

3.3.9 Resources: Use, Reuse, Management, Treatment, and Disposal (Water Quantity, Water Quality, and Use): Responses to DEIS Comments

Responding to comments by the Hood Canal Environmental Council (275 and 385); WRIA (16 and 359); Ellie Sather (287), Jefferson County Public Health (284), WDOE (281, 375, 376, and 381), Department of the Navy (285, 366, and 377); Pleasant Tides (Don Herrin letter) (220), Hal Beattie (125 and 133); Sugino (130), Germaine (129); Rebekah Ross (132), Murdoch (139), Dimino (193), Mitchell (212), Moore-Lewis (305), Ventura (312), McMillan (314); Streid (313 and 317), Lopez (272), Russell (282), Beattie (310), Sather (289), Mitchell (297).

Applicant has proposed that the Pleasant Tides water system be substantially upgraded and made more efficient, to provide an alternate source of water for the project. The Pleasant Tides program is strictly voluntary, however, and should they elect not to have Statesman participate in a joint use agreement, the Black Point aquifer under the resort site has a unique configuration that provides ample water to serve the needs of the resort, without salt water intrusion, and without jeopardizing draws on local wells.

Concern is raised that the technology is new and therefore unproven. The project incorporates numerous low impact, and water saving and treatment reuse approaches that are commonly in use in a number of resort venues, both in the United States and in Europe. Many are incorporated in existing Statesman resort properties under development in British Columbia. Historically, resorts have not been asked to be on the leading edge of low impact and water conservation approaches to development. The Statesman proposal incorporates technology proven to establish Class A treated water and accepted by state regulatory and resource agencies, including reuse, recycling, and low impact development techniques to achieve low-flow, non discharge approaches to water management. A specific project requirement is to assure hydraulic protection for streams and wetlands in a stormwater habitat management plan approved and put into place prior to any site disturbance.

A question was raised about the water quantity available from rainfall for the resort and whether the Quilcene gauge used in the initial reports was inaccurate when compared with the Brinnon gauge. Subsequent investigation shows the Brinnon gauge and the Quilcene gauge reflecting nearly identical levels of rainfall and well within the parameters of the project.

The wastewater materials explain the sources and uses of water, reuse, and treatment and how the system was designed to have no net impact on the aquifer and in some years an above normal recharge of the aquifer system with treated recycled water in excess of the current "natural" condition. He also noted that the storage pond has the capability of holding a minimum two-year supply of water in reserve for fire fighting purposes and for years in which rainfall falls below expected variations. The water report must address the ability of the site and aquifer to handle both the draw and infiltration and to assure that all systems are sufficiently removed from the south bank to protect bank stability.

The project is on a peninsula easterly of the mouths of the Duckabush and Dosewallips Rivers. As such, no direct impacts to those watersheds are anticipated by the construction and operation of the resort. Increased use and pressure on publicly-owned recreational facilities is anticipated. The resort is required to provide education programs to make residents aware of facilities and the rules and best practices associated with facility use, including fishing, beach, and forest use. Local state and federal management agencies are responsible for the development and enforcement of public land use regulations. The MOU process, built into the project approval phase, is designed to address impacts and mitigation addressed to a wide variety of public services and facilities. The EIS at the Comprehensive Plan level anticipates and considers the issues. The project-level approvals, when a specific phase is under review, will address the project-specific issues on a proper (nexus and proportionality) basis.

The phased review provides analysis of the site and current conditions to demonstrate the feasibility of the project proceeding on the planned basis. At the project level, issues about the specifics of sewer plant design, water rights serving each phase, and the technical issues of the capture, treatment, and

reuse of water and protection of water resources is achieved in the context of fully engineered plans and approvals by state agencies. The allocation of general feasibility and issue identification at the comprehensive plan level and the resolution of those issues during project approval is an appropriate approach to large projects.

The adoption of the Comprehensive Plan approval for a Master Planned Resort at Brinnon is followed by the approval of specific zoning requirements to implement the requirements imposed by the FEIS, and a development agreement that identifies phasing and approvals required to assure that the entire resort and its impacts are addressed properly at each stage of development. It provides an adequate basis for addressing the final systems and approvals necessary to assure the reliability and long-term operational success required for successful resort operation.

The proposal does project significant cut and fill on the site, but an overlay of the RV development on the site and the overall grading plan shows that the grading is substantially confined to areas previously disturbed by the RV park, roads, and campsites, and the fill is primarily a very large kettle in the middle of the site. The grading plan is subject to detailed requirements for wetland and critical area habitat protection and stormwater protection plans prior to development, including post grading stabilization controls prior to vertical development. The overall timing of the grading is controlled by the referenced permits and the development agreement, which is to detail the phasing plan and all components.

The FEIS contemplates a water quality monitoring program for Pleasant Harbor in conjunction with the Shoreline Substantial Permit for the marina phase of the development. The monitoring program would be coordinated with state monitoring programs and provide the basis for an adaptive management program. The specifics of the program are to be addressed as part of the shoreline permit review and be in place prior to any new development in the shoreline area.

Concerns about nitrogen loading and the potential impact on the aquifer are site and project dependent. The FEIS identifies the risk to the aquifer and Hood Canal from nitrogen and golf course management issues. The project-specific proposal is to address a specific nutrient management program, directed specifically to site conditions, the design of the golf course, design of the wastewater treatment system to remove nitrogen, and the design and application of the water reuse and stormwater management programs proposed for the site. All will be subject to review by regulatory agencies, including WDOE and the County, to minimize the potential for excess nutrient reaching the aquifer. Issues identified in the comments, including residual nitrogen and the ability of the proposed system to protect the aquifer will be reviewed at the project level and must be determined to be adequate prior to permit approval for the golf course phase of development. (Please see comment and response under shellfish above for more information.)

The reuse system does lend itself to a geothermal source for heating and cooling the facility, further reducing energy consumption and the carbon footprint. Reducing the impervious footprint and using low impact design methods also reduces the overall impact. No specific LEED rating has been selected and will be addressed at the project level, and operational details about recycling and energy efficiency will be addressed at the project level in light of the overall commitment to provide an energy efficient and resource efficient facility.

The wastewater ponds shown on the project plans can accommodate two years worth of water, and are designed to accommodate both very dry and heavy rainfall years and potential upset conditions. Engineering specifics are project-level details that must demonstrate adequate levels of safety beyond the standard 100-year event. This is done to assure expected maximum levels are contained. The stormwater control ponds are separate from wetland mitigation areas.

The reuse water will be used to meet the agronomic demands for irrigation, supplemented by stored stormwater as needed. Consequently, mounding as a result of reuse water infiltration is not expected to be an issue. Mounding as a result of infiltration and recharge using stored stormwater is a design constraint that will be addressed at the project level when the stormwater system is designed and approved. Roof top composition is a design-related issue, but the issue of direct discharge versus

treatment and reuse is a design-related issue under the WDOE "no degradation" standards for groundwater and aquifer protection.

The specific location of wells and the alternatives available are a design-related issue to be addressed at the engineering level to minimize the potential for impacts on existing water resources and potential alternatives in the event of upset or unintended consequences. Salt water intrusion is not considered a reasonable probability under the system described. Preliminary engineering figures identify the overall net impact as a "positive recharge" rather than "consumptive" use of the aquifer. These issues will be addressed in detail at the design and permit approval stages.

The FEIS identifies water quality and discharge as a major issue to be addressed onsite and the NPDES permits for both construction and operation are acknowledged, as are discharge permits under Chapter 90.48 if water discharge is not part of the final plans. WDOE review of engineering plans and treatment and disposal for the wastewater treatment program are all part of the required project approval process.

Water rights applications have been submitted and are pending WDOE review. The additional water rights will be subject to processing through WDOE approval requirements. Water availability and water rights are two limiting factors identified as potential constraints on the project and as such demonstration of adequate water to serve each phase is required as part of the planned permitting program. Should the necessary water not be reliably available for a proposed phase, the phase cannot be approved.

The DEIS did fail to address the State's Section 401 and wetland regulatory authority, which is acknowledged. WDOE approval of required permits and certifications will be part of any project approval altering or potentially affecting wetlands. State water quality standards are acknowledged.

The marina use and any potential increase will be addressed at each phase of development. As noted above, some increase could occur but the amount, timing, and nature of such traffic cannot be known at this time. No change in the configuration or capacity of the marina is anticipated, merely the rehabilitation or repair of existing degraded conditions. As phases are constructed, marina traffic will be monitored, as will water quality in the Harbor to measure and address any unanticipated impacts. Additional traffic information will be available through project review for each phase of the development and the Navy will be advised of all such applications. The waters of Hood Canal are controlled by navigation controls and notices to mariners, which can address specific concerns and regulations designed to aid Naval operations. The marina is committed to maintain information kiosks in aid of public education about naval operations and activities. The Canal is an open water, however, in which boating traffic is invited and encouraged to use (such as the upgrade of the WDFW boat launch at Pleasant Harbor). The Master Planned Resort will work with local agencies to assure education is achieved and is committed to a monitoring and adaptive management program to assure water quality. Water closures or acoustic limits would have to be imposed by the Navy or Coast Guard to regulate the general boating public.

The consultants have reviewed the well head protection programs for the Pleasant Tides and Pleasant Harbor Beach tract wells, which are located near the intersection of Black Point Road and US HWY 101. The Washington State Department of Health has guidelines for construction in the vicinity of public water supplies, which the project is required to meet. From a preliminary design point of view, no adverse consequences to the wells are anticipated. During final design and before project approval the wells, protected areas, and location of roads will be specifically addressed to assure that quantity and quality of water is not disturbed and the wells are adequately protected.

Any joint program with Pleasant Tides Water Co-op would require mutual consent and if they elect not to explore joint opportunities, the MPR will be required to meet its water needs elsewhere. The fact that no present agreement is in place is accurate, and the comment and expression of concern is noted.

Impervious surfaces and developed areas are capped as defined in the FEIS. The final report as to actual use regarding preservation of the aquifer will be in the engineering reports at the project level,

including a project-specific aquifer recharge report. The specific manner of infiltration and recharge will be determined by WDOE in its review and approval of the Class A reuse/recycling program, addressing water quality, water quantity, and capability; protection from pathogens; and other issues to assure no impact on either other water users in the area or the aquifer runoff and seeps.

The possibility of incorporating water use/reuse from other systems, if they are developed in time, could provide an opportunity to reduce dependence on aquifers and provide a mutual benefit should such alternative systems be available and would certainly be examined during the project phases.

The water treatment system looks at the totality of the treated loads to assure that the water discharged meets Class A water standards.

The project is required to have a stormwater and habitat management plan in place prior to the start of any construction to protect habitat and critical area and to avoid stormwater or construction runoff from entering the Canal.

The aquifer has been identified as underlying the resort property, and use as proposed is not expected to affect other water users. Specific parameters of use and limits to avoid impact are to be addressed during the water rights permitting program under WDOE guidelines. The overall availability of water and limitations or constraints as a result of the location will be identified at the water rights permitting phase, which must be concluded before specific project elements are permitted for construction.

3.4 Transportation

The County identified five specific issues to be addressed as part of the transportation review. (1) US HWY 101, (2) internal circulation, (3) marina circulation, (4) pedestrian circulation, and (5) bicycle circulation.

This section summarizes traffic and transportation existing conditions, project impacts, and mitigation measures of the Alternatives. A more detailed discussion and relevant technical supporting information and attachments are contained in Appendix 6: Transportation Impact Study.

3.4.1 Site Vicinity and Access Assumptions

The Pleasant Harbor development is located on US HWY 101 in the vicinity of Black Point Road in Jefferson County, Washington. A project site vicinity map is shown in Figure 3-13. The subject properties would include two main development districts under the Statesman proposal: Black Point Property and Maritime Village (see Figure 1-5).

There are existing facilities in the subject area, including a boat launch, beach, parking area, approximately 30 acres of forest, cottage business, a bed & breakfast, real estate office, vehicle/boat maintenance and repair shop, welding service, and vehicle and boat storage facility. Pleasant Harbor Marina currently provides moorage and fuel services with limited shopping and food service.

For transportation evaluation purposes, full build-out and occupancy of the project is within six to seven years from commencement. Vehicular site access would be consolidated for the Maritime Village and Black Point Property at US HWY 101 and Black Point Road. A egress-only driveway from the Maritime Village onto US HWY 101 would also be provided. All other five existing access connections onto US HWY 101 would be closed and removed.

There are three new site access roadways proposed onto Black Point Road for the Black Point Property and Maritime Village, including:

- A private frontage road that parallels US HWY 101 between Black Point Road and the Maritime Village. Existing traffic associated with the WDFW Boat Launch at Pleasant Harbor could intersect this new frontage road in a consolidated access onto Black Point Road.
- An emergency-only access into Black Point properties, located opposite the proposed golf course resort on Black Point Road. This access roadway would serve as an emergency secondary access/egress.

- A main entry roadway onto Black Point Road, approximately 0.35 miles from US HWY 101, that would serve all traffic to/from the Black Point Property.

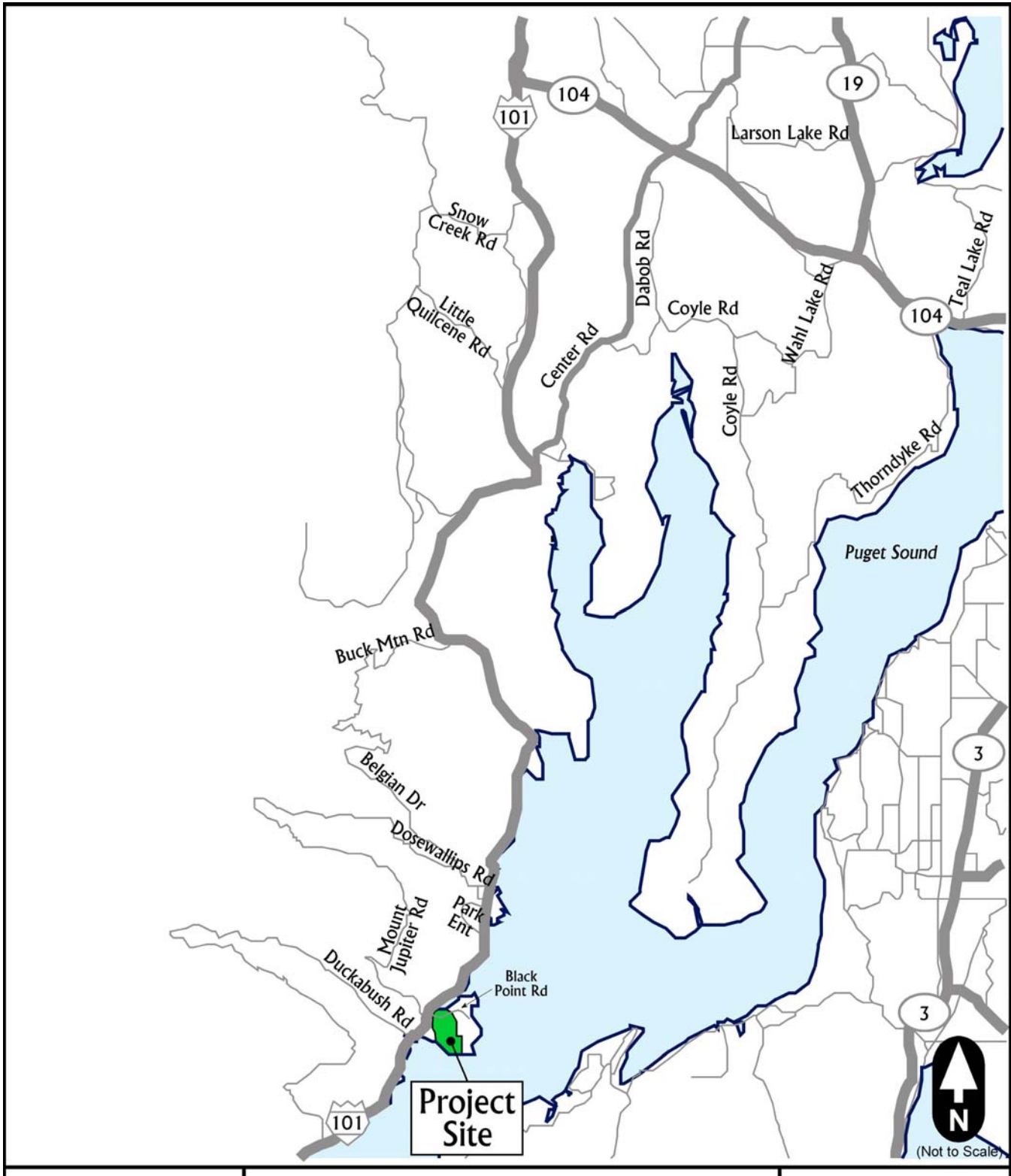


Figure 3-13 Project Site Vicinity

3.4.2 Existing Transportation Conditions

This section describes existing transportation system conditions in the study area. It includes an inventory of existing roadway conditions, traffic volumes, intersection levels of service, collision history, public transportation services, nonmotorized transportation facilities, and planned roadway improvements.

3.4.2.1 Roadway Conditions

The following paragraphs describe existing arterial roadways that would be used as major routes for site access. Roadway characteristics are described in terms of number of lanes, posted speed limits and shoulder types and widths.

US HWY 101 is classified by the Washington State Department of Transportation (WDOT) as a rural principal arterial. The roadway generally consists of 2 travel lanes 11-feet wide with 3- to 10-foot paved shoulders. The posted speed limit is 50 mph in the vicinity of the subject properties.

SR 104 is classified by WDOT as a rural principal arterial. The roadway consists of 2 travel lanes 11 feet wide with 8-foot paved shoulders. The speed limit is posted at 60 mph.

Center Road north of US HWY 101 is a two-lane major collector roadway with 11-foot travel lanes and 7- to 9-foot paved shoulders. Curbs, gutters, and sidewalks are located on the west side of the street, and a raised curb is located on the east side of the street. The curb-to-curb pavement width is 38 feet. The posted speed limit is 30 mph in the vicinity of Quilcene and 35 mph further north of Quilcene.

