by a summary of the environmental review process and subsequently a brief comparison of alternatives.

2.1 Introduction

The City is planning for a mixed use area adjacent to downtown and the Pilchuck River, called the Pilchuck District. The vision for the Pilchuck District is for it to be a lively, walkable neighborhood of shops, personal and business services, offices, single-family homes, townhouses, and stacked flat apartments.

This section summarizes the Proposal and identifies the City's objectives for the Proposal.

2.1.1 Overview of the Proposal

The City proposes the following two related actions:

- Adopt the Pilchuck District Subarea Plan and related amendments to the Comprehensive Plan, and adopt associated development code amendments, and design standards. Development code amendments may address the range of permitted uses, standards for building height and form, parking, subdivision, landscaping, and other land use regulations important to the implementation of the Pilchuck District Subarea Plan. Proposed integrated street standards would establish the future design of roadways and sidewalks within the Pilchuck District. Design standards would implement the subarea plan with standards addressing site and building design.
- Adopt an ordinance designating the Pilchuck District as a Planned Action for the purposes of SEPA compliance, pursuant to RCW 43.21C.031(2)(a) and WAC 197-11-164.

2.1.2 Proposal Background

Pilchuck District Subarea Plan concepts include a more focused range of permitted land uses with emphasis on residential, office, retail, and service uses; increased residential densities and maximum building heights in targeted areas; new street standards providing greater pedestrian safety and comfort; and revisions to parking standards consistent with “smart growth” principles. Smart growth principles generally include compact, mixed use, and transit- and pedestrian-oriented development that conforms to principles as listed below:

- Create Range of Housing Opportunities and Choices.
- Create Walkable Neighborhoods.
- Foster Distinctive, Attractive Communities with a Strong Sense of Place.
- Make Development Decisions Predictable, Fair and Cost Effective.
- Mix Land Uses.
- Preserve Open Space, Farmland, Natural Beauty and Critical Environmental Areas.
- Provide a Variety of Transportation Choices.
- Strengthen and Direct Development Towards Existing Communities.
- Take Advantage of Compact Building Design (Smart Growth Network 2010).

The planning process for smart growth should be collaborative with the community (Smart Growth Network 2010).

The future of the Pilchuck District is directed by the City’s existing Comprehensive Plan (City of Snohomish 2005) and the implementing regulations that apply to the Pilchuck District Subarea Plan study area. The City has entered into a subarea planning process to review and amend existing policies and regulatory controls to ensure that policy direction for the area is clear and consistent with other City goals and that those regulations will adequately implement the current vision for the study area.

In 2008, the Cascade Land Conservancy approached the City to partner and provide grant funding for establishing a TDR program. This offer coincided with the City’s interest in conducting a subarea plan for the area currently designated as Mixed Use in the Comprehensive Plan and development code. The Mixed Use designation encompasses the majority of the study area. The City agreed to establish the policy and regulatory framework to create a TDR receiving area in conjunction with other policy and regulatory amendments for the study area.

In addition to policy guidance in the Comprehensive Plan, in 2007, the Snohomish City Council (City Council) adopted an action plan, *Imagine Snohomish: Promoting Vitality and Preserving Character* that identifies strategic opportunities for sustaining and improving City services into the future. *Imagine Snohomish* includes several strategies with potential applicability to the study area:

- reviewing existing City ordinances to ensure that they adequately support the Strategic Plan’s goals for a livable, pedestrian-friendly environment (Planning and Regulatory Improvements);
- encouraging higher density downtown through review of current City zoning (Planning and Regulatory Improvements);

- supporting a vibrant live/work community (Facilitate Citywide Economic Growth and Development); and
- strengthening the orientation to the Pilchuck River for access, views, boating, scenery, and shopping (Support Downtown Revitalization and Redevelopment).

Since the planning process began in 2009, the City has held the following public outreach opportunities allowing the City to develop and refine alternatives for decision-maker consideration as well as analysis in this EIS:

- City Council (public meeting): September 1, 2009
- Public open house: November 2, 2009
- Neighborhood meeting: February 11, 2010
- Planning Commission (public meeting): March 3, 2010
- City Council (public meeting): April 6, 2010
- Neighborhood meeting: April 28, 2010
- Design Review Board (public meeting): May 12, 2010
- Parks Board (public meeting): May 26, 2010
- Design Review Board (public meeting): June 16, 2010
- City Council (public meeting): June 15, 2010
- Public meeting (EIS scoping): June 29, 2010
- Design Review Board (public meeting) July 14, 2010
- Planning Commission (public meeting): September 1, 2010
- Planning Commission (public meeting): October 6, 2010
- Planning Commission (public meeting): October 20, 2010
- City Council (public meeting): November 16, 2010
- City Council (public hearing): December 7, 2010
- Planning Commission (public meeting): February 2, 2010
- City Council (public meeting): February 15, 2010
- City Council (public hearing): March 1, 2010
- Planning Commission (public meeting): March 2, 2010

In addition, the City has issued twelve announcements regarding the Pilchuck District subarea planning process in the City Manager's weekly newsletter.

2.1.3 Objectives of the Proposal

The City's objectives for the Pilchuck District were described in framework goals (City of Snohomish 2010). The EIS alternatives are analyzed in this EIS in the context of these goals:

1. Foster a walkable district with a focus on the Centennial Trail as the centerpiece.

2. Encourage a network of public and private open spaces.
3. Encourage investment in the Pilchuck District.
4. Encourage higher density residential development in appropriate places.
5. Promote a residential neighborhood character with allowances for office, retail, and service uses in areas outside of the Second Street corridor.
6. Maintain a primarily commercial character and predominantly commercial land use within the Second Street corridor.
7. Create opportunities for visual or physical access to the Pilchuck River where the environmental sensitivity of the riparian area is protected and property rights are respected.
8. Foster development of a distinctive, generally urban, and uniquely Snohomish place through design standards.
9. Encourage preservation of historic structures where appropriate.
10. Encourage sustainable development practices.
11. Encourage new development to orient to public spaces, such as public sidewalks, public parks, the Centennial Trail, and the Pilchuck River.
12. Encourage retention of existing single-family land uses where appropriate.

A programmatic objective is to create a TDR program, which will include both the policies and procedures to allow TDRs to be purchased and placed in the Pilchuck District. Purchased development rights would be redeemed for an additional increment of height, floor area, or other development standard above the base entitlement in the development regulations. However, all excess development rights obtained through a TDR program will be within the development levels studied in this EIS.

Through this EIS process, the City has identified the following objectives for the Planned Action designation:

- Provide a streamlined SEPA review process for future site-specific development proposals.
- Provide an incentive for development proposals that are consistent with the overall intent of the Pilchuck District vision.
- Provide greater certainty to potential developers, City decision makers, and the general public regarding the future development pattern and likely impacts of future development in the Pilchuck District.

2.2 Environmental Review

2.2.1 Purpose

The purpose of this EIS is to provide a more detailed environmental analysis during this planning stage, rather than at the project permit review stage. This EIS identifies specific environmental impacts and ways to mitigate impacts in advance of development. Advance review will facilitate

development consistent with the vision of the Pilchuck District Plan by streamlining future environmental review and permitting.

The Draft EIS presented a description of two alternatives and an evaluation of the environmental impacts of future land use, transportation, and other public features in the Pilchuck District. Environmental review in the Draft EIS presented impact analysis, and mitigation measures to help decision-makers select among the alternatives or formulate new alternatives.

The role of this Final EIS is to document a Final EIS Preferred Alternative that is similar to the Draft EIS Proposed Alternative. Other key purposes of the Final EIS include responding to public comments made on the Draft EIS and providing corrections to the Draft EIS analysis, as needed. The Final EIS should be read together with the Draft EIS since the Final EIS completes the documentation and process, but does not repeat all the Draft EIS information.

2.2.2 Prior Environmental Review

Environmental review for the City's Comprehensive Plan through an EIS, supplemental EIS, addenda, and determinations of non-significance is documented for each amendment since 1985. A comprehensive list of previous environmental documents related to the Comprehensive Plan is provided in the Fact Sheet.

When appropriate, prior environmental documents were considered in the preparation of the Draft EIS and Final EIS.

2.2.3 Draft and Final EIS

The purpose of the Draft EIS issued in October 2010 was to assist public and agency decision makers in considering the Pilchuck District Subarea Plan, related amendments to the Comprehensive Plan, development code amendments and design standards, and the proposed Planned Action Ordinance.

The Draft EIS addressed elements of the natural and built environment. It compared impacts of and mitigation for the "No Action" alternative as well as the Proposed Alternative. The alternatives have been analyzed programmatically for potential impacts on the natural and built environment. Environmental topics were identified through a scoping process in June and July 2010, and included Hazardous Materials; Land Use; Aesthetics; Transportation; Cultural Resources; Stormwater; Sewer and Water; and Police, Fire, Parks and Recreation and School Services. The Draft EIS also provided a vehicle for public input regarding decisions relative to planning and development in the City via a public comment period (October 2010).

The Final EIS completes the environmental review process by revising or clarifying portions of the analysis and responding to comments on the Draft EIS. The Final EIS also introduces and reviews another alternative called the Final EIS Preferred Alternative, which is similar to the Proposed Alternative.

2.3 Proposed Alternatives

The alternatives studied in the Draft EIS are the No Action Alternative and the Proposed Alternative. The No Action Alternative would retain the current Comprehensive Plan and development regulations. Development would continue as currently permitted, with a wide range of permitted

uses. The SEPA review process would not be streamlined via a Planned Action Ordinance; standard review would be required on a per-project basis. The Proposed Alternative would include Comprehensive Plan and regulatory amendments to implement the proposed goals statements listed in Section 2.1 of this Final EIS.

