

**SNOHOMISH COUNTY  
NOTICE OF ISSUANCE AND AVAILABILITY**

**FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT  
PROPOSED FINAL DOCKET XIII AMENDMENT: PARAMOUNT of WASHINGTON LLC (SW 41)**

Notice is hereby given that Snohomish County has issued the Snohomish County 2009 Final Docket XIII – Paramount of Washington LLC (SW 41) Final Supplemental Environmental Impact Statement (SEIS) analyzing proposed amendments to the Snohomish County GMA Comprehensive Plan (GMACP).

**DESCRIPTION OF PROPOSAL:** The Final SEIS Proposed Action considers the site-specific request to amend the GPP Future Land Use Map and associated implementing rezones for the Paramount of Washington LLC (SW 41) proposal.

**PROPONENT:** Snohomish County

**LOCATION OF PROPOSAL:** The proposed Final Docket XIII – Paramount of Washington LLC (SW 41) and the associated Final SEIS address the corresponding property located in unincorporated Snohomish County.

**LEAD AGENCY:** Snohomish County, Department of Planning and Development Services

**FINAL SEIS CONTENTS:** This Final SEIS contains a summary of the Proposed Action and the No Action Alternative, significant impacts, mitigation measures, and significant unavoidable adverse impacts. This Final SEIS also contains responses to the written comments on the Draft SEIS submitted to the County during the comment period.

**DOCUMENT AVAILABILITY:** Copies of the Final Docket XIII Amendments and the Draft SEISs are available for review at the Snohomish County Department of Planning and Development Services and at the County's website, [www.snoco.org](http://www.snoco.org) or you can contact:

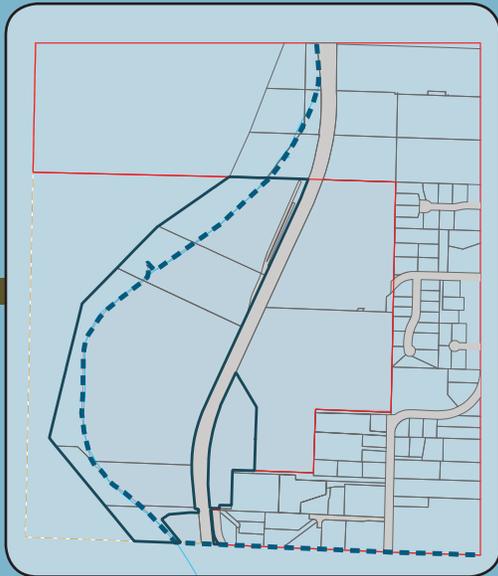
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**FINAL SEIS ISSUANCE DATE:** June 12, 2009

**FINAL SEIS CIRCULATION:** This FSEIS is being sent to all recipients of the previously issued Draft SEIS and to anyone who commented on the Draft SEIS.

**RESPONSIBLE OFFICIAL:**

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**FINAL**  
Supplemental Environmental Impact Statement

Final Docket XIII Comprehensive Plan Amendment - Paramount of  
Washington LLC ■ Snohomish County ■ June 2009



Final Supplemental Environmental Impact Statement  
Final Docket XIII Amendments to the GMA Comprehensive Plan  
Paramount of Washington LLC

Prepared for:



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June 2009

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## Acronyms

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BAT	business access and transit
BMPs	best management practices
BNSF	Burlington Northern Santa Fe
County	Snohomish County
CPPs	Countywide Planning Policies
dBA	A-weighted decibels
Draft SEIS	Draft Supplemental Environmental Impact Statement
Ecology	Washington State Department of Ecology
EMTs	emergency medical technicians
FAZs	Forecast Analysis Zones
FCC	Fully Contained Community
FD1	Fire District 1
Final SEIS	Final Supplemental Environmental Impact Statement
FLUM	Future Land Use Map
GMA	Growth Management Act
gpcd	gallons per capita per day
GPP	General Policy Plan
HI	Heavy Industrial
HSS	Highway of Statewide Significance
ITE	Institute of Transportation Engineers
LOS	level of service

MARSEC	Maritime Security
mgd	million gallons per day
MOU	Memorandum of Understanding
MUGA	Municipal Urban Growth Area
NDPES	National Pollutant Discharge Elimination System
PCB	Planned Community Business
PDR	Purchase of Development Rights
PSRC	Puget Sound Regional Council
RCS	Rural Cluster Subdivisions
RWD	Ronald Wastewater District
SCC	Snohomish County Code
SEIS	Supplemental Environmental Impact Statement
SEPA	State Environmental Policy Act
Shoreline	City of Shoreline
SMMP	Shoreline Management Master Program
SR	State Route
ST2	Sound Transit 2
UC	Urban Center
UGA	Urban Growth Area
UI	Urban Industrial
Woodway	Town of Woodway
WSDOT	Washington State Department of Transportation



# Fact Sheet

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<b>Proposed Action:</b>	<b>Snohomish County Growth Management Act Comprehensive Plan Draft Supplemental Environmental Impact Statement for Docket XIII – Paramount of Washington LLC Proposal</b>  Annual amendments to the Snohomish County Growth Management Act (GMA) Comprehensive Plan are proposed in accordance with the provisions of the GMA and Snohomish County Code Title 30.74. This Final Supplemental Environmental Impact Statement (SEIS) prepared for one of the Docket XIII amendments to the Snohomish County GMA Comprehensive Plan provides programmatic environmental review of one proposed site-specific nonproject amendment to the Future Land Use Map (FLUM) designation and associated rezone. In 2005, Snohomish County completed environmental review of the 10-Year Update to the Snohomish County GMA Comprehensive Plan. This document supplements the EIS prepared for the 10-Year Update.
<b>Action Sponsor:</b>	Snohomish County
<b>Lead Agency Responsible Official:</b>	Craig R. Ladiser, Director Snohomish County Planning & Development Services M/S #604 3000 Rockefeller Avenue Everett, WA 98201-4201
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<b>Approvals Required:</b>	Snohomish County Planning Commission – Recommendation Snohomish County Council -- Adoption
<b>Date of Final SEIS Issuance:</b>	June 12, 2009
<b>Timing of Subsequent SEPA Review:</b>	Project-level State Environmental Policy Act (SEPA) review will be conducted as appropriate project-level applications are submitted.
<b>Location of Background and Supporting Documents:</b>	Planning & Development Services Snohomish County 3000 Rockefeller Avenue Everett, WA 98201-4201
<b>Document Availability:</b>	This Final SEIS and the Draft SEIS for the Snohomish County GMA Comprehensive Plan are available on line at: <a href="http://www.snoco.org">http://www.snoco.org</a> . In the search box type in the words "Docket XIII Paramount of Washington, LLC Final SEIS."  Hard copies or CDs of the Final SEIS are available by contacting Planning and Development Services at 425-388-3670. A charge to cover costs of reproduction may be required.
<b>Authors and Principal Contributors:</b>	This Final SEIS for the Snohomish County GMA Comprehensive Plan Docket XIII Amendment for the Paramount of Washington, LLC site-specific request was prepared under the direction of the Snohomish County Planning and Development Services

Department. Research, analysis and document preparation were performed by the following departments and firms:

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# Chapter 1. Summary

## 1.1. Introduction

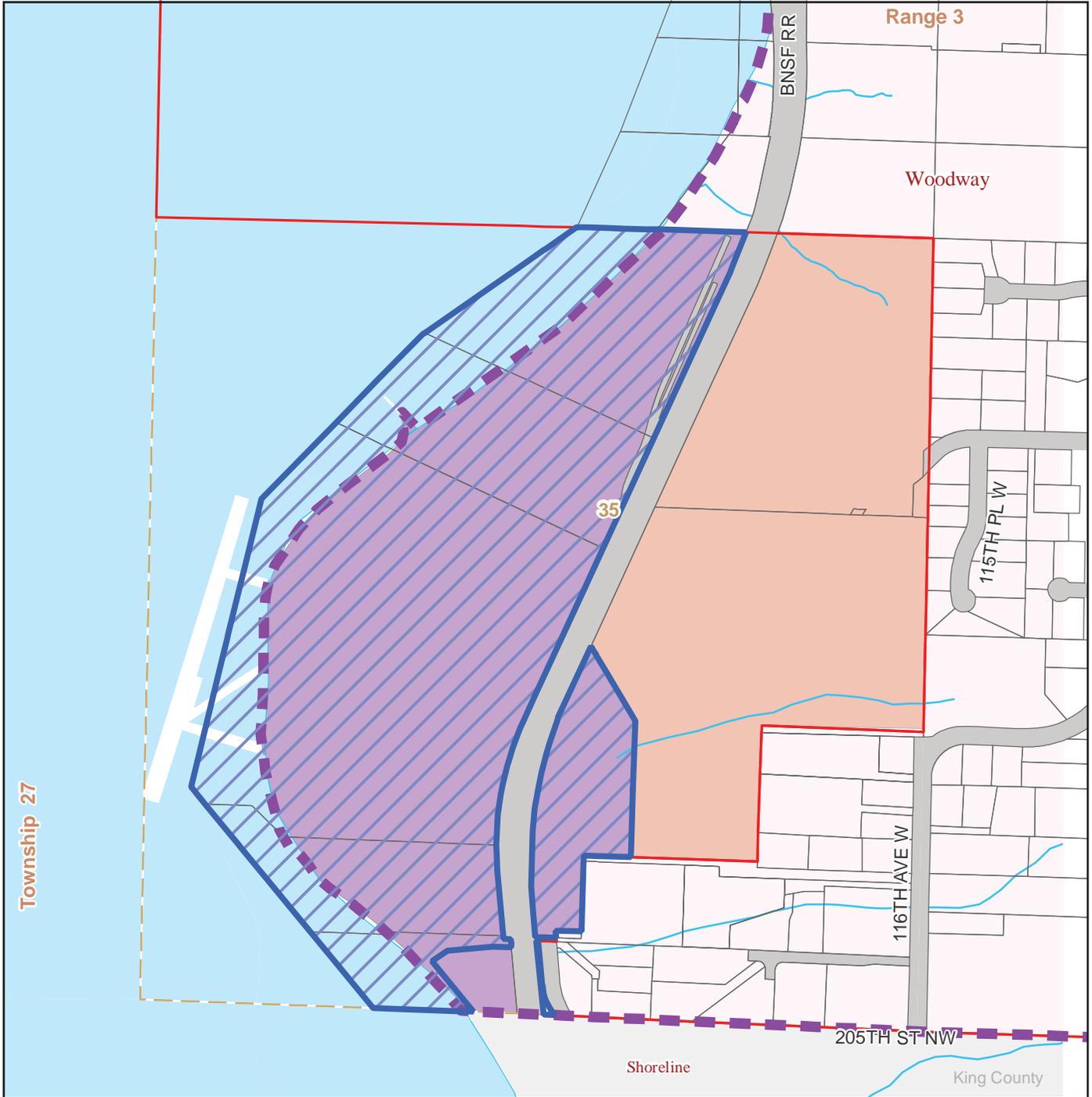
This chapter summarizes information contained in this Final Supplemental Environmental Impact Statement (Final SEIS) prepared for Snohomish County’s Docket XIII Paramount of Washington LLC’s site-specific nonproject amendment to the Growth Management Act (GMA) Comprehensive Plan’s Future Land Use Map (FLUM) and associated rezone. The SEIS supplements the EIS issued in 2005 for the 10-Year Update of the County’s GMA Comprehensive Plan. This Final SEIS contains a summary of the Proposed Action and the No Action Alternative, significant impacts, mitigation measures, and significant unavoidable adverse impacts. This summary is intentionally brief; the reader should consult individual sections of the Draft Supplemental Environmental Impact Statement (Draft SEIS) issued on February 6, 2009, for detailed information concerning the affected environment, impacts, and mitigation measures. Text that has been deleted from the Draft SEIS is shown in ~~strikeout~~ mode. Text that has been inserted into the Draft SEIS is shown in underline format.

## 1.2. Proposed Action

The Proposed Action consists of the Paramount of Washington LLC proposal (Figure 1-1):

**Table 1-1. Proposed Action and Scope of Environmental Review**

Docket Proposal	Location	Proposed Action	Scope of Environmental Review in SEIS
Paramount of Washington LLC (SW 41)	Southwest border of the County abutting Woodway and Shoreline; at northwest terminus of Richmond Beach Drive	Redesignate from Urban Industrial (UI) to Urban Center (UC) <u>and rezone from Heavy Industrial (HI) to Planned Community Business (PCB)</u>	Earth and Soil and Groundwater Contamination; Surface Water, Water Quality, and Drainage; Wetlands; Fisheries; Wildlife and Vegetation; Air Quality; Noise; Cultural Resources; Aesthetics; Population, Employment, and Housing; Transportation; Public Services (Police, Fire and Emergency Medical Services; Parks; Schools; Water Systems; Sanitary Sewer Systems; Telecommunications; Solid Waste; Power and Natural Gas); Land and Shoreline Use Patterns; Relationship to Plans and Policies.



Proposed Plan Amendment:



Paramount of Washington  
LLC (SW41)

Redesignate  
Urban Industrial to  
Urban Center.

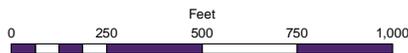
Existing Plan Designations

- Urban Low Density Residential
- Urban Medium Density Residential
- Urban Industrial

- UGA Boundary
- Cities
- Assessor Parcels
- Section Grid

Produced by Snohomish County Department of Planning and Development Services, Cartography/GIS Team. Snohomish County disclaims any warranty of merchantability or warranty of fitness of this map for any particular purpose, either expressed or implied. No representation or warranty made concerning the accuracy, currency, completeness or quality of data depicted on this map. Any user of this map assumes all responsibility for use thereof, and further agrees to hold Snohomish County harmless from and against any damage, loss, or liability arising from any use of this map.

Map Document: (W:\plng\carto\doctet\Docket\_XIII\Preliminary\_Maps\Individual\Infill\SW\_Infill\SW41\_ParamountofWashingtonLLC\_FLU.mxd) 2/11/2008



Source: Snohomish County 2008

1068.07/SEIS (11/08)

### 1.3. No Action Alternative

The No Action alternative assumes that the docket proposal is not adopted and the existing FLUM and zoning designation continue as allowed under existing County plans, policies, and regulations.

### 1.4. Summary of Impacts and Mitigation Measures

Table 1-2 provides a summary of the environmental impacts for each element of the environment evaluated in Chapter 3 of the Draft SEIS. For a complete discussion of the elements of the environment considered, please refer to the Draft SEIS Chapter 3.

**Table 1-2. Summary of Potential Impacts of the Proposed Action and No Action Alternative**

	Proposed Action	No Action Alternative
<b>Paramount of Washington LLC</b>		
Future Land Use Map (FLUM) Designation	Urban Center (UC)	Urban Industrial (UI)
<u>Zoning</u>	<u>Planned Community Business (PCB)</u>	<u>Heavy Industrial (HI)</u>
<b>Earth</b>		
Impacts	<p><del>Earth and Critical Areas: No impacts are anticipated as a direct result of the Proposed Action.</del></p> <p><b>Soil and Groundwater Contamination:</b> Shallow groundwater affected by volatile petroleum hydrocarbons presents the potential for contaminated soil vapors. Soil vapors with elevated levels of contamination could adversely affect the public by intruding into structures.</p>	<p><b>Earth and Critical Areas:</b> If industrial activity includes the construction of additional structures, project-specific geotechnical and geologic analyses would be required to evaluate the impact of seismic, erosion, and settlement hazards.</p> <p><b>Soil and Groundwater Contamination:</b> Under current U.S. Coast Guard Maritime Security (MARSEC) requirements, the site is secured, which prevents the public from exposure to on-site contamination. Under the No Action Alternative, Paramount would continue with the current remediation program being conducted under Ecology's Outfall 2 National Pollutant Discharge Elimination System (NPDES) permit. Should the Proposed Action be approved and development permitted, Paramount would cease the current petroleum operations. The site would be decommissioned and remediation activities would be accelerated (Huff per. comm. 2008).</p>
Mitigation Measures	<p><b>Soil and Groundwater Contamination:</b></p> <ul style="list-style-type: none"> <li>▪ Continue to implement the existing soil sampling program to identify and characterize the extent of soil contamination on the site.</li> <li>▪ Develop a plan to remediate contamination identified by the soil sampling program. Depending on conditions encountered at the site, remediation methods such as excavation, segregation, and/or capping of affected soils may be necessary.</li> </ul>	

	<b>Proposed Action</b>	<b>No Action Alternative</b>
	<ul style="list-style-type: none"> <li>▪ Evaluate the potential for soil vapor intrusion associated with volatile contaminants such as benzene. The Washington State Department of Ecology (Ecology) would require cleanup of the site or the implementation of soil vapor engineering controls before residential or commercial development could occur, or as part of building design and construction.</li> <li>▪ Assess the need for an off-gassing or a subsurface vapor collection system.</li> <li>▪ Continue operating the existing groundwater extraction and treatment system.</li> <li>▪ Evaluate technologies to increase cleanup efficiencies.</li> <li>▪ <u>Institute controls to prevent future use of site groundwater for drinking water or irrigation purposes.</u></li> </ul>	
Unavoidable Adverse Impacts	<p><del>Earth and Critical Areas: No impacts anticipated.</del></p> <ul style="list-style-type: none"> <li>▪ <u>Soil and Groundwater Contamination: There are no impacts under the Proposed Action. Under both the Proposed Action and the No Action Alternative, Ecology would require that the soil and groundwater remediation and characterization activities continue.</u></li> <li>▪ <del>Significant potential for soil vapor emanating from subsurface contamination to concentrate over time thereby creating 'pockets' of trapped vapor contamination.</del></li> <li>▪ <del>Institutional Controls will likely be required to prevent future use of site groundwater for drinking water or irrigation purposes.</del></li> </ul>	
<b>Surface Water</b>		
Impacts	<p>Future development could increase the amount of impervious surface on the site, increasing stormwater runoff.</p> <p>Currently, more than half the site is impervious area. Required treatment standards that would be applied to future development are more efficient at pollutant removal than existing BMP's at the site.</p> <p>Future development in the portion of the site that is in a special flood hazard area would require flood-proofing of all new construction.</p> <p>It is likely that mitigation measures associated with development of the Proposed Action would lead to an overall improvement of surface water quality runoff from the site compared to existing conditions.</p>	<p>The current petroleum-based operations would continue and could increase to the operation's capacity. The southern site area could be developed with additional Urban Industrial uses. Only runoff from newly developed impervious surfaces would receive stormwater treatment.</p>
Mitigation Measures	<ul style="list-style-type: none"> <li>▪ Encourage the use of drainage systems that mimic natural drainage systems, such as vegetated swales, wet ponds, and created wetlands.</li> <li>▪ Adopt more protective water quality standards, such as more protective requirements for water quality best management practices (BMPs).</li> <li>▪ Reduce impervious surface area by adopting new development requirements that set maximum limits on the percentage of impervious area allowed and increase the infiltration of surface water (low impact development regulations).</li> <li>▪ Implement stormwater quality monitoring to evaluate the effectiveness of stormwater practices and standards.</li> <li>▪ Improvements to the constructed ditch along the north and eastern boundaries of the site to create a channel that mimics a natural creek.</li> <li>▪ Removing the culvert that conveys the unnamed creek in the southern portion of the site, and restoring the natural channel through the site for that creek.</li> </ul>	
Unavoidable Adverse Impacts	<p><del>There would be no significant unavoidable adverse impacts on surface water related to the Proposed Action. None.</del></p>	

	Proposed Action	No Action Alternative
<b>Wetlands</b>		
Impacts	<p>Development within a wetland or buffer would result in the direct filling and subsequent loss of the resource.</p> <p>Development outside of wetlands and buffers could result in some indirect impacts on wetlands including sedimentation from stormwater runoff, increased nutrient loading from road and lawn runoff, changes in the amount or time water is in the wetland, and associated changes to wetland vegetation and habitat. Higher density development would also increase the probability of nonnative plant species invading wetland and buffer vegetation communities.</p>	<p>The effect of an increase in current operations on the site could result in an increase in impervious surfaces possibly leading to additional impact on the existing wetlands such as increased sedimentation from stormwater runoff, increased nutrient loading from road runoff, or changes in the amount or time water is in the wetland. Development in a wetland or buffer would result in the direct filling and subsequent loss of the resource.</p> <p>Under the No Action Alternative, the site may be used for petroleum product refining and distribution. In the past, refinery operation on the site has refined up to 5,000 barrels of petroleum per day. If this were to occur, it is likely that train traffic to the site would also increase.</p>
Mitigation Measures	<ul style="list-style-type: none"> <li>▪ Minimize impervious surface area.</li> <li>▪ Schedule construction activities to occur during the dry season to reduce impacts on soils near wetlands and streams.</li> <li>▪ Encourage increased infiltration of stormwater where technically feasible.</li> <li>▪ Encourage buffer enhancement.</li> <li>▪ Where protected stream and wetland buffers are in a degraded condition, encourage enhancement of the buffer through means such as establishment of native vegetation and control of nonnative invasive plant species.</li> </ul>	
Unavoidable Adverse Impacts	<p>If potential impacts on wetlands or buffers from future development of the site are avoided or mitigated, then no unavoidable adverse impacts are anticipated for this site. If wetland or buffer areas cannot be avoided or mitigated, then any future development would likely result in significant unavoidable adverse wetland impacts.</p>	
<b>Fisheries</b>		
Impacts	<p>The site is fully developed, and therefore currently has little or no functioning shoreline buffer along the majority of the shoreline. Maintaining the existing buffer in the current condition would not benefit the Puget Sound tidelands and marine habitat on and adjacent to the site.</p>	<p>Although state and federal regulations would continue to apply to industrial activities at the site, reducing the potential for spills, there would be a greater potential for fuel spills than under the Proposed Action.</p>
Mitigation Measures	<p>No mitigation measures for fisheries impacts would be required.</p>	
Unavoidable Adverse Impacts	<p><del>There are no significant unavoidable adverse impacts.</del> <u>None.</u></p>	
<b>Wildlife and Vegetation</b>		
Impacts	<p><b>Wildlife:</b> If redevelopment to mixed use occurs, the increased level of human activity could reduce the potential for wildlife usage of the site, as wildlife may be disturbed by the human presence.</p> <p><del>Following redevelopment, noise levels on the site may be lower due to decreased industrial activity and train traffic to the site and increased vegetative cover that would</del></p>	<p><b>Wildlife:</b> The beach would remain restricted from public use and, therefore, human disturbance to wildlife would be less than what could occur under the Proposed Action. The site would continue to lack significant vegetation and so would lack habitat for most wildlife species.</p> <p><b>Vegetation:</b> Beach access would remain restricted so the potential for impacts on</p>

	Proposed Action	No Action Alternative
	<p><del>provide some noise attenuation.</del></p> <p><del>Increased human activity along the shoreline may discourage use by bald eagles.</del></p> <p><del>If wetland buffers or shoreline setbacks are restored using native plant species, additional wildlife habitat would be created on site.</del></p> <p><del>Redevelopment could benefit critical habitat for southern resident killer whales by restoring a shoreline buffer, thereby incrementally improving water quality in the area.</del></p> <p><b>Vegetation:</b> If the site were redeveloped for mixed use, it is expected that the tidal area would be accessible to more people and potentially impact marine vegetation.</p>	<p>marine vegetation would remain similar to current conditions.</p>
Mitigation Measures	<ul style="list-style-type: none"> <li>▪ <b>Wildlife:</b> No mitigation measures for wildlife impacts would be required.</li> <li>▪ <b>Vegetation:</b> No mitigation measures for vegetation impacts would be required.</li> </ul>	
Unavoidable Adverse Impacts	<p><del><b>Wildlife:</b> There are no significant unavoidable adverse impacts. Under the Proposed Action, the level of human activity in the tidal area could be expected to increase, which could reduce the potential for wildlife usage of the site, as wildlife may be disturbed by the presence of humans.</del></p> <p><del><b>Vegetation:</b> There are no significant unavoidable adverse impacts. Under the Proposed Action, it is expected that the shoreline/tidal area would be accessible to people for the purposes of beachcombing and clam digging, which could potentially impact marine vegetation.</del></p>	
<b>Air Quality</b>		
Impacts	<p><del><b>Elimination of Current Industrial Emissions:</b> Current industrial operations at the site would cease, therefore eliminating the considerable industrial emissions generated by those operations.</del></p> <p><b>Construction Emissions:</b> Compliance with PSCAA regulations would prevent construction-related impacts on homes and businesses near the future construction sites.</p> <p><b>Local "Hot Spot" Air Quality Impacts from Increased Traffic at Local Intersections:</b> It is unlikely that air quality impacts at local intersections would be significant.</p> <p><del><b>Emissions from Proposed New Commercial Operations:</b> It is unlikely that new commercial operations would cause significant air quality issues, particularly when compared to the existing industrial operations they would replace.</del></p> <p><del><b>Emissions from Potential Sound Transit Commuter Rail Station:</b> Implementation of current EPA emission control regulations for locomotives is expected to gradually reduce emission rates and</del></p>	<p>Operations at the existing fuel terminal and asphalt plant at the site could be expected to expand. Air pollutant emissions would continue to be generated by the industrial operations.</p> <p>Emissions from the industrial operations sources would increase if current petroleum operations increase, or if rail traffic along the BNSF rail line increases. Train traffic on the BNSF rail line is forecast to increase its current volume of train crossings per day. The No Action Alternative would include restarting the petroleum refining operations at the 5,000 barrel per day capacity. This would generate additional marine terminal visits and haul truck traffic, with corresponding air emission increases.</p>