Dosewallips Road is a two-lane minor collector roadway with 11-foot travel lanes and 1-foot paved shoulders. The speed limit is posted at 35 mph.

Dosewallips Park Entrance Road is a two-lane, 20-foot local access roadway. The posted speed limit is 10 mph west and 5 mph east of US HWY 101.

Black Point Road is a two-lane local access street, with existing demand of less than 300 daily vehicles. The Jefferson County Public Works Road Log identifies 24 feet of pavement and 3-foot shoulders. However, based upon measured conditions in the field by Transportation Engineering Northwest (TENW) at several points along Black Point Road (in the vicinity of all proposed access points), the total pavement width ranges between 26 and 27 feet in width with 1- to 3-foot grass/gravel shoulders. The speed limit is posted at 35 mph. Black Point Road was constructed between 1974 and 1975, with a structural section of 12 inches of Class B gravel base overlaid with 2 shots of bituminous surface treatment.

Old Black Point Road is an undefined County Road that potentially serves as the first 0.04 miles of the existing entrance into the K.O.A. campground on the subject properties. According to the County Road Log, it intersects Black Point Road at approximately 0.05 miles from US HWY 101 and was established as a 12-foot of right-of-way. No record of this right-of-way is noted on recent property Alta surveys or title reports.

Duckabush Road is a two-lane minor collector roadway with 11-foot travel lanes and no shoulders. The posted speed limit is 25 mph.

3.4.2.2 Existing Traffic Volumes

Daily traffic volumes represent the number of vehicles traveling a roadway segment over a 24-hour period on an average weekday. Peak hour traffic volumes represent the highest hourly volume of vehicles passing through an intersection during a typical 4-6 p.m. peak period. For the purposes of this traffic study, the p.m. peak period was used as the peak hour since the proposed project would generate the highest traffic during this period. Existing channelization and traffic control at all study

intersections is provided in Appendix 6. Figures 3-14 and 3-15 show existing daily and p.m. peak hour traffic volumes.

Daily traffic volumes were obtained from WDOT. Traffic Count Consultants Inc. also conducted daily traffic counts on US HWY 101 (south of Quilcene and south of Brinnon) and Center Road, including p.m. peak hour turning movement counts at all study intersections in August/September 2006 (traffic counts are provided in Attachment A). Historical traffic volumes on US HWY 101 and study intersection roadways in the project site vicinity indicate a weighted average growth rate of 2 percent per year between 1998 and 2004. Furthermore, Jefferson County traffic and population forecasts in Quilcene and Brinnon estimate a 2 percent annual growth rate out to 2024. Therefore, a 2 percent per year growth rate was used to factor historical daily traffic volumes to estimate 2006 conditions.

At milepost 324.80 on US HWY 101 (approximately 15 miles south of Black Point Road), WDOT maintains a permanent traffic recorder station. During the peak summer month of August, traffic volumes recorded on US HWY 101 are approximately one-third higher than the annual average daily volumes. Traffic counts collected by TENW were collected prior to and during the Labor Day Weekend in 2006, representing a conservative period and allowing for evaluation of potential traffic impacts during a worst-case scenario of peak use of the proposed resort facilities during peak summer traffic flows in the study area.

3.4.2.3 Intersection Levels of Service

Levels of Service (LOS) serves as an indicator of the quality of traffic flow at an intersection or road segment. The LOS grading ranges from A to F, such that LOS A is assigned when minimal delays are present and low volumes are experienced. LOS F indicates long delays and/or forced flow. Appendix 6 summarizes the delay range for each LOS at unsignalized intersections. The methods used to calculate the levels of service are described in the updated 2000 Highway Capacity Manual (Special Report 209, Transportation Research Board). The measure of effectiveness for unsignalized intersections, an LOS and estimate of average control delay is determined for each minor or controlled movement based upon a sequential analysis of gaps in the major traffic streams and conflicting traffic movements. In addition, given that unsignalized intersections create different driver expectations and congestion levels than signalized intersections, their delay criteria are lower. Control delay at unsignalized intersections include deceleration delay, queue move-up time, stopped delay in waiting for an adequate gap in flows through the intersection, and final acceleration delay.

LOS standards in Jefferson County are LOS C for rural roads and LOS D for all other roads.

LOS on State Highways is LOS C for US HWY 101 and SR 104.

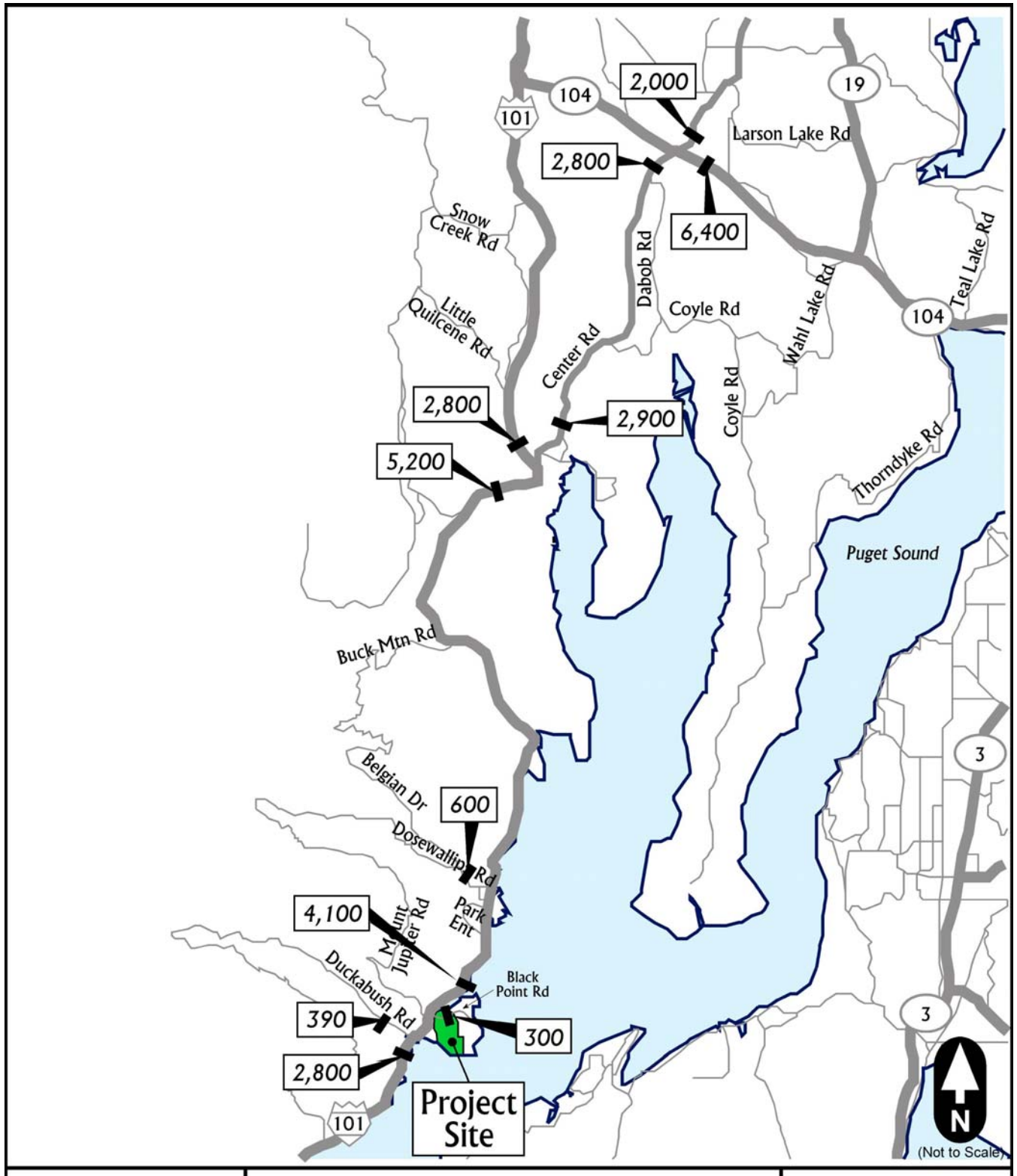


Figure 3-14 2006 Existing Daily Traffic Volumes (from WDOT tables)

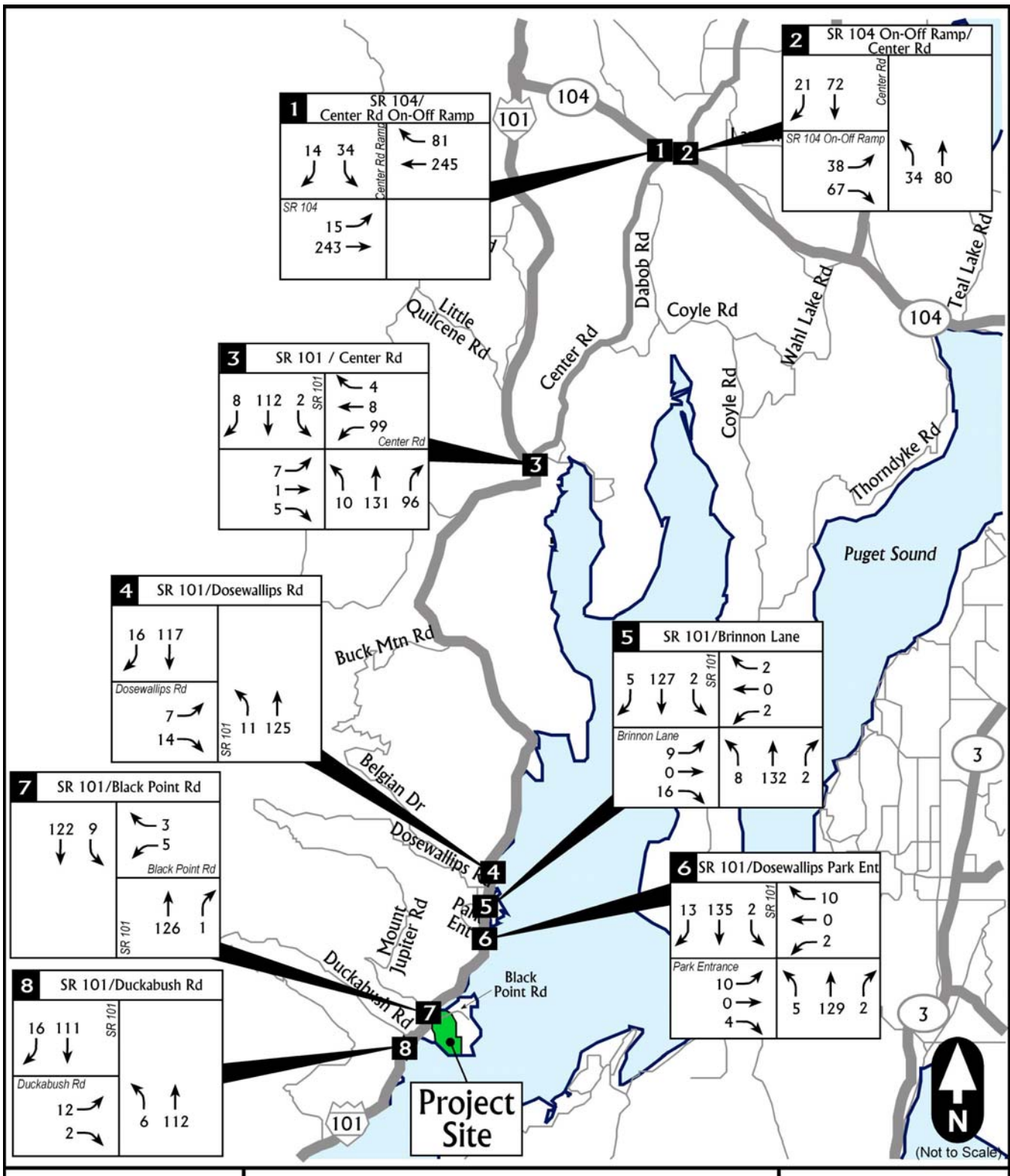


Figure 3-15 2006 Existing P.M. Peak Hour Traffic Volumes

Existing p.m. peak hour LOS at study intersections are summarized in Table 3-6. All intersections currently operate at LOS B or better. Detailed LOS summary worksheets are provided in Appendix 6.

Table 3-6: 2006 P.M. Peak Intersection Levels of Service

Unsignalized Intersections	Control Type	LOS	Average Delay
#1 – SR 104 at Center Road Ramp	<i>EB Left</i>	A	8
	<i>SB</i>	B	14
#2 – SR 104 Ramp at Center Road	<i>EB</i>	B	10
	<i>NB Left</i>	A	8
#3 – US HWY 101 at Center Road	<i>EB</i>	B	10
	<i>WB</i>	B	12
	<i>NB Left</i>	A	8
	<i>SB Left</i>	A	8
#4 – US HWY 101 at Dosewallips Road	<i>EB</i>	A	10
	<i>NB Left</i>	A	8
#5 – US HWY 101 at Brinnon Lane	<i>EB</i>	A	10
	<i>WB</i>	B	10
	<i>NB Left</i>	A	8
	<i>SB Left</i>	A	8
#6 – US HWY 101 at Dosewallips Park Entrance Road	<i>EB</i>	B	11
	<i>WB</i>	A	10
	<i>NB Left</i>	A	8
	<i>SB Left</i>	A	8
#7 – US HWY 101 at Black Point Road	<i>WB</i>	A	10
	<i>SB Left</i>	A	8
#8 – US HWY 101 at Duckabush Road	<i>EB</i>	B	10
	<i>NB Left</i>	A	8

Note: Analysis based on HCS 2000 results using HCM 2000 control delays and LOS

A project-specific LOS evaluation update will be required at the time of the preliminary plat application to identify specific mitigation requirements, but the studies done at this stage show traffic at all levels and affected intersections operating well within acceptable limits and no significant capacity improvements are anticipated as a result of the project.

Significant right of way and intersection improvements will be required at the immediate vicinity of the project to accommodate left turns and the revised access to the master plan area reducing the overall number of entry points onto US HWY 101. Design of these sections and WDOT approval for all work on State Right of Way is required at the time of preliminary Plat approval.

3.4.2.4 Collision History

The frequency and severity of collisions are commonly weighted against speed, volume, and functional classification of a roadway segment or intersection. These variables are considered in determining if a certain location has an unusually high collision rate. The average annual collision rate is calculated by summing the total number of collisions that occurred at a specified intersection or roadway segment during the past three years and dividing the total by three. Collision data for an intersection is also measured by collision rates per million entering vehicles (MEV). Collisions per MEV reflect the number of vehicles traveling through an intersection, providing a different indication of design-related versus volume-related incidences.

Table 3-7 summarizes historical collision data as provided by the WDOT for the most recent 3-year period between January 1, 2003 to December 31, 2005 at all study intersections. There have been no fatal collisions within the project site vicinity in the most recent 3-year period. There were no reported collisions at US HWY 101 and Center Road, US HWY 101 at Black Point Road, SR 104 Ramp at Center Road, and SR 104 at Center Road Ramp. All study intersections have an average annual collision rate equal to or less than 1.0 and a collision rate per MEV equal to or less than 0.88. None of the study intersections are considered to be high collision locations.

Table 3-7: Intersection 3-Year Historical Collision Rates

Intersections	Fatal Collisions	Injury Collisions	PDO Collisions	Total Collisions	Average Annual Collision Rate	Collision Rate per MEV
#1 – SR 104 at Center Road Ramp	0	0	0	0	0.0	0.00
#2 – SR 104 Ramp at Center Road	0	0	0	0	0.0	0.00
#3 – US HWY 101 at Center Road	0	0	0	0	0.0	0.00
#4 – US HWY 101 at Dosewallips Road	0	0	1	1	0.3	0.31
#5 – US HWY 101 at Brinnon Lane	0	0	1	1	0.3	0.30
#6 – US HWY 101 at Dosewallips Park Entrance Road	0	1	2	3	1.0	0.88
#7 – US HWY 101 at Black Point Road	0	0	0	0	0.0	0.00
#8 – US HWY 101 at Duckabush Road	0	1	1	2	0.7	0.71

Source: WDOT Standard Accident History Detail Report, Provided August 2006 for period between January 1, 2003, to December 31, 2005.
MEV - Million entering vehicles.

As with the traffic volume data, traffic collision data will be reviewed in conjunction with the preliminary plat to assure the plat is approved based on the most current data. But the table shows no significant issues that need to be addressed during platting other than the standard road design and ingress and egress requirements common to plat review and approval. US HWY 101 does have a history of accidents due to road alignment and grade and due to excessive speed. Caution must be exercised in connection with any development west of US HWY 101, particularly development which would increase crossing movements as the intersection at Black Point road does have severe limits to accommodate crossing traffic. Alignment of entrances to any development west of US HWY 101 will have to be viewed by the County in the context of the planned increased traffic from the resort.

3.4.2.5 Public Transportation Services

Jefferson Transit Route 1 provides public transportation services in the area, with a stop on US HWY 101 at Black Point Road, adjacent to the project site. Route 1 provides Monday to Saturday service to Brinnon, Quilcene, and the Hadlock/Irondale/Chimacum Tri-Area. Service at US HWY 101 and Black Point Road is provided between 7:10 a.m. until 7:55 p.m. with stops every 2 to 3 hours. Saturday service is provided at the US HWY 101 and Black Point Road intersection from 8:55 a.m. until 7:10 p.m. with stops every 4 to 5 hours.

3.4.2.6 Non-motorized Transportation Facilities

US HWY 101 consists of 3- to 10-foot paved shoulders. Black Point Road provides 1- to 3-foot grass/gravel shoulders which are generally inadequate to accommodate pedestrian or non motorized traffic. US HWY 101 does accommodate significant summer bike travel, even though the highway does not have identified bike lanes. The increased vehicular travel to the resort operates well within LOS limits for US HWY 101. Riders on US HWY 101 are aware of its limitations in terms of narrow shoulders and site distances the length of Hood Canal. The internal circulation system of the resort allows riders to get off US HWY 101 in the resort area and travel through the resort. The resort traffic does not materially change that situation. The Master Plan description identifies the internal trail network planned for the resort, which is open to the public and does encourage both walking and bicycling off the State highway. The compact development of resort facilities is designed to facilitate internal circulation through nonmotorized means. If significant development were to occur west of US HWY 101, consideration should be given to safe pedestrian access, including potentially overpass crossing due to safety issues crossing US HWY 101 at Black Point Road.