The two primary alternatives represent “bookends” for a range of possible growth levels and locations in the study area. The City Council has evaluated two conceptual land use maps for the study area and provided guidance on the general location and potential intensity of future development. However, City Council concurrence was not achieved on maximum building heights. Therefore, the Draft EIS evaluated a high-intensity scenario as the Proposed Alternative.

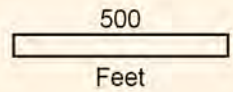
The Final EIS Preferred Alternative proposes similar land uses, and similar development and design regulations as the Proposed Alternative. The Final ES Preferred Alternative creates a subarea plan with the following elements:

- Comprehensive Plan land use map amendments establishing the Pilchuck District (Figure 2-1),
- Comprehensive Plan policy amendments (Final EIS Appendix A),
- A regulating plan that serves as a zoning map (Figure 2-2),
- Form-based code regulations (Final EIS Appendix B), and
- Design standards (Final EIS Appendix C).



Pilchuck District Figure 2-1

- SFR** Single Family Residential
- LDR** Low Density Residential
- MDR** Medium Density Residential
- HDR** High Density Residential
- MU** Mixed Use
- HB** Historic Business
- OS** Open Space
- Pilchuck District Boundary



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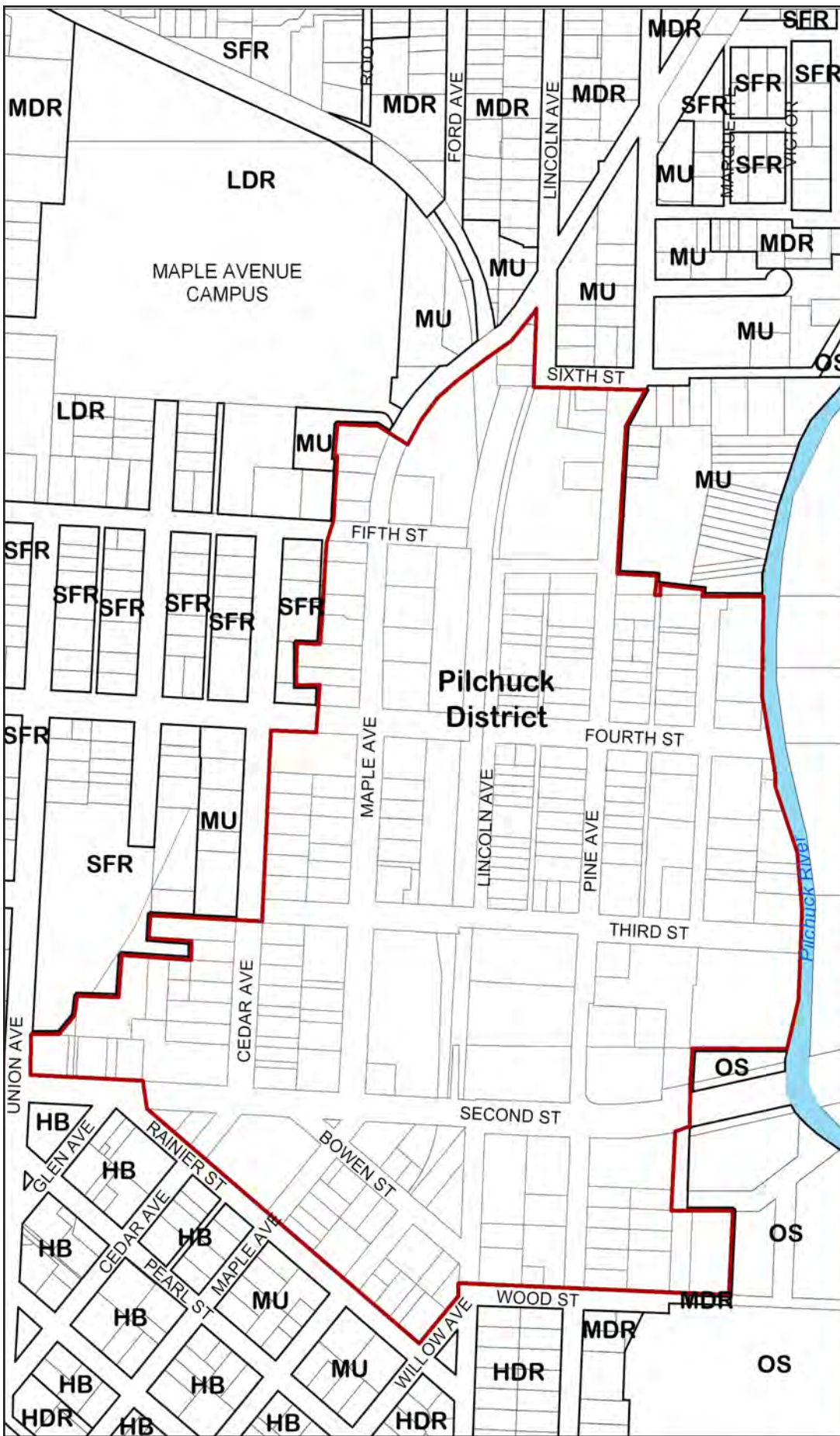
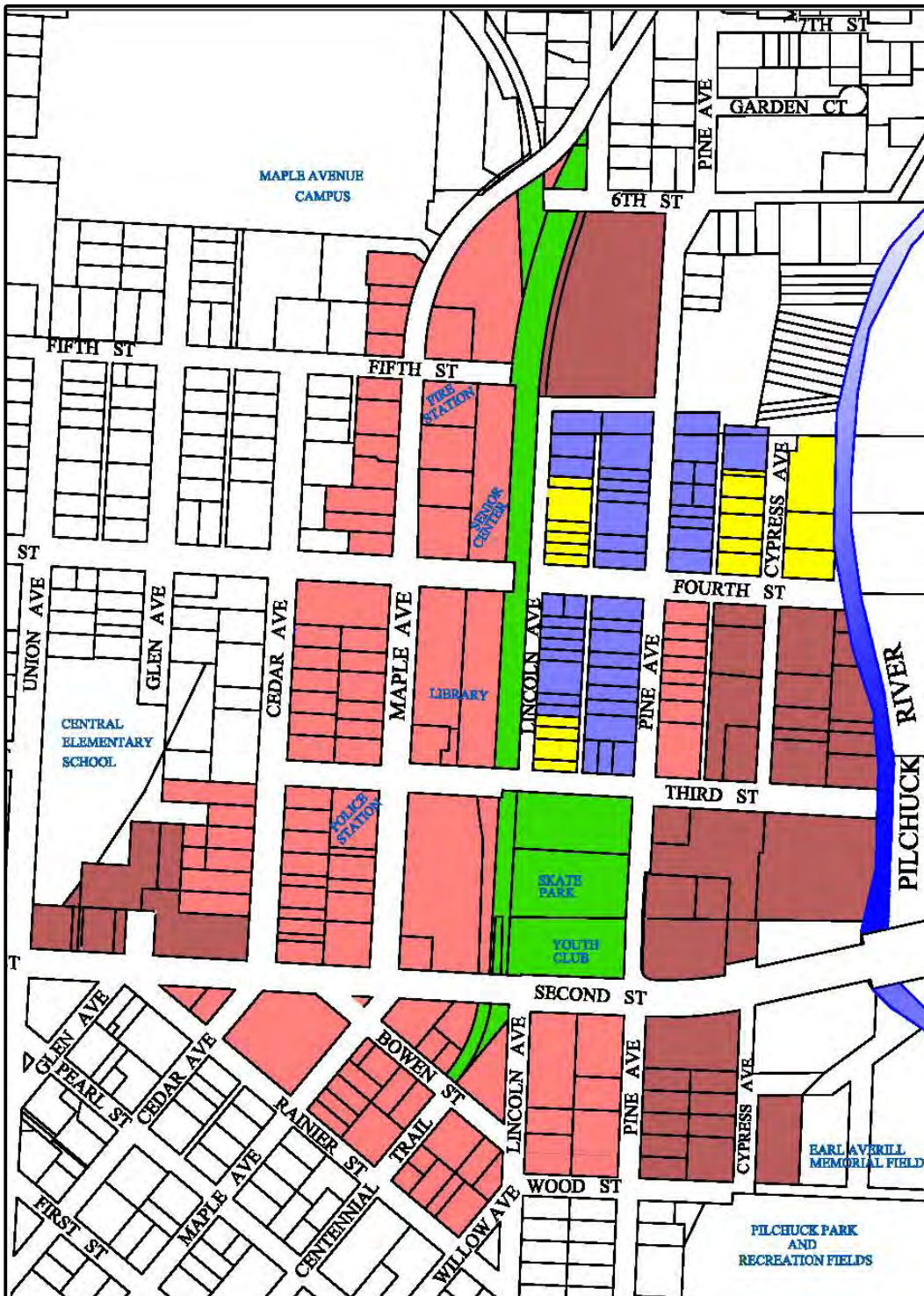


Figure 2-1. Pilchuck District Land Use Designation



**Pilchuck District
Figure 2-2**



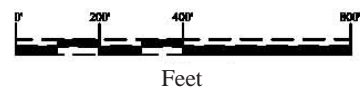
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- Neighborhood Single-Family
- Neighborhood Townhouse
- Neighborhood Center
- Neighborhood Center with Height Overlay
- Civic



Revised January 4, 2011



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Figure 2-2. Pilchuck District Regulating Plan

Table 2-1 shows the same land capacity results for the Final EIS Preferred Alternative as for the Proposed Alternative, except that two more lots currently in single-family use would transition to townhomes with the Final EIS Preferred Alternative.

