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# City of Walla Walla Comprehensive Plan Update Final Environmental Impact Statement

May 2018



# Walla Walla Comprehensive Plan Update Final Environmental Impact Statement

**May 2018**

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# Fact Sheet

## *Project Title*

Walla Walla Comprehensive Plan Update & Final Environmental Impact Statement (FEIS)

## *Proposed Action and Alternatives*

The City of Walla Walla is updating its Comprehensive Plan in compliance with the Growth Management Act (GMA). The update includes the following:

- Revisions to the Walla Walla Comprehensive Plan Elements to address growth during the 2018-2038 planning period; land use plan and zoning changes to accommodate growth targets for population, housing, and employment; transportation and capital facilities plans, and housekeeping amendments.
- Amendments and updates to comprehensive plan elements to ensure consistency with the City's review of its plans in response to GMA requirements and Countywide Planning Policies.
- Consideration of changes to the Urban Growth Area (UGA) to accommodate new growth in an area that is easier to serve with urban infrastructure and remove an area that is difficult to serve and can only support low-density development.
- Updates to zoning and development regulations for consistency with the updated future land use plan.

To consider alternative means to accomplish the purpose and objectives of the update, the following alternatives were studied in the Draft Environmental Impact Statement (DEIS) issued in March 2018.

- **Alternative 1 No Action:** This is a required alternative under the State Environmental Policy Act (SEPA). This alternative accommodates medium growth through 2038 within the current City limits and UGA boundaries. Minimal policy changes would be made to update the plan to meet new GMA requirements, otherwise no other changes would be made to update the Comprehensive Plan.
- **Alternative 2 Medium Growth with UGA Alterations:** This alternative accommodates medium growth through 2038 within the current City limits and a modified UGA boundary. Approximately 198 acres of the southern UGA near "3rd and Langdon" would be removed because they are encumbered with critical areas and difficult to serve with urban infrastructure and services. Approximately 329 acres in the "North Area" would be added to the UGA for new mixed-use development. Other land use changes include adoption of a new residential land use designation that would allow for a greater variety of housing forms and increased density, any privately initiated amendments, and amendments to correct consistency and compatibility issues. In addition to meeting new GMA requirements, there would be a number of policy changes to the plan. These policy changes would address: community character, health, energy efficiency, enhancement of the Mill Creek corridor, improvement of parks and gathering spaces, climate change, housing affordability, neighborhood commercial uses, and transportation improvements.
- **Alternative 3 High Growth:** Alternative 3 looks at how higher growth could be accommodated within the existing City limits and UGA boundaries. Land use changes would be limited to the adoption of a

new residential land use designation that would allow a greater variety of housing forms and increase density, any privately initiated amendments, and amendments to correct consistency and compatibility issues. Policy changes would include the changes in Alternative 2 plus additional policy support for multi-family zoning and infill development.

The following Preferred Alternative was developed in response to Walla Walla County's proposal for its Comprehensive Plan update:

- Preferred Alternative - Medium Growth with UGA Alterations and Identification of Long-term Planning Area. This preferred alternative is very similar to Alternative 2. It accommodates medium growth through 2038 within the current City limits and a modified UGA boundary. Approximately 198 acres of the southern UGA near "3rd and Langdon" will be removed because they are encumbered with critical areas and difficult to serve with urban infrastructure and services. However, the approximately 329 acres in the "North Area" will not be added to the UGA. Instead it will be identified as a Long-term Planning Area for new mixed-use development for potential future growth beyond the 20-year planning horizon. Other land use and policy changes identified in Alternative 2 are included in the Preferred Alternative.

### *Location*

The primary study area includes the City of Walla Walla and its designated Urban Growth Area (UGA), which is currently approximately 13,238 acres. The proposed area of UGA change in the Preferred Alternative includes the withdrawal of approximately 198 acres near 3rd and Langdon in the south part of the UGA. This area is characterized by more intensive rural development including 1 unit/acre development on septic and wells. The location, development pattern, and presence of critical areas make it cost prohibitive to provide urban services and facilities in this location.

See Exhibit 1.2 1. for a map of the City of Walla Walla, its UGA, and the proposed UGA change.

### *Proponent*

City of Walla Walla.

### *Tentative Date of Implementation*

June 2018.

### *Lead Agency*

City of Walla Walla.

### *Responsible SEPA Official*

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### *Required Approvals*

The Walla Walla City Planning Commission has the authority to make recommendations on changes to the Comprehensive Plan. The Walla Walla City Council has the authority to approve amendments to the Comprehensive Plan.

In addition, the change of the UGA boundary requires an update to the Walla Walla County Comprehensive Plan. The Walla Walla County Planning Commission has the authority to make recommendations on the Walla Walla County Comprehensive Plan amendments to the Walla Walla County Commissioners. The Walla Walla Board of County Commissioners has the authority to approve amendments to the Walla Walla County Comprehensive Plan.

The Washington State Department of Commerce reviews proposed Comprehensive Plan and development regulation amendments during a 60-day review period prior to adoption.

The Walla Walla Valley Metropolitan Planning Organization certifies Transportation Elements.

### *Principal EIS Authors and Principal Contributors*

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(GIS and Mapping, Land Capacity Analysis, and Citizen/Property Owner Amendment Requests)

#### *Date of Final Environmental Impact Statement Issuance*

May 22, 2018

#### *Prior and Future Environmental Review*

The City has issued the following SEPA documents related to its Comprehensive Plan and relevant to the current study area:

- *Environmental Impact Statement – 2008 Comprehensive Plan Update, May 2008.*
- *Addendum to 2008 Environmental Impact Statement – January 2010.*
- *Determination of Non-significance – 2014 Comprehensive Plan Annual Amendments (Annexation Policy amendment) – May 2014*
- *Determination of Non-Significance – Wenham Comprehensive Plan Amendment (SEP-16-0012) – September 2016*
- *Draft Environmental Impact Statement – Walla Walla Comprehensive Plan Update – March 9, 2018.*

#### *Location of Background Data*

See Lead Agency and Responsible Official address listed above.

#### *Final EIS Purchase Price*

The Final EIS is available for free at the City of Walla Walla website at [www.wallawallawa.gov/2040](http://www.wallawallawa.gov/2040). A CD of the document can be purchased from the Responsible Official at the address listed above for \$5. A hard copy of the document is also available for review at the City of Walla Walla Development Services at the address listed above.

# Distribution List

## **Tribes**

Confederated Tribes of the Umatilla Indian Reservation Cultural Resources and Fisheries Program; Nez Perce

## **Federal Agencies**

US Army Corp of Engineers

## **State Agencies**

Department of Commerce, Department of Ecology, Department of Fish and Wildlife, Department of Natural Resources, Department of Archaeology and Historic Preservation, Department of Transportation South Central, Department of Social and Health Services

## **Regional Agencies**

Walla Walla County Commissioners, Walla Walla County Community Development, Walla Walla County Public Works, Walla Walla Valley Metropolitan Planning Organization, Valley Transit, Columbia REA, Cascade Natural Gas, Pacific Power, Walla Walla Basin Watershed Council, Tri-State Steelheaders

## **Local Agencies**

City of College Place, Walla Walla Public Schools, Fort Walla Walla Museum, Walla Walla Chamber of Commerce, Downtown Walla Walla Foundation

## **Newspapers and Radio**

Newspapers: Union Bulletin, Waitsburg Times

Radio: KGTS, KHSS, KONA

## **Interested Parties**

City of Walla Walla Planning Commission, City of Walla Walla Sustainability Committee, City of Walla Walla Historic Preservation Commission, Home Builders Association of Tri-Cities, Walla Walla Realtors Association. Additionally, 211 individuals were notified via email who signed up for notification during our various outreach events.

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# 1.0 Summary

## 1.1. PURPOSE OF PROPOSED ACTION

The City of Walla Walla is updating its Comprehensive Plan in compliance with the Growth Management Act (GMA). The update includes the following:

- Revisions to the Walla Walla Comprehensive Plan Elements to address growth during the 2018-2038 planning period; land use plan and zoning changes to accommodate growth targets for population, housing, and employment; transportation and capital facilities plans, and housekeeping amendments.
- Amendments and updates to comprehensive plan elements to ensure consistency with the City's review of its plans in response to GMA requirements and Countywide Planning Policies.
- Consideration of changes to the Urban Growth Area (UGA) to accommodate new growth in an area that is easier to serve with urban infrastructure and remove an area that is difficult to serve and can only support low-density development.

Updates to zoning and development regulations for consistency with the updated future land use plan.

