

FINAL ENVIRONMENTAL IMPACT STATEMENT
For The
City of Port Angeles
Comprehensive Plan

Prepared in compliance with:

The Washington State Environmental Policy Act (SEPA) 1971
Chapter 43.21C, Revised Code of Washington (revised 1983)

SEPA Guidelines, effective January 1976 (revised April 4, 1984), Chapter 197-11-
442, Washington Administrative Code.

Date of Issue:

August 6, 1993

**CITY OF PORT ANGELES
COMPREHENSIVE PLAN
FINAL ENVIRONMENTAL IMPACT STATEMENT
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FACT SHEETS

NAME OF PROPOSAL: City of Port Angeles Comprehensive Plan

PROPOSED ACTION: Port Angeles Draft Comprehensive Plan

The proposed action consists of revising the City's Comprehensive Plan in accordance with the State's Growth Management Act (RCW 36.70A). The Draft Comprehensive Plan includes revision for the mandated elements on land use, transportation, housing, utilities and capital facilities and elements on growth management, conservation and economic development. The proposed action does not include a Highway 101 by-pass but instead has an alternate cross-town route for local traffic on Lauridsen Boulevard east of Race Street and a truck route on Race Street and Lauridsen west of Race Street. The Draft Comprehensive Plan also includes a 3,500 acre Urban Growth Area (UGA) south and east of the City and modest set of concurrency policies and standards.

ALTERNATIVES:

Alternative 1: The No Action Alternative

The No Action Alternative would be to re-adopt the existing 1976 Comprehensive Plan without regard to consistency with the Growth Management Act requirements. Alternative 1 is simply a continuation of the City's current land use policies and development pattern. The alternative includes a Highway 101 by-pass on Lauridsen Boulevard, a no-limit Urban Growth Area at suburban densities in unincorporated Clallam County, and no concurrency requirement for capital facilities.

Alternative 2: The Strong Growth Management Act Regulation Alternative

The Strong Growth Management Act Regulation Alternative is to adopt the policies of the Draft Comprehensive Plan alternative with revisions for maximum use of local discretion in setting Growth Management Act requirements. Alternative 2 revises the land use policies and development pattern to minimize costs of new development on existing City taxpayers by controlling the timing and location of public infrastructure improvements. This alternative includes a Highway 101 by-pass south of Scribner Road, a small Urban Growth Area (east of the City), and a stringent concurrency standard for capital facilities needed for new development.

PROPOSAL LOCATION:

The location of the proposal is all the land within the City of Port Angeles and land within the proposed Urban Growth area surrounding and adjacent to the City of Port Angeles.

PROPONENT:

The City of Port Angeles
P.O. Box 1150
321 E. Fifth
Port Angeles, WA 98362

IMPLEMENTATION DATE:

The adoption of the Port Angeles Comprehensive Plan is anticipated to be October 19, 1993.

BACKGROUND DATA LOCATION:

**City of Port Angeles
P.O. Box 1150
321 E. Fifth
Port Angeles, WA 98362**

ERRATA SHEETS

The following corrections and additions are to the Draft Environmental Impact Statement For The Port Angeles Comprehensive Plan, dated March 8, 1993. Minor word changes within paragraphs are shown in bold typeface. The corrections listed below are also included in the Final Environmental Impact Statement Summary and Description of the Proposed Action and Alternatives.

Page iv, Table of Contents,

Table 3. Existing Acreage by Land Use Category in Port Angeles is located on page 40.

Page vi, DATE OF FINAL ACTION:

The date of final action identified in the Draft EIS was to be June 15, 1993 not June 15, 1992. However, because the Washington State Legislature has extended the time for Comprehensive Plans prepared under the Growth Management Act to be adopted, the current date of Final Action is anticipated to be on or before October 1, 1993.

Page I-5, Alternative 2: The Strong Growth Management Act Regulation Alternative.

First paragraph, second sentence should be replaced by:

Under this alternative, the land use designations within the City would generally be the same as the Proposed Action. The exception is where there are additional clusters of Medium Density Residential in Alternative 2.

Page I-7, Environmental Choices Among The Alternatives.

First paragraph, last sentence should be replaced by:

In the DEIS, these choices can be characterized by the effectiveness of the three distinct approaches in **resolving** significant issues of environmental impacts associated with future development.

Page I-8, Environmental Choices Among The Alternatives.

Second paragraph, second sentence should be replaced by:

The Draft Comprehensive Plan proposed requiring only concurrent capital improvement to transportation/transit, water and subdivision related facilities as mandated by state laws including the Growth Management Act. This would result in development decisions similar to those made now with SEPA substantive authority but with a stronger local policy basis than currently exists under the No Action Alternative.

Page I-10, Summary of Impacts, Resource Lands.

Alternative 2: The Strong GMA Regulation Alternative

First Paragraph, second sentence should be replaced by:

With wetlands identified, the storm drainage utility would be able to include wetlands within its **regulations** for surface water drainage.

Page I-11, Summary of Impacts, Land and Shoreline Use.

The Draft Comprehensive Plan, last paragraph, last sentence should read:

As a result preservation of the shoreline environment is **inadequate**.

This is a significant project that would otherwise pose a significant impact on the City but one that can be cost shared with the project proponent(s).

Page I-17, Summary of Impacts, Utility Services, Alternative 1: The No Action Alternative, Water.
First column, third paragraph should be replaced by:

The 1976 Plan utility policy is generally contrary to the intent of the Growth Management Act that call for cities to provide urban level **facilities** within urban areas.

Page I-17, Summary of Impacts, Utility Services, Alternative 2: The Strong GMA Regulation Alternative, Sewer.
Second column, Second paragraph should be replaced by:

There would be an emphasis on increasing density in areas already containing urban **utilities**. The cost of providing and maintaining this sewer system would be substantially less than the other alternatives.

Page I-19, Summary of Mitigation Measures, Water.
The Mitigation Measure should be changed to a Potential Mitigation Measure as follows:

Potential Mitigation Measure

- o **Implement regulations**, as recommended in the Plan, designed to protect and enhance water quality and to assure existing water quality is maintained.

Page I-19, Summary of Mitigation Measures, Environmental Hazards.
The fifth Mitigation Measure listed should be changed to a Potential Mitigation Measure as follows:

Potential Mitigation Measures

- o The City and County, by joint action, should adopt an airport obstruction zone and a height restrictive zoning ordinance which corresponds to the approach and clear zone plan.

Page I-19, Summary of Mitigation Measures, Land and Shoreline Use.
Second column, last paragraph should be replaced by:

- o **Prioritize Potential Growth Areas.** Identify areas of the City which are over-capacity, as well as, under capacity in terms of infrastructure that would accommodate higher density development and absorb a greater portion of the future growth.

Page I-20, Summary of Mitigation Measures, Land and Shoreline Use.
First column, the second Mitigation Measure listed should be changed to a Potential Mitigation Measure as follows:

Potential Mitigation Measures:

- o **Refined data for UGA's.** Work cooperatively with the County to define past rates of growth for single family, multifamily, commercial and industrial categories for the Urban Growth Areas. Also to work cooperatively with the County to gather data on the amounts of undeveloped land vs. vacant land for the designated Urban Growth Areas (Subareas D, G and H).

Page I-22, Summary of Mitigation Measures, Transportation.

First column, second mitigation measure should be changed to a Potential Mitigation Measure as follows:

Potential Mitigation Measure:

- o Careful study should be given to creation of a downtown transportation terminal. Should such a development be pursued, it should be considered only in a context of a mixed use type development so it can become an economic asset. Any multimodal transportation facility should be carefully sited to avoid aggravating traffic congestion and pedestrian safety concerns.

Page I-22, Summary of Mitigation Measures, Transportation.

First column, third mitigation, last sentence should be replaced by:

Concurrency requirements for development **and** redevelopment **should support** transit improvements, as well as, road improvements (e.g. bus shelter, space or construction for bus turn-out).

Page I-23, Summary of Mitigation Measures, Public Services, Schools.

Second column, last Mitigation Measure should be changed to a Potential Mitigation Measure as follows:

Potential Mitigation Measure:

- o Establish a process by which the efforts of the City (planning and development review) can coordinate with the School District (facilities planning).

Page I-24, Summary of Mitigation Measures, Public Services, Parks and Open Space.

First column, second Mitigation Measure should be changed to a Potential Mitigation Measure as follows:

Potential Mitigation Measure:

- o Target **an area** and begin inquiries into the acquisition of park land at the western edge of the City, to prepare for anticipated development.

Page I-24, Summary of Mitigation Measures, Utility Services, Storm Drainage.

Second column, first Mitigation Measure should be changed to a Potential Mitigation Measure as follows:

Potential Mitigation Measure:

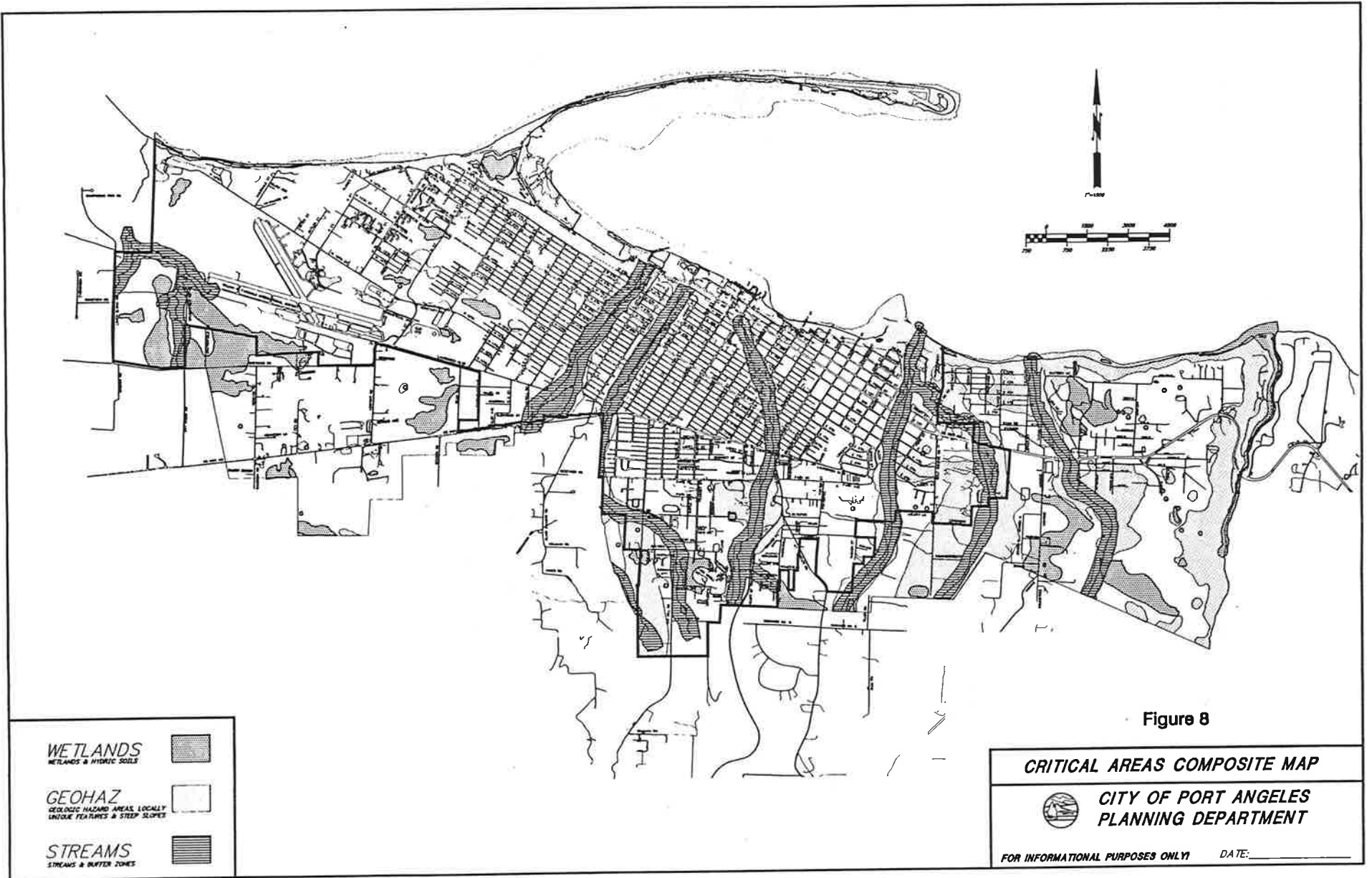
- o Identify policies or programs which will educate the public on non-point pollution from urban storm water runoff.

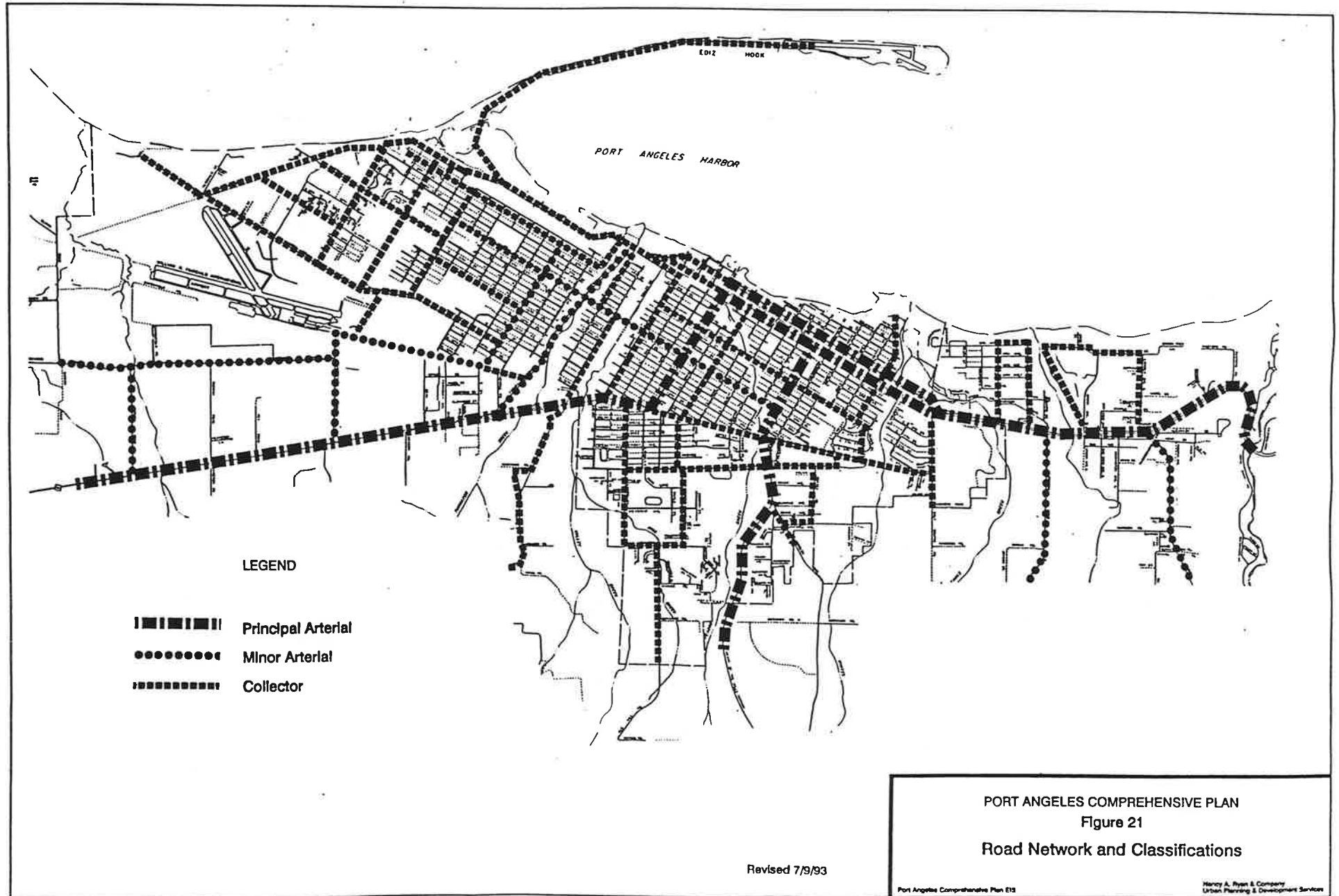
Page I-24, Summary of Mitigation Measures, Utility Services, Solid Waste.