Table 2-1 shows how the Final EIS Preferred Alternative and the Proposed Alternative would increase dwelling capacity and moderately add jobs; the conversion to mixed uses would reduce single-family dwellings in some parts of the district, though specific areas of single-family dwelling would be preserved unlike the No Action Alternative. Conversely, the No Action Alternative would not provide as much new multifamily dwellings, potentially remove more single-family dwellings, and provide somewhat greater jobs than the Proposed Alternative. Under the No Action Alternative, there would be mixed uses in the neighborhood as a whole but not on a site-by-site basis as there would be under the Proposed Alternative.

Table 2-1. Alternative Estimated Growth for the Pilchuck District

Use	Proposed Alternative/ Final EIS Preferred Alternative Net Change	No Action Alternative Net Change¹
Multifamily Dwellings	1,364	209
Single-Family Dwellings ²	-60 to -62 ³	-98
Estimated Population	2,355	112
Retail Square Feet	109,508	301,704
Office Square Feet	76,688	62,726
Estimated Jobs	376	610

¹ The No Action Alternative is based on current Comprehensive Plan Transportation Element estimates for transportation analysis zones (TAZs) 6, 7, and 10 adjusting for study area boundaries. Proposed Alternative estimate is based on properties considered redevelopable, application of prototype developments, and household and employee per square foot assumptions consistent with Comprehensive Plan land capacity analysis and Pilchuck District Capacity Methodology and Assumptions (Draft EIS Appendix F).

² The No Action Alternative transportation analysis assumes a loss of eight single family dwellings consistent with transportation plan assumptions. However, current zoning allows for single-family conversion. Achieving the forecast growth for the No Action Alternative has the potential to result in the elimination of 98 single-family dwellings in single-family use or on properties with a mix of structure types and uses.

³ The Final EIS Preferred Alternative would convert two more single-family homes to townhomes than the Proposed Alternative.

Table 2-2 compares the Draft EIS alternatives across all features. Sections 2.5.2 and 2.5.3 of the Draft EIS provide further information on these two alternatives. The Final EIS Preferred Alternative is also included in Table 2-2 and more fully described in the following pages.

Table 2-2. Alternatives Comparison

Feature	No Action Alternative	Proposed Alternative	Final EIS Preferred Alternative
Comprehensive Plan	Maintains the adopted Comprehensive Plan last amended in 2009.	Adopts the Pilchuck District Subarea Plan. Revises the adopted Comprehensive Plan and Land Use Designation Map with new and revised land use designations. See Draft EIS Section 3.2, Land Use Patterns/Plans and Policies, for additional discussion of other plan amendments.	Same as Proposed Alternative. See Final EIS Section 3.2 Land Use Patterns/Plans and Policies for additional discussion and FEIS Appendix A for detailed policy amendments.
Comprehensive Plan Land Use Designations	Retains current designations in study area, which include Mixed Use, Commercial, and Medium Density Residential.	Within the study area, new and existing land use designations would apply. In most areas, the designations would allow residential and employment uses. The policy emphasis within the Second Avenue corridor would continue to emphasize commercial uses. Outside of the Second Street corridor, the policy emphasis would be residential with allowances for compatible employment uses. Areas along Lincoln, Pine, and Cypress avenues between Third and Fifth streets, excluding larger parcels, would be designated for either single-family or townhouse development. In these areas, the target densities would be lower and the range of uses significantly smaller than the No Action Alternative.	The land use designation is Pilchuck District (Figure 2-1) with the following description that is a similar intent as the Proposed Alternative: The Pilchuck District land use designation is envisioned to appear and function as a traditional, compact, and walkable neighborhood, an “urban village,” within the context of the larger Snohomish community. The intent is to achieve a mix of land uses within the area to reduce the need for automobile trips required to meet the daily needs of residents. Land uses will be designed for compatibility and will include a variety of residential, commercial, and recreational activities. Development may take a various forms, from single-family homes to townhomes to four- and five-story residential, mixed-use, and office buildings.
Zoning Designations	Same as above.	Same as above.	Same as Proposed Alternative in terms of locations for commercial and mixed use areas. The Final EIS Preferred Alternative adds two more lots as Neighborhood Townhouse uses rather than

Feature	No Action Alternative	Proposed Alternative	Final EIS Preferred Alternative
Zoning Standards	<p>Provides a traditional zoning approach where code focuses more on specification of allowed land uses and less on building form. The current range of residential, commercial, and industrial land uses would continue. Current dimensional standards—height, setback, lot coverage, and density—would apply. All portions of the study area are currently allowed a maximum height of 35 feet and a maximum density of 18 units per acre. Under this alternative, parking standards would be retained and existing design standards would continue.</p>	<p>Proposes a form-based code that focuses on design of buildings and relationship to streets. Low-intensity, land-consumptive, auto-oriented land uses would be discouraged in favor of higher-intensity uses compatible with residential uses. Amends dimensional standards. Maximum heights would vary across the study area, from 35 feet to about 55 feet, depending on location. Areas proposed for single-family and townhouse development would have no change in the current maximum building height. Areas allowing a mix of uses would have greater maximum heights. Allowed building heights in excess of the current standards would be stepped back away from adjacent streets and lower-intensity designations to reduce the impression of massing from off-site areas. Parking standards would be reduced, accounting for a more pedestrian-friendly environment. New development regulations would apply to ensure compatibility and desired character.</p>	<p>Neighborhood Single Family Uses. As part of a form-based code, it establishes a “Pilchuck District Regulating Plan” that serves as a zoning map (Figure 2-2).</p> <p>Proposes a form-based code similar to the Proposed Alternative, but with more detail. Areas proposed for single-family and townhouse development would have no change in the current maximum building height. Areas allowing a mix of uses would have greater maximum heights. Maximum heights would vary across the study area from 3 to 5 stories similar to the Proposed Alternative though floor heights may result in buildings that achieve 53 feet (3 stories) to 81 feet (five stories), depending on location. Stories above the third story would be stepped back away from adjacent streets and lower-intensity designations to reduce the impression of massing from off-site areas. Parking standards would be reduced, accounting for a more pedestrian-friendly environment.</p> <p>New development regulations would apply to ensure compatibility and desired character. The regulations would implement the urban form promoted in Comprehensive Plan amendments for the Pilchuck District:</p> <p>“Prescribed urban form will emphasize:</p> <ul style="list-style-type: none"> • streets and sidewalks designed for on-street parking; pedestrian convenience, comfort and safety; and emergency access; • the relationship of buildings to

Feature	No Action Alternative	Proposed Alternative	Final EIS Preferred Alternative
			<p>the public sidewalk to create continuous, active, interesting, and intimate streetscapes;</p> <ul style="list-style-type: none"> • minimizing in the prominence of parking facilities; and • continuing the appearance of small-scale building forms that characterize the community.” <p>Design guidelines are specifically prepared for the subarea (Final EIS Appendix C).</p>
Planned Action Ordinance	Maintain standard SEPA review process for individual site-specific development proposals.	Designates the study area as a Planned Action and allows streamlined environmental review of individual development proposals that are consistent with the Planned Action. Facilitates future development permit procedures with advanced environmental review by adopting a Planned Action Ordinance.	Same as the Proposed Alternative.
Capital Improvements	Includes capital improvements identified in the City’s Comprehensive Plan Capital Facilities Element and Capital Improvement Plan. Design and construction of the Centennial Trail segment through the study area would occur.	Includes the capital improvements listed under the No Action Alternative. Recommends new capital improvement projects, particularly street and pedestrian improvements, to the City’s Capital Improvement Program. Updates to the Capital Facilities Element would be evaluated. Provides new street design standards for the study area. Design and construction of the Centennial Trail segment through the study area would occur.	Similar to the Proposed Alternative in concept of multiple modal transportation improvements, except that street typologies have been further refined. Other capital improvements such as water and sewer would be similar to the Proposed Alternative given similar growth projections.

2.3.1 Final EIS Preferred Alternative

The Proposed Alternative allowed the City to consider an alternative growth pattern to the No Action Alternative, and through public comment opportunities, the Final EIS Preferred Alternative was developed responding to the community dialogue. Specific to the Pilchuck District and within the Proposed Alternative's Draft Subarea Plan Framework Elements (Draft EIS Appendix D), the Final EIS Preferred Alternative provides more details about proposed Comprehensive Plan policy amendments, form-based height, setback, and other zoning standards, and design standards (Final EIS, Appendix C) intending to achieve the vision of a lively, walkable neighborhood of shops, personal and business services, offices, single-family homes, townhouses, and stacked flat apartments.

Although more detailed, the Final EIS Preferred Alternative is similar to the Proposed Alternative studied in the Draft EIS with the following features:

- **Land Use Pattern:** Overall proposed land use pattern focuses on preferred uses such as single-family, townhouses, stacked flat apartments, retail, personal and professional services, office uses, and guest accommodations such as hotels, motels and conference centers;
- **Land Capacity:** Consistent future land capacity estimates with mixed use and townhouse developments in similar locations and protecting more single family homes from conversion than the No Action Alternative;
- **Zoning Approach:** Form-based code zoning approach creates a predictable urban form and emphasizes building and public space standards. Parking standard reductions are proposed where justified according to anticipated demand. Off-street parking credit may be granted for adjacent on-street spaces for small uses. Off-street parking beside, behind, or beneath structures would be required. Lot coverage (impervious surface) standards would be up to 90% of site area, slightly less but similar concept as the Proposed Alternative;
- Planned action ordinance facilitates development consistent with the EIS analysis (Final EIS Appendix D); and
- Capital improvements for streets, water, and sewer that support the proposed land use plan and predicted growth.