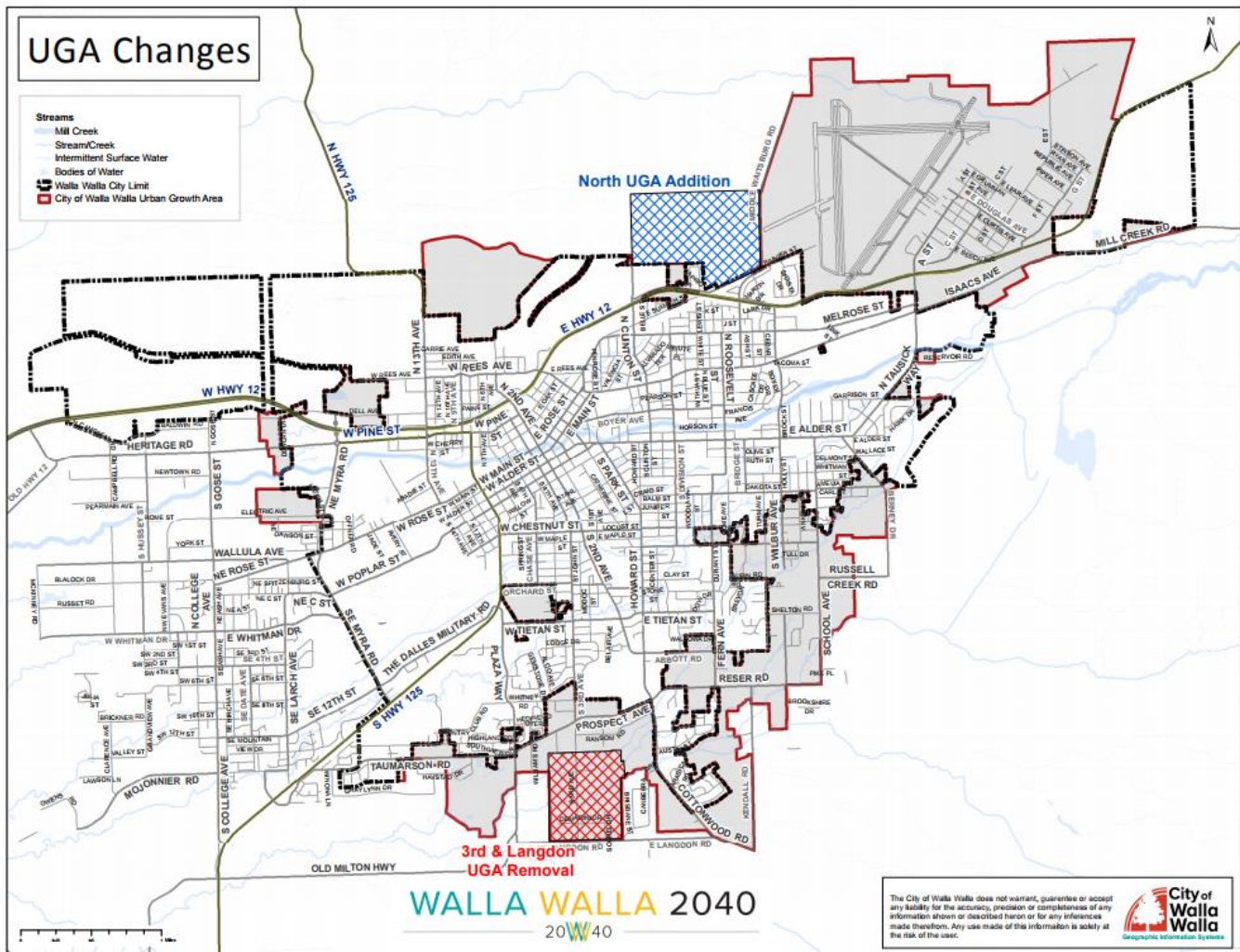
## 1.2. PLANNING AREA

The primary study area includes the City of Walla Walla and its designated Urban Growth Area (UGA), which is currently approximately 13,238 acres. The proposed areas studied for UGA change include:

- Withdrawal of approximately 198 acres near 3rd and Langdon in the south part of the UGA. This area is characterized by more intensive rural development including 1 unit/acre development on septic and wells. The location, development pattern, and presence of critical areas make it cost prohibitive to provide urban services and facilities in this location.
- Addition of 329 acres to the UGA for the North Area properties. The properties are adjacent to existing urban services and facilities and would be used for future mixed use development.

See Exhibit 1-1. for a map of the City of Walla Walla, its UGA, and the proposed UGA changes.

**Exhibit 1-1 Walla Walla Planning Area with UGA Change Study Areas**



Source: Walla Walla, 2018.

**1.3. STATE ENVIRONMENTAL POLICY ACT PROCESS**

This section describes the State Environmental Policy Act (SEPA) and the use of the Environmental Impact Statement (EIS) to solicit public input.

**1.3.1. Purpose of the EIS**

The purpose of this EIS is to assist the public and local government decision makers in considering future growth and land use patterns as well as goals, policies, and development regulations as part of the Walla Walla Comprehensive Plan Update. These broad decisions will provide direction and support for more specific actions by the City, such as capital improvements and implementing regulations.

**1.3.2. Programmatic and Integrated Analysis**

The Draft EIS provided a qualitative and quantitative analysis of environmental impacts as appropriate to the general nature of a comprehensive plan update. This Final EIS includes comments received on the Draft EIS and responses to those comments. Together the Draft EIS and Final EIS make up the EIS for this

proposal.

The adoption of comprehensive plans or other long-range planning activities is classified by SEPA as a nonproject (i.e., programmatic) action. A nonproject action is defined as an action that is broader than a single site-specific project and involves decisions on policies, plans, and programs. An EIS for a nonproject proposal does not require site-specific analyses; instead, the EIS discusses impacts and alternatives appropriate to the scope of the nonproject proposal and to the level of planning for the proposal (Washington Administrative Code [WAC] 197 11-442).

The City has elected to integrate SEPA and the Washington State Growth Management Act (GMA) in both the process and the document. Integration of the environmental analysis with the planning process informs the preparation of GMA comprehensive plan amendments and facilitates coordination of public involvement activities. The information contained in the EIS will assist the City in refining a preferred alternative, related comprehensive plan amendments, and implementing regulations.

### 1.3.3. Phased Review

SEPA encourages the use of phased environmental review to focus on issues that are ready for decision and to exclude from consideration issues already decided or not yet ready for decision making (WAC 197-11-060(5)). Phased review is appropriate where the sequence of a proposal is from a programmatic document, such as an EIS addressing a comprehensive plan, to documents that are narrower in scope, such as those prepared for site-specific, project-level analysis. The City is using phased review in its environmental review of the City Comprehensive Plan update with a programmatic review of the proposal and alternatives. Examples of proposals that may require more area-specific or site-specific SEPA review when more details are known include, but are not limited to, capital improvement projects and private development.

### 1.3.4. EIS Scoping and Public Comment

In accordance with the requirements of SEPA and GMA, the City has provided for continuous public review and comment over the course of the planning process. First, the City conducted scoping, including an opportunity for written and oral comments. In addition, the City held comment period that was initiated with issuance of this Draft EIS. Public meetings will be held before the Planning Commission and City Council to secure the required approvals for the implementation of this proposal. The required approvals are identified in the fact sheet at the front of this document.

## 1.4. PUBLIC INVOLVEMENT

The City of Walla Walla adopted a Comprehensive Plan in compliance with the Washington State Growth Management Act (GMA) in 1996. The Comprehensive Plan was updated significantly in 2007. There have also been minor amendments on an annual basis. Each plan update process included extensive opportunities for public involvement both in plan development and as part of the public involvement and notice provisions required for compliance with SEPA.

The City has begun the 2018 Comprehensive Plan Update as required by the GMA. Staff has completed the Periodic Update Checklist for Cities, public workshops seeking the public's vision for the future, and a survey. Feedback from the public involvement process influenced development of the proposal being analyzed as part of the Draft EIS process. The City received few comments on the Draft EIS. These comments and the City's responses to comments are shown in Chapter 2. Comments received on the Draft

EIS resulted in minor changes to the Comprehensive Plan. However, these changes did not affect the analysis of potential impacts in the Draft Environmental Impact Statement.

## 1.5. PROPOSED ACTION, ALTERNATIVES, AND OBJECTIVES

### 1.5.1. Objectives

As part of describing proposed actions and alternatives, SEPA requires the description of proposal objectives and features. Agencies are encouraged to describe a proposal in terms of objectives, particularly for agency actions to allow for consideration of a wider range of alternatives and measurement of the alternatives alongside the objectives.

The objective of the proposal is to plan for the next 20 years of population and employment growth in Walla Walla and its UGA and to complete a periodic update consistent with the Growth Management Act (GMA). The Alternatives provide different means of implementing City goals for addressing growth. Although the Comprehensive Plan as a whole guides the development of the City over the next 20 years, the following objectives from the 2007 Comprehensive Plan provide more specific direction for this proposal.

- Objective 1.1 To make development decisions within the context of the Comprehensive Plan.
- Objective 1.2 To ensure compatibility among land uses.
- Objective 1.4 To preserve and enhance the natural beauty of Walla Walla's setting and natural environment, including its many streams.
- Objective 2.1 To preserve historic areas and buildings and to identify unique areas of the City for preservation.
- Objective 2.4 To encourage public participation in planning and implementation.
- Objective 3.3 To incorporate urban design to concentrate development and improve transportation and commuting choices.
- Objective 4.1 To provide an array of sustainable employment and housing choices for all income and age levels.
- Objective 4.6 To encourage a broad range of housing options adequate to meet the needs of underserved middle to lower-income households.
- Objective 6.1 To balance commercial, industrial, and residential development with conservation of natural resources.
- Objective 7.1 To promote an approach to growth management to better conserve infrastructure, land, and natural resources.
- Objective 7.2 To maintain a sound financial condition to allow flexibility that ensures the City is in a position to react and respond to changes in the economy and new service challenges without measurable financial stress.

### 1.5.2. Proposed Action and Alternatives

The City of Walla Walla is updating its Comprehensive Plan and development regulations in compliance

with the GMA consistent with the purpose objectives above. To consider alternative means to accomplish the purpose and objectives of the update, the following alternatives were developed for the Draft EIS:

**Alternative 1 No Action:** This is a required alternative under the State Environmental Policy Act (SEPA). This alternative accommodates medium growth through 2038 within the current City limits and UGA boundaries. Minimal policy changes would be made to update the plan to meet new GMA requirements, otherwise no other changes would be made to update the Comprehensive Plan.

**Alternative 2 Medium Growth with UGA Alterations:** This alternative accommodates medium growth through 2038 within the current City limits and a modified UGA boundary. Approximately 198 acres of the southern UGA near “3rd and Langdon” would be removed because they are encumbered with critical areas and difficult to serve with urban infrastructure and services. Approximately 329 acres in the “North Area” would be added to the UGA for new mixed use development. Other land use changes include adoption of a new residential land use designation that would allow for a greater variety of housing forms and increased density, any privately initiated amendments, and amendments to correct consistency and compatibility issues. In addition to meeting new GMA requirements, there would be a number of policy changes to the plan. These policy changes would address: community character, health, energy efficiency, enhancement of the Mill Creek corridor, improvement of parks and gathering spaces, climate change, housing affordability, neighborhood commercial uses, and transportation improvements.