3.4.2.7 Planned Roadway Improvements by others

Jefferson County's *2007-2012 Transportation Improvement Program (TIP)* identified no transportation-capacity improvement project that would be impacted by vehicular trips from the proposed project

3.4.3 Transportation Impacts

The following section describes transportation impacts the proposed Pleasant Harbor development would have on the surrounding arterial network and critical intersections in the site vicinity. The discussion includes non-project related traffic forecasts, new trips generated by the proposed development, distribution and assignment of new project trips, traffic volume impacts, impacts on LOS at nearby significant intersections, public transportation services, non-motorized facilities, and site access, circulation, and safety issues.

3.4.3.1 Non-Project Traffic Forecasts

For the purpose of this traffic analysis, year 2017 was selected as the build-out year based upon full completion and occupancy of the proposed Pleasant Harbor development. As summarized previously, historical and forecasted traffic volumes indicate an average growth rate of 2 percent per year during the relevant period. Therefore, existing traffic volumes were factored by 2 percent per year to estimate year 2017 baseline conditions without the proposed development alternatives.

3.4.3.2 Project Trip Generation

This section summarizes trip generation for the proposal. From a trip generation standpoint, all the proposed uses under the four EIS Alternatives would involve typical or traditional residential, commercial, resort, or recreational uses.

Trip generation rates compiled by the Institute of Transportation Engineers (ITE) *Trip Generation, 7th Edition, 2003*, were used to estimate daily traffic and p.m. peak hour traffic that would be generated by the EIS alternatives. Given the resort nature of the Statesman Alternative, a.m. peak hour trip generation and the associated background traffic on adjacent streets would not be significant. Therefore, to evaluate a worst-case scenario, p.m. peak hour vehicle trip generation was considered assuming peak summer traffic conditions in combination with no reductions for seasonal occupancy factors.

3.4.3.3 Statesman Plan MPR Alternative Trip Generation

The subject properties under the Statesman Plan MPR Alternative encompass approximately 250 acres and would include two main development districts: the Black Point Property and the Maritime Village. The development involves creation of a Master Planned Resort (MPR) that would include an 18-hole golf course with a 3,000 square foot refreshment center, 890 residential units, a 60,000 square foot

resort/retail/spa conference center, a 200-seat (10,000 square foot) community center, a 16,000 square foot commercial retail Maritime Village, and incorporation of an existing 285-slip marina. Appendix 6 further outlines the supporting documentation and trip generation assumptions related to this Alternative.

Based upon recommended practices and procedures in the ITE Trip Generation Handbook, a combination of average trip rates and fitted curve equations for all suites hotel (ITE Land Use Code 311), condominiums/townhouses (ITE Land Use Code 230), recreational homes (ITE Land Use Code 260), golf course (ITE Land Use Code 430), specialty retail (ITE Land Use Code 824), low-rise apartments (ITE Land Use Code 221), a 250-person conference facility (Salish Lodge Expansion activities-based approach¹), and marina (ITE Land Use Code 420) were used to estimate net new trips generated by the proposed development.

Table 3-8 summarizes estimated net trip generation by the proposed Statesman Plan MPR Alternative. An estimated total of approximately 4,100 daily and 363 p.m. peak hour vehicular trips (186 entering and 177 exiting) would be generated at full build-out and occupancy of the Statesman Plan MPR Alternative.

Table 3-8: Statesman Plan MPR Alternative - Net Project Trip Generation

New	LU Code	Units	P.M. Peak			Daily Trips
			Enter	Exit	Trips	
All Suites Hotel	311	154	28	34	62	800
Condominiums/Townhouses	230	216	76	37	113	1,200
Recreational Homes/Adult Community	260	420	45	64	109	1,300
Golf Course (acres)	430	123	4	8	12	200
Specialty Retail	824	16.5	18	26	45	700
Low-Rise Apartments	221	100	42	55	68	700
Conference Facility (Salish Lodge –max attendees)	n/a	250	25	35	60	400
Marina (existing vested use)	420	311	35	24	59	900
Gross Total Trip Generation			274	250	523	6,200
<i>Less Internal Trips - Assume 20% Total</i>			<i>-55</i>	<i>-50</i>	<i>-105</i>	<i>-1,200</i>
<i>Marina (Existing Uses)</i>			<i>-35</i>	<i>-24</i>	<i>-59</i>	<i>-900</i>
Net Project Trip Generation			186	177	363	4,100

Source: ITE Trip Generation Manual, 7th Edition, 2003, and TENW.

Given the anticipated limited buildout of supporting retail uses for resort occupants (owners, guests, or renters), trip generation rates were selected for resort residential uses that reflect trip making during the p.m. peak hour for shopping, services, and other such activities to commercial areas outside of the development. In addition, as a conservative assumption, it was assumed that 20 percent of all trips would be internal in nature; therefore, the remaining 80 percent of vehicular trips were considered to be *new* vehicle trips generated by the development, impacting the immediate vicinity street system. This internalization assumption also reflects the potential for additional trip making off-site due to limited supporting retail services within the resort.

Trip making by resort employment (property management, on-site spa, concierge, laundry/dry cleaning, golf course, and other resort hotel functions) are inherent within trip generation rates of those noted commercial or proposed uses.

¹ Source: *Salish Lodge Expansion*, Transportation Impact Study, TENW, November 2001.

3.4.3.4 Trip Distribution and Assignment

Using standard engineering practices and guidelines, new vehicle trips generated by the proposed Pleasant Harbor development were distributed and assigned to the surrounding street system based on local traffic patterns and recent traffic studies conducted in the study area and approved by Jefferson County. As shown in Figure 3-16, project trip distribution was assumed to follow these patterns from the proposed site:

- 35 percent to the east via SR 104 to Seattle and Tacoma.
- 3 percent to the west via Dosewallips Road and Duckabush Road.
- 25 percent to the north via US HWY 101 and SR 104 to the Olympic Peninsula, Port Townsend, and Whidbey Island.
- 30 percent to the south via US HWY 101 to Olympia, Tacoma, and Seattle.
- 7 percent local to Dosewallips State Park and Quilcene.

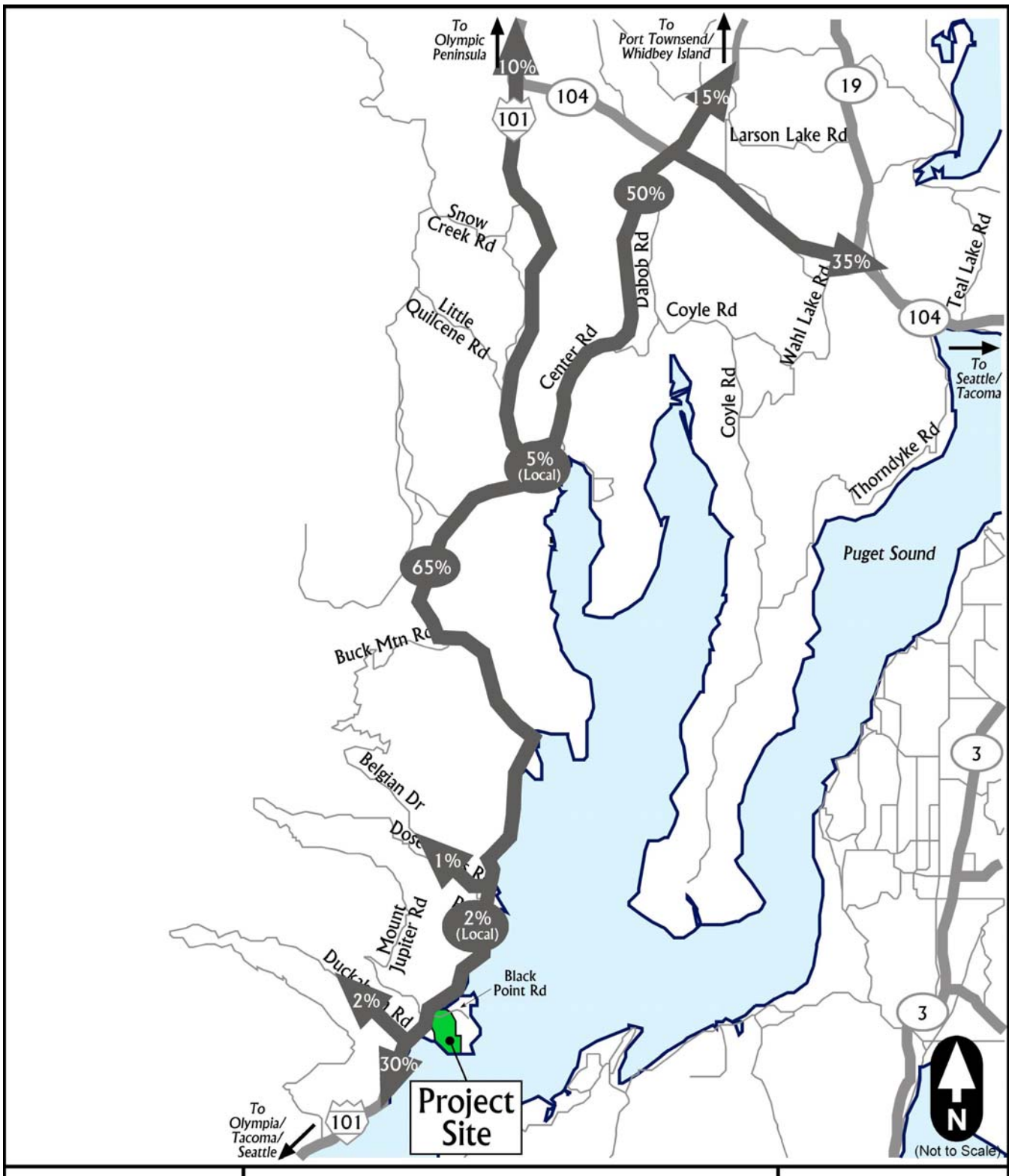


Figure 3-16 Project Trip Distribution

3.4.3.5 Traffic Volume Impacts

Traffic volumes were estimated for daily and p.m. peak hour conditions to the year 2017 without the proposed project and with the four land use Alternatives. Peak hour traffic impacts remain within

approvable LOS limits at study intersections in 2017 without the project and under all development alternatives. Detailed traffic volume forecast estimates are provided Attachment A of Appendix 6: Transportation Impact Study.

3.4.3.6 Public Transportation Impacts

Jefferson Transit Route 1 stops approximately one-third of a mile from the project site at the intersection of US HWY 101 at Black Point Road, providing transit service four times per day to the main entrance of the Pleasant Harbor properties. The applicant proposes to purchase and maintain a van or small shuttle bus available for guests and tenants to utilize on an as-needed basis for use in group trip making, coordinated events, airport shuttle, and other miscellaneous traffic. The applicant also proposes to work with Jefferson Transit in scheduling and expanding service as necessary to the resort as well as considering joint opportunities to provide layover or transit service and facilities within the site.

3.4.3.7 Non-motorized Transportation Impacts

US HWY 101 currently consists of 3- to 10-foot paved shoulders. Black Point Road provides 1- to 3-foot grass/gravel shoulders. The applicant will be required to fully fund and construct associated frontage improvements onto US HWY 101 and Black Point Road to accommodate nonmotorized facility improvements such as sidewalks, improved shoulder widths, or paved pathways internal to the project and accommodations for bicycle traffic through the intersection with US HWY 101 and project frontages. The applicant proposes to work with Jefferson County in developing a nonmotorized circulation system within the site available to the public that would not impact County or State highways and would provide for pedestrian and bicycle circulation between the two main development districts (i.e., Black Point Properties and Maritime Village).

3.4.3.8 Intersection Level of Service Impacts

As summarized in Table 3-9, intersection LOS impacts during the p.m. peak hour were evaluated at study intersections in 2017 without the proposed project and under all development Alternatives. As shown, all stop-controlled movements at study intersections would operate at LOS C or better with and without the development Alternatives in 2017. All intersections would meet adopted local and state LOS standards.

Table 3-9 2017 PM Peak Hour Level of Service Impacts

Pleasant Harbor EIS

2017 PM Peak Hour Level of Service Impacts

Unsignalized Intersections	Control Type	Without Project		No Action		Brinnon		Statesman		Hybrid	
		LOS	Delay	LOS	LOS	Delay	Delay	LOS	Delay	LOS	Delay
#1 – SR 104 at Center Road Ramp	EB Left	A	8	A	8	A	9	A	9	A	9
	SB	C	15	C	16	C	19	C	22	C	23
#2 – SR 104 Ramp Center Road	EB	B	11	B	11	B	12	B	13	B	13
	NB Left	A	8	A	8	A	8	A	8	A	8
#3 – SR 101 at Center Road	EB	B	11	B	11	B	11	B	11	B	11
	WB	B	13	B	13	B	14	C	18	C	19
	NB Left	A	8	A	8	A	8	A	8	A	8
	SB Left	A	8	A	8	A	8	A	8	A	8
#4 – SR 101 at Dosewallips Road	EB	B	10	B	10	B	11	B	13	B	13
	NB Left	A	8	A	8	A	8	A	8	A	8
#5 – SR 101 at Brinnon Lane	EB	A	10	B	11	B	12	B	13	B	14
	WB	B	10	B	11	B	12	B	14	B	14
	NB Left	A	8	A	8	A	8	A	8	A	9
	SB Left	A	8	A	8	A	8	A	8	A	8
#6 – SR 101 at Dosewallips Park Entrance Road	EB	B	11	B	12	B	13	B	15	C	15
	WB	A	10	A	10	B	11	B	12	B	12
	NB Left	A	8	A	8	A	8	A	8	A	9
	SB Left	A	8	A	8	A	8	A	8	A	8
#7 – SR 101 at Black Point Road	EB	--	--	--	--	C	16	--	--	D	30
	WB	B	10	B	10	B	13	C	18	C	22
	NB Left	--	--	--	--	A	8	--	--	A	8
	SB Left	A	8	A	8	A	8	A	9	A	8
#8 – SR 101 at Duckabush Road	EB	B	11	B	11	B	12	B	13	B	13
	NB Left	A	8	A	8	A	8	A	8	A	8
#9 – SR 101 at N Maritime Site Dr	WB	--	--	--	--	--	--	B	10	B	10
	SB Left	--	--	A	8	A	8	--	--	--	--
#10 – SR 101 at S Maritime Site Dr	WB	--	--	B	11	B	12	--	--	--	--
	SB Left	--	--	A	8	A	8	--	--	--	--
#11 – SR 101 at Project Site Driveway	EB Left	--	--	A	7	A	7	A	7	A	7
	WB Left	--	--	A	7	A	7	A	8	A	8
	NB	--	--	A	9	A	9	B	14	B	13
	SB	--	--	A	8	--	--	A	8	A	8

Note: Analysis based on HCS 2000 results using HCM 2000 control delays and LOS.

3.4.3.9 Site Access, Safety, and Circulation Issues

Full build-out and occupancy of the project is anticipated by 2017. Vehicular site access would be consolidated for the Maritime Village and Black Point Property at US HWY 101 and Black Point Road under the Statesman Plan MPR Alternative. A right-only driveway from the Maritime Village onto US HWY 101 would also be provided. All other existing access connections onto US HWY 101 would be closed and removed.

There are three new site access roadways proposed onto Black Point Road for the Black Point Property and Maritime Village under the Statesman Plan MPR Alternative, including:

1. A private frontage road that parallels US HWY 101 between Black Point Road and the Maritime Village. Existing traffic associated with the State of Washington Boat Launch Pleasant Harbor would intersect this new frontage road in a consolidated access onto Black Point Road.
2. An emergency-only access into Black Point properties, located opposite the proposed private frontage road on Black Point Road, would also serve a maintenance facility and the proposed community center.
3. A main entry roadway into the resort on Black Point Road, approximately 0.7 miles from US HWY 101, that would serve all traffic to/from the Black Point resort property.

The internal roadway within the development would provide adequate on-site, two-way circulation. The applicant would be required to fully fund and construct the necessary site driveways and associated improvements onto US HWY 101 and Black Point Road.

As noted in the Section 3.4.2.1, Black Point Road was originally constructed approximately 20 years ago with a 12-inch Class B gravel base and two shots of bituminous surface treatment. Based upon increased traffic loads during construction and at full buildout and occupancy, the structural section and roadway do not meet current road standards for a collector and would be brought up to current standards during final plat development for the golf course.

3.4.3.10 Access Management Standards

Access management standards identified in the *Washington Administrative Code (WAC) Chapter 468-52-040-2 – Highway Access Management – Access Control Classification System and Standard* were evaluated in relation to the proposed action. US HWY 101 in the site vicinity is classified as a Class 2 facility under WDOT's access management standards. Based on proposed closure of all existing access connections into the Maritime Village area, the proposed private access connections would be located more than 660 feet away from other existing private access connections. Therefore it complies with minimum access management standards.

3.4.3.11 Marine Resort Internal Access

The internal circulation road between the Maritime Village and the golf course permits circulation without traversing US HWY 101. All traffic exiting on the one-way street north of the Maritime Village shall be directed north bound only on US HWY 101 under the current proposal. At the project level detailed designs for circulation must be approved by both Jefferson County and WDOT.

3.4.4 Mitigation Measures Transportation Summary

A review was conducted of vehicular trip generation, public transportation and nonmotorized transportation impacts, and site access and safety issues of the EIS Alternatives considered under the Pleasant Harbor DEIS. Based upon this traffic impact analysis, the following mitigation measures will be required as part of a preliminary plat approval for each project phase.