The Final EIS Preferred Alternative differs from the Proposed Alternative in the following ways:

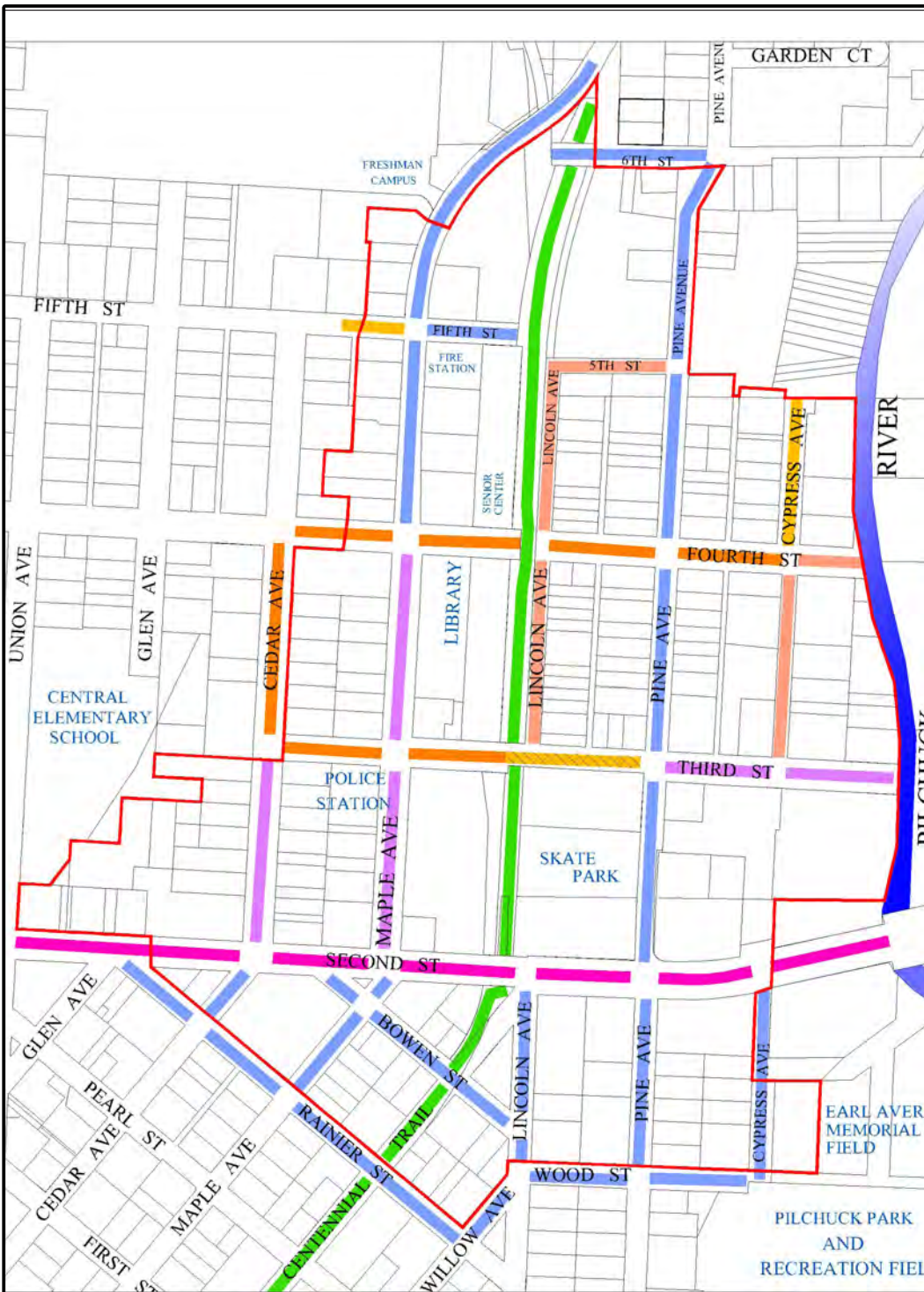
- **Extent of Neighborhood Townhouse Land Use/Zoning District:** Along Lincoln Avenue south of Fifth Street, two more lots are shown for Neighborhood Townhouse uses rather than Neighborhood Single Family Uses. The land capacity estimates are not anticipated to vary from the Proposed Alternative because the capacity estimates were conservative in estimating up to 98 new townhouse units in the neighborhood.
- **Measurement of Height:** Commonly mixed use buildings have ground floors of 15 feet in height and upper stories of 10 feet in height. Single-purpose buildings may have ground floors of 12 to 15 feet in height and upper stories of 10 feet in height. Both alternatives have a similar range of maximum stories—3 to 5 stories—but height is measured differently. The Proposed Alternative assumed an overall building height maximum; whereas, the Final EIS Preferred Alternative establishes maximum elevations of each story. The maximum floor-to-ceiling heights would be 25 feet for a ground floor and 14 feet for upper stories, which may result in greater total

maximum building heights under the Final EIS Preferred Alternative (maximums of 53 feet for three stories and 81 feet for five stories) than the Proposed Alternative (maximum of 55 feet). Given common construction practices and the requirement to purchase development rights in order to exceed three stories, it is unlikely that all buildings would use maximum floor heights under the Final EIS Preferred Alternative. In addition the proposed design standards are intended to reduce apparent height and bulk with upper story setbacks and other measures.

- **Street Classifications:** Both alternatives intend to provide for multiple modes of travel in the district and in particular improve pedestrian, bicycle, and transit access. The Final EIS Preferred Alternative proposes a hierarchy of street types similar to the Proposed Alternative (Draft EIS Appendix D) though some of the dimensional standards and the location of the street segment classifications vary. Figure 2-3 shows the proposed street types and design of the Final EIS Preferred Alternative.



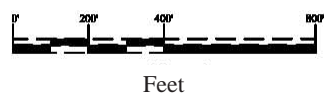
Pilchuck District Figure 2-3



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Second Street		Pedestrian Street	
80' Access Street		Pedestrian Street (Alternative)	
60' Access Street		Centennial Trail	
80' Neighborhood Street		Pilchuck District Boundary	
60' Neighborhood Street			



November 28, 2010

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Figure 2-3. Pilchuck District Street Types

Chapter 3

Analysis of the Final EIS Preferred Alternative

This chapter provides an abbreviated summary review of the potential impacts of development that might occur under the Final EIS Preferred Alternative described in Chapter 2. The review follows the same structure as Chapter 3 of the Draft EIS where the other alternatives were reviewed. For each of the eight resources (hazardous materials; land use patterns/plans and policies; aesthetics; transportation; cultural resources; stormwater; sewer and water; and police, fire, parks, and schools), the review is organized as follows:

- Impacts specific to the Final EIS Preferred Alternative are described. Impacts common to all alternatives were described in Chapter 3 of the Draft EIS and are not repeated here.
- Mitigation Measures specific to the Final EIS Preferred Alternative are described. Mitigation measures common to all alternatives were described in Chapter 3 of the Draft EIS and are not repeated here.

3.1 Hazardous Materials

Under all studied alternatives, the City as a whole, and the study area in particular, would experience growth and thus an increase in the potential to encounter soil and/or groundwater contamination from historic or current use of hazardous materials. The Final EIS Preferred Alternative is estimated to have similar impacts as the Proposed Alternative since it has the same growth projections and general design and construction requirements. Anticipated impacts of the Final EIS Preferred Alternative include:

- **New Development:** Ground disturbing activities (excavation and grading) associated with re-development can increase the exposure of workers to hazardous materials and spread of contamination into clean soil and groundwater. A slight reduction of lot coverage (impervious surface) standards of the Final EIS Preferred Alternative when compared with the Proposed Alternative – reduced from up-to 100% to up-to 90% of the site area - may reduce the overall amount of ground disturbing activities at re-development sites; thereby slightly reducing the potential to spread contamination and expose construction workers.
- **Incorporated Plan Features:** Increasing building heights could reduce the horizontal footprint of the structure (i.e., building up rather than out), thereby reducing the impact of ground-disturbing activities and reducing the potential to encounter contaminated soil.

3.2 Land Use Patterns/Plans and Policies

3.2.1 Land Use Patterns

The Final EIS Preferred Alternative would foster a similar mix of land uses as the Draft EIS Proposed Alternative, focusing on the creation of a walkable “urban village” that includes a variety of residential types, mixed-use commercial establishments, and office buildings. Rather than implementing a set of new comprehensive plan land use designations and zoning designations, as

described under the Draft EIS Proposed Alternative, the Final EIS Preferred Alternative would create a single “Pilchuck District” designation with the same intended land use mix. Land use patterns under the Final EIS Preferred Alternative are anticipated to be similar to the Draft EIS Proposed Alternative.

3.2.2 Land Use Compatibility

Similar to the Draft EIS Proposed Alternative, the Final EIS Preferred Alternative would implement a form-based zoning code to govern development within the Pilchuck District. A stated purpose of the Pilchuck District Design Standards proposed as part of the Final EIS Preferred Alternative is to foster visual compatibility between adjacent uses. The regulating plan included in the Final EIS Preferred Alternative (Figure 2-2), shows a clustering of use intensities that, similar to the Draft EIS Proposed Alternative, will reduce the potential for incompatibilities within the district. While the introduction of higher densities and higher-intensity uses in the Pilchuck District has the potential to create incompatibilities with adjacent development outside the district or with low-intensity uses within the district, these can be mitigated through application of the proposed design standards and form-based code.

3.2.3 Employment and Housing Mix

The Final EIS Preferred Alternative would result in the same net change in population and employment as the Draft EIS Proposed Alternative.

3.2.4 Mitigation Measures

Most of the mitigation measures identified for the Draft EIS Proposed Alternative would also apply to the Final EIS Preferred Alternative, with the exception of incorporated plan features. Please see Chapter 1 for distinctions regarding the applicability of mitigation measures. The Final EIS Preferred Alternative includes a larger set of Comprehensive Plan Land Use Goal and Policy amendments and more detailed development and design regulation proposals than the Draft EIS Proposed Alternative (Final EIS Appendix A). However, the intent of the Final EIS Preferred Alternative policies and regulations is the same as for the Proposed Alternative: to create a walkable, mixed-use district that promotes community character, encourages preservation of historic structures, and fosters environmentally sustainable development practices.