Second column, third Mitigation Measure should be changed to a Potential Mitigation Measure as follows:

Potential Mitigation Measure:

- o The City should coordinate with Clallam County and the Port of Port Angeles for the possible use of wood waste disposal sites for wood waste generated by new development.





Departmental comprehensive planning such as water, sewer, storm water and parks and recreation shall be consistent with the City's Comprehensive Plan and should be implemented through all land use approvals and construction permits.

CHAPTER I.

SUMMARY

A. INTRODUCTION

The Draft Comprehensive Plan has undergone some minor revisions to both the policy language and map since the October 28, 1992 Growth Management Committee Draft Plan was presented to the Planning Commission. The Planning Commission forwarded a recommended Comprehensive Plan to the City Council on February 24, 1993. The Capital Facilities element was not included in either the GMAC or Planning Commission recommendations as yet and is currently being prepared.

The current version of the policies are contained in section D of this summary chapter. The Planning Commission revisions to the map have identified two areas of medium density residential at the western end of the City. These medium density areas do appear on the Strong Growth Management Regulation Alternative Map, so the impacts of the change have been analyzed as a part of the Draft EIS.

Environmental review of the Capital Facilities Element of the Comprehensive Plan will be initiated once the Draft Capital Facilities Element is available.

B. PROPOSAL OBJECTIVES

The objectives of the Draft Comprehensive Plan are to:

- o Prevent premature development of costly infrastructure and prevent urban sprawl,
- o Protect the environment,
- o Provide a community of viable districts and neighborhoods,
- o Provide public services efficiently, adequately and concurrently with development, and
- o Promote community identity.
- o Designate an adequate land supply for residential, commercial and industrial and open space uses.

C. CONCLUSIONS

1. Major Conclusions of the Draft EIS

Increases in industrial production and vehicle trips associated with population and business/employment growth will increase the amount of pollutants, thus impacting air quality.

Surface water quality will decrease, and storm water runoff quantity will increase, as further urban and suburban development takes place. Implementation of storm water

drainage utility. This issue is currently under study to see if it is feasible to build and operate a storm drainage system, much like the municipal water or sewer systems. The Draft EIS Mitigating Measures identify other specific areas where additional studies, actions or regulations will be needed to implement the policies. Whether these measures will be followed or when the work will be completed is uncertain.

It is yet undecided what facilities and services will be subject to concurrency. Concurrency means that the road, school, water or sewer service, etc., would need to be in place before a development/building could be operating (or occupied). Making many services and facilities subject to concurrency standards will place a high cost on new development.

The Capital Facilities Element of the Comprehensive Plan has yet to be completed. The Plan should identify the expenditures (public or private) necessary to maintain adequate services and facilities as growth occurs.

3. Environmental Choices Among the Alternatives

This section summarizes the environmental choices among the three alternative courses of action analyzed in this Environmental Impact Statement. The Draft Comprehensive Plan tries to balance impact mitigation and regulatory change to be carried out under the Growth Management Act. The No Action Alternative minimizes regulatory change without regard to impact mitigation that is called for in the Act, while the Strong GMA Regulation Alternative maximizes impact mitigation without regard to regulatory change which can shift how growth may occur. Variations of these alternatives are, therefore, expected to exhibit more or less of a balance between impact mitigation and regulatory change. There is no science or measurable weighing of this concept of balance; however, there is evidence of more impact mitigation or less regulatory change which can be evaluated and lead to conclusions about various Comprehensive Plan policies and designations. In the EIS, these choices can be characterized by the effectiveness of the three distinct approaches to resolve significant issues of environmental impacts associated with future development.

Based on public testimony, the first major issue or area of controversy is whether or not to have a Highway 101 by-pass of the City's major business areas. The Draft Plan resolves this issue by deciding not to have or even plan for a new Highway 101 route, and this decision is based on the uncertainty of need for such a transportation facility in the foreseeable future. The No Action Alternative continues the somewhat compromised plan for a northern alternate route through the urbanized area of the City where 100 feet of right-of-way has been planned; new commercialization along this route is not prohibited by the 1976 Plan. The Strong GMA Regulation Alternative proposes a southern route through less developed areas and with less cost to local taxpayers; commercialization along this route would be prohibited by policy in such a plan. The Environmental Impact Statement identifies that a by-pass is warranted based on the forecasts for traffic at the end of and beyond the 20 year life of the plan and that planning for a by-pass corridor and building a second cross-town route should begin now.

A second major issue is what size Urban Growth Area should be designated and in effect how concentrated a development pattern is desirable for the character of the City and surrounding area. The Draft Plan opts for a larger UGA which encompasses unincorporated areas already characterized by urban development and adjacent areas which are planned to be served by the City in the next twenty years and which can be allowed to be develop now at suburban densities. Alternative 1 has no UGA and, therefore, urban development would be more or less confined to the existing City limits,

SUMMARY OF IMPACTS

NATURAL ENVIRONMENT

Air Quality

The Draft Comprehensive Plan

The growth that results from the adoption of the Comprehensive Plan will not significantly change the ambient air quality. The current sources of pollution will be the same for the future under the Draft Comprehensive Plan or for either of the alternatives. The amount of pollution from these sources would be linked to population size and density and the nature of the industry.

The increases in both industrial production and vehicle trips associated with population and business/employment growth will increase the amount of pollutants, thus impacting air quality.

Alternative 1: The No Action Alternative

This alternative would create a potentially much larger area affected by residential air quality impacts. The existing comprehensive plan would encourage further encroachment into lands surrounding the city when the developable vacant land within the city is gone and when land and building costs in the unincorporated area are more favorable. Thus, new trips generated by growth under Alternative 1 would be longer and potentially more polluting.

The additional pollution anticipated from the increased business and industrial activities would be about the same as with the Draft Comprehensive Plan.

Alternative 2: The Strong GMA Regulation Alternative

This alternative would increase the area in which new growth would occur but not as much as the Draft Plan. By concentrating growth primarily within the city limits, vehicle trips would be concentrated in a smaller area, and thus the air quality impacts reduced from that of the other alternatives.

This alternative would encourage increased use of transit and intensification of densities within the city. The total vehicle trips generated would consequently be reduced. Similarly, employment commuting distances would likely be shorter.

The stronger air quality regulations could reduce the rate of pollution. However, stronger regulation on industry and transportation would potentially impact the base of employers as businesses reduce output to comply with pollution standards or move operations elsewhere.

Water

The Draft Comprehensive Plan

Most new residential development will occur in the airport area drainage basin on the west side of town or in the Valley, Peabody, and Ennis Creek basins on the south and east edges of town. Undeveloped lands west and south would likely develop first. When vacant developable land becomes limited, more development of vacant lots or redevelopment of lots between Valley and Whites Creek would follow.

Urbanization will have impacts on water quality. New buildings and paved areas increase the amount of impervious surfaces. In turn, the additional impervious surfaces allow less water to soak into the ground and result in larger quantities of storm water runoff and increase the incidence of stream bank erosion, streambed scouring, and flooding. Runoff rates and volumes are substantially increased by the removal of vegetation.

Surface water impacts would occur from urban storm water runoff, motor vehicles, failing septic systems, and construction. Urban runoff discharged to the creeks and Port Angeles Harbor causes much of the localized water quality problems.

Alternative 1: The No Action Alternative

Continuation of the 1976 Comprehensive Plan would not provide for the level of protection

BUILT ENVIRONMENT

Environmental Hazards

The Draft Comprehensive Plan

Noise: Continuing population growth and development will result in increased noise levels. The major long term sources of noise are from the airport, the mills and vehicle traffic. Short-term noise would occur from construction vehicles and equipment.

The increased development anticipated both north and south of the airport will affect and will be affected by the airport. Development will remove vegetation from large parcels which has acted as a buffer from the noise (and activities) of the airport.

The waterfront location of the mills combined with breezes affects how the noise will carry. As more residential development occurs on or near the bluffs above the mills, there will be noise impacts affecting more people.

Growth anticipated under the Draft Comprehensive Plan, or the alternatives, traffic noise can be expected to increase in all transportation corridors that connect to employment areas. Increased noise levels from higher traffic volumes are intensified in locations where congestion results in stop-and-go traffic, which requires vehicles to drive in low gear.

Alternative 1: The No Action Alternative

Noise: Continued use of the 1976 Plan would not provide enough policy direction to protect residents from noise impacts.

Alternative 2: The Strong GMA Regulation Alternative

Noise: The Strong GMA Regulation Alternative would require that land use planning and development around the airport, near the mills and along heavily traveled roads should have both policy and regulatory limits to protect the public health and safety.

Land and Shoreline Use

The Draft Comprehensive Plan

Land Use: Much of the Draft Plan addresses the required elements under the State's Growth Management Act. While the Draft Plan is broad in its scope and contains substantial improvements over the 1976 Plan, there are a number of areas that may require further effort if the policy intent is to be effective.

The impact of the Draft Comprehensive Plan goals and policies would not be detrimental to the City. The Draft Comprehensive Plan with its 1,289 acres of vacant land would appear to be a necessary step towards assuring that the land base can accommodate the range of projected 20-year demand shown in **Table 8**. The Draft Comprehensive Plan would supply between 201% and 277% of the land needed for residential, commercial and industrial development.

Shoreline: Some of the other policies of the Draft Comprehensive Plan related to protection of the environment and environmentally sensitive areas could also apply to shorelines, although not specifically noted. The shoreline area, which provides the connection to the streams, has not received the same level of environmental attention. As a result, preservation of the shoreline environment is inadequate.

Alternative 1: The No Action Alternative

Land Use: The shift from a "public" to an "open space" designation reflects an effort to focus upon separating those resource lands (critical area) which are important to the natural systems and traditional park facilities (mostly land with little or not structure) from public or quasi-public institution or services (more typically involving structures). This shift would allow for the dispersal of the public or quasi-public facilities into other land use areas within the community as a whole.

This alternative does not address the major land use issue which suggests that the existing totals

preservation. Historic structures are not only affected by their redevelopment, but the development or redevelopment of structures adjacent to historic structures, as well,

The most direct impact on historic and cultural resources is the demolition and replacement by higher economic uses. Future construction could also result in the destruction of sites not yet identified in a historic survey.

Alternative 1: The No Action Alternative

The 1976 Comprehensive Plan offers no policy guidance for the preservation of historic and cultural resources. As such the loss of locally significant structures and sites would likely result, as development increases.

Alternative 2: The Strong GMA Regulation Alternative

The Strong GMA Regulation Alternative would presumably integrate and strengthen county, state and federal regulations for historic and cultural resources in the City. The impact would be positive for the preservation of the resource, but the impact on the individual property owner would likely be greater.

Transportation

The Draft Comprehensive Plan

There are a number of policies that may require additional effort if policy intent is to be effective. Some general transportation improvements needed to accommodate new development resulting from the Draft Comprehensive Plan were identified in the plan, but most remain to be identified in the Capital Facilities Plan element.

Traffic volume forecasts have a strong correlation to population (housing) and employment and are therefore expected to increase by about 1 percent per year with an additional 23,240 new vehicle trips per day as a result of growth in Port Angeles. (See Table 20 of DEIS). If this growth were concentrated in a single corridor, it would translate to the need for a road of 4 to 5 lanes.

A review of these forecasts shows that traffic volumes along SR 101, and particularly along the Front/1st Street corridors, is going to increase to levels that represent between a 35 and 60% increase over today's volumes. In the higher volume corridors (along SR 101, Golf Course Road and 8th Street), these volumes may reach levels that cannot be accommodated by the existing roadway system. In most other areas however, roadway capacities would be sufficient to accommodate volumes. At signalized intersections the limitations of signal time may cause increased delay reduction to below capacity levels.

Traffic forecasts indicate there would be the need for an alternate route to carry traffic through or around the City of Port Angeles. If some alternative is not developed, traffic congestion will reach levels that local traffic will shift to collector and local streets through neighborhoods to reach their destination. This would be most apparent in the summer.

An in-city route may be able to accommodate growth within the 20 year time frame for the Draft Comprehensive Plan but may not be able to serve growth beyond this time period because of the relatively rapid increase in through traffic, particularly recreational traffic.

A cross-town arterial would likely have less impact on the natural environment as compared to a separate bypass located around the south side of the City. The cross-town arterial would, in contrast, have greater impacts on the human environment of the neighborhoods through which it would pass.

Alternative 1: The No Action Alternative

The No Action Alternative or status quo will result in the lowest traffic volume growth related to in-city development because more of the regions growth will sprawl into the County. This option would generate a total of 19,782 vehicle trips per day which is about 8,000 vehicles per day less than the Draft Plan. This comparison is somewhat misleading because there will be development occurring in the county that is included in the boundaries of the area assumed in the Draft Comprehensive plan.

population. If the current ratio of 10.7 acres per 1,000 population is used as the current level of service for park land, then there would be a need for a minimum 52.65 additional acres of park land.

The area currently deficient of park land is clearly on the west side of town. If residential and business growth occurs rapidly in this area, there will be few opportunities for establishing significant new parks and open space within this area.

Alternative 1: The No Action Alternative

Police: The actual development pattern and population levels associated with low density spread-out development will affect police response times and general levels of service. Greater travel distances will lengthen response times.

Fire: Utilizing the existing policies will not in themselves have an impact on fire protection services. If there is no provision for growth to offset increased cost for services, then the impact on fire protection and Medic 1 services will be significant. A dispersed pattern of development could lead to increased response times.

Schools: Unconstrained development of low density units without a defined UGA would place a greater hardship on the school district and the residents. This is because there would be greater costs associated with sprawling low density growth in the areas surrounding the city. Transportation costs would grow because schools would have larger attendance boundaries as density decreases. There is no mechanism in the 1976 Plan for assuring that school space (and teachers) would be available when or where the growth occurs.

Parks and Open Space: The 1976 Comprehensive Plan does not provide policy direction to identify open space as a physical element of the City. The continued use of the 1976 plan policies would impact the City's ability to preserve, enhance or increase open space areas.

Under the No Action Alternative there would be a need for a minimum of 37.03 additional acres of

park land resulting from the anticipated population growth.

Alternative 2: The Strong GMA Regulation Alternative

Police: The increased population will place additional pressure on the police to adequately serve the city. The cost of providing police services may be less for Alternative 2 because the ultimate service area would be smaller than with the Draft Comprehensive Plan or the No Action Alternative.