**Alternative 3 High Growth:** Alternative 3 looks at how higher growth could be accommodated within the existing City limits and UGA boundaries. Land use changes would be limited to the adoption of a new residential land use designation that would allow a greater variety of housing forms and increase density, any privately initiated amendments, and amendments to correct consistency and compatibility issues. Policy changes would include the changes in Alternative 2 plus additional policy support for multi-family zoning and infill development.

The following Preferred Alternative was developed in response to Walla Walla County’s proposal for its Comprehensive Plan update. Walla Walla County is not proposing to extend the City of Walla Walla’s UGA into the North Area at this time.

- **Preferred Alternative Medium Growth with UGA Alterations and Identification of Long-term Planning Area.** This preferred alternative is very similar to Alternative 2. It accommodates medium growth through 2038 within the current City limits and a modified UGA boundary. Approximately 198 acres of the southern UGA near “3rd and Langdon” will be removed because they are encumbered with critical areas and difficult to serve with urban infrastructure and services. However, the approximately 329 acres in the “North Area” will not be added to the UGA. Instead it will be identified as a Long-term Planning Area for new mixed-use development for future growth beyond the 20-year planning horizon. Other land use and policy changes identified in Alternative 2 are included in the Preferred Alternative.

The Preferred Alternative is within the range of alternatives studied in the DEIS. It has similar impacts to Alternative 2. However, some impacts are reduced because the North Area is not added to Walla Walla’s UGA. Instead it is identified as future planning area for further study.

The following table compares the features of the three Draft EIS alternatives and the Preferred Alternative.

**Exhibit 1-2 Alternative Comparisons**

<b>Topic</b>	<b>Alternative 1 (No Action)</b>	<b>Alternative 2 Moderate Growth with UGA Changes</b>	<b>Alternative 3 Higher Growth without UGA Changes</b>	<b>Preferred Alternative  Moderate Growth, UGA Changes, Long- term Planning Area</b>
Comprehensive Plan and Development Regulation Update				
Policy Updates	Consistency updates only	Consistency updates plus community character, health, energy efficiency, enhancement of the Mill Creek corridor, improvement of parks and gathering spaces, climate change, housing affordability, neighborhood commercial uses, and transportation improvements.	Same as Alternative 2, plus additional policies to support multi-family housing and infill.	Same as Alternative 2.
Zoning Map and Regulations	Current Map only	Update	Update	Update
Capital Facility Plan Update	Current Plan	Update	Update	Update
UGA Changes				
3 <sup>rd</sup> and Langdon	Remain in UGA	Remove from UGA	Remain in UGA	Remove from UGA
North Area Properties	Continue as Rural	Expand UGA	Continue as Rural	Continue as Rural, but designate as a long-term planning area for future study.
Population (net increase) 2017-2038	5,690	5,690	6,480	5,690

Source: BERK Consulting, 2018.

## 1.6. SUMMARY OF IMPACTS AND MITIGATION MEASURES

### 1.6.1. Earth, Water, and Natural Resources

#### *How did we analyze Earth, Water, and Natural Resources?*

The DEIS analyzes potential impacts to Earth, Water, and Natural Resources by comparing existing conditions to the projected land use in each alternative. It looks at potential effects of activities associated with urban development, including vegetation removal and increased impervious surfaces. Existing conditions were identified through review of City documents such as critical area studies, maps, and shoreline studies.

*What impacts did we identify?*

Potential impacts are related to increased urbanization including: habitat loss, decreased vegetation, increased impervious surfaces, soil compaction, and environmental contamination.

*What does it mean? What is different between the alternatives?*

Alternative 2 allows the opportunity for additional protection of critical areas and habitat with the removal of the 3<sup>rd</sup> & Langdon area from the UGA. Alternative 3 has the highest level of urban growth and is most likely to result in impacts.

In Alternative 1, urban development is expected to change the natural landscape of the City, which may increase erosion, soil compaction, impervious surface coverage, and decrease vegetation. This may lead to increase potential for landslides and habitat loss. Increases in impervious surfaces could affect water flows and reduce groundwater recharge. Changes in waterflow could also include changes in water quality and result in more contaminants in aquatic organisms. Alternative 2 and the Preferred Alternative have the same potential impacts as Alternative 1 for most of the City. However, the removal of 198 acres of rural land encumbered by critical areas in the 3<sup>rd</sup> & Langdon area would provide additional opportunities to maintain habitat corridors and preserve critical areas. Alternative 3 would provide the highest amount of growth and increase the likelihood of the impacts discussed in Alternative 1.

*What are some solutions or mitigation for the impacts?*

The City's Critical Area regulations, Shoreline Master Program, stormwater regulations, and tree protection regulations will mitigate adverse impacts. Changes to zoning codes or other regulations, such as landscaping regulations, could further reduce or minimize the cumulative impacts of increased urban development.

*With mitigation, what is the ultimate outcome?*

There will be some losses of habitat and vegetation and some increase in pollutants as a result of urban development. Although not wholly unavoidable, mitigation can reduce the impacts.

## 1.6.2. Land Use and Housing

*How did we analyze Land Use and Housing?*

We used current land use information from the County Assessor to analyze existing patterns of land use and housing. Projected levels of growth and policy change in each of the alternatives were compared to existing land use conditions to identify areas where growth could potentially occur, how land use might change, and if there were potential land use compatibility issues.

*What impacts did we identify?*

Growth in Walla Walla will consume vacant lands for residential and commercial development. Some lands could also be redeveloped into higher-density development.

*What does it mean? What is different between the alternatives?*

Alternative 1 would reinforce existing land use patterns with commercial growth along highways and arterials and with residential development in outlying areas, mostly to the south and east of the planning area. Residential development will primarily consist of single-family homes since there are no redevelopable lands zoned for multi-family development. Alternative 2 would consolidate residential land use designations, making it easier to rezone residential areas for increased density in the City or for construction of additional housing units. Removing the 3<sup>rd</sup> & Langdon area would have little effect on land use patterns because it is difficult to develop and serve. However, adding the North Area Properties would make it possible to develop that area for a mixed use Master Planned Community in the north part of Walla Walla. This alternative would best allow higher-density residential development and promote housing diversity. Alternative 3 would result in the greatest conversion of land uses within the existing City planning area. This would require policy and code updates to accommodate a high level of growth. The Preferred Alternative would be similar to Alternative 2, but a new mixed used community would not be designated in the North Area because it would not be included in the UGA.

*What are some solutions or mitigation for the impacts?*

Changes to the zoning code, development regulations, and design standards would allow additional development, ensure quality of design, and make it possible for additional diversity and density of housing.

*With mitigation, what is the ultimate outcome?*

There will be additional development of vacant and underutilized lands and a general increase in intensity of development. Adverse effects can be managed through appropriate mitigation, but some level of change is an unavoidable aspect of growth.

### 1.6.3. Plans and Policies

*How did we analyze Plans and Policies?*

The DEIS examines the plans, policies, and regulations that guide or inform the proposal. This includes the Growth Management Act (GMA), the Walla Walla Countywide Planning Policies (CPPs), the Walla Walla Valley Metropolitan Planning Organization (WWVMPO) and Sub-Regional Transportation Planning Organization (SRTPO), Walla Walla's current Comprehensive Plan and development regulations.

*What impacts did we identify?*

The alternatives are generally consistent with the plans and policies. However, it should be noted that Alternatives 2 and 3 include updates to the Walla Walla Comprehensive Plan to accommodate changes necessary to implement these alternatives, such as policies supporting community character, healthy, energy efficiency, housing affordability, transportation improvements, and land use and zoning changes to support mixed use.



*What does it mean? What is different between the alternatives?*

Alternatives 1 reinforces existing development patterns and policies in the current Comprehensive Plan. Alternative 2 supports population growth within a UGA boundary that is easier to serve with public services and utilities; it also provides more protection for critical areas by removing the 3<sup>rd</sup> & Langdon area from the UGA, as well as considers infill development. Alternative 3 might better accommodate higher growth through additional multi-family zoning and infill development, which makes good use of existing infrastructure. The Preferred Alternative provides more protection for critical areas by removing the 3<sup>rd</sup> & Langdon area from the UGA and is consistent with the latest draft of the Walla Walla County Comprehensive Plan, which does not recommend expansion of the UGA into the North Area at this time.

*What are some solutions or mitigation for the impacts?*

Alternatives 2 and 3 contain changes to plans and policies that prevent these actions from inconsistency with adopted plans and policies. Regular updates to plans, including those for capital facilities and transportation, will ensure future consistency.

*With mitigation, what is the ultimate outcome?*

With mitigation, the Comprehensive Plan would be consistent with state and regional policy guidance and requirements. No significant unavoidable adverse impacts have been found.

#### 1.6.4. Community Character and Historic Preservation

*How did we analyze Community Character and Historic Preservation?*

The DEIS compared the existing conditions for Community Character and Historic Preservation and analyzed how they may change in response to increased urban development.

*What impacts did we identify?*

New growth will bring new development, most likely to occur on vacant and redevelopable lands throughout the City. New development has the potential to alter existing character both in terms of increasing density and by introducing new styles of development. Redevelopment pressures may impact the preservation or adaptive reuse of buildings in historic areas, reducing historic character.

*What does it mean? What is different between the alternatives?*

All alternatives have the potential to alter community character, including historic preservation. Alternative 3 includes the highest amount of growth and has the most potential for impacts. Alternative 2 would make the North Study Area properties available for new development, which could reduce impacts related to new development in other parts of the City. However, it will change the character of that area from rural to urban.

*What are some solutions or mitigation for the impacts?*

Policy changes in the Comprehensive Plan in Alternatives 2 and 3 would support historic preservation efforts that could mitigate increased pressure to redevelop in historic districts. The adoption of design guidelines and a Parks and Open Space plan could potentially mitigate or minimize impacts related to

increased density.

*With mitigation, what is the ultimate outcome?*

As Walla Walla grows, some community character will be unavoidably altered, but mitigation measures can help to mitigate the negative impacts of this outcome.

### 1.6.5. Transportation and Traffic

*How did we analyze Transportation and Traffic?*

Traffic counts from the past three years were used as a baseline for a review of how growth under each of the alternatives would impact level of service at key intersections throughout the City and UGA.