3.3 Aesthetics

3.3.1 Visual Character/Height and Bulk

Similar to the Draft EIS Proposed Alternative, the greatest potential for visual character impacts under the Final EIS Preferred Alternative would result from increases in maximum allowed building heights. The Final EIS Preferred Alternative would allow a range of building heights from three to five stories, which is similar to the Draft EIS Proposed Alternative. However, zoning regulations proposed under the Final EIS Preferred Alternative would allow taller individual stories. A five-story building under the Final EIS Preferred Alternative could achieve up to 81 feet, compared to approximately 55 feet under the Draft EIS Proposed Alternative. This additional height has the potential to alter the visual character of Pilchuck District by increasing conflicts of scale between

new development and existing low-rise structures. While the Final EIS Preferred Alternative would require development over three stories to purchase development rights, and thus may limit the number of developments where heights above three stories would occur, the application of design standards to reduce height and bulk impacts would still be necessary to mitigate impacts of developmental scale.

3.3.2 Light and Glare

The form and intensity of development under the Final EIS Preferred Alternative is anticipated to be similar to the Draft EIS Proposed Alternative. The Final EIS Preferred Alternative would not result in a substantially larger increase in ambient light and glare, and the proposed Pilchuck District Design Standards (Final EIS Appendix C) contain regulations for the use of exterior illumination that would mitigate the effects of additional development.

3.3.3 Views

As described in the Draft EIS, most views from or through the Pilchuck District are already obstructed by vegetation and existing development. Redevelopment of the district with more recreational space along the river and taller buildings that could provide territorial views was identified as a positive impact of the Draft EIS Proposed Alternative, and the Final EIS Preferred Alternative would accomplish the same result.

3.3.4 Shading Conditions

Similar to the Draft EIS Proposed Alternative, redevelopment of the Pilchuck District under the Final EIS Preferred Alternative would introduce taller buildings than currently existing in the area, which has the potential to alter shading conditions. Similar to the Draft EIS Proposed Alternative, summer shading would be limited to the immediate footprint of each building, but winter sun angles produce much longer shadows.

Final EIS Appendix E shows a comparison of estimated shading conditions between the Draft EIS Proposed Alternative and the Final EIS Preferred Alternative. Shadows were modeled for morning, noon, and evening times under summer, winter, spring, and autumn sun angles. Based on this modeling, shading conditions under the Final EIS Preferred Alternative are anticipated to be similar to the Draft EIS Proposed Alternative during summer months, though shading effects would be slightly more pronounced in spring and autumn. Winter shading is estimated to be greatly increased over existing conditions under both the Draft EIS Proposed Alternative and the Final EIS Preferred Alternative. The application of design standards and other mitigation measures would be necessary to alleviate potential shading of public spaces and adjacent lower structures.

3.3.5 Mitigation Measures

Mitigation measures for aesthetic impacts under the Final EIS Preferred Alternative would consist primarily of the application of the proposed Pilchuck District Design Standards. These standards incorporate many of the potential aesthetic mitigation measures recommended in the Draft EIS, specifically methods to reduce massing such as required upper-story setbacks above three stories, roof-form variation, and façade modulation. The complete Pilchuck Design Standards are included in Final EIS Appendix C.

However, even with the application of design standards, the Final EIS Preferred Alternative proposes a measurement of stories that would result in additional height that has the potential to increase shading effects at certain times of the year, and to which single-story buildings would be particularly susceptible. In addition to the proposed design standards associated with the Final EIS Preferred Alternative, the City could further mitigate shading impacts to single-family residences by implementing additional upper-story setback requirements or requiring site-specific shading studies at the time of development application where new development in the Pilchuck District would exceed 55 feet and would be located across the street from a single-family zone or adjacent to a public park.

3.4 Transportation

Under all studied alternatives, the City as a whole, and the study area in particular, would experience growth and thus an increase in traffic volumes resulting in a lower LOS for certain intersections. The Final EIS Preferred Alternative is estimated to have similar impacts as the Proposed Alternative since it has the same growth projections.

3.4.1 Roadway Operations

Anticipated roadway operations impacts of the Final EIS Preferred Alternative include four deficient intersections within the study area. The following four study intersections are projected to exceed the City's adopted level of service (LOS) standard (LOS E) during the PM peak hour in 2030:

- Third Street/Pine Avenue
- Fourth Street/Maple Avenue
- Fourth Street/Pine Avenue, and
- Maple Avenue/Pine Avenue.

Mitigation measures identified for the Proposed Alternative would similarly apply to the Final EIS Preferred Alternative.

3.4.2 Parking

As part of the Final EIS Preferred Alternative, the Pilchuck District development code includes parking standards intended to provide an adequate parking supply while ensuring that parking facilities do not a) become a dominant visual element of the Pilchuck District or otherwise detract from the intended urban form; or b) unduly consume land that may be employed for more active use. Parking regulations specific to the Pilchuck District include:

- Parking is to be accessed by rear alleys wherever feasible, or from a side street
- Where feasible, parking access should be consolidated for multiple sites
- Only one access point to parking facilities is to be permitted for a lot with a detached single-family dwelling.
- For buildings greater than 3 stories in height, a minimum of 50% of required parking spaces are to be located within structured parking.

- In any building, 1,500 square feet or 30%, whichever is less, of ground-floor retail, office, and service uses adjacent to and accessed directly from a public street would be exempt from the off-street parking standards. Except as exempted for ground-floor commercial, non-residential uses would be subject to the Historic Business District standard of one space per 400 square feet of gross floor area.
- On-street parking is encouraged to provide convenient parking and to separate moving vehicles from sidewalks.
- Joint use parking facilities may be permitted.

These proposed standards are more specific than the Proposed Alternative and help fulfill the vision for the district as a pedestrian-oriented, walkable mixed use area.

3.4.3 Non-Motorized Circulation

Under the Final EIS Preferred Alternative, some of the existing roadways would be upgraded and would need to meet the City's street design standards. Pilchuck District street types and designs vary according to the available right-of-way, the adjacent urban use and form, and the functional requirements of the roadway. In all cases, roadways are intended to provide for both motorized and non-motorized transportation modes with slower design speeds to ensure the safety of pedestrians, bicyclists, and motorists.

The proposed street standards in the Final EIS Preferred Alternative are similar to the Proposed Alternative public realm plan. Street standards for Neighborhood, Access, and Community Corridor types include on-street parking, ample sidewalks, pedestrian lighting, and street trees. Intersection design for these classifications includes frequent bulb-outs to promote the safety and convenience of pedestrians and to emphasize slow traffic speeds. The woonerf or pedestrian street type is intended to allow vehicle access as secondary to pedestrian and bicycle access. Due to its intended function, woonerfs do not require separated sidewalks, and the design, including form, relationship of elements, features, and materials will be individually adapted to each circumstance based on the needs of adjacent development, emergency access, anticipated secondary functions of the right-of-way, and community input.

Neighborhood Street design provides attractive streets with ample sidewalks for pedestrian comfort and interaction where adjacent development is primarily residential. Sidewalks would be separated from travel lanes by on-street parking and a tree planting strip. Travel lanes would be marked at the minimum width necessary for safe passage to encourage slow speeds. Where adequate area for bicycles is not available outside of travel lanes, the lanes would be marked with sharrow symbols to remind motorists of the presence of bicycles. Private frontages along Neighborhood Streets would be designed to include moderate setbacks providing spaces for porches, gardens and lawns for both privacy and connection to the public way.

Sidewalks within the Pilchuck District are anticipated to be a minimum of eight feet wide. Adjacent to commercial and higher-density multi-family uses, sidewalks would be as wide as available right-of-way will allow to provide a dynamic and flexible public space. Intersections should have pedestrian bulb-outs, clear demarcation of crosswalks, and other measures, as appropriate, to promote safe passage. Pedestrian connections to the Centennial Trail are encouraged, but should be consolidated and controlled to promote access safety.

Planned bicycle routes include: Bowen Street (between Lincoln Avenue and Centennial Trail); Cypress Avenue (between Wood St and Second Street); Fourth Street (between Cedar Avenue and Pine Avenue); Lincoln Avenue (between Wood Street and Bowen Street); Second Street (Lincoln Avenue to the Pilchuck River); Sixth Street (between Maple Avenue and Pine Avenue); Wood Street (between Lincoln Avenue and Cypress Avenue).

3.4.4 Transit

Under the Final EIS Preferred Alternative, land uses along Second Street that benefit from visibility by large volumes of traffic, convenient vehicular access, and direct access to public transit are encouraged.

3.5 Cultural Resources

Similar to the Proposed Alternative and the No Action Alternative, the Final EIS Preferred Alternative could result in typical project impacts that could disrupt or adversely affect cultural resources including:

- demolition, removal, or substantial alteration without consideration of historic and archaeological sites and/or features;
- incompatible massing, size, scale, or architectural style of new development on adjacent properties;
- obstruction or extensive shading of significant views to and from a resource by new development;
- incompatible use of an existing building or structure;
- disruption of integrity of setting; and
- long-term loss of access to the property.

All studied alternatives accommodate future growth in the study area: the No Action Alternative on the low end and the Proposed/Final EIS Preferred Alternative on the high end. Development to accommodate this growth could occur on any property in the study area under any of the studied alternatives. Therefore, potential impacts on unknown cultural resources would be the same under studied alternatives, although the likelihood of those impacts would vary.