	Proposed Action	No Action Alternative
	<p>ambient impacts.</p> <p><b>Greenhouse Gas Emissions:</b> The Proposed Action could reduce regional greenhouse gas (GHG) emissions by roughly 8,883 metric tons CO2 equivalent per year compared to business as usual. The GHG emission reductions would beneficially contribute to the state's goal of reducing statewide GHG emissions to 50% below 1990 levels by 2050. The 8,883 metric tons per year reduction in the study area (compared to future business as usual) would be a relatively small fraction of the statewide reduction goal. Regardless, the reductions would incrementally assist in achieving the statewide goal.</p>	
Mitigation Measures	<p>No mitigation measures for air quality impacts would be required.</p> <p>The County should require all construction contractors to implement air quality control plans for construction activities in the study area as part of plan features of the Proposed Alternative. Supplemental Construction Emission Reduction Measures include:</p> <ul style="list-style-type: none"> <li>▪ Use water sprays or other non-toxic dust control methods on unpaved roadways.</li> <li>▪ Minimize vehicle speed while traveling on unpaved surfaces.</li> <li>▪ Prevent track-out of mud onto public streets.</li> <li>▪ Cover soil piles when practical.</li> <li>▪ Minimize work during periods of high winds when practical.</li> </ul> <p>Measures to minimize air quality and odor issues caused by tailpipe emissions include:</p> <ul style="list-style-type: none"> <li>▪ Locate stationary engines as far as practical from sensitive receptors.</li> <li>▪ Maintain the engines of construction equipment according to manufacturers' specifications.</li> <li>▪ Minimize idling of equipment while the equipment is not in use.</li> </ul> <p>Washington State Department of Ecology (Ecology) will likely implement GHG reduction requirements for new developments. Although the exact measures that will be required by Ecology cannot be forecast at this time, GHG emission reductions could be provided by using prudent building design and construction methods to use recycled construction materials, reduce space heating and electricity usage, and reduce water consumption and waste generation.</p>	
Unavoidable Adverse Impacts	<p>Neither the Proposed Action nor the No Action Alternative would cause significant air quality impacts. <u>None.</u></p>	
<b>Noise</b>		
Impacts	<p><b>Construction Noise:</b> Affected residences could include existing homes on the hillside overlooking the site, or future new dwellings on the site close to other Paramount buildings under construction. Daytime construction activity could cause annoyance and speech interference at outdoor locations adjacent to the construction sites, and could cause discernible noise for several blocks away from the site. Compliance with County nighttime noise ordinance limits would</p>	<p>Under the No Action Alternative, noise emissions would increase if current petroleum operations increase, or if rail traffic along the BNSF rail line increases. Train traffic on the BNSF rail line is forecast to increase from its current volume of 40 train crossings per day up to 75 per day. Current industrial operations on site are equipped to refine up to 5,000 barrels per day of petroleum, although those refining operations are currently dormant. The No Action Alternative would include</p>

	<b>Proposed Action</b>	<b>No Action Alternative</b>
	<p>ensure nighttime construction activity would not cause significant impacts.</p> <p><b>Noise from Increased Traffic on Local Streets:</b> All of the forecast traffic noise increases along each representative roadway segment are lower than Washington State Department of Transportation's (WSDOT's) "substantial increase" criterion of 10 A-weighted decibels (dBA). Therefore, this impact is not expected to be significant.</p> <p><b>Noise from New Commercial Operations in Redeveloped Paramount Parcel:</b> Depending on the nature of the proposed development, the County may require the developer to conduct a noise impact study to forecast future noise levels, and to specify appropriate noise control measures. Compliance with the noise ordinance would ensure this potential impact would not be significant.</p> <p><b>Noise from Potential Sound Transit Commuter Rail Station:</b> Future noise levels generated by low speed operations at the commuter station would likely be lower than the current noise levels generated by high speed commuter trains traveling past the site. Therefore, operation of a new commuter train station could reduce overall train noise levels on the site compared to the No Action Alternative, so this impact would not be significant.</p>	<p>restarting the petroleum refining operations at the 5,000 barrel per day capacity. This would generate additional marine terminal visits and haul truck traffic, with corresponding noise emission increases.</p>
Mitigation Measures	<p><del>No mitigation measures for noise impacts would be required.</del></p> <p>County could require all future construction contractors within the proposed developments abide by supplemental construction noise reduction measures, including:</p> <ul style="list-style-type: none"> <li>▪ Construction at night or on weekends could be prohibited, unless special dispensation was obtained from the County.</li> <li>▪ Use of impact equipment should be discouraged before 8:00 a.m. and after 6:00 p.m.</li> <li>▪ Loud, stationary equipment should be located as far as practical from noise-sensitive receivers.</li> <li>▪ Idling trucks should be parked as far as practical from noise-sensitive receivers, and shut off when not active for long periods of time.</li> <li>▪ Contractors should be discouraged from dropping pallets onto the ground, or from dragging steel items across pavement.</li> <li>▪ Contractors should be required to give their employees "noise awareness training" to be aware of noise concerns at nearby homes and businesses.</li> </ul>	
Unavoidable Adverse Impacts	<p><del>Neither the Proposed Action nor the No Action Alternative would cause significant noise impacts. <u>None.</u></del></p>	
<b>Cultural Resources</b>		
Impacts	<p>There are currently no cultural resources known to exist in or on the site, and therefore development activities under the Proposed Action would result in no</p>	<p>There are currently no cultural resources known to exist in or on the site, and therefore development activities under the No Action Alternative would result in no</p>

	Proposed Action	No Action Alternative
	impacts on cultural resources.	impacts on cultural resources.
Mitigation Measures	<ul style="list-style-type: none"> <li>An archaeological survey and testing is recommended for projects that involve significant excavation or changes vegetation and landforms.</li> <li>In the event that future development is proposed, it is recommended that an environmental review be conducted. If the project would disturb an archaeological resource, it is recommended that the County 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.</li> </ul>	
Unavoidable Adverse Impacts	<del>No significant unavoidable adverse impacts are anticipated. None.</del>	
<b>Aesthetics</b>		
Impacts	<p><b>Visual Character:</b> No significant adverse impacts are anticipated.</p> <p><b>Height and Bulk:</b> Proposed Action has the potential to generate an increase in height and bulk over the No Action Alternative. Project-level review would be required to determine the exact height and bulk impacts.</p> <p><b>Light and Glare:</b> The commercial component of the Proposed Action has the potential to significantly increase the amount of generated light and glare.</p> <p><b>Views:</b> The exact extent of view impacts cannot be analyzed as no architectural plans or design specifications have been submitted. Project-level design review by the County would be required to determine the exact view impacts.</p>	<p><b>Visual Character:</b> The development would already be allowed under the current land use designation and zoning regulations, yet it would represent an increase over existing conditions and has the potential to create impacts on visual character.</p> <p><b>Height and Bulk:</b> No Action Alternative would entail an expansion of industrial uses to cover a greater portion of the site, thus increasing overall height and bulk.</p> <p><b>Light and Glare:</b> The No Action Alternative has the potential to increase ambient light and glare in the vicinity.</p> <p><b>Views:</b> Additional construction of industrial facilities on the southern portion of the lowland area could potentially further disrupt views from the site. Off-site views of Puget Sound could potentially be affected. Expansion of development onto the currently open southern portion of the lowland area could potentially disrupt views from existing development located south of the Paramount site.</p>
Mitigation Measures	<ul style="list-style-type: none"> <li>Regulations specify that exterior illumination and lighted signs shall be hooded and/or shielded to prevent glare.</li> <li>Signs in the Planned Community Business (PCB) zone shall not employ animations, sounds, rotation or illumination by any flashing type of light.</li> <li>Future development may require mitigation measures to address potential impacts on the built environment, particularly with regard to height, bulk, and views. Future impacts would be analyzed and applied under the County's SEPA review process at the time of application.</li> </ul>	
Unavoidable Adverse Impacts	Potential exists for future development under the Proposed Action to result in adverse impacts. With the application of regulations, no significant unavoidable adverse impacts on aesthetics are anticipated, but project-level design review would be necessary to identify impacts and assign mitigation measures.	
<b>Population/Employment/Housing</b>		
Impacts	The added population in the Municipal Urban Growth Area (MUGA) under the Proposed Action would allow more than ample capacity to meet the MGUA population target. The added 800 jobs	The No Action Alternative is expected to increase employment. This would assist Woodway and the County in achieving the 620 job target and, similar to current circumstances, the excess employment capacity in the overall southwest Urban

	<b>Proposed Action</b>	<b>No Action Alternative</b>
	<p>would exceed the MUGA job target.</p> <p>Shoreline appears to have excess job capacity for its King County employment targets, and if the site were part of Shoreline, the Proposed Action would increase the excess employment capacity.</p>	<p>Growth Area (UGA) would help ameliorate the difference between job capacity and target.</p> <p>Shoreline has excess capacity to meet its employment target. If the Paramount site were part of Shoreline, the proposed No Action Alternative job capacity would increase the surplus capacity.</p>
Mitigation Measures	<p>Mitigation measures are not required in terms of population, employment, or housing impacts by themselves. Increases in population, employment, and housing do not conflict with growth targets. Development allowed under the Proposed Action or No Action Alternative may require mitigation to address potential impacts on the built and natural environments at both a non-project level as well as at the time a site-specific application is considered.</p>	
Unavoidable Adverse Impacts	<p>While employment will likely increase under the No Action Alternative, the increase would be much greater under the Proposed Action. The Proposed Action would also increase population and housing. Additional development and redevelopment of the Paramount site may result in secondary impacts on the natural and built environment and on the demand for public services.</p>	
<b>Transportation</b>		
Impacts	<p><b>Land Use and Trip Generation:</b> Commercial development generally tends to result in higher trip generation than residential development, for the same geographical area.</p> <p><b>Modal Split Assumptions:</b> It is expected that at full build-out, the site would have sufficient density to support transit routes to and from the site.</p> <p><b>Intersection Operations:</b> The Proposed Action would increase traffic volumes by greater than 50% at six intersections. Intersection LOS analysis reports for 2025 Proposed Action conditions indicate that operations at the ten nine intersections projected to exceed LOS standards under the No Action Alternative are expected to degrade further under the Proposed Action. In addition, four intersections projected to meet standards under No Action Alternative, are expected to exceed standards under the Proposed Action.</p> <p><b>Roadway Segment Operations:</b> The Proposed Action would <u>is projected to</u> increase traffic volumes on four roadway segments by greater than 50% as compared to the peak hour volumes under the No Action Alternative.</p> <p>Site-generated PM peak hour volumes are projected to exceed operational capacity on two roadway segments under Proposed Action conditions: <u>Richmond Beach Drive between Woodway town limits and NW 196th Street, and NW 196th Street between Richmond Beach Drive and NW</u></p>	<p><b>Land Use and Trip Generation:</b> Land use under the No Action Alternative is projected to continue as Heavy Industrial (HI), consistent with the County's current FLUM.</p> <p><b>Intersection Operations:</b> Ten Nine of the 23 analysis intersections are <u>expected projected</u> to operate below applicable level of service (LOS) standards during one or both of the peak hours. <u>The intersection located in Woodway is projected to operate at LOS B, which exceeds Woodway's adopted standard of LOS A, and thus is considered an impact.</u></p> <p><b>Roadway Segment Operations:</b> Though no roadways are projected to carry volumes that exceed their estimated operational capacities, nine road segments include intersections projected to exceed applicable LOS standards, which, in turn would affect overall operations along the roadway.</p>

Proposed Action	No Action Alternative
<p><u>20th Avenue. In addition to the nine road segments identified under the No Action Alternative that include intersections projected to exceed standards, three A total of 12 road segments include intersections that exceed standards under the Proposed Action.</u></p> <p><u>Safety: An increase in traffic volumes at intersections and roadway sections under the Proposed Action also increases the potential for collisions, due to the higher number of potential conflicts associated with vehicles. In particular, the section of Richmond Beach Drive between 15th Avenue and 3rd Avenue would need to be monitored closely, as it already experiences high collision rates, and would see a significant increase in traffic volumes as a result of the implementation of the Proposed Action.</u></p> <p><b>Traffic Circulation:</b></p> <p>As Richmond Beach Drive would provide the only access into and out of the site, all projected trips would travel on this roadway, so volumes are expected to increase substantially. <u>Under the proposed land use, this roadway would carry a much higher traffic volume and would also serve as the route for pedestrian and bicycle traffic in and out of the site. The current road is not built to sufficient standards to safely accommodate the expected mix of vehicular and non-motorized traffic under the Proposed Action.</u></p> <p>The majority of traffic generated under the Proposed Action is expected to travel NW 196th Street/NW 195th Street/Richmond Beach Road/N 185th Street.</p> <p><u>A moderate amount of p-Project-generated traffic is expected to travel on the primary north-south roads between Richmond Beach Road and SR 104. Increases are expected to occur along the 20th Avenue N/Timber Lane/Woodway Park Road corridor, but the total resulting volumes are not expected to be very high. Impacts are identified along this roadway because they exceed the adopted Woodway standard of LOS A. Moderate increases in traffic volumes are also expected along the 8th Avenue NW/100th Avenue W corridor.</u></p> <p>The projected increase in traffic under the Proposed Action would be expected to increase the potential for cut-through traffic on NW 190th Street, and thus is considered a potential impact.</p> <p>No other major paths are projected for traffic generated under the Proposed</p>	

Proposed Action	No Action Alternative
<p>Action, although localized increases in traffic have been projected at other analysis locations.</p> <p><b><u>Alternative Trip Distribution Scenario:</u></b>  <u>An alternative trip distribution scenario was assessed for the Final SEIS (see Section 3.11.5), which assumed a higher proportion of project-generated traffic traveling to/from King County. The scenario also assumed a higher proportion of traffic traveling on Richmond Beach Road/196th/195th/185th, between Richmond Beach Drive and SR 99, rather than choosing parallel routes. The alternative assessment did not result in the addition or removal of any impact locations identified in the Draft SEIS analysis. It did, however, result in a higher level of impact identified along Richmond Beach Road/196th/185th and SR 99, and a lower level of impact identified along the parallel routes.</u></p>	

Mitigation Measures

**Roadway Improvement Projects:**

Roadway improvement projects have been identified at any location at which a potential significant impact on roadway operations has been identified. Capacity mitigation projects include changes in traffic controls (such as upgrade from stop control to a traffic signal) or increases to the capacity of an intersection or roadway segment, and may involve multiple jurisdictions. See Table 3.11-16.

**Other Potential Mitigation Considered:**

- A second access road between the proposal site and adjacent roadway system at NW 205th Street could possibly serve to remove some of the additional demand that is projected on the NW 196th Street/Richmond Beach Road corridor as a result of the Proposed Action.
- It is possible that future enhanced transit service between the site and other regional destinations could reduce some of the additional capacity needed as a result of additional development at the proposal site.

**Planning Level Cost of Capacity Improvements:**

Under the GMA, local jurisdictions can require new development to pay the costs of improvements that are triggered by that development, as a condition of development approval. See Table 3.11-19 for planning level cost estimates developed for the capacity mitigation projects.

Road capacity improvements were identified as mitigation at nine intersections under the No Action Alternative.

Under the Proposed Action, all mitigation measures for the No Action Alternative are identified, combined with the following additional measures:

- Additional capacity improvement would be needed at four of the nine locations identified under the No Action Alternative.
- Capacity improvements were identified at four additional intersections not identified under the No Action Alternative.
- A need for road widening is identified for two roadway segments located near the project site: 1) Richmond Beach Drive between Woodway town limits and NW 196th Street, and 2) NW 196th Street between Richmond Beach Drive and 24th Avenue NW.
- A need for traffic calming is identified on NW 190th Street, between NW Richmond Beach Road and 8th Avenue NW.

	Proposed Action	No Action Alternative
		<p><u>Some of the mitigation measures identified to address capacity issues would also improve safety conditions. However, additional safety mitigation measures might be required to address potential safety issues resulting from higher traffic volumes on roadway sections and intersections, such as Richmond Beach Road. Safety improvements are likely to involve traffic-calming devices such as improved signing, bulb-outs, speed bumps, medians, or traffic circles.</u></p> <p><u>No Action Alternative travel demand assumptions were conservative, to allow a conservative assessment of potential cumulative impacts under the Proposed Action. Future vehicle volumes, under the No Action Alternative, may end up being lower than those reflected in this SEIS analysis, due to regional and local transit enhancements and other demand-oriented strategies. In this case, it is possible that 1) the need for some mitigation measures may not be triggered due to cumulative conditions being lower than what was programmatically evaluated, or 2) some mitigation measures identified under the No Action Alternative may alternatively be triggered by the Proposed Action.</u></p> <p><u>As this is a programmatic assessment, mitigation projects are intended to provide a conservative order-of-magnitude estimate of the level of mitigation that could be needed under full build-out of development that would be allowed under the Proposed Action and No Action Alternative. These measures were developed for the purpose of illustration, and do not represent commitments by the affected jurisdictions or by the applicant.</u></p> <p><u>It is expected that if the proposed land use designation and zoning were approved, subsequent project-level environmental analysis would include a detailed analysis to identify recommended improvements needed to support the actual development proposal, and could include demand-oriented measures as well as capacity improvements. It would also include a more detailed analysis to determine the appropriate agency and applicant commitments to future transportation improvements, based on the actual proposed development levels and phasing, and provide implementing mechanisms to ensure those commitments.</u></p> <p><u>An alternative trip distribution scenario was assessed for the Final SEIS (see Section 3.11.5), which assumed a higher proportion of project-generated traffic traveling to/from King County, and also assumed a higher proportion of traffic traveling on Richmond Beach Road/196th/185th, between Richmond Beach Drive and SR 99, rather than choosing parallel routes. The alternative assessment did not result in the addition or removal of any mitigation locations identified in the Draft SEIS analysis. It did result in a higher level of mitigation identified at one intersection (SR 99 and N 185th Street) and a lower level of mitigation identified at three intersections located along potential parallel routes.</u></p>
Unavoidable Adverse Impacts		Adoption of the proposed <u>land use designation</u> and zoning would be expected to result in increased traffic in the vicinity of the proposal site. Although the effects of additional vehicles on traffic congestion can be mitigated to varying degrees through the recommended transportation improvements, the actual increase in traffic is considered a significant unavoidable adverse impact.

**Police and Fire Protection and Emergency Medical**

Impacts	Proposed Action	No Action Alternative
	<p><b>Police:</b> Introduction of a concentration of residential and employment uses in the vicinity of the Paramount site would result in <del>an</del> a sharp increase in demand for police protection. This increase would require additional patrols and more police officers than are currently assigned to the site.</p> <p><b>Fire:</b> Currently, the Paramount site is not within the boundaries of any municipal or rural fire districts. Paramount contracts with the Shoreline Fire Department but <u>the department would discontinue first response service once the site redevelops as an Urban Center. The Construction of</u></p>	<p><b>Police:</b> No population increase would occur, but employment on site could experience a slight increase over existing conditions. This additional demand is minimal; however, and no significant impacts on police protection services are anticipated.</p> <p><b>Fire:</b> Because of the anticipated increase in fuel storage and distribution operations on site, the No Action Alternative is likely to generate an increased demand for fire protection services.</p>

	Proposed Action	No Action Alternative
	<del>the commercial and residential</del> development would likely generate greater demand for fire protection and emergency medical services than under the No Action Alternative.	
Mitigation Measures	<p><b>Police:</b> If the Proposed Action is implemented, the developer must coordinate with the Snohomish County Sheriff's Office to determine the necessity of additional officers and patrols.</p> <p><b>Fire:</b> <del>The County should assign</del> <u>The Paramount site shall either be assigned</u> to one of the rural fire districts <u>or shall contract with one of the adjacent municipalities</u> to ensure the availability of adequate fire protection and emergency medical services, both for residential emergencies and hazardous materials incidents. Alternatively, the current agreement with the Shoreline Fire Department could be extended.</p>	
Unavoidable Adverse Impacts	Over time, population growth and development will continue to increase the need for police and fire and emergency medical services under either alternative.	
<b>Parks</b>		
Impacts	The increase in population would generate additional demand for parks and recreation facilities in the area. While this population increase is below the level of service threshold for requiring an additional community park, <del>given the general lack of recreational opportunities in the immediate vicinity, it is likely that a perceived impact on parks and recreation facilities would occur.</del> <u>some additional recreational facilities would be required to serve the additional resident population.</u>	No additional demand for parks and recreation facilities would be generated.
Mitigation Measures	<ul style="list-style-type: none"> <li>Development impact fees and related park dedication requirements proportionate to the size of the proposed development would be required.</li> <li>Future development should also include parks and/or open space dedication as integral parts of the urban center design, and <u>both</u> the Snohomish County Parks Department <u>and the Shoreline Department of Parks, Recreation and Cultural Services</u> should be consulted during the design process. Additional parks and open space dedications may be made in lieu of impact fees.</li> </ul>	
Unavoidable Adverse Impacts	<del>With mitigation, no significant unavoidable adverse impacts on parks are anticipated.</del> <u>None.</u>	
<b>Schools</b>		
Impacts	The increased population of the school district would contribute to an overall increase in demand for education services, and would likely require use of portable structures.	No additional demand for school facilities would occur.
Mitigation Measures	<p>The localized increase in demand for educational services could be partially alleviated through the use of portable structures, though this does not represent a permanent solution.</p> <p>The school district does not currently collect impact fees; however, the County should coordinate with the district to ensure that future development is included in capital facilities planning efforts and identify potential funding measures for necessary improvements, including collection of impacts fees.</p>	
Unavoidable Adverse Impacts	<del>With mitigation, no significant unavoidable adverse impacts on schools are anticipated.</del>	

	Proposed Action	No Action Alternative
	<u>None.</u>	
<b>Water Systems</b>		
Impacts	<p>Development has the potential to generate significant impacts on water distribution through the introduction of a concentrated residential population and commercial area. Projections of future population and water demand assume approximately 77.3 gallons per capita per day (gpcd) of residential water consumption. Based on a potential population of 6,442, the Proposed Action could generate an additional demand for 0.50 million gallons per day (mgd). Potential commercial demand is difficult to determine with current information.</p> <p>The proposed high-density residential, commercial, and office uses would have significantly higher fire flow and storage requirements. Project-level review would be required to determine precise water demand and cost of infrastructure extension.</p>	<p>The No Action Alternative has the potential to result in a slight increase in water demand. Project-level review would be required to determine precise potable water and fire-flow requirements for any new development.</p>
Mitigation Measures	<p>If the Proposed Action is implemented, the Olympic View Water and Sewer District (District) would be made aware of the change in land use designation so that it may plan accordingly. Residential development would require extension of services to the site, as well as possible system upgrades to meet fire flow and storage requirements. Future development would require coordination with the County and the District to determine project-level infrastructure needs and identify necessary upgrades and appropriate mitigation measures.</p>	
Unavoidable Adverse Impacts	<p>Implementation of the Proposed Action would result in an overall increase in water consumption and a greater need for water distribution infrastructure to serve the site.</p>	
<b>Sanitary Sewer Systems</b>		
Impacts	<p>The Proposed Action would result in significant impacts on wastewater service. The increased density could generate peak flows of up to 2.2 mgd. Commercial development (assuming 20 gpcd) could generate an additional 17,920 gpd. Demand for wastewater transmission and treatment would exceed the capacity of both existing infrastructure and currently planned capital improvements.</p>	<p>Pipeline improvements and lift station upgrades planned by Ronald Wastewater District (RWD) have been designed to accommodate residential densities and would be more than adequate to handle flows from the increased employment under the No Action Alternative. With implementation of these capital improvements, no significant impacts on wastewater service are anticipated.</p>
Mitigation Measures	<ul style="list-style-type: none"> <li>▪ Residential development would require the extension of sanitary sewer services and connection to existing infrastructure.</li> <li>▪ Measures could include preparation of a pre-design study by the developer or a designated consultant, construction and dedication of the necessary infrastructure, or payment of impact fees to the RWD to defray the costs of construction.</li> <li>▪ The project proponent indicated that future development will incorporate green technologies intended to reduce wastewater volumes and the amount of land required for wastewater treatment. Specific methods and technologies would be evaluated during project-level review.</li> </ul>	
Unavoidable Adverse Impacts	<p>With implementation of appropriate mitigation measures, no significant unavoidable</p>	

	<b>Proposed Action</b>	<b>No Action Alternative</b>
	<del>adverse impacts on sanitary sewer are anticipated. <u>None.</u></del>	
<b>Telecommunications</b>		
Impacts	<p>A new, concentrated residential population would generate additional demand for telecommunication services, particularly telephone and cable; additional demand for wireless communication in the area could be satisfied without construction of project-specific infrastructure.</p> <p>Development would require extension of additional telephone lines and television/data cables throughout the site.</p>	No impacts on telecommunications are anticipated.
Mitigation Measures	Developers and property owners would be required to coordinate with service providers to ensure that adequate services are available at the site.	
Unavoidable Adverse Impacts	<del>With mitigation, no significant unavoidable adverse impacts on telecommunications are anticipated. <u>None.</u></del>	
<b>Solid Waste</b>		
Impacts	<p>The residential component could generate over 4,500 tons of solid waste per year. The Roosevelt Regional Landfill has substantial unused storage capacity to meet this demand, and solid waste collection service would be contracted individually by each property owner/manager. No significant impacts on solid waste service are anticipated.</p>	No significant impacts on solid waste collection and disposal are anticipated.
Mitigation Measures	None required.	
Unavoidable Adverse Impacts	While adequate capacity exists for disposal of solid waste generated at the Paramount site, the Proposed Action would still result in an overall increase in generation of solid waste in the County.	
<b>Power and Natural Gas</b>		
Impacts	<p><b>Power:</b> Conversion of the site for residential and commercial activity is unlikely to generate a significant increase in electrical demand when compared to regional capacity.</p> <p><b>Natural gas:</b> Natural gas service is not considered necessary to support development; therefore, Puget Sound Energy would not be required to extend service into areas where it does not currently have infrastructure.</p>	No significant power impacts are anticipated.
Mitigation Measures	Future development on the site would undergo project-level review to determine precise power and natural gas consumption and infrastructure requirements and any applicable impact fees.	
Unavoidable Adverse Impacts	While mitigation is anticipated to reduce impacts to less than significant levels, construction of the project would still result in an overall increase in demand for electric and natural gas infrastructure and, possibly, natural gas consumption.	

