

Discussion: The *Proposed Action* is consistent with this policy. The *Proposed Action* calls for a major developer's LID project to finance the realignment of Ruston Way around the existing tunnel, construction of bike lanes, and sidewalk improvements.

WE-4.1 Bicycle Route Improvements & WE-4.2 Ruston/Jane Clark Pedestrian Improvements

Support bicycle improvements (e.g., lanes, striping, signage) along routes designated for travel especially along arterial streets (e.g., 6th Avenue, Orchard Street, Pearl Street, Narrows Drive). Also support completion of the Scott Pierson Trail located along State Route 16; Develop sidewalks, bicycle lanes, curb cuts and other street-related improvements to enhance pedestrian safety and circulation in this older neighborhood especially along streets such as Orchard, Baltimore, Ferdinand and North 46th Streets.

Discussion: The *Proposed Action* is consistent with this policy. The *Proposed Action* calls for the construction and improvement of bike lanes and sidewalks along the road improvements associated with the project.

WE-5 Beautification and Safety

Improve the beauty, safety and security by supporting clean up activities, safety and other improvements that enhance both residential neighborhoods and commercial business districts.

Policy Intent – *The West End area reflects a relatively new commercial and residential district with a variety of needs related to public health, safety and aesthetics.*

Discussion: The *Proposed Action* is consistent with this policy. The *Proposed Action* calls for the construction and improvement of bike lanes and sidewalks along the road improvements associated with the project.

WE-5.1 Public Rights-Of-Way (ROW) Improvements

Encourage the use of native plants and trees in the landscaping of public rights-of-way and open space areas and by private property owners especially along more visual arterial streets such as the west side of Mildred Street from 6th Avenue to South 12th Street.

Discussion: The *Proposed Action* is consistent with this policy. The *Proposed Action* calls major planting of native species to occur within the roundabouts as well as along planter within the development.

WE-5.3 View Corridor Protection

Provide regulatory support to protect residential mountain and water views from blockage by unattractive utility lines, cell towers and other potential impediments.

Discussion: The *Proposed Action* is consistent with this policy. The *Proposed Action* calls for major planting of native species to occur within the roundabouts as well as along planter within the development.

WE-6 Utilities and Services

Develop and maintain a full complement of public and private utility services including electrical power, water service, natural gas, storm and sanitary sewers, refuse collection, street cleaning and telecommunications.

Discussion: The *Proposed Action* is consistent with this policy. The *Proposed Action* would include all above referenced utilities.

WE-6.1 Underground Utilities

Support LID and other financial tools to underground overhead utilities especially in areas targeted for development such as the mixed-use centers.

Discussion: The *Proposed Action* is consistent with this policy. All utilities within the *Proposed Action* site are proposed to be underground.

WE-7.3 Site Views/Minimize View Blockage

Development within potential view areas should utilize various building designs, site layouts, street arrangements and orientation to maximize and protect view potentials and minimize view blockage of adjacent sites.

Discussion: The *Proposed Action* is consistent with this policy. *Point Ruston* maintains a layout intended to promote views from on and off site. The streets are aligned to create view corridors extending from Ruston Way to Commencement Bay.

3.1.3.2.2 City of Tacoma Ruston Way Plan¹¹

Summary: *The Ruston Way Plan is an element of the City's long-range comprehensive Land Use Management Plan and the City's Master Plan for Shoreline Development. The Ruston Way Plan reaffirms the City's intent for "mixed public and private" development along this corridor and provides recommendations for improvements (e.g., access, appearance, regulatory changes, design, etc.) to this waterfront area.*

The upland portion of Point Ruston is located north of the extent that is addressed in the Ruston Way Plan. Tract 'A,' however, is designated as Area 3 -- "Other Public Areas" in the Plan. Recreational activities proposed in the Plan for this area include "beach enhancement and small boat access and viewing opportunities."

Discussion: *Point Ruston* would be consistent with major elements of this Plan. As noted with regard to the discussion of Open Space (2.5.2.6), Roadways, Access (2.4.2.7) and Project Design and Architecture (2.5.2.8) and as shown in Figure 10, the project proposes extensive pedestrian linkages between the Ruston Way esplanade and the project site. A key element is the proposed 100-foot wide (average width) promenade, which will provide public, on-site access to the water that presently does not exist. The applicant indicates that *Point Ruston* would prepare and adopt design guidelines and architectural covenants to establish and maintain a consistent architectural theme for the entire complex consistent with the *Ruston way Plan*.

3.1.3.2.3 Town of Ruston Comprehensive Plan

Summary: *In 1994, the Town of Ruston adopted a Comprehensive Plan consistent with the provisions of the Growth Management Act. That Plan identified the ASARCO site as a mixed-use, Master Planned Development.*

¹¹ Resolution 27024 of June 30, 1981

Discussion: The proposed mixed-use *Point Ruston* development is consistent with the intent and uses of the MPD zone as indicated in the Town's Comprehensive Plan.

3.1.3.3 City of Tacoma and Town of Ruston Shoreline Management Plans

3.1.3.3.1 City of Tacoma Master Program for Shoreline Development

Summary: *The City's Master Program for Shoreline Development is an element of the City's long range Land Use Management Plan. The Master Plan was adopted in 1975 and updated several times since then, most recently in 1996. The Master Plan includes goals, policies and development regulations for all shoreline areas within the City.*

In 2003, the Department of Ecology issued new guidelines regarding shoreline master programs. These outline procedural steps, as well as substantive requirements that must be met. The City of Tacoma is in the process of updating the Master Plan to be consistent with DOE's guidelines. This update involves evaluating all shoreline policies, designations and regulations and must be based upon scientific and technical information to assure no "net loss of shoreline ecological functions" while providing for appropriate uses within shoreline areas. It is anticipated that the City's Planning Commission will submit their recommendation to the City Council in Spring 2008.

The City's Master Plan regulates land and shoreline use in the shoreline planning areas through the current Shoreline Master Program, which is codified in Chapter 13.10 of the Tacoma Municipal Code. The City's shoreline areas are divided into Shoreline districts and these function similar to zoning designations. Each district has a specified intent or policy basis for desired uses in that area, as well as development standards and use regulations. Each district is assigned a shoreline environment designation, supporting the overall goal for the district. Finally, zoning designations (TMC, Chapter 13.06) are applied to the shoreline districts and adjacent upland areas.

The Point Ruston site is located within the City's S-6 Ruston Way Shoreline District, which has an Environmental Designation of "Urban." The Urban designation is intended to "ensure optimum utilization of shoreline within urbanized shoreline areas." The overall intent of this district is to encourage development of a coordinated plan of mixed public and private water-oriented use activities, including commercial, recreational, as well as residential uses. The Master Plan notes that preference should be given to "creating an activity center within the area 150 feet landward of the OHWM.

Within the S-6 Shoreline district, public access to the shoreline is required, with a minimum of 15-foot wide unobstructed pedestrian access. Commercial, water-related and water-enjoyment are allowed in the upland portion of sites within this District, as are residential uses, which are allowed beyond 150 feet from the OHWM. Also within this district, proposed buildings are limited to a height of 35 feet within 100 feet of Ordinary High Water Mark (OHWM), a height of 50 feet between 100 - 200 feet of the OHWM, and a height of 80 feet beyond 200 feet of OHWM.

Discussion: The proposed mixed-use *Point Ruston* development is consistent with the intent and uses for the S-6 Ruston Way Shoreline District, as well as the development standards. Specific details of the *Proposed Action* are outlined in **Section II** of this FSEIS.

3.1.3.3.2 Town of Ruston Shoreline Management Plan

Summary: The Town of Ruston's SMP was adopted in 1974 as Ord. 651. That portion of the project site is within Ruston's shoreline district is designated as an Urban Environment. The town's entire 440 lineal feet on Commencement Bay are located within the boundaries of the former ASARCO facility. The general goal of the SMP was "to cooperate with the American Smelting and Refining Company in the overall management and/or development of the shoreline." It was contemplated within the MDP that the Town of Ruston Shoreline Management Plan would be updated to conform to future redevelopment of the ASARCO site.

Discussion: To accommodate the Proposed Action the Town's Shoreline Management Plan will need to be revised, or a conditional use permit may be required from the Town with approval by the Department of Ecology.

3.1.3.4 City of Tacoma and Town of Ruston Development Regulations

3.1.3.4.1 City of Tacoma Land Use Regulatory Code

Summary: Title 13 of the Tacoma Municipal Code regulates Land Use within the City in terms of uses allowed within various zoning districts and the development standards that are applied to such uses. The Point Ruston site is within the area that is designated as the S-6 Ruston Way Shoreline district (discussed above). Development standards include:

- **Minimum Lot Area:** Multi-family – 6,000 sq. ft. Residential, – 5,000 sq. ft.
- **Minimum Lot Width:** 50 ft.
- **Building Setbacks:** Front – 20 ft.; Side – 30% of the Shoreline Frontage (minimum 5 ft.); Rear – 20 ft.; Street Frontage – 25 ft.
- **Maximum Building Height:** 35 ft. within 100 ft. of the OHWM; 50 ft. between 100 and 200 ft. of the OHWM; and 80 ft. beyond 200 ft. from the OHWM

Discussion: The proposed Point Ruston development has been designed to comply with use and development standards as noted above.

3.1.3.4.2 Town of Ruston Zoning Code

Summary: The Town of Ruston has designated the Point Ruston project site as part of the City's Master Planned Development (MPD) zone. All development within this zone may be developed only in accordance with a development plan that is approved by the Town of Ruston. The plan notes that when residential uses are proposed the development plan shall contain approximate number of dwelling units, the bulk and scale of such structures, open space, landscaping, street and land improvements, etc. Similarly, when commercial uses are proposed, the development plan must include the approximate retail sales area, the bulk and scale of such structures, open space, landscaping, street and land improvements, parking, and nuisance controls.

Discussion: The *Proposed Action* would be consistent with the Town's Comprehensive Plan, and at the time of specific application each proposal would be consistent with the underlying land use regulations of the Town.