Fire: The increased population will place additional pressure on the fire and Medic 1 units to adequately serve the city. The cost of providing fire and Medic 1 services may be less for Alternative 2 because the ultimate service area would be smaller than with the Draft Comprehensive Plan or the No Action Alternative.

Requiring that fire and Medic 1 services be available concurrent with development will place added costs on new development. The City may face the difficult task of denying development projects if the fire and Medic 1 services are not available concurrent with new development.

Schools: Alternative 2 would have the least impact on both the school district and residents (tax payers) since new development would have to pay for new school facilities or the development would not be approved. Existing schools may need to be expanded, or new schools built from natural population expansion (births). The new facilities would be built presumably in more urbanized areas where land costs would be higher.

Parks and Open Space: Under the Strong GMA Regulation Alternative, parks and open spaces would not only be identified, but the capital expenditures would be included as part of the Capital Facilities Plan portion of the Comprehensive Plan. Also in accordance with the GMA, the City could consider a system of impact mitigation fee to provide additional park and recreation facilities needed to serve new growth and development. There would be a need for a minimum of 46.39 additional acres of park land.

Alternative 2: The Strong GMA Regulation Alternative

Water: Under the Strong GMA Regulation Alternative the policies would be strengthened to require water service available at the time of development. If water service is not available, it either would have to be improved to supply the development, or the development would be denied. Development of land where water service is not available would be discouraged until the expansion of the water system is complete.

Sewer: There would be an emphasis on increasing density in areas already containing urban utilities. The cost of providing and maintaining this sewer system would be substantially less than the other alternatives.

Additionally, growth and development should be targeted first to those areas which have adequate or excess capacity of water and other urban services. New development would have to bear the cost of providing sewer service, if it is not available (or planned to be available) at the time of development.

Storm Drainage: The Strong GMA Regulation Alternative would provide the greatest levels of protection against storm drainage impacts presumably because a storm drainage utility would have to be functioning and available to serve any new development that may occur. As a result, development would likely be substantially delayed in those areas, where no storm drainage system exists.

There would be an emphasis on increasing density in areas already containing urban utilities, ultimately the cost of installing and maintaining a storm drainage system would be substantially less than the other alternatives.

Solid Waste: The Strong GMA Regulation Alternative would be expected to have stronger regulations for recycling and coordination of the location of regional facilities (such as new landfills). The cost of monthly services to residents and businesses could be more, but the lifetime of the existing landfill would be extended.

Power: The Strong GMA Regulation Alternative would use power availability as one of the criterion to determine concurrency. Similar to the Draft Comprehensive Plan, growth and development would be first focused where excess utility capacity is currently available.

Economic Development

The Draft Comprehensive Plan

This alternative (with its expansion of the land base) is the most favorable for meeting the demand for future projected economic and population growth.

An estimated 2,300 new jobs that would occur as a result of the Draft Comprehensive Plan. (See Appendix 10). Most of the new jobs would occur along the Highway 101 corridor and in the airport industrial park area.

Alternative 1: The No Action Alternative

A continuation of the Goal and objective contained in the 1976 Plan would not have a significant impact.

An estimated 1,620 new jobs that would be created by the year 2012 from continuing to use the 1976 Comprehensive Plan.

Alternative 2: The Strong GMA Regulation Alternative

An estimated 2,030 new jobs that would be created by the year 2012 by the Strong GMA Regulation Alternative. This alternative would allow some new economic development within the urban growth area. Commercial growth would not be unduly constrained.

converted to commercial, multifamily, and open space land use categories.

- o The City should through policy or by technical reference identify a target land supply factor (i.e. 150% or 200%).
- o Airport Area. Work cooperatively with the Port of Port Angeles and the County to develop a specific policy (or policies) regarding future land use and limitations in an around the airport.

Potential Mitigation Measures

- o Refined Data Needs for UGA's. Work cooperatively with the County to define past rates of growth for single family, multifamily, commercial and industrial categories for the Urban Growth Areas. Also to work cooperatively with the County to gather data on the amounts of developed vs. vacant land for the designated Urban Growth Areas (Subareas D, G, and H).
- o The City may want to consider a policy (or policies) which allow for a density increase (residential and non-residential) where there is substantial over-capacity in the existing infrastructure (public services, streets, utilities, etc).
- o Identify or otherwise establish sub-components of planning areas such as delineation of the traditional downtown waterfront area, US 101 View corridor through the City, gateway (major locations to the City, Airport Impact Zone, and potential linkage corridors (trails, etc.) to existing and funded recreation facilities.
- o The waterfront portions of the City contain predominantly three types of land use: industrial, Commercial and open space. Because of its importance economically and visually, the City may want to provide detailed policies that acknowledge the waterfront's importance and the need for the use of good design principles in any development or re-development of the area. At minimum, a policy on the use, type, and spacing of

trees along this area would help its image greatly.

- o Because of the increase in tourism to Port Angeles and its increasing importance to the economy, the City may want to add a policy (or policies) which define the boundaries of the waterfront area.
- o Although much of the Plan indicates that the face of the bluff be preserved in open space, this is not possible in all areas. Since some development or redevelopment will occur at the edge of the bluff, the City may want to consider developing a policy (or policies) that acknowledge the importance of these areas (as they are viewed by residents and tourists alike) and encourage the use of good design principles in their development. The policy (or policies) should support the use of construction techniques that protect public safety and preserve scenic views.
- o Because of the City's topography, much of the current vacant and/or under-developed parcels (containing dwelling units) involve land with abrupt grade changes. Many of these parcels work well for residential uses, however, any attempt to convert the parcel to a commercial development with it's parking requirements may necessitate substantial re-contouring of the property for street grade access. To minimize this situation, a policy which encourages an access route with less disruption to the land contours may be desirable.
- o Since the rate of growth for this housing type was 4 times that of single family (although the total volume is small) and the projections for the housing mix in 2012 shows about 4 percent for mobile homes, the City could consider developing a policy (policies) which define what "quality" means in this context.
- o The City could work cooperatively with County (Assessor's Office, Planning Department), Port Of Port Angeles, Chamber of Commerce, ... to establish a

only reduce automobile travel but could enhance the City's ability to secure funding, such as federal funding under ISTEA.

- o Road improvements should include some accommodation for pedestrians and non-motorized transportation, even in residential areas. Pedestrian facilities design should be appropriate for the safety, volume and character of non-motorized/pedestrian traffic in each neighborhood or planning area.
- o High priority should be given to High Occupancy Vehicle (HOV) improvements, in addition to encouragement of traffic operations improvements. These may take the form of queue by-pass lanes at congested intersections, or other traditional transit improvements or, in the case of Port Angeles, would be improvements that cater to tourists, the majority of whom travel in automobiles with two or more occupants. Concurrency requirements for development and redevelopment should support transit improvements, as well as, road improvements (e.g. bus shelter, space or construction of bus turn-out).
- o As developable land becomes more scarce, there will need to be increased emphasis on shared and joint use parking. Thus, other commercial, retail, office, and residential uses should be encouraged to develop joint and shared use parking, particularly those that have compatible hours of operation like lodging (night demand) and retail/commercial (day demand). In the downtown core consider development of public parking that is funded in whole or in part by fees that are in lieu of providing parking for each business individually.
- o A staged implementation of a by-pass may be more appropriate. The staging could be as follows:
 1. The study funded to evaluate options for easterly access in the vicinity of Golf Course Road should be implemented

immediately and that some option for a secondary access to the east be initiated.

The first phase could also involve Traffic System Management (TSM) options that focus on modifications to the existing street system to increase capacity. Examples include:

- a. Remove parking at controlled intersections to provide auxiliary turn lanes to increase capacity;
- b. Remove parking during selected periods of the day (i.e. noon and PM peak hour) to create additional through land capacity;
- c. Modify signal timing to respond to seasonal an/or daily peak traffic periods to favor major flows and expand the number of signals that are coordinated as part of a system.

2. Pursue funding and construction of an urban cross-town route.
3. Pursue development of a by-pass like the one that has been discussed south of the City in the vicinity of Scribner. Initiate studies to define a preferred corridor, so designation or reservation of right-of-way can be established before new development preclude the feasibility of such an option. The need to construct the actual by-pass appears to be at or beyond the year 2012.
4. Ultimately a separate by-pass should be constructed.

- o Improvements will be required to 8th Street since it is one of the only east-west

dedication, fees-in-lieu-of payments and land trades).

- o Include in or refer to the Comprehensive Park and Recreation Plan as a part of the Port Angeles Comprehensive Plan.

Potential Mitigation Measure

- o Target an area and begin inquiries into the acquisition of park land at the western edge of the city, to prepare for anticipated development.

Utility Services

Water:

- o Following a phased approach for implementing improvements to assure adequate water supply is financially feasible.
- o New residential, commercial, and industrial development should be required to utilize water saving devices (and systems). New development should be designed to reduce fire flow requirements.

Sewer:

- o The Comprehensive Sewer Plan should be coordinated with the land use element of the Comprehensive Plan to assure that facilities are in place as growth occurs.
- o Development in currently unsewered areas may need to be phased in order to provide concurrent sewer service.

Storm Drainage:

- o Include storm water utility as one of the identified utility services, that is to be consistent with the Comprehensive Plan, concurrent with development.

Potential Mitigation Measure

- o Identify policies or programs which will educate the public on non-point pollution from urban storm water runoff.

Solid Waste:

- o Recycling programs should be used to extend the useful life of the existing landfill.

Potential Mitigation Measure

- o The City should coordinate with Clallam County and the Port of Port Angeles for the possible use of the wood waste disposal site for wood waste generated by new development.

Power:

- o Because the city controls the local power company, include power facilities within the capital facilities plan. This is so that the location, phasing and costs will be coordinated with the other essential utilities also provided by the City of Port Angeles.

Potential Mitigation Measure

- o Identify specific areas on a map where power capacity is very low. Utilize this to map to monitor the status of capacity as new development projects are proposed.

Economic Development

- o Provide additional direction within the Comprehensive Plan to continue to define the intended economic role for the City of Port Angeles.

Potential Mitigating Measures.

- o Work cooperatively with Clallam County to assess the economic impacts of a Transfer of Development Rights program.

Public Services

Police: Increased development and population growth will increase the demand for additional personnel and equipment by the City of Port Angeles.

Fire: Increased development and population growth will increase the demand for fire protection and Medic 1 services.

Schools: With the enrollment forecast to increase at 1.5% per year, the growth in the student population will outpace the general population growth. Continued growth and development will place facilities at or over capacity.

Parks and Open Space: Future population growth will place increased demands on existing parks and recreational facilities and programs and will contribute to the demand for additional parks and recreation programs. Future development in the city will result in a net loss of land that could serve as open space.

Utility Services

Water: The growth and development will increase consumptive uses and place increased demands on the existing water sources and facilities. Increased demand will lead to increases in the cost of future water development.

Sewer: Population growth and development will place additional demands on the City of Port Angeles sewage system.

Storm Drainage: Storm water runoff will increase with the addition of development and impervious surfaces.

Solid Waste: There will be increased quantities of solid wastes as a result of population growth. Additional wastes will require increased handling capacity on the part of refuse collectors as well as increased costs at the landfill.

Power: Growth and development will continue to utilize more power to serve new homes and businesses.

Economic Development

The economic base for Port Angeles will likely continue to shift away from natural resource (timber and wood products) industries given the current regulations and markets.

CHAPTER II.

DESCRIPTION OF THE PROPOSAL AND ALTERNATIVES

A. DESCRIPTION OF THE DRAFT COMPREHENSIVE PLAN

The Proposed Action - Port Angeles Draft Comprehensive Plan is to adopt the recommendations of the Growth Management Advisory Committee and Planning Commission by October 19, 1993. The Comprehensive Plan has been developed to meet the requirements of the Growth Management Act. The Comprehensive Plan is the basis upon which all City development decisions are to be made. It establishes the City's goals and policies that set the direction of the City for the next two decades. The Plan serves as the top of a pyramid which all other city ordinances, regulations and plans must be consistent with and support.

The Comprehensive Plan is organized as a series of "elements" and includes an introduction, a definition section and various appendices. The Growth Management Act requires that each comprehensive plan contain a land use element, a transportation element, a housing element, a utilities element, and a capital facilities element. This plan contains each of the required elements as well as three additional elements: a growth management element, a conservation element and an economic development element.

To achieve these goals, the Comprehensive Plan uses two new growth management tools:

- o Designating a municipal urban growth boundary, and
- o Providing standards for concurrency.

The Plan covers approximately 6,100 acres currently located inside the City of Port Angeles and an additional 3,500 acres of "Urban Growth Area," which is currently in unincorporated Clallam County (See Figure 2). This "urban growth area" is to provide undeveloped land for future urban growth over the 20 year period of the Plan. For purposes of providing analysis of the urban growth area, the land use designation for the area outside the City was assumed to follow the existing Clallam County zoning map.

The Draft Comprehensive Plan decreases the amount of land identified for low and high density residential development and increases the land identified for medium density residential development, commercial development and open space within the existing City limits. The Plan also adds large areas for development of low density residential, commercial, industrial and open space land uses.

B. ALTERNATIVES TO THE PROPOSED ACTION

Alternative 1: The No Action Alternative

The Null Alternative would be to re-adopt the existing 1976 Comprehensive Plan without regard to consistency with the Growth Management Act requirements. Alternative 1 is simply a continuation of the City's current land use policies and development pattern. The existing Comprehensive Plan is more a policy plan than a land use map plan. An advantage for the policy plan is to allow for adaptability of the plan to changing conditions. By defining the direction and character of development, the policy plan serves as a guide in municipal decision-making.

The five basic goals under which the 1976 Plan was developed are:

A circulation system which serves all of the city and all types of users in the most economic, efficient and compatible manner possible.

A local economy which is stable and provides employment opportunities for all workers and improves the standard of living of the community as a whole.

A community where development and use of land are done in a manner that is compatible with the environment, the characteristics of the use and users.

The provision of community facilities which meet the needs of the people of all areas of the city and enhance the character and quality of all areas of the city.

A community of viable neighborhoods and a variety of opportunities for personal interaction, fulfillment and enjoyment, attractive to people of all ages, characteristics and interests.

To implement these goals, this Comprehensive Plan provides specific policies in each of the following areas: residential land use, commercial land use, industrial land use, open space land use, parks and recreational land use, circulation, annexation, community facilities and services, social and urban design. The policies and not a map serve as the primary guide for the Plan. The current zoning that has been implemented, in conformance with the Comprehensive Plan policies, will be translated into land use categories for evaluation of the 1976 Plan (See Figure 3). The 1992 map serves as a indication of the land use for the existing 1976 Comprehensive Plan.

The existing Comprehensive Plan map did not identify a limit of the "urban growth area" but did show the extent of planning land use designations beyond the City limits. The area currently within the City limits is under the jurisdiction of the City, and the area immediately adjacent to Port Angeles is considered a potential Urban Growth Area of Clallam County, since there is no jurisdictional review for the City.

Alternative 2: The Strong Growth Management Act Regulation Alternative

This alternative uses primarily the existing City of Port Angeles boundary, and only adds approximately 2,030 acres east of the City limits as the "Urban Growth Area." Under this alternative, the land use designations within the City would be the same. The land uses designated for the "urban growth area" outside the City are presumed to follow the existing Clallam County zoning map, interpreted into land use categories.