	Proposed Action	No Action Alternative
<b>Land Use</b>		
Impacts	<p><b>Displacement:</b> Land zoned and used for industrial purposes would be lost.</p> <p><b>Compatibility of Use:</b> If the area were to be developed piecemeal, there would be potential incompatibilities between new residential development and existing industrial facilities. However, as it is the intent of the property owner to redevelop the site as a whole, no industrial uses would remain to conflict with the new mixed-use development. The uses proposed would be more compatible with surrounding development than the industrial uses currently on the site.</p> <p><b>Intensity and Activity Levels:</b> The presence of high-density residential and commercial uses in close proximity could adversely affect low-density residential uses by creating increased noise, light and glare, and traffic congestion in the area.</p> <p><b>Indirect Impacts:</b> The County, Woodway, and Shoreline may experience increases in requests for rezoning.</p>	<p><b>Displacement:</b> No land uses would be introduced or displaced from the area, but the Paramount site could be expected to undergo additional industrial development to maximize the capacity of the facility.</p> <p><b>Compatibility of Use:</b> Expanded industrial uses would remain incompatible with surrounding development, which is entirely residential in nature.</p> <p><b>Intensity and Activity Levels:</b> The primary impact on surrounding development would be additional daily truck trips to and from the site. As such, the increase in activity levels would be felt most acutely by residents in Shoreline.</p> <p><b>Indirect Impacts:</b> None.</p>
Mitigation Measures	<ul style="list-style-type: none"> <li>▪ Implementation of traffic calming and noise abatement measures as a condition of development permit approval to reduce vehicular impacts on nearby residential development.</li> <li>▪ Establishment of a medium-density transitional area surrounding the urban center to provide a buffer between high and low densities.</li> <li>▪ Application of design standards or design review to minimize design incompatibilities with surrounding uses.</li> </ul>	
Unavoidable Adverse Impacts	<p>The Proposed Action represents a long-term change of land use for the site and a permanent loss of waterfront industrial property.</p>	
<b>Shoreline Use</b>		
Impacts	<p><b>Compatibility of Use:</b> The mixed-use nature of the proposed development would be likely to result in use of the shoreline area for recreation or residential uses, as opposed to industrial use. Residential and recreational uses would be more compatible with the ecological restoration objectives of the adjacent Woodway Urban Conservancy designation.</p> <p><b>Intensity and Activity Levels:</b> As shoreline access is a popular residential amenity, the increased population of the area has the potential to generate additional usage of the area by residents.</p> <p><b>Indirect Impacts:</b> Use of the property is anticipated to transition away from its current industrial function. Loss of this waterfront industrial property could potentially create additional demand for such facilities elsewhere in the region.</p>	<p><b>Compatibility of Use:</b> Existing use is not compatible with Woodway's shoreline regulations, which prohibit industrial uses in nearby shoreline areas.</p> <p><b>Intensity and Activity Levels:</b> The No Action Alternative is anticipated to increase both intensity and activity levels in the shoreline environment.</p> <p><b>Indirect Impacts:</b> No indirect impacts on shoreline use patterns are anticipated.</p>

	Proposed Action	No Action Alternative
	such as in the Urban shoreline zone of nearby Shoreline.	
Mitigation Measures	Locating higher-intensity shoreline uses away from the northern edge of the Paramount site, which borders Woodway's Urban Conservancy designation. Higher intensity uses should be located near the southern portion of the site, which borders Shoreline's Urban designation.	
Unavoidable Adverse Impacts	<del>There are no significant unavoidable adverse impacts to shoreline use patterns. None.</del>	
<b>Relationship to Plans and Policies</b>		
Impacts	<p><b>Affected Plans and Policies</b></p> <p>Snohomish County Shoreline Management Master Program (SMMP):</p> <p><u>Economic Development Element:</u></p> <ul style="list-style-type: none"> <li>Although the Proposed Action is not a water-dependent use it would provide access to the shoreline for the public so is partially consistent with policy 1 in this Element.</li> </ul> <p><u>Urban Environment Management Policies:</u></p> <ul style="list-style-type: none"> <li>The Proposed Action is not a priority Urban Environment land use as Urban Centers are not water-dependent and do not require frontage on navigable waters. However, the Proposed Action could result in the future development of permanent public access to the shoreline, which is not available under the No Action Alternative. The Proposed Action would promote the redevelopment and renewal of an obsolete urban shoreline area that could accommodate future water-dependent activities and make maximum use of the available shoreline resource. Therefore, the Proposed Action is partially consistent with this policy.</li> <li><del>The Proposed Action is consistent with the SMMP.</del></li> </ul> <p><u>General Policy Plan:</u></p> <ul style="list-style-type: none"> <li><del>The Proposed Action would make the existing industrial site eligible for redevelopment and intensification as an urban center and is, therefore, consistent with LU Policy 2.B.1.</del></li> <li><del>The Proposed Action is consistent with LU Policy 2.B.2. The Proposed Action would allow the development of a new urban center which would accommodate new commercial development and is adjacent to a designated commuter rail corridor. Sound Transit, the regional transit agency, has previously listed the adjacent Richmond Beach</del></li> </ul>	Since there would be no change to the relationship to plans and policies, the No Action Alternative was not considered in this chapter.

Proposed Action	No Action Alternative
<p>community as a potential site for a Sounder commuter rail station.</p> <ul style="list-style-type: none"> <li>▪ The Paramount site under the Proposed Action meets the locational criteria for the siting of an urban center. Because this is a non-project Draft SEIS and there is no site-specific proposal, it is not possible to evaluate all criteria at this time. The Proposed Action is generally consistent with LU Policy 3.A.2.</li> <li>▪ <del>The Paramount site is located adjacent to a regional high capacity transit route, Sounder commuter rail. The Proposed Action is consistent with LU Policy 3.A.3.</del></li> <li>▪ <del>The Proposed Action includes densities greater than 12 dwelling units per acre and, therefore, is consistent with LU Policy 3.A.4.</del></li> <li>▪ <del>The Paramount site is not listed as one of the designated urban centers on the FLUM in LU Policy 3.A.5. However, the Proposed Action would result in an additional urban center location on the FLUM in the comprehensive plan; therefore, the Proposed Action is consistent with LU Policy 3.A.5.</del></li> <li>▪ <del>The Proposed Action will be implemented through the UCDP regulations in SCC Chapter 30.34A and therefore is consistent with LU Policy 3.A.6.</del></li> <li>▪ The policy appears to require permit-level studies addressing all permitting considerations before considering redesignation of the Paramount site to UC. It is difficult at the programmatic/non-project level to determine "all permitting considerations" when an actual proposal has not been submitted. As the policy is not clear and since the level of study regarding permitting considerations would not be required until the development proposal application, the Proposed Action may not be consistent with LU Policy 5.B.12.</li> <li>▪ <del>The Proposed Action would allow development of high density residential units, which would add to the range of housing types available in the urban area. It is consistent with Objective HO 1.B.</del></li> <li>▪ <del>The Proposed Action would rezone the site to Planned Community Business (PCB) which is the only</del></li> </ul>	

Proposed Action	No Action Alternative
<p>implementing zoning designation for the UC land use designation. The PCB zoning designation allows for high density residential and mixed use development in an existing urban growth area. The Proposed Action is consistent with Objective HO 1.D.</p> <ul style="list-style-type: none"> <li>▪ The Proposed Action would allow redevelopment of an unincorporated "island" between Woodway and Shoreline. It is consistent with Policy HO 1.D.3.</li> <li>▪ The redesignation from UI to UC allows for housing in a mixed-use development; therefore, the Proposed Action is consistent with Policy HO 1.D.4.</li> </ul> <p>Countywide Planning Policies (CPPs):</p> <ul style="list-style-type: none"> <li>▪ Redesignation of this site would allow mixed use development and would provide additional capacity for population in the SW UGA. The Proposed Action would also increase employment on the site, adding to the current employment capacity. The residential densities and employment capacity projected in the Proposed Action description would support transit services; therefore the Proposed Action is consistent with Policy UG 8.</li> <li>▪ The Proposed Action would use land efficiently in the SW UGA consistent with this policy. The time needed for the conversion of the subject properties from an industrial use to a mixed use development will allow time for coordination of capital facilities and the extension of urban services to accommodate the projected population and employment capacity. Therefore, the Proposed Action is consistent with Policy OD 1.</li> <li>▪ This policy is about "encouraging policies" so is not directly related to the Proposed Action. However, if the Proposed Action were approved as outlined in the project description, it would provide jobs and housing on the site, therefore, providing consistency with Policy OD 8.</li> </ul> <p><b>Annexation Jurisdiction</b></p> <p>Both Woodway and Shoreline policies indicate the potential to annex the Point Wells site. To achieve consistency, the County, Woodway, and Shoreline should enter into conversation for the purpose of</p>	

Proposed Action	No Action Alternative
<p>agreement and amendment of each jurisdiction's respective policies so that all reflect the same vision for jurisdictional boundaries.</p> <p><b>Woodway Shoreline Master Plan:</b></p> <ul style="list-style-type: none"> <li>▪ Since the Proposed Action is a programmatic/non-project action, application of these policies is appropriate at the time of development review.</li> </ul> <p><b>Woodway Comprehensive 2004 Plan Update – Land Use Goals and Policies:</b></p> <ul style="list-style-type: none"> <li>▪ Policies LUG-9 and LUG-10 call for coordination among jurisdictions to implement the land use plan and to prepare regulations to effectively implement development on the Point Wells site. The Proposed Action is being reviewed through the County's docket process which requires early and continuous public notice and participation including the involvement of property owners and other affected and interested individuals, tribes, cities, utility districts, businesses, and other organizations and government agencies.</li> <li>▪ Adequate urban-level public facilities and services exist to support the Proposed Action; therefore it is consistent with LUP-1.</li> <li>▪ The Proposed Action would allow higher density residential development than that found in surrounding residential uses and is supported by adequate levels of public facilities and services. Impacts on traffic and the natural environment are analyzed in this Draft SEIS; therefore the Proposed Action is consistent with LUP-4.</li> <li>▪ Regarding LUP-18, at this time, policies in the Woodway Comprehensive Plan relating to Point Wells have not been adopted by the County.</li> <li>▪ Regarding LUP-19, at this time, an interlocal agreement with Woodway has not been adopted by the County.</li> <li>▪ The Proposed Action relates to only the waterfront area and a portion of land situated east of and adjacent to the BNSF railroad tracks and existing overpass. As the Proposed Action is requesting a change from industrial, it would not be consistent with LUP-20.</li> </ul>	

	Proposed Action	No Action Alternative
	<ul style="list-style-type: none"> <li>▪ As the Proposed Action is requesting a change from industrial, it would not be consistent with LUP-21.</li> <li>▪ There is not enough information available to determine if the Proposed Action would be consistent with LUP-27.</li> </ul> <p>Woodway Comprehensive 2004 Plan Update–Transportation Goals and Policies:</p> <ul style="list-style-type: none"> <li>▪ Coordinated planning has not occurred yet, thus the Proposed Action is partially consistent with TP-3.</li> </ul> <p>Woodway Comprehensive 2004 Plan Update–Point Wells Land Use:</p> <ul style="list-style-type: none"> <li>▪ <del>Although there is some</del> Because of inconsistencies within the Subarea Plan, <del>it appears</del> the Proposed Action would <del>not</del> be consistent with <u>parts of the Point Wells Subarea Plan and not consistent with other parts.</u></li> </ul> <p>City of Shoreline Shoreline Management Master Program:</p> <ul style="list-style-type: none"> <li>▪ There is not enough information at this time to determine if the Proposed Action would be entirely consistent with Shoreline’s SMMP goals and policies.</li> </ul> <p>City of Shoreline Comprehensive Plan–Land Use Goals and Policies:</p> <ul style="list-style-type: none"> <li>▪ Regarding LU-17, there is not enough information to determine if the development allowed under the Proposed Action would be consistent with all criteria of the Mixed Use designation.</li> <li>▪ The Proposed Action is consistent, to date, with LU56.</li> </ul> <p>City of Shoreline Comprehensive Plan–Transportation Goals and Policies:</p> <ul style="list-style-type: none"> <li>▪ Not enough information is available at this point to determine complete consistency.</li> </ul>	
Mitigation Measures	<p><u>For the Proposed Action to achieve consistency with the County’s SMMP Urban Environment Management Policies, the County could adopt the following mitigation measure:</u></p> <p><u>Require permanent public access to a shoreline of statewide significance as part of any new multifamily residential, commercial, or mixed use development.</u></p> <p>For the Proposed Action to achieve consistency with the County’s objectives and policies, the following policies could be amended and/or clarified:</p> <ul style="list-style-type: none"> <li>▪ Policy LU 5.B.12. “To clarify the policy, the following amended language could be considered (new language underlined): “Within the Southwest UGA, parcels designated Urban Industrial (on Point Wells) shall be considered for future redesignation from Urban Industrial to ((Mixed Use))Urban ((c))Center designation</li> </ul>	

Proposed Action	No Action Alternative
	<p>upon ((receipt))<u>issuance of ((necessary studies)) a programmatic, non-project environmental impact statement addressing ((all permitting considerations such as site development,)) environmental impacts, <u>infrastructure</u> and ((issues)) <u>the provision of urban services.</u>"</u></p> <ul style="list-style-type: none"> <li>▪ <u>Any future proposal under the UC designation will clearly demonstrate how access to high-capacity transit routes that meet the appropriate level of service will be provided.</u></li> <li>▪ <u>UC designation is contingent on the availability of high-capacity transit service that offers all-day availability of transit, pedestrian and bicycle facilities, connectivity to surrounding communities and includes a planning process that involves citizens, agencies, and surrounding jurisdictions.</u></li> </ul> <p>For the Proposed Action to achieve consistency with Woodway's goals and policies, the following could occur:</p> <ul style="list-style-type: none"> <li>▪ Coordination between the County and Woodway regarding planning and regulations and an interlocal agreement would need to occur to be consistent with LUG-10, LUP-18 and LUP-19.</li> <li>▪ Urban-level services would need to be in place to be consistent with LUG-4 and LUP-1.</li> <li>▪ Woodway could amend LUP-20 and LUP-21 to designate the Paramount site as mixed use.</li> </ul> <p>For the Proposed Action to achieve consistency with Shoreline's goals and policies, the following could occur:</p> <p>As the relevant transportation goals require coordination with Shoreline's neighboring jurisdictions to assess the impact of new development on the transportation system, including mitigation and funding, the affected jurisdictions could meet to determine transportation strategies.</p>
Unavoidable Adverse Impacts	<del>No significant unavoidable adverse impacts are expected. None.</del>



# Chapter 2. Description of Proposal and Alternatives

## 2.1. Overview

This chapter of the Final Supplemental Environmental Impact Statement (Final SEIS) provides a brief description of the Proposed Action. The Proposed Action addressed in this SEIS is the adoption of an amendment to the Growth Management Act (GMA) Comprehensive Plan's Future Land Use Map (FLUM) and associated rezone for the Paramount of Washington LLC property located at Point Wells.

The information in the Final SEIS is presented in programmatic and abbreviated fashion given the nature of the Comprehensive Plan proposal as a nonproject action. This Final SEIS should be reviewed in tandem with the Draft SEIS, as the Final SEIS does not repeat the detailed Proposal Description, Environmental Review, Affected Environment, or Impact and Mitigation Measures, but rather clarifies and corrects information as appropriate. The SEIS supplements the EIS issued in 2005 for the 10-Year Update of Snohomish County's (County's) GMA Comprehensive Plan.

## 2.2. Planning Area

The County is located on Puget Sound, between Skagit County to the north and King County to the south. The County GMA Comprehensive Plan addresses all unincorporated areas of Snohomish County. Within the County, land is generally classified as urban, rural, or resource.

The Paramount site is designated Urban Industrial (UI) and lies in an unincorporated portion of the Southwest Urban Growth Area (UGA), near the Town of Woodway (Woodway) and the City of Shoreline (Shoreline) in King County to the south. This docket proposal would change the type of allowed urban land uses and could intensify activities on the site.

### Organization of the Final SEIS

Chapter 1 of this Final SEIS contains a summary of the impacts and mitigating measures associated with the Proposed Action and the No Action Alternative. Chapter 2 contains a description of the Proposed Action and the No Action Alternative. Chapter 3 contains any clarifications or corrections to the environmental analysis in the Draft SEIS issued February 6, 2009, based on responses to

comments presented in Chapter 4. Chapter 4 contains comments received on the Proposed Action during the Draft SEIS comment period and responses to those comments. Chapter 5 provides a list of the agencies and organizations that have been notified of the availability of the Final SEIS. Chapter 6 provides a list of references cited in this Final SEIS.

## 2.3. Proposed Action and No Action Alternative

The Proposed Action is for an amendment to the Snohomish County GMA Comprehensive Plan FLUM and associated rezone, as described below.

**Table 2-1. SEIS Docket Proposals**

Docket Proposal	Location	Proposed Action	Scope of Environmental Review in SEIS
Paramount of Washington LLC (SW 41)	Southwest border of the County abutting Woodway and Shoreline; at northwest terminus of Richmond Beach Drive	Redesignate from Urban Industrial (UI) to Urban Center (UC) <u>and rezone from Heavy Industrial (HI) to Planned Community Business (PCB)</u>	Earth and Soil and Groundwater Contamination; Surface Water, <del>Water Quality, and Drainage</del> ; Wetlands; Fisheries; Wildlife and Vegetation; Air Quality; Noise; Cultural Resources; Aesthetics; Population, Employment, and Housing; Transportation; Public Services (Police, Fire and Emergency Medical Services; Parks; Schools; Water Systems; Sanitary Sewer Systems; Telecommunications; Solid Waste; Power and Natural Gas); Land and Shoreline Use Patterns; Relationship to Plans and Policies.

The No Action Alternative assumes that the individual docket proposals are not adopted and the existing FLUM and zoning designations and policies continue as allowed under existing County plans, policies, and regulations. No changes have been proposed to the No Action Alternative and it is not discussed further in this Final SEIS.

## Chapter 3. Additional Information and Corrections

The Draft SEIS analyzed potential impacts associated with the Proposed Action and No Action Alternative. This chapter of the Final SEIS includes clarifications or changes to the Draft SEIS based on responses to comments presented in Chapter 4 of this Final SEIS, or based on County review of the Draft SEIS. The clarifications or corrections are organized in the same order as the Draft SEIS sections.

Text that has been deleted shows in ~~strikeout~~ format. New text is underlined.

### Changes to Draft SEIS Chapter 1.4 Environmental Impacts and Proposed Mitigation Measures

#### 1.4.4. Summary of Impacts and Mitigation Measures

The full text of the Affected Environment, Impacts, and Mitigation Measures section of the Draft SEIS is presented in Chapter 3. Summary statements presented in Table 1-2 are considerably abbreviated from the full discussion in Chapter 3 and do not include explanations of terminology. Summary statements of the potential impacts also appear here in the absence of the context of existing environmental conditions (the Affected Environment discussion in Chapter 3). For those reasons, readers are encouraged to review the more comprehensive discussion of issues of interest in Chapter 3. ~~to formulate the most accurate impression of impacts associated with the Proposed Action and No Action Alternative.~~

### Changes to Draft SEIS Chapter 2.2 Proposed Action and No Action Alternative

#### 2.2.1. Proposed Action

The Proposed Action would amend the GMA Comprehensive Plan FLUM (Figure 2-2) and zoning map to:

- intensify the Southwest UGA/Woodway Municipal Urban Growth Area (MUGA) by designating Urban Center (UC) instead of Urban Industrial (UI) and changing the zoning from Heavy

Industrial (HI) to Planned Community Business (PCB) on an approximate 61-acre site along Puget Sound,

- provide consistency with the County’s GMA Comprehensive Plan elements and policies,
- assure continued compliance with the GMA and Countywide Planning Policies (CPPs),
- allow for a range of housing types affordable to different income levels, and
- provide for employment growth proportionate to population growth.

### 2.2.2. No Action Alternative

The No Action Alternative is required by SEPA and would retain present comprehensive plan and zoning designations and present UGA boundaries. Where sites are developed at lesser intensities than adopted plans/zoning would allow, it is possible that further development or activities could occur between the present and the County’s plan horizon year of 2025.

### 2.2.3. SEIS Docket Proposal

The request to amend the County’s GMA Comprehensive Plan is summarized in Table 2-2.

The proposal request is described in terms of proponent, location, site characteristics, proposal objectives, requested actions, and alternatives.

**Table 2-2. Paramount Comprehensive Plan Future Land Use Map Amendment and Rezone Request**

Project No./Proponent	General Location	Approx. Acres	Future Land Use Map (FLUM) Designation	Zoning
Paramount of Washington LLC (SW 41)	Southwest border of the County abutting Woodway and Shoreline; at northwest terminus of Richmond Beach Drive	61 acres including tidelands	Current: UI Proposed: UC	<u>Current: HI</u> <u>Proposed: PCB</u>

# Changes to Draft SEIS

## Chapter 3.1 Earth and Soil and Groundwater Contamination

### 3.1.2. Soil and Groundwater Contamination

#### *Impact Analysis*

##### **No Action Alternative**

The No Action Alternative would retain the existing FLUM designation of Urban Industrial (UI) and the existing zoning of Heavy Industrial (HI). Current land use designations prohibit residential and commercial building on the property. In the absence of residential or commercial buildings on the property, public exposure to contaminated soil, groundwater and potentially soil vapors is limited.

Because of the nature of operations at this site, it is subject to the U.S. Coast Guard Maritime Security (MARSEC) requirements. Under these requirements, the site is secured, which prevents the public from exposure to the on-site contamination. Under the No Action Alternative, Paramount would continue with the current remediation program being conducted under Ecology's Outfall 2 NPDES permit. The pace of this remediation would be affected by the continued presence of the current operating facilities. Should the Proposed Action be approved and development permitted, Paramount would cease the current petroleum operations. The site would be decommissioned and remediation activities would be accelerated (Huff pers. comm.).

The No Action Alternative would likely result in continued petroleum-based operations and an increase to the operation's capacity. The site still contains all the necessary elements of an operational refinery. Historically, the up to 5,000 barrels of petroleum per day have been refined on site. Under existing zoning, Paramount has the option to restart refinery operations. ~~Paramount would also consider restarting the asphalt plant~~ (Huff pers. comm.).

#### *Mitigation Measures*

Soil and groundwater contaminants present at concentrations above the MTCA cleanup limits include total petroleum hydrocarbons (gasoline, diesel, and oil range), BTEX compounds, and lead. Soil and groundwater sampling and characterization activities are ongoing.

Recommended mitigation measures are as follows:

- Continue to implement the existing soil sampling program to identify and characterize the extent of soil contamination on the site.
- Develop a plan to remediate contamination identified by the soil sampling program. Depending on conditions encountered at the site, remediation methods such as excavation, segregation, and/or capping of affected soils may be necessary.

- Evaluate the potential for soil vapor intrusion associated with volatile contaminants such as benzene. The Washington State Department of Ecology (Ecology) would require cleanup of the site or the implementation of soil vapor engineering controls before residential or commercial development could occur, or as part of building design and construction.
- Assess the need for an off-gassing or a subsurface vapor collection system.
- Continue operating the existing groundwater extraction and treatment system. Evaluate technologies to increase cleanup efficiencies.
- Institute controls to prevent future use of site groundwater for drinking water or irrigation purposes.

### *Significant Unavoidable Adverse Impacts*

Under ~~both the Proposed Action and the~~ No Action Alternative, Ecology would require that the soil and groundwater remediation and characterization activities continue.

Under the Proposed Action, ~~the following~~ no significant unavoidable adverse impacts ~~could~~ would be expected:

- ~~Significant potential for soil vapor would likely emanate from subsurface contamination to concentrate over time, thereby creating ‘pockets’ of trapped vapor contamination.~~
- ~~Institutional controls would likely be required to prevent future use of site groundwater for drinking water or irrigation purposes.~~

## Changes to Draft SEIS Chapter 3.4 Fisheries

### 3.4.2. Impact Analysis

#### *Proposed Action*

Under the Proposed Action, the Paramount site would change from an industrial site to a high density, mixed-use area. This change would result in the removal of petroleum products and asphalt manufacturing and storage facilities from the site. Transfer of petroleum products would discontinue, and commercial space, residential dwellings, and associated development would eventually be built. Discontinuing ship traffic and the use and transfer of petroleum products associated with the existing site use would ~~reduce~~ eliminate the potential risk of oil spills, which can have extensive detrimental effects on fish and aquatic habitat.

## Changes to Draft SEIS Chapter 3.5 Wildlife and Vegetation

### 3.5.1. Wildlife

#### *Impact Analysis*

##### Proposed Action

The Proposed Action would change the County's Future Land Use Map (FLUM) designation of the site from Urban Industrial (UI) to Urban Center (UC). A UC designation would allow for redevelopment of the site as a mixed-use, planned community with regional retail, services, and high-density housing. Any redevelopment that occurred on the site would have to meet current code requirements for shoreline setbacks and wetland buffers.

Access to the Paramount site is currently restricted and although industrial activity occurs, the level of human activity in the tidal area is low. If redevelopment to mixed use were to occur, the level of human activity in the tidal area could be expected to increase. Point Wells beach to the south is heavily used by clam diggers and beachcombers (King County 2008a), and similar use could be expected as a result of allowing public access to the site's beaches. This could reduce the potential for wildlife usage of the site, as wildlife may be disturbed by the presence of humans.

Wildlife currently using the site are expected to be acclimated to noise and activity associated with industrial use of the site, train traffic to and through the site, and ongoing construction of the Brightwater outfall to the south of the site. Some individuals may be disturbed by noise and activity associated with redevelopment, but others would likely not be disturbed because of acclimation. Following redevelopment, noise levels on the site may be lower because of decreased industrial activity and train traffic to the site and increased vegetative cover that would provide some noise attenuation.

Redevelopment of the site could benefit bald eagles by providing perch trees closer to the shoreline from which they could forage, particularly if native tree species such as Douglas-fir and western red cedar are planted in the shoreline buffer. It would, however, take several years for these trees to grow to a size suitable for bald eagle use. Increased human activity along the shoreline may discourage use by bald eagles, although individual eagles vary in their sensitivity to humans and eagles nesting in this relatively urban area may be acclimated to human activity.

Redevelopment for mixed use may benefit species that are commonly found in association with human development; however, it would likely include landscaping that could provide nesting or foraging habitat for these species. If wetland buffers or shoreline setbacks are restored using native plant species, additional wildlife habitat would be created on the site.