*What impacts did we identify?*

Additional growth will result in a reduced level of service at a handful of intersections throughout the city.

*What does it mean? What is different between the alternatives?*

Alternative 1 and Alternative 3 would result in four intersections falling below the adopted level of service standard without mitigation: 9<sup>th</sup> Avenue/Dalles Military Road/Plaza Way; 9<sup>th</sup> Avenue/Pine Street; Howard Street/Chestnut Street; and 3<sup>rd</sup> Avenue/Tietan Street. Alternative 2 would affect all the above intersections except 9<sup>th</sup> Avenue/Pine Street, but it would require an additional feasibility study for the vicinity of US Highway 12/Clinton Street. Alternative 3 would result in the same impacts as Alternative 1, plus impacts to Cottonwood Road/Prospect Avenue. The Preferred Alternative would likely result in the same four intersections falling below adopted level of service standard without mitigation as in Alternative 1 and 3. It is unlikely to result in the additional impacts of Alternative 2 as those are primarily related to expansion of urban land uses into the North Area. Nor is it likely to result in the additional impacts of Alternative 3, which are related to a higher growth assumption.

*What are some solutions or mitigation for the impacts?*

The City is working on a Transportation Management Plan concurrently with its Comprehensive Plan. That plan will identify concurrency requirements to address mitigation of impacts. Additional measures such as an interchange feasibility study for the US 12, changes in signalization, or lane improvements are anticipated to mitigate impacts.

*With mitigation, what is the ultimate outcome?*

Adverse impacts are likely to be mitigated through various types of intersection improvements, but growth will bring an unavoidable increase in traffic.

### 1.6.6. Public Services, Capital Facilities, and Utilities

*How did we analyze Public Services, Capital Facilities, and Utilities?*

The DEIS uses population projections to estimate future demand for water and wastewater utilities, parks facilities, fire and police protection, and public schools. Estimated needs are compared to current and

future estimates of capacity.

*What impacts did we identify?*

All alternatives will increase the demand for public services, utilities, and capital facilities. Without mitigation there will be a need for additional police and fire services, public school services, and parks facilities under all the alternatives. There is adequate capacity in the water and wastewater facilities to accommodate future growth under all the alternatives.

*What does it mean? What is different between the alternatives?*

Alternatives 1 and 3 would use the existing service area for City-provided public services and utilities. Growth will generate localized demands, particularly with the higher growth projected in Alternative 3, but improvements will be located within the existing service area. Alternative 2 and the Preferred Alternative alter the UGA boundaries, which would modify the service area. The 3<sup>rd</sup> & Langdon area, which is difficult to serve due to critical areas and other constraints, would be removed. Expansion of the service area into the North Area Properties is expected to be more efficient in Alternative 2.

*What are some solutions or mitigation for the impacts?*

Comprehensive Plan policies require maintaining an adequate level of service for public services and facilities without straining City financial resources. The City also plans to maintain and regularly update functional plans for water, wastewater, capital facilities, and parks that specifically plan for future growth, capital facility needs, operation, and maintenance. Increased tax revenue related to growth may pay for some upgrade facilities and services. The City may also consider impact fees and other financial tools to provide facilities and services.

*With mitigation, what is the ultimate outcome?*

The City should be able to maintain adequate levels of service with mitigation.

**1.7. PRIVATELY INITIATED COMPREHENSIVE PLAN AMENDMENTS**

In addition to the overall changes to the Comprehensive Plan, Alternatives 2 and 3 include a series of privately initiated Comprehensive Plan Amendments that are under City review. These minor adjustments to the Future Land Use Map are detailed in the table and maps that follow in Exhibit 1-3 and 1.7-2.

**Exhibit 1-3. Privately Initiated Comprehensive Plan Amendments**

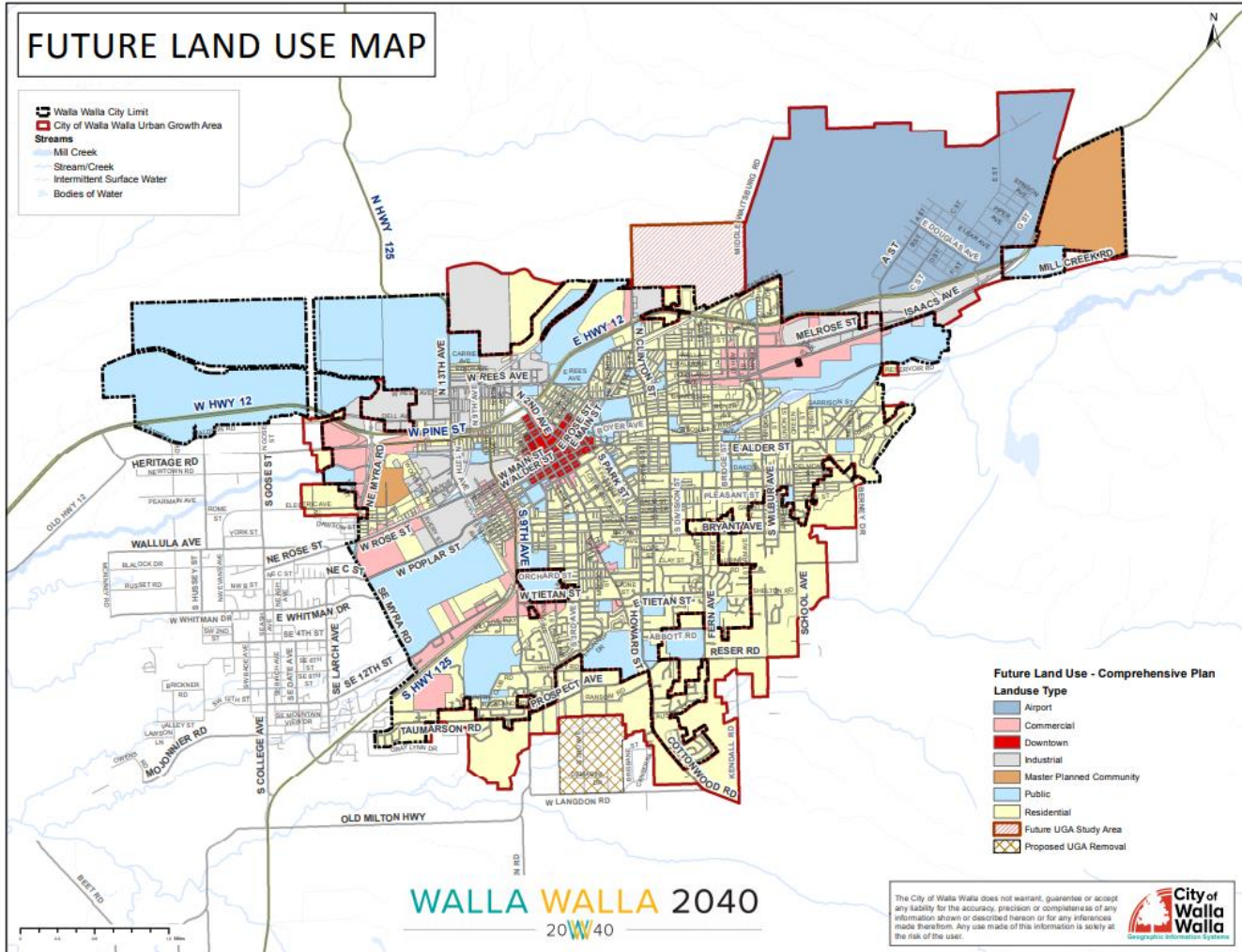
Map Amendment Number	Applicant	Location and Parcel Number	Current Designation	Requested/ Proposed Land Use	Proposed/ Corresponding Zoning
1	Galen Tom	Myra Road and Dell Ave 350724130036, 350724420023, 350724420022, 350724410071	Residential (R-96)	Commercial and Industrial	Highway Commercial and Light Industrial/ Commercial
2	Steven Pao	625 Woodland Ave	Residential (R-96)	Industrial	Light Industrial/ Commercial

		360719330002			
3	Steven Pao c/o Davis Trust	537 Woodland Ave 360719330011	Residential (R-60)	Industrial	Light Industrial/ Commercial
4	Mark Anderson	500 block of Woodland Street 360719330027	Residential (R-60)	Industrial	Light Industrial/ Commercial
5	City of Walla Walla	East of Woodland Ave (400 Block) 360719340032	Residential	Industrial	Light Industrial/ Commercial
6	City of Walla Walla	West of Woodland Ave (300 Block) 360730210012	Residential	Industrial North and Residential South	Light Industrial/ Commercial, South Multi-Family Residential
7	Gary Petersen	North 11th Ave at Cherry Street 360719593802	Residential (R-60)	Industrial	Light Industrial/ Commercial
8	City of Walla Walla	Country Club Road (WW Country Club Driving Range)  360731510115, 360731410067, 360731410061	Residential	Public	Public Reserve
9	City of Walla Walla	8th and Poplar (St. Mary's Parking Lot) 36072952080436	Residential	Public	Public Reserve
10	City of Walla Walla	Downtown	Historic and Downtown Boundary	Remove and Amend Boundary	Varies
11	City of Walla Walla	1400 Block of Lower Waitsburg Road  360716650002, 360716320029	Residential (R-96)	Industrial	Light Industrial/ Commercial
12	Anthony Wenham	Highway US 12 /Clinton Street  360717440036	Residential (R-72)	Industrial	Light Industrial/ Commercial
13	Evans Trust	Lower Waitsburg Road  360717410002, 360717440028	Residential (R-96)	Approx. 15 Acres Commercial adjacent to Hwy 12	15 Acres Highway Commercial; rezone 15 acres to Multi-Family Residential
14	City of Walla Walla	Tietan/Modoc Street (WW Clinic)  360732120027, 360732120010, 360732120009, 360732120014	Residential	Public	Public Reserve
15	City of Walla Walla	1625 E Alder Street (Church)	Residential	Commercial	Highway Commercial

		360722560002			
16	City of Walla Walla	Isaacs Avenue/Melrose Street	Commercial	Industrial	Light Industrial/Commercial
17	City of Walla Walla	Tausick Way 360722140049	Public	Residential	Multi-family Residential

Source: City of Walla Walla, 2018.