3.1.3.4.3 Town of Ruston – ASARCO Master Development Plan

Summary: The Town of Ruston adopted the Master Development Plan (MDP), by Ordinance 1002, with modifications contained in an Addendum (A), in 1997.¹² The Town recognizes the MDP as a development regulation that provides detailed, long range planning direction for redevelopment of the former ASARCO site in terms of the site plan, infrastructure, parks and open space and development. The MDP was adopted to help “guide future land use and regulatory amendments and interlocal agreements” (Ord. 1002). It identifies encouraged, allowed and conditional uses for all areas of the site.¹³ These uses include: commercial (e.g., office and professional business, research and development, financial services, business services, personal services, food and beverage, hotel and hospitality, and health care). Residential uses were noted as conditional, upon approval by ASARCO in Section D 1.6.5 of the Master Development Plan¹⁴. Point Ruston LLC received approval from ASARCO for the residential uses that are proposed as part of Point Ruston.¹⁵ It should be noted that Table D-1 of Addendum A to Ordinance 1002 contains a chart summarizing these uses and Residential is listed there as “Allowed/Conditional with ASARCO Approval” in certain areas (U-2 and U-3) and “Not Appropriate” in other areas. The MDP further specifies height and bulk limitations for the development site. The height limit is 60 feet above the minimum floor elevation and the Floor Area Ratio (FAR)¹⁶ is 0.75¹⁷.

Discussion:

In addition to other points of which this is representative, there is currently disagreement between the Town of Ruston and the proponent as to whether residential uses are currently allowed within the portion of the project within the Town. The Town indicates that Table D-1 in Addendum A to Ordinance 1002 supercedes the text of the *Master Development Plan* and that residential uses must therefore be considered “not appropriate” under existing code. The Proponent has noted that the specific modifications made to the *Master Development Plan* by Ordinance 1002 are set forth in the body of Addendum A and that the text of D.1.6.5 identifying residential uses as conditional on ASARCO’s approval was not modified. The proponent has also noted that Resolution 333 has since indicated the Town’s support of residential uses as appropriate for this property. The consistency of the use with the zoning code and comprehensive plan would need to be resolved.

This discussion is provided to acknowledge the issue, differing interpretations and to address several comments made by the Town of Ruston. However, it is neither the intent nor is it within the scope of this FSEIS to analyze and resolve this or similar matters of code interpretation. It

¹² Ordinance No. 1002 of December 8, 1997

¹³ MDP, at D-11

¹⁴ MDP, at D-13

¹⁵ See *Appendix B* of the MDP.

¹⁶ Floor Area Ratio (FAR) is a ratio of the total amount of development that is proposed on a given site to the amount of site area.

¹⁷ MDP, D-7 through D-8; FAR is the total usable floor (excluding parking structures) divided by the total site area.

is the objective of this SEPA document to analyze the impacts of the *proposed action* and alternatives.

Any development or construction would need to be consistent with all applicable land use regulations at the time a specific project application is submitted and would be reviewed for compliance at that time. It is envisioned that additional code and regulatory analysis will be performed by planning staff in making recommendations to decision makers on specific project applications. Where the proposal is determined to be inconsistent with applicable regulations, either the proposal or the regulations must be modified prior to approval of the application.

3.2. AESTHETICS -- VIEWSHED

3.2.1 Affected Environment

The site for the proposal is currently undergoing environmental remediation pursuant to a Consent Decree with the EPA and is now mostly vacant with demolition of the original industrial structures already completed. Views of the site's large open, excavated spaces currently exist to the surrounding land owners, passing vehicles, and pedestrians in the area. Views of the site are available to the residents on the southwest and west of the site because they exist at higher elevations. Views of the site to residents and pedestrians at lower elevations on the southeast and east of the site are impaired by tree/bush dominance.

The numerous industrial structures that existed upon the property in the past have been demolished and removed as a part of the remediation, and temporary mobile construction units and storage sheds are all that presently remain on the property. One small dock remains at the northern end of the site and two larger piers and unused docks exist near the center of the property which can be viewed by residents and passing motorists. Figure 3.2-0 shows the current site and surrounding conditions.

Figure 3.2-1 shows locations around the proposed *Point Ruston* site from where current photos were taken to show current views of the overall site. Views are not currently obstructed on the project site since no buildings presently exist. Temporary stockpiles of soil to be used in remediation/development operations currently exist on the site and block some views from Ruston. Thirteen (13) photos, Figures 3.2-2 through 3.2-14, were taken from around the site at existing and potential residential and open space locations and at various elevations. The photos are intended to provide example of existing conditions from various locations.

Figure 3.2-2 through Figure 3.2-5 shows the site from the west at the Tacoma Yacht Club looking south and eastward toward the City of Tacoma and the Commencement Bay. Figure 3.2-2 shows the site looking southeast from just west of the site at approximately the site's level. The site cannot be seen from this elevation and existing fencing from the Tacoma Yacht Club prevents view. Residences south and southeast of the site on higher elevations are visible from this location. Figure 3.2-3 shows the existing site near the intersection of 54th and Bennett Street at approximately 100 feet above sea level. Port of Tacoma docks, the City of Tacoma, and the Cascade mountain range including Mt. Rainier are evident. Docks and piers that currently appear on the site are evident since there are no structures on the site. Figure 3.2-4 shows the site looking eastward from a homesite located near the intersection of 51st and Bennett Street at approximately 96 feet above sea level. It shows much of the same views as Figure 3.2-3 but less of the onsite containment facility (OCF) where much of the contaminated soil from the ASARCO smelter site was placed. Mount Rainier is not in line of the proposed project from this point. Figure 3.2-5 is taken from Commercial Street at approximately 127 feet above sea level where newer residences exist and views eastward across the excavated area. The existing docks and piers are now seen on the site along with the land on the site.

Figure 3.2-6 through Figure 3.2-9 displays current views of *Point Ruston* viewed from areas south and southwest of the proposed project. Figure 3.2-6 is taken from an elevation approximately 118 feet above the sea level and facing northeast from the lowest elevation of the Point Ruston's residential project "Stack Hill" which is being completed. Open dirt spaces without landscaping, the three docks, water from Commencement Bay and the Sound and background islands are most apparent from these photographs. Figure 3.2-7 is taken from a central location southeast of the site, and it shows the project area from the end of Orchard

Street at approximately 165 feet above sea level in Tacoma. Some existing deciduous trees exist which presently impairs water and island views. Figures 3.2-8 and 3.2-9 are taken from sites for proposed residential developments at approximately 65 feet and 80 feet above sea level. Both show deciduous trees existing in the foreground slightly impairing the views of the Sound.

Figure 3.2-10 through Figure 3.2-12 show the current views of *Point Ruston* site east of the site. Figures 3.2-10 and 3.2-11 are shown from existing residences approximately 150 feet and 200 feet south and east of the site at approximately 50 to 55 feet above sea level. The southeast end of the site is visible from these points through existing trees, native shrubs, and electrical transmission wires at elevation of view. Figure 3.2-12 is taken approximately 700 feet southeast of the site along Ruston Way at the elevation of the site. From this perspective, the site's southeast bulkhead is most apparent and, like places viewed along Ruston Way, little of the actual site's surface can be seen.

Figure 3.2-13 and Figure 3.2-14 show the current views of the Point Ruston site from Ruston Way south from the site. Current views show stockpiled soils, excavation grading areas and placed subgrade completed as part of remediation activities that have occurred over past years. These points are chosen to show potential building sites where corridors will exist. Points that the photos are taken are slightly lower in height than the elevation planned. Presently, from areas along Ruston Way, the site appears as mounds of dirt, but when leveled and Ruston Way is realigned, the site would permit intermittent views of the Sound, Vashon Island and Maury Island along with the existing site's docks and piers.





Figure 3.2-1: View study locations in relation to proposed “POINT RUSTON”

Views from North of Project



Figure 3.2-2: From Tacoma Yacht Club looking toward Mt. Rainier across proposed site.



Figure 3.2-3: From 54th and Bennett St. at street level looking southeast across project site.



Figure 3.2-4: From 51st and Bennett Str. Looking east across project site.



Figure 3.2-5: From Commercial St. near Baltimore looking east across project site

Views from Southwest of Project



Figure 3.2-6: From lower part of “Stack Hill” looking east across project site.



Figure 3.2-7: From undeveloped area on Orchard Street looking northeast across project site.



Figure 3.2-8: From southeast of “Stack Hill” at 80 feet elevation looking east to site.

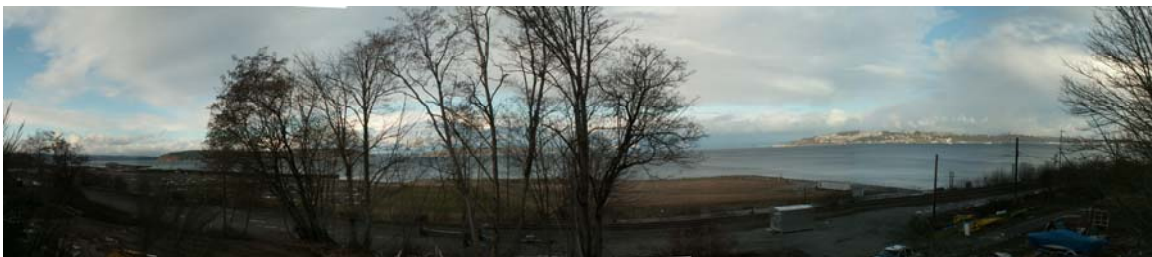


Figure 3.2-9: From southeast of “Stack Hill” at 65 feet elevation looking east to site.

Views from Southeast of Project



Figure 3.2-10: From residence south of site looking north across project site.



Figure 3.2-11: From Residence at Ferdinand looking north across project site.



Figure 3.2-12: From Ruston Way east of site looking northward across proposed site.

Views from Southeast of Project Continued



Figure 3.2-13: From Ruston Way southeast of site looking across proposed site.



Figure 3.2-14: From Ruston Way south of site looking across proposed site.