Under the Proposed Action, the dock on the site would no longer be used for transferring fuel for either fuel storage and distribution areas or for marine fueling operations, which would ~~reduce~~ eliminate the risk of water contamination from an oil or fuel spill that could impact marine mammals, birds, and invertebrates.

Lowering the overall risk of fuel spills into Puget Sound would benefit southern resident killer whales by reducing their risk of contamination. Puget Sound is included in the area designated as critical habitat for southern resident killer whales (71 FR 69054-69070). Redevelopment of the Paramount site could benefit critical habitat for the species by restoring a shoreline buffer, thereby incrementally improving water quality in the area.

### *Significant Unavoidable Adverse Impacts*

~~There are no significant unavoidable adverse impacts.~~

Under the Proposed Action, the level of human activity in the tidal area could be expected to increase, which could reduce the potential for wildlife usage of the site, as wildlife may be disturbed by the presence of humans.

## 3.5.2. Vegetation

### *Significant Unavoidable Adverse Impacts*

~~There are no significant unavoidable adverse impacts.~~

Under the Proposed Action, it is expected that the shoreline/tidal area would be accessible to people for the purposes of beachcombing and clam digging, which could potentially impact marine vegetation.

## Changes to Draft SEIS Chapter 3.11 Transportation

### 3.11.1. Affected Environment

#### *Level of Service Standards*

##### City of Shoreline

Shoreline's adopted LOS standard is specified in the Transportation Element of the City's Comprehensive Plan (City of Shoreline 2005a).

- **Transportation Policy T13.** Adopt LOS E at the signalized intersections on the arterials within the city as the LOS standards for evaluating planning level concurrency and reviewing traffic impacts of developments, excluding the Highways of Statewide Significance (Aurora Avenue N and Ballinger Way NE). LOS shall be calculated with the delay method described in the Transportation Research Board's Highway Capacity Manual 2000 or its updated versions.

Although Policy T.13 excludes Aurora Avenue N, it is noted that the Aurora Corridor Improvement Project, N 165th Street – N 205th Street, which consists of widening the road to include business access and transit (BAT) lanes, median and turn lanes, sidewalks, and some intersection improvements, has been designed to meet a goal of LOS E (CH2M Hill and Jones & Stokes 2007).

As the Aurora Corridor Improvement Project has been approved by the Washington State Department of Transportation (WSDOT), a goal of LOS E was also applied to State Route (SR) 99 (Aurora Avenue N).

Other Shoreline policies potentially relevant to this Draft SEIS analysis are listed below.

- **Transportation Policy T45.** Work with neighborhood residents to reduce speeds and cut-through traffic on non-arterial streets with education, enforcement, traffic calming, signing, or other techniques. Design new residential streets to discourage cut-through traffic while maintaining the connectivity of the transportation system.
- **Transportation Policy T47.** Monitor traffic growth on collector arterials and neighborhood collectors and take measures to keep volumes within reasonable limits.
- **Transportation Policy T69.** Pursue methods of reducing the impact on Richmond Beach Drive at the King/Snohomish County line (e.g., closing) if the Point Wells property is not annexed by the Shoreline. Consider the extension of 205th only as potential mitigation for future development of Point Wells.

### Washington State Department of Transportation

For Highway of Statewide Significance (HSS) facilities, WSDOT has established LOS thresholds of LOS D in urban areas, and LOS C in rural areas (WSDOT 2005). Both state highways (SR 99 and SR 104) are HSS facilities. However, as noted earlier in this section, the Aurora Corridor Improvement Project, N 165th Street – N 205th Street has been designed to meet a goal of LOS E (CH2M Hill and Jones & Stokes 2007). As the Aurora Corridor Improvement Project has been approved by WSDOT, a goal of LOS E was also applied to SR 99 (Aurora Avenue N) within Shoreline.

For non-HSS facilities, WSDOT indicates that the LOS thresholds adopted by the local MPO/RTPO shall apply. However, no non-HSS state highways are included in the study area for this analysis.

## 3.11.2. Impact Analysis

### *No Action Alternative*

Future traffic volumes at analysis intersections and on analysis roadway segments under the No Action Alternative were forecasted using the County's travel demand model, and reflect conditions expected to result under the adopted Future Land Use Map (FLUM). The No Action Alternative is described in detail in Chapter 2 of this Draft SEIS.

The City of Shoreline (Shoreline) has planned future improvement to Aurora Avenue (SR 99) between N 165th Street and N 205th Street. At of the time of development of this SEIS, Shoreline has identified funding for the first mile of this project, between N 165th Street and N 185th Street, and an expected project completion time frame prior to 2015. Therefore, planned intersection improvements along this segment of SR 99 were assumed to be in place for the 2025 No Action analysis. At the SR 99/N 175th Street intersection, planned improvements consist of an additional right-turn lanes in

the northbound, southbound, and westbound directions; a second left-turn lane in the westbound direction; and a protected left-turn traffic signal phase for the eastbound and westbound directions. At the SR 99/N 185th Street intersection, planned improvements consist of removing the existing second northbound left-turn lane; adding right-turn lanes in the southbound and eastbound directions; and including a protected left-turn traffic signal phase for the eastbound and westbound directions (City of Shoreline 2007).

## Traffic Forecasts

A travel demand forecasting model was developed to project future year traffic volumes within the study area. The technical report that documents the model development is provided in Appendix E of this Draft SEIS. The Snohomish County Department of Public Works provided the base year model platform for this study. The model is based on an EMME platform and consists of four-step process similar to the Puget Sound Regional Council (PSRC) model. Land use in Snohomish County was based on the adopted County FLUM. For areas outside of the County, PSRC future land use projections were used. These land use assumptions reflect the latest information regarding existing and future population and employment growth in and around the study area.

The model was validated based on the traffic counts that were collected in the study area. The existing year network was enhanced in the Points Wells and surrounding areas by adding many local streets that otherwise are not included in the County or PSRC models. The transportation analysis zone system was modified in the study area to better capture the traffic on the minor arterial and collector roadways. County staff provided the base year land use for the new split zones. The existing year trip table was created based on this finer zone system. The validation focused on I-5, SR-99 and major arterials in the surrounding areas, and included minor arterials and collectors in the study area.

Once the model was validated for both AM and PM conditions, it was used as the basis to develop the future year models. The network was built on the existing year validated network based on planned projects through 2025. County staff provided future year base trip tables that were assigned to create future year base roadway volumes.

Within the Paramount site, the No Action Alternative land use reflected development expected under build-out of the current County FLUM. Land use outside the Paramount site was based on regional population and employment forecasts.

## Intersection Operations

The No Action Alternative model output volumes were post-processed to project AM peak hour and PM peak hour traffic volumes at intersections. The projected AM peak hour and PM peak hour intersection traffic volumes are provided Tables B-4 and B-5, respectively, in Appendix C of this Draft SEIS.

Table 3.11-8 summarizes projected 2025 LOS under the No Action Alternative (see also Figure 3.11-4). The intersection LOS analysis reports for 2025 No Action Alternative conditions are provided in Appendix D of this Draft SEIS. The table shows that the following ~~10~~nine of the 23

analysis intersections are ~~expected~~ projected to operate below applicable LOS standards during one or both of the peak hours:

- (1) 244th Street SW and SR 99 (AM and PM peak hours),
- (2) 244th Street SW and Fremont Avenue N (PM peak hour),
- (4) 244th Street SW and 100th Avenue W (PM peak hour),
- (5) SR 104 and 100th Avenue W (AM and PM peak hours),
- (6) Algonquin Road and Woodway Park Road (AM and PM peak hours),
- (16) N 185th Street and SR 99 (AM and PM peak hours)
- ~~▪ (17) N 175th Street and 6th Avenue NW (AM peak hour),~~
- (20) N 175th Street and SR 99 (PM peak hour),
- (21) Carlyle Hall Road and Dayton Avenue N (AM peak hour), and
- (23) N 160th Street and Greenwood Avenue N (AM peak hour).

Of these ~~10~~ nine intersections, ~~six~~ five are located in Shoreline, two are located in Edmonds, one is located on the Shoreline/Edmonds city boundary, and one is located in Woodway. The intersection located in Woodway is projected to operate at LOS B, which reflects a relatively low level of delay; however, it exceeds Woodway's adopted standard of LOS A, and thus is considered an impact.

The 2025 LOS results for the No Action Alternative reflect a conservative estimate of future roadway conditions, based on a build-out of regional land use projected by the County and PSRC. This programmatic SEIS seeks to assess the "worst case" cumulative conditions, for the purpose of determining an order-of-magnitude effect of the proposed change in land use designation and zoning on the transportation system. Thus, the analysis assumes that historical mode split trends would continue into the future, resulting in a higher proportion of vehicle traffic.

However, planned transit enhancements on SR 99 and other demand-oriented strategies planned by the cities within the study area are likely to result in a future No Action vehicle demand that is lower than the levels reflected in this SEIS analysis. It is appropriate to reflect commitments to enhanced demand-oriented measures in future project-level analysis which, unlike programmatic analysis, can include mechanisms by which such commitments can be ensured.

**Table 3.11-8. Intersection Level of Service–No Action Alternative**

Intersection	Existing Traffic Control	AM Peak		PM Peak		LOS Standard	Jurisdiction
		LOS Average Delay (sec/veh)	Average Delay (sec/veh) LOS	LOS Average Delay (sec/veh)	Average Delay (sec/veh) LOS		
1 244th Street SW and SR 99	Signal	F	173	F	115	E/D (SR 99 HSS)	Shoreline/Edmonds/WSDOT
2 244th Street SW and Fremont Avenue N	Northbound Stop-Control	E	46	F	71	E	Shoreline
3 Firdale Avenue N and 244th Street SW	Northbound Stop-Control	C	18	B	14	D	Edmonds
4 244th Street SW and 100th Avenue W	Eastbound/ Westbound Stop-Control	C/C	18/24	A/F	9/53	D	Edmonds
5 SR 104 and 100th Avenue W	Signal	E	68	F	133	D (SR 104 HSS)	Edmonds/WSDOT
6 Algonquin Road and Woodway Park Road	Eastbound/ Westbound Stop-Control	B/B	12/11	A/B	0/15	A	Woodway
7 238th Street SW and Woodway Park Road	All-way Stop-Control	A	8	A	9	A	Woodway
8 NW 196th Street and Richmond Beach Drive	Westbound Stop-Control	A	9	A	9	E	Shoreline
9 NW 196th Street and 20th Avenue NW	All-way Stop-Control	B	10	B	11	E	Shoreline
10 NW 195th Street and 15th Avenue NW	Northbound/ Southbound Stop-Control	B/C	14/19	A/D	10/26	E	Shoreline
11 Richmond Beach Road and 15th Avenue NW	All-way Stop-Control	B	10	B	12	E	Shoreline
12 Richmond Beach Road and 8th Avenue NW	Signal	E	65	E	62	E	Shoreline
13 Richmond Beach Road and 3rd Avenue NW	Signal	C	27	A	10	E	Shoreline
14 Richmond Beach Road and Dayton Avenue N	Signal	B	15	B	12	E	Shoreline
15 N 185th Street and Fremont Avenue N	Signal	C	33	D	36	E	Shoreline
16 N 185th Street and SR 99	Signal	F	<del>192</del> 90	F	<del>192</del> 107	E (SR 99 HSS)	Shoreline/WSDOT
17 N 175th Street and 6th	Southbound	F	57	C	17	E	Shoreline

Intersection	Existing Traffic Control	AM Peak		PM Peak		LOS Standard	Jurisdiction
		LOS Average Delay (sec/veh)	Average Delay (sec/veh) LOS	LOS Average Delay (sec/veh)	Average Delay (sec/veh) LOS		
Avenue NW	Stop-Control						
18 St Luke Place N and Dayton Avenue N	Eastbound Stop-Control	C	24	B	14	E	Shoreline
19 N 175th Street and Fremont Avenue N	Signal	B	12	A	8	E	Shoreline
20 N 175th Street and SR 99	Signal	<u>E-D</u>	<u>79-49</u>	<u>F-E</u>	<u>91-56</u>	E (SR 99 HSS)	Shoreline/ WSDOT
21 Carlyle Hall Road and Dayton Avenue N	All-way Stop-Control	F	104	E	46	E	Shoreline
22 N Innis Arden Way and Greenwood Avenue N	Eastbound Stop-Control	C	20	B	13	E	Shoreline
23 N 160th Street and Greenwood Avenue N	All-way Stop-Control	F	58	D	26	E	Shoreline

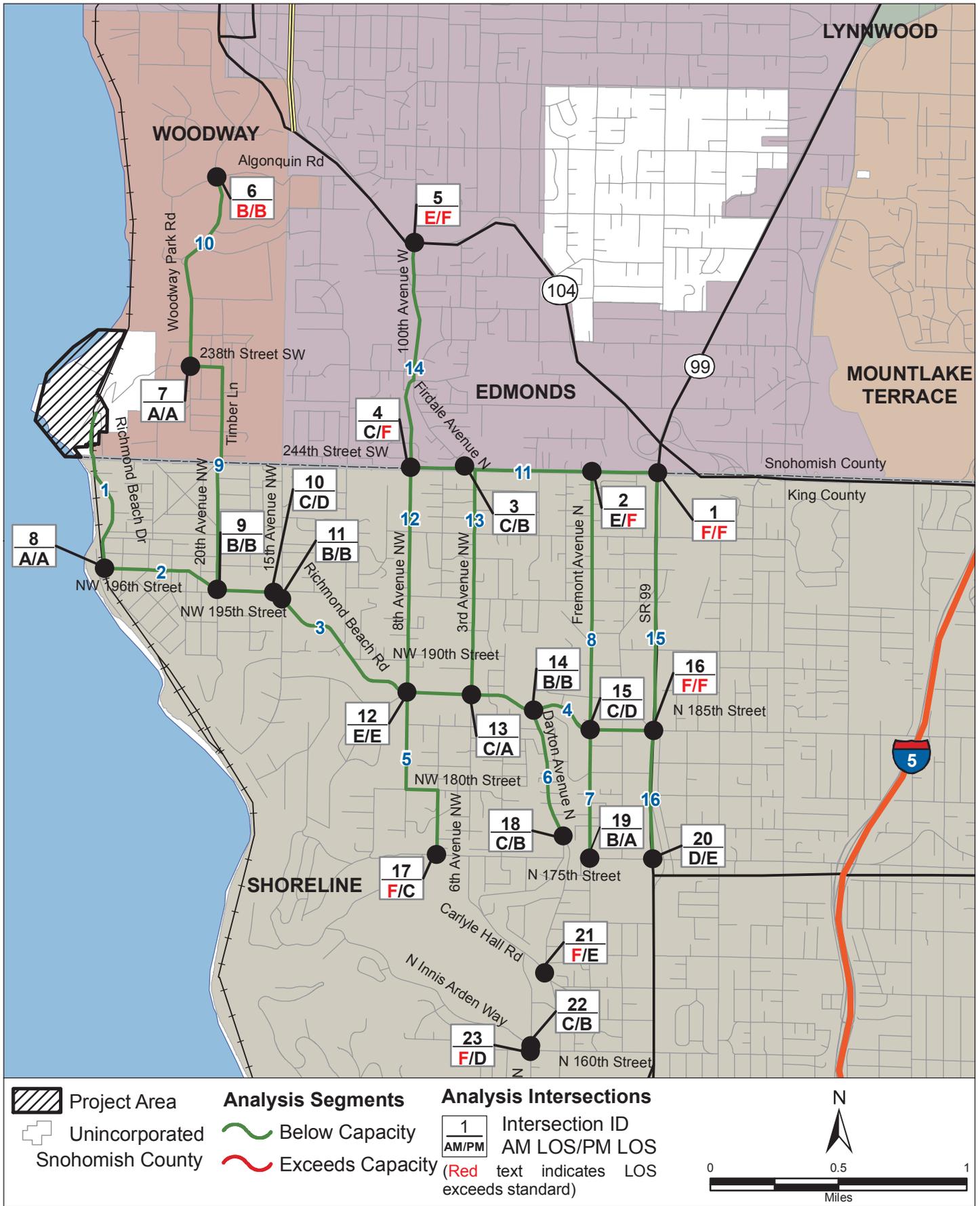
HSS = Highway of Statewide Significance

### Roadway Segment Operations

Table 3.11-9 summarizes projected operating conditions of the analysis roadway segments under the No Action Alternative (see also Figure 3.11-4). The table shows that traffic volumes on some roadways are projected to increase substantially under the No Action Alternative. In particular, roadways in the northeast section of Shoreline (including and northeast of 8th Avenue NW and Richmond Beach Road/N 185th Street) are expected to experience substantial increases in traffic; though they are still projected to be below their estimated operating capacities.

Even though no roadways are projected to carry volumes that exceed their estimated operational capacities, the following nine road segments include intersections projected to exceed applicable LOS standards, which, in turn would affect overall operations along the roadway:

- (4) Richmond Beach Road: 8th Avenue NW to SR 99,
- (5) 8th Avenue NW/NW 180th Street/6th Avenue NW: Richmond Beach Road to N 175th Avenue,
- (8) Fremont Avenue N: N 185th Street to 244th Street SW,
- (10) Woodway Park Road: 238th Street SW to Algonquin Road,
- (11) 244th Street SW: 100th Avenue W to SR 99,
- (12) 8th Avenue NW: Richmond Beach Road to 244th Street SW,
- (14) 100th Avenue W: 244th Street SW to SR 104,
- (15) SR 99: 224th Street SW to N 185th Street, and
- (16) SR 99: N 175th Street to N 185th Street.



**Figure 3.11-4**  
**2025 No Action Roadway Level of Service**

As noted above under the No Action Alternative intersection analysis, the 2025 LOS results for the No Action Alternative reflect a conservative estimate of future roadway conditions, based on a build-out of regional land use projected by the County and PSRC. This programmatic SEIS seeks to assess the “worst case” cumulative conditions for the purpose of determining an order-of-magnitude effect of the proposed change in land use designation and zoning on the transportation system. Thus, the analysis assumes that historical mode split trends would continue into the future, resulting in a higher proportion of vehicle traffic.

However, planned transit enhancements on SR 99 and other demand-oriented strategies planned by the cities within the study area are likely to result in a future No Action vehicle demand that is lower than the levels reflected in this SEIS analysis. It is appropriate to reflect commitments to enhanced demand-oriented measures in future project-level analysis which, unlike programmatic analysis, can include mechanisms by which such commitments can be ensured.

### *Proposed Action*

Future traffic volumes at analysis intersections and on analysis roadway segments under the Proposed Action were forecasted using the County’s travel demand model, and reflect conditions expected to result under maximum allowable build-out under the proposed land use designation and zoning. The Proposed Action is described in detail in Chapter 2 of this Draft SEIS.

It is important to note that the Proposed Action analyzed in this document is the proposed change in land use designation and zoning; it is not the actual development that would be built on the site if the zoning change were approved. If the Proposed Action (proposed land use designation and zoning change) were to be approved, project-level environmental analysis will still be required for whatever actual development is proposed at the site. Because this is a programmatic analysis that evaluates impacts that could potentially occur as a result of the proposed land use designation and zoning change, transportation analysis conservatively focuses on the highest level of development, and thus the highest level of impact, that could reasonably be expected to occur under that proposed zoning designation. Thus, it is possible that future development under the Proposed Action could be less intense than what is evaluated in this Draft SEIS.

### Traffic Forecasts

The travel demand forecasting model (described under the No Action Alternative) was also developed to project future year traffic volumes within the study area under the Proposed Action. The technical report that documents the model development is provided in Appendix E of this Draft SEIS. Outside the Paramount site, all land use under the Proposed Action is the same that the land use identified under the No Action Alternative. Inside the Paramount site, land use and resulting trip generation projections reflect build-out of development that would be allowed under the proposed land use designation and zoning change.

### Land Use and Trip Generation

Traffic volumes for potential development under the proposed land use designation and zoning were estimated using standard average trip generation rates from the Trip Generation Manual (Institute of

Transportation Engineers 2003). Table 3.11-10 summarizes the trip generation rates that were used to analyze land use types that would be expected under the proposed land use designation and zoning.

Table 3.11-11 summarizes the mix of land use that was assumed under build-out under the proposed land use designation and zoning, and the projection of trips generated by those land uses. Trips were projected by applying the rates summarized in Table 3.11-10 to the land uses summarized in Table 3.11-11. Commercial development generally tends to result in higher trip generation than residential development, for the same geographical area. The proposed mixed use ~~zoning~~ in the docket proposal could reflect varying proportions of commercial to residential development. For this Draft SEIS analysis, a proportion of commercial development at the higher end of the potential range was conservatively assumed.

### Intersection Operations

The Proposed Action model output volumes were post-processed to project AM peak hour and PM peak hour traffic volumes at intersections. The projected AM peak hour and PM peak hour intersection traffic volumes are provided Tables B-6 and B-7, respectively, in Appendix C of this Draft SEIS.

Table 3.11-12 summarizes the percentage of volume increase over the No Action Alternative projected to result from the Proposed Action. Projections indicate that the proposal would increase traffic volumes by greater than 50% at the following intersections:

- (6) Algonquin Road and Woodway Park Road,
- (7) 238th Street SW and Woodway Park Road,
- (8) NW 196th Street and Richmond Beach Drive,
- (9) NW 196th Street and 20th Avenue NW,
- (10) NW 195th Street and 15th Avenue NW, and
- (11) Richmond Beach Road and 15th Avenue NW.

The first two intersections listed above are located in Woodway. Their relative increases are higher in part because of their proximity to the site, but also because the No Action Alternative volumes are relatively low. The other four intersections are those closest to the site, so it would be expected that the relative increases in volumes would be higher at these locations. Site generated traffic is expected to disperse, and result in smaller increases over the No Action Alternative, as it gets farther from the site.

**Table 3.11-12. Intersection Volume Increase by the Proposed Action**

Intersection	2025 AM Peak			2025 PM Peak		
	No Action (veh/hr)	Proposed Action (veh/hr)	Increase (%)	No Action (veh/hr)	Proposed Action (veh/hr)	Increase (%)
1 244th Street SW and SR 99	5,700	5,860	3	5,560	5,620	1
2 244th Street SW and Fremont Avenue N	1,585	1,740	10	1,510	1,610	7
3 Firdale Avenue N and 244th Street SW	1,125	1,310	16	1,100	1,195	9
4 244th Street SW and 100th Avenue W	985	1,265	28	1,150	1,675	46
5 SR 104 and 100th Avenue W	3,755	4,030	7	4,865	5,205	7
6 Algonquin Road and Woodway Park Road	405	625	54	570	720	26
7 238th Street SW and Woodway Park Road	350	575	64	415	565	36
8 NW 196th Street and Richmond Beach Drive	120	1,095	813	130	1,325	919
9 NW 196th Street and 20th Avenue NW	755	1,720	128	945	2,090	121
10 NW 195th Street and 15th Avenue NW	950	1,680	77	1,115	2,015	81
11 Richmond Beach Road and 15th Avenue NW	990	1,775	79	1,165	2,145	84
12 Richmond Beach Road and 8th Avenue NW	2,260	2,845	26	2,640	3,135	19
13 Richmond Beach Road and 3rd Avenue NW	2,260	2,350	4	2,305	2,435	6
14 Richmond Beach Road and Dayton Avenue N	2,205	2,310	5	2,180	2,300	6
15 N 185th Street and Fremont Avenue N	2,470	2,525	2	2,500	2,705	8
16 N 185th Street and SR 99	5,285	5,350	1	5,320	5,400	2
17 N 175th Street and 6th Avenue NW	930	965	4	985	1,045	6
18 St Luke Place N and Dayton Avenue N	1,255	1,280	2	1,050	1,135	8
19 N 175th Street and Fremont Avenue N	1,425	1,440	1	1,395	1,425	2
20 N 175th Street and SR 99	4,460	4,515	1	4,805	4,860	1
21 Carlyle Hall Road and Dayton Avenue N	1,480	1,505	2	1,230	1,265	3

Intersection	2025 AM Peak			2025 PM Peak		
	No Action (veh/hr)	Proposed Action (veh/hr)	Increase (%)	No Action (veh/hr)	Proposed Action (veh/hr)	Increase (%)
22 N Innis Arden Way and Greenwood Avenue N	1,355	1,390	3	1,075	1,095	2
23 N 160th Street and Greenwood Avenue N	1,450	1,475	2	1,185	1,220	3

veh/hr = intersection entering vehicles per hour

Table 3.11-13 summarizes projected 2025 intersection LOS under the Proposed Action (see also Figure 3.11-7). The intersection LOS analysis reports for 2025 Proposed Action conditions are provided in Appendix D of this Draft SEIS. The table shows that operations at the ten intersections projected to exceed LOS standards under the No Action Alternative are expected to degrade further under the Proposed Action.

The following four intersections projected to meet standards under the No Action Alternative are expected to exceed standards under the Proposed Action:

- (9) NW 196th Street and 20th Avenue NW,
- (10) NW 195th Street and 15th Avenue NW,
- (11) Richmond Beach Road and 15th Avenue NW, and
- (12) Richmond Beach Road and 8th Avenue NW.

All four intersections are located along NW 196th Street/NW 195th Street/Richmond Beach Road in Shoreline, which is the primary route between the Paramount site and SR 99.