**Exhibit 1-4. Land Use Changes Related to Privately Initiated Amendments**



Overall, the changes represented by these private amendments have no significant impact and no impact beyond what is studied in Chapter 3 of this DEIS. The table below in Exhibit 1-5 evaluates the potential level of impact of each request.

**Exhibit 1-5. Specific Impacts Related to Privately Initiated Amendments**

Map Amendment Number	Earth, Water, and Natural Resources <sup>a</sup>	Land Use and Housing	Plans and Policies	Community Character and Historic Preservation	Traffic and Transportation <sup>f</sup>	Public Services, Capital Facilities, and Utilities
1	○	⊙ <sup>b</sup>	○	○	○	○
2	○	⊙ <sup>b</sup>	○	⊙ <sup>d</sup>	○	○
3	○	⊙ <sup>b</sup>	○	⊙ <sup>d</sup>	○	○
4	○	⊙ <sup>b</sup>	○	○	○	○
5	○	⊙ <sup>b</sup>	○	○	○	○
6	○	⊙ <sup>b</sup>	○	○	○	○
7	○	⊙ <sup>b</sup>	○	⊙ <sup>e</sup>	○	○
8	○	⊙ <sup>b</sup>	○	○	○	○
9	○	⊙ <sup>b</sup>	○	○	○	○
10	○	○	○	○	○	○
11	○	⊙ <sup>b</sup>	○	○	○	○
12	○	⊙ <sup>b</sup>	○	○	○	○
13	○	⊙ <sup>b</sup>	○	○	○	○
14	○	⊙ <sup>b</sup>	○	○	○	○
15	○	⊙ <sup>b</sup>	○	○	○	○
16	○	⊙ <sup>b</sup>	○	○	○	○
17	○	⊙ <sup>c</sup>	○	○	○	○

**Notes:**

- a. At the policy level there is no anticipated impact, but environmental review is phased and will take place on future development proposals.
- b. No current housing units will be lost. This change represents a small loss of residential capacity, but there is adequate capacity Citywide under all alternatives to address the loss.
- c. This may result in a small increase in residential capacity, but does not significantly affect citywide capacity.
- d. This proposed change affects an area that is currently in transition between residential and industrial character, so the potential character impacts are unknown.
- e. This would alter residential character in the area in which the proposal is located.
- f. Potential transportation impacts of these changes are included in the Traffic and Transportation analysis

**KEY:** ○ No additional impact beyond what is studied in the DEIS ⊙ May have a minor impact ● Significant Impact

Source: City of Walla Walla and BERK Consulting, 2018.

## 1.8. MAJOR ISSUES, SIGNIFICANT AREAS OF CONTROVERSY AND UNCERTAINTY, AND ISSUES TO BE RESOLVED

All alternatives result in increased population, housing, and growth that will lead to some unavoidable changes to the environment, land use, housing, transportation, and capital improvements. Prior to development of the FEIS, the following issues are anticipated to be resolved:

- Selection and refinement of future land use and zoning within the ranges studied by the alternatives.
- Refinement of the goals and policies of the Walla Walla Comprehensive Plan.
- Refinements on proposed code changes to implement actions within the range studied by the alternatives.
- Refinements to the growth projections and allocations for Walla Walla County as a whole.
- Consideration of the requests for UGA changes.

Key environmental issues and options facing decision makers include:

- Alternative land use patterns in relation to the 20-year growth estimates and the community's vision for Walla Walla.
- The relationship between the land use patterns and the natural environment, land use compatibility, the availability of housing, and community character.
- The effect of growth on the demand for public services, utilities, parks, and transportation.

## 2.0 Comments and Responses

The City of Walla Walla received only one comment on the DEIS during the comment period. It was from the Washington State Department of Transportation. However, the City has chosen to include other comments that it received related to issues in the DEIS and provide responses to those comments.

All comments are shown on the pages that follow. Comment letters are numbered one through five (1-5), with individual comments numbered within each letter. After the comment letters is a table of responses from the City of Walla Walla.



Comment 1 – Confederated Tribes of the Umatilla Indian Reservation

**Confederated Tribes of the  
Umatilla Indian Reservation**  
Department of Natural Resources  
Administration



46411 Timine Way  
Pendleton, OR 97801

www.ctuir.org      ericquaempts@ctuir.org  
Phone 541-276-3165      Fax: 541-276-3095

September 18, 2017

Letter 1

Elizabeth Chamberlain  
Development Services Director  
City of Walla Walla  
55 E. Moore Street  
Walla Walla, WA 99362

Delivered electronically to: [echamberlain@wallawalla.gov](mailto:echamberlain@wallawalla.gov)

Dear Ms. Chamberlain:

Thank you for the opportunity to provide input to the City of Walla Walla Comprehensive Plan update. We appreciate previous emphasis on incorporating Mill Creek as a vital community asset and the work detailed in both the Comprehensive Plan and the Downtown Master Plan to revitalize Mill Creek as a “spine of amenities that give special identity to the area” (City of Walla Walla, 2004). In particular, we support the following goals and objectives identified in the 2007 Comprehensive Plan: Goals 1, 3, and 6 and objectives 1-4, 3-2, 6-1, 6-2, 6-3, and 6-4.

The Lower Mill Creek Habitat and Passage Assessment and Strategic Action Plan that was recently completed by the CTUIR in collaboration with a broad group of local representatives provides additional actions and recommendations to improve fish passage, fish habitat, and the vital touchstones characteristic of healthy river systems identified in the CTUIR’s *River Vision*<sup>1</sup>, while maintaining or improving flood control and facilitating support among key stakeholders. With a plan focusing on multi-use, multi-purpose goals and objectives, many of the recommendations in the Lower Mill Creek Habitat and Passage Assessment and Strategic Action Plan echo and reinforce the City of Walla Walla’s desire to embrace the preservation and enhancement of Mill Creek as a natural system and a community amenity. In particular, portions of the Downtown Master Plan suggest concepts very similar to those in the Strategic Action Plan, such as sections of Mill Creek having a “naturalized channel section,” additions of pedestrian paths to create a “Mill Creek Walk,” and generally incorporating Mill Creek into the City as an amenity rather than an eyesore.

With the above goals and objectives in mind, the CTUIR asks that you consider the following recommended changes and/or additions to the Comprehensive Plan.

1. Continue to emphasize goals and policies identified in the 2007 Comprehensive Plan including Goal 6 (Walla Walla will protect and enhance its natural environment for the safety and enjoyment of this generation and those that follow) and the policies identified in section 2.3.7 Environment and Natural Resources and section 2.3.8 Land Use.

1-1

<sup>1</sup> The *River Vision* touchstones are from the “*Umatilla River Vision: A Process-Based Approach to Umatilla River Restoration to Support Tribal Harvest and Use of First Foods*,” which was prepared for the Department of Natural Resources of the Confederated Tribes of the Umatilla Indian Reservation and is available online at: <http://data.umatilla.nsn.us/fisheries/downloads/CTUIRDNRUmatillaRiverVision100108.pdf>.

CTUIR DNR Letter to Elizabeth Chamberlain  
 Subject: Walla Walla Comprehensive Plan Update  
 September 18, 2017  
 Page 2 of 2

2. Develop a Mill Creek Comprehensive Improvement Plan as previously recommended in the Comprehensive Plan and the Downtown Master Plan. This Improvement Plan should incorporate portions of the Lower Mill Creek Assessment and Strategic Action Plan as a stakeholder-supported path forward for the future of the downtown portion of Mill Creek. 1-2
3. Create a resource protection overlay district along Mill Creek and its distributaries. This district would have a specific plan that encapsulates the long-term management strategy for lower Mill Creek and its distributaries within the City limits. The areas targeted for restoration/infrastructure improvements will be identified within the special district map and all proposed new development or proposed renovation or repair of existing buildings and infrastructure will be required to comply with the special district's plans for stream restoration and ROW expansion. 1-3
4. Increase shoreline buffers, particularly in areas where the buffer is currently zero feet (no buffer). Recommended buffers should be 200 feet on undeveloped properties along Mill Creek, 75 feet on Yellowhawk Creek, and 50 feet on all other creeks. 1-4
5. Create a land use code for non-development that can be used to protect open spaces and prevent new development along Mill Creek and its distributaries. 1-5
6. Adopt more protective restrictions than are currently required for new construction in close proximity to Mill Creek, Yellowhawk Creek, and Garrison Creek, thereby preserving opportunities for floodplain expansion and connectivity. 1-6
7. Develop a plan for managing old and/or condemned structures within or adjacent to the lower Mill Creek ROW. Our recommendation is that these structures be removed entirely or at a minimum, require innovative designs that incorporate and maintain stream corridor features. 1-7
8. Amend critical areas designations to further protect shorelines and floodplains.
9. Support the development of greenways to encourage community connection to Mill Creek. 1-8
10. Emphasize protection rather than mitigation in all aspects of the Comprehensive Plan.

I appreciate your consideration of the above recommendations for the update of the City of Walla Walla Comprehensive Plan. CTUIR staff desire to work closely with your project team in developing the new Plan, specifically in development of goals and objectives that are consistent with the overall goal established in the CTUIR Lower Mill Creek Passage and Habitat Assessment and Strategic Action Plan. In addition, we are working with City of Walla Walla staff on development of a collaborative Mill Creek water management plan that will hopefully have benefits to both municipal and instream flow needs. The CTUIR, with local, state and federal partners, continues to seek restored Mill Creek ecological functions necessary to achieve water quality standards, delist ESA-listed bull trout and steelhead, and restore and sustain the CTUIR's First Foods and our Treaty-secured rights based on them. Please do not hesitate to contact me at the number above or Mike Lambert, Habitat Program Supervisor, at 541-429-7240, if you have questions regarding these comments. Thank you.