3.2.2 Significant Impacts of Proposed Action – *Point Ruston* Proposal

Regulatory Requirements – Building Height

As noted previously in this Supplemental EIS with regard to *Land Use*, the portion of the project site that is located within the City of Tacoma is zoned S-6. The height limit in this zoning district is 35 feet within 100 feet of the ordinary high water mark (OHWM), a height of 50 feet between 100 feet and 200 feet of the OHWM, and a height of 80 feet beyond 200 feet from the OHWM. As seen from the proposed site plan, no buildings would be located within 100 feet of the OHWM, portions of structures would be located between 100 feet and 200 feet of the OHWM, and the balance of the proposed *Point Ruston* development would be beyond 200 feet from the OHWM. Portions of buildings that would be within 200 feet of the OHWM would be 50 feet or less in height and buildings beyond 200 feet from the OHWM would be 80 feet or less -- consistent with the designated height requirements of the City of Tacoma regulations.

That portion of the project site that is located within the Town of Ruston is within the area for which the ASARCO Master Plan was adopted. The adopted zone classification, Master Development Plan (MDP) zone specifies a height limit of 60 feet. Buildings of the proposal located within the Town of Ruston will be of varying heights within the designated height requirements. As individual buildings are proposed within the Town of Ruston, builders will have to proceed through the building permit process and any review regulations that exist within their Code insuring compliance.

Most homes with views of the water and surrounding land areas are located directly west of the project site along Commercial Street, Court Street, Bennett Street and Shirley Street. Some of the homes along Shirley Street have limited or no view of the water at the present time. All of the homes with views along these streets are higher than the 80 feet above the site grade as shown on Figure 3.2-15.

A majority of the remaining undeveloped lands at lower elevations are on steep slopes prohibiting development. Those lands that can be developed at lower elevations and that have not yet been developed are examined within this analysis.

Full Build-Out

To obtain an idea of the impact upon existing views that would occur from the proposed development, a comprehensive viewshed analysis was submitted to the City of Tacoma in February, 2007 in the expanded SEPA Environmental Checklist that accompanied the "*Point Ruston*" proposal (**Appendix B** in this document). The analysis within this section addresses the proposal's visual impact from a "full build-out" of *Point Ruston*.



Photosimulations of potential developments on *Point Ruston* are provided for each of the thirteen (13) viewpoints that were selected around the site. A photosimulation consists of a digital photograph from the viewpoint in the direction of the intended viewshed and with proposed development shapes superimposed onto the photo with the use of computer graphics. Each of the viewshed analyses depict views across the site as the site presently exists with the proposed building masses associated with *Point Ruston* superimposed. These simulations show building height, bulk and relative scale but little in the way of project details (e.g., fenestration (glazing/window location), horizontal or vertical modulation, coloration or landscaping). Each of these factors can be important in ultimately determining viewshed-related impacts, but are not considered within this analysis.

The following analysis provides an evaluation of the proposed *Point Ruston* project upon each of the views identified.

Views of Point Ruston Proposal from North of Project

■ **Figure 3.2-16**

- **Viewpoint Location:** Tacoma Yacht Club Parking Lot Looking South (Location 1 shown on Figure 3.2-1)
- **Elevation of the Viewpoint:** 15 ft.
- **Viewshed:** The southward view from this location is of a portion of the covered moorage and stockpiled soils on the breakwater peninsula in the foreground, the project site (undergoing remediation), the hillside in the near distance, and Mount Rainier in the far distance. Water cannot be seen over the site, but views of water will be improved to the east over the breakwater peninsula with new landscaping.
- **View Analysis and Impact:** This viewshed is a southerly view of the project site from an area north of *Point Ruston*. The view depicts buildings at the north-end of the site which would house both commercial and residential activities. The view from this location indicates that the proposed buildings would partially obstruct views of the hillside to the southeast of the site; the view of Mount Rainier or Commencement Bay would be unaffected.

Views in the immediate vicinity would most likely be improved with the landscaping of the site.

■ **Figure 3.2-17**

- **Viewpoint Location:** Bennett St. above the Onsite Containment Facility- OCF (Location 2 shown on Figure 3.2-1)
- **Elevation of the Viewpoint:** 108 ft.



Figure 3.2-16
Location 1: Tacoma Yacht Club Parking Lot
Elevation: 15'
Facing: Southeast

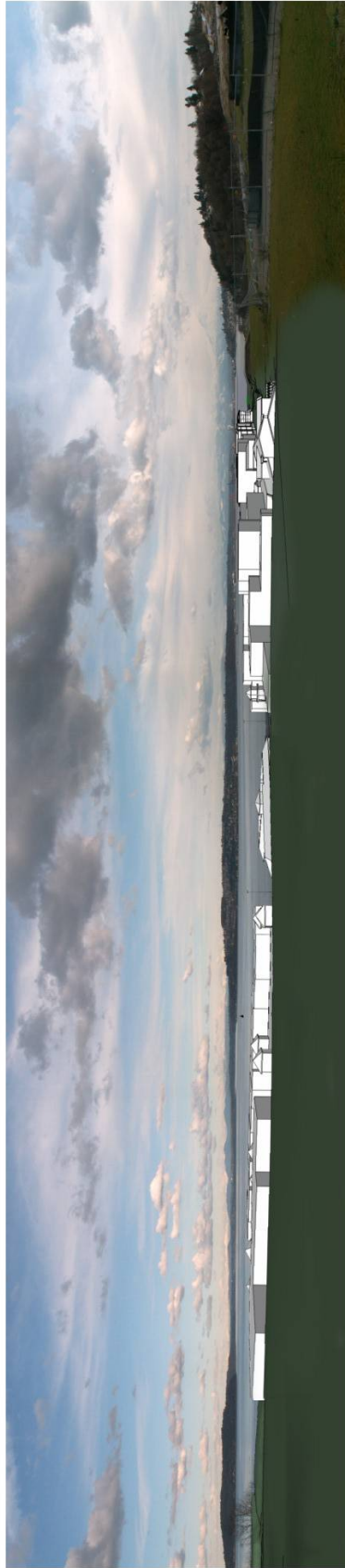


Figure 3.2-17
Location 2: Bennett Street above the OCF
Elevation: 108'
Facing: Southeast

- **Viewshed:** This is a broad view (approx. 120 degrees) across most of the site looking east and southeast. Commencement Bay is in near distance and Browns Point are closest the “*Point Ruston*” site, and the Cascade Mountains and Mount Rainier are seen in the background. The OCF is evident in the foreground from this location.
- **View Analysis and Impact:** This viewshed depicts the anticipated view from Bennett St. looking generally across most of the buildings proposed upon the site. Building rooftops are most evident at this elevation. Many of the buildings observed at this point will exist on Ruston Way and many of the buildings towards the water would not be noticed at this point of view. The structures proposed along Ruston Way include retail and mixed-use (residential, retail/commercial).

The full width of the viewshed impact is shown on figure 3.2-17 illustrating what an observer would experience from this viewpoint. View impacts resulting from the developments would include a preserved view corridor created by buildings with differing elevations.

When looking eastward over the proposed *Point Ruston* structures, buildings built to the maximum would block portions of the near-shoreline views of Commencement Bay and the existing docks and piers, but not affect the views of the Sound or the Islands visible in the distance.

When viewing southeast over the project toward Tacoma, the proposed structures would block a segment of the view of Commencement Bay and in the distance the lower hillside of the Brown’s Point area. Existing views of the mountain ranges and Mount Rainier would be unaffected.

■ Figure 3.2-18

- **Viewpoint Location:** Residence around 51st and Bennett Street (Location 3 shown on Figure 3.2-1)
- **Elevation of the Viewpoint:** Approximately 110 ft.
- **Viewshed:** The view from this viewpoint is similar to the previous view. The views of Commencement Bay and Brown’s Point are prominent as are the Port and the Cascades. Mt. Rainier is not in line with the *Point Ruston* site. Portions of Vashon Island and Maury Island are visible from this point.

View Analysis and Impact: This viewshed is a southerly view of the project site from an area northwest of *Point Ruston*. Again, buildings built to the maximum would block views of some of Commencement Bay to almost Brown’s Point and the near-shoreline existing docks and piers. The views of the mountain ranges and Mount Rainier where seen would be unaffected.



Figure 3.2-18
Location 3: Residence around 51st and Bennett Street
Elevation: Approximately 110'
Facing: Northeast

■ **Figure 3.2-19**

- **Viewpoint Location:** Residence on Commercial Street near Baltimore (Location 4 shown on Figure 3.2-1)
- **Elevation of the Viewpoint:** Approximately 135 feet
- **Viewshed:** The view from this viewpoint is of the Sound, Vashon Island, Maury Island, Commencement Bay and Brown's Point. Olympic Mountains peak over existing residences south of Pt. Defiance. Most of the views of the Sound are looking east and southeast.
- **View Analysis and Impact:** As with other sites in the residential area northwest of the proposed project, homes at this elevation would view the tops of buildings in the proposed project. The structures proposed include various types of uses including retail and mixed-use (residential, retail/commercial). As shown in Figure 3.2-19, the proposed structures would block a portion of the view of Commencement Bay near the shoreline, but will not affect views of Maury Island or the more distant views of Vashon Island and the Kitsap Peninsula. The proposed structures on the southeast of the project would not block the distant lower hillside associated with Browns Point because of this point's high elevation.

Views of Point Ruston Proposal from Southwest of Project

■ **Figure 3.2-20**

- **Viewpoint Location:** Stack Hill (Location 5 shown on Figure 3.2-1)
- **Elevation of the Viewpoint:** 118 ft.
- **Viewshed:** This viewshed presents the broadest view (approx. 135 degrees) across the central portion of the site looking northeast and across the entire project site. Commencement Bay, Vashon Island, Maury Island¹ is in near distance, and the Kitsap Peninsula, the Olympic Mountains and Browns Point are in the background. The picture of this viewshed is taken from a location estimated to be at the lowest elevation on "Stack Hill" development.
- **View Analysis and Impact:** This viewshed depicts the anticipated view from Stack Hill looking generally across a number of buildings within the proposed project at "full buildout." These structures include various types of uses including retail and mixed-use (residential, retail/commercial). The full width of the viewshed with the proposed buildings is shown in Figure 3.2-20. As shown, the proposed structures would block a portion of the view of Commencement Bay but not affect views of Vashon Island or of Maury Island, or of the more distant views of the Sound. The proposed structures on the southeast end of the project would block a segment of the view of Commencement Bay and in the distance the lower hillside associated with Browns Point.

¹ Maury Island is more to the center of this photograph and Vashon Island is to the left. The north-end of Maury Island is connected Vashon Island so Vashon appears closer in this photo.