The Final EIS Preferred Alternative, similar to the Proposed Alternative, supports a higher level of growth in the study area than the No Action Alternative, necessitating a corresponding higher level of development, and is more likely to have impacts on cultural resources.

The Final EIS Preferred Alternative, similar to the Proposed Alternative, includes a Planned Action Ordinance that would exempt from future SEPA threshold determinations and EISs those projects that are consistent with the projects and parameters analyzed in this EIS. The Final EIS Preferred Alternative includes proposed form based code amendments in Appendix B that apply provisions of the City's Historic District Regulations regarding design and demolition to the Pilchuck District, similar to several of the Draft EIS mitigation measures.

The Final EIS Preferred Alternative, similar to the Proposed Alternative, but to a greater level of detail includes design standards tailored to the study area, which are intended to produce compatible development.

3.6 Stormwater

Under all studied alternatives, the City as a whole, and the study area in particular, would experience growth and thus an increase in the potential to impact stormwater runoff quantity and quality. The Final EIS Preferred Alternative is estimated to have similar impacts as the Proposed Alternative since it has the same growth projections and general design and construction requirements.

Anticipated impacts of the Final EIS Preferred Alternative compared to the Proposed Alternative include:

- Lot coverage (impervious surface) standards of the Proposed Alternative were reduced in the Final EIS Preferred Alternative from up-to 100% to up-to 90% of the site area, depending on the type of development. As described in the Draft EIS, additional stormwater runoff is generated from precipitation running off of impervious surfaces. This slight reduction in allowed impervious surface could decrease the amount of stormwater runoff generated when compared to the Proposed Alternative.

3.7 Sewer and Water

Under all studied alternatives, the City as a whole, and the study area in particular, would experience growth and thus an increase in demand for water and sewer collection and treatment services. The Final EIS Preferred Alternative is estimated to have similar impacts as the Proposed Alternative since it has the same growth projections. Anticipated impacts of the Final EIS Preferred Alternative include:

- **Water:** Due to the concentration of new development in the study area under the Preferred Alternative, increases in water demand would be felt primarily in the 222 pressure zone, which contains the study area.
- **Fire Flow:** Under the Preferred Alternative, replacement and additional water mains would be necessary to meet fire flow requirements under the International Fire Code for the type and scale of potential development identified for the Pilchuck District. Inadequate fire flow would be an impact to implementation of the Pilchuck District Subarea Plan and development regulations. Implementation of water system improvements similar to the No Action Alternative would reduce impacts.
- **Wastewater:** The 2005 Facility Plan recommends an improvement plan to the Rainer Lift Station, which would address the additional growth in the study area, meeting the Final EIS Preferred Alternative's additional growth demand.

3.8 Police, Fire, Parks, and Schools

Under all studied alternatives, the City as a whole, and the study area in particular, would experience growth and thus an increase in demand for police, fire, parks, and schools services. Increases in population density under all studied alternatives including the Final EIS Preferred Alternative could increase the number of calls for police and medical emergency services and the use of existing school and park and recreation facilities. Increases in traffic related to growth under both alternatives could affect the response time of emergency vehicles. Increases in vehicle and pedestrian traffic could result in the need for additional traffic enforcement. The Final EIS Preferred Alternative is estimated to have similar impacts as the Proposed Alternative since it has the same growth projections. Anticipated impacts of the Final EIS Preferred Alternative include:

- **Police Protection:** Future development would result in an incremental increase in calls for emergency service. Increased retail and office establishments could result in increased crimes of shoplifting and fraud at a rate similar to other city businesses. The effects are estimated to be similar to the Proposed Alternative because the Final EIS Preferred Alternative includes a similar land use pattern and growth estimates.
- **Fire and Emergency Medical Service:** Future development and commensurate increases in population and jobs could result in increases in the Fire District 4 fire and EMS call load relative to the existing conditions and the No Action Alternative; this is the case for the Preferred and the Proposed Alternatives which have similar growth projections. Fire District 4 has recommended procedural and building code enforcement measures to mitigate the added difficulty of fire suppression and extraction of residents from buildings four stories and taller (see Mitigation Measures in Chapter 1).
- **Parks and Recreation:** The Final EIS Preferred Alternative, similar to the Proposed Alternative, would support a larger resident and employment population, increasing demand for park and recreation facilities in the area. Similar to the Proposed Alternative, the Final EIS Preferred Alternative would result in the need for two additional softball diamonds and one additional basketball court beyond the current deficits.
- **Schools:** Development under the Final EIS Preferred Alternative is anticipated to occur gradually. Furthermore, district-wide, classroom capacity is currently available to absorb the additional increment of student growth that would result from development of the residential capacity of the Final EIS Preferred Alternative, which is the same as the Proposed Alternative.

Chapter 4

Clarifications and Corrections to Draft EIS

This chapter includes Draft EIS clarifications or corrections based on responses to the comments presented in Chapter 5 of this Final EIS or based on City or consultant review of the Draft EIS information. The clarifications or corrections are organized in the same order as the Draft EIS sections and by page numbers. The sources of the clarifications or corrections are noted for each amendment. The clarifications or corrections do not change the relative impacts of the Draft EIS alternatives or the overall Draft EIS conclusions.

4.1 Fact Sheet and other Front Matter

No clarifications or corrections are included.

4.2 Draft EIS Chapter 1

Where appropriate, changes made to other chapters or subsections identified below are made in track changes in Chapter 1, Environmental Summary, Table 1-1.

4.3 Draft EIS Chapter 2

A consistency correction was made to Table 2-3; elsewhere in the Draft EIS the height of the Proposed Alternative is described as 55 feet:

Table 4-1. Alternatives Comparison

Feature	No Action Alternative	Proposed Alternative
Zoning Standards	Provides a traditional zoning approach where code focuses more on specification of allowed land uses and less on building form. The current range of residential, commercial, and industrial land uses would continue. Current dimensional standards—height, setback, lot coverage, and density—would apply. All portions of the study area are currently allowed a maximum height of 35 feet and a maximum density of 18 units per acre. Under this alternative, parking standards would be retained and existing design standards would continue.	Proposes a form-based code that focuses on design of buildings and relationship to streets. Low-intensity, land-consumptive. Auto-oriented land uses would be discouraged in favor of higher-intensity uses compatible with residential uses. Amends dimensional standards. Maximum heights would vary across the study area, from 35 feet to about 60 55 feet, depending on location. Areas proposed for single-family and townhouse development would have no change in the current maximum building height. Areas allowing a mix of uses would have greater maximum heights. Allowed building heights in excess of the current standards would be stepped back away from adjacent streets and lower-intensity designations to reduce the impression of

Feature	No Action Alternative	Proposed Alternative
		massing from off-site areas. Parking standards would be reduced, accounting for a more pedestrian-friendly environment. New development regulations would apply to ensure compatibility and desired character.

4.4 Draft EIS Chapter 3

Corrections and clarifications are noted in each subsection below.

4.4.1 Hazardous Materials

Page 3.1-11, Impacts Common to Both Alternatives, Second Paragraph, clarify as follows:

Ground-disturbing activities during construction such as grading, excavation, and/or placement of structures or structure supports sub-grade could disturb known or unknown contaminated areas. If contaminated areas are disturbed, workers, soil, groundwater, and/or surface water could be affected by exposing workers to contamination, spreading ~~contaminates-contaminant~~ to clean soil, or creating a pathway for contaminated soil to travel to groundwater or nearby surface water. These types of activities are possible under both the Proposed Alternative and No Action Alternative.

Page 3.1-13, Safe Drinking Water Act, clarify there are no sole source aquifers in the City of Snohomish:

Safe Drinking Water Act

The Safe Drinking Water Act provides administrative and legal authority to protect public drinking water systems including groundwater. ~~Aquifers designated as Sole Source Aquifers under this act are recognized as being the only source of a community's drinking water.~~

4.4.2 Land Use Patterns/Plans and Policies

Page 3.2-10, Employment and Housing Mix, last paragraph of Proposed Alternative discussion, clarify as follows:

The Land Use Element of the Comprehensive Plan also contains discussion of population targets, ~~capacities,~~ and a breakdown of housing types required to meet GMA allocations and plan vision statements. Adoption of the Proposed Alternative would necessitate revisions to the Land Use Element to update, ~~as appropriate, these~~ population and housing ~~targets~~ capacities as well as land use designation acreages.

Page 3.2-9, Proposed Alternative section, following the description of policy MF 5.14, discuss Policy MF-3, as follows:

Because the Proposed Alternative would allow for stacked flats and mixed-use buildings taller than three stories within the study area, adoption of the Proposed Alternative could potentially conflict with the following Land Use Element policy, which would require revision by the City.

Policy MF 5.14: Maintain a practice that high-rise apartments in excess of three stories will not be allowed within the City at this time.

The Proposed Alternative would allow for density to be controlled by height and lot coverage rather than dwelling units by acre; thus Policy MF 5.14 would require revision to address the different density system in the Pilchuck District:

Policy MF 5.14: Maintain a practice that apartment densities should not exceed 24 units per acre, except for senior housing where it may be 30 units per acre maximum, if it can be shown such development will have low impact on the neighborhood and city services.

4.4.3 Aesthetics

No clarifications or corrections are included.

4.4.4 Transportation

Page 3.4-14, end of 3.4.1 Affected Environment (Response to Comment Sno.Co.-5):

Rail

The Eastside BNSF corridor extends 34 miles from north Renton, through Bellevue and Woodinville, and on to Snohomish. A number of scenarios exist for future commuter and/or excursion rail to operate in the City's urban area using the BNSF corridor right-of-way.

In 2008, the state legislature passed Substitute House Bill 3224, directing Sound Transit and the Puget Sound Regional Council (PSRC) to complete a feasibility study to "determine whether commuter rail service between eastern Snohomish county and eastern King county ... can be a meaningful component of the region's future transportation system".