The policies would be much the same as the proposed Draft Comprehensive Plan, except there would be maximum use of local discretion to implement the goals and policies in conformance with the Growth Management Act. The intent is that the policies and land use plan would be revised to minimize the costs of new development on existing City taxpayers by controlling the timing and location of new public infrastructure. The policy changes would include:

- o Land use in existing neighborhoods and commercial areas would be intensified. Vacant land would be expected to develop first, assuming it is less costly to obtain than land already developed. Redevelopment would occur as land becomes more scarce. The density in the area between 2nd and 8th Streets and Cherry and Laurel would be expected to intensify from predominantly low density single family to predominantly multi-family.
- o New development would be targeted to areas with excess utility capacity. These areas include:
 1. North of Lauridsen Blvd.
 2. East of "I" Street
 3. West of Ennis Street
- o Some of the language in the policies would change from "should" to "shall".
- o Traffic congestion level of service standards would be established rather than just road standards as the LOS concurrency requirements.
- o Concurrency standards would be enforced. New development would be expected to pay for the impacts on facilities and services. If new development cannot meet or provide for the high levels of service, then it would be denied. Capital facilities requiring concurrency would include all urban services not just transportation, water supply and subdivision related improvements.
- o A Highway 101 bypass would be developed to follow Scribner (Scrivner) Road at the south edge of town. It would branch away from existing Highway 101 east of Morse Canyon and west of Tumwater Canyon.

By limiting the Urban Growth Area, future urban development would maximize land utilization by directing new uses to areas which are vacant, underutilized or in transition within the City limits now and to areas with excessive infrastructure capacity. Such compact, in-fill type development would reduce the need for new infrastructure and increase the use of existing infrastructure in a cost-efficient manner. The property values of existing land owners in the City could substantially increase.

The intent of the Strong GMA Regulation Alternative to reduce the need for infrastructure improvements that increase land costs for new development and to require new development to pay for more of the needed infrastructure capacity with less of the expense shared by existing development. With new development paying more of the costs of standard infrastructure at the time of development, it could be expected that growth would be slowed or that more expensive new development could be encouraged through a process called gentrification.

The Environmental Impact Statement on the Comprehensive Plan is the initial part of a phased SEPA review for future development that implements the adopted policies. It is intended that projects which are consistent with the Comprehensive Plan policies and land use designations may rely on much of the land use impact analysis that remains timely and forego detailed study of these issues under the use of existing environmental documents provision and subsequent scoping process. It is also expected that future development projects will require detailed study of project specific impacts that cannot be analyzed in a programmatic study.

CHAPTER III.
RESPONSE TO COMMENT LETTERS AND TESTIMONY

A. COMMENT LETTERS

1. Port Angeles Public Works
2. Clallam County Commissioners Office
3. Department of Ecology (Environmental Review Section)
4. Department of Ecology (Shorelands Growth Management Project)
5. Clallam County Historical Society
6. Carl Alexander
7. Chris Muir

B. PUBLIC HEARING TESTIMONY

1. John Pope
2. Norma Harkins
3. Doris Doyle
4. Margaret Crawford
5. David Stalheim
6. Chris Muir

be deleted from policy B13. The issue of combined sewer overflow reduction is addressed in the Wastewater Facility Plan and may not be needed here.

The following are comments are made by the Public Works Department based upon the March 8, 1993 Draft Environmental Impact Statement of the Port Angeles Comprehensive Plan:

- 1 Page I-9, second paragraph. The current level of effort relating to the issue of concurrency through the Capital Facility Committee has establish in draft that the only element that we have concurrency status will be transportation, subject to City Council approval.
- 2 Page I-12, first paragraph in "Population and Housing". The paragraph is repeated.
- 3 Page I-20, sixth paragraph on left. I believe that the reference to the downtown has been changed to traditional rather than historical.
- 4 Page I-20, third paragraph in "Transportation". We must assume that secondary and primary arterials means all arterials (principal, minor, and collector).
- 5 Page I-22, areas referring to staging of by-pass. Without more detailed traffic engineering it is very presumptuous to say what the staging of a by-pass should consist of. The items listed are traffic management strategies accepted in the industry to reduce traffic volumes and/or improve traffic movement.
- 6 Page II-10, second paragraph. The City of Port Angeles does not have to apply for an NPDES permit to control stormwater, since our population is less than 100,000. We are however, in the area covered by the PSWQMP as stated in paragraph one.
- 7 Page II-65, second paragraph from bottom. The area referred to in the paragraph is not defined. I assume that it is referring to the waterfront area.
- 8 Page II-65, last paragraph. There should be more emphasis on the protection of the bluff areas in the City. These areas are subject to continuous weathering and erosion. Policies establishing setbacks and construction techniques should be considered for the protection of public and preservation of the scenic viewpoints.
- 9 Page II-73, Table 16. The projected increase in single family dwelling units over the twenty year period is 58 units per year. This figure is supported by Building Division records for the last three years. 1990 - 66 units; 1991 - 94 units; and 1992 - 62 units.
- 10 Page II-85, Figure 21. This figure does not represent the complete Statewide National Functional Classification System Map. A copy of that map is attached for reference. The most obvious difference is that Blvd by the airport is not a principal arterial. It is a minor arterial and it is continuous to the Truck Route or SR 117. I assume that the layout shown in the figure is for the purpose of the Comp. Plan. The classifications have

not been analyzed in detail or submitted to the state for reclassification of the current map.

- 10 11. Page II-86, third paragraph. The City has ordinances dealing with road improvement standards for short and long plats and does require that the primary frontage street to a development be improved with curb and gutter and sidewalk, on arterials and on adopted school walking routes.
- 11 12. Page II-100, bottom of page. Same comment as in item 5 above.
- 12 13. Page II-133, third paragraph. The City is not close to implementing a stormwater utility. The stormwater management plan to be conducted in 1993 will provide necessary information for the City Council to consider the formation of such a utility.
- 13 14. Page II-134, third paragraph. Stormwater services should not be included as a utility that is concurrent with development. Stormwater services can be considered for concurrency, as necessary.

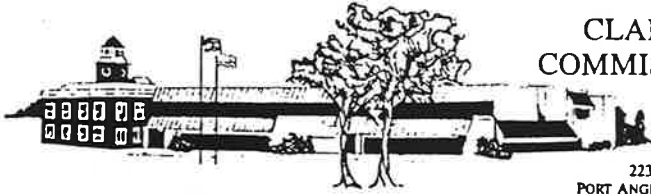
Thank you for the opportunity to comment.

JNP:jnp
 attachment
 Jack\COMPDEIS.REV
 copies:

**Response to:
Port Angeles Public Works Memorandum**

1. Page I-9, second paragraph, does not discuss concurrency. Your comment indicates that the City of Port Angeles Capital Facilities Committee is viewing transportation as the only service or facility subject to concurrency. The policies under the Growth Management Chapter of the Draft Comprehensive Plan define Urban Services and then identify that "Urban services/facilities required to meet the needs of new development shall be provided, or shall be planned to be available within six years, to meet the levels of services established for such service." The policies indicate that more than just the needed transportation facilities should be required concurrent with new development.
2. The repeated paragraph has been noted in the Errata Sheet contained in this Final EIS. The reference to "historical downtown waterfront" has been noted in the Errata Sheet.
3. Yes.
4. The mitigation has been corrected from "should" to "could" on the Errata Sheet. The mitigation was intended to provide a framework for approaching staged implementation of a bypass, not necessarily a work program. You are correct that further detailed engineering analysis will be needed.
5. Comment acknowledged.
6. Yes the area referred to is the waterfront area. This correction has been noted on the Errata Sheet.
7. Comments acknowledged. The protection of bluff areas subject to continuous weathering and erosion has been added to this mitigation measure in the revised Summary in this Final EIS.
8. Your support for the projection of 58 single family units per year that are expected within the existing Port Angeles city limits, based on records of the past three years is acknowledged. The population and housing projections were derived from viewing a variety of trends that included the building permit records from 1990 through 1992.
9. A revised Figure 21 is included with the Errata Sheet. The Figure should reflect what are the current road classifications and not the anticipated classification changes.
10. Thank you for that clarification. For development that does not require a long or short plat, the standards for improvements have not been specifically identified by ordinance or code. Road mitigation for new development has been applied based on the specific circumstances of the project location and existing frontage conditions of the road(s) serving the development.
11. Comment acknowledged.
12. This is an important correction and has been noted in the Errata Sheet.
13. Comment noted. However, the policies under the Growth Management Chapter of the Draft Comprehensive Plan define storm water systems as one of the urban services and then identify that "Urban services/facilities required to meet the needs of new development shall be provided, or shall be planned to be available within six years, to meet the levels of services established for such service." The determination of whether

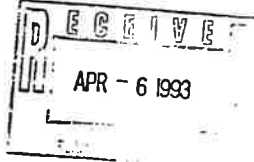
CLALLAM COUNTY COMMISSIONERS' OFFICE



COURTHOUSE
223 EAST FOURTH STREET
PORT ANGELES, WASHINGTON 98362-3098

(206) 452-7831, EXT. 233
SCAN 575-1234

JIM RUMPELTES, ADMINISTRATOR



BOARD OF COUNTY COMMISSIONERS

DAVE CAMERON, DISTRICT I
DOROTHY DUNCAN, DISTRICT II
LAWRENCE GAYDESKI, DISTRICT III

April 5, 1993

Port Angeles City Council Members
321 E. Fifth Street
Port Angeles, WA 98362

Dear Mayor Hallett:

Clallam County has reviewed the Port Angeles Comprehensive Plan and Draft Environmental Impact Statement. The following comments are provided for the City Council and represent Clallam County's concerns regarding these two products.

OVERVIEW

The City of Port Angeles Comprehensive Plan consists of seven elements (subject areas) which contain policies which guide decision-making in each subject area addressed by the plan. The Plan also includes a land use map showing the general distribution of land uses throughout the city. The Capital Facilities section of the plan is still being developed and is not yet available for review. The City has prepared a draft environmental impact statement which evaluates the draft plan and compares it to two other alternatives. The draft plan opts for a large urban growth area whereas one alternative evaluated looks at a small urban growth area. A third alternative would involve use of the existing City comprehensive plan to guide growth which would limit urban developments to the city limits and allow low density developments outside the city.

The City has done a nice job of putting together a coherent set of policies. These policies will provide decision-makers with excellent guidance in the future. County review will focus on areas that should be addressed in the City's plan but have not yet been addressed. The plan will be evaluated against the requirements of the Growth Management Act, the State Procedural Criteria and the criteria for state review of local plans as outlined by the various state agencies involved in plan review. Comments in this review should not be viewed as criticism of the City plan but rather as a set of constructive suggestions.

OVERALL DESIGN

The Procedural Criteria were adopted by the State Department of Community Development in October of 1992. The Procedural Criteria set out many of the requirements for a GMA comprehensive plan. Under the Recommendations for Overall Design section it is suggested that the plan should clearly identify how the applicable County-wide Planning Policies are integrated into the plan. This would be a useful section in the Port Angeles plan and would highlight some of the following policies adopted by the City in the County-wide:

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April 5, 1993

Planning Policy which have been left out of the Comprehensive Plan or have been rewritten so that they now are in conflict with the County-wide Planning Policy.

Urban Growth Areas

Although the City included a policy covering use of the 20 year population forecast for the county in establishing a minimum size for an urban growth area (Growth Management Policy #2) the City's environmental impact statement clearly ignores the 20 year population forecast of the County-wide Planning Policy in favor of an estimate which uses the last five years growth in the city and projects it 20 years into the future. The growth projections in the County-wide Planning Policy are based on four decades of population data and are much more likely to provide accurate projections of future growth than any five year trend. Use of this methodology results in a gross overestimation of the planning population for the City, which results in a land use demand analysis and traffic forecast that is contrary to sound planning principles.

Growth Management Policy #7 indicates that the City should recognize a density of one unit per acre as the demarcation between urban/suburban for the purposes of establishing or amending the urban growth area. This policy conflicts with County-wide Planning Policy #4 which states that the current County Comprehensive Plan identifies a density exceeding one unit per acre as urban/suburban. This is a critical distinction as there are large acreages of 1 acre rural zoning on the margins of urban growth areas. The City Comprehensive Plan Policy as it is written would indicate that any land zoned at one acre density would be a likely candidate for inclusion in the Port Angeles Urban Growth Area. This policy should be changed to be in line with the adopted County-wide Planning Policy.

Urban Growth Area Policy #5 which addresses increases in net density over time in the UGA is not well covered by policy in the City Comprehensive Plan.

Growth Management Policy #13 states that urban services/facilities should be provided and constructed to meet design and construction standards of the City. The County-wide Planning Policy however recognizes that the City may not be the ultimate service provider in all areas of the City and that facilities and services should meet the construction standards of the ultimate service provider. City policy should be changed to reflect the County-wide Planning Policy language.

The Growth Management Policies should include a policy which addresses future compliance with the watershed management plan for the Port Angeles watershed.

Housing

The County-wide Planning Policy contained policies which would support the establishment of a Transfer of Development Rights program. The cities agreed to locate density receiving areas inside the urban growth area.

The County-wide Planning Policy contained policies for providing density incentives to developers of low income housing.

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An analysis of the capacity needs for various utilities to serve the increased population over the planning period.

A map showing the proposed location of utilities needed to serve future growth.

TRANSPORTATION ELEMENT

Clallam County is very concerned with the designation of any alternative routes for Highway 101 without a joint planning process between the County and City. The Draft EIS indicates that the 2012 forecast for traffic volume on SR 101 on the east end of town is 44,400 ADT. If this is anywhere near accurate, it is quite obvious that solutions other than a cross town route is needed. First, however, the County and City must agree on traffic forecasts. Second, the County and City must jointly agree on solutions to that traffic forecast. The proposed cross town route is not the solution in itself to the traffic forecast outlined in the EIS.

What are the land use assumptions used in estimating future traffic volumes? What future traffic volumes are expected? The Draft EIS, by using inflated population estimates, is also inflating the traffic forecast. This is not adequately address in either the Plan or the EIS though traffic demand analysis.

What level of service standards have been adopted for various categories of roadway and transportation systems?

What facilities fail to meet standards and what actions would be required to bring them to standard?

A ten year traffic forecast based on the land use plan should be in the plan. A 20 year projection is found in the EIS. Will this information be incorporated into the plan?

What are the system expansion needs? Where are the improvements located?

The comprehensive plan should identify the improvements needed and discuss how they will be financed.

The comprehensive plan should contain policies which provide for adjustments to the land use plan if transportation financing falls short or if concurrency cannot be achieved.

The transportation plan should address the impacts of transportation improvements on adjacent jurisdictions.

ENVIRONMENTAL IMPACT STATEMENT

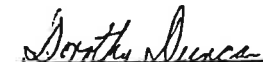
The environmental impact statement contains much of the background information that should be incorporated into the comprehensive plan. The analysis of the alternatives to the draft plan are good. The primary problem with the Draft EIS is the over-estimation of population growth for the City and the over-estimation of land consumption for the various categories of land use. The EIS makes the assumption that the City will grow by .88% per year over the next 20 years while in reality the City grew by only .23% per year in the 1980's and .56% in the 1970's. This assumption is carried through all of the analysis of alternatives and results in an overestimation of land use demand and traffic volumes.