Figure 3.2-19
Location 4: Residence on Commercial Street near Baltimore
Elevation: Approximately 135'
Facing: Northeast

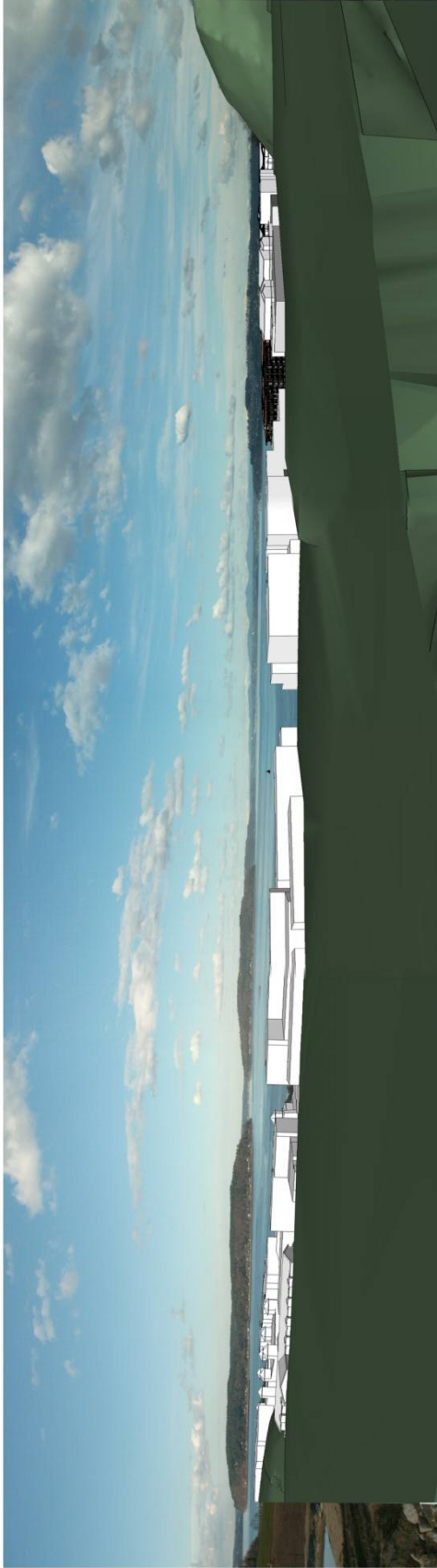


Figure 3.2-20
 Location 5: Stack Hill
 Elevation: 118'
 Facing: Northeast

■ **Figure 3.2-21**

- **Viewpoint Location:** Undeveloped Area East of Stack Hill at end of Orchard (Location 6 shown on Figure 3.2-1)
- **Elevations of the Viewpoint:** Approximately 160 ft.
- **Viewshed:** The view from the 160-foot elevation is a constrained view as a result of the existing trees. The photograph was taken during late autumn and the majority of the trees in the viewshed are deciduous, therefore, views from this viewpoint at this time of the year are possible. At other times of the year, however, the view would be significantly constrained. The view from this location is a broad view (approx. 120 degrees) across the south one-third of the site looking east. The views shows Commencement Bay in near distance and Vashon Island, Maury Island and Browns Point in the far distance.
- **View Analysis and Impact:** This viewshed depicts the anticipated view from an area east of Stack Hill looking generally across many of the buildings in the Tacoma area of *Point Ruston* at the south-end of the site. These structures include retail and mixed-use (residential, retail/commercial). The view, when it exists through the trees, depicts the full proposed project area and viewers would see the tops of buildings. It shows that much of the view of Commencement Bay, Maury Island, Vashon Island and the north portion of Browns Point from this location would not be obstructed by the proposed *Point Ruston* development at this elevation. Again, the only impact to the view without the trees would be to the shoreline of the project along Commencement Bay.

■ **Figures 3.2-22 and 3.2-23**

- **Viewpoint Location:** Undeveloped Area East of Stack Hill above Railroad near Ferdinand (Locations 7 and 8 shown on Figure 3.2-1)
- **Elevations of the Viewpoint:** 80 ft. and 65 ft.
- **Viewshed:** The views from these elevations are strongly obstructed by the existing trees. The photograph was taken during winter and the majority of the trees in the viewshed are deciduous, therefore, views from this viewpoint at this time of the year are possible. At other times of the year, however, the view would be significantly constrained. The view from this location is a broad view (approx. 120 degrees) across the south one-third of the site looking east. The views show Commencement Bay in near distance and Vashon Island, Maury Island and Browns Point in the far distance. Figures 3.2-22 and 3.2-23 were taken in the same general area, but at separate elevations.
- **View Analysis and Impact:** This viewshed depicts the anticipated view from an area east of Stack Hill looking generally across at the southeast end of the site. These structures include retail and mixed-use with a large



Figure 3.2-21

**Location 6: Undeveloped Area at north end of Orchard Street
Elevation: Approximately 160'
Facing: Northeast**



Figure 3.2-22

**Location 7: Undeveloped Area above Railroad near Ferdinand Street
Elevation: 80'
Facing: Northeast**

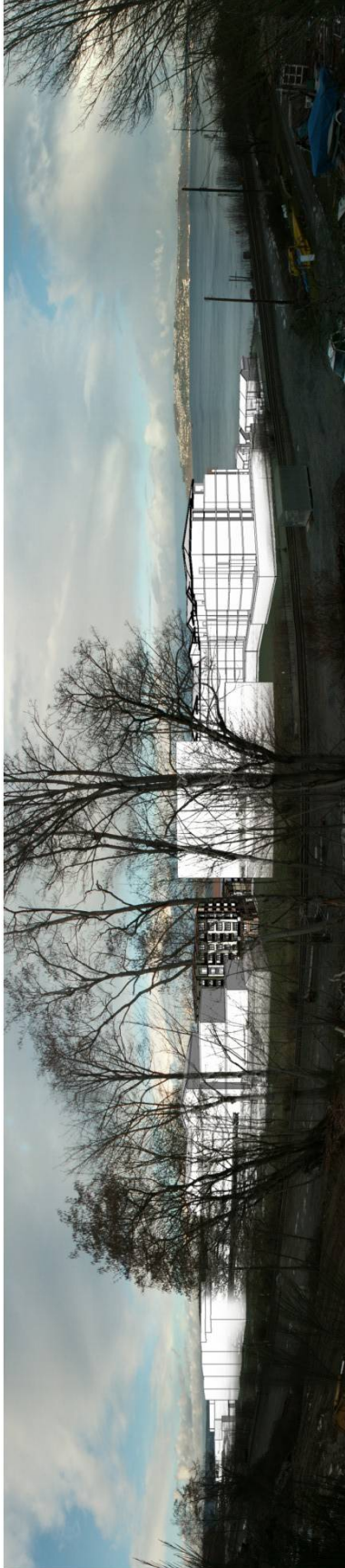


Figure 3.2-23

Location 8: Undeveloped Area above Railroad near Ferdinand Street

Elevation: 65'

Facing: Northeast

amount of residential activity. Figure 3.2-22 is the view from the higher elevation (from the 80-foot elevation) and depicts the full width of the viewshed. It shows that some of the view of Commencement Bay, Maury Island, Vashon Island and the north portion of Browns Point from this location would be obstructed by the proposed *Point Ruston* development. Figure 3.2-23 is the view from the 65-foot elevation and it shows that the view of Commencement Bay, Maury Island, Vashon Island and the north portion of Browns Point would be obstructed by the proposed *Point Ruston* development.

Views of Point Ruston Proposal from Southwest of Project

■ **Figures 3.2-24 and 3.2-25**

- **Viewpoint Location:** Existing Houses near Ferdinand and Ruston Way (Locations 9 and 10 shown on Figure 3.2-1)
- **Elevations of the Viewpoint:** Approximately 50 and 55 feet
- **Viewshed:** The view from the residences is less constrained than the views from locations 7 and 8 noted on Figure 3.2-1 to the west, because there are fewer trees between the residences and the site. However, the trees on the north side of the railroad prevent some views of the site as it exists. Views exist of Vashon Island, Muary Island and the Sound between deciduous trees. The photograph was taken during late autumn showing more view than exists during other parts of the year when leaves are on trees.
- **View Analysis and Impact:** This viewshed depicts the anticipated view looking across primarily residential buildings at the south-end of the site. Figure 3.2-24 is the view from the existing residence near developing property just above the existing railroad. Some of the views of Commencement Bay, all of Maury Island and Vashon Island from this location would be obstructed by the proposed "*Point Ruston*" development. Figure 3.2-25 is the view from another existing residence in the same vicinity but closer to Ferdinand Street. As at the other site, it shows that some of the views of Puget Sound, Maury Island, Vashon Island would be obstructed by the proposed "*Point Ruston*" development. Views of Commencement Bay would be unobstructed since most of the Bay is not in line with the proposed project.

■ **Figure 3.2-26**

- **Viewpoint Location:** Ruston Way South of Site Looking North (Location 11 shown on Figure 3.2-1)
- **Elevation of the Viewpoint:** 17 ft.