**Table 3.11-13. Proposed Action Peak Hour Intersection Level of Service**

Intersection	Existing Traffic Control	AM Peak		PM Peak		LOS Standard	Jurisdiction
		LOS Average Delay (sec/veh)	Average Delay (sec/veh) LOS	LOS Average Delay (sec/veh)	Average Delay (sec/veh) LOS		
1 244th Street SW and SR 99	Signal	F	195	F	121	E/D (SR 99 HSS)	Shoreline/Edmonds/WSDOT
2 244th Street SW and Fremont Avenue N	Northbound Stop-Control	F	90	F	107	E	Shoreline
3 Firdale Avenue N and 244th Street SW	Northbound Stop-Control	D	28	C	15	D	Edmonds
4 244th Street SW and 100th Avenue W	Eastbound/Westbound	C/E	22/43	A/F	11/ECL	D	Edmonds

Intersection	Existing Traffic Control	AM Peak		PM Peak		LOS Standard	Jurisdiction
		LOS Average Delay (sec/veh)	Average Delay (sec/veh) OS	LOS Average Delay (sec/veh)	Average Delay (sec/veh) OS		
5 SR 104 and 100th Avenue W	Stop-Control Signal	F	95	F	166	D (SR 104 HSS)	Edmonds/ WSDOT
6 Algonquin Road and Woodway Park Road	Eastbound/ Westbound Stop-Control	B/B	14/13	A/C	0/18	A	Woodway
7 238th Street SW and Woodway Park Road	All-way Stop-Control	A	10	A	10	A	Woodway
8 NW 196th Street and Richmond Beach Drive	Westbound Stop-Control	B	15	C	23	E	Shoreline
9 NW 196th Street and 20th Avenue NW	All-way Stop-Control	E	44	F	68	E	Shoreline
10 NW 195th Street and 15th Avenue NW	Northbound/ Southbound Stop-Control	E/F	29/105	B/F	11/278	E	Shoreline
11 Richmond Beach Road and 15th Avenue NW	All-way Stop-Control	D	33	F	83	E	Shoreline
12 Richmond Beach Road and 8th Avenue NW	Signal	F	111	F	167	E	Shoreline
13 Richmond Beach Road and 3rd Avenue NW	Signal	C	26	B	10	E	Shoreline
14 Richmond Beach Road and Dayton Avenue N	Signal	B	16	B	12	E	Shoreline
15 N 185th Street and Fremont Avenue N	Signal	D	36	D	36	E	Shoreline
16 N 185th Street and SR 99	Signal	F	<del>199</del> 96	F	<del>204</del> 106	E (SR 99 HSS)	Shoreline/ WSDOT
17 N 175th Street and 6th Avenue NW	Southbound Stop-Control	F	70	C	18	E	Shoreline
18 St Luke Place N and Dayton Avenue N	Eastbound Stop-Control	D	27	C	15	E	Shoreline
19 N 175th Street and Fremont Avenue N	Signal	B	11	A	8	E	Shoreline
20 N 175th Street and SR 99	Signal	<del>F</del> D	<del>83</del> 53	<del>F</del> E	<del>97</del> 64	E (SR 99 HSS)	Shoreline/ WSDOT
21 Carlyle Hall Road and Dayton Avenue N	All-way Stop-Control	F	113	F	55	E	Shoreline
22 N Innis Arden Way and	Eastbound	C	21	B	13	E	Shoreline

Intersection	Existing Traffic Control	AM Peak		PM Peak		LOS Standard	Jurisdiction
		LOS Average Delay (sec/veh)	Average Delay (sec/veh) ECL	LOS Average Delay (sec/veh)	Average Delay (sec/veh) ECL		
23 Greenwood Avenue N N 160th Street and Greenwood Avenue N	Stop-Control  All-way Stop-Control	F	65	D	29	E	Shoreline

ECL = Exceeds calculable limits; HSS = Highway of Statewide Significance

### Roadway Segment Operations

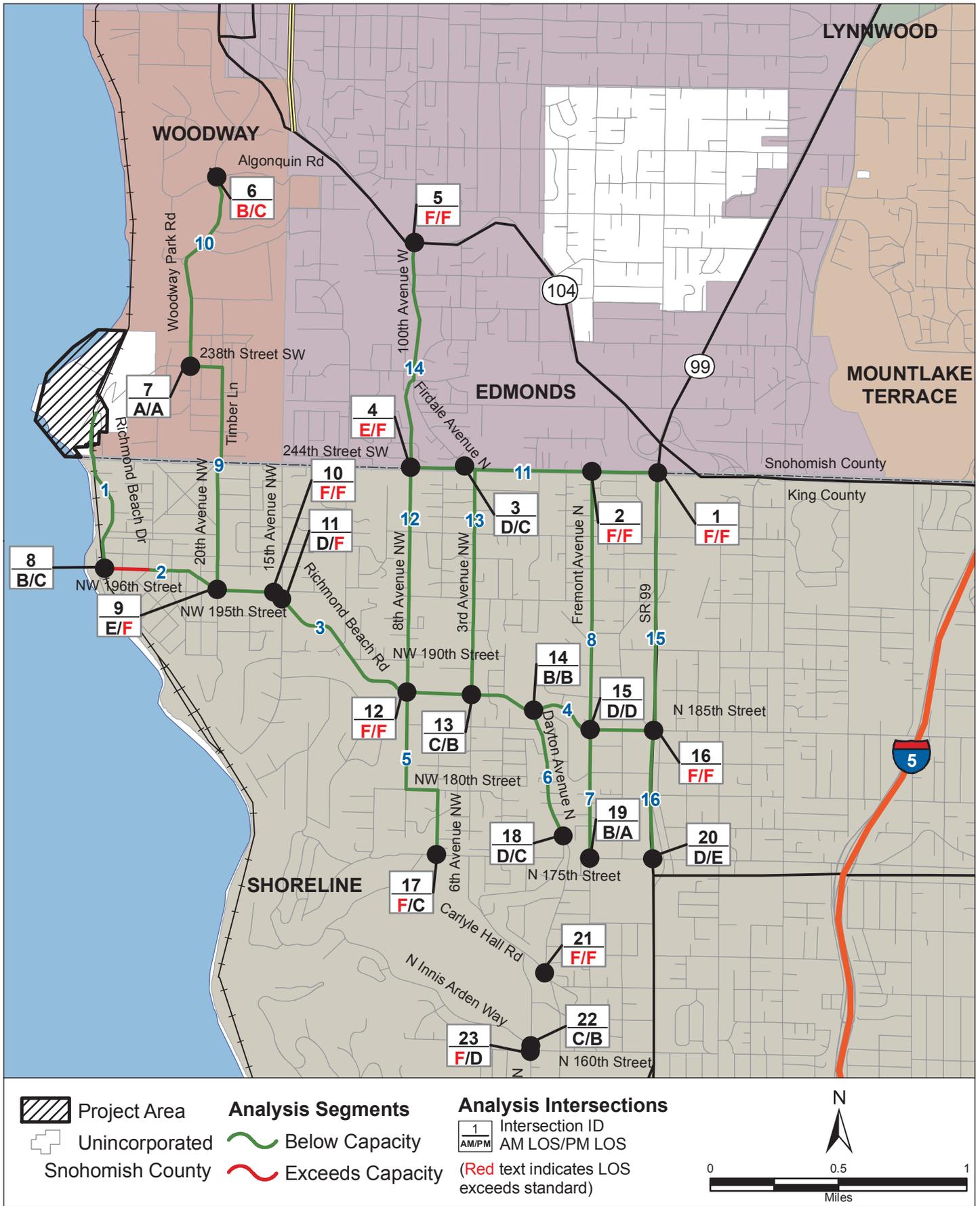
Table 3.11-14 summarizes projected operating conditions of the analysis roadway segments under the No Action Alternative (see also Figure 3.11-7). The table summarizes the projected percentage of volume difference under the Proposed Action, compared to the No Action Alternative. In most cases, the Proposed Action is expected to result in increases in traffic; but in some cases, minor decreases are projected. This is because the model analyzes network-wide affects of traffic patterns; and in some cases, the overall affect of the new site-generated traffic could be a shift in the paths taken by other traffic unrelated to the site.

Projections indicate that the Proposed Action would increase traffic volumes on the following roadway segments by greater than 50 percent as compared to the peak hour volumes under the No Action Alternative:

- (1) Richmond Beach Drive: Woodway City Limits to NW 196th Street (AM and PM peak hours)
- (2) NW 196th Street: Richmond Beach Drive to NW 20th Avenue (AM and PM peak hours)
- (3) NW 195th Street/Richmond Beach Road: 20th Avenue NW to 8th Avenue NW (AM and PM peak hours)
- (10) Woodway Park Road: 238th Street SW to Algonquin Road (AM peak hour)

Woodway Park Road (segment 10) is located in Woodway. The higher relative increase on this segment is due in part to its proximity to the site, but also because the No Action Alternative volumes on this roadway segment are relatively low. The other analysis segments are those closest to the site, so it would be expected that the relative increases in volumes would be higher at these locations. Site-generated traffic is expected to disperse, and result in smaller increases over the No Action Alternative, as it gets farther from the site.

Table 3.11-14 shows that site-generated PM peak hour volumes are projected to exceed operational capacity on segment (1) Richmond Beach Road, and segment (2) the two-lane portion of NW 196th Street (west of NW 24th Avenue) under Proposed Action conditions.



**Figure 3.11-7**  
**2025 Proposed Action Roadway Level of Service**

**Table 3.11-14. Segment Volume Increase by the Proposed Action**

Roadway Segment	Estimated Operating Capacity <sup>1</sup>	AM Peak Hour			PM Peak Hour		
		No Action (veh/hr)	Proposed Action (veh/hr)	% Increase	No Action (veh/hr)	Proposed Action (veh/hr)	% Increase
1 Richmond Beach Drive: Woodway City Limits to NW 196th Street	1,300	110	1,085	886%	115	1,310	1039%
2 NW 196th Street: Richmond Beach Drive to NW 20th Avenue	1,500	295	1,270	331%	400	1,590	298%
3 NW 195th Street/Richmond Beach Road: 20th Avenues NW to 8th Avenue NW	3,400	785	1,640	109%	1,060	1,960	85%
4 Richmond Beach Road: 8th Avenue NW to SR 99	3,400	1,360	1,975	45%	1,980	2,150	9%
5 8th Avenue NW/NW 180th Street/6th Avenue NW: Richmond Beach Road to N 175th Avenue	1,500	820	855	4%	940	935	-1%
6 Dayton Avenue N: Richmond Beach Road to N 175th Street/Saint Luke Place	1,700	855	865	1%	730	800	10%
7 Fremont Avenue N: N 175th Street to N 185th Street	1,500	880	895	2%	885	955	8%
8 Fremont Avenue N: N 185th Street to 244th Street SW	1,500	830	795	-4%	1,075	1,085	1%
9 20th Street NW/Timber Lane/238th Street SW: NW 196th Street to Woodway Park Road	1,300	370	550	49%	460	590	28%
10 Woodway Park Road: 238th Street SW to Algonquin Road	1,300	330	555	68%	400	550	38%
11 244th Street SW: 100th Avenue W to SR 99	1,700	1,415	1,550	10%	1,335	1,425	7%
12 8th Avenue NW: Richmond Beach Road to 244th Street SW	1,700	1,025	1,235	20%	1,120	1,645	47%
13 3rd Avenue NW : Richmond Beach Road to 244th Street SW	1,500	1,040	1,060	2%	695	705	1%
14 100th Avenue W: 244th Street SW to SR 104	1,700	820	920	12%	960	1,400	46%

Roadway Segment	Estimated Operating Capacity <sup>1</sup>	AM Peak Hour			PM Peak Hour		
		No Action (veh/hr)	Proposed Action (veh/hr)	% Increase	No Action (veh/hr)	Proposed Action (veh/hr)	% Increase
15 SR 99: 224th Street SW to N 185th Street	4,200	4,175	4,200	1%	3,730	3,700	-1%
16 SR 99: N 175th Street to N 185th Street	4,200	3,285	3,285	0%	3,720	3,700	-1%

<sup>1</sup> Operating capacity is a planning level estimate, based on the roadway functional classification and width. This value was estimated by applying the per lane planning-level capacities presented in Table 3.11-1.

Table 3.11-15 identifies which of the analysis road segments include one or more intersections that are projected to exceed adopted LOS standards under the Proposed Action. In addition to the nine road segments identified under the No Action Alternative that include intersections projected to exceed standards, the following three segments include intersections that exceed standards under the Proposed Action:

- NW 196th Street: Richmond Beach Drive to NW 20th Avenue,
- NW 195th Street/Richmond Beach Road: 20th Avenues NW to 8th Avenue NW, and
- 20th Street NW/Timber Lane/238th Street SW: NW 196th Street to Woodway Park Road.

**Table 3.11-15. Proposed Action Roadway Segment Operations**

Roadway Segment	Includes Intersection(s) that Exceed LOS Standard	Jurisdiction
1 Richmond Beach Drive: Woodway City Limits to NW 196th Street	No	Shoreline/ Woodway
2 NW 196th Street: Richmond Beach Drive to NW 20th Avenue	Yes	Shoreline
3 NW 195th Street/Richmond Beach Road: 20th Avenues NW to 8th Avenue NW	Yes	Shoreline
4 Richmond Beach Road: 8th Avenue NW to SR 99	Yes	Shoreline
5 8th Avenue NW/NW 180th Street/6th Avenue NW: Richmond Beach Road to N 175th Avenue	Yes	Shoreline
6 Dayton Avenue N: Richmond Beach Road to N 175th Street/Saint Luke Place	No	Shoreline
7 Fremont Avenue N: N 175th Street to N 185th Street	No	Shoreline
8 Fremont Avenue N: N 185th Street to 244th Street SW	Yes	Shoreline
9 20th Street NW/Timber Lane/238th Street SW: NW 196th Street to Woodway Park Road	Yes	Shoreline/ Woodway
10 Woodway Park Road: 238th Street SW to Algonquin Road	Yes	Woodway
11 244th Street SW: 100th Avenue W to SR 99	Yes	Shoreline/ Edmonds

Roadway Segment	Includes Intersection(s) that Exceed LOS Standard	Jurisdiction
12 8th Avenue NW: Richmond Beach Road to 244th Street SW	Yes	Shoreline
13 3rd Avenue NW : Richmond Beach Road to 244th Street SW	No	Shoreline
14 100th Avenue W: 244th Street SW to SR 104	Yes	Edmonds
15 SR 99: 224th Street SW to N 185th Street	Yes	Shoreline/ WSDOT
16 SR 99: N 175th Street to N 185th Street	Yes	Shoreline/ WSDOT

An increase in traffic volumes at intersections and roadway sections under the Proposed Action also increases the potential for collisions, because of the higher number of potential conflicts associated with vehicles. In particular, the section of Richmond Beach Drive between 15th Avenue and 3rd Avenue would need to be monitored closely, as it already experiences high collision rates and would see a significant increase of traffic volumes as a result of the implementation of the Proposed Action.

The overall projected effect of the Proposed Action on traffic circulation is summarized as follows:

- As Richmond Beach Drive would provide the only access into and out of the site, all projected trips would travel on this roadway, so volumes are expected to increase substantially. Projections indicate that 2025 PM peak-hour volumes would slightly exceed the operational capacity of the roadway. The northern portion of the Richmond Beach Drive segment is not currently built to collector standards. It has narrow lanes and intermittent shoulders of varying width. This is sufficient for its current use, which is to carry the low number of vehicles generated by the existing industrial use of the site. The southern portion of the segment is wider, but is also built to rural standards with shoulders instead of sidewalks. Under the proposed land use, this roadway would carry a much higher traffic volume, and would also serve as the route for pedestrian and bicycle traffic in and out the site. In order to safely accommodate the expected mix of vehicular and non-motorized traffic under the Proposed Action, Richmond Beach Drive should be improved to urban collector standards with minimum 11-foot travel lanes and a separate pedestrian path.
- The travel model indicates that the majority of traffic generated under the Proposed Action is expected to travel NW 196th Street/NW 195th Street/Richmond Beach Road/N 185th Street. This is the most direct path between the site and SR 99, which provides the most direct access to the regional roadway system.
- ~~A moderate amount of p~~Project-generated traffic is also expected to travel on the primary north-south roads between Richmond Beach Road and SR 104. Increases are expected to occur along the 20th Avenue N/Timber Lane/Woodway Park Road corridor, but the total resulting volumes are not expected to be very high. Impacts are identified along this roadway because they exceed the adopted Woodway standard of LOS A. However, the worst LOS projected to result

under 2025 Proposed Action is LOS B. Moderate increases in traffic volumes are also expected along the 8th Avenue NW/100th Avenue W corridor.

- Model projections indicate that increased congestion at the intersection of Richmond Beach Road and 8th Avenue NW expected under the Proposed Action would cause travelers to attempt to bypass that intersection by cutting through NW 190th Street, which connects the two roadways on block north of their intersection. NW 190th Street is a local access street that is not intended to carry through-traffic. It is possible that this could also occur to a lesser degree under the No Action Alternative. However, the Proposed Action is projected to add 500 to 600 additional vehicles to this intersection during each of the peak hours. The projected increase in traffic under the Proposed Action would be expected to increase the potential for cut-through traffic on NW 190th Street, and thus is considered a potential impact.
- No other major paths are projected for traffic generated under the Proposed Action, although localized increases in traffic have been projected at other analysis locations.

### 3.11.3. Mitigation Measures

#### *Roadway Improvement Projects*

Roadway improvement projects have been identified at any location at which a potential significant impact on roadway operations has been identified. If improvement projects recommended under the No Action Alternative were not found to be sufficient to accommodate projected future demand identified under Proposed Action, additional mitigation measures have been identified as needed. Capacity mitigation projects include changes in traffic controls (such as upgrade from stop control to a traffic signal) or increases to the capacity of an intersection or roadway segment; and may involve multiple jurisdictions. Some of the mitigation measures identified to address capacity issues would also improve safety conditions. However, additional safety mitigation measures might be required to address potential safety issues resulting from higher traffic volumes on roadway sections and intersections, such as Richmond Beach Road. Safety improvements are likely to involve traffic calming devices such as improved signing, bulb-outs, speed humps, medians, or traffic circles.

Table 3.11-16 summarizes the improvements that have been identified to mitigate impacts under the Proposed Action and No Action Alternative (see also Figure 3.11-8).

Note, as this is a programmatic assessment, ~~these measures~~ the projects listed in Table 3.11-16 are intended to provide a conservative order-of-magnitude estimate of the level of mitigation that ~~would~~ could be needed under full build-out of development that would be allowed under the Proposed Action and No Action Alternative. These measures were developed for the purpose of illustration, and do not represent commitments by the affected jurisdictions or by the applicant.

Also, as described earlier in this chapter, the No Action Alternative travel demand assumptions were conservative, to allow a conservative assessment of potential cumulative impacts under the Proposed Action. Future vehicle volumes under the No Action Alternative may end up being lower than those reflected in this SEIS analysis, due to regional and local transit enhancements and other demand-oriented strategies. In this case, it is possible that (1) the need for some mitigation measures

may not be triggered due to cumulative conditions being lower than what was programmatically evaluated; or (2) some mitigation measures identified under No Action Alternative may alternatively be triggered by the Proposed Action.

It is expected that if the proposed land use designation and zoning were approved, subsequent project-level environmental analysis would include detailed analysis to identify recommended improvements needed to support the actual development proposal, and could include demand-oriented measures as well as capacity improvements. It would also include more detailed analysis to determine the appropriate agency and applicant commitments to future transportation improvements, based on the actual proposed development levels and phasing, and provide implementing mechanisms to ensure those commitments.

**Table 3.11-16. Recommended Mitigation for the Proposed Action and No Action Alternative**

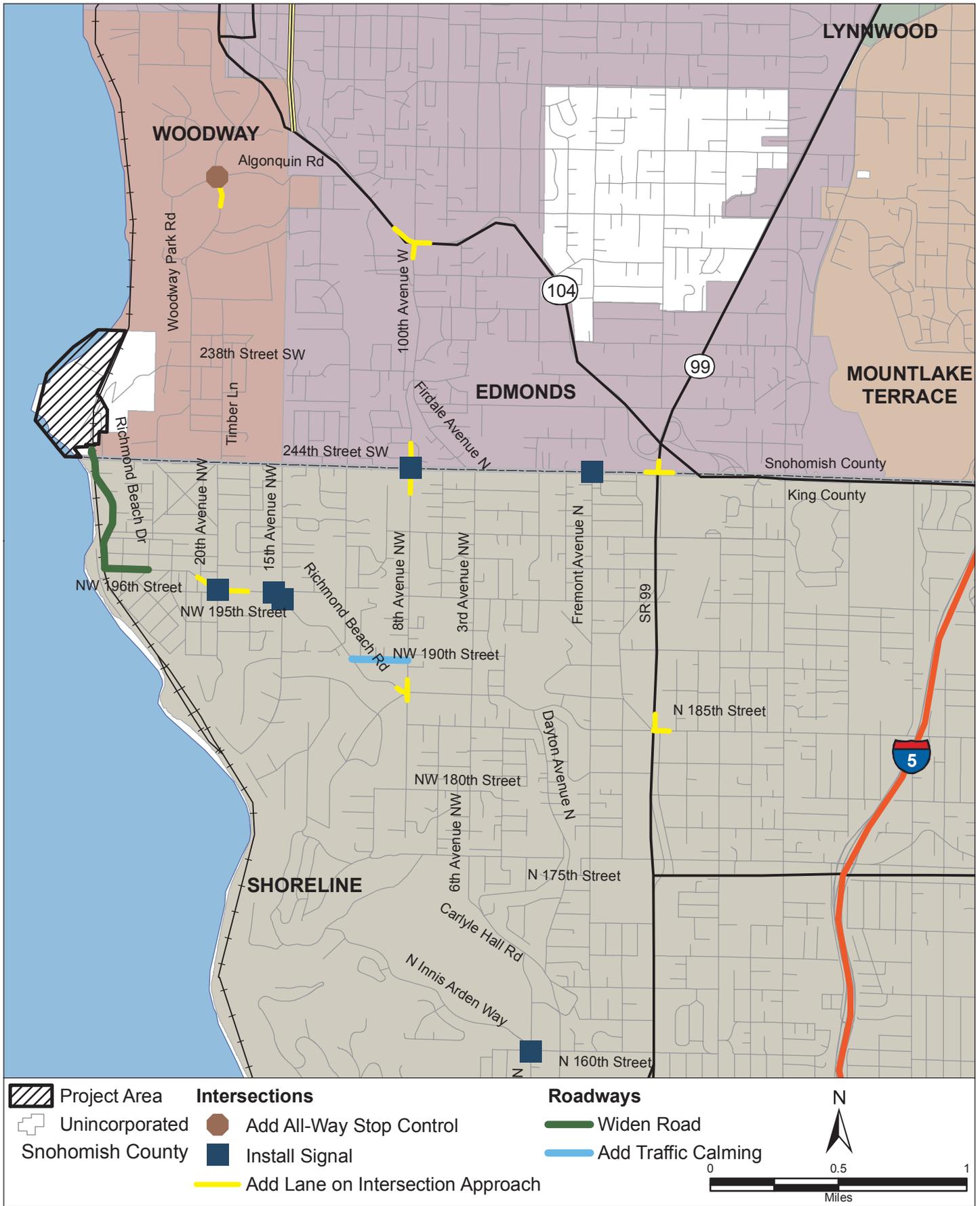
Location	Jurisdiction	Proposed Action	No Action Alternative <sup>1</sup>
<b>Intersections</b>			
1 244th Street SW and SR 99	Shoreline/ Edmonds/ WSDOT	No Action Alternative improvement would also address Proposed Action impacts.	Restripe northbound right-turn lane to through-right lane. Add a southbound through lane, a southbound right-turn lane, a 2nd eastbound left-turn lane, and a westbound right-turn lane.
2 244th Street SW and Fremont Avenue N	Shoreline	No Action Alternative improvement would also address Proposed Action impacts.	Install a signal.
4 244th Street SW and 100th Avenue W	Edmonds	No Action Alternative improvement plus Install a signal.	Install all-way stop-control. Add northbound and southbound through lanes.
5 SR 104 and 100th Avenue W	Edmonds/ WSDOT	No Action Alternative improvement plus add a westbound right-turn lane.	Add a northbound through lane, an eastbound right-turn lane, and a 2nd westbound left-turn lane.
6 Algonquin Road and Woodway Park Road	Woodway	No Action Alternative improvement plus add a northbound through lane.	Install all-way stop control.
9 NW 196th Street and 20th Avenue NW	Shoreline	Install a signal and add eastbound and westbound left-turn lanes.	---
10 NW 195th Street and 15th Avenue NW	Shoreline	Install a signal and coordinate with intersection below.	---
11 Richmond Beach Road and 15th Avenue NW	Shoreline	Install a signal and coordinate with intersection above.	---
12 Richmond Beach Road and 8th Avenue NW	Shoreline	Add a southbound right-turn lane, a 2nd eastbound left-turn lane, and northbound right-turn lane.	---
16 N 185th Street and SR 99	Shoreline/	No Action Alternative	Add eastbound and westbound

Location	Jurisdiction	Proposed Action	No Action Alternative <sup>1</sup>
	WSDOT	improvement plus add a westbound right-turn lane.	<del>left turn lanes, an eastbound right turn lane, and a 2nd southbound left-turn lane. Change signal phasing to provide protected left turn phases for eastbound and westbound approaches.</del>
17 N 175th Street and 6th Avenue NW	Shoreline	No Action Alternative improvement would also address Proposed Action impacts.	Install a signal.
20 N 175th Street and SR 99	Shoreline/ WSDOT	<del>No Action Alternative improvement would also address Proposed Action impacts.</del>	<del>Add a 2nd westbound left turn lane. Change signal phasing to provide protected left turn phases for eastbound and westbound approaches.</del>
21 Carlyle Hall Road and Dayton Avenue N	Shoreline	No Action Alternative improvement would also address Proposed Action impacts.	Install a signal.
23 N 160th Street and Greenwood Avenue N	Shoreline	No Action Alternative improvement would also address Proposed Action impacts.	Install a signal.

**Roadway Segments**

1	Richmond Beach Drive, between the site and the Woodway/Shoreline city limits (~2,600 feet)	Shoreline/ Woodway	Widen to urban collector standards with 11-foot lanes and separate pedestrian pathway.	---
2	NW 196th Street, between Richmond Beach Drive and 24th Avenue NW (~900 feet)	Shoreline	Widen from two lanes to four lanes	---
	NW 190th Street, between NW Richmond Beach Road and 8th Avenue NW (~1,100 feet)	Shoreline	Install traffic calming devices	---

1. No Action Alternative travel demand assumptions were conservative, to allow a conservative assessment of potential cumulative impacts under the Proposed Action. Future vehicle volumes under the No Action Alternative may end up being lower than those reflected in this SEIS analysis, due to regional and local transit enhancements and other demand-oriented strategies. In this case, it is possible that (1) the need for some mitigation measures may not be triggered due to cumulative conditions being lower than what was programmatically evaluated; or (2) some mitigation measures identified under the No Action Alternative may alternatively be triggered by the Proposed Action. Subsequent project-level analysis would be needed to determine the appropriate agency and applicant commitments to future transportation improvements, based on the actual proposed development levels and phasing, and to provide implementing mechanisms for ensuring those commitments.