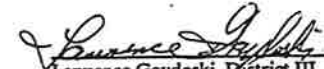
Port Angeles Comprehensive Plan/EIS Review
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The EIS also points out many of the deficiencies of the plan as far as content. These limitations in the area of economic development are covered at some length on page 148. The Port Angeles Comprehensive Plan could be improved by addressing the deficiencies pointed out in the EIS and in this review and by inserting some of the excellent background information and analysis from the EIS into the comprehensive plan.

We hope this review will be useful to the City and can be used to improve the City's Comprehensive Plan.

Board of Clallam County Commissioners


Dorothy Duncan, District II


Lawrence Gaydeski, District III

Various land consumption scenarios were explored in the Draft EIS. Based on the information available and analysis completed, the County's population and housing projections provided a base for the minimum amount of land to be consumed.

4. Yes, the Draft EIS does identify 44,000 average daily vehicle trips for the year 2012 on Highway 101 at the east edge of Port Angeles. This forecast is a reflection of more than just the anticipated population and housing increase. It also reflects the clear trend toward increased tourism and growth in retail sales. These two trends translate into additional vehicle trip that are independent of the anticipated population increase.

It may be important to note that the 44,000 average daily trips reflect a worse case condition for traffic (reflecting the summer periods) when tourism traffic is greatest. The Draft EIS notes that "Volumes on SR 101 can decrease by as much as 40% from summer to winter. This appears to be reflective of increased tourist and logging activity during the spring and summer months."

5. The 10 year (year 2002) forecast was not included in the EIS. A 10-year forecast would have been helpful, however, there were limited resources available to analyze the impacts of the comprehensive plan. Thus, the scope of the analysis focused on the long term vision of the plan.
6. We acknowledge that the population growth of Port Angeles has been very low when viewed over the last 20 years. The EIS is not intended to be a validation of one assumption over another. It does describe a variety of trends and includes a range of impacts where possible. Certainly, the trends of the past five years are no guarantee of the future. However, there seems to be growing evidence that a higher range of population growth may occur over the next 20 years.

This is evidenced by the Office of Financial Management (OFM) estimates of population for Clallam County (as a whole). The OFM estimates for Clallam County in the year 2012 have already been exceeded in 1992. Table 1 of the Clallam County County-wide Planning Policy OFM projections from January 31, 1992 identified the County's projected population in 2012 would be 59,312. However, as of mid 1992 the OFM estimated 1992 population for Clallam County was already 60,000.

There are different circumstances affecting Port Angeles population growth, that were not present 10 years ago. One of these trends is the "snowbird" population, which is retired residents that spend their winters in warmer climates and return to Port Angeles during the spring and summer. Another trend is a working population that is connected to an office electronically or work elsewhere for days or weeks at a time and return to Port Angeles during time off.

Economic changes (i.e. mill closure) in Port Angeles would reduce the affect of population increases. Economic dislocation of industry would result in a population change. However, it may be that the County population forecasts can reflect a very slow growth period, which would serve well for the low end of a range. Until the Clallam County Cities and Clallam County have adopted strong GMA regulations and agreed to a lower population limitation, it would seem appropriate to identify the worst case analysis of probable significant adverse environmental impacts that would result from growth under the three alternatives defined in the Draft EIS.

See also Response #4. that explains the assumptions used in preparing the traffic volumes forecast.



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

April 5, 1993

Mr. Brad Collins
City of Port Angeles
321 East Fifth
Port Angeles, WA 98362

Dear Mr. Collins:

Thank you for the opportunity to comment on the draft environmental impact statement (DEIS) for the City of Port Angeles' Draft Comprehensive Plan. We reviewed the DEIS and have the following comments.

We commend the city for proposing to adopt a comprehensive plan that consists of many well thought out goals and policies and includes a variety of wetland protection provisions which are consistent with our recommendations for comprehensive plans. We notice, however, that a few of the components we recommend have not been included in the city's proposed plan. For example, the city might consider including more non-regulatory wetland protection program components in its wetland protection strategy.

We recommend that all jurisdictions consider including the following components in their comprehensive plans to address wetlands:

Goals, objectives, and/or policies under appropriate plan elements (such as the Land Use Element, a Conservation Element, or an Environmental Protection Element) that will be consistent with the "Environment" and "Recreation and Open Space" goals and wetland protection requirements of the GMA, and will provide a firm policy basis for final development regulations that will protect wetlands and their buffer areas. These should include:

- An overall wetland protection goal, objective, or policy such as: "maintain the quantity and quality of wetlands within the jurisdiction (i.e., losses offset by gains) in the short-term, and increase the quality and quantity of the jurisdiction's wetlands resource base in the long-term"
- Policies which encourage wetlands planning and management, especially as part of the watershed, since wetlands are not isolated units but ecosystems that may be affected by on-site and off-site activities; and
- Policies that protect wetlands based on their functions and values;

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Mr. Brad Collins
April 5, 1993
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• A clear factual basis for all policies relating to the protection of wetlands, including wetlands inventory data and maps where possible. Wetlands inventory data and maps if available, should be referenced as support for policies;

• A land use map with a critical areas overlay that includes all known wetlands to show where any wetland protection provisions will apply. The basic land use map should also show planned open space areas, which should include at least all high quality wetlands and any areas where wetlands may be restored, created, or enhanced to compensate for any unavoidable wetland impacts that may be permitted elsewhere;

• A strategy that outlines the actions that will be taken to implement the wetlands policies. The strategy should use innovative land use management techniques as called for in WAC 365-195-040(2)(h), and it should include the development of inventories and maps, the adoption of new or revised regulations, and the development of non-regulatory wetland protection measures such as education, restoration, and acquisition. The strategy should also stress coordination with adjacent jurisdictions; and

• Urban growth boundaries that avoid urban expansion into large wetland areas, and include enough area, or better yet, provide for higher urban densities to ensure that the functions and values of wetlands within the urban growth area will be maintained while accommodating the projected growth.

1 | The DEIS appropriately acknowledges that the city's proposed comprehensive plan and existing ordinances may not adequately protect the city's wetlands, because the wetlands may be impacted by stormwater from developments higher than the watershed. It may, therefore, be appropriate for the city to consider working with the county to develop and implement a stormwater management program that will mitigate such impacts. The city should discuss such potential mitigation in the EIS.

Ecology is prepared to assist local governments in developing a wetlands protection strategy that meets local needs and the requirements of the Growth Management Act. Assistance is available in the form of written materials, education, training, and development or review of wetland protection plans.

Regarding the section of flooding, you may want to consider strengthening land use controls to limit development in the floodplain or flood prone areas.

2 | Alternative 2, The Strong GMA Regulation Alternative, should include mention of stormwater retention "ponds" in areas of non-development as part of the new stormwater drainage system.

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**Response to:
Department of Ecology
Environmental Review Section**

1. The City and Clallam County have recently received a grant to plan for the implementation of a storm water management program. The refinement and feasibility of such a program have yet to be completed. The existing policy that states: "

"The City shall develop and implement a plan to improve water quality which includes measures to reduce and minimize storm water pollutants and combined sewer overflow pollutant discharges."

Cooperative work on such a plan has been initiated. Thus, this policy is essentially mitigation for existing and future storm water pollution and, as such, does not require mitigation.

2. The use of regional storm water retention ponds in areas of non-development would be considered as a type of measure anticipated under the Strong Growth Management Alternative.

The State developed "best management practices" for storm water discharges could be used to guide the preparation of a storm water management program for Port Angeles. Port Angeles has adopted a clearing and grading ordinance that uses the State's retention/detention best management practices. Additionally, Port Angeles is required to use (by July 1994) the State manual or a technical equivalent to meet the requirements of the Puget Sound Water Quality Management Plan.

**Response to:
Department of Ecology
Shorelands Growth Management Project**

1. Thank-you for your comment. The current version of the Draft Comprehensive Plan Goals and Policies is included in **Appendix B**.
2. Comment acknowledged, and the list suggested language will be considered when revisions to the Shoreline Master Program are initiated.
3. Comment acknowledged. The Environmentally Sensitive Areas Protection Ordinance includes marine bluffs, beaches and associated coastal drift processes as two of the protected "locally unique features". The shoreline areas included in the Environmentally Sensitive Areas Protection Ordinance currently support your suggestion that the City "classify selected shoreline sections as critical area". There appears to be environmentally features identified in nearly all of the shoreline areas.

The Shoreline Plan has not been revisited, but will be as part of Shoreline Master Program update.

4. It is not clear to the City how the open space requirements of the Growth Management Act are implemented. The City has historically designated public open space land for PBP (Public Building and Parks) zoning which limited uses in many of the shoreline areas. The low intensity (PBP) zoning results in preservation of much open space in those shoreline areas.

No open space program has been identified in the Draft Comprehensive Plan. The Comprehensive Plan provides only policies for the preservation of open space. Actual implementation of the policies for both open space and shoreline areas may be addressed in development regulation revisions that will follow the adoption of Comprehensive Plan.

In the current Shoreline Master Program, the area outside of the City (in the Urban Growth Area) is not analyzed. The Urban Growth Area will be part of the Shoreline Master Program update once the Urban Growth Area boundary is finalized.

**Response to:
Clallam County Historical Society**

1. The comments and policy suggestions are acknowledged. We agree that designating a historic district would be difficult. The policies, as currently drafted, do not designate a historic district, but may set a process for future designation of a historic district and/or individual historic buildings.
2. Your corrections and additions to the registered historic structures have been noted, and corrections have been included in the Errata Sheet.

**Response to:
Carl Alexander**

[Note: The Carl Alexander letter dated May 17, 1993, replaces his earlier comments received within the 30 day comment period for the DEIS.]

1. This correction has been noted on the Errata Sheet.
2. This correction has been noted on the Errata Sheet.
3. You are correct, the calculation of park space needed for the anticipated population growth was based on 1.7 acres per 1,000 population when it should have been based on 10.7 acres per 1,000 population. The corrections for the park land needed have been noted on the Errata Sheet. Thank you for your comment.
4. The Water Comprehensive Plan and the Capital Facilities Element should address water source and reliability of the supply. However, the issue you raise merits some preliminary discussion in this EIS. Contained in **Appendix C** is a paper prepared by Mr. Jack Pittis, P.E. for the American Water Works Association Conference. This paper describes the water quality impacts of the Elwha Dam removal.
5. The FAA has stated that the City of Port Angeles has five years more to operate the landfill from the beginning of 1993. This means that the City of Port Angeles will not be able to use the full life of the facility, which is until about 2011 depending on amounts of municipal solid waste.

The City has taken two separate approaches to the problem. First, they plan on hiring a bird expert to provide a report and study of the bird activities around the landfill and the potential risk to the airport. Second, they have hired a consultant to assist in reviewing the alternatives available for disposal so that the Solid Waste Comprehensive Plan can be updated as needed to allow for alternative disposal technologies. Those include the following:

- a. Use of the current landfill;
 - b. Another landfill on the Peninsula;
 - c. Incineration;
 - d. Destructive distillation of waste (pyrolysis);
 - e. Long haul; and
 - f. other options not yet identified.
6. The trend toward increased tourism as a segment of the economic growth was identified after viewing the data on taxable sales volumes and employment. Both of these factors have shown growth. Using taxable sales volume as an indicator would not be affected by the actual tax rate, because it is the dollar volume of tourism business done before the tax is assessed. Retail sales revenues were also examined, but the trend was identified by using the taxable sales volumes and not revenues which would be affected by any tax rate increase. Employment growth in the hotel/motel employment category also supported the identified trend.

total # of contiguous ownerships (all)	57	
total # of contiguous ownerships (non commercial)	28	49%

This shows that 49% of the owners who own more than one contiguous lot in the area have the potential for future development of multi-family housing without disturbing the ownership of other single family owners

In this survey Area between Laurel St. and the Valley, 8th St. and 2nd, there are, approximately 311 platted lots

# of platted lots in the study area.....	311	100%
# of vacant lots in study area.....	4	.01%
# of lot commercially developed	47	15%
# of net lots remaining in the area	260	84%

Ratio of mulfi-family to single family:

# of net lots remaining in the area	260	84%
# of currently developed lots used as RMF	94	36%

This shows that 36% of the property in the survey area would become non conforming if the area were down zoned.

The new comprehensive map is consistent with the vision of the original city planners and has been sustained through the past 46 years by subsequent planning departments and planning commissions. The implementation of this plan is evident and should continue into the future. If it had not been for the deep recession we had in the 80's we would have seen even more development in the area.

Thank you



Chris Muir

Draft Comprehensive Plan and Draft Environmental Impact Statement (DEIS)

Port Angeles Comprehensive Plan FEIS

Mayor: This is the first public hearing before the City Council on the Draft Comprehensive Plan's goals and policies. This is the only hearing scheduled for the Draft Environmental Impact Statement, which is referred to as the DEIS. This opportunity may be the only one to present verbal comments on the DEIS. Written comments have been accepted since March 8, and will continue until 5 p.m. tomorrow. The Council, if it does choose however, could extend the DEIS comment period if it chooses to do so. The Draft Comprehensive Plan is not the completed document, because the City Council still has to complete and the Staff has to complete the Comprehensive Facilities element. The purpose for this draft this evening, is to allow the public and the City Council the earliest opportunity possible to begin reviewing those elements that have been completed. When we have the CFE completed, then this will come back before the Council and additional public review will then follow. The Draft Comprehensive Plan presented this time, consists only of the Draft's goals and policies. These are the legal statements with which future plans and decisions must be consistent. The narrative text is considered informational and subject to updates. Once the Capital Facilities Enhancement is drafted, the text will be added to the goals and policies and the complete Comprehensive Plan will be brought then, to the City Council for additional public hearing. I am just trying to outline for you the sequence of events. The Council has received some language from the Planning Department on the wording of "should" versus "shall". Some discussion on consistency. The recommendation from the Planning Department is that the Council accept public testimony this evening on the Draft goals and policies and the Draft Environmental Impact Statement, and then once we close the public hearing we will note that an additional public hearing will be scheduled to complete the Comprehensive Plan once all elements are in hand. So, if that doesn't confuse you, I don't what will.

At this point, I will open the public hearing. Just to let you know, you are welcome to comment on this, and we will not be taking any action this evening. We simply are sitting in a capacity for you to share your thoughts with us.

L. Ross: My name is Lorraine Ross. I live at 418 E. Front Street. We have just listened to a presentation that looks real great for bringing more tourists to our area, and we need to be thinking about our traffic problems. I would have you refer to page 14 in the Comprehensive Plan. Specifically, to Item 5. It says "At a minimum, improvements should be made for the development of full access at Hwy. 101 and the truck route. Improvements should be made to the intersections of Lauridsen Blvd. at Lincoln and Peabody Streets. Improvements should be made to Lauridsen Blvd. bridge over Peabody Creek, and here is where I would like to see a change. I would like to see this next sentence made a separate item, perhaps 5A. Improvements should be made for the development of one or more crossings over White's Creek. I think we are far from making any kind of decision as this document does at this point, of choosing a crossing at Lauridsen Blvd. over White's Creek, which would result in a major expenditure, which I don't think there's any money in sight to do such a thing. Where we might be able to put together a crossing over White's Creek down Third, Fourth or Fifth Street, whichever it worked out. I would turn to Item 15, which says "Fire protection should be a key factor in residential subdivision street designs and circulation patterns." The danger of being caught with a highway blocked on First Street for our Fire Department to make a run to the Golf Course area, wherever a fire might occur, and the same blockage of traffic which we've already had a few incidents of and as time goes on, we're going to have more, might prohibit the Gale's Addition Fire Department from making a run too, to go up the Golf Course area. Anyway, I believe that rather than make a decision one way or the other when we have not any funds at this particular point for making either or any of them, please leave the option open by putting a one or more crossing of White's Creek, and then that leaves the door open for us to figure it out in the future. Thank

you.