Figure 3.2-24
Location 9: First Existing House near Ferdinand and Ruston Way
Elevation: Approximately 50'
Facing: North



Figure 3.2-25

Location 10: Second Existing House near Ferdinand and Ruston Way

Elevation: Approximately 55'

Facing: North

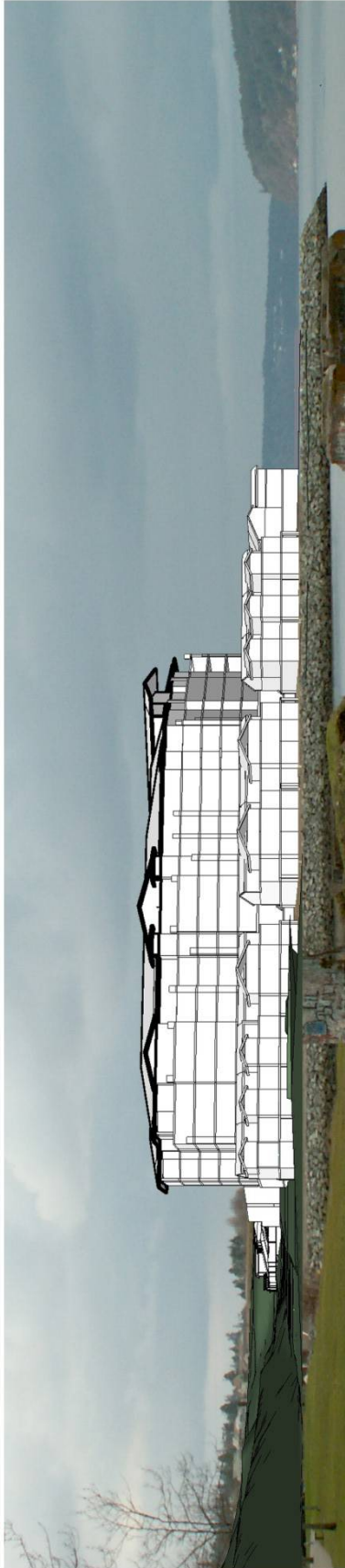


Figure 3.2-26

Location 11: Ruston Way South of Site Looking North

Elevation: 17'

Facing: Northwest

- **Viewshed:** The view from this viewpoint is of the south portion of the project site looking northwest. The view shows the hillside on the left (west), Commencement Bay in the foreground and on the right (east), Maury Island in near distance, and Vashon Island in the distance. Olympic Mountains can be seen on clear days in the distant
- **View Analysis and Impact:** Impacts from the proposed project upon this viewshed includes obstruction of mountains in the background. The view is looking at the south-end structures of primarily residential activities. Buildings with both commercial and residential uses mixed-uses would be visible at this point also. From this location the view of Puget Sound and most of Vashon Island seen to the north would be obstructed by the proposed *Point Ruston* development as would views of the Olympic Mountains on clear days until one is on the promenade on the eastern side of the site. Views of Commencement Bay and Maury Island, however, would be unobstructed.

Views of Point Ruston Proposal Site from Ruston Way

■ **Figures 3.2-27 and 3.2-28**

- **Viewpoint Location:** Two points on Ruston Way approximately midway through the project (Locations 12 and 13 shown on Figure 3.2-1)
- **Elevations of the Viewpoints:** Between 19 ft. and 28 ft.

Viewshed: Views from points along the proposed *Point Ruston* development looking northeast have been analyzed. Ruston Way is approximately 800 ft. southwest of the shoreline of Commencement Bay. Views from this area show segments of Commencement Bay with Maury Island and Vashon Island in the distance. Ruston Way presently averages 6 ft. below the existing grade of the project site.

View Analysis and Impact: Proposed re-alignment of Ruston Way would raise the Ruston Way Grade and provide improved views of the water through the proposed view corridors. The views analyzed from Ruston Way are depicting proposed buildings within approximately 50 feet east of where Ruston Way would exist. The structures proposed include retail and/or mixed-use (residential, retail/commercial) and would show a large amount of pedestrian activity next to the buildings. As shown by the figures, the proposed view corridors would provide views of Commencement Bay through the project site. At this proximity to the site much of water views would be secondary to the human activity around commercial and pedestrian spaces and around the close, proposed buildings.

Special Note: Following the publishing of the Draft Supplemental EIS the site plan was revised to flip buildings 2 A and B with buildings 3 A and B. Both buildings are visible in Location 12 Figure 3.2-27 without this change. This site plan revision has no impact on the width of the view corridor, but has shifted the corridor five degrees to the east. Further analysis has concluded that this is not a significant adverse impact and therefore no revision is necessary to the summary of impacts.



Figure 3.2-27
Location 12: Ruston Way Along Site Looking North
Elevation: 37'
Facing: North



Figure 3.2-28
Location 13: Ruston Way Along Site Looking North
Elevation: 39'
Facing: North

3.2.3 Significant Impacts of the No Action Alternative

The *Master Development Plan* Draft EIS identifies 12 points within the general vicinity of the ASARCO site at which views were analyzed. Neither the City of Tacoma nor the Town of Ruston has officially-designated viewpoints or scenic routes, therefore, none of the viewpoints that were selected, pertain to any officially-designated viewpoints or scenic route. The viewpoints that are noted in the *Master Development Plan* Draft EIS were selected based upon scenic quality and viewer sensitivity (MDP DEIS page 4-61).

At the time the photos were taken (1997) the ASARCO plant was closed, the site was in a deteriorated state, some of the buildings had been removed, and the site was fenced with a cyclone fence.

The impact analysis for the MDP noted that overall for the build alternatives, because of the phased nature of the project, construction cranes and large equipment could be visible from adjacent areas with direct or indirect views of the area, which “would be considered less obtrusive than those of the current conditions.”²

The DEIS noted that for Moderate alternative, Alternative 3:

“Minimal obstruction of views of Commencement Bay could occur at areas in the proximity of Ferdinand St. and Ruston Way, Ferdinand St. and North 49th St., area surrounding Commercial St. between Baltimore and Bennett Streets, North 51st St. and Highland St. and particularly along Bennett St. from the height and proximity of structures proposed on all development areas.”³

The MDP DEIS noted further that “overall, the impacts with the application of appropriate mitigation, as listed below, would be minimal.”

As a point of comparison of impacts upon viewsheds, graphics contained in this section of the SEIS illustrate how the approved conceptual layout for the ASARCO MDP site (the “Moderate, Alternative 3 layout) would impact views in this area. Figure 3.2-29 shows the approved conceptual layout of Alternative 3 as estimated from the MDP DEIS (Figure 2-3, page 2-16) and represents “no action” for this analysis. Figures 3.2-30 through 3.2-42 is a series of photosimulations over the photos taken from the locations designated on Figure 3.2-1. Each of the following viewshed analyses depict views across the site as the site would exist with the approved MDP Alternative 3 Conceptual Site Plan. This is done so impacts of development meeting the MDP on the viewshed can be directly compared to the visual impacts of the proposed “Point Ruston” project on the viewshed.

Views of MDP Alternative 3 from North of Project Site

■ **Figure 3.2-30**

- **Viewpoint Location:** Tacoma Yacht Club Parking Lot Looking South (Location 1 shown on Figure 3.2-1)

² DEIS, pg. 4-71

³ DEIS, pg. 4-72



Figure 3.2-29: Master Development Plan “ALTERNATIVE 3” conceptual layout approved by the Town of Ruston and addressed in 1997 DEIS



Figure 3.2-30
Location 1: Tacoma Yacht Club Parking Lot
Elevation: 15'
Facing: Southeast

- **View Analysis and Impact:** The view depicting buildings at the north-end of the site within the MDP Alternative 3 would house commercial activities at approximately 60 feet and would not have a significant impact upon the views of the residential areas, or Commencement Bay and the background mountains. Like the proposed *Point Ruston* project, viewing the MDP alternative from this location indicates that the proposed buildings would partially obstruct views of the hillside to the southeast of the site. Also, like the proposed project views in the immediate vicinity would most likely be improved with alternative because the site's landscaping would be Improved. The current fencing and roadways would be replaced with lawns, public spaces and new streets taking advantage of the water environment. There is not a significant difference between this alternative and the proposed project from this location.

■ Figure 3.2-31

- **Viewpoint Location:** Bennett St. above the Onsite Containment Facility- OCF (Location 2 shown on Figure 3.2-1)
- **View Analysis and Impact:** As with the *Point Ruston* proposal building rooftops are most evident at this elevation from this perspective. Many of the buildings observed at this point will exist in the center of the property and towards the water. Many of the buildings viewed from this location will have commercial offices.

The impact upon the viewshed is seen on Figure 3.2-31. When looking eastward over the alternative MDP structures, buildings constructed to the maximum would block a portions of the near-shoreline views of Commencement Bay and the existing docks and piers, but not affect the views of the Sound or the Islands visible from this site, similar to the proposal. More open space is evident near Ruston Way within the MDP alternative than in the *Point Ruston* proposal.

When viewing southeast over the project toward Tacoma, the alternative MDP structures at less height than the proposal would still block a segment of the view of Commencement Bay and in the distance the lower hillside associated with Browns Point. Any views of the mountain ranges and Mount Rainier would be unaffected.

■ Figure 3.2-32

- **Viewpoint Location:** Residence around 51st and Bennett Street (Location 3 shown on Figure 3.2-1)

View Analysis and Impact: This viewshed is a southerly view of the project site from an area north of *Point Ruston*. Like with the *Point Ruston* project buildings built to the maximum in the MDP alternative would block views of Commencement Bay to almost Brown's Point and

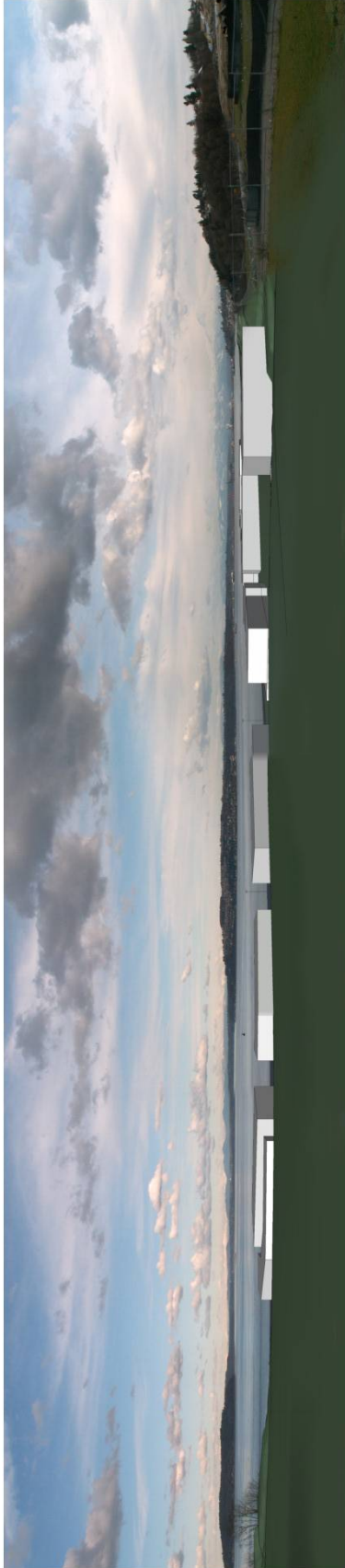


Figure 3.2-31
Location 2: Bennett Street above the OCF
Elevation: 108'
Facing: East