Sincerely,  
  
 Eric Quampts  
 Director, Department of Natural Resources

Comment 2 – Department of Archaeology and Historic Preservation



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

February 5, 2018

Letter 2

Ms. Melissa Shumake  
City of Walla Walla  
55 East Moore Street  
Walla Walla, Washington 99362

In future correspondence please refer to:  
Project Tracking Code: 2018-02-00877  
Re: Walla Walla Comp Plan Update Determination of Significance and Request for Comments

Dear Ms. Shumake:

The Washington State Department of Archaeology and Historic Preservation (DAHP) is in receipt of the above referenced Determination of Significance and Request for Comments on the Scope of the EIS. In response, we have taken the opportunity to review drafts elements of the Comprehensive Plan Update including the draft Historic Preservation element. As a result of our review we submit the following comments and recommendation:

- Thank you for drafting and including the historic preservation element as part of the Walla Walla 2040 comprehensive plan update. We note and support the goals and policies for historic preservation work in Walla Walla. We also note the Policy Connection paragraph and the Translating Policy into Action matrix as a valuable tool for implementation.
- While the Policy Connection paragraph touches upon several policy implications of historic preservation with other planning issues, upon reviewing the other draft planning elements (Capital Facilities, Natural Resources, Parks & Recreation, Land Use, etc.) we are concerned that the text does not recognize the connections or overlap of historic preservation with these other elements. Historic preservation efforts will affect, and are affected by, progress in achieving other goals and policies in the plan. However, the language in the other planning elements does not appear to recognize the connections. As a result, opportunities could be missed that would otherwise work toward mutually supportive goals, for instance in land use, parks, natural resources, and capital facilities.
- Therefore, we recommend that other planning elements in the comprehensive plan draft be reviewed and revised with language that supports and builds upon relationships with historic preservation goals. One example is Land Use Policy 1.4 that could be changed to read as follows:

*Review new development proposals to ensure they support the objectives of the Comprehensive Plan such as land use, transportation, community character, historic preservation, and sustainability.*

2-1



Ms. Melissa Shumake  
February 5, 2018  
Page Two

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) under the auspices of the State Environmental Policy Act (SEPA). Please note that in order to streamline our responses, DAHP requires that all documents related to project reviews be submitted electronically. Correspondence, reports, notices, photos, etc. must now be submitted in PDF or JPG format. For more information about how to submit documents to DAHP please visit: <http://www.dahp.wa.gov/programs/shpo-compliance>. To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed guidelines including requirements for survey reports. You can view or download a copy from our website: [www.dahp.wa.gov](http://www.dahp.wa.gov).

Thank you for the opportunity to review and comment. If you have any questions, please contact me at 360-586-3073.

Sincerely,



Gregory Griffith  
Deputy State Historic Preservation Officer

- C: Patrick Baird, Nez Perce Tribe, THPO  
Jon Campbell, Washington State Advisory Council on Historic Preservation  
Catherine Dickson, Confederated Tribes of the Umatilla Indian Reservation  
Katherine Ferguson, Cultural Resources, Walla Walla VAMC  
Paul Johnson, Growth Management Services, Commerce  
Mike Rizzitiello, City of College Place



Comment 3 – Washington State Department of Transportation – February 1, 2018



South Central Region  
 2809 Rudkin Road  
 Union Gap, WA 98903-1648  
 509-577-1600 / FAX: 509-577-1603  
 TTY: 1-800-833-6388  
 www.wsdot.wa.gov

February 1, 2018

City of Walla Walla Development Services  
 55 East Moore Street  
 Walla Walla, WA 99362

Letter 3

Attention: Melissa Shumake, Planner

Subject: City of Walla Walla – Comprehensive Plan Update  
 Request for Comments on Scope of EIS

We have reviewed the scope of the Environmental Impact Statement (EIS) and supporting information for the City’s Comprehensive Plan Update. We support your efforts and have the following comments.

1. US Highway 12 and State Route 125 are part of the National Highway System and pass through the city limits of Walla Walla. US 12 is a Limited Access Partially Control facility and access is limited to the current interchanges and intersections. Access designations and limitations and Level of Service (LOS) deficiencies of these facilities should be included in the EIS and subsequent impact analysis. 3-1
  
2. The Comprehensive Plan information did not include an updated Transportation Element. A Transportation Element will be essential for our review of the Comprehensive Plan. The Transportation Element will need to include a traffic analysis for both the current and future conditions. The EIS should show details on the proposed land use changes including location and potential increases to densities. The state highways are an integral part of the transportation network in the Walla Walla area and region. The analysis needs to include the state transportation system as part of the study. 3-2

The traffic analysis should reflect the updated Transportation Element and must include state highways in addition to local systems as part of the transportation inventory. Also needed are freight movement, single occupancy vehicle alternatives, airport, pedestrian, and bicycle components.

In addition, LOS standards, traffic forecasts for 10-year period, deficiency analysis, consistency determination with adopted transportation planning policies and plans, and a multi-year financial plan are also required. If funding is insufficient for any required improvements, identification of how additional funding will be raised or land use assumptions reassessed to ensure that LOS will be met.

3. The current and future traffic analysis must not include any improvements to the state system without agreement from WSDOT. 3-3

City of Walla Walla  
 Comprehensive Plan Update – Comments on Scope of EIS  
 February 1, 2018  
 Page 2

4. The proposed northern Urban Growth Area (UGA) annexation area is located near the intersection of Lower Waitsburg Road and US 12 and would allow mixed-use developments. Recently, a proposed industrial park development (LWR Industrial Park/Corliss Commercial Development, SPR-15-002) in this vicinity was required to install vehicle movement restrictions at US 12/Lower Waitsburg intersection that limit through traffic across US 12 and also left/right turns from Lower Waitsburg Road and Clinton Street onto US 12. These improvements helped mitigate impacts of that development. However, the proposed 329 acre master planned community and UGA expansion would ultimately generate higher traffic volumes which requires an impact analysis to the existing transportation system.

3-3

The Walla Walla Valley Metropolitan and Regional Transportation Plan 2040 (March 2016) identified a future improvement, specifically a grade separated interchange at US 12/Lower Waitsburg/Clinton Street. The DKS Draft Memo Walla Walla Transportation Plan Background Document Review Figure 3 (2/16/2017), indicates a future interchange would be constructed at US 12/Middle Waitsburg Road at Rainier Drive/Wellington Avenue which is currently an undercrossing. These improvements are unfunded.

Further development of the UGA north of US 12 requires traffic impact analyses to identify potential issues related to the transportation network.

5. The proposed comprehensive plan change from residential to commercial uses near US 12 at Myra Road has the potential to generate increased traffic volumes and should also be evaluated for impacts to the recently improved interchange at this location.
6. We support the policies and requirements that promote multi-modal, transit, non-motorized and active transportation systems.

3-4

Thank you for the opportunity to review and comment on scope of the EIS for the City's Comprehensive Plan update. We are interested in reviewing and commenting on the completed draft and the EIS, as well as the updated comprehensive plan. If you have any questions, please contact John Gruber at (509) 577-1636.

Sincerely,



Paul Gonseth, P.E.  
 Planning Engineer

PG: jg/df  
 cc: Larry Batterton, Area 4 Maintenance Superintendent  
 Todd Daley, WSDOT SCR Traffic Engineer

Comment 3A – Washington State Department of Transportation – March 30, 2018



South Central Region  
2809 Rudkin Road  
Union Gap, WA 98903-1648  
509-577-1600 / FAX: 509-577-1603  
TTY: 1-800-833-6388  
www.wsdot.wa.gov

March 30, 2018

City of Walla Walla Development Services  
55 East Moore Street  
Walla Walla, WA 99362

RECEIVED  
APR 02 2018

Attention: Elizabeth Chamberlain, Director

Letter 3 - A

Subject: City of Walla Walla – Comprehensive Plan Update

The Washington State Department of Transportation has reviewed the Draft Environmental Impact Statement (EIS) and Draft Comprehensive Plan Update documents. We understand that the North Area UGA expansion is no longer part of the update but will be part of a future study and periodic update. We look forward to working with you on future studies and updates.

We have no further comments and thank you for the opportunity to provide comments. If you have any questions, please contact John Gruber at (509) 577-1636.

Sincerely,

Paul Gonseth, P.E.  
Planning Engineer

PG: jg/df

cc: Larry Batterton, Area 4 Maintenance Superintendent  
Todd Daley, WSDOT SCR Traffic Engineer

## Comment 4 – RL McFarland

1

1/31/18

Letter 4

To: Melissa Shumake, Planner, Walla Walla Development Services

From: Richard L. McFarland

Re: Determination of Significance and **Request for Comments** on Scope of EIS Walla Walla Comprehensive Plan Update Environmental Impact Statement

\*UGA addition of 329.4 acres referred to as the “north properties”.

\*UGA removal of 197.8 acres referred to as “3<sup>rd</sup> and Langdon”.

\*Public Notice published in the Union-Bulletin 12/26/17.

The Public Notice, under the heading of “**EIS Required**”, states the following:

*“The lead agency has identified the following areas for discussion in the EIS: earth, water and natural resources, plants and animals, relationship to plans, policies and regulations, transportation and traffic, and public services and utilities.”*

**To begin:**

Under the heading of “**Description of Proposal**”, the public is told that the “*Zoning for the north properties would allow for mixed-use development.*”

Without having a better understanding of what “*mixed use development*” specifically means, it is impossible to directly address issues related to what could be built and for what use and under what specific conditions, regulations and/or exceptions along with what combination of necessary zoning it would involve.



Therefore, I can only address the obvious “first step” issues that any development on the “northern properties” will encounter.

The term “*relationship to plans*” (per the Public Notice) suggests a very general theme. Consequently, I am going to offer input that I think fits this “request for comment” to make sure it is in the public record and available for reference, consideration and further research.

**Input:**

Why is the City of Walla Walla really applying to add land from the County of Walla Walla into the City of Walla Walla’s UGA? What is the Big Picture?

It is my understanding that under the guidelines of the Growth Management Act (GMA) a city performs a “capacity study” that shows, among many statistics found in the documentation of a city’s participation in and with the GMA, that a city either has-or-does- not-have sufficient land(s) defined by a city’s UGA boundaries to allow for future growth.