Hallett: Thank you Lorraine, is there anyone else who would like to share comments with the Council.

John Pope: I'm John Pope, I live at 735 E. Sixth. I stumbled over the address, because I'm here in several capacities. Probably the most important one tonight is Superintendent of Schools. You received from the Port Angeles School Board, over my signature, a letter dated March 29. It was addressed to City Manager Jeff Pomeranz, and I believe that letter has been passed on to all of you. I hope you have had a chance to glance briefly at it. It contains some important issues, related to the Growth Management Act, and the development of our community. The impact of that development on our school system, and our ability to maintain a quality school system in Port Angeles. First, in my capacity as spokesman for the Board and under their direction, I'd like to make two points. They are made in the letter and I will just highlight them briefly for you. The first is, that the Board has, by formal action, asked that the City Council in its deliberations on the Comprehensive Plan, as the Comprehensive Plan continues to develop and the committees continue to work on it, that the City give serious consideration to defining concurrency to include the school district. This is a rather serious request, and we are very much aware of that. I was thinking about this as the gentleman who was behind me made their excellent presentation. I was kind of wanting to see a picture of Hamilton Elementary up here with it's roughly 700 students in its 400 student capacity building. Then, underneath this thick packet I'm holding a determination of non-significance for several projects in that same neighborhood, that could produce as many as 200 new students in that area before another school is produced on the west side of town, and housing of those students is crucial. We are now at a point where it's very difficult for the school district to house the students. Well, we simply are not doing a particularly good job of housing the students that we presently have. We're doing the best we can with what we have to work with, but we don't have the classroom space. We don't want to stand in the way of growth. We believe in growth. We believe we are a progressive school district, but we also want to do a good job with the students and we can't do it with inferior and overcrowded facilities.

The second point, not a formal action of the Board, but a consensus item of the Board, was this: The subject of impact fees has not been discussed much publicly in Port Angeles to my knowledge, except at a few real estate meetings, and rather extensively at School Board meetings. The School Board has not made a decision about wanting to request that the City Council give serious consideration to impact fees for schools for new construction or new development. We are however, the Board I should say, is in concurrence that it would like to ask the City, urge the City, to consider and to promote bringing together all the service agencies, which are affected, or identified in the Growth Management Law as agencies which would be eligible to collect impact fees through City or County ordinance. By the way, the same letter has gone to the County. Bring those agencies together to discuss the issue of impact fees to avoid the feeding frenzy concept on impact fees, and to avoid a tragic sort of massive impact fee environment in our community. If impact fees are to occur, they should occur in a systematic fashion, with the cooperation of the various agencies, and service providers who are eligible for impact fees. Again, let me make it very clear, that the School Board has not yet made or taken a position on impact fees, they have taken an official position on concurrency. Those are the two very important issues. If you will allow me, I would like to step aside from my role as spokesman for the School Board, at the moment, and now speak in my capacity as a member of the Growth Management Committee and as School Superintendent just speaking for schools, not the school board at this point.

that the route, if approved, would contain several positive features, that would tend to ease our minds somewhat, and in fact would be a state of the art project, attractive with slow moving traffic, devoid of large trucks. This is a pretty picture, but is it for real? The truth is, that this draft is really quite general, and it lacks specifics. There are a number of questions which I wish to address and hope that you folks on the Council will consider with serious intent in the weeks and months to come. The question that I hear the most is: Is this really necessary? In these times of economic instability, will we be able to, or desire to, pay for a project which may not be totally essential. I realize that this is projected into the future this plan, but, how much of a population growth is Port Angeles going to be able to handle? Try to find a building lot in this town. They are as scarce as hen's teeth. That brings us to the next question. Is this road really going to be a simple, cross town route for local folks going from the west side of the town out to K-Mart or vice versa. Or, will it some how or another, phase into a really busy bypass? Has consideration been made as to how you will mix traffic with all the children at the different schools, that's Franklin, Jefferson; how about the Lauridsen Group Home; the Crestwood Convalescent Center, which is also expanding, and Peninsula College which is already a traffic nightmare. Is this just a City issue or is the County going to be involved? If so, how will they be involved? Will this southerly uptown, crosstown route aid and assist emergency vehicles in reaching the other side of town with as much expediency as possible? I am talking here of the Police and Medics, Fire Department, and so on which are located right in this area. With this in mind, has any other street ever been considered as a cheaper and a quicker way to go? Is there no other option? Will this only be a two lane street as we were told at one of the meetings, or a four lane as we have heard rumored? If, indeed, it is only going to be an alternative route for local people, then it should never be more than a two lane street, and that's what it is now. At the Planning Commission meetings, we also quickly learned that it was a no-no to ever mention personal concern with our residential status as home owners up there. It seems it's not politically correct these days to be a "not in my backyard" fanatic. However, I'll take the risk of being self serving and I will ask, will we go the way of First Street, Front Street, or 8th Street, and eventually one day become commercial, and if so, then whatever will become of us? In closing, I hope this was not a done deal from the very beginning, and that the meetings we have attended we've only been spinning our wheels. Which brings me to page 2, part K of the Comprehensive Draft, under Goals and Policies "Citizens participation and coordination. Encourage the involvement of citizens in the planning process, and ensure coordination between communities and jurisdictions, to reconcile conflicts." So I conclude with one last question, how will this participation and coordination with the citizens be accomplished, and how much of this input will really matter. Thank you for listening.

Hallett: A couple of things there. I appreciate your comments. You need to be assured that nothing is a done deal. I can guarantee you that.

Harkins: I meant whether...it just seems that we went to all the meetings and we were told these things, but they just went ahead and put this up anyhow.

Hallett: Well, that's the purpose of this document, is to facilitate the type of comments you are presenting as others have and others will. Some selection have to be made, and whether we ultimately adopt that or not, will be dependent upon what we hear from you, so that's why your testimony and your comments are important, so you need to know that. Council has not reached any conclusions. The Council has had for a number of years, at least since I've been on, each year we talk about a transportation improvement plan, that's a document we have to file with the State.

Harkins: Yes, I understand that.

Hallett: Each year, when we have public testimony on that, there may be one person from the community that bothers to come and advise and share with the Council, where they would like their long range traffic improvement plan circulation and pattern for the community to be. Each year, of the public, the only thing we ever hear, is the need to have another east/west route, and specifically, one that includes the Boulevard/White's Creek crossing. That's the one that we've heard over and over again for the last seven years. So, that's probably why that the one you're referring to has now been mentioned, because that's the only one the public has shared with us, that they feel is most viable. It doesn't mean it's the only one, but that may explain to you why it's in the document that you see. It's because based on public input, that's what people have told us they want.

Harkins: I guess it must have been kept rather quiet, because although...

Hallett: We begged to have people like you and others at those meetings. I mean we announced those weeks and weeks in advance. We had several hearings. I mean, it's like...it blows us away that for whatever reason, only very few people will comment either publicly or in writing about the issue you are referring to. It's not like it's too late now, and I don't mean to minimize the comments this evening, or to...(tape changed)...six and seven years that's evolved into the preferred route. Now, it doesn't mean it's too late, which is why I would encourage you to stay informed and be part of this process.

Harkins: And we will be part of the future process.

Hallett: Just like you've always been. The door is always open, so at least at this Council.....

Harkins: I don't think it's ever gone as far as it has right now, and this is the first we heard of it in this aspect, but, we have been to meetings lately.

Hallett: That's fine, I just wanted to clarify that.

Schueler: I would like to ask Mrs. Harkins...I would like to ask a question, because certainly you are concerned, you've been involved, and you're telling us, your group, the people you've talked with and so forth, have made a decision about where you don't want the cross town road to go. Somewhere in your deliberations with other people, there must be some comments about where you do want a cross town route to go. Do you have any thoughts about that?

Harkins: Well, we are very suspect that this will not be just a cross town route, and that it will turn into a bypass including people from out of town, therefore, we would rather see...if there is going to be a bypass see it to get outside of all the people in community, after all no one is any better or not as good as we are, we're all the same. Some people have suggested going up through the power lines, although no one has ever really found out if it's really feasible or not. They've suggested a scenic route up around the park eventually, some day. But right now 8th Street is the cross town route, and I never hear anybody say anything about that. It is true, that when it get's to Race, you have to turn left and go down, but believe me, if when you go over White Creek with the bridge and then you have to turn left and go down to Penn and get on to 101, you're getting into the same kind of bottle neck. There really isn't any improvement there, except a big expensive bridge.

Collins: Mr. Mayor, just to add one point. When people refer to pages in the Draft document, I think some of you are working with the Draft document that went to the Planning Commission, the Council has a Draft document that's the recommendation from the Planning Commission, so, it might be useful...for example you've been referring to page 14, which is page 12 in their document, so you might refer to the element, which is Transportation, and the goal which is B, and

mean, but it's having a problem.

Then, if you turn over to page 15, page 13 excuse me, it's #15 on page 13. It has fire protection. It should be fire and police protection. It should be a key factor.

With that,....that's all I have, that's enough I'm sure.

Hallett: That's good for starters, thank you. Anybody else wishing to comment on this?

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Doyle: Doris Doyle, 1317 East Lauridsen Boulevard. Mr. Mayor and Council members, I would like to direct your thoughts to the transportation element on page 13, hopefully, you're looking at the same one I was, of the Draft Comprehensive Plan. Under General Comments, it is stated that the transportation element is to define in a comprehensive manner, how traffic is to be routed from one portion of the community to another in the most efficient, economical and compatible manner. While I realize that our friends and neighbors on the Planning Commission and others spent many hours composing the document, my question as a taxpayer, has to be why cross White's Creek at Lauridsen Boulevard, as this appears to be the least economical location? Have City Engineers gone to that site as well as other locations along the creek to see if this indeed, would be a shorter distance than perhaps a more northerly location. To the average lay person, myself included in this, who has physically the proposed located, and several northerly locations as well, a visual survey of the terrain led me to assume that the Lauridsen Boulevard location would be the most costly. At several other locations the span appears to be at least one third less the distance. Is this true or not? The other question that comes to my mind in this regard, is where is the road going to go after it crosses White's Creek? Down Penn Street, Golf Course Road or wherever? The plan states that the City should designate an alternate route for local cross town traffic along Lauridsen Boulevard across White's Creek, ultimately connecting with 101. We know that we are going to 101, but how do we get there? My concern as a resident of Lauridsen Blvd., is where is the proposed plan in the provision for a major city bypass in the event that our City grows to the point where this would be necessary. Truthfully, most of us living on the Boulevard, fear that Lauridsen Blvd. is the unwritten, but nevertheless implied choice for the City bypass. The Comprehensive Plan makes no mention of a future major City bypass and it would seem that in order for us to avoid some of the problems that our neighbors in Sequim are dealing with right now, we need to include in writing, a provision or plan for the future should it be needed. Our Draft plan includes specific circulation patterns across the community, but unless I've missed something, I fail to see where it provides for a means to bypass the City. The possibilities for a scenic southerly route, with a minimum impact to residential areas would be the logical answer. Why not a very scenic route on the outskirts of Olympic National Park? Many of us present, have been publicly chastised for stating that we do not want Lauridsen Blvd. to ultimately become the City bypass. If you read the proposed policies on page 24, #3, I think this sentence speaks for those residents here and those who will be affected by any future traffic development on Lauridsen Blvd. Please take into account policy #3, the City should protect and enhance the characteristics of it's unique residential neighborhoods. My neighbors, with whom I have spoken, all agree that they built or bought their homes on the Boulevard because of the beautiful, unique location. None of us were aware of the plan or plans to make our front yards a major bypass for the City of Port Angeles. Please try to help us preserve what we have. It's special and it adds to the beauty of our City. Thank you for your time.

Hallett: Anybody else before we close the....go ahead.

Crawford: My name is Margaret Crawford, I live at 2619 South Race, and I'm one of the Committee members that worked on the Draft that's before you tonight, including

the recommendation for the cross town route on Lauridsen Blvd. Before I address some of the issues surrounding that decision that we made, I would like to just touch on a few other things that I'd like you to pay some attention to as you go through the draft. I was interested to hear Jim say that the Staff has submitted a thesis on should versus shall. That was probably responsible for about a year of the two years that we spent on this work. I just want you to know that the Staff was not bashful about sharing their thoughts with us on should versus shall, and we've taken those into account...we are quite deliberate where we say we do mean shall, and quite often those have to do with the City's internal policies and there's just kind of a sense - well at least the City ought to be able to itself what to do, other things maybe it's OK to be should, but on some internal things, the City ought to set itself some standards and try to live up to them. I do want to just emphasize that the document that you have is the product of public input. We started with a survey that went to one third of the utility rate payers in the City and we got a very good response, and there was a good cross section of opinion on which our beginning work was based, and we've also had several public meetings. While in some areas, particularly in the wetlands ordinances, we really felt that State policy, State law was dictating in great detail, what we had to accept. In this instance with the policy, the Growth Management Act really provided a framework that told us the areas that we needed to consider, but there really was quite a bit of leeway in how we addressed those issues, and this is much more the product of local recommendations, local options. I'm delighted to see that you are going to get a preliminary draft of the Capital Facilities Plan tonight, but that is moving along. That was the major impediment to many of the discussions, or reaching conclusions on many of the issues before us, was just not having the basic cost information that the Capital Facilities element will provide, and we do anticipate that a good deal of revision will be necessary, as the Capital Facility Plan and the policies we proposed are synthesized, and I'm very glad to hear that you do plan to continue hearings once those two documents are merged.

Mrs. Doyle just questioned the lack of resolution about an easterly intersection of our proposed cross town route with Hwy. 101, and that's one area in which this next point, one way in which my next point is made. We did not make specific recommendations for anything outside of the City limits, any specific locations for anything. We did not feel that it was appropriate for a committee made up of only City residents to make those kinds of recommendations, and so there is kind of a....at this point that cross town route is kind of a road to no where, but we did not feel it was appropriate for our committee to define a location outside of city limits.

Some of the ways this plan is different from the existing plan, you will see that there is a great deal of direction for the City to collaborate with other agencies in providing services and planning for services in the future. It does deal with affordable housing, something that's directed by the Growth Management Act, and something that has not been in previous plans, and the concurrency issue of course is a new one. There is also greater requirements for internal consistency, and we will always be finding some inconsistencies, but we...I guess I can say it's not like the old one, we really have tried to make things internally consistent, and that's the reason that when the Capital Facilities Element is proposed, the whole document again needs to be looked at for internal consistency.

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About the cross town route, that obviously was a very, very difficult decision. Our first proposal was for a route that would generally follow Scrivner Rd. route, and I can tell you that it brought out an equally irate neighborhood, and the main difference was that they weren't your constituents. Any route chosen as Mrs. Ross suggested, there are other places to cross that creek, but any route will result in some disruption while certainly Lauridsen Blvd. crossing may not be the narrowest, the least expensive way to cross White's Creek, other issues

Hallett: Thank you David. Before the Council takes a break, is there anyone else wishing to comment on this public hearing.

