

SNOHOMISH COUNTY
PLANNING AND DEVELOPMENT SERVICES
PERMITTING

M E M O R A N D U M

TO: Darrell Eastin, Project Manager
FROM: Frank Scherf, Senior Environmental Planner
SUBJECT: Point Wells Development (PFN 11-101457 LU)
DATE: May 12, 2011

This is in response to a request for review of the Point Wells proposed urban center development, stamped received by Planning and Development Services on March 4, 2011.

EXISTING CONDITIONS:

I have not conducted a field visit of the subject property yet for this proposal but have been on-site in review of the Brightwater project. Critical Areas (ie. streams, wetlands and the marine shoreline) have been disclosed in the critical area assessment conducted by David Evans and Associates, Inc. Please reference the January 2011 Critical Areas Report by David Evans and Associates, Inc. for specifics.

COMMENTS:

The application does not meet the standard requirements of Chapter 30.62A SCC. Staff suggests that the applicant make a request for review under the innovative development design provisions of SCC 30.62A.350. The critical areas study shall be revised to demonstrate conformity with the requirements of SCC 30.62A.350(1). All the submittal requirements pursuant to SCC 30.62A.130(1)(f) have not been met. The site development plans do not depict the location and description of all wetlands located within 300 feet of the site. Of issue is the non-classified wetland that lies "at least 200 feet north" of the site. Likely the wetland would be classified as Category 3. The critical areas study shall attempt to classify the wetland in order to determine whether or not a required buffer would extend on-site.

All the requirements pursuant to SCC 30.62A.130(1)(g) have not been met. The site development plans do not depict the location and description of all other critical areas regulated pursuant to Chapters 30.62B and 30.62C SCC on and within 200 feet of the site. Various critical areas are defined under this requirement including erosion hazard areas along shorelines subject to wind and wave erosion, landslide, seismic, critical aquifer recharge, and tsunami hazard areas. Staff suggests one exhibit page civil plan sheet size that depicts and classifies all critical areas to be shown on the site development plans.

The Critical Areas Report indicates the presence of non-fish bearing Type N streams in the project vicinity. Are those streams perennial or seasonal (Type Np and/or Type Ns)? On page 28 of the report a ditch/stream #2 was discussed that was previously described in "Section 4.4" of the report. There is no Section 4.4 of the report. I believe the author meant

Section 5.4. The report goes on to indicate that this feature could be classified as wetland although it may be considered artificial or man-made. Please provide an analysis under both the stream definition under SCC 30.91S.640 and wetland definition SCC 30.91W.070.

Please provide clarification of how the project meets the provisions of SCC 30.62A.320(1)(c) regarding impervious surfaces within buffers. SCC 30.62A.330(f)(iii) requires that structures (specifically docks, piers and floats) avoid critical saltwater habitat. SCC 30.91C.362 defines critical saltwater habitats as all kelp beds, eelgrass beds, spawning and holding areas for forage fish, such as herring, smelt and sandlance; subsistence, commercial and recreational shellfish beds; mud flats and intertidal habitats with vascular plants. Please provide an analysis of this specifically.

Please provide greater detail on the plans for restoring Chevron Creek.

Sheet A-051 contains a legend with listed constraints. What is the 75-foot buffer constraint from the OHWL under marine water?

Staff acknowledges that the EIS will evaluate the nearshore processes, critical saltwater habitats and other critical areas issues identified in this memorandum. Installation of the proposed groins is a concern and whether or not they are needed.

DISCLAIMER

The requirements and comments contained herein are specific to compliance with adopted County plans, policies, motions, objectives, and land use regulations as they relate to aquatic resource treatment only; and do not exempt the applicant from compliance with any other applicable local, state, or federal policies and regulations.