The resulting BNSF Eastside Corridor Rail Feasibility Study¹ identifies two potential terminus station locations in the City of Snohomish. One of these is within the Pilchuck District, along Lincoln Avenue south of Fourth Street. The station would be located adjacent to the new City Library. An additional siding track at this terminal station was assumed for operational flexibility. It was assumed that all station facilities could be accommodated within the corridor right-of-way and/or existing public right-of-way. The study indicated that this station location could preclude the ability to extend continuous commuter rail service to Everett Station along the BNSF Scenic Subdivision.

The alternative location for the Snohomish station identified in this study is south of the Snohomish River. The study indicated that this alternative location could conceivably provide the potential for the extension of commuter rail service to Everett Station along the Burlington Northern Santa Fe (BNSF) Scenic Subdivision.

¹ Sound Transit / PSRC. *BNSF Eastside Corridor Commuter Rail Feasibility Study: Phase II Technical Memorandum*. Prepared by Parsons Brinckerhoff. December 2008.

4.4.5 Cultural Resources

In response to comments made by the Washington State Department of Archaeology and Historic Preservation, some text was reorganized to keep separate discussions of archaeological and historic resources and to clarify state regulations. Please see Final EIS Appendix F.

4.4.6 Stormwater

No clarifications or corrections are included.

4.4.7 Sewer and Water

No clarifications or corrections are included.

4.4.8 Police, Fire, Parks, and Schools

Amend page 3.8-13 to update the status of the City's capital facilities plans and school impact fees:

Schools

To provide funds for relocating portable classrooms and constructing new permanent facilities, the City has adopted a school impact fee consistent with the CFP. As implemented in SMC Chapter 14.290, the impact fee is intended to mitigate a portion of the cost to the district of accommodating increased enrollment generated by new residential development. The district updates its CFP and requested impact fees on a biannual basis to reflect revised projections for capacity needs and costs. The City updates the impact fee rates in SMC Chapter 14.290 consistent with the updated CFP. As currently adopted in SMC Chapter 14.290, impact fees reflect the 2010–2015 CFP. As currently adopted in SMC Chapter 14.290, impact fees reflect the 2008–2013 CFP rather than the 2010–2015 CFP.

4.5 Appendices

No clarifications or corrections are included.

Chapter 5

Comments and Responses

Chapter 5 of this Final EIS contains public comments provided on the Draft Comprehensive Plan Amendments and Draft EIS during the 30-day comment period. This chapter also provides responses to those comments. Section 5.1 provides a list of public comments while Section 5.2 provides responses to comments followed by the letters.

The comment period for the Draft EIS extended from October 1 to November 1, 2010.

5.1 Public Comments

Two comment letters were received during the public comment process:

- A letter from DAHP dated November 1, 2010; and
- A letter from Snohomish County Public Works dated November 1, 2010.

Responses to comments are provided in Section 5.2.

5.2 Responses to Comments

Each of the comment letters described in Section 5.1 is provided a response in Section 5-2. Table 5-1 provides responses to comments. Distinct comments are numbered in the margins of the written comments corresponding to the numbered response in Table 5-1. A brief summary of the comment topic is contained in the heading preceding the response to comment in Table 5-1.

Comments that state an opinion or preference are acknowledged with a response that indicates the comment is noted and forwarded to the appropriate decision makers. Comments that ask questions, request clarifications or corrections, or are related to the Draft EIS are provided a response that explains the approach, offers corrections, or provides other appropriate replies.

Table 5-1. Responses to Comments

Comment Number/Topic	Response
Letter 1-DAHP	
DAHP-1 Professional archaeologist	In Table 1-1, under Section 3.5 Mitigation Measures, the term “qualified” archaeologist was replaced with “professional” archaeologist. The same correction was made in the Cultural Resources section.
DAHP-2 Permit from DAHP	In Table 1-1, under Section 3.5 Mitigation Measures, the text was revised to indicate that under RCW 27.53, a permit must be obtained from DAHP prior to impacting an archaeological resource/site. The same revision was made in the Cultural Resources section. See Final EIS Appendix F.
DAHP-3 Cultural resources mitigation section	In Table 1-1, under Section 3.5 Mitigation Measures, the text was revised to separate the discussion of the historic resources from archaeological resources. Protection for historic resources is usually found in local ordinances; while, state laws protect all precontact archaeological sites regardless of their significance or eligibility for local, state, or national registers. The same revisions were made in the Cultural Resources Mitigation Measures section in Draft EIS Section 3.5. See Final EIS Appendix F.
DAHP-4 Regulatory context	The description of DAHP’s regulatory authority was revised to clarify applicable state regulations. See Final EIS Appendix F.
DAHP-5 Regulatory context	The discussion of the regulatory context was edited to clarify applicable state regulations. See Final EIS Appendix F.
DAHP-6 Impacts section	In Draft EIS Section 3.5.2 Impacts, the text was revised to separate the discussion regarding impacts on the historic resources from impacts on archaeological resources. See Final EIS Appendix F.
DAHP-7 Historic versus archaeological resources	The cultural resources section (regulatory context, impacts, and mitigation measures) was revised to separate the discussion of historic resources from archaeological resources. See Final EIS Appendix F. Also see responses to DAHP comments 3, 4, and 6.
DAHP-8 Requirements if resources cannot be avoided	Potential mitigation measures (for historic and archaeological resources) were revised to emphasize what is required if resources cannot be avoided. See Final EIS Appendix F.
Letter 2: Snohomish County	
Sno.Co.-1 General support for the plan	Comment noted.
Sno.Co.-2 Applauds TDR program	Comment noted.
Sno.Co.-3 Non-motorized modes	Comment noted.

Comment Number/Topic	Response
Sno.Co.-4 Draft EIS Appendix D	The Final EIS Preferred Alternative provides more details about proposed Comprehensive Plan policy amendments, form-based height, setback, and other zoning standards, and design standards (Final EIS, Appendices A through C) intending to achieve the vision of a lively, walkable neighborhood of shops, personal and business services, offices, single-family homes, townhouses, and stacked flat apartments. The new development regulations would be applied to ensure compatibility and desired character. The regulations would implement the urban form promoted in Comprehensive Plan amendments for the Pilchuck District.
Sno.Co.-5 Commuter rail service	A new "Rail" section was added in the Transportation section of the Draft EIS at the end of the Affected Environment discussion. The new text mentions the possibility of future commuter rail service and a potential station location in the Pilchuck District.



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

November 1, 2010

Mr. Corbett Loch
Planning Director
City Of Snohomish
116 Union Avenue
Snohomish, WA 98290

In future correspondence please refer to:

Log: 071510-01-SN

Property: Pilchuck District Plan Draft EIS Comments

Re: Cultural Resources- Revisions required, EIS language and recommendations do not comply with state law

Dear Mr. Loch:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The above referenced project has been reviewed on behalf of the State Historic Preservation Officer. Some portions of the EIS incorrectly interpret state law regarding the protection of cultural resources. We request the following revisions:

- Pg. 1-12 – 1-13: The mitigation section, final paragraph, uses the term “qualified archaeologist.” The definition of “qualified” archaeologist was removed from state law in 2008. Please change this to “professional archaeologist.” Also, under RCW 27.53, a permit must be obtained from DAHP prior to impacting an archaeological resource/site. Please replace *“If the project would disturb an archaeological resource, the City will impose any and all measures to avoid or substantially lessen the impact. If avoidance of the archaeological resource is not possible, an appropriate research design must be developed and implemented with full data recovery of the archaeological resource prior to the development project.”* with “if the project will disturb an archaeological resource, the City will ensure that all appropriate permits are obtained to comply with state and federal laws and any required archaeological studies are completed before permitting any project that would disturb archaeological resource(s).”

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2

We further suggest that the built environment (buildings and structure) be separated from archaeological resources in this Mitigation section. Protection for historic buildings and structures is usually found in local ordinances while state law protects all precontact archaeological sites regardless of their significance or eligibility for local, state, or national registers.

3

Pg. 3.5-7 Regulatory Context: This section completely misinterprets state law. The statement that *“DAHP does not regulate the treatment of properties that are found to be significant; a local governing authority may choose to uphold the DAHP recommendation and may require mitigation of adverse effects on significant properties”* is incorrect. DAHP regulates the treatment of archaeological sites on both

4

public and private lands under RCW 27.53. Under RCW 27.53, all precontact resources are protected and eligibility for any historic register is not a criterion for protections. DAHP has the authority to **require** specific treatment of archaeological resources under RCW 27.53.

Under RCW 27.53, historic archaeological resources are not protected by law unless they are listed in or eligible for listing in the Washington Heritage Register (WHR) or the National Register of Historic Places (NRHP). DAHP administers the WHR. The NRHP is maintained by the National Park Service, US Department of Interior. Under the National Historic Preservation Act, 1966, it is the State Historic Preservation Officer's (SHPO's) responsibility to identify eligible properties for listing in the National Register. In the State of Washington, the SHPO resides at DAHP and while professional archaeological consultants may make recommendations for NRHP eligibility, it is DAHP's responsibility to make the determination of eligibility through concurrence with the consultant's recommendations.

The last paragraph beginning "for the purpose of the analysis" should be removed. The NRHP or WHR criterion have no bearing on protection of precontact archaeological resources and historic archaeological are protected unless a determination of "not-eligible" has been made by DAHP.

5

In Section 3.5.2, the discussion of historic buildings and structures should be separated for clarity.

6

In general, the discussion of archaeological resources, historic buildings, laws, and mitigation etc. is confusing and may pose potential difficulties for the City in dealing with these resources during future development. We recommend revising the cultural resources discussions throughout the draft EIS to clearly define whether resources being discussed are historic building and structures or archaeological resources and what ordinances or laws apply to each as well as what is required if resources cannot be avoided.