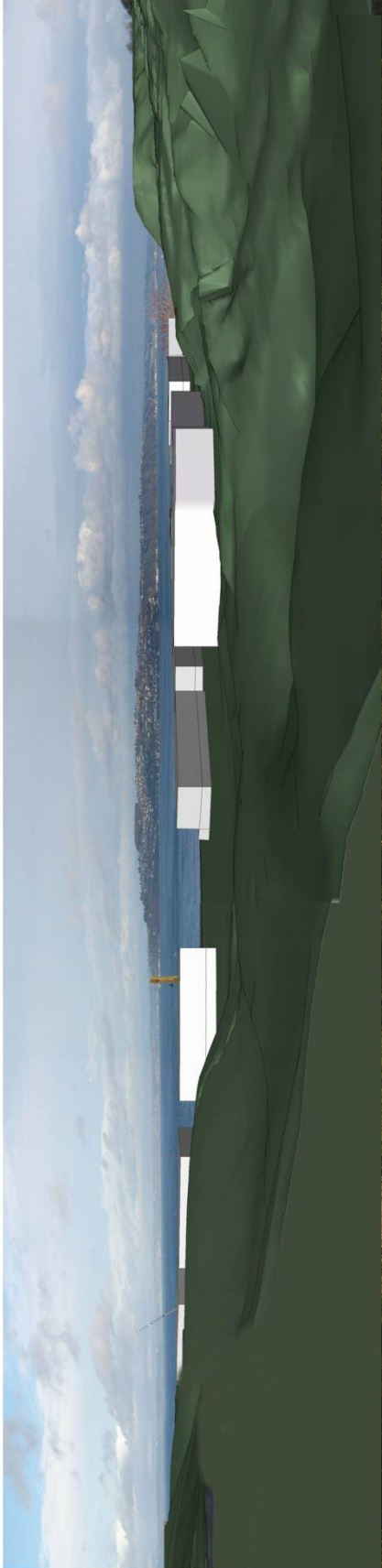


Figure 3.2-32
Location 3: Residence around 51st and Bennett Street
Elevation: Approximately 110'
Facing: East

the near-shoreline existing docks and piers. The views of the mountain ranges and Mount Rainier where seen would be unaffected.

■ **Figure 3.2-33**

- **Viewpoint Location:** Residence on Commercial Street near Baltimore (Location 4 shown on Figure 3.2-1)
- **View Analysis and Impact:** As with other sites in the residential area northwest of the Point Ruston site, homes at this elevation would view the tops of buildings outlined in the alternative MDP. The structures would be fewer and slightly lower in height in the alternative MDP. As shown in Figure 3.2-33, the proposed structures would block a portion of the view of Commencement Bay near the shoreline, but will not affect views of Maury Island or the more distant views of Vashon Island and the Kitsap Peninsula. More open spaces toward Ruston Way would be evident in the alternative MDP than in the proposed *Point Ruston* project. The alternative MDP structures on the southeast of the project would not block the distant lower hillside associated with Browns Point because of the elevation of this location and because the structures are planned at a less height.

Views of MDP Alternative 3 from Southwest of Project Site

■ **Figure 3.2-34**

- **Viewpoint Location:** Stack Hill (Location 5 shown on Figure 3.2-1)
- **View Analysis and Impact:** This viewshed depicts the anticipated view from the lower elevation of the Stack Hill project looking across all of the buildings that could be built in the *Point Ruston* project area under the MDP alternative. Structures proposed under the MDP alternative are spaced farther apart than in the proposal and would include primarily office uses. Like in the proposal and as shown in Figure 3.2-34, the proposed structures would block a portion of the view of Commencement Bay but not affect views of Maury Island or the more distant views of Vashon Island or the Sound. The alternative MDP structures at the southeast end of the project area would block a segment of the view of Commencement Bay but not impact views of Brown's Point. Lower areas would from Ruston Way would be more open in the alternative than in the proposal.

■ **Figure 3.2-35**

- **Viewpoint Location:** Undeveloped Area East of Stack Hill at end of Orchard (Location 6 shown on Figure 3.2-1)



Figure 3.2-33

**Location 4: Residence on Commercial Street near Baltimore
Elevation: Approximately 135'
Facing: Northeast**



Figure 3.2-34
Location 5: Stack Hill
Elevation: 118'
Facing: Northeast



Figure 3.2-35

**Location 6: Undeveloped Area at North end of Orchard Street
Elevation: Approximately 160'
Facing: Northeast**

- **View Analysis and Impact:** Visual impacts upon this viewshed from the MDP alternative are similar to the visual impacts from the proposed project. From an area east of Stack Hill the view, when it exists through the trees, would display the tops of commercial buildings under the MDP alternative. It shows that much of the view of Commencement Bay, Maury Island, Vashon Island and the north portion of Browns Point from this location would not be obstructed by the MDP alternative structures. Again, the only impact to the view without the trees would be to the shoreline of the project along Commencement Bay.

■ **Figures 3.2-36 and 3.2-37**

- **Viewpoint Location:** Undeveloped Area East of Stack Hill above Railroad near Ferdinand (Locations 7 and 8 shown on Figure 3.2-1)
- **View Analysis and Impact:** Impacts upon this viewshed from buildings permitted in the MDP alternative is not significantly different than the impacts from buildings created by the Point Ruston proposal. From an area east of Stack Hill looking northward across to the project site towards Ruston to the southeast end, the commercial structures permitted would impact views of the Sound and the Islands in much the same way as the *Point Ruston* proposal. Even though there are fewer buildings in the MDP alternative and their height is less than buildings in the proposal, they are broad and cover much of the same area as the proposal. Figure 3.2-36 is the view from the 80-foot elevation and shows that the view of Commencement Bay, Maury Island, Vashon Island and the north portion of Browns Point from this location would be slightly obstructed by the MDP alternative development. Figure 3.2-37 is the view from the 65-foot elevation and it shows that the view of Commencement Bay, Maury Island, Vashon Island and the north portion of Browns Point would be obstructed by the MDP alternative in much the same way as the proposed *Point Ruston* project.

Views of MDP Alternative 3 from Southeast of Project Site

■ **Figures 3.2-38 and 3.2-39**

- **Viewpoint Location:** Existing Houses near Ferdinand and Ruston Way (Locations 9 and 10 shown on Figure 3.2-1)
- **View Analysis and Impact:** Impacts upon this viewshed from the MDP alternative at the existing house locations near Ferdinand are very similar to those of the proposal. Figure 3.2-38 shows the impact of the MDP buildings from an existing residential structure accessed by a driveway just above the existing railroad. Some of the views of Commencement Bay, all of Maury Island and Vashon Island from this location would be obstructed by the MDP alternative structures very similar to the proposed *Point Ruston* development. Figure 3.2-39 is the view from another existing residence at Ferdinand further south from the other residence.

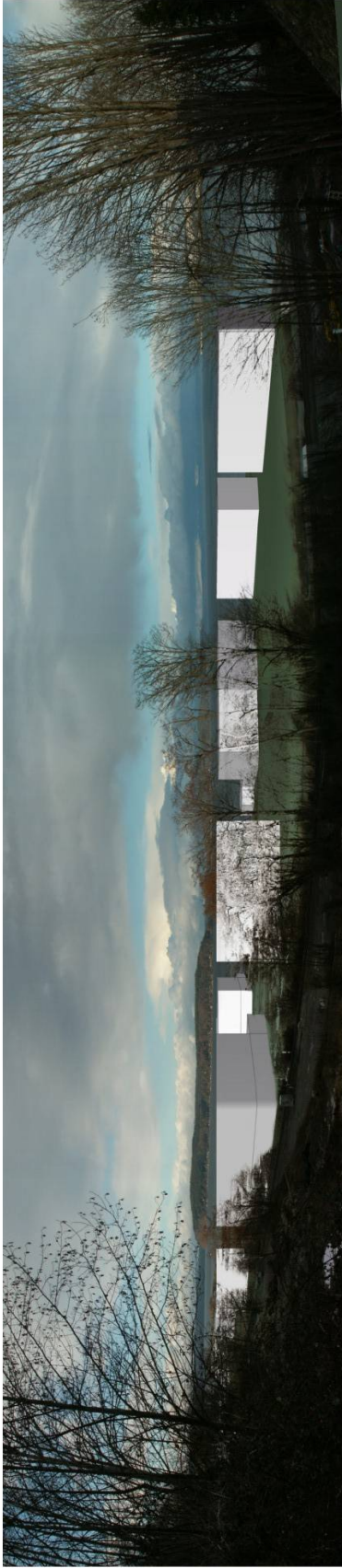


Figure 3.2-36

Location 7: Undeveloped Area above Railroad near Ferdinand Street

Elevation: 80'

Facing: Northeast



Figure 3.2-37
Location 8: Undeveloped Area above Railroad near Ferdinand Street
Elevation: 65'
Facing: Northeast



Figure 3.2-38
Location 9: First Existing House near Ferdinand and Ruston Way
Elevation: Approximately 50'
Facing: North



Figure 3.2-39

Location 10: Second Existing House near Ferdinand and Ruston Way

Elevation: Approximately 55'

Facing: North

Like other projections these figures show that some of the views of Puget Sound, Maury Island, Vashon Island would be obstructed by the potential MDP development. Views of Commencement Bay would be

■ **Figure 3.2-40**

- **Viewpoint Location:** Ruston Way South of Site Looking North (Location 11 shown on Figure 3.2-1)

View Analysis and Impact: Impacts upon this viewshed from the MDP alternative structures are again similar to those of the proposed project. Buildings in this alternative are longer and slightly lower than the proposed project, so similar views would be blocked if structures were built according to the MDP. From this location the view of Puget Sound and most of Vashon Island seen to the north would be obstructed by MDP structures if developed as would views of the Olympic Mountains on clear days. Views of Commencement Bay and Maury Island, however, would still be possible.