- Fully fund and construct associated improvements for Black Point Road to meet County standards from US HWY 101 to the project entrance.
- Provide adequate site distance to the east of the proposed main site driveways onto Black Point Road and the egress from Maritime Village in US HWY 101 to improve and maximize entering and exit sight distance.
- At the US HWY 101 and Black Point Road intersection, provide a southbound left-turn lane as part of project development in all scenarios except the no action alternative. With the Statesman proposal, the expansion of the existing T-intersection would also provide for a median refuge area for left turns from Black Point Road onto US HWY 101.
- Provide a northbound right-turn pocket or taper at US HWY 101 at the Black Point Road intersection under the Statesman proposal.
- Residents of the Maritime Village shall be given access to the golf course resort without traveling US HWY 101. A detailed traffic design to accommodate traffic on US HWY 101 returning to the resort must be developed, with further traffic analysis and design approval by WDOT and Jefferson County.
- Reconstruct the Black Point Road approach to US HWY 101 with adjacent left turning lanes, a widened approach onto US HWY 101, and an "entry treatment" on Black Point Road at US HWY 101. The proposed site access concept would also include a consolidated intersection onto Black Point Road with a realignment of the WDFW boat launch at Pleasant Harbor.

- Provide all access roads and internal roads available for public use to County road standards. Private drives may be to a lesser standard approved by the Public Works Department and emergency service providers during the preliminary plat phase if desired by the applicant.
- Provide an internal pathway and circulation system within the site that would not impact County or State highways, would provide for pedestrian and bicycle circulation between the two main development districts, and would allow US HWY 101 bicycle traffic bypass through the resort (i.e. Black Point properties and Maritime Village).

In addition, the preliminary plat approval for the golf course portion of the resort should evaluate trip management plans as an alternative to simple roadway expansion. Such plans may include:

- Provide a van or small shuttle bus for guests and tenants to utilize on an as-needed basis for use in group trip making, coordinated events, airport shuttle, and other miscellaneous traffic. All such services shall be coordinated with Jefferson Transit to schedule expanded service as necessary to the resort as well as consider joint opportunities to provide layover or transit service and facilities within the site.

3.4.5 Transportation: Responses to DEIS Comments

Responding to comments by Jefferson Transit (228), Jefferson County Public Health (284), Germaine (129); Beattie (133), Mitchell (212), Peterson (260), Moore-Lewis (305), Lopez (272), Hendricks (270).

Transportation: Additional public transportation links would be required as noted by Jefferson Transit. Transit-related issues are part of the project-level review for each phase and would be addressed based on project-specific proposals.

The emergency access is for the resort and does not affect other homes in the area served by public roads outside the resort.

Increased boat traffic: The commentator is correct that the resort provides a magnet for marina use. Early on there was discussion of increasing the size of the slips. At the present time, however, there is no plan to make any changes to the size or configuration of the slips in the marina. Existing facilities would be upgraded to repair obsolete or contaminated floats and walkways (Tunicate eradication program). A marina operations plan is required to identify responsibility for mitigation programs, including enforcement of no discharge rules, boater education, and the harbor monitoring and adaptive management program all provide a basis for ongoing monitoring and adjustment to address issues that may arise.

Van or shuttle service could certainly serve local residents as well as the resort. This is a program to be explored at the project level as such services are identified.

The specifics of the shuttle service have not been addressed at the planning stage, but would be part of the permit-approval process. The issues identified (JCHD #6) would certainly be part of the consideration.

There are no present plans for flight, charter, or helicopter service. At the project level, if facilities are proposed to facilitate such services, detailed environmental review of the specific proposal would be required.

Road runoff is a concern to potential pollution. The new impervious surfaces at the resort are governed by County and state water quality manuals that require capture and treatment. At Pleasant Harbor, one benefit of the proposal is the capture and treatment of road runoff presently traveling untreated to the bay.

Details as to truck traffic and construction traffic would be addressed in the phasing plans and the specific operational plans as the details of a specific proposal are reviewed at the project level. Specific mitigation can then be addressed to fit conditions at the time the traffic is anticipated. Concerns about

increased traffic due to the bridge closure, and the remote nature of the resort relative to supply sources have been identified and would be issues in any phase of traffic impact assessment.

The limitations of US HWY 101 for bicyclists are noted. The road does not provide adequate shoulders. The resort provides a refuge and safe transit within and through its facility.

It is reasonable to assume that some traffic from the facility may transit to Clallam County, as well as Mason and Kitsap Counties. The project-level traffic impact analysis for each phase will address specific traffic patterns anticipated in the context of the demands from the phase proposed as well as the overall impacts.

The FEIS acknowledges that there have been fatalities on US HWY 101 and that WSDOT is making repairs and using speed limits, safety warnings, and other traffic control devices to manage traffic on US HWY 101. The road is the sole access in and out of Brinnon, and the resort does operate within the LOS levels established by the State for utilization of the state highway system, including US HWY 101. Specific turn lane analysis is a function of project-level traffic design and will be taken into account at that time.

3.5 Public Services (including tax burden, rescue services, and health services)

The County Scoping Notice addressed three issues for examination under the Public Service section (1) fire, (2) police, and (3) schools.

3.5.1 Fire Protection and Emergency Medical Services (EMS)

Black Point and Pleasant Harbor are located within Jefferson County Fire Protection District (JCFPD) #4, which provides both fire protection and EMS. District #4 serves approximately 131 square miles and operates out of three strategically located fire stations. It is staffed by 1 full time paid Fire Chief and 21 volunteer firefighters, including firefighters with emergency medical training (EMT).

3.5.1.1 Equipment and Resources

Station 41 serves as Fire District #4 headquarters and administrative offices and is located on School House Road in Brinnon proper. All district administration is conducted from this location. This station is staffed by the Chief Monday through Friday - 9 to 5pm. In the event of an emergency, the primary response unit will come from station 41. Volunteer crew members respond from their residences to their assigned stations. Emergency equipment at this station includes the following:

- 5,000 gallon Tanker Trailer
- 2000 GPM Rescue Pumper
- ILS Ambulance (intermediate life support)
- Type 1 Brush Unit
- Chief's Car
- Marine Unit (18 foot boat)

Station 42 is located at the south end of the District adjacent to the Duckabush River at 51 Shorewood Drive. This station is located just south of the project site. Equipment at this station includes:

- 1500 gpm Class A Pumper
- ILS Ambulance (intermediate life support)

Station 43 is located at the north end of the district at the base of Mt. Walker on Bee Mill Road. Equipment housed at this station includes:

- 1,000 gallon Pumper
- BLS Ambulance (basic first aid)

District #4 also has mutual aid agreements with surrounding jurisdictions, fire districts, and emergency health service providers. Mutual aid agreements are in place with the following Fire Districts and emergency providers:

- Fire: East Jefferson Fire & Rescue (JCFPD #1)
 Port Ludlow Fire & Rescue (JCFPD #3)
 Quilcene Fire Dept. (JCFPD #2)
 Discovery Bay Fire Dept. (JCFPD #5)
 Mason County Fire #17
- EMS: Port Ludlow Fire & Rescue (JCFPD #3)
 Mason County Medic One
 Olympic Ambulance
 Airlift North West
 Quilcene Fire Dept. (JCFPD #2)
 Discovery Bay Fire Dept. (JCFPD #5)
 East Jefferson Fire & Rescue (JCFPD #1)

In addition, District #4 can draw on resources from fire districts in Clallam County, Kitsap County, and Mason County through an inter-local agreement and the Olympic Peninsula Mobilization agreement.

3.5.1.2 Demand for Emergency Services

Table 3-10 below summarizes the emergency call volumes received in District #4 by type from 2003 through July 2007. Note that this does not include service calls for such things as patient assists, investigations, and complaints. Average response time from the Brinnon Fire Station 41 is between two and three minutes.

Table 3-10 EMS Demand

	Fire	EMS	Transports
2003	81	144	95
2004	43	149	73
2005	63	151	95
2006	84	188	102*
2007	51	114	60

* Total as of June 2007

Emergency call volumes increase significantly with the summer season. This increase begins in April and May with the return of people from out of state who have summer homes in the Brinnon/Black Point area. It continues with the end of the school year as families in-state take extended vacations on their local properties, and as more people come to the area to take advantage of the State parks and other recreation opportunities. It should be noted that the State park system eliminated parking fees in 2006, and as a result there has been an immediate increase in the use of local State parks. This will likely result in a permanent incremental increase in the number of summer season emergency calls.

On average EMS calls account for approximately two-thirds of the yearly volume. A majority of these calls involve people who are 55 years of age and older. The Brinnon/Black Point area has an aging population, both in the permanent residents and those that own seasonal residences. This trend is expected to continue as more vacation homes are developed and as people retire to live in the area. Emergency calls from this age group typically result from such things as someone falling, a reaction to changes in medication, and heart attacks. It is expected that these types of calls will increase as more people in the 55 years and older age bracket are added to the local population.

District #4 crews must bring their own water when responding to a fire anywhere in the district. The water is transported in the tanker and/or pumper noted above in the list of equipment. Both of these vehicles are standard size fire vehicles, including the two pumper vehicles used to extinguish fires. This places two limitations on District #4 crews. First, narrow steep roads can make it extremely difficult for these vehicles to get to a fire and maneuver once there. Second, since the water must be transported, there is a limited amount of water on hand to fight a fire. In the event of a very large fire, the water supply could quickly run out. In these situations, District #4 crews would have to be assisted by adjacent fire districts. An additional limitation is that existing equipment will only allow crews to mount rescue and fire fighting operations on buildings two stories in height.

NFPA standards call for 1.5 times building height for a collapse zone and 10-15 foot ladder approach to all buildings. Final designs shall incorporate fire code requirements with approval of the local fire authority.

The proposed development utilizes a number of large water containment areas onsite. This water is Class A treated water used for irrigation (recharging the aquifer), the Firewise program for spray irrigation of natural areas, and non-potable water for toilet flushing. The ponds are excellent resources in emergency situations for drafting sites and/or dry hydrants for fire operations.

3.5.1.3 Pleasant Harbor Marina

The existing Pleasant Harbor Marina complex poses a particular challenge for District #4 firefighters. The marina's piers and slips were constructed in two parts. The newer, northern portion has concrete piers and a dry stand-pipe, to which fire crews can connect and pump to the existing dock fire main system. The stand-pipe system needs to be projected throughout all modification and upgrades to the site and extended to the whole marina as docks are replaced.

In addition, the existing access road into the marina complex is very narrow, steep, with tight switchbacks and no turnaround capabilities. There is only one way in and out. As a result, there is no effective access for the water tankers and pumpers to reach the marina. Fire crews would have to station these vehicles above the complex and run hoses down slope and between buildings to reach fires in the marina and lower parts of the property.

The proposed development has greatly improved the access/egress capabilities for emergency vehicles, including fire hydrant connections with hose access on north and south sides.

3.5.1.4 Impacts

Increased Emergency Services and Facilities

Development of the Master Plan will add an additional 80 permanent residential units to the community and 52 staff apartments. Transient population is estimated to be an additional 1500 people at any given time to the service demands on District #4. The average age of the permanent and seasonal occupants is likely to be in the 40s or older, and it is expected there would be a corresponding increase in the number of EMS calls coming from the proposed resort population.

The building envelope constructed at the resort will be larger than the predominantly single-story homes and the few smaller two-story structures found in the rest of the District. Simply put, larger buildings create the potential for larger fires. Without adequate onsite fire flow, a large fire in one of these buildings could quickly exceed the District's current capabilities. In addition, the proposed Condo-tel/conference center building would be three stories from the north exposure, but five stores on the golf course side.

All buildings will meet International Building Fire Code requirements, as well as state standards where applicable. Fire service will be appropriate to building type and shall address fire suppression, access, and fire safety for the project.

The water system designed for the proposal will be required to establish adequate and sustainable fire flow as part of its approval. Site planning, emergency vehicle access, roadway design, and hydrant locations will follow applicable fire access standards and District #4 local fire authority needs assessment.

An emergency service memorandum of understanding shall be entered into with the service providers and address specifically how EMS services shall be provided to the resort facilities.

To address the emergency access issues at the existing marina complex, the redevelopment of the Maritime Village will include a new road to this part of the proposal (see site plan at Figure 3-17). The entry would be at Black Point Road and run one way northeast parallel to US HWY 101 and on the upland side of the proposed buildings, exiting onto US HWY 101 immediately north of the Maritime Village (see Figure 3-17). This would eliminate the existing narrow road and allow emergency vehicles direct access to each of the proposed buildings. The site will also be designed to allow fire crews access between buildings. Since the water system will extend to this part of the proposal, fire hydrants will be installed at the marina consistent with local fire authority approval. For the golf course portion of the site a secondary emergency access point is proposed for emergency vehicles only, and the closed ends of all cul de sacs will be connected or linked with proposed pathways of 10 foot width and controlled knock out ballards to permit fire access to all buildings from two directions.

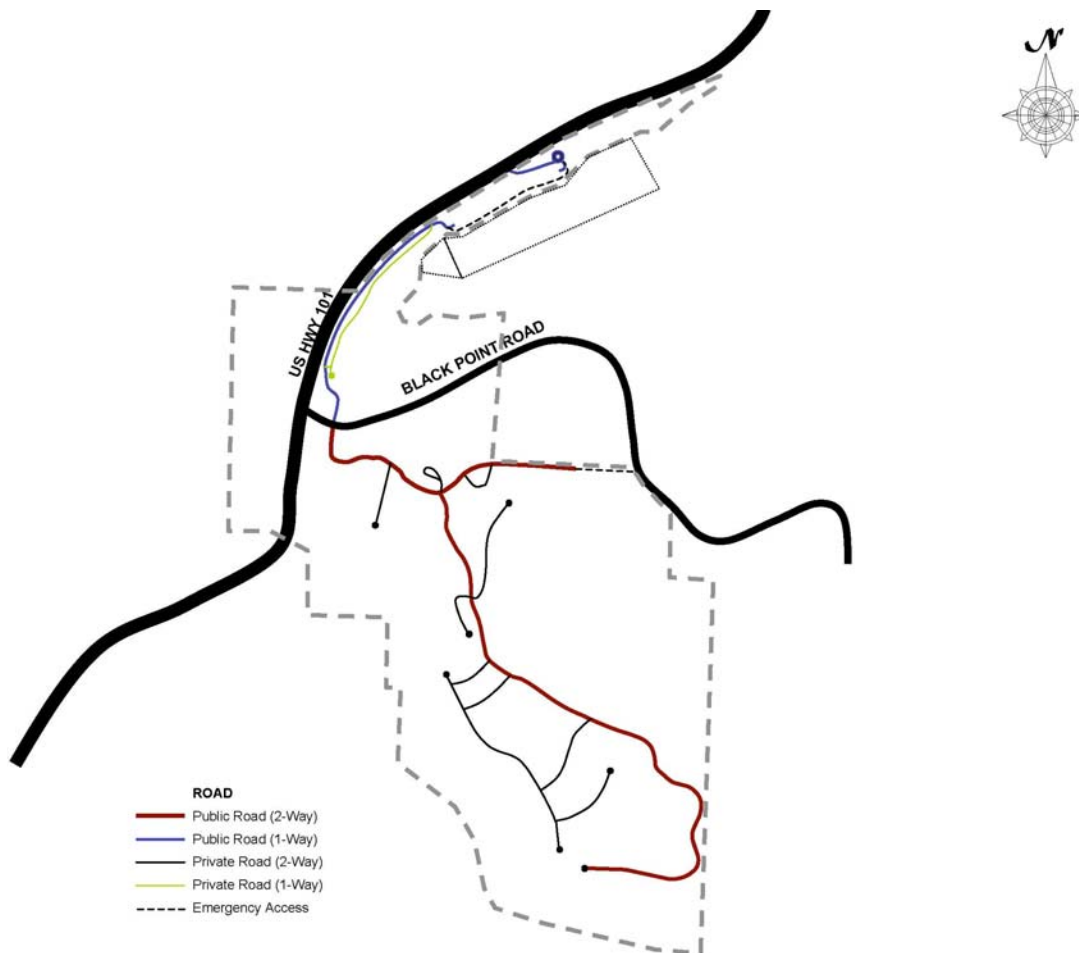


Figure 3-17 Private Internal Road Network

Increased Equipment and Facilities

The winter or permanent population is projected to increase 200 to 300 people as a part of the resort development, which would translate into a few additional calls, but is well within the capacity of the

existing facilities and services and anticipated area growth. During the summer, the resort population of between 1500 and 2000 people will strain existing personnel and services and equipment for which specific mitigation will have to be provided.

A condition of any final plat approval for the resort facilities will be a memorandum of agreement with Fire District #4 to assure adequate funding facilities and personnel to address the increased need created by the resort. The memorandum shall take into consideration the increased tax revenue to the system provided by the resort and the means of providing an agreed upon incremental personnel facilities or equipment not covered by the increased revenue.

3.5.1.5 Fire Protection and Emergency Service Mitigations

Any preliminary plat for the development of a portion of the resort shall require the following:

- Ensure the onsite water system will provide for adequate sustainable fire flow.
- All resort buildings to include internal sprinkler systems with FDC connections.
- Incorporate Firewise site design standards in the layout of the proposed resort, as appropriate and approved by the local fire authority.
- All subsurface parking will have to provide fire systems, including air handling, water, and emergency access and egress.
- Install hydrants, two portable fire pumps with hoses and related fire suppression equipment at the marina and maintenance area as approved by the local fire authority.
- Develop an “emergency action plan” with the Fire District in conjunction with predevelopment, development, and operation to assure clear lines of responsibility and response in the event of any incident requiring emergency response.
- Any development of the existing marina complex as part of an MPR shall include improving emergency vehicle access to this portion of the resort.
- Through a memorandum of agreement with District #4, provide the equipment necessary to mount rescue and fire fighting operations on any structure over 18 feet from ground level, including but not limited to the Condo-tel/Conference Center Building.
- Enter into an “action plan” with the local fire authority at District #4 to assure coordinated control of additional services necessary to achieve an adequate level of service to the resort.
- Provide a back-up electrical power supply to the resort to ensure continued operation of emergency systems and water supply during any outage.
- Comply with the provisions of a memorandum of agreement with local service providers to address service equipment and personnel needs created by the resort, taking into consideration increased tax revenues from the resort activity.
- Enter into a memorandum of understanding with the local fire authority to address the following issues:
 - “Firewise” design standards
 - “Emergency action plan” for predevelopment and operational service for each phase of development
 - Provide necessary facilities to mount rescue and fire fighting operations in all phases of the resort
 - “Action plan” for coordinated control and additional services

3.5.2 Police Protection

Police protection is provided by the Jefferson County Sheriff's Office, which serves all of the unincorporated areas of the county. The Sheriff's Office is located at the Justice Center in Port Hadlock

and also maintains an office at the Courthouse in Port Townsend, a substation in Clearwater, and an annex in Quilcene. Personnel include 47 full-time positions, 12 reserve deputies, and 20 volunteers. LOS standards for police facilities in the County Brinnon Subarea Plan MPR Alternative, indicates that staffing and facilities are adequate to serve the increase in population under all three Alternatives.