Tables 3.11-17 and 3.11-18 summarize the intersection LOS projected with the identified capacity improvement projects in place, for the Proposed Action and the No Action Alternative, respectively. The tables show that the recommended measures are expected to fully mitigate identified impacts so that all analysis intersections would potentially operate within the adopted standards of the local jurisdictions. Figure 3.11-89 shows 2025 peak hour LOS for analysis intersections with mitigation in place under the Proposed Action.

**Table 3.11-17. Proposed Action Peak Hour Intersection Level of Service–Mitigated**

Intersection	Traffic Control	AM Peak		PM Peak		LOS Standard	Jurisdiction
		<u>LOS</u> <u>Average</u> <u>Delay</u> <u>(sec/veh)</u>	<u>Average</u> <u>Delay</u> <u>(sec/veh)</u> LOS	<u>LOS</u> <u>Average</u> <u>Delay</u> <u>(sec/veh)</u>	<u>Average</u> <u>Delay</u> <u>(sec/veh)</u> LOS		
1 244th Street SW and SR 99	Signal	E	73	D	50	E/D (SR 99 HSS)	Shoreline/ Edmonds/ WSDOT
2 244th Street SW and Fremont Avenue N	Signal	B	16	B	10	E	Shoreline
3 Firdale Avenue N and 244th Street SW	Northbound Stop-Control	D	28	C	15	D	Edmonds
4 244th Street SW and 100th Avenue W	Signal	A	5	A	8	D	Edmonds
5 SR 104 and 100th Avenue W	Signal	D	47	D	53	D (SR 104 HSS)	Edmonds/ WSDOT
6 Algonquin Road and Woodway Park Road	All-Way Stop-Control	A	9	A	10	A	Woodway
7 238th Street SW and Woodway Park Road	All-way Stop-Control	A	10	A	A	A	Woodway
8 NW 196th Street and Richmond Beach Drive	Westbound Stop-Control	B	15	C	23	E	Shoreline
9 NW 196th Street and 20th Avenue NW	Signal	A	10	C	20	E	Shoreline
10 NW 195th Street and 15th Avenue NW	Signal	A	10	B	11	E	Shoreline
11 Richmond Beach Road and 15th Avenue NW	Signal	A	7	A	9	E	Shoreline
12 Richmond Beach Road and 8th Avenue NW	Signal	D	51	D	53	E	Shoreline
13 Richmond Beach Road and 3rd Avenue NW	Signal	C	26	B	10	E	Shoreline
14 Richmond Beach Road and Dayton Avenue N	Signal	B	16	B	12	E	Shoreline

Intersection	Traffic Control	AM Peak		PM Peak		LOS Standard	Jurisdiction
		<u>LOS Average Delay (sec/veh)</u>	<u>Average Delay (sec/veh) LOS</u>	<u>LOS Average Delay (sec/veh)</u>	<u>Average Delay (sec/veh) LOS</u>		
15 N 185th Street and Fremont Avenue N	Signal	D	36	D	36	E	Shoreline
16 N 185th Street and SR 99	Signal	E	<del>69</del> 62	E	<del>74</del> 77	E (SR 99 HSS)	Shoreline/WSDOT
17 N 175th Street and 6th Avenue NW	Signal	A	8	A	8	E	Shoreline
18 St Luke Place N and Dayton Avenue N	Eastbound Stop-Control	D	27	C	15	E	Shoreline
19 N 175th Street and Fremont Avenue N	Signal	B	11	A	8	E	Shoreline
20 N 175th Street and SR 99	Signal	D	53	E	<del>78</del> 64	E (SR 99 HSS)	Shoreline/WSDOT
21 Carlyle Hall Road and Dayton Avenue N	Signal	B	11	A	8	E	Shoreline
22 N Innis Arden Way and Greenwood Avenue N	Eastbound Stop-Control	D	32	C	16	E	Shoreline
23 N 160th Street and Greenwood Avenue N	Signal	C	25	C	24	E	Shoreline

HSS = Highway Statewide of Significance

**Table 3.11-18. No Action Alternative Peak Hour Intersection Level of Service-Mitigated**

Intersection	Traffic Control	AM Peak		PM Peak		LOS Standard	Jurisdiction
		<u>LOS Average Delay (sec/veh)</u>	<u>Average Delay (sec/veh) LOS</u>	<u>LOS Average Delay (sec/veh)</u>	<u>Average Delay (sec/veh) LOS</u>		
1 244th Street SW and SR 99	Signal	D	54	D	50	E/D (SR 99 HSS)	Shoreline/Edmonds/WSDOT
2 244th Street SW and Fremont Avenue N	Signal	A	10	A	9	E	Shoreline
3 Firdale Avenue N and 244th Street SW	Northbound Stop-Control	C	18	B	14	D	Edmonds
4 244th Street SW and 100th Avenue W	All-Way Stop-Control	B	11	C	15	D	Edmonds

	Intersection	Traffic Control	AM Peak		PM Peak		LOS Standard	Jurisdiction
			<u>LOS</u> <u>Average</u> <u>Delay</u> <u>(sec/veh)</u>	<u>Average</u> <u>Delay</u> <u>(sec/veh)</u> <u>LOS</u>	<u>LOS</u> <u>Average</u> <u>Delay</u> <u>(sec/veh)</u>	<u>Average</u> <u>Delay</u> <u>(sec/veh)</u> <u>LOS</u>		
5	SR 104 and 100th Avenue W	Signal	D	40	D	53	D (SR 104 HSS)	Edmonds/ WSDOT
6	Algonquin Road and Woodway Park Road	All-Way Stop-Control	A	8	A	10	A	Woodway
7	238th Street SW and Woodway Park Road	All-way Stop-Control	A	8	A	9	A	Woodway
8	NW 196th Street and Richmond Beach Drive	Westbound Stop-Control	A	9	A	9	E	Shoreline
9	NW 196th Street and 20th Avenue NW	All-way Stop-Control	B	10	B	11	E	Shoreline
10	NW 195th Street and 15th Avenue NW	Northbound/ Southbound Stop-Control	B/C	14/19	A/D	10/26	E	Shoreline
11	Richmond Beach Road and 15th Avenue NW	All-way Stop-Control	B	10	B	12	E	Shoreline
12	Richmond Beach Road and 8th Avenue NW	Signal	E	65	E	62	E	Shoreline
13	Richmond Beach Road and 3rd Avenue NW	Signal	C	27	A	10	E	Shoreline
14	Richmond Beach Road and Dayton Avenue N	Signal	B	15	B	12	E	Shoreline
15	N 185th Street and Fremont Avenue N	Signal	C	33	D	36	E	Shoreline
16	N 185th Street and SR 99	Signal	<del>E</del> <u>D</u>	<del>59</del> <u>49</u>	E	<del>80</del> <u>79</u>	E (SR 99 HSS)	Shoreline/ WSDOT
17	N 175th Street and 6th Avenue NW	Signal	A	8	A	8	E	Shoreline
18	St Luke Place N and Dayton Avenue N	Eastbound Stop-Control	C	24	B	14	E	Shoreline
19	N 175th Street and Fremont Avenue N	Signal	B	12	A	8	E	Shoreline
20	N 175th Street and SR 99	Signal	D	<del>50</del> <u>49</u>	E	<del>75</del> <u>56</u>	E (SR 99 HSS)	Shoreline/ WSDOT
21	Carlyle Hall Road and Dayton Avenue N	Signal	B	11	A	8	E	Shoreline
22	N Innis Arden Way and Greenwood Avenue N	Eastbound Stop-Control	D	28	B	15	E	Shoreline

Intersection	Traffic Control	AM Peak		PM Peak		LOS Standard	Jurisdiction
		LOS Average Delay (sec/veh)	Average Delay (sec/veh) LOS	LOS Average Delay (sec/veh)	Average Delay (sec/veh) LOS		
23 N 160th Street and Greenwood Avenue N	Signal	C	25	C	23	E	Shoreline

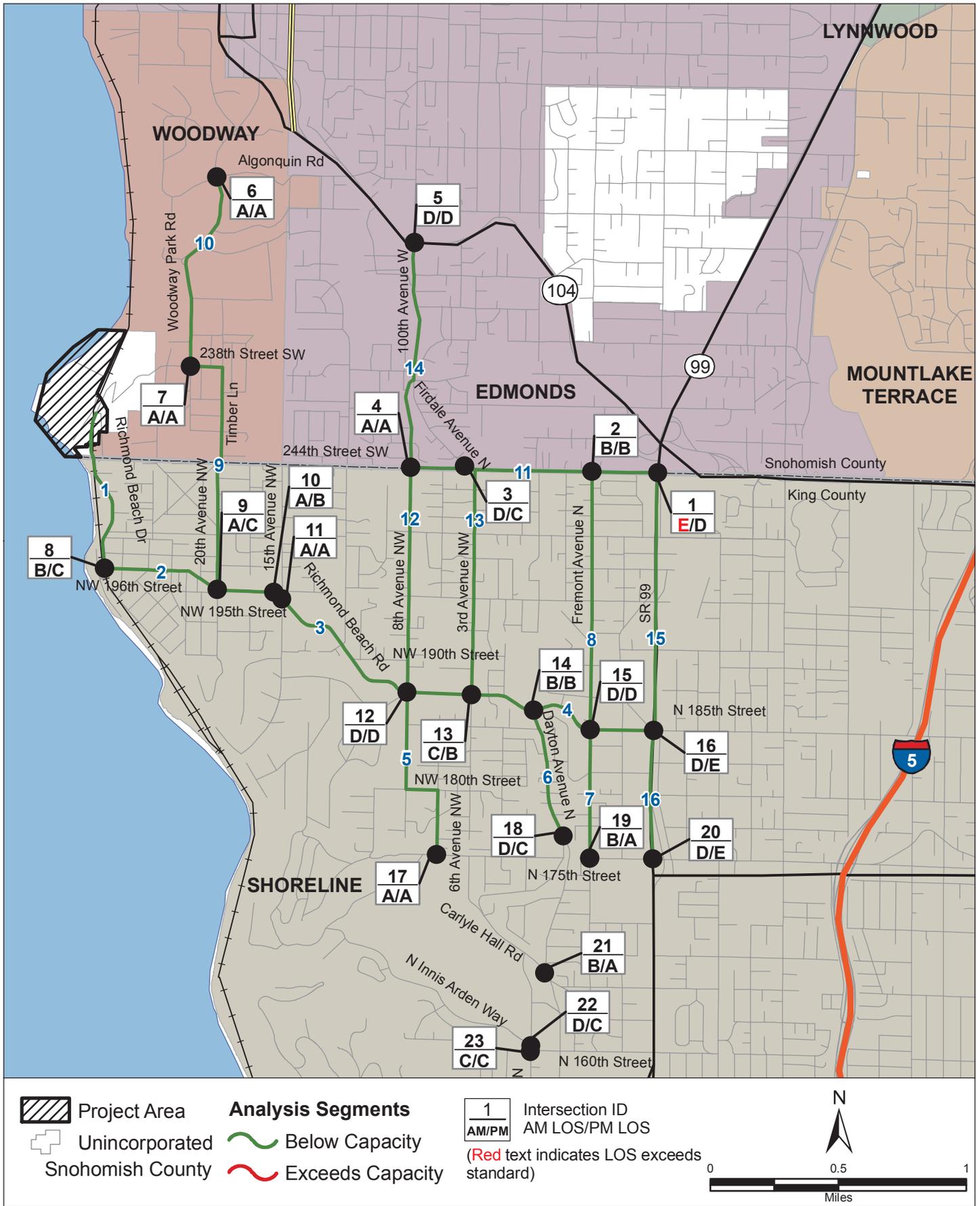
HSS = Highway of Statewide Significance

### *Other Potential Mitigation Considered*

#### **Additional Transit at Site**

It is possible that future enhanced transit service between the site and other regional destinations could reduce some of the additional capacity needed as a result of additional development at the Paramount site. As discussed earlier in this section, build-out of mixed use development under the proposed land use designation and zoning would be expected to provide adequate density to support transit service at the site. Reduction in regional trips as a result of mixed use on the site was included in the analysis assumptions under the Proposed Action. However, the location and characteristics of the site do not provide any basis for assuming that the share of transit demand to regional destinations would be any greater than is typical. Any commitment to enhanced demand-oriented measures is not appropriate at a programmatic level of analysis, because there is no mechanism by which to tie such commitments to approval of the Proposed Action, which is simply the zoning land use designation and change (and not the actual development, which would be covered by subsequent project-level analysis). Thus, assumption of transit share greater than what is already implicit in the ITE trip generation assumptions was not considered to be reasonable at this programmatic level.

Also, while commuter rail runs directly through the site, construction of a train station to allow direct rail service at the site was not considered reasonable in the foreseeable future. Sound Transit proposed a “provisional” station at Point Wells, including up to 120 surface parking stalls, as part of Sound Move. A station was estimated to cost approximately \$60 million (Sound Transit 2005). However, this provisional station was not carried into the Sound Transit 2 (ST2) Plan, which is the voter-approved program of Sound Transit improvements through 2023 (Sound Transit 2009). Thus, based on existing adopted plan, Sound Transit has not indicated any plan to build a station at this location; and if a station were to be considered, a detailed feasibility study would need to be implemented that would assess not only if the site had adequate demand to justify rail, but also study the implications of additional demand to the area that would be expected to result. For these reasons, train service at the Paramount site was not considered to be feasible mitigation at the programmatic level within the 2025 time frame evaluated in this SEIS.



**Figure 3.11-9**  
**2025 Proposed Action Roadway Level of Service - Mitigated**

### *Planning-Level Cost of Capacity Improvements*

Under the GMA, local jurisdictions can require the new development to pay the costs of improvements that are triggered by that development, as a condition of development approval. Table 3.11-19 presents planning-level cost estimates that were developed for the capacity mitigation projects. The costs presented for the Proposed Action are in addition to the costs identified under the No Action Alternative. The assumptions and calculations for these cost estimates are provided in Appendix F of ~~this~~ the Draft SEIS. It should be noted that these estimates are very broad, and are intended to provide a conservative order-of-magnitude estimate of the cost of potential improvements.

As discussed earlier in this chapter, the roadway mitigation measures were developed for the purpose of illustration, and do not represent commitments by the affected jurisdictions or by the applicant. Also, future vehicle volumes under the No Action Alternative may end up being lower than those reflected in this SEIS analysis, due to regional and local transit enhancements and other demand-oriented strategies. In this case, it is possible that (1) the need for some mitigation measures may not be triggered due to cumulative conditions being lower than what was programmatically evaluated; or (2) some mitigation measures identified under the No Action Alternative may alternatively be triggered by the Proposed Action.

Because this is a non-project action, the intent is to provide an order-of-magnitude assessment of potential impacts and mitigation. If the proposed land use designation and zoning were approved, a site-specific development proposal would still need to be provided, which would be subject to detailed project-level environmental analysis. Project-level analysis would include a more detailed assessment of potential impacts based on the actual development proposal, more detailed cost estimates of recommended improvements, the commitments of the applicant and local jurisdictions to fund future improvements, as well as any needed caps on development levels to ensure the balance between travel demand and infrastructure. Mechanisms would also be defined by which to ensure that the needed mitigation is implemented. It is expected that the County, applicant, and local jurisdictions would work closely together to determine the appropriate level of development, level of improvement needed to address impacts of a development proposal, and commitments required by all involved parties.

~~It is expected that if the proposed zoning were approved, subsequent project-level environmental analysis would include more detailed cost estimates of recommended improvements.~~ As part of a project-level assessment, new development may be required to contribute to the cost of improvements in proportion to its contribution of vehicle trips to the deficiencies being mitigated. In addition, at the project level, if additional demand-oriented measures were developed as an alternative to some of the capacity improvement, construction of infrastructure and/or provision of services needed to implement them could be identified as a condition of development approval.

**Table 3.11-19. Cost Estimates for Recommended Mitigation Projects**

Location/Jurisdiction	Proposed Action Alternative Project Costs <sup>1,2</sup>	No Action Alternative Project Costs <sup>1,3</sup>
<b>Shoreline</b>		
244th Street SW and Fremont Avenue N	---	\$580,000
NW 196th Street and 20th Avenue NW	\$2,030,000	---
NW 195th Street and 15th Avenue NW	\$580,000	---
Richmond Beach Road and 15th Avenue NW	\$580,000	---
Richmond Beach Road and 8th Avenue NW	\$2,087,500	---
N 175th Street and 6th Avenue NW	---	\$580,000
Carlyle Hall Road and Dayton Avenue N	---	\$580,000
N 160th Street and Greenwood Avenue N	---	\$580,000
NW 196th Street, between Richmond Beach Drive and 24th Avenue NW	\$2,035,000	---
NW 190th Street, between NW Richmond Beach Road and 8th Avenue NW	\$100,000	---
<b>Edmonds</b>		
244th Street SW and 100th Avenue W	\$580,000	\$3,605,000
<b>Woodway</b>		
Algonquin Road and Woodway Park Road	\$1,800,000	\$5,000
<b>Shoreline and WSDOT</b>		
N 185th Street and SR 99	\$500,000	<del>\$2,912,500</del> \$962,500
N 175th Street and SR 99	---	<del>\$1,087,500</del>
<b>Shoreline and Woodway</b>		
Richmond Beach Drive, between the site and NW 196th Street	1,655,000	---
<b>Edmonds and WSDOT</b>		
SR 104 and 100th Avenue W	\$500,000	\$1,587,500
<b>Shoreline, Edmonds, and WSDOT</b>		
244th Street SW and SR 99	---	\$3,447,500
<b>Total Costs</b>	<b>\$12,447,500</b>	<b><del>\$14,965,000</del> \$11,927,500</b>

1. All costs are presented in 2008 dollars.

2. Costs listed under Proposed Action are in addition to those listed under the No Action Alternative.

3. No Action Alternative travel demand assumptions were conservative, to allow a conservative assessment of potential cumulative impacts under the Proposed Action. Future vehicle volumes under the No Action Alternative may end up being lower than those reflected in this SEIS analysis, due to regional and local transit enhancements and other demand-oriented strategies. In this case, it is possible that (1) the need for some mitigation measures may not be triggered due to cumulative conditions being lower than what was programmatically evaluated; or (2) some mitigation measures identified under No Action Alternative may alternatively be triggered by the Proposed Action. Subsequent project-level analysis would be needed to determine the

appropriate agency and applicant commitments to future transportation improvements, based on the actual proposed development levels and phasing, and provide implementing mechanisms to ensure those commitments.

### 3.11.4. Significant Unavoidable Adverse Impacts

Adoption of the proposed land use designation and zoning would be expected to result in increased traffic in the vicinity of the Paramount site. Although the effects of additional vehicles on traffic congestion can be mitigated to varying degrees through the recommended transportation improvements, the actual increase in traffic is considered a significant unavoidable adverse impact.

### 3.11.5. Supplemental Analysis to Test Alternative Trip Distribution Assumptions

The trip distribution assumption for traffic generated at the proposal site was based on a trip distribution of an existing zone located close to the site that consists of mixed land uses, similar to what could occur under the proposal. This resulted in an assumption that approximately 60% of project-generated traffic would travel to/from the north Shoreline and County area, and approximately 40% of project-generated traffic would travel to/from the King County area. The model developed for the Draft SEIS analysis indicated a tendency for project-generated traffic traveling to/from the north to choose routes through Shoreline and Edmonds parallel to SR 99, to avoid higher traffic volumes on that roadway. In their review of the Draft SEIS, both the Shoreline and WSDOT indicated concern that these two factors result in an underestimation of potential project impact on Richmond Beach Road/196th/195th/185th and SR 99

To address these concerns regarding site-generated trip distribution, a supplemental sensitivity analysis was completed for this Final SEIS, in which site-generated trip distribution was assumed to be split approximately 50% to/from the north, and 50% to/from the south. This was combined with an adjustment to the model output that maintained a higher volume of site-generated traffic on Richmond Beach Road/196th/195th/185th, between Richmond Beach Drive and SR 99. The result of combining these assumptions was an analysis scenario that reflected more intense impact on Richmond Beach Road/196th/195th/185th and SR 99, and a lower level of impact on alternate routes through north Shoreline and Edmonds.

This sensitivity analysis is intended to round out the possible choice travelers could make (more travelers sticking to the main routes, rather than choosing alternate routes), but it is still considered an order-of-magnitude assessment and does not represent commitments by local jurisdictions or by the applicant. A more detailed project-level evaluation would need to be completed at the time a specific development proposal was developed, as part of project-level environmental analysis.

Project-level analysis would include more a detailed assessment of potential impacts based on the actual development proposal, more detailed cost estimates of recommended improvements, the commitments of the applicant and local jurisdictions to fund future improvements, as well as any needed caps on development levels to ensure the balance between travel demand and infrastructure. Mechanisms would also be defined by which to ensure that the needed mitigation is implemented. It is expected that the County, applicant, and local jurisdictions would need to work closely together to

determine the appropriate level of development, level of improvement needed to address impacts of a development proposal; and commitments by all involved parties.

This supplemental analysis was conducted for the 2025 PM peak hour condition, the worst case condition, to identify project impacts under the alternative trip distribution assumptions and to compare the project impacts and potential mitigation identified in Sections 3.11.2 and 3.11.3.

## Impact Analysis

### Intersection Operations

Table 3.11-20 summarizes the PM peak hour volume increase of the Proposed Action over the No Action Alternative projected under the alternative scenario. Projections indicate that the proposal would increase traffic volumes by greater than 50% at the following intersections:

- (8) NW 196th Street and Richmond Beach Drive
- (9) NW 196th Street and 20th Avenue NW
- (10) NW 195th Street and 15th Avenue NW
- (11) Richmond Beach Road and 15th Avenue NW

More than 50% of total site-generated trips (642 out of 1,284 PM peak hour trips) would travel on Richmond Beach Road and N 185th Street through the following intersections:

- (8) NW 196th Street and Richmond Beach Drive
- (9) NW 196th Street and 20th Avenue NW
- (10) NW 195th Street and 15th Avenue NW
- (11) Richmond Beach Road and 15th Avenue NW
- (12) Richmond Beach Road and 8th Avenue NW
- (13) Richmond Beach Road and 3rd Avenue NW
- (14) Richmond Beach Road and Dayton Avenue N
- (15) N 185th Street and Fremont Avenue N
- (16) N 185th Street and SR 99

**Table 3.11-20. Intersection Volume Increase by the Proposed Action (Alternate Trip Distribution Scenario)**

<u>Intersection</u>	<u>2025 PM Peak</u>			
	<u>No Action (veh/hr)</u>	<u>Proposed Action (veh/hr)</u>	<u>Volume Increase (veh/hr)</u>	<u>% Increase</u>
1 <u>244th Street SW and SR 99</u>	<u>5,560</u>	<u>5,941</u>	<u>381</u>	<u>7</u>
2 <u>244th Street SW and Fremont Avenue N</u>	<u>1,510</u>	<u>1,593</u>	<u>83</u>	<u>6</u>
3 <u>Firdale Avenue N and 244th Street SW</u>	<u>1,100</u>	<u>1,184</u>	<u>84</u>	<u>7</u>
4 <u>244th Street SW and 100th Avenue W</u>	<u>1,150</u>	<u>1,229</u>	<u>79</u>	<u>7</u>
5 <u>SR 104 and 100th Avenue W</u>	<u>4,865</u>	<u>4,950</u>	<u>85</u>	<u>2</u>
6 <u>Algonquin Road and Woodway Park Road</u>	<u>570</u>	<u>701</u>	<u>131</u>	<u>23</u>
7 <u>238th Street SW and Woodway Park Road</u>	<u>415</u>	<u>553</u>	<u>138</u>	<u>33</u>
8 <u>NW 196th Street and Richmond Beach Drive</u>	<u>130</u>	<u>1,401</u>	<u>1,271</u>	<u>978</u>
9 <u>NW 196th Street and 20th Avenue NW</u>	<u>945</u>	<u>2,214</u>	<u>1,269</u>	<u>134</u>
10 <u>NW 195th Street and 15th Avenue NW</u>	<u>1,115</u>	<u>2,196</u>	<u>1,081</u>	<u>97</u>
11 <u>Richmond Beach Road and 15th Avenue NW</u>	<u>1,165</u>	<u>2,127</u>	<u>962</u>	<u>83</u>
12 <u>Richmond Beach Road and 8th Avenue NW</u>	<u>2,640</u>	<u>3,575</u>	<u>935</u>	<u>35</u>
13 <u>Richmond Beach Road and 3rd Avenue NW</u>	<u>2,305</u>	<u>3,092</u>	<u>787</u>	<u>34</u>
14 <u>Richmond Beach Road and Dayton Avenue N</u>	<u>2,180</u>	<u>2,964</u>	<u>784</u>	<u>36</u>
15 <u>N 185th Street and Fremont Avenue N</u>	<u>2,500</u>	<u>3,277</u>	<u>777</u>	<u>31</u>
16 <u>N 185th Street and SR 99</u>	<u>5,320</u>	<u>6,034</u>	<u>714</u>	<u>13</u>
17 <u>N 175th Street and 6th Avenue NW</u>	<u>985</u>	<u>1,093</u>	<u>108</u>	<u>11</u>
18 <u>St Luke Place N and Dayton Avenue N</u>	<u>1,050</u>	<u>1,086</u>	<u>36</u>	<u>3</u>
19 <u>N 175th Street and Fremont Avenue N</u>	<u>1,395</u>	<u>1,477</u>	<u>82</u>	<u>6</u>
20 <u>N 175th Street and SR 99</u>	<u>4,805</u>	<u>5,041</u>	<u>236</u>	<u>5</u>
21 <u>Carlyle Hall Road and Dayton Avenue N</u>	<u>1,230</u>	<u>1,268</u>	<u>38</u>	<u>3</u>
22 <u>N Innis Arden Way and Greenwood Avenue N</u>	<u>1,075</u>	<u>1,093</u>	<u>18</u>	<u>2</u>
23 <u>N 160th Street and Greenwood Avenue N</u>	<u>1,185</u>	<u>1,203</u>	<u>18</u>	<u>2</u>

veh/hr = intersection entering vehicles per hour

Table 3.11-21 summarizes projected 2025 intersection LOS under the Proposed Action for the supplemental analysis. Compared to the Draft SEIS analysis summarized in Table 3.11-13, the alternate trip distribution scenario results in an increased delay at intersections on Richmond Beach Road, N 185th Street, and SR 99. However, no additional intersection is identified to exceed the LOS standards under this scenario. Delay is projected to be decreased at locations along

N 205th Street/244th Street SW, and also at the intersections of 8th Avenue NW and 15th Avenue W with Richmond Beach Road (due to a greater number of vehicles traveling straight through the intersections, and fewer vehicles making left turns).