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8

Thank you for the opportunity to review. Please feel free to call or email me if you have any questions.

Sincerely,



Gretchen Kaehler
Assistant State Archaeologist
(360) 586-3088
gretchen.kaehler@dahp.wa.gov

CC. Mike Evans, Snohomish Tribe
Richard Young, Tulalip Tribe
Owen Dennison, Senior Planner, City of Snohomish

From: Corbitt Loch
Sent: Monday, November 01, 2010 1:09 PM
To: Brooke Eidem; Owen Dennison
Subject: FW: Comments on City of Snohomish Pilchuck District Subarea Plan DEIS

Importance: High
[Add to record and packet materials](#)

From: Soine, Candice [mailto:spwccs@co.snohomish.wa.us]
Sent: Monday, November 01, 2010 1:04 PM
To: Corbitt Loch
Cc: Stenstrom, Clarissa; Rucci, Melody; McCormick, Douglas; Zelinski, Michael; Soine, Candice; Fogard, Bobann
Subject: Comments on City of Snohomish Pilchuck District Subarea Plan DEIS
Importance: High

Corbitt Loch, Director
City of Snohomish, Planning & Development Services

Snohomish County Public Works has reviewed the submitted documents and has the following comments/observations:

- 1 ? Snohomish County supports the overall goals and objectives of this plan to create higher density and a better mix of uses within existing urban areas and to create more pedestrian and transit supportive development patterns. This is consistent with the county’s own efforts to increase urban land capacity to absorb growth and to reduce pressure on UGA boundaries.
- 2 ? The county applauds the city’s willingness to create a transfer of development rights (TDR) receiving area within its corporate limits. It is only through the designation of such sending areas that a market-based TDR program can successfully operate. The program’s goal of preservation of the county’s scarce agricultural land is a shared value for all our citizens – whether residing in a city or an unincorporated area.
- 3 ? This plan’s attention to non-motorized modes of transportation is also commendable, particularly in this neighborhood which is so close to the Centennial Trail. With the completion of this link of the trail - and the northern stretch between Arlington and the Skagit County - line by 2012, the Centennial Trail will be nearly unbroken for almost 30 miles at that time.
- 4 ? It is not clear how the guidance contained in Appendix D is to be implemented. If the design examples, public realm concept plan and street cross sections are merely advisory or aspirational, and are not reflected in specific city capital projects or in regulations applied to development proposals, it seems unlikely that the vision of the plan will actually be realized. A planned action EIS should be reasonably definitive about the mitigation that will happen, as opposed to mitigation that merely could happen.
- 5 ? Although the DEIS mentions the proposed trail along the former BNSF railroad alignment south of the study area to Woodinville, it fails to mention the commuter rail service that may also emerge along that corridor in the future. The most recent feasibility study on this subject – prepared in 2008 by Parsons/Brinckerhoff for the PSRC and Sound Transit – identifies 2 potential terminus station locations in Snohomish. One of these is in the center of the Pilchuck District around Lincoln and Pine, while the alternate location is south of the Snohomish River.

Although the prospects for commuter rail between Snohomish and Woodinville appear to extend fairly far into the future, the DEIS should at least acknowledge the possibility of commuter rail service to this area some day.

Thank you for the opportunity to review and comment. If you have any questions or comments please contact me and they will be referred to the appropriate reviewer.

Candice Soine, Environmental Review Coordinator for

Clarissa Stenstrom | Supervisor
Environmental Services Section (ENVS)

Snohomish County
Department of Public Works
Transportation & Environmental Services
(425) 388-3488 x2148
(425) 388-6674 Fax



Please consider the environment before printing this email

The following agencies and organizations have been provided with a notice of availability. Those marked with an asterisk (*) have received a compact disc or a hard copy of the EIS.

6.1 Federal Agencies

Bonneville Power Administration
914 Avenue D
Snohomish, WA 98290

Federal Emergency Management Agency
130 228th Street SW
Bothell, WA 98021-8627

Department of the Interior
U.S. Fish and Wildlife Service
510 Desmond Drive Southeast
Lacey, WA 98503-1263

National Oceanic and Atmospheric Administration, Northwest Regional Office
National Marine Fisheries Service
7600 Sand Point Way NE
Seattle, WA 98115-0070

U.S. Army Corps of Engineers, Seattle District
PO Box 3755
Seattle, WA 98124

U.S. Department of Agriculture and National Conservation and Recreation Service
Washington Northwest Office
528 91st Avenue NE, Suite C
Lake Stevens, WA 98253

U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, WA 98101

U.S. Post Office
1323 Avenue D
Snohomish, WA 98290

6.2 Indian Tribes, State and Regional Agencies

Puget Sound Clean Air Agency
1904 Third Avenue, Suite 105
Seattle, WA 98191

Puget Sound Partnership
PO Box 40900
Olympia, WA 98504-0900

Puget Sound Regional Council*
1011 Western Avenue, Suite 500
Seattle, WA 98104

Tulalip Tribes*
Environmental Division
6700 Totem Beach Road
Marysville, WA 98271

Washington State Department of Agriculture
SEPA Unit
1111 Washington Street SE
Olympia, WA 98504-2560

Washington State Department of Archaeology and Historic Preservation*
1063 South Capitol Way, Suite 106
Olympia, WA 98501

Washington State Department of Commerce*
Local Government Division
128 10th Avenue SW
PO Box 42525
Olympia, WA 98504-2525

Washington State Department of Ecology*
Shawn McKone
3190 160th Avenue SE
Bellevue, WA 98008

Washington Department of Ecology*
David Pater, Shoreline Specialist
3190 160th Avenue SE
Bellevue, WA 98008

Washington State Department of Ecology*
SEPA Unit
PO Box 47703
Olympia, WA 98504-7703

Washington State Department of Fish and Wildlife
Region 4

Jamie Bails
16018 Mill Creek Boulevard
Mill Creek, WA 98012-1296

Washington State Department of Fish and Wildlife
Region 4
David Brock
16018 Mill Creek Boulevard
Mill Creek, WA 98012-1296

Washington State Department of Natural Resources*
SEPA Center
1111 Washington Street
PO Box 47015
Olympia, WA 98504-7015

Washington State Department of Natural Resources
Steven Huang
919 North Township Street
Sedro-Woolley, WA 98284-9394

Washington State Department of Social and Health Services
Elizabeth McNagny
PO Box 45848
Olympia, WA 98504-5848

Washington State Department of Transportation
George Chambers
PO Box 330310
Seattle, WA 98133-9710

Washington State Department of Transportation*
Environmental Services Management
PO Box 47331
Olympia, WA

6.3 Cities, Counties, and Neighboring Planning Departments

City of Everett*
Allan Giffen, Planning Director
2930 Wetmore Avenue, Suite 8A
Everett, WA 98201

City of Lake Stevens
Becky Ableman, Planning Director
1812 Main Street
Lake Stevens, WA 98258

City of Monroe
Planning Director
806 West Main Street
Monroe, WA 98272

Puget Sound Energy
Elaine Babby, Municipal Liaison Manager
PO Box 90868
Bellevue, WA 98009-0868

Snohomish County Planning and Development Services*
3000 Rockefeller
Everett, WA 98201

Snohomish County Public Works*
Candice Soine
3000 Rockefeller
M/S 607
Everett, WA 98201

6.4 Public Services, Transportation, and Utilities

Comcast Corporation
Casey Brown, Engineering Coordinator
1525 75th Street SW, Suite 200
Everett, WA 98203

Community Transit*
Brent Russell, Service Planner
7100 Hardeson Road
Everett, WA 98290

Cross Valley Water District
8802 180th Street SE
Snohomish, WA 98296-4804

French Slough Flood Control District
Neil Wheeler, District Manager
8222 Riverview Road
Snohomish, WA 98290

Harvey Field
9900 Airport Way
Snohomish, WA 98296

Lake Stevens Sewer District
1106 Vernon Road, Suite A
Lake Stevens, WA 98258

Marshland Flood Control District
Paul Reasoner, Manager
PO Box 85
Snohomish, WA 98291

Public Utility District #1
Mary Bond
PO Box 1107
Everett, WA 98206

Snohomish Conservation District
528 91st Avenue NE Suite A
Lake Stevens, WA 98258

Snohomish County Fire District #4*
PO Box 820
Snohomish, WA 98290

Snohomish County Fire District #8
9811 Chapel Hill Road
Lake Stevens, WA 98258

Snohomish Library*
Rebecca Loney
311 Maple Avenue
Snohomish, WA 98290

Snohomish School District #201*
Administrative Offices
1601 Avenue D
Snohomish, WA 98290

Verizon Northwest
Karen Brown
PO Box 1003
Everett, WA 98206-1003

6.5 Interest Groups, Individuals, and Companies

Cascade Land Conservancy*
Skip Swenson, TDR Program Director
615 Second Avenue, Suite 600
Seattle, WA 98104

People for Puget Sound
Dave Peeler
120 East Union Avenue, Suite 204
Olympia, WA 98501

Pilchuck Audubon Society
1429 Avenue D
Snohomish WA 98290

Puget Soundkeeper Alliance
Chris Wilke
5305 Shilshole Avenue NW, Suite 150
Seattle, WA 98107

South Snohomish County
Chamber of Commerce
3815 196th Street SW, Suite 136
Lynnwood, WA 98036

Snohomish Historical Society*
118 Avenue B
Snohomish, WA 98290

6.6 City Officials, Commissions, and Departments

City Clerk*

City Council*

City Manager*

Planning and Development Services*

Planning Commission*

Public Safety*

Public Works*