



Shoreline Fire Department
Dedicated to the Protection of Life and Property

Scott Keeny
Jon Kennison
Jim Fisher
Commissioners
Marcus Kragness
Fire Chief

March 2, 2009

Craig R. Ladiser, Director
Snohomish County Planning and Development Services
M/S #604
3000 Rockefeller Avenue
Everett, WA 98021-4201

RE: Comprehensive Plan Amendment and Rezone
Draft Supplemental Environmental Impact Statement
Point Wells Property, Docket XIII

Dear Mr. Ladiser:

Snohomish County is currently considering a Comprehensive Plan Amendment and rezone request that would change the current land use designation at Point Wells from Urban Industrial to Mixed Use/Urban Center and the current zoning from Heavy Industrial to Planned Community Business. As indicated in the Point Wells Draft SEIS, adopting these land use changes could result in a population of up to 6,440 residents and 85,000 square feet of commercial and retail space.

Although Point Wells is outside the boundaries of the Shoreline Fire Department, the Department has provided fire and emergency medical services to Point Wells through a service contract with the owner for over 30 years, since there are no other fire services available or nearby. Shoreline response to Point Wells is provided by the nearby Station 64, located approximately 2.25 miles from the site. The station is staffed with one lieutenant, four firefighter/emergency medical technicians, and two firefighter/paramedics. The station is equipped with one pumper engine, one basic life support vehicle, and one advanced life support vehicle. The staffing, equipment, and proximity to Point Wells has guaranteed an outstanding level of fire and emergency medical response to the Paramount site over the years. However, this service has been provided based on the current industrial use as an asphalt receiving and distribution facility. If the proposed Comprehensive Plan and land uses changes are adopted by Snohomish County, the Shoreline Fire Department will no longer provide first response fire and emergency medical services to the Point Wells area.

The Shoreline Fire Department (King County Fire District 4) is annexed to the City of Shoreline and therefore the City is the legal authority responsible for the adoption and enforcement of all building and fire codes. Over the years, the Department has worked closely with the City to ensure that we have adequate codes, enforcement and public education including but not limited to:

- Sprinkler Ordinances
- Fire flow, hydrant and storage requirements for new development

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- Emergency access and turn around standards
- Hazardous material codes and inspection
- Building plans review
- Fire inspections
- Fire prevention standards and education
- Arson investigation protocols
- Emergency and disaster management plans, training, drills and procedures
- Combined Emergency Operations Center
- Communications interoperability with Shoreline Police, Public Works, and Community Response Team
- Traffic and fire scene control
- Public education and training for natural and man made disasters.

It is simply not practical, feasible or even advisable to recreate the duplicative legal, code and service provisions with Snohomish County that would be necessary for the Shoreline Fire Department to provide an adequate level of professional fire prevention, fire response and emergency medical service required by a highly developed Point Wells.

The draft SEIS does not adequately address how these crucial emergency services will be provided. In Section 3.12 the report simply indicates that the service should be provided by a Snohomish County rural fire district or the Shoreline Fire Department. The draft glaringly omits that there are no nearby rural fire districts that could possibly supply these services with any reasonable response times. This would leave the residents, visitors, and businesses at Point Wells with inadequate and seriously deficient fire and emergency medical services. It is well established that minutes and even seconds are crucial in quelling fires and providing life saving emergency medical services.

Due to the geographic isolation and extremely limited access to Point Wells from the rest of Snohomish County, there are no feasible and practical alternatives to provide critical fire and emergency medical services to the over 6,000 residents, businesses, and visitors projected for Point Wells. The response times to Point Wells from emergency responders in Snohomish County, under any reasonable professional standards or interpretation of the Growth Management Act, cannot be considered as "adequate public services or facilities" which could be "provided in an efficient manner." The Growth Management Act provides in part (RCW 36.70A.020): "(1) Urban Growth. Encourage development in urban areas where adequate public facilities or services exist or can be provided in an efficient manner." There are a number of other State and Snohomish County policies that prohibit dense urban development without the provision of adequate public services, such as:

- *Snohomish County General Policy Plan, Land Use Policy 3.a.6:* Desired growth in Urban Centers shall be accomplished through...provision of necessary services and public facilities including transit, sewer, water, storm water, roads, and pedestrian improvements.
- *Snohomish County General Policy Plan Goal CF 9:* Coordinate with non-county facility providers such as cities and special purpose districts to support the future land use pattern indicated by this plan.

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- *Snohomish Countywide Planning Policy UG-1:* Establish Urban Growth Areas which ... (c) can be supported by an urban level of service consistent with capital facilities plans for public facilities and utilities;
- *Snohomish Countywide Planning Policy OD-1:* Promote development within urban growth areas in order to use land efficiently, add certainty to capital facilities planning, and allow timely and coordinated extension of urban services and utilities for new development.
- Identify 6-year growth areas geographically within each UGA or establish policies which direct growth consistent with the land use and capital facilities element to meet state law. In particular RCW 36.70A.110 (3) states that "urban growth should be located first in areas already characterized by urban growth that have existing public facility and service capacities to serve such development, and second in areas already characterized by growth that will be served by a combination of both existing facilities and services and any additional needed public facilities and services that are provided by either public or private sources. Further it is appropriate that urban government services be provided by cities...
- *Snohomish Countywide Planning Policy OD-2 b:* Allow development within the incorporated and unincorporated portions of the UGA as follows: The county will regulate development within the unincorporated portions of urban growth areas in a manner that does not preclude urban densities... Strategies will consider the unique development opportunities and constraints in each urban growth area and could range from development limitations in one area to the authorization of development at planned urban densities in those areas that have urban governmental services and capital facilities available.

Prompt and sufficient fire and life safety services are among the primary and vital duties of local governments, and planning for dramatically increased development intensities must take this into account. Since the provision of these critical life safety services cannot be provided to Point Wells by Snohomish County and cannot be reasonably provided by other agencies in Snohomish County, we strongly recommend that the requested amendment be denied.

Sincerely,



Marcus Kragness, Fire Chief
Shoreline Fire Department

cc: Robert Olander, City Manager
City of Shoreline