Deputies are dispatched to the Brinnon/Black Point area from the Justice Center in Port Hadlock or from the annex in Quilcene on days that it is staffed. The Brinnon/Black Point area is in the Sheriff's patrol district S5. In 2005 the Sheriff's Office reports responding to 403 calls in the district, accounting for 6% of all calls in unincorporated Jefferson County. It appears that the majority of calls involved traffic violations, DUI arrests, and burglaries.

The Sheriff's Office also maintains a Marine Division that is currently staffed by one full-time sergeant and one patrol deputy, and can also call on three reserve deputies. Through a contract with Washington State Parks and the United States Coast Guard, the program receives annual funding, which covers the costs of manpower, training, equipment, and other expenses. The Marine Unit utilizes one 24' patrol boat, which is fitted with equipment and electronics required for inter-agency coordination with multiple types of emergencies, and provides a platform for the Sheriff's dive rescue/recovery team.

The proposed resort development will maintain onsite security staff.

3.5.2.1 Emergency Services Impacts

The population projections for emergency services apply equally well to the need for additional police services. The resort is located at the southern end of the County and coordination to address the need for additional services will be important. Provision of police response to the community is a function of the County Commissioners and the County Sheriff and is most commonly a budget issue. In recognition of the increased property tax, sales tax, and other revenues from the resort, and the resulting economic benefit to the community planned by the County in attracting and providing for a resort in this area, the County needs to address the application of those revenues to provide additional services to the area. The resort has made available an office at the Maritime Village for a Sheriff staff member as determined necessary.

The applicant has proposed a development agreement with the County and the State of Washington to assure some of the funds created by the resort will be retained in the Brinnon area to provide police and other services.

3.5.2.2 Mitigation

Project Level: Permit approval for both the marina and the golf resort shall address security-related issues, and shall include specific mitigation which may include:

- Controlled access at the entry and exit points of the resort and docks.
- Onsite security and surveillance systems for the protection of resort guests, residents, and property coordinated with local service providers to assure appropriate communication and control systems are in place.

Community level: Explore the use of a development agreement or other assurance to provide a mechanism for the County to provide some public safety funding to the Brinnon area from the revenues received from the resort to assure that the funds will not be diverted to the more populous north county.

3.5.3 Health Services

The Brinnon/Black Point area does not currently have a medical facility in the local community. The area is served by Jefferson General Hospital in Port Townsend and Mason General Hospital in Shelton. A medical clinic has been established north in Quilcene, supported by Jefferson General Hospital. This clinic may be expanded to include counseling for mental health, substance abuse, and other related services.

The proposal includes 500± square feet of clinic space in the development of the Maritime Village for a certified nurse and/or a general practitioner. Selected staff will also be provided with basic emergency medical training.

3.5.3.1 Mitigation

Project-specific mitigation shall be addressed in the public services memorandum of understanding (MOU), which shall address reasonable site needs and the means of providing and paying for services. The MOU shall be in place prior to issuance of building permits for development of resort facilities.

3.5.4 Schools

The Brinnon/Black Point area is located within the Brinnon School District #46 and serves grades K through 8. Students of high school age have choices of schools in adjacent districts. The Brinnon School has four regular classrooms, two portable classrooms, and a computer room, along with a library, gym, and administrative offices.

In 2000 the school district had a total enrollment of 74 students. This declined to a low of between 30 and 40 students in 2005, but rose to 56 during the 2005-2006 school-year. School enrollment for 2006-2007 was 49, and the expected enrollment for the 2007-2008 school year is 45.

Seasonal recreational homes are not expected to add students to the school district, so no impacts are expected from that component of the resort population. Since the proposed apartments are intended for both resort staff and Brinnon residents, it is expected that some of these units would be occupied by families with school age children.

The Capital Facilities Element of the County BSAP MPR Alternative has established an LOS standard for the Brinnon School of 23 students per classroom. With four regular classrooms and two portable classrooms, the school can accommodate up to 138 students based on the established LOS. For the last six years the school has had excess capacity and the coming school year will only reach 48% of its capacity.

The resort development phase is not anticipated to provide any additional school age children since the construction crew camp is temporary quarters and most families will attend school in their home districts. As the permanent population increases (both staff and permanent residents), some increase in school age population is anticipated, though minor. Staff increases significantly for the summer and this staff tends to be single or families without children. The longer term resort families tend to be over 55 and thus have limited children of school age, particularly K-8. There is also significant turn-over in Staff positions. As a result, for planning purposes this EIS estimates a potential school age increase of 5-10 students in any given year for the Brinnon schools, and the high school age increase may only be one or two students in any year. Specific mitigation agreements with the School will be addressed as part of the preliminary plat process for the golf course.

3.5.5 Economy, Housing and Employment

3.5.5.1 Economy

In the last several decades the traditional resource-based industries have declined to the point that the south county area has seen some of the highest unemployment rates and lowest average incomes in Jefferson County. The area is in a rich natural setting close to State and National Parks and has numerous recreation opportunities such as hiking, sailing, and bird watching. It is estimated that over 500,000 people visit the Olympic Peninsula each year, but there are few tourist accommodations in the south county to attract this market. County policies and development code support the growth of a viable tourist industry by allowing limited development of small-scale tourist facilities, designating areas as Rural Village Centers, such as Brinnon, and for the development of an urban-scale resort through the MPR on Black Point.

The intent of the MPR designation at Black Point is for the creation of a destination resort that would act as a catalyst for the local economy by providing visitors a package of amenities developed in a contained setting to ensure compatibility with the surrounding rural setting.²

3.5.5.1.1 Construction Period

The resort is expected to provide more than \$300,000,000 in local construction and development costs to build the necessary facilities. Neither the Brinnon subarea nor Jefferson County as a whole has the resources or expertise to provide the construction materials and services to build on this scale. Thus, much of the material purchased on a wholesale basis will be obtained elsewhere and delivered to the site. But the County will benefit from the payroll of the project from the construction crews housed in the area and local subcontractors and laborers will certainly play a major role in the overall development program. Payroll for 100 employees during construction is estimated to run approximately \$6 million per year onsite during construction and \$2 million per year (2007 dollars) thereafter during operations. Much of that money can be expected to be spent in the Jefferson, Kitsap, and Mason County area. Some of the local markets may seek to expand to meet the increased demands, and additional services and supplies may be purchased in Port Townsend, Shelton, or the Kitsap cities, which are the nearest metropolitan areas.

3.5.5.1.2 Operational Period

Property Taxes

Property taxes provide a consistent and significant revenue stream to the local governments. The resort is expected to carry an assessed value in excess of approximately \$300,000,000, which would generate annual property taxes of approximately \$3 million per year to the community, which is divided among the districts on the following basis:

County (including roads)	25.7%
Local schools	22.7%
State levy	25.3%
Special Districts (including Fire District #4)	26.3%

Sales Taxes

The construction costs of the project are expected to generate nearly \$20,000,000 in sales tax revenue, of which approximately 25% goes to Jefferson County.

While it is difficult at the conceptual stage to quantify the additional revenue impacts, the staff salaries, and the local expenditure of funds by tourists (projected to be between \$80 and \$100 per day per family) also provide ongoing additional support for services and utility services once the resort is operational.

The ongoing revenue stream from the project from property, sales, and specialty taxes (including a hotel/motel tax on tourist facilities (presently 2%)) provide a revenue stream by which general and special public services are provided. These funds must be taken into account during the permitting approval process when addressing the need for additional mitigation impact fees or revenues.

² Socioeconomic impacts are not required to be addressed in environmental documents, but may be pursuant to WAC 197-11-448(2)(4). The materials are included because the County Comprehensive Plan and BSAP address the master planned resort as an employment/economic development program for south Jefferson County.

Input to the Economy

Economic forecasts at the conceptual stage are necessarily estimates. But materials from both Washington state and the U.S. National Park Service provide estimates or guidelines of economic activity from the proposed development.³

Occupancy Assumptions:

85% occupancy for PRIME Season [757 units]

50% occupancy for MID Season [445 units]

30% occupancy for LOW Season [267 units]

PRIME Season = 92 days (Mid June to Mid September)

MID Season = 92 days (May to Mid June & Mid September to end October)

LOW Season = 181 days (November - end April)

Total spending estimated at \$560 per day per unit spent in the area; including the \$295/day accommodation fee. Thus: \$265 for expenses other than accommodation.

Accommodations

\$295 per unit per day at 890 residential units (2.2 people per unit)

PRIME Season

757 units x \$295 = \$223,315 per/day x 92 prime season days = \$20,544,980 per/annum

MID Season

445 units x \$295 = \$131,275 per/day x 92 mid season days = \$12,077,300 per/annum

LOW Season

267 units x \$295 = \$78,765 p/d x 181 low days = \$14,256,465 per/annum

Total Accommodation Per Annum: \$46,878,745

Food/Meals

\$150 per unit per day at 890 residential units (2.2 people per unit)

LOW Season = 181 days (November - end April)

PRIME Season - Food

757 units x \$150 = \$113,550 per day x 92 days = \$10,446,600 per annum

MID Season – Food

445 units x \$150 = \$66,750 per day x 92 days = \$6,141,000 per annum

LOW Season - Food

267 units x \$150 = \$40,050 per day x 181 days = \$7,249,050 per annum

Total Food/Meals Per Annum: \$23,836,650

Alcohol

PRIME Season – Alcohol

757 units x \$15 = \$11,355 per day x 92 days = \$1,044,660 per annum

MID Season – Alcohol

445 units x \$15 = \$6,675 per day x 92 days = \$614,100 per annum

³ Economic Impacts suggested below are based on the National Park Service Money Generation Model.

LOW Season - Food

267 units x \$15 = \$4,005 per day x 181 days = \$724,905 per annum

Total Alcohol Per Annum: \$2,383,665

TransportationPRIME Season – Transportation

757 units x \$35 = \$26,495 per day x 92 days = \$2,437,540 per annum

MID Season – Transportation

445 units x \$35 = \$15,575 per day x 92 days = \$1,432,900 per annum

LOW Season - Transportation

267 units x \$35 = \$9,345 per day x 181 days = \$1,691,445 per annum

Total Transportation Per Annum: \$5,561,885

Retail TradePRIME Season – Retail

757 units x \$65 = \$49,205 per day x 92 days = \$ 4,526,860 per annum

MID Season – Retail

445 units x \$65 = \$28,925 per day x 92 days = \$2,661,100 per annum

LOW Season - Retail

267 units x \$65 = \$17,355 per day x 181 days = \$3,141,255 per annum

Total Retail Trade Per Annum: \$10,329,215

Wholesale TradePRIME Season – Wholesale

757 units x \$32 = \$24,224 per day x 92 days = \$2,228,608 per annum

MID Season – Wholesale

445 units x \$32 = \$14,240 per day x 92 days = \$1,310,080 per annum

LOW Season - Wholesale

267 units x \$32 = \$8,544 per day x 181 days = \$1,546,464 per annum

Total Wholesale Trade Per Annum: \$5,085,152

While any specific operation may vary from the estimates, an operating resort in the area is a significant source of economic activity that will necessarily involve the local community and county.

Employment

During construction it is estimated that approximately 80 to 125 people will be employed onsite periodically at any one time through the five-year construction period. It is expected that much of this basic work force can be found within the County, though certain specialized skills may require workers from outside the immediate region. The Company proposes to upgrade the existing RV facilities on a temporary basis (presently approved for 60 units) to provide temporary housing for construction workers. The number of additional workers needed in the more skilled trades is difficult to estimate and would likely come from the surrounding area and region.

Statesman estimates that upon completion, the resort would create 40 permanent new jobs. The number of seasonal employees is estimated to be 50. Therefore, during peak season there will be an estimated 90 employees. The staff housing (52, 2-bedroom apartments) will provide onsite residences for the project. Currently 310 people are in the local workforce. The jobs created by the proposal would represent a 30% direct increase in local employment. It is anticipated that seasonal employees

would typically be students with the advantage to local students who can work the shoulder seasons but students from all over the country who may wish to spend a summer working in the Pacific Northwest. Full-time employees are expected to be younger people attracted to the prospect of growing with a new business. Statesman has indicated there would be opportunity for advancement and career growth for motivated individuals.

Given the potential amount of direct expenditures in the local area, it is anticipated other employment opportunities would be created. With a predictable seasonal population and new attractive amenities on Black Point, new businesses are expected to form or locate in the immediate area. These could include such things as B&Bs, convenience gas and grocery, tour and guide services, small galleries and other art and craft facilities, restaurants and cafes, and a variety of other tourist-oriented commercial uses.

Brinnon

Brinnon proper has been designated a Rural Village Center (RVC) by the Jefferson County Comprehensive Plan. The purpose of the designation is to acknowledge the concentration of commercial and public uses, and logical boundaries were identified to allow for the infill of commercial and higher density residential uses to meet future economic and affordable housing goals.

The UDC allows a variety of retail, commercial, and residential uses within the RVC designation. Bulk and scale are controlled by limiting the footprint of individual buildings to 20,000 square feet or less, a maximum height of thirty-five feet (i.e. three stories), and no more than 60% onsite impervious surfaces. There are approximately 19 acres vacant within the 66-acre RVC designation. Development is limited by flood plain and other limitations, but Brinnon does have land within the RVC which would expect additional development. Water supply and septic limitations are the significant limiting features in the area and County health department and State requirements for adequate water supply will limit overall total development. That said, Brinnon does have room for increased retail, business and mixed use development which could reasonably flow from the proximity to a major resort.

The Rural Village Center provides the locale for additional commercial and service businesses to locate, consistent with the size and scale of a rural village, to accommodate increased demand for supplies and services by the traveling public. In addition, some recreation and service-related businesses are expected to benefit from the location of the Master Planned Resort as a result of its location in the Brinnon Subarea. None of the expected facilities would necessitate any expansion of the existing Brinnon Subarea, but rather simply reuse or add onto existing facilities.

3.5.6 Affordable Housing

The BSAP area of Jefferson County has a mixture of affordable, moderate income, and estate-type housing and properties. Of the developed residential properties, nearly half are seasonal or vacation residences and are typically not part of the rental market. Approximately 80% of the remaining are owner occupied, leaving little in the way of rental housing stock. In addition, land use regulations establish minimum lot sizes of 5, 10, and 20 acres. Large lots reduce affordability and current regulations in most cases do not allow for higher density developments in rural areas. Higher densities make individual units more affordable. While the RVC designation would allow for limited higher residential densities, this area of Brinnon is located within a mapped floodplain, limiting the size and use of septic systems and drain fields to support denser housing.

The rental housing market is particularly limited, outside the occasional vacation rental of homes on Hood Canal. Since most of the construction crews are expected to live out of the area, Statesman proposes to use the existing 60-unit RV facility onsite for construction housing. This facility would be temporary and must be in place prior to commencement of construction of the infrastructure for the project.

The creation of new permanent and seasonal jobs will impose an added demand for affordable housing locally. To offset this demand, Statesman proposes building 52 units of new multiple-family apartments

on site. Much of the staff support for the resort is seasonal or part time. Providing affordable units as part of the proposal addresses both the increased demand represented by the proposal and provides the infrastructure to support the higher densities necessary to address affordability.

3.5.7 Rural Character and Aesthetics

3.5.7.1 Rural Character

In accordance with the provisions of the GMA, the Jefferson County Comprehensive Plan Goal LNG 18.0 states that *"Rural character is defined by local rural lifestyle, opportunity to live and work in rural areas, local rural visual landscapes, resource productivity, environmental quality, and significant areas of open space."* Subsequent policies make it clear that significant amounts of open space and continued environmental quality are key components of preserving local rural character. Rural character is also to be preserved by not allowing the conversion of rural lands into suburban or urban densities or into uses inappropriate for a rural setting. The rural setting also includes development for tourist and recreational facilities and the allowance of planned resorts, urban uses in otherwise rural settings. The Brinnon Subarea Plan confirmed that the Black Point Pleasant Harbor is an area of significant amenity and could accommodate a planned resort as part of the overall rural area development.

A key element of any allowed urban use in rural areas such as master planned resorts is that the resort and its facilities not allow the extension of urban or non rural uses outside the resort area. As such local guidelines require: *"All necessary supportive and accessory on-site urban-level commercial and other services should be contained within the boundaries of the MPR, and such services shall be oriented to serve the MPR "* (JCC 18.15.126(5)).

The section must be read in the context of the Brinnon Subarea Plan and Comprehensive Plan, which suggest facilities available in the RVC of Brinnon. School facilities are in Brinnon, as are fire and emergency services. These facilities would serve the resort. The emergency services facilities may add "urban level" equipment to enable them to address the more complex challenges presented by a large resort facility. The urban sewer and water facilities in the resort may not, however, be used outside of the resort area, except to serve identified emergency health needs. They may not be used to serve any development in excess of allowed rural uses or densities.

Zoning around the proposal is residential in the form of 5-, 10-, and 20-acre minimum lot sizes for future subdivision. With few exceptions, allowed uses in these residential zones are housing and those activities that can be conducted within a residential lot, such as home occupations or those rural scale activities serving the local or tourist population.