Does the city of Walla Walla have on file an up-to-date “capacity study” to help in documenting their application for adding more land “into” their UGA?

In line with this, is their a required “direct relationship” between the release of UGA acreage on the south side (3<sup>rd</sup> and Langdon”) and the addition of the “north properties” acreage?

I have looked around Washington State with regards to the relationship cities have with their UGA needs and existing boundaries and found that if and when a city shows an interest in expanding their UGA needs *unnecessarily*; public and private concerns (city and county) have spoken up and successfully addressed the

4-1

fact that UGA boundaries do not need to be extended simply because city management wants to.

In the Walla Walla application, it appears to me the boundaries do not need to be extended (*County Community Development has come to this conclusion*) consequently the “why” question falls under a bright spotlight.

When an application is made by an individual or individuals to do something/anything related to “development” (as suggested by the term “mixed-use development”), a primary question automatically is brought to the table - “who benefits”.

4-1

With the city’s application, and with no specific development project information being provided, the question of “who benefits” becomes very gray. Consequently, the question of “who benefits” must be replaced by “who *eventually will benefit*”?

Considering the question “who eventually will benefit”; logic directs that question be directed first towards adjacent land owners for further study and research.

**Next Input:**

In further studying the land(s) contained with the 329.4 acres of “Prime” farm land one finds there to be either (3) or (4) parcels of land.

4-2

One parcel contains acreage managed on behalf of the American Taxpayers by the Department of Natural Resources. This parcel is known as a “School Trust parcel”.

(2) or (3) other parcels are owned, as defined by the terms of either one or two different trusts, by members of the Angell family.

I say there are (2) or (3) other parcels in the Angell family name as I found that by checking on their ownership (related to the "north properties" parcels) via the Walla Walla County Assessor's online "property records search", if one accesses this information from a personal home computer, the "property records search" site indicates there are (3) parcels (listed below) showing under the Angell name.

However, if one goes into the Walla Walla County Assessor's office directly and asks them to look up the same information, (the Angell family parcels contained within the "north properties" group) their information shows there are only (2) parcels listed and the last time I checked there was an indicator showing the Angell parcels at this location had recently been adjusted.

4-2

So, what does this mean? For an application by the City of Walla Walla to be complete doesn't the information regarding property parcel numbers have to be accurate, compatible and fully up-to-date?

42733

ANGELL JAMES L AND JAMES L & MARY ANGELL LIFE ESTATE & AMANDA ANGELL

Land Use Code 83

Legal Description: 16-7-36 TAX 29

Parcel Number: 360716120018

5537

ANGELL RESIDUARY CREDIT SHELTER TRUST

Land Use Code 81

Legal Description: 16-7-36 TAX 30 LESS CO RD

Parcel Number: 360716110019

42734

ANGELL JAMES L AND JAMES L & MARY ANGELL LIFE ESTATE & AMANDA ANGELL

Land Use Code 83

Legal Description: 16-7-36 TAX 31

Parcel Number: 360716120020

**Next input:**

It makes absolutely no sense for the city of Walla Walla to include the “School Trust Land parcel” in their UGA plans as stated.

5540

DNR

Land Use Code 67

Legal Description: 16-7-36 NW1/4

Parcel Number: 360716210001

4-3

**The School Trust Land concept dates back to 1889 in Washington State.**

*Federally granted state trust lands support seven specific trusts, each with its own lands:*

*\*Common School trust – supports construction of public kindergarten through 12th -grade public schools statewide*

*\*University trust – supports University of Washington*

*\*Normal School trust – supports 4 state universities (Western, Central, and Eastern Washington – former teacher colleges, and The Evergreen State College)*

*\*Agricultural School trust – supports Washington State University*

*\*Scientific School trust – also supports Washington State University*

*\*Capitol Building trust – supports state buildings at the Capitol in Olympia*

*\*Charitable, Educational, Penal and Reformatory Institutions (CEP&RI) trust – supports institutions managed by the state Departments of Corrections and Social and Health Services*

I want to focus on one of the seven points listed above, "Common School trust".

Growth is inevitable (*eventually*) and with growth comes the need for more schools. Why on earth would the City of Walla Walla attempt to encourage the use of a pre-existing "School Trust Land parcel" for a "mixed-use development" project as is suggested in their application?

4-3

The "School Trust Land parcel" should be left intact under the auspices of the DNR and left in agricultural production (income producing) until such time it is needed for a future school site north of Highway 12 or at such time it is needed for a protected Green Space/Park/Conservation Reserve should reasonable access by farm machinery to the property be limited by non-agricultural development of the surrounding privately-owned properties.

If the City of Walla Walla chooses not to help protect this parcel for school income or future school use then they should look very closely at what has to take place should they seek to assist in its becoming "commercially developable".

By the very definition of "Prime" agricultural land – which the "School Trust Land parcel" and the adjacent Angell family property parcels are (PA-40), conversion of

the “Best of the Best” (premium soil producing the highest of yields) is not something one does simply because one wants to.

No, to apply to take “Prime” agricultural land (Primary Agricultural/PA) out of production or potential production, one must approach such a request along the lines of a fiduciary responsibility. The application has to conform with higher standards than a normal land zoning change application.

4-3

**Next Input:**

Referring back to this as shared in the opening of this letter:

*“The lead agency has identified the following areas for discussion in the EIS: earth, water and natural resources, plants and animals, relationship to plans, policies and regulations, **transportation and traffic**, and public services and utilities.”*

I have highlighted “transportation and traffic’ for a very important reason.

In the City of Walla Walla’s application to the County of Walla Walla, requesting the county approve the removal of specific county lands from full oversight of the county and placing those specific county lands within the city’s oversight UGA zone, the city states the following regarding the “north properties”:

4-4

*“The existing and future development in this area has already led to Washington State Department of Transportation (WSDOT) changing the configuration of the intersection at Lower Waitsburg Road/Clinton and Highway 12 and WSDOT is planning for further changes to Highway 12/Clinton Intersection without considering the proposed addition to the UGA.”*

Hold on a minute!

Since December of 2014 I have been a participant in multiple development applications (of varying types and formats) located directly adjacent to the aforementioned Lower Waitsburg Road/Clinton and Highway 12 intersection; specifically, the Wenham, Evans, Bouchon Park Phase 1, Bouchon Park Phase 2 as well as (2) development applications (McDonald and the subsequent Hayden Homes ownership plat plan amendments) very nearby (approximately 2600' east on Middle Waitsburg Road).

When the City of Walla Walla states "*WSDOT is planning for further changes to Highway 12/Clinton intersection without considering the proposed addition to the UGA*" a great deal of pertinent reference/background material is missing.

At the time(s) of the (2) separate applications to develop submitted by the owner/developer of Bouchon Park, there were no WSDOT plans "in place" for changes to the Lower Waitsburg Road/Clinton and Highway 12 intersection. It has been known for many years that the intersection was in need of an overpass/underpass and that the intersection was dangerous, however there was no direct relationship in place between "need" and "real-time planning".

4-4

Subsequent to the first Bouchon Park application for development (Phase 1), **and subsequent** to the City of Walla Walla's recommendation to approve (per Development Services) that application, WSDOT issued a formal response (on file with Development Services) stating that Bouchon Park (Phase 1) would not receive its final permits for operation until the Bouchon Park owner/developer had paid for *specific Bouchon Park related* updates to the Lower Waitsburg Road/Clinton and Highway 12 intersection as defined by and installed by WSDOT.

In fact, since the City of Walla Walla had recommended to approve the Bouchon Park permit (without any significant upgrades to the Lower Waitsburg Road/Clinton/Highway 12 intersection) prior to receiving the WSDOT letter, the

City of Walla Walla had to go back and amend their approval of the Bouchon Park application to include and require what WSDOT required.

**Furthermore**, WSDOT specified that at such time a Bouchon Park Phase 2 development was built, *there would be further additional changes* to the Lower Waitsburg Road/Clinton and Highway 12 intersection and again these WSDOT defined changes would be paid for by the Bouchon Park owner/developer.

So, for the City of Walla Walla to officially state *“WSDOT is planning for further changes to Highway 12/Clinton Intersection without considering the proposed addition to the UGA”* – as I read it – is to imply that the “further changes” planned by WSDOT would serve “future development” (which could mean future development on property defined by an “expanded” UGA).

Nothing could be farther from the truth!

4-4

The “WSDOT planned further changes to Highway 12/Clinton Intersection” are specifically based on the official Traffic Study submitted for the Bouchon Park Phase 1 and Phase 2 development applications.

When the City of Walla Walla states *“without considering the proposed addition to the UGA”*, I read that to say the City of Walla Walla is stating that WSDOT is thinking ahead (traffic handling wise) for future yet-to-be-proposed development.

No.

Those “planned needs” are not based on serving any development **not yet on the books** pertaining to nearby properties regardless of whether they are inside the



existing UGA boundary north of Highway 12 and served by Lower Waitsburg Road and Middle Waitsburg Road or outside of that existing UGA boundary.

The “planned needs” as defined by WSDOT for that location pertain directly to the Phase 1 and Phase 2 permits related to the Bouchon Park development and that is all. Period.

The City of Walla Walla, in their UGA application to Walla Walla County goes on to state:

*“The City’s Transportation Plan, which is being overhauled as part of this major update, has identified US Highway 12/Clinton intersection as an improvement project.”*

4-4

Wait a minute!

That official statement, as inserted into this application, makes it sound like the City of Walla Walla has taken a lead position in upgrading the US Highway 12/Clinton Intersection.

Nothing could be further from reality.

While that intersection has long been acknowledged as being under-designed and over-worked, and WSDOT has preliminary plans for an overpass at that location, those plans, prior to the Bouchon Park Phase 1 and Phase 2 applications, were simply plans for “sometime in the future” with no priority or funding attached to it whatsoever.