**Table 3.11-21. Proposed Action PM Peak Intersection Level of Service (Alternate Trip Distribution Scenario)**

	<u>Intersection</u>	<u>Traffic Control</u>	<u>DSEIS Analysis</u>		<u>Alternate Scenario</u>		<u>LOS Standard</u>	<u>Juris-diction</u>
			<u>LOS</u>	<u>Average Delay (sec/veh)</u>	<u>LOS</u>	<u>Average Delay (sec/veh)</u>		
1	<u>244th Street SW and SR 99</u>	<u>Signal</u>	<u>F</u>	<u>121</u>	<u>F</u>	<u>129</u>	<u>E/D (SR 99 HSS)</u>	<u>Shoreline/Edmonds/WSDOT</u>
2	<u>244th Street SW and Fremont Avenue N</u>	<u>Northbound Stop-Control</u>	<u>F</u>	<u>107</u>	<u>F</u>	<u>89</u>	<u>E</u>	<u>Shoreline</u>
3	<u>Firdale Avenue N and 244th Street SW</u>	<u>Northbound Stop-Control</u>	<u>C</u>	<u>15</u>	<u>C</u>	<u>15</u>	<u>D</u>	<u>Edmonds</u>
4	<u>244th Street SW and 100th Avenue W</u>	<u>Eastbound/ Westbound Stop-Control</u>	<u>A/F</u>	<u>11/ECL</u>	<u>A/F</u>	<u>9/123</u>	<u>D</u>	<u>Edmonds</u>
5	<u>SR 104 and 100th Avenue W</u>	<u>Signal</u>	<u>F</u>	<u>166</u>	<u>F</u>	<u>146</u>	<u>D (SR 104 HSS)</u>	<u>Edmonds/WSDOT</u>
6	<u>Algonquin Road and Woodway Park Road</u>	<u>Eastbound/ Westbound Stop-Control</u>	<u>A/C</u>	<u>0/18</u>	<u>A/C</u>	<u>9/17</u>	<u>A</u>	<u>Woodway</u>
7	<u>238th Street SW and Woodway Park Road</u>	<u>All-way Stop-Control</u>	<u>A</u>	<u>10</u>	<u>A</u>	<u>10</u>	<u>A</u>	<u>Woodway</u>
8	<u>NW 196th Street and Richmond Beach Drive</u>	<u>Westbound Stop-Control</u>	<u>C</u>	<u>23</u>	<u>D</u>	<u>28</u>	<u>E</u>	<u>Shoreline</u>
9	<u>NW 196th Street and 20th Avenue NW</u>	<u>All-way Stop-Control</u>	<u>F</u>	<u>68</u>	<u>F</u>	<u>90</u>	<u>E</u>	<u>Shoreline</u>
10	<u>NW 195th Street and 15th Avenue NW</u>	<u>Northbound/ Southbound Stop-Control</u>	<u>B/F</u>	<u>11/278</u>	<u>B/F</u>	<u>11/541</u>	<u>E</u>	<u>Shoreline</u>
11	<u>Richmond Beach Road and 15th Avenue NW</u>	<u>All-way Stop-Control</u>	<u>F</u>	<u>83</u>	<u>F</u>	<u>69</u>	<u>E</u>	<u>Shoreline</u>
12	<u>Richmond Beach Road and 8th Avenue NW</u>	<u>Signal</u>	<u>F</u>	<u>167</u>	<u>F</u>	<u>105</u>	<u>E</u>	<u>Shoreline</u>
13	<u>Richmond Beach Road and 3rd Avenue NW</u>	<u>Signal</u>	<u>B</u>	<u>10</u>	<u>B</u>	<u>15</u>	<u>E</u>	<u>Shoreline</u>
14	<u>Richmond Beach Road and Dayton Avenue N</u>	<u>Signal</u>	<u>B</u>	<u>12</u>	<u>B</u>	<u>13</u>	<u>E</u>	<u>Shoreline</u>
15	<u>N 185th Street and Fremont Avenue N</u>	<u>Signal</u>	<u>D</u>	<u>36</u>	<u>D</u>	<u>48</u>	<u>E</u>	<u>Shoreline</u>
16	<u>N 185th Street and SR</u>	<u>Signal</u>	<u>F</u>	<u>106</u>	<u>F</u>	<u>162</u>	<u>E</u>	<u>Shoreline/</u>

<u>Intersection</u>	<u>Traffic Control</u>	<u>DSEIS Analysis</u>		<u>Alternate Scenario</u>		<u>LOS Standard</u>	<u>Juris-diction</u>
		<u>LOS</u>	<u>Average Delay (sec/veh)</u>	<u>LOS</u>	<u>Average Delay (sec/veh)</u>		
<u>99</u>						<u>(SR 99 HSS)</u>	<u>WSDOT</u>
<u>17 N 175th Street and 6th Avenue NW</u>	<u>Southbound Stop-Control</u>	<u>C</u>	<u>18</u>	<u>C</u>	<u>20</u>	<u>E</u>	<u>Shoreline</u>
<u>18 St Luke Place N and Dayton Avenue N</u>	<u>Eastbound Stop-Control</u>	<u>C</u>	<u>15</u>	<u>B</u>	<u>15</u>	<u>E</u>	<u>Shoreline</u>
<u>19 N 175th Street and Fremont Avenue N</u>	<u>Signal</u>	<u>A</u>	<u>8</u>	<u>A</u>	<u>8</u>	<u>E</u>	<u>Shoreline</u>
<u>20 N 175th Street and SR 99</u>	<u>Signal</u>	<u>E</u>	<u>64</u>	<u>E</u>	<u>69</u>	<u>E</u> <u>(SR 99 HSS)</u>	<u>Shoreline/</u> <u>WSDOT</u>
<u>21 Carlyle Hall Road and Dayton Avenue N</u>	<u>All-way Stop-Control</u>	<u>F</u>	<u>55</u>	<u>F</u>	<u>53</u>	<u>E</u>	<u>Shoreline</u>
<u>22 N Innis Arden Way and Greenwood Avenue N</u>	<u>Eastbound Stop-Control</u>	<u>B</u>	<u>13</u>	<u>B</u>	<u>13</u>	<u>E</u>	<u>Shoreline</u>
<u>23 N 160th Street and Greenwood Avenue N</u>	<u>All-way Stop-Control</u>	<u>D</u>	<u>29</u>	<u>D</u>	<u>28</u>	<u>E</u>	<u>Shoreline</u>

ECL = Exceeds calculable limits; HSS = Highway of Statewide Significance

### Roadway Segment Operations

Table 3.11-22 summarizes projected operating conditions of the analysis roadway segments under the Proposed Action under the alternative trip distribution scenario. The table summarizes the projected volume difference under the Proposed Action, compared to the No Action Alternative.

Projections under this scenario indicate that traffic volumes would increase by greater than 50%, as compared to the No Action Alternative, on the following segments:

- (1) Richmond Beach Drive: Woodway City Limits to NW 196th Street
- (2) NW 196th Street: Richmond Beach Drive to NW 20th Avenue
- (3) NW 195th Street/Richmond Beach Road: 20th Avenue NW to 8th Avenue NW

Greater than 50% of total site-generated trips (642 out of 1,284 PM peak hour trips) are projected to travel through the following roadway segments and disperse to SR 99:

- (1) Richmond Beach Drive: Woodway City Limits to NW 196th Street
- (2) NW 196th Street: Richmond Beach Drive to NW 20th Avenue
- (3) NW 195th Street/Richmond Beach Road: 20th Avenue NW to 8th Avenue NW
- (4) Richmond Beach Road: 8th Avenue NW to SR 99

Project-generated PM peak hour volumes are projected to exceed operational capacity on segment (1) Richmond Beach Road, and segment (2) the two-lane portion of NW 196th Street (west of NW 24th Avenue) under Proposed Action conditions. As compared to the Draft SEIS analysis

summarized in Table 3.11-14, no additional road segment is identified to exceed operational capacity under this scenario.

**Table 3.11-22. Segment Volume Increase by the Proposed Action (Alternate Trip Distribution Scenario)**

Roadway Segment	Estimated Operating Capacity <sup>1</sup>	PM Peak Hour			
		No Action (veh/hr)	Proposed Action (veh/hr)	Volume Increase (veh/hr)	% Increase
1 <u>Richmond Beach Drive: Woodway City Limits to NW 196th Street</u>	<u>1,300</u>	<u>115</u>	<u>1,386</u>	<u>1,271</u>	<u>1,105</u>
2 <u>NW 196th Street: Richmond Beach Drive to NW 20th Avenue</u>	<u>1,500</u>	<u>400</u>	<u>1,668</u>	<u>1,268</u>	<u>317</u>
3 <u>NW 195th Street/Richmond Beach Road: 20th Avenues NW to 8th Avenue NW</u>	<u>3,400</u>	<u>1,060</u>	<u>2,028</u>	<u>968</u>	<u>91</u>
4 <u>Richmond Beach Road: 8th Avenue NW to SR 99</u>	<u>3,400</u>	<u>1,980</u>	<u>2,816</u>	<u>836</u>	<u>42</u>
5 <u>8th Avenue NW/NW 180th Street/6th Avenue NW: Richmond Beach Road to N 175th Avenue</u>	<u>1,500</u>	<u>940</u>	<u>998</u>	<u>58</u>	<u>6</u>
6 <u>Dayton Avenue N: Richmond Beach Road to N 175th Street/Saint Luke Place</u>	<u>1,700</u>	<u>730</u>	<u>790</u>	<u>60</u>	<u>8</u>
7 <u>Fremont Avenue N: N 175th Street to N 185th Street</u>	<u>1,500</u>	<u>885</u>	<u>966</u>	<u>81</u>	<u>9</u>
8 <u>Fremont Avenue N: N 185th Street to 244th Street SW</u>	<u>1,500</u>	<u>1,075</u>	<u>1,075</u>	<u>0</u>	<u>0</u>
9 <u>20th Street NW/Timber Lane/238th Street SW: NW 196th Street to Woodway Park Road</u>	<u>1,300</u>	<u>460</u>	<u>618</u>	<u>158</u>	<u>34</u>
10 <u>Woodway Park Road: 238th Street SW to Algonquin Road</u>	<u>1,300</u>	<u>400</u>	<u>533</u>	<u>133</u>	<u>33</u>
11 <u>244th Street SW: 100th Avenue W to SR 99</u>	<u>1,700</u>	<u>1,335</u>	<u>1,417</u>	<u>82</u>	<u>6</u>
12 <u>8th Avenue NW: Richmond Beach Road to 244th Street SW</u>	<u>1,700</u>	<u>1,120</u>	<u>1,198</u>	<u>78</u>	<u>7</u>
13 <u>3rd Avenue NW : Richmond Beach Road to 244th Street SW</u>	<u>1,500</u>	<u>695</u>	<u>696</u>	<u>1</u>	<u>0</u>
14 <u>100th Avenue W: 244th Street SW to SR 104</u>	<u>1,700</u>	<u>960</u>	<u>983</u>	<u>23</u>	<u>2</u>
15 <u>SR 99: 224th Street SW to N 185th Street</u>	<u>4,200</u>	<u>3,730</u>	<u>4,029</u>	<u>299</u>	<u>8</u>
16 <u>SR 99: N 175th Street to N 185th Street</u>	<u>4,200</u>	<u>3,720</u>	<u>3,873</u>	<u>153</u>	<u>4</u>

<sup>1</sup> Operating capacity is a planning-level estimate, based on the roadway functional classification and width. This value was estimated by applying the per-lane planning-level capacities presented in Table 3.11-1.

## Mitigation Measures

### Roadway Improvement Projects

Table 3.11-23 summarizes the recommended Proposed Action mitigation under the alternative trip distribution scenario that would be different than the mitigation presented in the Draft SEIS. The table shows that a lower level of mitigation is identified at three locations (two locations in Edmonds and one location in Shoreline), and a higher level of mitigation is identified at one location (N 185th Street/SR 99 in Shoreline).

**Table 3.11-23. Recommended Mitigation for the Proposed Action (Alternate Trip Distribution Scenario)**

<u>Location</u>	<u>Jurisdiction</u>	<u>Draft SEIS Analysis</u>	<u>Alternate Scenario</u>
4 <u>244th Street SW and 100th Avenue W</u>	<u>Edmonds</u>	<u>No Action Alternative improvement plus install a signal.</u>	<u>Same as No Action Alternative improvement.</u>
5 <u>SR 104 and 100th Avenue W</u>	<u>Edmonds/ WSDOT</u>	<u>No Action Alternative improvement plus add a westbound right-turn lane.</u>	<u>Same as No Action Alternative improvement.</u>
12 <u>Richmond Beach Road and 8th Avenue NW</u>	<u>Shoreline</u>	<u>Add a southbound right-turn lane, a 2nd eastbound left-turn lane, and a northbound right-turn lane.</u>	<u>Add a southbound right-turn lane and a northbound right-turn lane.</u>
16 <u>N 185th Street and SR 99</u>	<u>Shoreline/ WSDOT</u>	<u>No Action Alternative improvement plus add a westbound right-turn lane.</u>	<u>No Action Alternative improvement plus add a westbound right-turn lane and a 2nd eastbound left-turn lane.</u>

### Planning-Level Cost of Capacity Improvements

Table 3.11-24 summarizes the planning-level cost estimates for mitigation projects identified under this scenario. The costs presented for the Proposed Action are in addition to the costs identified under the No Action Alternative. The table shows that order of magnitude is similar to that presented in the Draft SEIS analysis, with the localized costs shifting from some locations to other locations. The total estimated cost of mitigation is slightly lower under this scenario, with recommended mitigation decreased at three locations, and increased at two locations.

This alternate scenario analysis still represents a non-project action, with the intent to provide an order-of-magnitude assessment of potential impacts and mitigation. If the proposed land use designation and zoning were approved, a site-specific development proposal would still need to be provided, which would be subject to detailed project-level environmental analysis. Project-level analysis would include a more detailed assessment of potential impacts based on the actual development proposal, more detailed cost estimates of recommended improvements, the commitments of the applicant and local jurisdictions to fund future improvements, and any needed caps on development levels to ensure the balance between travel demand and infrastructure.

**Table 3.11-24. Cost Estimates for Recommended Mitigation Projects (Alternate Trip Distribution Scenario)**

<u>Location/Jurisdiction</u>	<u>Draft SEIS Proposed Action<sup>1,2</sup></u>	<u>Alternate Scenario Proposed Action<sup>1,2</sup></u>	<u>No Action Project Costs<sup>1,3</sup></u>
<b><u>Shoreline</u></b>			
<u>244th Street SW and Fremont Avenue N</u>	---	---	<u>\$580,000</u>
<u>NW 196th Street and 20th Avenue NW</u>	<u>\$2,030,000</u>	<u>\$2,030,000</u>	---
<u>NW 195th Street and 15th Avenue NW</u>	<u>\$580,000</u>	<u>\$580,000</u>	---
<u>Richmond Beach Road and 15th Avenue NW</u>	<u>\$580,000</u>	<u>\$580,000</u>	---
<u>Richmond Beach Road and 8th Avenue NW</u>	<u>\$2,087,500</u>	<u>\$1,000,000</u>	---
<u>N 175th Street and 6th Avenue NW</u>	---	---	<u>\$580,000</u>
<u>Carlyle Hall Road and Dayton Avenue N</u>	---	---	<u>\$580,000</u>
<u>N 160th Street and Greenwood Avenue N</u>	---	---	<u>\$580,000</u>
<u>NW 196th Street, between Richmond Beach Drive and 24th Avenue NW</u>	<u>\$2,035,000</u>	<u>\$2,035,000</u>	---
<u>NW 190th Street, between NW Richmond Beach Road and 8th Avenue NW</u>	<u>\$100,000</u>	<u>\$100,000</u>	---
<b><u>Edmonds</u></b>			
<u>244th Street SW and 100th Avenue W</u>	<u>\$580,000</u>	---	<u>\$3,605,000</u>
<b><u>Woodway</u></b>			
<u>Algonquin Road and Woodway Park Road</u>	<u>\$1,800,000</u>	<u>\$1,800,000</u>	<u>\$5,000</u>
<b><u>Shoreline and WSDOT</u></b>			
<u>N 185th Street and SR 99</u>	<u>\$500,000</u>	<u>\$1,587,500</u>	<u>\$962,500</u>
<b><u>Shoreline and Woodway</u></b>			
<u>Richmond Beach Drive, between the site and NW 196th Street</u>	<u>1,655,000</u>	<u>1,655,000</u>	---
<b><u>Edmonds and WSDOT</u></b>			
<u>SR 104 and 100th Avenue W</u>	<u>\$500,000</u>	---	<u>\$1,587,500</u>
<b><u>Shoreline, Edmonds, and WSDOT</u></b>			
<u>244th Street SW and SR 99</u>	---	---	<u>\$3,447,500</u>
<b><u>Total Costs</u></b>	<b><u>\$12,447,500</u></b>	<b><u>\$11,367,500</u></b>	<b><u>\$11,927,000</u></b>

1. All costs are presented in 2008 dollars.

2. Costs listed under the Proposed Action are in addition to those listed under the No Action Alternative.

3. No Action Alternative travel demand assumptions were conservative, to allow a conservative assessment of potential cumulative impacts under the Proposed Action. Future vehicle volumes under the No Action Alternative may end up being lower than those reflected in this SEIS analysis, due to regional and local transit enhancements and other demand-oriented strategies. In this case, it is possible that (1) the need for some mitigation measures may not be triggered due to cumulative conditions being lower than what was programmatically evaluated; or (2) some mitigation measures identified under No Action Alternative may alternatively be triggered by the Proposed Action. Subsequent project-level analysis would be needed to determine the appropriate agency and applicant commitments to future transportation improvements, based on the actual proposed development levels and phasing, and provide implementing mechanisms to ensure those commitments.

## Changes to Draft SEIS Chapter 3.12 Public Services

### 3.12.1. Police and Fire and Emergency Medical Services

#### *Affected Environment*

##### Police

Law enforcement in unincorporated Snohomish County (County) is provided by the Snohomish County Sheriff's Office. The Sheriff's Office is divided into precincts serving the northern and southern areas of the County. The North Precinct operates the East Station, which responds to calls in the remote eastern reaches of the County. The Sheriff's Office also provides law enforcement services on a contract basis to several municipalities, including Stanwood, Gold Bar, and Darrington.

The Paramount site is ~~serviced by~~ under the jurisdiction of the County Sheriff's Office, South Precinct, with headquarters in Mill Creek, approximately 10 miles northeast of the site. The precinct maintains a car (Car #B4) that provides service to the southwestern portion of the County. The average response time by the Sheriff's Office to this area is 5 to 10 minutes (Ter-Veen pers. comm.).

Because of the proximity to its service area, the Shoreline Police Department has provided first response police services to the Paramount site since 2001. The Shoreline Police Station is approximately 3 miles east-southeast of the Paramount site, and the Shoreline Police Department operates a neighborhood police center, staffed by an officer and community volunteers, in Richmond Beach, approximately 1 mile from the site.

##### Fire Protection and Emergency Medical Services

Fire protection and emergency medical services in the County are provided through a combination of rural fire districts and municipal fire departments. In addition, Boeing, the Everett Naval Base, Paine Field, and the U.S. Forest Service provide their own on-site fire protection services. Water supply infrastructure maps in the County Capital Facilities Plan indicate very little water system infrastructure in the immediate vicinity of the Paramount site.

According to the Snohomish County Fire Marshall, the Paramount site is not currently within the boundaries of any of the municipal fire departments or rural fire districts of the County (Snohomish County Fire Marshal pers. comm.). The nearest rural fire district is Snohomish County Fire District 1 (FD1), which is headquartered in Everett. FD1 currently operates eight fire stations with a service area of 36 square miles in southern Snohomish County. FD1 serves approximately 150,000 residents and is also responsible for fire protection services in the cities of Mountlake Terrace and Brier. While FD1 is the nearest rural fire district, two municipal fire departments are closer and have better access to the site: Edmonds Fire Department, which also serves the Town of Woodway (Woodway), and the Shoreline Fire Department.

Paramount currently contracts with the City of Shoreline (Shoreline) Fire Department (King County Fire District #4) to provide fire suppression and emergency medical service to the site. The nearest Shoreline Fire Department response facility is Fire Station 64, located approximately 2.25 miles

southeast of the Paramount site. Station 64 is staffed by one lieutenant, four firefighters/emergency medical technicians (EMTs), and two firefighter/paramedics. The station is equipped with one pumper engine, one basic life support vehicle, and one advanced life support vehicle. The Shoreline Fire Department responded to a total of 9,420 calls in 2006. Approximately 80% of these calls were for emergency medical service (Shoreline Fire Department 2007).

## *Impact Analysis*

### **Proposed Action**

Under the Proposed Action, the Paramount site would undergo a change of Future Land Use Map (FLUM) designation and zoning, which would allow redevelopment of the site as a mixed use center, incorporating residential and retail development. Based on the assumptions set forth in Table 2-4, the Paramount site could support up to 3,500 new dwelling units with an estimated population of 6,442.

### *Police*

The County does not currently specify a level of service standard for police service, but the introduction of a concentration of residential and employment uses in the vicinity of the Paramount site would result in ~~an~~ a sharp increase in demand for police protection. According to the Washington State Office of Financial Management (Office of Financial Management 2007), an estimated total of 27,203 crimes were reported in the County in 2007, which equates to approximately 39.6 reported crimes per thousand residents per year. Based on these rates, redevelopment of the Paramount site could generate up to approximately 255 reported crimes annually. This increase under the Proposed Action would require additional patrols and more police officers than are currently assigned to the site.

Based on information from the Snohomish County Sheriff's Department, potential development under the Proposed Action would require approximately six additional deputies and associated equipment to adequately provide 24-hour police protection services and meet national standards for response times. These deputies would be officially based out of the department's South Precinct in Mill Creek, but would likely make use of a "storefront" in the immediate vicinity of the Paramount site, similar to Shoreline Police Department's operation in Richmond Beach. This solution would allow the deputies to provide rapid response without requiring the construction of a new police station. The Snohomish County Sheriff's Department estimates that annual costs for this additional service would be approximately \$700,000 for the first year, with costs declining over time as capital expenditures, such as additional patrol cars and equipment, are paid down (Beidler pers. comm.).

According to a letter from Shoreline (Olander 2009), the Shoreline Police Department will continue to provide first response police service to the Paramount site but, when and if the Paramount site is redeveloped as an Urban Center, the Shoreline Police Department will discontinue its service to the Paramount site.

While the continuation of police services from Shoreline and the increase in Snohomish County Sheriff services at the time of Urban Center development would prevent any lapse in service as a result of the Proposed Action, development under the Proposed Action could still generate significant

impacts on police services based on the additional personnel and equipment required to meet increased service demand.

### *Fire and Emergency Medical Services*

Redevelopment under the Proposed Action has a high potential to create significant impacts on fire protection and emergency medical services. Currently, the Paramount site is not within the boundaries of any municipal fire department or rural fire district, though Paramount currently contracts with the Shoreline Fire Department to provide these emergency services. The construction of the commercial and residential development anticipated allowed under the Proposed Action would could generate even greater demand for fire protection and emergency medical services than under the No Action Alternative. According to representatives of the Shoreline Fire Department, the current service agreement is based on the Paramount site's existing use as an asphalt and petroleum facility, and the department would discontinue first response service once the site redevelops as an Urban Center.

FD1 has indicated that, while it would be able to take over service of the Paramount site from the Shoreline Fire Department, the limited access to the site would make achieving short response times difficult. If FD1 were to begin providing fire and emergency medical services to the Paramount site under the Proposed Action, it is highly likely that additional staff and equipment would be required at the Mountlake Terrace Fire Station, which is the nearest FD1 station to the site (approximately 6.5 miles driving distance), or that another facility would need to be constructed to provide adequate service. Paramount has met with FD1 to discuss the provision of fire service to the site and discussions are currently ongoing. FD1 has indicated that development of the Paramount site under the Proposed Action, depending on actual build-out conditions, could possibly support a small, dedicated fire station that could provide minor fire suppression and emergency medical services, with additional aid being provided by automatic and mutual aid partner jurisdictions as necessary (Pearson pers. comm.).

Given the level and type of development permitted and the uncertain state of fire and emergency medical services at the Paramount site, development allowed under the Proposed Action could have the potential to generate significant impacts on fire and emergency medical services.

### *No Action Alternative*

Under the No Action Alternative, no change in the County Comprehensive Plan FLUM designation or zoning would occur at the Paramount site and current uses would continue. As the site is not currently developed to the fullest extent allowed by existing regulations, the No Action Alternative could add truck trips to and from the asphalt facility and increased fuel storage capacity. Under this alternative, employment at the site is expected to increase by approximately 79 to 104 employees, and the number of marine fuel transfers could nearly double over existing conditions.

### *Police*

The County Capital Facilities Plan does not establish a level of service standard for law enforcement services, but the need for additional facilities and officers is generally tied to increases in population and employment. Under the No Action Alternative, no population increase would occur, but

employment on the site could experience a slight increase over existing conditions. This additional demand is minimal; however, and no significant impacts on police protection services are anticipated.