Views of MDP Alternative 3 from Ruston Way at the Site

■ **Figures 3.2-41 and 3.2-42**

- **Viewpoint Location:** View Corridors Along Ruston Way
- **View Analysis and Impact:** The views analyzed from Ruston Way, depict buildings that could be constructed under the MDP alternative. Buildings could be constructed between 50 feet and 100 feet east of the where Ruston Way would exist. The structures proposed include primarily retail and office uses, and the large turn-around creates a large vision of open space between structures and existing residences. The buildings depicted are 60 feet in height in the MPD alternative and have more open parking areas than the proposal and therefore, would not show a noticeable difference to the driver or pedestrian moving through Ruston Way when compared to the *Point Ruston* proposal. There are also view corridors between the buildings and through the site between the buildings, as indicated as view corridors under the *No Action Alternative*. As with the proposal being this close to the view, much of the water views would be secondary to the human activity around commercial and pedestrian areas, and would become primary only after one was on the site and near the water.

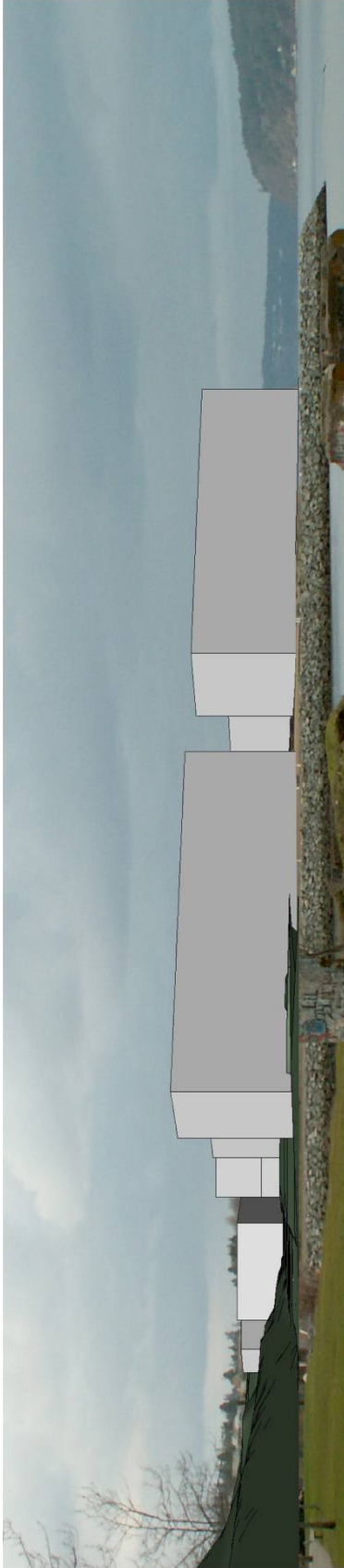


Figure 3.2-40
Location 11: Ruston Way South of Site Looking North
Elevation: 17'
Facing: Northwest



Figure 3.2-41

Location 12: Ruston Way Along Site Looking North

Elevation: 37'

Facing: North

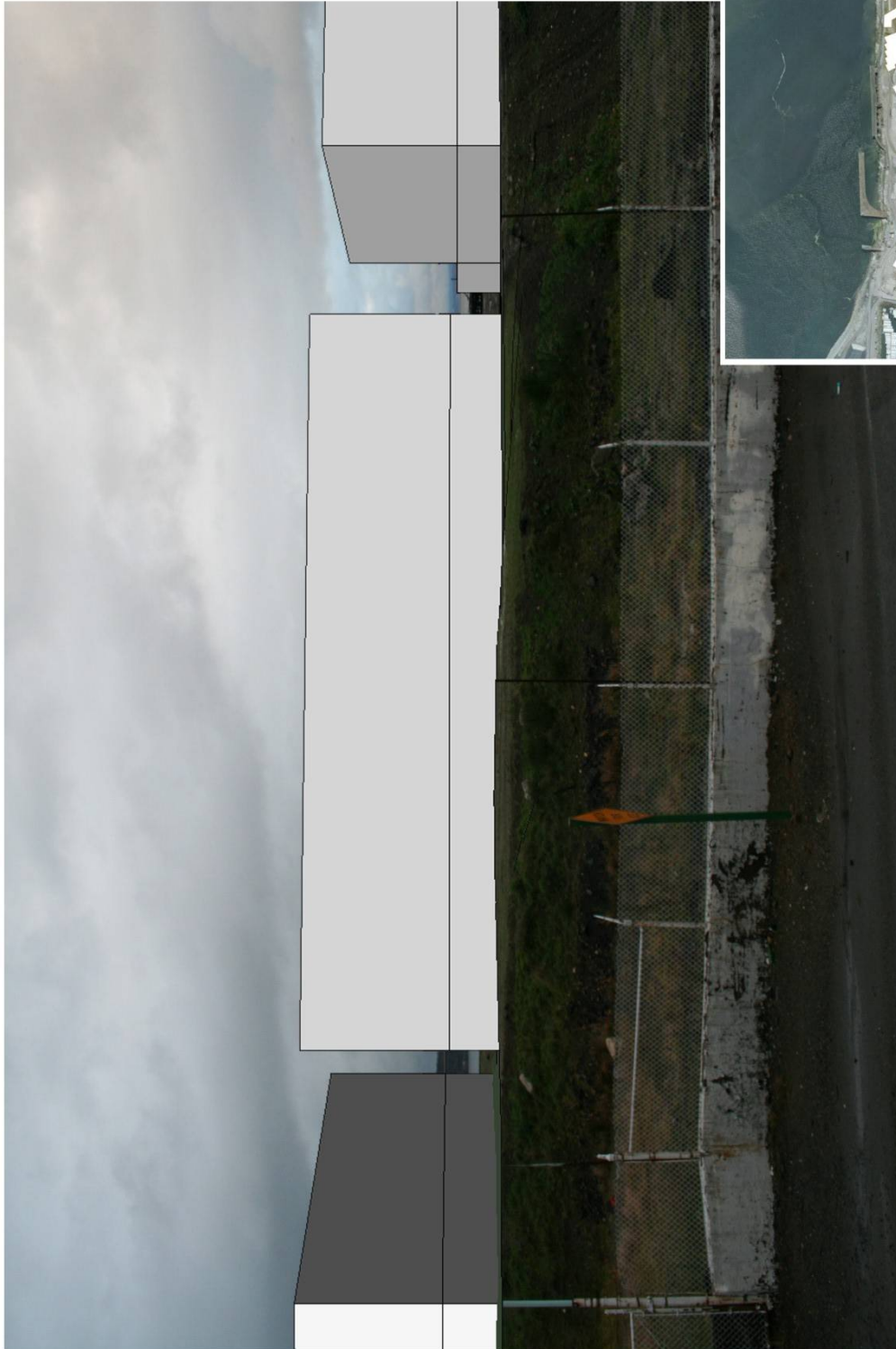


Figure 3.2-42
Location 13: Ruston Way Along Site Looking North
Elevation: 39'
Facing: North

3.2.4 Mitigating Measures

No significant adverse impacts are anticipated from the proposed *Point Ruston* development. View impacts created by the development will be mitigated from extensive landscaping and extensive design of buildings. Terracing of some buildings and varying of building heights within height requirements will be considered at time of building permit activity. As well, the spacing between the buildings will create view corridors, allowing views through the developed site, and out to the Bay. Buildings will have to meet permit regulations through required reviews within respective jurisdictions at the time permits are sought for individual buildings.

Providing a 100-feet wide open space with a fully developed public promenade will provide a public benefit that has not existed before. The public accessed promenade will permit the public to see the shore at this location which has not been available to the public previously. The developed promenade and open space will provide the Town of Ruston a public accessible shoreline which it has never possessed. These public shorelines will enhance public views of the Sound, Commencement Bay, Vashon Island, Maury Island and the Olympic Mountains from these points.

3.2.5 Significant Unavoidable Adverse Impact

No significant unavoidable adverse aesthetic-related impacts are anticipated.

3.3 HOUSING

This section of the FSEIS analyzes housing-related issues associated with the *Proposed Action*.

3.3.1 Background and Analysis

Washington State University's Center for Real Estate Research publishes a supply/demand assessment quarterly. According to statistics reported by the Center,¹ the median selling price for a resale home in the State of Washington during the second quarter of 2007 increased 8.1 percent from the second quarter of 2006, to \$316,700. Pierce County's median single-family resale home price was \$283,500, a 5 percent increase over the previous year's median resale price.

By contrast, data on attached homes collected by research firm New Home Trends in March 2007 for the "west Tacoma" market (defined as downtown Tacoma, University Place, Fircrest & Gig Harbor) showed 268 attached units (condominiums/townhomes) for sale with an average listing price of \$416,943. Prices for the 268 attached units ranged from a low of \$157,950 for a 625 sq. ft. unit in an apartment-to-condo conversion to a high of \$949,120 for a 1,961 sq. ft. new construction, luxury condo with waterfront views. Sales prices are influenced by construction costs, building type, location and amenities. High-density multi-family buildings with structured parking garages and steel framing cost considerably more to build than those that utilize wood framing and surface parking lots but have the advantage of achieving urban densities to help local jurisdictions meet comprehensive plan and WA State Growth Management Act goals.

3.3.2 Affected Environment

Tacoma's most current *Consolidated Plan for Housing and Community Development, 2005-2010*² includes sections on housing and community development needs assessment, a five-year housing and community development strategic plan, and an annual action plan. The document was prepared in accordance with requirements published by the Department of Housing and Urban Development (HUD) for local jurisdictions requesting federal housing assistance through provisions of the National Affordable Housing Act of 1990, as amended.

Although federally-subsidized housing is neither anticipated nor required of *Point Ruston*, the proposed development would support a number of goals and objectives found in Tacoma's *Consolidated Plan*, as outlined below:

¹ See www.wcrer.wsu.edu

² Tacoma-Lakewood HOME Consortium, 2005 (See *References* section in this DSEIS for full citation.)

