



**Snohomish County
Planning and Development Services**

Dave Somers
County Executive

Barb Mock, Planning Director
3000 Rockefeller Avenue M/S #604
Everett, WA 98201-4046
(425) 388-3311 FAX (425) 388-3832

MEMORANDUM

TO: Paul MacCready, Principal Planner, Project Manager

FROM: Rebecca Samy, Senior Planner/Certified Floodplain Manager (CFM)

SUBJECT: Point Wells PFN: 11-101457 LU and 11-101007 SP

DATE: June 27, 2017

The following comments are in response to the Point Wells submittal documents received on April 17, 2017.

Review Comments:

The short subdivision and Urban Center development are subject to Snohomish County Code Chapters 30.43C and 30.65. Specifically those areas located in the special flood hazard area (SFHA).

Effective Flood Risk Maps/Flood Insurance Rate Maps:

A portion of the property is located within the special flood hazard area (SFHA) as identified on the effective FEMA Flood Insurance Rate Maps (FIRMs) panels 53061C1292 E and 53061C1294 E, effective date November 8, 1999. The western edge of the property adjacent to Puget Sound is within the AE zone with a base flood elevation (BFE) of 10 feet NGVD 29'. The majority of the property is located outside of the SFHA.

Preliminary Flood Risk Maps/Flood Insurance Rate Maps:

Snohomish County received preliminary digital flood insurance rate maps (DFIRMs) in July 2016 and is in the process of reviewing these maps for potential adoption. Changes reflected on the preliminary DFIRMs will have direct impacts on the proposed project. The majority of the project site, including Phase 1, 3 and 4 will have a coastal flooding designation of AE with a BFE of 12' NAVD 88 per preliminary DFIRM panels 53061C1292 F and 53061C1294 F, dated July 22, 2016.

This information was provided to the applicant at the January 10, 2017 Innovative Development Design meeting and reiterated via email, with additional information on February 9, 2017. The preliminary FIRMs and the change in the flood hazard designation was again reiterated at the April 10, 2017 resubmittal discussion meeting.

June 22, 2017
11 101457 LU

Staff would like to reiterate that all development activities within the special flood hazard area requires a permit and is subject to the flood hazard designation and regulations in effect at the time of permit application.

Development within the special flood hazard area is defined per SCC 30.91D.250 means, means any manmade change to improved or unimproved real estate, including but not limited to buildings or other structures, dams, walls, wharves, embankments, levees, dikes, piles, bridges, improved roads, abutments, projections, channel rectifications, conduits, culverts, wires, fences, rocks, gravel, refuse deposits, mining, dredging, filling, grading, paving, excavation or drilling, and works as defined in this subtitle.

Development that is initiated utilizing the effective maps will be compliant at the time of construction, however if a map change is adopted those structures will become subject to the provisions of Substantial Development. This is where a structure can be improved up to, but not exceeding 50% of the fair market value of the structure before the start of construction, before it must come into compliance with the effective flood map BFEs. Here is a useful link describing substantial improvement: <https://www.fema.gov/floodplain-management-old/substantial-improvement>.

The applicant is strongly encouraged to utilize the preliminary flood hazard maps for project design and development and to speak with a flood insurance specialist regarding this project, specifically related to the below grade parking structures and any over water structures (commercial uses on the pier). This information was provided to the applicant's design team at the January 10, 2017 Innovative Design meeting.

Development within the special flood hazard area must demonstrate compliance with the Puget Sound Biological Opinion issued by the National Marine Fisheries Service (NMFS) on September 22, 2008. A habitat assessment is required for this project. Included here are useful links for preparing the habitat assessment and background information on the Opinion:

- Biological Opinion - <https://www.fema.gov/media-library/assets/documents/30021>
- NFIP and ESA - <https://www.fema.gov/national-flood-insurance-program-endangered-species-act> (be sure to click on Washington)
- Habitat Assessment Guide - <https://www.fema.gov/media-library/assets/documents/85343>

The proposed relocation of the bulkhead/seawall associated with Phase 1, South Village and construction of the promenade, may be subject to a conditional letter of map revision (CLOMR) as the relocation has the potential to change the location of the flood hazard area. Additionally the preliminary maps and associated BFEs may be affected by the bulkhead removal in addition to remediation work associated with the site cleanup. For information related to the CLOMR please visit the FEMA website: <https://www.fema.gov/conditional-letter-map-revision>

The following are requested revisions:

General:

1. Revise the application material to address the flood hazard areas, permitting requirements and address compliance with the preliminary flood hazard maps. The pier and proposed uses of the pier should be included. Submit a habitat assessment demonstrating compliance with the Biological Opinion. The habitat assessment information and associated effects determination maybe combine with the critical areas report.

Short Plat:

1. Short plat: Identify and label the flood hazard boundary. As shown this is labeled tidelands.
2. Include the FIRM panel number on the preliminary plat.
3. Demonstrate how the energy center will comply with SCC 30.65.110(3)(a & b) as it appears to be located within the special flood hazard area as shown on the preliminary DFIRMs.

Urban Center Plans:

1. Please clarify the datum used for the site plans for example NGVD 29 or NAVD 88.
2. Please clarify if the elevations shown are existing ground elevations or proposed finished elevations.
3. Show the flood hazard boundary on the site plans and include the BFE and datum used. The datum should be the same for elevations shown on short plat, civil drawings and site plans.
4. Energy Center (Sheet A-054):
 - Please provide a detailed description of the energy facility the lowest elevation for the energy center. Per SCC 30.65.120(1) all electrical, heating, ventilation, plumbing, and air conditioning equipment and other service facilities that are permanently affixed to a structure and which may be subject to floodwater damage shall be elevated a minimum of one foot above the base flood elevation or higher (unless within an approved watertight structure).
 - Clarify the use of the space shown to the south of the energy facility as shown on Sheet A-054.
5. Parking Garages: Clarify the elevations of the parking garage entrances on sheets, A-053 and A-054.
6. Elevations: Sheets A-310 and A311, please add the elevation from grade to these sheets.
7. Sheet E-050: There four groins shown. Are these proposed? If so they will require flood hazard permits. If they are not proposed, remove from the plans.

Please contact me if you have questions or need clarification regarding the information in this memorandum.

Sincerely,

Rebecca Samy
Senior Planner/CFM