Thanks to (former) County Commissioner Perry Dozier; at first sight of the scale of the Bouchon Park Phase 1 initial site grading (when giant equipment was delivered onsite for that purpose) in early November of 2105, he went to the Port of Walla Walla and thanks to the Port's relationship with WSDOT, the County and the Port took the first "real time" steps that ultimately shifted the possibility of an overpass at that intersection from "sometime in the future" to a "legislative priority".

4-4

Please note that the City of Walla Walla was "late to the game", (their words as mentioned in the Union-Bulletin subsequent to the County and Port's significant homework) vis-à-vis the importance of actually going forward with safety design upgrades to that intersection.

**Next Input:**

Now as to "affordable housing development" (per the City of Walla Walla's application):

*"Exhibit B delves into the city's argument for why this area should be added to the UGA and more deeply, but the main arguments can be summarized as: low cost of providing urban utilities, services, and transportation, allowing for affordable housing development, proximity to urban centers, proximity to increased development pressures, and a large County-wide supply of agricultural resource lands which are not immediately adjacent to UGA boundaries."*

4-5

This UGA application does not relate to affordable housing development whatsoever. Hayden homes – known for building homes in the "more affordable" range is currently developing Blue Mountain Estates – directly adjacent to School Trust Land parcel and the Angell properties. Yet...the new Hayden homes at this location currently are priced between \$325,126 (MLS # 117779) and \$362,264 (MLS# 117770).

If one considers that Hayden Homes builds new homes in the “lower price ranges” yet their properties adjacent to the “north properties” are currently listed between \$325k and \$363K...logic dictates if more new urban sized lots are developed in subsequent new subdivisions within the proposed adjacent UGA expansion, those homes, being built on the best-of-the-best Prime Agricultural land(s) - with world class mountain views thanks to the fact that there are no preexisting structures to block views - and nearby expanding world class vineyards, those homes would NOT be priced under \$400k.

If the lands within the proposed UGA addition were to be developed in the near future, it’s guaranteed that any developer with a financial brain is going to build homes based on *location-location-location* and *view-view-view*. New homes built in that location would most assuredly not be priced in the low-to-mid \$200,000 range (which by all local statistical accounts is where the current local “median” home price exists).

4-5

A recent real estate article in the Union-Bulletin included information from the local real estate community indicating that homes in the \$200k range and under were snapped up immediately (suggesting what would be considered affordable in this area) while homes in the \$400k range and up tend to “sit on the market” for a while.

I recommend the City of Walla Walla refrain from expanding their UGA unnecessarily northward at this time and focus on supporting the development of and/or the repurposing of properties already contained within the existing City Limits and existing UGA.

RL McFarland

3731 Middle Waitsburg Road, Walla Walla, WA 99362

Comment 5 – Steven Pao

Elizabeth Chamberlain  
City of Walla Walla  
Development Services Department  
55 E. Moore St.  
Walla Walla, WA. 99362

January 3, 2018

RECEIVED  
JAN 04 2018

Steven Pao  
334 Woodland Ave.  
Walla Walla, WA. 99362  
(509) 529-3471

Letter 5

Dear Ms. Chamberlain.

This letter is in regard to the City of Walla Walla's Comprehensive Plan update. It was stated that the city plans to rezone the current residentially zoned housing (primarily in the 300-500 block area) of Woodland Ave. to industrial. My concern for this proposed rezone is the cities' noise ordinance.


Currently the maximum noise allowed from an industrial zone to a residential zone is 60 db. However, the maximum noise allowed from an industrial zone to another industrial zone is 70 db. A ten decibel increase in sound is significant. I am concerned that this would then allow an industrial facility to emit more noise to the local houses that the homeowners would then have to endure without any recourse.

We have had problems in the past in an identical matter where Snow Distribution on Abadie St. (zoned industrial or commercial) would have as many as twelve diesel refrigeration units running all night which exceeded the residential noise limits. The nearby Walla Walla Foundry often operates two shifts, starting at 5:00 a.m. and operating until 10:00 p.m., and is often noisy. Especially with the operation of exhaust fans, (which whine like jet engines) sometimes 24 hours a day. (I am not formally complaining about the foundry, just pointing out facts. We, so far, have had a good relationship with the foundry.)

If the city proceeds with the rezoning of the residential housing to industrial, what guarantees would be in place to protect the homeowners from additional noise?

Thank you for your time in addressing my concerns in this matter.

Sincerely,



Steven Pao

5-1

**Exhibit 2-1 Responses to Comments**

<b>Comment Number</b>	<b>Response</b>
<b>Confederated Tribes of the Umatilla Indian Reservation</b>	
1-1	Comment is noted. The Walla Walla 2040 plan carried forward the goals and policies from the 2008 Walla Walla Urban Area Comprehensive Plan identified in the CTUIR letter. Goal 1 states that “Water, air, and soil resources are protected in Walla Walla” and ENR Policy 1.7 address this comment.
1-2	ENR Policy 1.10 states “Develop a Mill Creek Corridor Plan with a focus on the opportunity to “daylight” Mill Creek through the downtown.” City will add an implementation item to the Environment and Natural Resources Element to address a Mill Creek Corridor Plan. Comment addressed.
1-3	Comment noted. The City’s Shoreline Management Plan (SMP), recently updated in 2016 pursuant to the Shoreline Management Act (SMA), regulates land within 200 feet of Mill Creek which acts similar to an overlay district along Mill Creek within the city limits. The City’s SMP address development within 200 feet of Mill Creek.
1-4	Comment noted. The City’s SMP was recently updated in 2016 pursuant to the SMA. Streams were analyzed to determine if they fell within the threshold of shoreline jurisdiction (see the Shoreline Analysis Report for Shorelines in Walla Walla County and the Cities of Walla Walla, Prescott, and Waitsburg, dated September 2014). For the City of Walla Walla, Mill Creek is considered a shoreline of the state. Yellowhawk Creek within the city limits did not meet the cfs threshold for shoreline jurisdiction.  The SMP calls for a 35 feet buffer from Mill Creek with an additional five foot building setback from the buffer for a total of 40 feet. Comments were addressed through the City’s SMP update effort.
1-5	Comment noted. The City of Walla Walla’s Critical Areas Ordinance (CAO) governs development when critical areas and buffers are present on properties.
1-6	Comment noted. The City’s CAO was developed with Best Available Science in 2008. When the City updated its SMP, a review of the CAO was conducted and applicable amendments made to address any changes in state law. The City also conducted a review of the CAO as part of the periodic update and incorporated the CAO amendments from the SMP update process to apply city-wide.
1-7	Comment noted. Policy H-2.2 addresses property maintenance standards, although more specific to housing, could apply to other structures. Under the implementation action table, the City has identified the need to develop minimum property maintenance standards and code compliance program.
1-8	Comments noted. Critical areas have been addressed under comments 1-5 and 1-6. The comprehensive plan includes policies to support trail development along the Mill Creek Corridor. See PR Policy 1.6. City will add another policy regarding the Blue Mountain Region Trails Plan.
<b>Department of Archaeology and Historic Preservation</b>	
2-1	The plan has been amended to include historic preservation in LU Policy 1.4 as well as making sure the Policy Connection paragraphs in the other elements reference Historic Preservation where appropriate.
<b>Washington State Department of Transportation - February 1, 2018 Letter</b>	
3-1	Analysis of US Highway 12 and State Route 125 are referenced in the City’s Transportation Plan. The City utilized information from the Walla Walla Valley Metropolitan Planning Organization 2040 plan for these facilities including traffic counts.

3-2	Comment noted. The Walla Walla 2040 Plan includes a transportation element meeting the requirements of RCW 30.70A. When WSDOT provided their comment letter on February 1, 2018 the draft transportation plan had not been completed.
3-3	The City’s proposed North Urban Growth Area (UGA) Addition application to Walla Walla County was not moved forward to the County’s final docket. The City has identified the North UGA as a future study area and is not included in the City’s UGA.
3-4	The draft EIS looked at the potential increase in commercial and residential development within the Myra Road corridor. The analysis showed that the City’s transportation network did not drop below a Level of Service standard “D” within the 20-year planning horizon.
<b>Washington State Department of Transportation - March 30, 2018 Letter</b>	
3A-1	Comment noted.
<b>RL McFarland Comment Letter</b>	
4-1	The City of Walla Walla completed a land capacity analysis that has been incorporated into the comprehensive plan update. Applying for the North UGA addition to Walla Walla County is related to a corresponding application the City submitted to Walla Walla County for removal of 198 acres from the UGA. However, Walla Walla County did not move forward the North UGA addition application to the final docket. Therefore this comment is no longer applicable.
4-2	Comment noted. Property ownership was obtained from the Parcel Records the City receives from Walla Walla County.
4-3	Comment noted.
4-4	<p>Comment noted. The City’s North UGA addition application was not moved forward to Walla Walla County’s final docket. Therefore, the City has revised its draft comprehensive plan to show the North UGA as a future study area.</p> <p>The comments provided regarding “Bouchon Park” are not applicable to the draft comprehensive plan as “Bouchon Park” is an approved site development project in compliance with the City’s development standards (Phase 1 approved June 1, 2015 and Phase 2 approved February 16, 2016). The transportation mitigation identified in the City’s issued Mitigated Determination of Non-Significance (May 22, 2015) for Phase 1 and Phase 2 issued January 19, 2016 for the project was a result of the comments provided by the Washington State Department of Transportation to the City as part of Notice of Application comment period.</p> <p>In regards to US 12 and the interchanges along the corridor, the City has identified in its draft transportation plan the need for a interchange corridor study along US 12 from the interchange at 2<sup>nd</sup> Avenue to the interchange at Wilbur Avenue.</p>
4-5	Comment noted.
<b>Steven Pao Comment Letter</b>	
5-1	The City’s noise ordinance addresses noise impacts for non-residential zoned property when the receiving property is residential. See Walla Walla Municipal Code (WWMC) Chapter 8.13. Mr. Pao has also applied for a land use change of his property from Residential to Industrial. If approved, would permit Mr. Pao to apply for a potential rezone to Industrial and therefore could allow higher intensity uses on his own property similar to the request Mr. Pao is concerned about according to his comment letter.