Muir: Good evening. My name is Chris Muir, I live at 214 West Second, in the lower Cherry Hill District, which is the area Mr. Stalheim is referring to. My views tonight not only represent my thoughts on this, but a number of the residents from the neighborhood.

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Mr. Stalheim's information is erroneous and his conclusions are not correct. Mr. Muir read a statement entered into the Planning Commission meeting regarding Mr. Stalheim's study.

Mr. Muir called Olympia to find out how to establish an historic district. The area should remain residential multi-family due to the proximity of city services. The majority of the area is multi-family.

Mr. Muir submitted a letter of testimony.
the public hearing was closed.

congestion will reach levels that local traffic will shift to collector and local streets to reach their destination. This would be most apparent in the summer.

The need for a cross-town route may diminish with the implementation of a by-pass. However, the DEIS identifies that :

"The cross town arterial might serve through traffic needs for 15 to 20 years but would likely experience capacity constraints unless it is widened to 5 lanes by the year 2012."

The Draft EIS identifies that a by-pass will be needed after 20 years because:

"An in city route may be able to accommodate growth within the 20 year time frame but may not be able to serve growth beyond this time period."

4. Doris Doyle Testimony

The need for a by-pass has been identified in the Draft EIS. The south by-pass was evaluated at part of the circulation network included in the No Action Alternative and the Strong Growth Management Alternative. The EIS showed that, while the growth would not immediately trigger the need for the south by-pass (Highway 101), the need for a by-pass would occur near the end of the Comprehensive Plan's 20 year planning period. Planning and implementation of a substantial project as the Highway 101 by-pass would take many years to complete. So that the planning for such a facility can begin, one of the mitigation measures in the Draft EIS Transportation section says:

"Pursue development of a by-pass like the one that has been discussed south of the City in the vicinity of Scribner. Initiate studies to define a preferred corridor so designation or reservation of right-of-way can be established before new development precludes the feasibility of such an option."

5. Margaret Crawford Testimony

The use of Lauridsen Boulevard for a second cross town route (W. 8th Street being the only current cross town route) is an important element of the overall circulation pattern needed for the residents of Port Angeles. You raise an important point in support of the use of Lauridsen as a cross town route -- "the width of right-of-way needed for major transportation corridor is already there."

As identified in Response #4 to the Doris Doyle testimony, the south bypass is not needed immediately, and will take considerable time to plan and implement. Time would also be used to evaluate the environmental impacts of the by-pass.

6. Margaret Crawford Testimony

You are correct, page II-97 of the Draft EIS identifies that:

"A review of these forecasts shows that traffic volumes along SR 101 and particularly along the Front/1st Street corridors, is going to increase to levels that represent between a 35% to 60% increase over today's volumes. In higher volume corridors (along Highway 101, Golf Course Road and 8th Street),

The Draft Comprehensive Plan contains a number of Goals and Policies (See Summary Chapter of this FEIS) which will encourage and guide the preservation of historic structures. The mitigating measures identified for Historic, Cultural and Archaeology Sites provides for additional emphasis on Historic Preservation. The historic preservation goal of the Growth Management Act has been met.

See also Response #1 to the letter from the Clallam County Historical Society. That response also relates to a process to later identify and designate historic district(s), sites and buildings.

10. Chris Muir Testimony

Your comments are acknowledged. A copy of the letter entered into the record from the hearing is contained with the comment letters.

APPENDICES

**Appendix A
Distribution List**

**Appendix B
Draft Comprehensive Plan Goals and Policies**

**Appendix C
Elwha Dam Removal Impacts To Public Water Supply**

**Appendix A
Distribution List**

Distribution List for Final EIS

Jurisdictions:

Indian Tribes

Lower Elwha Tribal Council

Makah Tribal Council

Jamestown S'Klallam Tribal Council

Quileute Fisheries Department

State

Washington State
Department of Natural Resources

Washington State
Department of Fisheries

Washington State
Department of Wildlife

Washington State
Department of Ecology (2 copies)

Washington State
Department of Transportation

Washington State
Department of Community Development
Growth Management Division

Regional Agencies

Port Angeles School District No. 121

Port of Port Angeles

Clallam County Transit Authority

Dry Creek Water Association

Appendix B
Draft Comprehensive Plan
Goals and Policies

DRAFT COMPREHENSIVE PLAN
(Goals and Policies)

AS RECOMMENDED
BY THE PLANNING COMMISSION
February 24, 1993

IV. GROWTH MANAGEMENT ELEMENT

General Comments

This Comprehensive Plan has been developed in accordance with the requirements of the State Growth Management Act. The City has met all of the Act's required deadlines for compliance and has participated with Clallam County, the City of Forks, the City of Sequim, the Tribes and various other agencies in the development of a County-Wide Planning Policy.

The City also agreed with Clallam County that the preferable method of planning for the Port Angeles Urban Growth Area is a joint co-operative effort between the City and the County.

The following goals and policies are included in the Comprehensive Plan to insure continued compliance with the Growth Management Act and compatibility with the County's Comprehensive Plan outside of the PAUGA.

Goals and Policies

Goal

- A. To manage growth in a responsible manner that is beneficial to the community as a whole, is sensitive to the rights and needs of individuals and is consistent with the State of Washington's Growth Management Act.

Policies

1. In all its actions, the City shall strive to implement the following goals of the State Growth Management Act:
 - a. Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.
 - b. Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.
 - c. Transportation. Encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.
 - d. Housing. Encourage the availability of affordable housing to all economic segments of the population. Promote a variety of residential densities and housing types, and encourage

of lands, sites and structures that have historical or archaeological significance.

2. The Port Angeles Urban Growth Area (PAUGA) should be established based at a minimum upon land use demand as determined by the Clallam County 20-year population forecast for Clallam County and specified sub-areas, so long as the county-wide forecast is not less than the most recent forecasts available from the State Office of Financial Management.
3. The City shall work with the County to develop an annexation plan which allows the annexation of land characterized by urban development, and which is consistent with the extension of services and the land development policies of the City's Comprehensive Plan and Capital Facilities Plan.
4. The City should work with the County to ensure appropriate techniques for managing future growth consistent with the urban density, such as a minimum density within the PAUGA and a maximum density outside the PAUGA. A range of densities should be provided for by the City for lands within the PAUGA, including some lands for relatively low density single-family development and some lands at a range of densities both allowing and encouraging multi-family development.
5. Urban services/facilities required to meet the needs of new development shall be provided, or shall be planned to be available, within six years in order to meet the levels of services established for such services.
6. The City should work with the County and other service providers to determine the appropriate levels of service for such facilities and services and to ensure consistency between service provision within the City, the PAUGA and the County.
7. The City should recognize a density of one unit per acre as urban/suburban and should use this density as the demarcation between urban and rural for purposes of establishing or amending the PAUGA.
8. The PAUGA should include areas characterized by urban growth adjacent to the existing City boundaries and should take into account the area's physical features.
9. Land designated for commercial or industrial uses which encourage adjacent urban development should be located within the PAUGA.

V. LAND-USE ELEMENT

General Comments

The Land Use Element establishes City policy regarding how land may be developed. This element and its Land Use Map establishes the following six comprehensive plan land use categories:

Low Density Residential;
Medium Density Residential;
High Density Residential;
Commercial;
Industrial; and
Open Space.

These land use categories are described below.

Low Density Residential (Up to 9 Units per Net Acre)

The Land Use Map identifies three separate categories of residential development. The first is Low Density Residential which allows an overall residential density of a project or property to range up to 9 units per net acre. The high majority of residentially designated property in the City will be of this designation. It is intended for the development of single family homes. It also allows for the development of duplexes and planned residential developments in accordance with the underlying zoning.

Medium Density Residential (Up to 15 Units per Net Acre)

This category applies to areas intended for the development of multiple residential unit projects including but not limited to duplexes, townhomes, condominiums, apartments and planned residential developments at a density up to 15 units per net acre.

High Density Residential (Up to 43 Units per Net Acre)

The High Density Residential category allows for development at a density up to 43 units per net acre and is intended for areas where a higher concentration of residents is compatible with the surrounding area and uses. Condominiums, apartments, and planned residential developments are the types of building designs appropriate for this category.

4. All residential developments should be encouraged to preserve and capitalize on existing unusual, unique, and interesting natural features, should utilize and preserve scenic views, should maximize southern exposures, should offer protection from prevailing winds, and should be designed to minimize energy use.
5. Every effort should be made to consolidate and utilize land donated for public use to provide common open space, public buildings, and parks.
6. Planned Unit Development and Planned Residential Development techniques, should emphasize the overall density of the development rather than individual lots or dwelling units.

Goal

- B. To have a community of viable districts and neighborhoods with a variety of residential opportunities for personal interaction, fulfillment and enjoyment, attractive to people of all ages, characteristics and interests.

Policies

1. Residential land should be developed on the district and neighborhood concept. Although some residential districts may be composed primarily of residential uses of a uniform density, a healthy, viable residential district should be composed of primarily residential uses of varying densities which may be augmented by subordinate and compatible uses. Single family and multi-family homes, parks and open-spaces, schools, churches, day care and residential services, home occupations, and district shopping areas are all legitimate components of district development and enhancement. A neighborhood should be primarily composed of low, medium or high density housing.
2. Medium and high density housing should be located in areas of the community most suitable for such uses, based on existing services, public facilities, and transportation.
3. Medium and high density housing should be located on arterials of sufficient size to satisfy traffic demand, in order to lessen neighborhood traffic congestion.
4. Medium and high density housing could be a transitional use between different land uses, provided such other uses would not adversely impact the residential nature of the housing.

4. New shopping centers should be located within the Highway 101 corridor.
5. Commercial development outside the Highway 101 corridor should not be in a strip pattern.
6. New commercial zoning should not be located along the alternative cross-town route (See Figure 12).
7. District shopping areas should be located at the intersections of arterials of sufficient size to satisfy traffic demand and at the boundaries of neighborhoods so that more than one neighborhood may be served.
8. District shopping area uses should be allowed in residentially designated areas as long as they are in accordance with the planning area/district/neighborhood land use concept.

Goal

- E. To provide a pleasant, safe and attractive shopping environment in the traditional downtown waterfront area which provides a wide variety of shopping, dining, entertainment, and housing opportunities for visitors and residents alike.

Policies

1. Commercial development in the traditional downtown should re-emphasize its waterfront location and historic heritage, should be oriented to pedestrians and tourists, and should provide maximum enjoyment of the environment and public amenities as well as protection from adverse weather conditions.
2. The City should continue to promote improvements to the traditional downtown area, through beautification projects and in cooperation with downtown business merchants.
3. Residential uses should be encouraged for the downtown area as part of a mixed-use development concept.

VI. TRANSPORTATION ELEMENT

General Comments

The intent of the Transportation Element is to define in a comprehensive manner how traffic is to be routed from one portion of the community to another in the most efficient, economical and compatible manner.

The City's Circulation Plan in accordance with the Statewide National Functional Classification System identifies the City's principle arterials, minor arterials, and collectors with the remaining streets classified as locals.

Goals and Policies

Goal

- A. To develop a coordinated, multi-modal transportation system which serves all areas of the city and all types of users in the most safe, economical and efficient manner possible.

Policies

1. Pedestrian and bicycle paths should be an integral part of the circulation system.
2. The safety of non-motorized modes of transportation should be a primary consideration in the circulation system. Adequate sidewalks, crosswalks, bicycle paths and handicapped access should be provided.
3. The collector arterials and local access streets should serve primarily local traffic with special emphasis on safety for pedestrian traffic.
4. Transit terminal locations which should include but not be limited to public transit, commercial bus, taxi, ferry, and airport shuttle services should be located as near to the downtown core as possible.
5. The City should consider securing rights to the use of air space where it may be valuable to the community.

standards as adopted by the City.

10. Arterial street rights-of-way should be acquired by the City in advance of the time of development in accordance with the Comprehensive Plan's Circulation Plan Map.
11. Principal, minor and collector arterials should be located on the edge of district boundaries wherever possible.
12. Offstreet parking should be sufficient and accessible within business and residential areas to ensure that the traffic flow of the street is not impaired.
13. Parking requirements should make allowances for shared parking facilities.
14. The City should assist the public transit system by providing convenient access between neighborhoods, residential, commercial, and industrial areas and between major community facilities.
15. Fire protection should be a key factor in residential subdivision street designs and circulation patterns.

the lead in cooperation with other governmental entities to provide:

- * utility and emergency services;
- * transportation infrastructure, including trails and sidewalks;
- and
- * parks and recreation;

2. The City should participate as a "financial partner" to support essential programs and services including:

- * youth recreation programs and facilities;
- * library facilities;
- * senior programs;
- * affordable housing programs;
- * facilities for senior programs;
- * utility assistance for low income households; and
- * social and public health services.

3. As a "supporter," the City should promote and cooperate in providing programs and services including:

- * library programs such as information and assistance;
- * affordable housing information and referral;
- * economic and business development services;
- * tourism information and services;
- * schools and community learning;
- * fine arts;
- * community recreation; and
- * public and private youth, family and senior services.

4. The City should develop and use public facilities cooperatively, in the promotion of social and community services.

Goal

C. To provide safe, clean, useable and attractive public facilities which enhance the cultural, educational, economic, recreational and environmental attributes of the City.

Policies

1. Industrial diversification should be supported by the development of urban services.

VIII. HOUSING ELEMENT

General Comments

The City recognizes the extreme importance of available clean, safe and affordable housing in the community. In April of 1991, a Housing Needs Assessment Study was conducted for the Port Angeles area as part of a larger two county study. This report is included with the Comprehensive Plan as Appendix C.

The results of this study and public comments greatly influenced the development of the following goals and policies which strive to improve the quality, affordability and availability of housing for all segments of the community.

Goals and Policies

Goal

- A. To improve the variety, quality, availability and affordability of housing opportunities in the City of Port Angeles.

Policies

1. The City should expand the residential land use options in the Zoning Code by classifying residential zones by allowed density rather than by housing types.
2. Residential uses should be allowed in all non-industrial zones, including commercial and office zones.
3. The retention and development of safe and attractive mobile home parks should be encouraged.
4. The City should develop a program to improve substandard housing in the City of Port Angeles.
5. The City should plan for sufficient urban services to support future housing in a variety of allowable densities.
6. Accessory residential units should be allowed in certain residential zones, upon approval of a Conditional Use Permit.
7. The City should promote acceptance of low and moderate income housing through public information programs.

8. **The City should support affordable housing by developing utility cost savings programs.**
9. **The City should help support the provision of transitional and temporary housing for the homeless and/or displaced families.**

2. The City should maintain and preserve its unique physical features and natural amenities, such as creeks, streams, lakes, ponds, wetlands, ravines, bluffs, shorelines, and fish and wildlife habitats.
3. The City should protect and enhance the characteristics of its unique residential neighborhoods.
4. Building density should decrease as natural constraints increase.
5. The City shall establish minimum standards for development of properties which contain or adjoin critical and environmentally sensitive areas for the purpose of protecting such areas and enhancing their natural functions.
6. The City should regulate site design, preparation and development to avoid or minimize damage to wetlands and other environmentally sensitive areas.
7. Recognizing the functions and values of wetlands, the City should strive to achieve no net loss of wetlands.
8. The City should preserve uniquely featured lands which still exist in their natural states and which are notable for their aesthetic, scenic, historic or ecological features, and should prohibit any private or public development which would destroy such qualities while recognizing the rights of private ownership.
9. The City should develop a program of land banking, transfer of development rights, or other innovative techniques and open space preservation.
10. The City should promote public access to the shoreline while preserving a healthy shoreline environment.
11. The City should enhance and preserve the quality of its air and water as two of its unique physical features.
12. The City should protect its air and water quality by minimizing potential new pollution from new and existing sources.
13. The City shall develop and implement a plan to improve water quality which includes measures to reduce and minimize stormwater pollutants and combined sewer overflow pollutant discharges.