### *Fire and Emergency Medical Services*

The County Capital Facilities Plan does not directly address fire and emergency medical services, as these services are provided by fire districts or municipalities. Identifying a level of service standard for fire protection is difficult as available services vary based on the resources of the responsible agency. One consistent standard of fire protection is water system fire flow. County building and fire codes mandate fire flow requirements for urban levels of development.

Because of the anticipated increase in fuel storage and distribution operations on the site, the No Action Alternative is likely to generate an increased demand for fire protection services. Additional discussion of water infrastructure in the vicinity can be found in Section 3.12.4, Water Systems.

### *Mitigation Measures*

#### **Police**

~~If the Proposed Action is implemented, the developer must coordinate with the County Sheriff's Office to determine the necessity of additional officers and patrols for the area.~~

Prior to the issuance of any future development approvals under the proposed land use and zoning designation, the property owner shall enter into an agreement with the Snohomish County Sheriff's Department stating that the property owner will provide a commercial storefront in the immediate vicinity of the Paramount site for use by deputies patrolling this area. Depending on the exact market value of the commercial space, cost-free use of this storefront may be considered, after analysis by the County, to be partial or full payment of associated impact fees.

#### **Fire and Emergency Medical Services**

Prior to the issuance of any future development approvals under the proposed land use and zoning designation, ~~The County should assign~~ the Paramount site shall either be assigned to one of the rural fire districts or shall contract with one of the adjacent municipalities to ensure the availability of adequate fire protection and emergency medical services, both for residential emergencies and hazardous materials incidents. Alternatively, the current agreement with the Shoreline Fire Department could be extended to cover future development in the area.

Prior to the issuance of any construction permits under the Proposed Action, the property owner shall provide documentation to the Snohomish County Department of Planning and Development that identifies the municipality or fire district responsible for providing fire and emergency medical services at the site. The County shall verify that the identified agency has the capacity to respond to emergency calls at the Paramount site in a timely manner, as defined by the level of service standards adopted by the surrounding fire departments.

Alternatively, the County may coordinate with the Edmonds Fire Department, the Shoreline Fire Department and Snohomish County FD1 to implement a mutual assistance agreement that would provide for appropriate first response service to the Paramount site by the department best suited to

provide it. Such an agreement should be in place prior to the issuance of any permits for redevelopment of the Paramount site under the Proposed Action.

### Other Potential Mitigation Measures

If the Proposed Action is approved, the County shall assume responsibility for code enforcement on the Paramount site and shall ensure that any development authorized under the Proposed Action shall comply with all applicable provisions of the Snohomish County Code. The County may delegate fire code enforcement responsibilities, through written agreement, to the fire authority to which the site is assigned for fire protection services.

### *Significant Unavoidable Adverse Impacts*

Over time, population growth and development will continue to increase the need for police and fire and emergency medical services under either alternative.

## 3.12.2. Parks

### *Affected Environment*

The County Parks Department manages approximately 9,800 acres of parkland, including trails, fresh water and saltwater beaches, river estuaries, forests, and lakes. The County classifies parks according to a combination of size, service area, and uses available. These categories include:

**Regional Parks.** These are parks with unique amenities that attract users from a wide area. They typically serve multiple jurisdictions and may incorporate both active and passive recreation opportunities. Many regional parks are established for the purpose of large-scale preservation of natural areas.

**Community Parks.** Community Parks are designed to serve the population within a 5-mile radius and often host large community events such as skateboarding or team sports. The average size of the County's community parks is 28 acres. Community parks may also include natural areas, such as shoreline access or preserved open space, as well as traditional park amenities, such as picnicking areas and playgrounds.

**Neighborhood Parks.** Neighborhood parks are typically small and intended to serve the immediately surrounding area. They can include passive uses, such as picnicking areas and hiking trails, as well as active uses, such as sports fields. These parks may also feature natural resources that have been designated for protection from development, such as wetlands or forests.

**Trails.** This classification includes local and regional trails that provide connections between and access to other parks and natural areas, as well as linear parks. Facilities in this group typically provide rest/picnic areas, trailheads, and interpretive stations.

**Open Space/Preserve.** These parks are intended to preserve wilderness areas, unique open space, or wildlife habitat. Recreation facilities at these parks are generally limited to passive uses, such as

picnic areas, trails, or boardwalks, and public access may be restricted in areas containing especially sensitive or unique natural features.

**Special Use.** Special use parks include those facilities that feature a specialized use, such as golf courses, fairgrounds, shooting ranges, or off-leash dog parks. These parks typically offer only one type of activity and may generate revenue.

The adopted level of service standard for parks in the County is one additional community park per 21,000 additional residents (Snohomish County 2006). According to the 2007 Snohomish County Parks Comprehensive Plan, no County-owned parks are located in the immediate vicinity of the Paramount site. The nearest County park is Esperance Park, a community park of 6.2 acres, located 2.75 miles northeast of the site. The park features two soccer fields, two volleyball courts, a little league baseball diamond, and a playground. The northwest corner of the park contains a forested area equipped with nature trails, and open space is available for picnicking activities. The topography of the Paramount site and its associated access restrictions make it necessary to first travel south into Shoreline before turning north to approach Esperance Park, a driving route of approximately 5 miles. When considered in this context, In addition to County parks, several King County and municipal facilities are located in the area within a shorter driving distance of the site and would be more convenient for any future residents. Point Edwards Park is located approximately 1 mile north of the site in Woodway, City Park is located approximately 1 mile north of the site in Edmonds, and Richmond Beach Center Park and Richmond Beach Saltwater Park are located 0.5 mile southeast and 0.9 mile south-southeast, respectively, in Shoreline. While the Richmond Beach Saltwater Park includes a playground, it is primarily dedicated to passive recreation and hiking, as is Point Edwards Park. Visitors seeking active recreation, such as sports activities and ball fields, are more likely to use City Park in Edmonds or Esperance Park.

## *Impact Analysis*

### **Proposed Action**

Under the Proposed Action, the Paramount site would undergo a change of FLUM designation and zoning, which would allow redevelopment of the site as an urban center, incorporating residential and retail development. Based on the assumptions set forth in Table 2-4, the Paramount site could support up to 3,500 new dwelling units with an estimated population of 6,442. This increase in population would generate additional demand for parks and recreation facilities in the area. While this population increase is below the level of service threshold for requiring an additional community park (6,442 residents = 0.31 park), given the general lack of recreational opportunities in the immediate vicinity, it is likely that a perceived impact on parks and recreation facilities would occur under the Proposed Action. some additional recreational facilities would be required to serve the additional resident population. As the County does not currently use an acreage-based level of service standard for parks, the amount of parkland necessary to satisfy this potential demand under the Proposed Action is estimated from the average size of a community park in the County, which is 28 acres. Based on this estimate, the Proposed Action could potentially generate the need for approximately 8.7 acres of additional parkland.

Because of the Paramount site's geographic isolation from the rest of rural Snohomish County, it is anticipated that any residents of the site under the Proposed Action would have strong links to the nearby cities of Shoreline and Edmonds and would make use of the park and recreation facilities in these cities. The City of Shoreline Parks, Recreation and Open Space Plan indicates that park usage by Shoreline residents is already high, and additional population at the Paramount site would have the potential to place further demands on municipal facilities. Given its location near the Paramount site (approximately 1.5 miles by car) and its status as a regional park, the Richmond Beach Saltwater Park is the most likely facility to be affected by any increase in demand for passive parks activities generated under the Proposed Action. As the only active recreational facilities at this park are a playground and hiking trails, demand for active recreation such as sports events and ball fields is likely to be absorbed primarily by City Park in Edmonds.

### **No Action Alternative**

Under the No Action Alternative, the Paramount site would continue in its current industrial uses and no residential development would occur. As such, no additional demand for parks and recreation facilities would be generated.

### *Mitigation Measures*

Future development on the Paramount site would be required to comply with Chapter 30.66A of the Snohomish County Code (SCC), which sets forth development impact fees and related park dedication requirements proportionate to the size of the proposed development. Future development on the site should also include parks and/or open space dedication as integral parts of the urban center design, and both the Snohomish County Parks Department and the Shoreline Department of Parks, Recreation and Cultural Services should be consulted during the design process. Additional parks and open space dedications may be made in lieu of impact fees.

Any development permitted under the Proposed Action that would add more than 500 residents to the Paramount site shall be required to provide parks and open space amenities on site that allow for active recreational activities. Examples include, but are not limited to ball fields, playgrounds, and tennis courts. The proposed recreational facilities shall be approved by the Snohomish County Parks Department prior to the issuance of a construction permit.

### *Significant Unavoidable Adverse Impacts*

With mitigation, no significant unavoidable adverse impacts on parks are anticipated.

## Changes to Draft SEIS Chapter 3.13 Land and Shoreline Use Patterns

### *Impact Analysis*

#### Proposed Action

#### *Indirect Impacts*

While the Proposed Action does not entail a change of shoreline environment designation, use of the property is anticipated to transition away from its current industrial function. Loss of this waterfront industrial property could potentially create additional demand for such facilities elsewhere in the region, such as in the Urban shoreline zone of nearby Shoreline.

## Changes to Draft SEIS Chapter 3.14 Relationship to Plans and Policies

### 3.14.3. Affected Plans and Policies and Consistency Analysis

#### *Affected Plans and Policies—Snohomish County*

#### Snohomish County Shoreline Management Master Program (SMMP)—Master Program Elements

#### *Agricultural Element*

**Goal.** Promote the development and growth of Snohomish County's agricultural industry and preserve the County's existing and potential agricultural land.

**Consistency:** This goal is not relevant as there are no agricultural lands on the Paramount site.

#### *Circulation Element*

**Goal.** Permit safe and convenient circulation systems appropriate to the shoreline environment which cause minimum disruption to shoreline access, shoreline environment, and minimum conflict between the different users.

#### **Policies:**

1. Locate and design circulation systems so as to preserve a high number of options and to allow for rapid technological advances.
2. Locate and design circulation systems so as to insure the overall integrity of other social and economic activities and natural systems.
3. Design circulation systems which provide safe and efficient movement of people and products while providing for alternative modes of transportation.

4. Allow only those circulation activities which do not produce undue pollution of the physical environment and which do not reduce the benefits which people derive from their property without due compensation.
5. Locate and design major circulation systems well away from the land-water interface except for necessary crossings so that natural shorelines and floodplains remain substantially unmodified.
6. Encourage the use of waterborne transportation and commuter ferry service.
7. Encourage corridors for transportation and utilities when they must cross shorelines.

***Consistency:** The Proposed Action would allow mixed-use residential/commercial development and public access to the shoreline that is not currently available. Consistency with other policies cannot be determined until a development application is filed.*

### *Conservation Element*

**Goal.** Assure preservation, protection and restoration of Snohomish County's unique and nonrenewable resources while encouraging the best management practices for the continued sustained yield of renewable resources of the shorelines.

#### **Policies:**

1. Protect the scenic and aesthetic qualities of shorelines and vistas to the fullest extent practicable.
2. Provide for a beneficial utilization of shoreline resources in a way which will not have an unreasonable adverse impact on other natural systems or the quality of the environment.
3. Identify those areas which have a potential for restoration of damaged features or ecosystems to a higher quality than may currently exist, develop standards for improvement of the conditions in those areas, and provide incentives for achieving such standards.
4. Provide incentives to preserve unique, rare and fragile natural features and resources as well as scenic vistas, parkways and habitats of wildlife.
5. Give priority to maintaining the function of natural systems in appropriate environments.
6. Encourage the best management practices for the sustained yield of replenishable resources.
7. Identify those areas which are necessary for the support of wild and aquatic life and those having unique geological/biological or historical significance and establish regulations to minimize adverse impact on those areas.
8. Encourage public and private shoreline owners to promote the proliferation of wildlife, fish and plants without unduly interfering with existing activities.

***Consistency:** The site has not been in a natural state for approximately 100 years. Redevelopment of the site will enhance the natural systems and clean up the contaminated soil, which may encourage new types of wildlife and vegetation. A detailed analysis of the natural systems will be required when a development application is filed.*

### *Economic Development Element*

**Goal.** Allow only those industrial, commercial and recreational developments particularly dependent on their location on and use of Snohomish County's shorelines, as well as other developments that will provide substantial numbers of the public an opportunity to enjoy the shorelines. Minimal disruption of the natural environment is envisioned in the implementation of this goal.

#### **Policies:**

1. Give priority to commercial, industrial and recreational development that is water-surface or shoreline dependent and those developments that will provide substantial numbers of the public an opportunity to enjoy the shorelines.
2. Limit the adverse effects of new commercial, industrial and recreational development upon the physical environment and natural processes.
3. Prevent commercial and industrial development from scattering randomly or from locating in undeveloped areas prematurely.
4. Locate commercial and industrial development in areas already developed so long as such areas have not reached their carrying capacity.
5. Encourage the development of commercial, industrial and recreational activities which can make use of existing public services.
6. Encourage development toward a multi-use concept to provide public access to the shoreline while maintaining the economic viability of the principal use.

***Consistency:*** The Proposed Action is not water-dependent so would not be consistent with policy 1. The Proposed Action is consistent with policies 3 through 6. Any requirements to satisfy policy 2 would be specified upon the filing of a development application.

### *Historical, Cultural, Scientific Element*

**Goal.** Protect, preserve and encourage restoration of those sites and areas on the shorelines of Snohomish County which have significant historical, cultural, education or scientific values.

***Consistency:*** In the programmatic analysis, there were no significant areas that had historical, cultural, educational, or scientific values. Further analysis would take place upon the filing of a development application.

### *Implementation Element*

**Goal.** Further the intent and policy of the Shoreline Management Act of 1971 through a fair, balanced and impartial administration of the substantial development permit process and other legal requirements of the act.

***Consistency:*** This goal will be implemented upon the filing of a development application.

### *Public Access Element*

**Goal.** Assure and regulate safe, convenient and diversified access for the public to the publicly owned shorelines of Snohomish County and assure that the intrusions created by public access will recognize

the rights of private property owners, will not endanger life, and will not adversely affect fragile natural areas.

**Policies:**

1. Respect and protect the enjoyment of private rights in shoreline property when considering public access development.
2. Locate, design and maintain public access development so as to protect the natural environment and natural processes.
3. Provide for the public health and safety when developing public access.
4. Purchase or otherwise make available to the public shoreline properties including tideland tracts if their value for public use merits such action.
5. Provide for and design various types of access which are appropriate to the shoreline environment and its specific uses.
6. Control and regulate public access on the publicly-owned shorelines to insure that the ecology shall not be unduly damaged by public use.

*Consistency: The Proposed Action site is not publicly owned so the primary concerns of any future development would be to follow policies 1, 2, and 3. Any requirements would be specified upon the filing of a development application.*

***Recreational Element***

**Goal.** Provide additional opportunities and space for diverse forms of recreation for the public.

**Policies:**

1. Identify, preserve, protect and purchase, if feasible, areas with unique recreational characteristics before other development makes such action impossible.
2. Encourage recreational use consistent with the ability of the site to support such use.
3. Encourage location, design and operation of recreational development for maximum compatibility with other uses and activities.
4. Provide a balanced choice of recreational opportunities.
5. Encourage innovation and cooperative techniques among public agencies and private persons which increase and diversify recreational opportunities.
6. Encourage private investment in recreational facilities open to the public.
7. Do not substantially impair original natural or recreational values when developing recreational uses.
8. Give recognition to the recreational values of shorelines in their natural state.
9. Encourage compatible recreational uses in transportation and utility corridors.

***Consistency:*** The Proposed Action may include public access to the shoreline but no specific recreational components have been identified. Any requirements would be specified at the time of development application.

### ***Shoreline Use Element***

**Goal.** Assure appropriate conservation and development of Snohomish County's shorelines by allowing those uses which are particularly dependent upon their location on and use of shorelines, as well as other development which provides an opportunity for substantial numbers of people to enjoy the shorelines. This must be done in a manner which will achieve an orderly balance of shoreline uses that do not unduly diminish the quality of the environment.

***Consistency:*** The Proposed Action will allow substantial numbers of people to enjoy the shoreline, which is not currently accessible at the site.

### **Snohomish County Shoreline Management Master Program (SMMP)–Urban Environment Designation Criteria**

The site of the Proposed Action is designated as an Urban Environment in the SMMP, a designation that includes areas of high-intensity land use. This environment is particularly suitable for those areas presently subjected to extremely intensive use pressure and to areas planned to accommodate urban expansion. Shoreline areas to be designated as an Urban Environment should possess one or more of the following criteria:

- areas of high-intensity land use including recreation, residential, public facility, commercial, industrial development and intensive port activities;
- areas designated in the adopted plans of public agencies for expansion of urban uses;
- areas possessing few biophysical limitations for urban development; and
- areas that can provide the necessary infrastructure of public services and utilities and access to accommodate urban development.

### **Urban Environment Management Policies**

1. Because shorelines suitable for urban uses are a limited resource, emphasis should be given to directing new development into already developed, but underutilized areas.
2. Give priority in Urban Environments to water dependent, industrial and commercial uses requiring frontage on navigable waters.
3. Give priority to planning for and developing public visual and physical access to the shoreline in the Urban Environment.
4. Identify needs and plan for the acquisition of urban land for permanent public access to the water in the Urban Environment.
5. Design industrial and commercial facilities to permit pedestrian waterfront activities where appropriate.
6. Link, where practical, public access points with nonmotorized transportation routes such as bicycle and hiking paths.

7. Encourage maximum multiple use of urban shoreline areas.
8. Promote redevelopment and renewal of substandard or obsolete urban shoreline areas in order to accommodate future water-dependent users and make maximum use of the available shoreline resource.
9. Actively promote aesthetics when considering urban shoreline development by means of sign control regulations, architectural design standards, planned unit development standards, landscaping requirements and other such means.
10. Regulate all urban shoreline development in order to minimize adverse impact upon adjacent land areas and shoreline environments.

**Consistency:** *The Paramount site is designated as an urban shoreline environment in the SMMP. It is now, and has been for many decades, used for industrial purposes as a petroleum products storage facility and processing and distribution operation. The Proposed Action would allow redevelopment of the site as an Urban Center comprising a mix of high density residential and commercial uses with significant required public circulation facilities, and open space.*

*The proposed Urban Center (UC) comprehensive plan designation is consistent with one or more of the urban shoreline environment designation criteria. The proposed designation would allow for a continuation of intensified use of the site. However, this mixed-use designation would provide the opportunity for public physical access to the adjacent shoreline that was previously not available. Necessary public services, utilities, and access would be available to accommodate the proposed development of Urban Centers. Since the site is fully developed, the Proposed Action is consistent with the urban shoreline environment as there are few biophysical limitations for future urban development. However, redevelopment of the site under the UC designation could result in potential restoration in the shoreline setback area.*

*The Proposed Action consistency analysis regarding the Urban Environment Management Policies follows:*

1. *The Proposed Action will bring new development into an underdeveloped area and is consistent with this policy.*
2. *The Proposed Action is not a priority Urban Environment land use as Urban Centers are not water-dependent and do not require frontage on navigable waters. However, the Proposed Action could result in the future development of permanent public access to the shoreline, which is not available under the No Action Alternative. The Proposed Action would promote the redevelopment and renewal of an obsolete urban shoreline area that could accommodate future water-dependent activities and make maximum use of the available shoreline resource. Therefore, the Proposed Action is partially consistent with this policy.*
3. *If public access to the waterfront is provided with future development, this policy would be consistent with the proposal. See 3.14.4 for mitigation measures for policies 3, 4, and 5.*
4. *If permanent public access is required of future development, the Proposed Action would be consistent with this policy. See policy 3 above.*

5. See policy 3 above.
6. If pedestrian and bicycle connectivity is required of future development, the Proposed Action would be consistent with this policy. See 3.14.4 Mitigation Measures below.
7. The Proposed Action allows a mixed-use development and is consistent with this policy.
8. The Proposed Action would allow redevelopment of the site but the mixed-use development anticipated would not target water-dependent users, so the Proposed Action is consistent with portions of this policy.
9. Design controls are in place for Urban Centers, so the Proposed Action is consistent with this policy.
10. Regulations are in place to monitor impacts on adjacent land and shoreline so the Proposed Action is consistent with this policy.

### ***General Policy Plan (GPP)***

**Objective TR 1.A.** Prepare, in cooperation with the cities, the Washington State Department of Transportation (WSDOT), regional agencies, Sound Transit, Community Transit, and Everett Transit, standards for public transportation services and facilities consistent with adopted road standards, the land use element, and the natural environment element of the county's comprehensive plan.

**TR Policy 1.A.1.** Public transportation planning shall be integrated with land development review and the design and maintenance of public roads.

**TR Policy 1.A.2.** Public transportation shall be extended throughout the urban area at a level of service appropriate to the planned form and intensity of development.

**Objective TR 1.C.** Establish access and on-site circulation standards to maintain the safety and integrity of the arterial roadway system.

**TR Policy 1.C.1 A.** A countywide network of primary corridors shall be identified that provide for multi-modal transportation services between centers designated on the comprehensive plan.

**Objective TR 2.A.** In cooperation with the cities, make the designated centers the focus of residential and employment growth and transportation investment in unincorporated county areas.

**TR Policy 2.A.1.** Roadways serving designated centers shall be redesigned, improved, and maintained as primary corridors for multi-modal travel.

**TR Policy 2.A.2.** A transit-supportive transportation system shall be provided linking designated centers.

**TR Policy 2.A.4.** An interconnected system of high-occupancy vehicle (HOV) lanes and treatments shall be provided to serve the designated centers and transportation centers within the urban area.

**TR Policy 2.A.5.** A regionally coordinated system of bikeways and walkways shall be planned to serve the designated centers and transportation centers.

**Objective TR 2.B.** In cooperation with the cities, promote a variety of convenient transportation services to compact and attractively designed centers.

**TR Policy 2.B.2.** High-occupancy vehicle use and alternatives to single-occupancy vehicles shall be promoted in centers through higher density single family and multi-family developments.

**Objective TR 5.D.** Participate with the cities, transit agencies, Sound Transit and WSDOT in a cooperative planning process for public transportation and high-capacity transit.

**TR Policy 5.D.3.** Development review shall be performed with transit agency participation to ensure site plan compatibility with public transportation and other high-occupancy vehicles.

**Consistency:** *The County has adopted a Transportation Element as part of the Comprehensive Plan and a concurrency and road impact mitigation regulation (SCC 30.66B) which requires land use to be compatible with road capacity. The objectives and policies enumerated above emphasize the desire to focus growth in the County toward attractively designed, designated centers that contain high-density housing and good transportation accessibility and efficiency including transit, HOV lanes, bike paths, and walkways. The Proposed Action could provide opportunities for residential and employment growth as the UC designation allows and encourages high density residential and mixed use development. The Draft SEIS analyzed, at a programmatic level, the transportation improvements that may be necessary under both the Proposed Action and No Action Alternative. Further transportation planning would be integrated with the development review at the time of application. Also, see Section 3.14.4 below outlining possible mitigation measures to achieve consistency with policies requiring interjurisdictional coordination. Based on the points outlined, the Proposed Action is consistent with the transportation policies.*

## *Affected Plans and Policies–Woodway*

### *Point Wells Land Use Objective and Guiding Principles*

Woodway’s 1994 planning process included work on a Point Wells Subarea Plan. The report gives an overview of the community values and sets forth Land Use Objectives and Guiding Principles and Land Use Alternatives. The report is adopted in the Appendices of the 2004 Comprehensive Plan (Town of Woodway 2004).

**Consistency:** *Although the Land Use Objectives and Guiding Principles contain language indicating that the waterfront area (most of the Paramount site) could be redeveloped into an economically viable, pedestrian-oriented, land use mix, with pedestrian access to the shore, the Community Values section indicates a preference for a restored natural area with water-dependent uses rather than a highly urban development. However, the preferred alternative for the waterfront area “reflects the property owner’s desire to maintain the existing industrial use as the planned future use.” The February 24 and March 23, 2009, comment letters from Woodway indicate that the applicant has*

discussed a mixed-use proposal with the town and that Woodway is supportive of the concept of a mixed-use development.

~~Although there is some inconsistency~~ Because of inconsistencies within the Point Wells Subarea Plan, it appears the Proposed Action would not be consistent with the parts of the plan and not consistent with other parts.

### 3.14.4. Mitigation Measures

For the Proposed Action to achieve consistency with the County’s SMMP Urban Environment Management Policies, the County could adopt the following mitigation measure:

- Require permanent public access to a shoreline of statewide significance as part of any new multifamily residential, commercial or mixed use development.

For the Proposed Action to achieve consistency with the County’s objectives and policies, the County could amend and/or clarify ~~the following~~ policy 5.B.12 and adopt other GPP policies:

- Policy 5.B.12. To clarify the policy, the following amended language could be considered (new language underlined): “Within the Southwest UGA, parcels designated Urban Industrial (on Point Wells) shall be considered for future redesignation from Urban Industrial to ~~((Mixed Use))~~Urban ~~((c))~~Center designation upon ~~((receipt))~~issuance of ~~((necessary studies))~~a programmatic, non-project environmental impact statement addressing ~~((all permitting considerations such as site development,))~~ environmental impacts, infrastructure, and ~~((issues))~~ the provision of urban services.”
- Any future proposal under the UC designation will clearly demonstrate how access to high-capacity transit routes that meet the appropriate level of service will be provided.
- UC designation is contingent on the availability of high-capacity transit service that offers all-day transit, pedestrian, and bicycle facilities; connectivity to surrounding communities; and a planning process that involves citizens, agencies, and surrounding jurisdictions.

For the Proposed Action to achieve consistency with Woodway’s goals and policies, the following could occur:

- Coordinate between the County and Woodway regarding planning and regulations and an interlocal agreement would need to occur to be consistent with LUG-10, LUP-18 and LUP-19.
- Establish urban-level services to be consistent with LUG-4 and LUP-1.
- Woodway could amend LUP-20 and LUP-21 to designate the Paramount site as mixed use.

For the Proposed Action to achieve consistency with Shoreline’s goals and policies, the following could occur:

As the relevant transportation goals require coordination with Shoreline’s neighboring jurisdictions to assess the impact of new development on the transportation system, including mitigation and funding, the affected jurisdictions could meet to determine transportation strategies.