Here, rural character is retained by scaling the size of the residential structures consistent with local construction (less than 35 feet in height); clustering the more intense development internal to the project site and at the marina where dense activity already occurs and a suburban shoreline designation suggests higher levels of anticipated activity on the shoreline; locating the hotel and Maritime Village topographically so the buildings are set into the hill and do not project above the average tree height; retaining the buffer on the shoreline; locating the bulk of the housing away from local roads and out of site from US HWY 101 except the node at Black Point Road; retaining a tree buffer along US HWY 101 adjacent to the marina; and devoting more than half of the site to open space (including the golf course), wetlands, buffers and natural areas all reduce the visual impact of the resort on the surrounding community and help retain the overall rural character of southern Jefferson County.

3.5.7.2 Densities

While the existing rural residential zoning is low density with large lots, there are pockets of residential development on and near Black Point that are more suburban in nature due to platting prior to current regulations. As a result, there is a mix of residential densities in the immediate area of the proposal. Hood Canal residential development, both north and south of the project site, has residential densities

that average 3.5 units per acre. At the northeast of Black Point around Rhododendron Lane, density is approximately 4 units per acre. Adjacent to the southwest portion of the golf course there is a small subdivision with a 7-unit per acre density.

Overall gross density for the proposal of 890 units on 256 acres is approximately 3.5 units per acre.

The densities contemplated for the majority of the proposal are less but not dissimilar to some of the existing densities found in the immediate area. The primary difference is that the vacation residences proposed for the resort are clustered into a number of townhouses or attached structures, rather than single homes on individual lots. The scale of construction is similar to the residential scale locally, however, as the residential structures are one and two story and adhere to the overall 35 foot height limits when viewed from outside of the project. Measured from the North Elevation, most units have parking under the building to reduce impervious surfaces and will have a total height not greater than 35 feet to the eave line (as will the terraced lofts that includes the major conference center, but by blending these facilities into the topography, the overall look to the north exposure is of a series of low buildings surrounded by large areas of open space).

The combination of bluffs and protected native vegetation area along the southern shoreline means the site will have little, if any, visibility from US HWY 101 or the water along Hood Canal.

The typical single-family home in the area has between 35% and 50% impervious surface to total area. By contrast, the clustered development of this project, with the protection of the wetlands and riparian buffers, and the dedication of a significant portion of the site to open space means the overall impervious surface coverage for the site is anticipated to be 20% or less.

3.5.8 Aesthetics

Aesthetics refers to the visual components of rural character: rural landscape and open space. The local rural landscape has a predominance of natural open spaces over the built environment. To be compatible with its surroundings, design and layout of an MPR needs to be done in a manner that minimizes the visibility of structures when viewed from outside of the site. The RV campground is marginally visible from the south as one travels north on US HWY 101 and from portions of the subdivisions at the mouth of the Duckabush River, and is the largest part of either of the MPR alternatives. This portion of a proposed MPR has the greatest potential for visual impact to the rural landscape.

MPR buildings on those properties adjacent to US HWY 101 would not be readily visible from the highway. Resort buildings should be constructed of natural materials and have architectural features such as pitched roofs and modulated facades for greater compatibility with the rural setting.

There is also the potential for light and glare to interfere with the character and enjoyment of the night sky, and impact adjacent properties. Lighting in any MPR alternative will be required for both safety and security. Required lighting should be the minimum necessary and shielded to eliminate glare onto adjacent properties both on and off site. Lights should be kept lower to the ground where possible and use low wattage lamps to reduce impacts to the night sky.

3.5.9 Potential Impacts and Mitigation Summary

The unavoidable impact of the proposal is that it would add complexity and intensity to the Black Point area, including visual elements, densities, and land uses. The area has historically had resort-type use on a different scale, which failed. The policy intent of the Jefferson County and Brinnon Subarea plans is to site a resort in this location to stimulate the local economy, while being sensitive to local environmental conditions and sensibilities.

The construction camp facility to accommodate construction crews in an RV camp using the Bed and Breakfast and Kaufman Home, will minimize the construction period impact on the local population and housing.

Once completed, the proposal will directly add many new permanent jobs and should indirectly stimulate additional employment. The proposal also includes 52 new units of affordable housing, which should make it possible for others to live and work in the immediate area. The onsite visual landscape will change, but a significant amount of the proposal will be in some form of open space. The golf course itself is open space and the areas between the fairways will be preserved, planted, and maintained with native trees and understory. Forested open spaces are dedicated along the bluff of Black Point. Wetland areas are also preserved and enhanced as necessary.

The dedicated open space along the bluff, along with the stands of native trees and understory between fairways, will reduce the visibility of structures in Black Point when viewed from the south. Buildings in Pleasant Harbor will not be readily visible from US HWY 101. While multi-level stories in height, the buildings are located on sites that slope down towards Pleasant Harbor. Their bulk and scale will be reduced when viewed from the highway since they are set back not less than 100 feet from the highway with natural trees shielding view lines. Buildings are visible from a south exposure of Pleasant Harbor.

The key to the provision quoted is that the Master Planned Resort not lead to suburban or urban level development in the surrounding area and that result is achieved through several techniques:

- The retention of rural area zoning on the lands outside of the Master Planned Resort.
- The additional public services shall serve the urban levels of intensity within the Master Plan area, the RVC level services in the RVC area, and the rural development in the surrounding area, and allow extension of urban level sewer utilities only in the event of a health hazard. The purpose of the regulatory restriction is to prevent a fundamental change in the overall development patterns planned for the area. Increasing the quality or quantity of services in such area as a result of the development is one of the economic benefits.
- A water facility may serve both urban and rural uses as a water system is preferable to individual exempt wells. The water system shall not be used to serve uses in the rural area in excess of that allowed by County codes for rural area development.
- The number of proposed residential units shall be no greater than 890 units, including both the resort residences and staff/affordable housing.
- The proposal shall maintain natural open spaces along the shoreline bluffs along site perimeters as is practical with golf course layout, between fairways, and the upper portion of the development.
- The proposal shall ensure retention of selected stands of significant trees along the bluff of the golf course to reduce the visibility of the site from the south.
- The proposal shall provide landscaping between US HWY 101 and the new access road proposed on the upland side of the Maritime Village.
- With the exception of the Condo-tel/conference center, with terrace lofts and the Maritime Village, all structures shall be kept to a maximum of two stories in height from higher grade elevations.
- The overall project approval shall address light and glare to reduce the projection of evening lights off the golf course and marina properties. (Reduction does not mean lights cannot be seen, but that through shielding and proper placement and orientation, the offsite impacts are minimized.)
- The proposal shall provide construction period housing and housing specifically dedicated to staff and local service personnel to reduce the impact on local housing.

3.5.10 Public Services: Responses to DEIS Comments

Responding to concerns raised by Jefferson County Public Health (284), WDOE (281, 381, 375 and 376), Stephens (127), Thompson (136), Dimino (193), Mitchell (212); Beattie (310).

The resort is located in a rural area and medical services are limited as indicated. The proposal contemplates some form of onsite facilities, but the precise nature and how such facilities would be incorporated into the local service network is an issue addressed at the project level and phasing plans. The public service Memorandums of Understanding would address the issues raised at the project-approval level.

Comment from WDOE noted—Recycling is to be a big part of "green development" for the project site and given the location and potential waste issues, ways to manage and reduce waste loads will be an appropriate part of project-level review.

The project is required to work with the schools on identified issues. The FEIS requires an MOU with affected agencies to be addressed at the time of project approval to assure adequate facilities are provided concurrently with demands, and to address specific needs created by the resort phase.

The projected growth of other recreation facilities in the area is a testament and response to the significant increased demand for public access to public facilities. Increased traffic on trails, beaches, and other public lands is projected by all resource and recreational agencies. Responsible public agencies have and are updating management plans in place to address the additional use. The resort is required to provide educational materials regarding proper use of public facilities.

The resort power needs will be addressed at the project level, by phase. Preliminary estimates identify adequate capacity for service to the area to meet the needs of the project.

3.6 Shorelines

The County's scoping notice identified four concerns directly affecting shorelines: (1) stormwater, (2) shellfish, (3) surface water, and (4) public access.

3.6.1. Shoreline Designation

All of the salt water shorelines of the Master Plan area are shorelines of the state and shorelines of statewide significance under the Washington State Shoreline Management Act, and the Shoreline Master Program for Jefferson County.

The Brinnon area shorelines are "suburban" for Pleasant Harbor and "conservancy" for the southern bluff shoreline along Hood Canal.

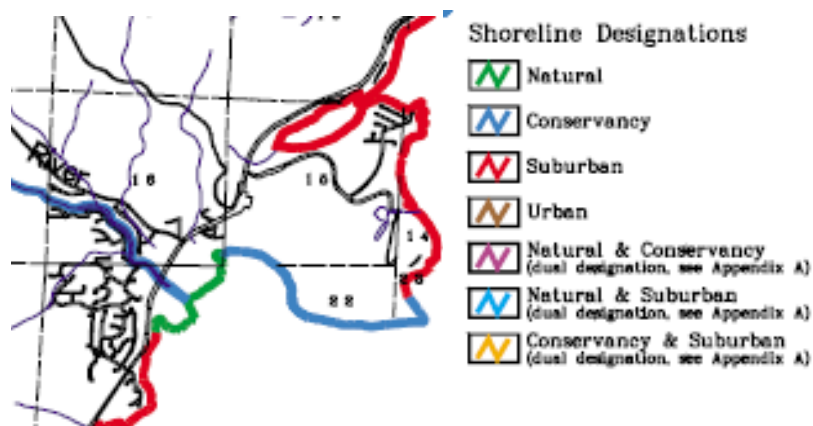


Figure 3-18 Shoreline designations

3.6.2 Shoreline Guidelines

The Maritime Village area is located within the basin and shoreline jurisdiction of Pleasant Harbor. The Harbor is designated “suburban” which is a shoreline zone that contemplates a relatively intense level of shoreline development to promote use and enjoyment of the shoreline. Historic development and expansion of the marina and the boat launch, as well as the intensity of residential development on the Black Point area are reflective of the development contemplated by this zone. The Maritime Village improvements described in the project proposal are reflective of that intensity.

A shoreline substantial development permit will be required for all development within the Maritime Village, including both marina-related commercial and limited resort housing in the waterside area.

The golf course is set back more than 200 feet from the south shore conservancy shoreline of Hood Canal, which is a significant shellfishery area. In the master plan this shoreline is dedicated to open space and no structures or golf facilities are to be constructed in the shoreline area. Site-specific wetland mitigation plans may provide for water features and wetland mitigation areas at or in the outer 100 feet of the shoreline area to enable the creation of a wetland forested edge mitigation wetland should such designs prove warranted and feasible during permit review. Any site-specific issues of such a feature would be reviewed under the project-specific environmental review for the shoreline permit required and a specific construction/operation mitigation plan shall be approved prior to construction. The dock replacement program is also subject to project-specific review.

The present degraded road/trail access to the conservancy shoreline is cut off in the MPR for safety and environmental reasons and a shoreline permit would be required for all such construction to assure safety in the area. Public access to the shorelines in the resort is limited to the marina area’s “suburban” shore where the more intense use is anticipated and public facilities to safely accommodate that access are provided.

3.6.3 Stormwater

Stormwater as an environmental issue has been addressed in detail elsewhere in the report. See Shellfish/water quality section *supra* at Section 3.2.

The golf course area is designed to retain the shoreline jurisdictional area (ordinary high water plus 200 feet) in a natural condition. No project stormwater is to be discharged into Hood Canal. The existing stormwater facilities along the highway are inadequate by today’s standards and require upgrading to protect water quality in Pleasant Harbor and Hood Canal. All development within the shoreline area of the harbor is required to be captured and treated prior to discharge into the harbor. As a result, with modern stormwater management and treatment mechanisms, the net discharge to the harbor is cleaner, with less turbidity, solids and potential pollutants (road runoff) than currently exists.

3.6.4 Shellfish

As noted in the water quality section on shellfish, shellfish harvesting in the harbor is prohibited. The significant shellfish beds are in the Hood Canal locale, both north and south of the project.

To protect fish and shellfish resources, the Master Plan application has pulled all development back from the southern shoreline (including closing the current dangerous trail access) to retain the natural condition and minimal use of the southern shoreline. This closure to direct public access reduces the potential for harm to the significant shellfish beds located to the south. In addition, all stormwater on the golf course is collected, treated, and discharged on site with no direct offsite discharge of any water from impervious or golf course surfaces. In addition, a 200 foot riparian buffer of trees and native vegetation is retained along the shoreline edge to retain the natural condition to the extent possible and provide native plant treatment for stormwater falling outside the developed area. The purpose is to retain the natural filtration component of the riparian edge to retain the natural condition for stormwater runoff from the undeveloped areas.

As noted in the section on Shellfish generally (Section 3.2), the Pleasant Harbor area has been closed to shellfish harvesting due to the concentration of single-family homes and onsite disposal systems, as well as the two marinas. No shellfish harvesting in the harbor is affected by the development of the golf course area or Maritime Village. All stormwater from developed areas is collected and treated prior to discharge in accordance with adopted stormwater guidelines for the region. The Master Planned Resort will significantly upgrade current systems and project a better water quality situation than presently exists.

3.6.5 Surface Water

The surface water on the site includes three small wetlands on the golf course area and five small (non fish-bearing streams) on the marina side. As discussed in detail in the section on critical areas (Section 3.10), the central wetland is to be filled to become part of the water and irrigation management system, with onsite mitigation provided as required by County critical area requirements. The other wetlands are protected from potential impact by retaining the hydrology supporting the wetland, but capturing and treating all stormwater and irrigation water in approved systems in advance of discharge to the wetlands. Class A recycled water is available to assure adequate hydraulic flows are maintained to protect wetland functions and values.

The streams carry both stormwater from the state highway and intermittent freshets in the wet season. As with the wetlands retained on the golf course area, the streams will be left in their native condition, buffered, and all stormwater will be captured and treated for both solids (turbidity) and water quality prior to discharge. As result, the flows will be maintained and water quality improved as a result of the project.

3.6.6 Public Access

Public access to publicly-owned shorelines is a specific policy of the Shoreline Management Act. On the south side of the Master Plan area where the property is designated "natural," the shoreline area is owned by the developer, not the public, and the sensitive nature of the area and potential for damage to shellfish beds in the bay to the south support closing this shoreline to public use.

On the marina side, where DNR owns the tidelands and has leased the shorelines to the applicant for use as a marina, the recreational access opportunities are maximized. The marina is already approved and will not be increased in overall size or capacity. The owners, in cooperation with WDFW, are proposing a float replacement program to eliminate the Tunicate, which is an invasive species presently found along the wooden docks. The Maritime Village provides an expanded opportunity for the public, both boating and non-boating, to enjoy the shorelines. The impacts of public use are already present due to the marina and its related activities. The Shoreline Master Program designation of "suburban" shows the area was planned by the County as an area where an added level of public activity associated with the public use and access to the shoreline is expected. The mitigation for such areas of increased activity is to assure that water quality concerns are met during the permitting process, and that the County specifically adopts noise regulations respecting the fact that a portion of the harbor is commercial and a portion is residential. The residential noise regulations at Chapter 173-60 WAC provide an accepted level of noise versus protection, which is adequate to regulate commercial activities adjacent to residential areas and should be incorporated into any shoreline permit.

The resort may also provide some additional use of the harbor by Kenmore Air, which is another component of public access to publicly-owned shorelines. The air service may now fly into any marina area on an occasional or charter basis. As such, the use is already a permitted use (or at least not prohibited) and provides a reasonable means of accommodating the limited number of guests in a year who may wish to use the site on a charter basis, as they do now. If a proposal is made for regularly scheduled service on any basis, a new shoreline permit would be required and the impacts and limitations of such use discussed at that time. There is no proposal in the current application for increased air service to the site. See Section 3.11.1 for further information on float plane traffic.

3.6.7 Shoreline Mitigation Summary

- Public access and facilities shall be provided at the marina and Pleasant Harbor.
- Public access to the southern shoreline should be curtailed and direct access eliminated.
- All stormwater generated in the upland marina area shall be captured and treated to County standards before discharge to the aquifer.
- All surface water on constructed surfaces in the golf course area shall be captured and treated for recycling or treated in accordance with adopted County stormwater manuals, and infiltrated on site. Zero discharge to Hood Canal from the developed golf course/resort area is required.

3.6.8 Shorelines: Responses to DEIS Comments

Responding to comments by Jefferson County Public Health (284), WDFW (306).

The southern beaches are to be closed and possibly incorporated into a conservation easement for permanent protection. The development on the marina side is within the footprint of the existing development and is providing public access and priority shoreline uses in areas of existing development. Hood Canal is under pressure from increasing recreational and residential use, raising concerns for water quality. Project-specific mitigation is designed to address and mitigate projected impacts. Jefferson County land use plans, including rural regulations surrounding the resort area, septic, road, and other building and development regulations are in place to address planned development intensity. The County is currently updating its Shoreline Master Program, which is to be completed in 2009. The Pleasant Harbor area is already developed with marinas and residences. The Jefferson County septic upgrade program is one response to the issue of older septic systems, as is the requirement to readdress the adequacy of septic facilities at sale or transfer. The resort proposal is in response to the growing popularity of Hood Canal and the increased demand for facilities in the area, as well as an economic center that could create additional pressure to locate (at rural levels) in the area. Enforcement of the County GMA, health, land use, critical area and shoreline regulations all provide mechanisms to address the increasing demands for use and activity in the South Jefferson County area. Public information programs are required to inform the public of these limitations.

The cut and fill activities contemplated for the resort are well back from the water's edge and adjacent bluffs, and the fill is targeted to existing kettles. Project-specific grading plans will assess the specific needs of the project, but preliminary review of the site by geotechnical engineers indicate the site stable and suitable for the fill. The concerns for the stability of the bluff are an area of concern for the entire project and will be the subject of specific consideration during project review for all phases.

The site is adjacent to two designations, "Conservancy" and "Suburban," with a natural designation just south at the mouth of the Duckabush River. The only development near shorelines is located adjacent to the suburban shorelines.

