



memorandum

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to Lara Thomas, City of Duvall
cc Roger Wagoner, BHC

from Reema Shakra, Environmental Science Associates

subject City of Duvall Comprehensive Plan Update - Approach to Environmental Review

The following outlines ESA's approach to analyzing the elements of the environment and developing action alternatives for the environmental impact statement (EIS) on the City of Duvall's draft Comprehensive Plan.

Alternatives to be Considered

This section describes four preliminary EIS alternatives that would be presented to the public at an EIS scoping meeting. Following the scoping meeting, the City may choose to revise the alternatives for evaluation in the Draft EIS. It is assumed that each alternative would accommodate the 2031 household and employment allocations assigned by King County to Duvall. Duvall is anticipated to grow by 1,140 households and 840 jobs by 2031.

EIS alternatives evaluate the proposal, the no-action alternative, and other "reasonable alternatives" [WAC 197-11-786, 197-11-440(5)]. A reasonable alternative is a feasible alternate course of action that meets the proposal's objective at a lower environmental cost. The EIS examines areas of probable significant adverse environmental impact associated with the various alternatives including the no-action alternative and the proposal.

The four preliminary EIS alternatives are described below:

1. **No Action Alternative** – assumes the household and employment allocations established by King County and approved by the City would be accommodated within the current city and urban growth area (UGA) limits consistent with the goals and policies in the existing Comprehensive Plan and the current regulations of the Duvall municipal code. This alternative also assumes the City would support annexation of the North urban growth area (located along 275th Avenue NE) and development would occur consistent with the pre-designation of Residential 4-4.5 units per acre (R4-4.5). Under this alternative, the UGA-Reserve and the southwest UGA (Burhen property) would not be annexed. See Map 1 for the existing Comprehensive Plan land use designations.
2. **2015 Comprehensive Plan Alternative** – assumes the household and employment allocations would be accommodated within current city limits and UGA consistent with revised goals and policies in the draft Comprehensive Plan and the following revisions to the land use designations and zoning districts:
 - a. Riverside Village (RIV) zoning district would change to Residential 6 (R6) and Old Town (OT) zones;

- b. Mixed Use 12 (MU12) zoning district would change to Commercial, Residential 20 (R20), and Residential 8 (R8) zones;
- c. Residential 12 (R12) zone would change to R8; and
- d. A new R20 Comprehensive Plan land use designation and corresponding zoning district would be created to address the multifamily needs in Duvall, specifically small unit condominiums and apartments that are not feasible in the current R12 and MU12 zones.

To avoid creating legal, nonconforming lots, the zoning changes described above would not affect properties with approved preliminary plats or already developed properties.

This alternative also assumes the City would support annexation of the southwest UGA (Burhen property) and assign a pre-designation of Commercial (for the two northern parcels) and Open Space/Parks (for the two southern parcels). See Maps 2a and 2b for the proposed Comprehensive Plan land use designations and zoning districts.

- 3. **Urban Growth Area Reserve Alternative** – assumes the City would assign a pre-designation of R4-4.5 to the UGA-R and the City would support annexation. Due to the size of the UGA-R, the alternative would assume a phased annexation, beginning with the area west of Batten Road UGA. See Map 3 for the proposed Comprehensive Plan land use designations.
- 4. **Revised Urban Growth Area Boundaries Alternative** - assumes the portion of the existing UGA-R east of Batten Road would be removed and replaced with an approximately equal area south of Big Rock Road that is not currently within Duvall’s UGA or city limits. This new area would receive a pre-designation of Commercial and various residential designations and the City would support annexation. See Map 4 for the proposed Comprehensive Plan land use designations.

Elements of the Environment

The following are anticipated elements of the environment that could be evaluated in the EIS. These may be reduced or new elements added based on scoping comments. The impact from climate change will be included in the impact discussion for all applicable elements.

Water Resources

The approach to evaluating potential water resource impacts would be as follows:

- Affected environment would describe the findings of the watershed characterization, current water quality problems, mapped wetlands, and existing policies and regulations.
- Impacts analysis would provide a qualitative description of the affect new development under the four alternatives would have on water resources based on the watershed characterization study. The impact on water quality as a result of new development would be qualitatively described. The implications of the draft sustainability and environment element would also be evaluated.
- Special focus will be paid to the basins that are anticipated to have the biggest change in land cover.

Earth

The approach to evaluating potential impacts to earth would be as follows:

- Affected environment would describe the existing soil and slope conditions, as well as policies and regulations.
- Impacts analysis would provide a qualitative description of the affect new development under the four alternatives would have on soils and slopes and the implications of the draft sustainability and environment element.
- Special focus will be paid to mass grading.

Plants and Animals

The approach to evaluating potential impacts to plants and animals would be as follows:

- Affected environment would describe existing plant communities, land cover and forest cover, streams and other habitat features, migratory corridors, and presence of fish and wildlife.
- Impacts analysis would provide a qualitative description of the affect new development under the four alternatives would have on plants and animals and the implications of the draft sustainability and environment element.
- Special focus will be paid to migratory corridors and water quality as it relates to in-water habitat.

Land Use and Housing

The approach to evaluating potential land use and housing impacts would be as follows:

- Affected environment would include a description of existing land uses in the city, UGA and revised UGA, land use and housing policies, policies and regulations addressing affordable housing, housing characteristics, land use designations, and zoning districts.
- Impacts analysis would evaluate land use compatibility under the four alternatives by describing the land uses changes that would result from anticipated growth and implications of the draft land use and housing element on such growth.
- Element will address the City's affordable housing needs and approaches to increasing density.

Historic and Cultural Resources

The approach to evaluating potential historic and cultural resources would be as follows:

- Affected environment would include a description of existing historic and cultural resources.
- Impacts analysis would evaluate the potential impact growth would have on existing resources under the four alternatives.

- Special focus will be paid to the historic character along Main Street.

Aesthetics

The approach to evaluating potential aesthetics impacts would be as follows:

- Affected environment would include a description of scenic resources (based on site visit, public input, current features), existing policies, and regulations that influence urban form.
- Impact analysis would provide a qualitative description of the effect new development under the four alternatives would have on scenic views.
- Special focus will be paid to scenic resources identified by the community as part of scoping.

Noise

The approach to evaluating potential noise impacts would be as follows:

- Affected environment would include a qualitative description of existing environment noise sources, location of sensitive receptors, and existing noise regulations (at the state and local level).
- Impacts analysis would provide a qualitative description of the noise new development under the four alternatives would produce and the effect of existing noise sources on new development.
- Special focus will be paid to noise sources along arterials and highways.

Public Services and Utilities

The approach to evaluating potential noise impacts would be as follows:

- Affected environment would include a description of existing and proposed public facilities and utilities (police, fire, school, government, parks, and utilities), current deficiencies, and level of service standards.
- Impacts analysis would provide a qualitative description evaluating whether the projected housing and job growth under the four alternatives would create or add to existing deficiencies based on phone interviews with key providers.
- Special focus will be paid to parks, stormwater, and internet services.

Transportation

The approach to evaluating potential transportation impacts would be as follows:

- Affected environment would describe existing traffic volumes along major roadways, traffic accident data, congestion hot spots, as well as transit, pedestrian, and bicycle facilities and any existing deficiencies.
- Impacts analysis would provide a qualitative description of the traffic new development under the four alternatives would produce relying on the modeled results of the City's transportation consultant. Impact analysis would also evaluate impacts on alternative modes of transportation.

- Special focus will be paid to SR203, Big Rock Road, 275th Avenue NE, NE 143rd, pedestrian facilities near schools, intersection upgrades, and inter-connectivity issues.