Policies

1. **The City should inform the public concerning the long term benefits of protecting and improving the quality of the region's air, land and water.**
2. **The City should encourage the development and implementation of environmental, historical and cultural awareness programs which focus on local and regional issues.**

and local residents.

7. The City should develop sufficient utilities improve traffic circulation, and identify environmental constraints in the airport industrial area in cooperation with other governmental agencies.
8. The City should encourage training and educational opportunities which strengthen and increase the variety of skills available in the work force.
9. The City should promote the motivation and availability of the community's work force as a major economic development strength.
10. The City shall encourage inter-jurisdictional discussion and cooperation with other governmental agencies to foster the economic development of the region.
11. The City should work with other community organizations in developing an effective business assistance program directed toward the commercial business owner.

Goal

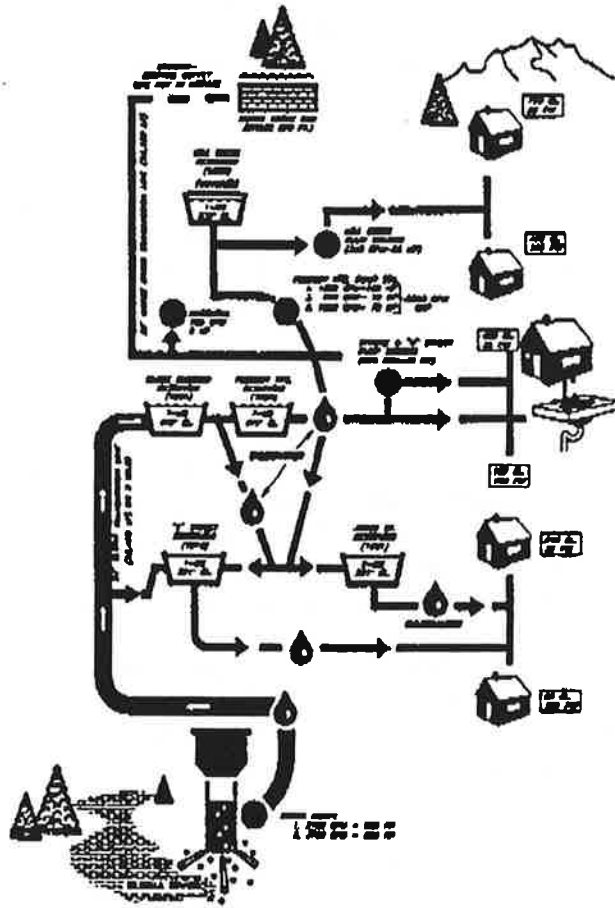
- B. To have a healthy local economy that co-exists with the community's high quality of life through the protection, enhancement, and use of the community's natural, historical and cultural amenities.

Policies

1. The City should promote the region's quality of environment and available natural resources as factors in attracting and retaining business, industry, and individual enterprises.
2. The City should promote the community's quality public school system and its diversity of other educational opportunities as factors in attracting and retaining business and industry.
3. The City should encourage the enhancement of the existing two year community college through such means as the expansion of its technical curriculum and additional four year degree opportunities.
4. The City should promote development of planned office, business and industrial parks, while conserving unique physical features of the land maintaining compatibility with other land uses in the surrounding area.

Appendix C
Elwha Dam Removal Impacts
To Public Water Supply

ELWHA DAM REMOVAL IMPACTS TO PUBLIC WATER SUPPLY



Presented to PNWS/AWWA Conference
May 8, 1992
by Jack Pittis, P.E.
Director of Public Works
City of Port Angeles



average discharge ranges from 618 cfs (399.4 MGD) to 952 cfs (615.2 MGD).

The City of Port Angeles has 200 cfs of total water rights from the Elwha which is divided into 50 cfs (32.3 MGD) groundwater used for domestic purposes, 100 cfs (65 MGD) of surface water used for the Industrial supply, 45 MGD is assigned to the ITT Rayonier Mill and 20 MGD to the Daishowa Mill, and 50 cfs (32.3 MGD) of additional surface water for fish rearing used by the Washington State Hatchery located next to the Ranney Well site.

The industrial main withdraws surface water at RM 3.4 which is transported through a gravity flow 48 inch diameter pipeline to the mills in the Port Angeles Harbor.

The City of Port Angeles's domestic water is withdrawn from the Elwha river through a Ranney Well System located adjacent to the river at RM 3.1. The well is a 13 foot diameter, 60 foot deep concrete caisson with seven perforated laterals, which vary from 39 to 115 feet long. Its design capacity is 11 MGD using 2-600 horsepower motors and 7-stage vertical turbine deep-well pumps. The facility is expandable to 15 MGD by adding a third pump. [Exhibit C for Ranney Well] The pump station is connected to the distribution system by a 5 mile long 24" diameter ductile iron transmission main. [Exhibit A for vicinity map]

The City's average domestic consumption is approximately 3.3 MGD with peak demands of 7.3 MGD [Aug 20, 1985]. The current population is about 18,000 and there are 7,070 service connections.

This source has been very dependable since its installation in July 1978. The perforated laterals have never needed backflushing to clear any siltation deposits. This is believed to be due to the gravel deposits being of fairly consistent size, with limited fines. The existence of the dams settles most of the fines in the reservoirs behind the dams. On occasion during extreme high flows of the river, the pumps have been shut down to eliminate pumping highly turbid water that travels across the gravel bar down the caisson and into the water column. This condition normally lasts only a few hours at a time and has not drastically reduced service due to 17 million gallons of reservoir storage.

The system provides excellent water quality to City residents. The required water quality tests are conducted and results have been in compliance with all requirements. The City recognizes that the Ranney Well is classified as groundwater under the influence of surface water and that there is a potential for additional treatment to be required. The current schedule for the final determination on treatment requirements for the system is between 1995 and 1996, unless conditions dramatically change.

within the existing reservoir area, silt not transported downstream by the scour of the channel would be allowed to remain in place and protected by erosion control measures; The lowest estimate of sediment built up behind the dam is 4.5 million cubic yards of fine sand immediately behind the structure plus 5.4 million cubic yards of sand/gravel in the upper delta.

- 4) complete the removal of the dam and other structures once sediment stabilization is accomplished; and
- 5) reclamation and revegetation of disturbed areas."

The removal of both dams would occur concurrently over a five year period. The initial cost of dam removal is estimated in the DEIS to cost \$64 million (1990 dollars) and includes the expense of river diversion, sediment stabilization, demolition and removal of structures, revegetation, and fish production facilities for supporting the restoration program. There would also be plant outage costs during removal and ongoing maintenance costs associated with revegetation program, the fish restoration program, and loss of power production. The approach and estimate developed in the DEIS did not, however, consider the significance of the impacts to the domestic and industrial water supplies and any water filtration costs.

WATER QUALITY IMPACTS TO THE CITY OF PORT ANGELES RELATED TO REMOVAL OF THE DAMS

As a part of their process, FERC distributed a Draft Environmental Impact Statement in February 1991 with the Final EIS scheduled to be distributed in June of 1992. As a result of a review of the DEIS, some of the City's main concerns with dam removal and water quality and quantity involves the following issues:

TURBIDITY AND WATER QUALITY

Current turbidity levels in the river range from 1.5 to 3.8 NTU (with an average of 2.3 NTU) and peaks have been experienced at 70 NTU. These measurements could be low as they may not take into account ~~current~~ ~~water~~ ~~conditions~~. ~~Projections~~ ~~indicate~~ ~~that~~ turbidity may increase to ranges of 100 to 200 NTU during the construction period and several years thereafter. This increase could violate state water quality standards which limits increases that can occur over natural values. High turbidity levels would be expected to occur for relatively short periods of time, ranging from several hours to many days. Long term turbidity values after dam removal are not anticipated to be significantly different from current conditions but it will take approximately 4 to 6 years for the channel to approach stability.

In addition to the turbidity concerns, it is very likely that organic material concentrations, bacterial levels, and nutrient concentrations will increase significantly in the river following dam removal as products of an increased meandering of the river

The estimated cost of construction which is not included in the estimates for the removal of the dams for a conventional 11 MGD water treatment plant is between \$11 and \$12 million dollars (1991 dollars), which does not include the cost of land. The operating cost would range from \$350,000 to \$400,000 per year.

POTENTIAL FLOODING

The river is projected to have average streambed elevations increased from 1 to 5 feet or an average of 2.5 feet in the lower 2 miles of the river. This increase could cause flooding of structures in the area. This flooding potential could also be projected to include the City's Ranney Well and associated support buildings. [Exhibit B for river profile] Additional, more specific information has been requested on how the City's current and future structures would be protected from flooding.

WATER QUALITY IMPACT TO THE MILLS RELATED TO REMOVAL OF THE DAMS

In addition to the domestic water supply concerns, two mills in Port Angeles use the surface water of the river. ITT Rayonier produces material used in food products such as toothpaste and diet drinks as well as photographic film which requires that the water quality must be maintain extremely high levels. The maintenance of good water quality is essential to their continued operation and ability to compete in the world market place. Daishowa America also needs high quality water to produce telephone directory paper but not at the same level as ITT Rayonier. It is the mills current opinion that the increased sediment loads can not be addressed using the existing water treatment equipment at either the ITT Rayonier or Daishowa Mills. If the sediment projections are correct, there will be an additional problem related to the maintenance of the gravity flow, low velocity, pipeline which transports the water to the mills.

It has been estimated that the construction of a water filtration plant to address the decrease in Elwha River water quality to meet the needs of the mills will be approximately \$25 million (1991 dollars) and that the operating costs will be \$2 million per year. If the process of dam removal is not well thought out in advance, significant economic hardship could occur to the Mill's water filtration processes and 754 direct jobs and the community's economic well being are at stake.

WHAT DOES PROPOSED LEGISLATION DO FOR THE CITY?

The legislation introduced into the Senate, on April 2, 1992, [S.2527] and House titled "ELWHA RIVER ECOSYSTEM AND FISHERIES RESTORATION ACT" will address a number of the water quality needs of the City of Port Angeles and will specifically do the following:

- A. Transfer ownership of the dams to the Department of the

borne by the Secretary for as long as such actions are necessary to protect existing high quality water.

In addition, if the dams are started to be removed and are not completed, for budgetary reasons, the Secretary is still responsible for fishery mitigation and correction of water quality problems, if any resulting from such dam removal actions in order to assure the continued availability of high quality water for city, Dry Creek, and industrial users.

There shall also be an agreement with the state to ensure instream flows necessary to support achievement of ecosystem and fisheries restoration and enhancement goals without adversely affecting existing water rights.

CONCLUSION

At this time, the City of Port Angeles can not draw any final water quality conclusions related to removal of the dams on the Elwha River. The environmental, economic, and technical elements centering around the removal of the two dams will take a number of years to sort out, since something of this magnitude has not been accomplished before other than by disaster.

Despite our efforts to inform others at the early stages, the original environmental considerations almost ignored the water quality issues. We are, therefore, playing catch up in attempting to educate decision makers on the importance of water quality related to the removal of the dams.

It is essential that if the dams are to be removed that water quality is addressed prior to dam removal, since solving the problem after the fact will expose domestic customers to potential health risks and shut down two mills that employ 754 direct jobs in a community that is already impacted by reductions in the timber industry.

The City must and will continue to express its concerns over water quality and ask for guarantees to protect its water interests for domestic and industrial uses. Unfortunately, the Bill introduced in Congress does not contain funding to accomplish its objectives, but it still serves as the City's best hope to preserve water rights, quality, and quantity for its citizens. We will remain apprehensive since the final decision will most likely be made in the "other Washington".

EXHIBITS:

- A. Vicinity Map of the area
- B. Elwha River Profile



ELWHA RIVER PROFILE

EXHIBIT C

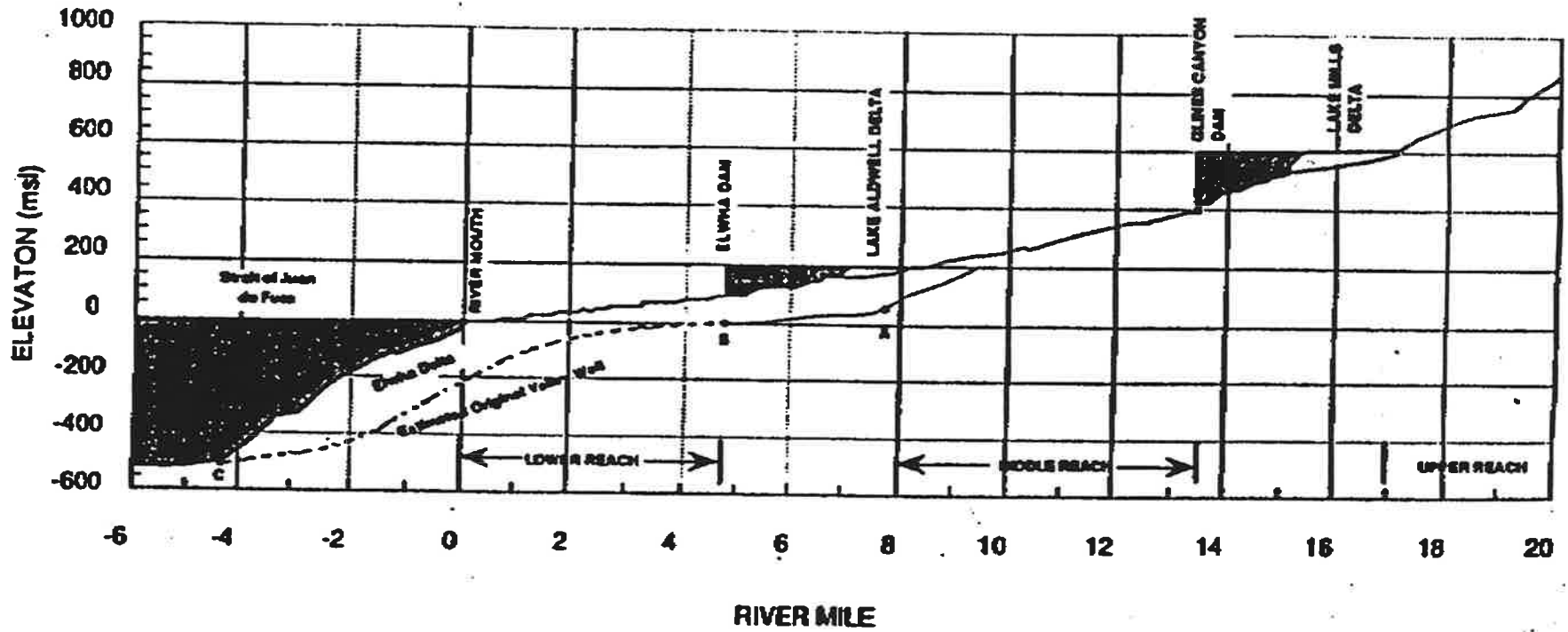


Figure 3-5. Elwha River longitudinal profile: river mile 20 to delta.
(Source: the staff).