3.7 Fish and Wildlife

The County Scoping Notice addressed Fish and Wildlife as a separate consideration and specifically requested the project site be analyzed for several items: (1) endangered species, (2) specific terrestrial animals (eagles, elk, osprey, bears, and frogs), (3) specific water-dependent animals (seals, porpoise, shrimp, geoduck, oysters, clams, stickleback, salmon, and orcas), and (4) a construction stormwater management plan.

3.7.1 Endangered Species and Listed Species

The site analysis was done for endangered species and listed species and the results were detailed in a site-specific Fish and Wildlife Habitat Assessment, July 20, 2006, contained at DEIS Appendix 7.

The endangered species potential was evaluated and determined that the project would not affect terrestrial species. The fringe riparian area along the south boundary provides significant protection for wildlife using the bay and the forested edge, as well as snags that eagles and other raptors may use for perching and feeding and these areas are to be protected in the plan.

The forested fringe left in the current application is significantly larger and provides habitat protection and use for a wide range of species. At the project level, a habitat inventory should be taken of specific significant trees to ensure that habitat protections are maintained.

3.7.2 Hood Canal-Based Species

The marine/estuarine species of Hood Canal (shrimp, clams, geoducks, oysters, Dahl's porpoise, and orcas) are not expected to be impacted from the development, due to the protection of the southern bluffs from human intrusion and the treatment of water to avoid contaminated discharge from the site. The water quality in Pleasant Harbor, as it pertains to the proposed development, will be monitored and adaptive management programs will identify additional mitigation as required.

3.7.3 Terrestrial Species

The site was evaluated for terrestrial habitat. The site is cut off from the balance of the peninsula by US HWY 101, but is still used by a variety of species, including birds, deer, and coyote. Large animals, including elk, may occasionally visit the site, but there is no evidence of regular use due to the highway. The site was examined for use by threatened or endangered species, but no nesting sites were found. The riparian edge, wetlands, and buffers do provide good habitat and will be protected. See generally Appendix 7, Fish and Wildlife Habitat Assessment.

3.7.4 Habitat Mitigation

- The riparian edge along the south shore shall be identified and protected prior to any construction
- Existing wetland buffer vegetation surrounding protected wetlands shall be marked and protected prior to any construction
- All proposals shall maintain a 50-foot buffer of riparian vegetation along streams a-f except where crossing a and b.
- The aforementioned mitigations shall be required for all such actions in the construction stormwater management plans for all phases

3.7.5 Fish and Wildlife: Responses to DEIS Comments

Responding to comments by Jefferson County Public Health (284), Skokomish Indian Tribe (365), WDFW (306), Mitchell (212), Lockett (318), Lopez (272), Russell (282).

The proposal recognizes that Hood Canal is home to six federally-listed threatened or endangered species (Puget Sound Chinook Salmon, Hood Canal Summer Chum Salmon, Puget Sound Steelhead, Bull Trout (Coastal Puget Sound), Southern Orca Whales, and Stellar Sea Lions). Further, both the Duckabush and Dosewallips Rivers are considered important systems in the maintenance and rehabilitation of affected runs. The property planned for the resort drains to Pleasant Harbor on the north and at the mouth of the Duckabush River to the south. Mitigating measures identified in this FEIS will be implemented to protect the southerly beach adjacent to important tidelands and the mouth of the Duckabush River, which is important not only for shellfish, but for all stages of salmon and fish life cycles.

The Dosewallips River is located northerly of the site and out of any direct runoff or physical impact. The impacts there are secondary, with increased public use of facilities in Brinnon and the public

beaches. The MPR is required to coordinate with state agencies on educational programs and techniques to assure proper use of public lands.

The resort is located in an area of existing development, minimizing intrusion of such a facility on the undeveloped and more significant habitat to the east, and away from the shoreline, minimizing direct impact to the southern beaches.

The applicant is proposing to save substantial natural and open space on the site and to achieve the riparian buffers noted. The construction of a Master Planned Resort will inhibit use of the site by larger mammals, but as noted particularly the elk are not noted in the Black Point area, but farther north in the river plains. Any Master Planned Resort of a size and scale to support sewer and no offsite discharge would require significant site development and is an unavoidable consequence of the development of the site. Project-level review is directed to protection of riparian habitat on the south boundary, the vegetation buffer along US HWY 101, appropriate vegetation and tree buffers along the Pleasant Harbor shoreline, and the maintenance of functions and values of the wetland and stream critical areas in the appropriate sub basins.

An adaptive management program to address water quality and upland issues is planned to be part of the marina water quality program at the project level to address issues as they may arise in the future.

The Duckabush River delta is considered an important shrimp nursery area, and important habitat and nursery for juvenile stages of Dungeness crab. The sensitivity of the area for shellfish and sea life of all kinds reinforces the importance of maintaining a riparian buffer along the southern shoreline, assuring retention and treatment of all water affected by construction or development to assure water quality of all waters and seeps on the peninsula affecting or affected by the development. The sensitivity of the area was also the rationale for closing any efforts to access or use the southern beaches.

Reference is made to an Osprey nest in the Pleasant Harbor area. Plans to protect the nest, as appropriate, will be addressed at the project level if the nest is still active or capable of providing support to local populations.

No evidence of eagle nesting or roosting was identified onsite. The retention of a significant riparian area on the south shore will retain existing snags for perching.

3.8 Rural Character and Population (including housing density, mixed retail and rental affordability)

3.8.1 Characterization

Rural character on Hood Canal includes a mixture of open spaces and more densely packed residential and tourist areas, including both public and private facilities. The Maritime Village and golf resort area occupy areas that have historically been tourist oriented with a great deal of tourist activity, particularly during the summer. The resident population is estimated to be between 200 and 300 people, given a mix of staff (including summer staff) and limited permanent population, a summer residency of between 1200 and 1500 people at peak summer occupancy, and about one-fifth that number during shoulder and slow periods.

A number of very popular campgrounds, including Dosewallips State Park located a few miles north, contribute to local summer activity as it has nearly 400,000 visitors per year.

The overall density of the resort is approximately 3.5 units per acre, similar to the historic density of Black Point, but with much greater open space. The provision of RV housing for construction workers and staff rental housing is designed to reduce pressure on the limited housing availability in the Brinnon subarea.

The resort is expected to create an increased interest in the Brinnon area of the canal for residential development. But outside the resort area, such demand is at rural levels of density and services as defined in the Brinnon Subarea Plan. The resort is prohibited from providing urban sewer and water

services to the rural areas, except for areas of identified health problems. (For example, the development of the Master Planned Resort sewer system would provide Black Point residents with failing septic systems an alternative where the failing system is at risk of contaminating Hood Canal, but such limited use of the sewer system is only for solving existing problems and not in enabling new development.) The County is developing a shellfish protection district to address water quality and the sale of existing homes will trigger review and probably upgrade of older septic systems.

The resort is proposed to have limited onsite retail capability (as distinguished from the BSAP model which has a significant retail component in a resort village west of US HWY 101). This decision was intentional to achieve the objective of the BSAP for the resort to provide an economic boost for Brinnon businesses, as well as simply providing a fully self-contained resort. The resort is expected to bring additional small commercial and service businesses to Brinnon, consistent with the Brinnon Subarea Plan, and subject to project-specific, site-specific environmental reviews and mitigation.

3.8.2 Rural Character and Population: Responses to DEIS Comments

Responding to comments from Hood Canal Environmental Council (275 and 385), Jefferson County Public Health (284), Murdoch (139), Von Christierson (148), Dimino (193), Mitchell (212), Peterson (260), Russell (245 and 304), Russell (282), Mitchell (297).

Rural character concerns principally address the impact of a large facility on a rural community, including changing the character of the area, impacts to a rural way of life, and the economic consequences of increased valuation on existing populations.

Preference is expressed for a much smaller facility, which could fit under the "no action" alternative. But such facility would not be the urban "Master Planned Resort" that the County envisioned through the Brinnon Subarea in the Brinnon Subarea Plan. The Plan sets out a concept and detailed description of why a Master Planned Resort is appropriate at Black Point.

Vision:

For over a century, Brinnon served as an outdoor recreation based retirement and tourist community. This plan serves as a road map ... to make the changes necessary for Brinnon's future success.

BSAP at p. 1.

Master Planned Resorts: See BSAP at pp. 45, 46, including:

Resort—could be comprised of the former NACO Campground and RV Park property, an 18-hole golf course, with clubhouse facilities and hotel/inn with conference and health/athletic facilities; with on-site advanced stormwater and wastewater treatment systems integrated into the golf course.

BSAP at p. 45.

The Statesman proposal provides the golf course and athletic amenities in a hotel resort with 890 rooms in cabin, villa, and townhouse settings, for tourist and conference use. Statesman did not add the 25 residential units along the south water's edge as suggested by the conceptual master plan, preferring instead to have that area dedicated to open space and riparian buffer. Likewise, the Statesman proposal limits the commercial retail development suggested for the 7 acres on the east of US HWY 101 and did not incorporate the properties west of US HWY 101 into the Master Planned Resort, respecting the potential for significant traffic issues at that location if substantial additional traffic were added to the proposed resort site.

The hotel resort facilities need to be of sufficient size to support the sewer water treatment and stormwater capture and treatment requirements imposed to protect the environment of the area and achieve the advanced onsite stormwater and wastewater treatment systems incorporated into the proposal in response to the policy guidelines. The Statesman proposal was reduced to 890 units through the preliminary review process. At this level, the project can fund both the construction and the operation of the major facilities required. Reduction in size would prevent the facility from achieving the economies necessary to construct and operate such facilities.

The suggestion that the County should revert to the "no action" alternative is contrary to the goal to "promote recreational and tourist development consistent with the character of Brinnon," BSAP Goal G1.0, p. 48, and the policy of achieving that goal:

- P1.1 Encourage the proposal of a Master Planned Resort for Black Point to foster economic development in Brinnon consistent with the vision illustrated in this Subarea Plan.

BSAP at p. 48.

The applicant is required to develop a "buy local" program to give local vendors the opportunity to participate at both the construction and operation supply level. Details of such a program will be worked out with the EDC and WSU extension program to facilitate local participation at the time of specific Master Plan approval.

The Subarea Plan envisioned the resort as an economic boost to the Brinnon Subarea and identified Brinnon as a Rural Village, providing services and facilities to the area. Brinnon does have challenges with respect to the flood hazard areas and lack of services. The County regulations need to assure that new development is in areas safe and able to accommodate new growth. The Brinnon rural village would provide a range of services and facilities that complement the MPR.

Increasing boat pressure, increasing population pressures, and increasing tourist pressures are all projected for the area, and cumulative impacts will occur. The purpose of the detailed project-level planning and permitting process is to identify how the resort may facilitate the pressure and mitigate impacts properly attributable to the resort's development. The potential for cumulative impacts is acknowledged, but is also a product of the increasing demand for facilities and services, independent of the resort, and the competing goals of improving economic development and increasing public access to public lands on the one hand and the need to make sure environmental protection is assured on the other. The project permitting phase is identified as the best way to achieve these goals in context of specific proposals and mitigations.

The rural character of Brinnon is based upon historical build out patterns in an area of large river watersheds and attractive Hood Canal waterfront. Future characteristics are determined by the County Comprehensive Plan and implementing regulations. The Plan did acknowledge the potential for a Master Planned Resort in the area and has the tools to continue to regulate development in an environmentally appropriate manner within its current regulatory framework. The present land use designations anticipate growth in the area at 1-5, 1-10, and 1-20 units per acre and other allowed rural uses. That development is anticipated to occur with or without the resort, but may occur more rapidly as a result of the resort. The other alternative, however, is that pressure on the larger tracts may be reduced, as those who desire to use the area would have resort and short-term rental housing available, reducing the need to purchase and develop property to enjoy the area on a regular basis.

The project does propose an onsite temporary housing program to address the issue of worker housing and limited rental resources in Brinnon. At project-level approvals, the specifics of the number and timing of workers and worker housing and other demands will be addressed.

Cumulative and community impacts are difficult to assess, but it is fair to say that the inclusion of a resort at Brinnon will have a direct and marked effect on the overall character of the community. Beginning in 1998 the Jefferson County Comprehensive Plan specified efforts to create an economic

change in the South County. The Brinnon Subarea process was commenced and the community vision expressed in that document was for a Master Planned Resort.

The plan contemplated a series of changes that were viewed as being in the public interest, and the Statesman Master Planned Resort is only a first step in what could be a larger implementation of that vision.

Other property owners in the MPR area shown in the Brinnon Subarea Plan, may elect to join the Master Planned Resort, by amendment, and could upgrade their current rural facilities to urban facilities in conjunction with upgrades to the Master Planned Resort sewer, water, and other facilities. (These facilities may not serve rural uses outside the resort, as the urban services are to be "fully contained.")

Alternatively, property owners in the area, under current rural rules may seek to develop compatible rural-scale facilities under rural tourist and small business regulations, without becoming part of the Master Planned Resort. Both types of activity may bring the additional economic and employment resources to Brinnon envisioned by the Subarea Plan. How such development plays out is speculative at this juncture, until the other property owners make specific plans for their individual properties. Any new plan or project is subject to environmental review under regulations in place, including SEPA environmental review.

Concerns about sustainability and the relationship with Brinnon also pose a range of issues that may be foreseen generally, but the specific execution of plans and projects await individual property owner's responses. The Brinnon Plan envisioned an increase in economic and housing activity in the Brinnon Subarea, principally within the guidelines of rural village and rural development outside of other property owners choosing to join the Master Planned Resort, now or in the future.

The FEIS does address job and temporary housing, recognizing it as an issue, and providing mechanisms for specific review and approval at the project level.

The project does not guarantee that employees must live onsite, and in fact the integration of resort staff and local residents into a single community, and not the "we-they" of competing factions, is an objective of both the proposal and the Brinnon Subarea Plan. One objective of the resort is to create the critical mass to bring additional facilities and services to the community, located consistent with standards for appropriate development in the area.

Questions about enforceability of covenants and conditions are addressed at the project level. The FEIS, the development regulations established if the Comprehensive Plan amendment is approved, and finally the specific mitigation and conditions of approval at the project level all provide a matrix and framework for the community to realize the controls necessary to achieve the goals set forth for the project.

There is a high level of community sentiment both for and against the resort. The community vision is captured in the Brinnon Subarea Plan, which looks to a non discharge resort that can provide recreation and resort opportunities, as well as economic development. The scale is at a level within allowed traffic levels of service, and is limited by need for adequate water and sewer facilities as approved by state and local agencies. The location is an area with Canal tracts to the south, the rural village of Brinnon to the north, and significant pre-GMA development in the Black Point/Pleasant Harbor area. At an average density of less than four units per acre, and retention of many trees and buffers to substantially shield much of the resort from public view, the scale of the proposal fits the general area while providing the desired amenities meeting the Comprehensive Plan's objectives.

The Master Planned Resort needs to be an economic entity large enough to support the many amenities and protections demanded by the community for approval. Character and scale are protected by preserving open space and buffers, and keeping overall density at below four units per acre (the low end of urban range and within line of the existing development along Hood Canal in the area).

3.9 Archeological and Cultural Resources

3.9.1 Characterization

Archeological and cultural resource interests resulted in coordinated meetings with local tribal interests. The site was examined and the details are set forth in the Cultural Resource Assessment, at Appendix 8. The result of the search identified no specific sites in either the marina or golf course area. The southern shoreline abutting Hood Canal is a significant environmental and cultural area due to the need to protect adjacent fishing and shellfish grounds. As noted previously, the master plan proposes to close this beach to resort use.

3.9.2 Archeological and Cultural Resources: Responses to DEIS Comments

Responding to comments of the Skokomish Indian Tribe (365, 372, and 374), Germaine (129).

Project-level work, and specifically land clearing and grading plans will be required to have a cultural resources monitoring program in place to coordinate review for potential artifacts or sites of cultural significance and a program of appropriate response should such sites be identified. The discussions with the tribes reflected in the cultural resources section of Tribal comments continue to reflect the project proponent's planned approach.

3.10 Critical Areas

The Scoping Notice asked the applicant to examine the five listed critical areas under the County critical area ordinance, which include (1) wetlands, (2) aquifer recharge areas, (3) fish and wildlife conservation areas, (4) frequently flooded areas, and (5) geologically hazardous areas.

Critical areas are governed by the County's critical area requirements. The purpose of the master plan review and the required development agreement is to assure that critical area regulations are followed in the development of the master plan, and that the master plan is approved with a single set of guidelines to assure that the overall plan is carried out under a single set of rules. Development agreements are commonly used to provide a degree of continuity for long-term projects. The Legislature has given authority for such agreements (RCW 36.70B.170) and the County details are at JCC 18.15.126(2) and 18.40.850-.890. The key requirements are that the plans be consistent with regulations, in place at the time of approval, and that the agreement specify the duration for the implementation of such rules.

3.10.1 Wetlands

A detailed wetland assessment was made and the results are contained in the Wetland Delineation at Appendix 9. The site has three wetlands on the golf course side and none on the marina side. The confirmed wetlands in the golf course area are identified as Wetlands "B," "C," and "D." The wetlands are Category II and no specific threatened or endangered species were found during the wetland delineation process. The site critical areas/wetlands are shown on Figure 3-19.

The wetlands to be protected have well established native buffers that need to be protected at all times. The wetland to be removed does have some vegetation, but is also affected by vestiges of logging, roads, and infrastructure and as such is disturbed, marginal habitat in places, and susceptible to modification and restoration to improve both function and value.

Wetland "B," which is approximately 0.475 acres (see wetland report, Appendix 9), is proposed to be converted from a wetland to a control pond for treated process water from the wastewater treatment system and irrigation return flow to provide a source of water reuse and golf course irrigation to reduce the overall water consumption of the site. Wetlands "C" and "D" will remain unaltered.

The criteria for wetland protection and mitigation are set forth in the County Code for critical areas which governs replacement ratios and buffer management.

The Scoping Notice requested the applicant address wetlands as an element of review. The wetlands have been reviewed and delineated (Appendix 9) and by issuance of a March 27, 2007 letter, the USCOE has made a determination that the wetlands are not jurisdictional for purposes of USCOE permit review.

Wetlands are regulated as a critical area under the state’s Growth Management Act, RCW 36.70A.060, and local regulations are to assure that functions and values of the wetland system are maintained. Court and Growth Board cases make it clear that wetlands may be altered or moved to accommodate a specific project, so long as the actions are reasonably necessary and the overall subbasin functions and values are retained.



Figure 3-19 Protected Areas Map

As described in Appendix 9, site investigations have confirmed three Category II wetlands: “B,” C,” and “D” as depicted on the map in App. D to the Wetland Report and further described therein on pp. 9-11. Wetlands “C” and “D” are to be retained, and “B”, which has only seasonal ponding in a large glacial

depression known as a kettle, will be filled to provide adequate storage on site for the wastewater treatment system, and the functions and values replaced, on site, in a fashion to ensure the functions and values are retained as provided by the County Code. The onsite wetlands were delineated using the updated (2004) wetland rating manual as required by JCC 18.15.325(1)(2). Standard wetland buffer widths are currently 100 feet from a Class II wetland and 50 feet from a Class III wetland (JCC 18.50.340(5)).

Since the Master Plan is proposing to use Wetland "B" as a part of the water treatment recycling center program, the wetland at the bottom of this kettle will be filled, and an appropriate mitigation plan will be developed in accordance with Jefferson County Code. The general standard for mitigation is found in the Code which states:

The overall goal of mitigation shall be no net loss of wetland function, value and acreage.

JCC 18.15.350.

The projected impacts to wetlands could occur both during construction and during operation of the resort. During construction the hydraulic and structural integrity of wetlands and buffers to be saved must be marked and protected. Water quality entering wetlands and buffers must be protected to avoid turbidity. Water quantity entering wetlands and buffers must be assured to avoid a change in function and value for wetlands being preserved.

The wastewater treatment and water use and recycling detailed in Section 3.3 above demonstrates the preferred approach to water management on the site. With water conservation and recycling as a major component of the proposed mater plan, the use of the kettle area as a storage basin for water the water recycling process is unavoidable to retain necessary water onsite.

Wetland "B" is the only area on the site capable of holding the water and providing necessary storage for the system to function. As such, the project would be reviewed per the compensatory mitigation requirements of JCC 18.15.350(2):

Table 3-11

Required Replacement Ratios for Compensatory Wetland Mitigation		
Wetland Category	Creation and Restoration⁽¹⁾	Enhancement⁽²⁾
I	6:1	12:1
II or III		
• Forested	3:1	6:1
• Scrub-Shrub	2:1	4:1
• Emergent	2:1	4:1
IV	1.25:1	2.5:1

Notes:

(1) The first number in the ratio specifies the acreage of wetlands to be created, and the second number specifies the acreage of the wetlands proposed to be altered or lots. The replacement ratios are derived from Department of Ecology Publication No. 97-112 (1998): "How Ecology Regulates Wetlands"

(2) Enhancement of existing wetlands may be considered as compensation, but above ratios must then be doubled.

JCC 18.15.350(2), Table 3-5 (current version).

In considering wetland mitigation, preserving the existing functions and structure of wetlands "C" and "D" will be important. Alternate sites for wetland mitigation need to be identified and demonstrated. If

enhancement of these wetlands is the selected mitigation procedure, doubling of the replacement ratios is required or the creation of new wetlands and buffers on site consistent with the County code requirements and the more general charge that there be no net loss of critical area function and value when replacing habitat lost by development.

Another mitigation alternative exists to offset the loss of the isolated Wetland "B." Wetlands may be created as water features and incorporated into the golf course design with ecological considerations. The Trophy Lake Golf Course in Kitsap County is a good example to illustrate how this can be accomplished. By using a sand cap over the entire golf course, water is collected in the grass root system and directed toward the rough areas where a sand berm filters the water prior to allowing the runoff to flow downslope into created wetland areas (see attached figures from AES, 1999⁴). Monitoring of the Trophy Lake Course has proved that fertilizer loading was stopped after the second year of grow-in and with proper golf course maintenance and operation, pollutant loading can be avoided which saves money and time for the golf course (AES 2001⁵). Wildlife features can also be added to the golf course as described by Audubon International. More information on this organization can be found at: (<http://www.auduboninternational.org/programs/signature/signaturelevels.htm>).

Jefferson County has adopted the King County model for golf course maintenance and the resort will be required to demonstrate compliance with the King County model or substantial equivalent in the management and operation of the golf course facility.

A wetland mitigation plan will be developed in conjunction with the detailed design phase of the project and will be required at the outset of the grading plan in advance of final plat approval and project development when details of the construction will be available. It is common that mitigation plans be implemented prior to the planned filling activity, such as that of Wetland "B".

The site has only two areas suitable for enhancement to provide the necessary mitigation and these are both upland sites adjacent to wetlands. The uplands are disturbed as both were in the area of the RV camp that existed for many years. Natural topographic conditions may be enhanced to promote hydrology to support. In addition, site runoff can be collected, treated, and then released into created wetlands to further maintain hydrology and wetland characteristics and also to support onsite infiltration. JCC 18.15.350(3)(f).

An alternative approach may be a cooperative compensation project for a significant wetland project in the area, but no such program presently exists, and would require participation by state agencies and the County. Absent a specific proposal from a governmental agency, the onsite solution appears to be the most feasible. Approval of site specific wetland mitigation plans will be required as part of the preliminary plat approval.

3.10.2 Aquifer Recharge Areas

The County critical area regulations impose specific limits on projects that are designated (mapped) as critical area aquifer recharge areas. The Black Point property is mapped as an aquifer protection district, and the Master Planned Resort best management practices are taken from aquifer protection guidelines in the County to assure any potential impact to the aquifer is eliminated or minimized.

The Black Point residential area is served by ground water, and prohibited uses in significant aquifer recharge areas are detailed as JCC 18.15.240-.255. None of the prohibited uses are to be included in the development of the golf course area, and the Master Plan approval requires the project to meet best management practices for use, treatment, and discharge of all waters used on the golf course.

⁴ Applied Environmental Services, Inc. 1999. Trophy Lake Golf Course & Casting Club Storm Water Quality Design Report. Prepared for OB Sports and Kitsap County Public Works Department. September 13, 1999.

⁵ Applied Environmental Services, Inc. 2001. Trophy Lake Golf Course & Casting Club 2001 Water Quality Monitoring Report. December 17, 2001. Prepared for Trophy Lake Golf & Casting Club and Kitsap County Public Works Department.

The fueling facilities at the marina are in areas that are not part of a well dependent water supply and no impact to potable water aquifer is anticipated.

County rules do have special provisions for golf courses, which will be followed, and the Class A recycling regulations also have rules concerning existing potable water sites that will be incorporated into the reuse/recycling treatment and discharge plan for the site to be approved by WDOE as part of the water rights/wastewater discharge permit approval process.

3.10.2.1 Aquifer Protection Mitigation

The stormwater management plan for the golf course shall demonstrate compliance with the County requirement for golf courses and stormwater management on aquifer protection districts. An approved preconstruction aquifer protection plan shall demonstrate retention of sheet flow water and ground wilts onsite.

3.10.3 Fish and Wildlife Conservation Areas

The County critical area regulations, at JCC 18.15.283-.320, provide for setback from streams, including nonsalmon bearing streams. Several intermittent or seasonal stream channels have been identified on site (Type 5 under the County classification system). The streams are steep in gradient and blocked from fish passage due to structural barriers (see Fish and Wildlife Habitat Assessment at Appendix 7, p. 3). The project is to be developed with full buffers retained for all Type 5 streams. Stream crossings (a and b) will require mitigation to meet County standards. The creation of a complete and modern treatment system for stormwater on the developed portion of the marina site will reduce the discharge of turbidity or potential untreated or contaminated stormwater to the stream system and the net effect should be an improvement in water quality discharge. A 50-foot native vegetation buffer is required for all streams.

The riparian edge along the southern shore is nearly 100 feet above the shoreline and does provide a heavily forested, natural edge for the shore, which is the preferred treatment for sensitive or relatively undisturbed shoreline edges.

3.10.4 Frequently Flooded Area

The site has no flood plains or frequently flooded areas and these provisions do not apply.

3.10.5. Geologically Hazardous Areas

The site has been reviewed with a thorough geologic hazard analysis. See DEIS Appendix 4.

The principal geologic hazard feature on the site is the steep bluffs along the southern shore. The County ordinance requires setbacks for any structures or development from tall bluffs of at least 100 feet. The project is retaining a 200-foot vegetated edge along the steep slopes and eliminating potential road and trail traffic down or along the bluffs. The plan fully complies with all requirements and provides an extra margin of safety. The stormwater management plan shall require that all water from developed areas be captured in areas sufficiently removed from the bluff edge and are sized sufficiently to avoid discharge to or destabilization of the bluff in the event of wet seasons or upset.

3.10.6 Critical Area Mitigation Measures

- Wetlands shall be protected from development (except Wetland B used for reuse and recycling) and a wetland buffer and mitigation plan shall be developed which demonstrates, under best available science principles, that the wetland functions and values of the resort area have been maintained through a combination of retained, enhanced, and constructed wetlands and buffers. The plan shall demonstrate no net loss to overall wetland area function and value.
- An approved preconstruction wetland mitigation plan must demonstrate how loss of wetland habitat is offset, protection measures for water quality and quantity maintenance, and buffer

protection. Such protections must be in place prior to commencement of any grading onsite. The wetland mitigation report for Wetland B shall be approved and demonstrate how the overall system will operate, both during construction and operation to assure overall no net loss of function and value for the resort area wetland system.

- The stormwater management plan for construction shall require all wetland areas (existing and new) meet the no net loss test and are in place prior to the removal of the Wetland B wetland.
- The three northerly streams shall be set aside in a natural area, and development shall be limited to that necessary to provide adequate access and road right of way. All culverts carrying streams shall be fish passable where the stream has the potential to be fish bearing.
- The two southerly streams shall be protected during construction and road crossings shall comply with adopted standards.
- The resort shall be required to annually collect water quality monitoring data from the state water quality sampling station at Pleasant Harbor and submit a summary water quality report to the County. In the event that water quality shows any sign of deterioration, the County shall consult with the resort, the local residents, and the State (both WDOH and WDFW) concerning the source of the change. The resort permits shall require the resort to implement any mitigation measures determined necessary by the County to alleviate any water quality issues emanating from the resort properties.

3.10.7 Critical Areas: Responses to DEIS Comments

Responding to comments of the Hood Canal Environmental Council (275 and 385), WDOE (381), Jefferson County Public Health (284), WDOE (281 and 375), Hal Beattie (133).

Wetland B will be affected by construction of the large retention kettle. Wetlands C and D are not expected to be impacted by the proposed project. Wetland mitigation will be conducted to comply with state and local permitting requirements and will be based on no net loss of function and value. The FEIS requires a wetland mitigation plan to be in place and approved at the project level prior to construction on the site. Details as to the size, location, and nature of mitigation wetlands and buffers are required and will be addressed at the project-level review, under requirements of Jefferson County Code.

The DEIS failed to mention the WDOE responsibilities in wetland modification. WDOE also has a permitting role in supervising and approving changes to waters of the state, including wetlands, and through their cooperative permitting process with Jefferson County, they will also be involved in the evaluation and approval of the wetland modification and conditions.

An old heron rookery site was identified on State lands south and east of Pleasant Harbor. Project-specific plans will include identification of the site and mitigation if necessary consistent with the habitat management guidelines from Washington State Department of Fish and Wildlife. The entire area of the proposal will be evaluated at the project level to identify specific needs to protect fish and wildlife.

The project may use special permits to adjust buffer widths consistent with County requirements to fit the state and local conditions.

Floodplains. The project site does not have floodplains, but incidental development either in Brinnon or in the watersheds of the Duckabush or Dosewallips Rivers could affect or be affected by floodplains. Project-level review looks at both direct and indirect impacts and will be looking at related flood hazard issues.

The Public Health Department pointed out that US HWY 101 does cross flood hazard areas, steep slopes, and other critical areas. Project-specific development review includes critical areas and direct and indirect impacts attributable to the project and proper mitigation where necessary and appropriate.

3.11 Other Issues

During public discussions several issues were raised which do not fall neatly into the format of the scoping notice but which should be addressed.

3.11.1 Existing and Proposed Float Plane Traffic in Pleasant Harbor

It is possible that float plane traffic in Pleasant Harbor may increase as a result of the proposed development from people coming to visit the resort and attractions in the Hood Canal area, through various marketing endeavors and population growth in the general Hood Canal region. Currently, the average annual number of float plane flights into Pleasant Harbor by Kenmore Air is 5. In comparison to other resorts in the area, Alderbrook experiences approximately 30 flights per year and Port Ludlow at 20 flights per year, all serviced by Kenmore Air on a Chartered Service Package.

The demand for float plane travel to destination resorts is limited and represents a very small niche market. Both Alderbrook and Port Ludlow serve a wider permanent population than Pleasant Harbor. While some resort-oriented travel may occur, it is expected to be incidental and not significantly greater than the present levels of service.

3.11.2 Military Operating Areas

This is to acknowledge existing and proposed military operating areas near the proposed development. Notification and adherence to notices is imperative and will be strictly enforced by the US Navy.

The Navy needs to extend the Northwest Range Complex operating area to provide multiple in-water environments that meet the evolving operational requirements for manned and unmanned vehicle testing in Washington State. The Northwest Range Complex is comprised of three marine ranging areas in the Pacific Northwest (Washington state): (1) The Dabob Bay Military Operating Area (MOA), two Hood Canal MOAs and the connecting waters known as the Dabob Bay Range Complex (DBRC); (2) the Keyport MOA; and (3) the Quinault Underwater Tracking Range (QUTR) MOA which is located within the Navy MOA W237A.

The range extension is required in order to provide adequate testing area and volume in multiple marine environments to fulfill the NUWCDIVKPT mission of providing test and evaluation services in both surrogate and simulated war-fighting environments for emergent manned and unmanned vehicle program operations.

The DBRC is the Navy's premier site for proofing, research, and development of underwater systems such as torpedoes, countermeasures, targets, and ship systems. No testing of explosive warheads occurs, or is planned to occur, in the DBRC; explosive warheads are never placed on test units. Primary operations at the DBRC provide production acceptance (proofing) tests of underwater systems, research and development test support, and fleet tactical evaluations involving aircraft, submarines, and surface ships. These tests and evaluations of underwater systems from the first prototype and pre-production stages up through fleet operations (inception to deployment) ensure reliability and availability of underwater systems and their components to the fleet. The site also supports acoustic/magnetic measurement programs. These programs include underwater vehicle/ship noise/magnetic signature recording, radiated sound investigations, and sonar evaluations. In the course of these operations, various combinations of aircraft, submarines, and surface ships are used as launch platforms. Appendix 10 includes a figure outlining the Proposed DBRC Site Extensions and Typical Notice to Mariners.

In order to provide compliance and mitigate for the military operations and activities that will occur near the proposed development, notices will be posted at the Maritime Village and marina. In addition, information regarding the military operating areas and examples of notices will be provided to purchasers and users at the resort.

3.11.3 Other Issues: Responses to DEIS Comments

Responding to comments by Stephens (127), Ross (132), Mitchell (212), Peterson (260), Hood Canal Environmental Council (275 and 385), John McDuff (97); Ian McFall (131), WDOE (281, 275, 276, 381).

Project control and assuring the objectives of the plan are met in fact. The FEIS identifies a series of mitigation requirements that will be implemented through a combination of specific zoning regulations and a development agreement on phasing and project controls (to be developed if the Comprehensive Plan amendment is adopted) and then project-level review with supplemental environmental review based on specific engineering and technical issues and standards.

Permit conditions and requirements run with the land and are conditions on any operator, should Statesman elect to transfer all or a portion of the facility to other owners.

Questions are raised about the carbon footprint. The resort is a response to increasing demand for facilities to enjoy the natural amenities available in the area. Thus, on the one hand, it brings a significant number of people to the area who may not otherwise come. But it also provides a local area for those who want to enjoy the area and would otherwise have to drive in on a daily basis, or use public facilities and campgrounds without the sewer and water facilities present at the resort. The resort is committed to a green approach to development and operation, consistent with the area and feasible approaches for a sustainable resort. The issues are of concern and will be addressed in both the design and operation of the resort. Reducing impervious surfaces, providing shuttle and integrated public transit, and low energy utilization facilities all contribute to reducing the carbon footprint.

The objective of the EIS was to identify potential adverse environmental impacts of the proposed amendment and identify whether the project meets the goals of the Comprehensive Plan and can adequately address the avoidance, minimization, or mitigation of identified environmental consequences. Through the DEIS and comments, the potential issues have been raised and means to address adequate mitigation at the project level are in place.

One frequently addressed concern is that the resort provides only "low paying jobs" and as such would not be of any economic benefit to the community. The economic benefits are detailed in the EIS, and include:

- Property Tax receipts from more than \$300,000,000 in physical improvements to the Black Point property.
- Sales tax receipts, B & O tax receipts, and hotel/motel tax receipts from the resort operations and from increased sales in the area.
- Mitigation and impact fees paid by the applicant to address public service and public facility needs.
- The creation of more than 100 jobs during construction and 200 jobs during operation.
- Construction typically provides "family wage" jobs, and the resort has senior management and responsible positions in conference center, food service, facilities, marina management, and golf management that also fit the "family wage" jobs designation, as well as the seasonal and part-time jobs that provide employment opportunities for youth and for those who prefer the flexibility allowed. The assertion that "only low paying jobs" are present is simply not true.
- The project is required to have a job and contract posting program that will provide opportunities for local vendors to compete for project jobs and contracts.
- The memorandums of understanding with local agencies will provide some assurance that funds to mitigate concerns in the South County will be spent in the South County.

The site is undergoing voluntary clean up by the present owners, which should be completed shortly after the end of the year and is a prerequisite to Statesman taking title. Contact information is accurate.

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