Land Use and Population Density/Planned Development

- Most of Tacoma residential areas consist of low-density single family or small multi-family housing. New residential development is expected to center around mixed-use areas and along transportation corridors.
- Mixed-use centers will contain neighborhood businesses as well as more dense residential development and offer better transportation and service options and other amenities that make living in these neighborhoods attractive.
- Like other developed cities, Tacoma has little vacant land for new development and is acquiring little new property through annexation.
- Most new construction in Tacoma now focuses on redevelopment consistent with the City's vision for planned growth to support industry, commerce, public facilities and services and residential needs.
- One of the key strategies for accommodating increased population is to encourage growth around mixed-use centers and along some transportation corridors. These areas will support multiple housing choices, increased density, retail and commercial outlets, more services, and access to transportation.
- The substantial capacity for new housing development in Tacoma is reflected in the 2002 Pierce County Buildable Lands Report. According to the analysis of residential capacity contained in that report based on current zoning and density limitations, the City could accommodate an additional 40,000 units. Given an average household size of 2.45 persons, this would translate into housing for an additional 90,000 people.
- Many remaining vacant parcels have added costs associated with slopes, drainage and other features (such as environmental remediation) not associated with the first and easier land picks.
- There is considerable new development in Tacoma, with a particular City focus on the downtown area and the other mixed use centers along transportation corridors and neighborhood centers.
- The development plan for the downtown area calls for 2,000-4000 new market rate housing units to be provided and absorbed during the first 10 years of the century. While on target with this plan, the rising cost of materials may challenge the expectation for completion of up to 4,000 units.
- The increase in market rate housing and investment in amenities in the downtown and other areas in Tacoma should improve overall housing conditions, increase housing choices and reduce concerns about crime and blight in some areas.

Table 3.3.1 is a comparison of year 2000 population demographics by age group within the City of Tacoma and the Town of Ruston, compared with Statewide and U.S. averages. As shown, Tacoma's statistics approximate those of Washington and the U.S., whereas Ruston has a greater percentage of the population in the age groups 25-44 and 45-64.

**Table 3.3.1
TACOMA/RUSTON POPULATION BY AGE, 2000**

Age	Tacoma		Ruston		WA	US
0-15 years	41,779	21.6%	122	16.5%	21.3%	21.4%
15-24	28,287	14.6%	90	12.2%	13.9%	13.9%
25-44	61,152	31.6%	247	33.5%	30.8%	30.2%
45-64	39,344	20.3%	200	27.1%	22.8%	22.0%
65+	22,994	11.9%	79	10.7%	11.2%	12.4%
Total	193,556		738			

Source: U.S. Census Bureau, 2000 Census

Table 3.3.2 provides a comparison of household income by age group for Tacoma and Ruston -- compared with Washington State and U.S. data. As shown, the median household income in Tacoma is below that of the State, the U.S. and Ruston for most age groups. Ruston's population within the demographic groups 35-44 and 45-54 meet or exceed the nationwide averages. The demographic group 65-74 is nearly double that of the averages for Tacoma, the State and the U.S.

**Table 3.3.2
TACOMA/RUSTON HOUSEHOLD INCOME BY AGE GROUP**

Age	Tacoma	Ruston	WA	US
Median H/H Income	\$37,879	\$48,393	\$45,776	\$41,994
Under 25	\$21,864	\$15,000	\$24,481	\$22,679
35-44	\$38,690	\$49,375	\$43,570	\$41,414
45-54	\$43,641	\$50,556	\$53,202	\$50,654
55-64	\$47,245	\$49,583	\$59,445	\$56,300
65-74	\$30,979	\$61,250	\$34,849	\$31,368
75 & Older	\$24,226	\$13,750	\$25,659	\$22,259

Source: U.S. Census Bureau, 2000 Census

Table 3.3.3 is a comparison of apartment rental activity for the North Tacoma area, the Downtown/Stadium District and Pierce County in general for 2005 and 2006. As shown, vacancy rates, average rental rates and average days vacant for units in North Tacoma decreased slightly between 2005 and 2006 whereas vacancy rates and rental rates increased between 2005 and 2006.

**Table 3.3.3
COMPARABLE APARTMENT RENTAL ACTIVITY**

	Vacancy Rate		Average Rent		% Offering Incentives		Average Days Vacant	
	9/05	9/06	9/05	9/06	9/05	9/06	9/05	9/06
North Tacoma	4.9%	4.4%	\$668	\$662	25.0%	16.7%	27	21
Downtown /Stadium District	3.3%	5.6%	\$825	\$813	23.8%	13.6%	23	20
Pierce County	4.9%	7.4%	\$704	\$736	43.8%	31.4%	19	19

Source: Dupre + Scott Apartment Vacancy Report, September 2006.

Table 3.3.4 is a breakdown of the households aggregated for the cities of Tacoma, University Place, Gig Harbor, Fircrest and Ruston by age group (between 25 and 74) and income using estimated 2005 household incomes. The table indicates that there are 80,346 households in the market area with a head of household between the ages of 25 and 74. For example, for households earning between \$50,000 and \$74,000, they can afford (with a 20 percent down payment and a 7 percent mortgage) homes within the range of \$180,000 to \$269,000. If renting, they can afford rental rates of \$1,042 to \$1,562. This demographic comprises approximately 22 percent of the total number of households within this group.

- 23 percent are in the 25-34 age group;
- 24 percent are in the 35-44 age group;
- 21 percent are in the 45-54 age group;
- 21 percent are in the 55-64 age group; and
- 17 percent are in the 65-74 age group.

Table 3.3.4
NUMBER OF HOUSEHOLDERS IN MARKET AREA BY AGE AND INCOME:
CITIES OF TACOMA, UNIVERSITY PLACE, GIG HARBOR, FIRCREST AND RUSTON

2005 Income Levels	Price of Home that can be Afforded Based on 20% Down & 7% Mortgage	Rental Rates that can be Afforded	Age Range					TOTAL
			25-34	35-44	45-54	55-64	65-74	
Total # of Households by Age Range			16,745	19,060	20,893	15,023	8,625	80,346
Under \$25,000	Under \$90,000	\$520 and below	3,612	3,562	3,427	2,935	2,628	16,164
			22%	19%	16%	20%	30%	20%
\$25,000-\$49,999	\$90,000 - \$179,996	\$520 - \$1042	5,918	5,074	4,915	3,647	2,642	22,196
			35%	27%	24%	24%	31%	28%
\$50,000-\$74,999	\$180,000 - \$269,996	\$1042 - \$1562	3,775	4,647	4,373	3,201	1,437	17,433
			23%	24%	21%	21%	17%	22%
\$75,000-\$99,999	\$270,000 - \$359,996	\$1563 - \$2083	1,802	2,733	3,390	2,053	767	10,745
			11%	14%	16%	14%	9%	13%
\$100,000-\$149,999	\$360,000 - \$539,996	\$2083 - \$3125	1,240	2,065	3,369	2,202	783	9,659
			7%	11%	16%	15%	9%	12%
\$150,000-\$199,999	\$540,000 - \$719,996	\$3125 - \$4167	235	471	802	468	152	2,128
			1%	2%	4%	3%	2%	3%
\$200,000 - \$249,999	\$720,000 - \$899,996	\$4167 - \$5208	88	199	242	217	124	870
			1%	1%	1%	1%	1%	1%
\$250,000-\$499,999	\$900,000 - \$1,799,996	\$5208 - \$10,417	60	276	315	258	82	991
			0%	1%	2%	2%	1%	1%
\$500,000 +	\$1,800,000 +	\$10,417 +	15	33	60	42	10	160
			0%	0%	0%	0%	0%	0%

Source: Data from New Home Trends, March 2007

Defining Housing Affordability

The Department of Housing and Urban Development annually establishes a county-wide Area Median Income (AMI) and rental/for-sale maximum limits to meet affordable housing goals. Using 2007 HUD data, **Tables 3.3.5, 3.3.6** and **3.3.7** show income and housing costs that meet affordable housing guidelines for household incomes earning no greater than 80 percent of the median income or homebuyers with household incomes between 80 – 115 percent of the area median income. “For Rent” means a household spends no more than 30% of gross income for housing plus utilities. “For Sale” guidelines means that a household spends no more than 35-40% of income for principal, interest, taxes and insurance on housing.

Table 3.3.5
2007 Rental Rates based on Pierce County Area Median Income (AMI)

# of persons in Household	Annual Median Income - 2007	80% of Annual Median Income	Monthly Rent at 30%
Family of 1	\$43,500	\$34,800	\$870
Family of 2	\$49,700	\$39,760	\$994
Family of 3	\$55,900	\$44,700	\$1,118
Family of 4	\$62,100	\$49,700	\$1,243

Source: City of Tacoma, Housing Division, April 2007

Table 3.3.6
2007 Estimated For-Sale Prices – 80% Median Income

# of persons in Household	Annual Median Income - 2007	80% of Annual Median Income	Monthly Mortgage (PITI) 35%-40% of Annual Income
Family of 1	\$43,500	\$34,800	\$1,015-\$1,160
Family of 2	\$49,700	\$39,760	\$1,160 - \$1,325
Family of 3	\$55,900	\$44,700	\$1,304 - \$1,490
Family of 4	\$62,100	\$49,700	\$1,450 - \$1,657

Source: City of Tacoma, Housing Division, April 2007

Table 3.3.7
2007 Estimated Sales Prices – 115% of Annual Median Income

# of persons in Household	Annual Median Income - 2007	115% of Annual Median Income	Monthly Mortgage (PITI) 35%-40% of Annual Income
Family of 1	\$43,500	\$50,025	\$1,459 - \$1,668
Family of 2	\$49,700	\$57,155	\$1,667 - \$1,905
Family of 3	\$55,900	\$64,285	\$1,875 - \$2,143
Family of 4	\$62,100	\$71,415	\$2,083 - \$2,381

Source: City of Tacoma, Housing Division, July 2007

3.3.3 Impacts of the Proposed Action

Point Ruston would provide 800 to 1,000 new units of market-rate housing to accommodate families of varying income levels, with an anticipated range of prices between \$300,000 to over \$2,000,000 per unit for-sale as well as market rate rents. As such, it will further the City's goals relative to the provision of additional housing opportunities, consistent with GMA. Federally-subsidized housing, however, is neither anticipated nor required as a component of the proposed *Point Ruston* development.

Because of accelerating construction costs, rising interest rates on consumer mortgages, and site remediation costs that influence the base cost of a unit, for-sale units are not expected to be a viable affordable housing option at *Point Ruston*. However, *Point Ruston* plans include for-rent residential product with approximately 150-200 market-rate apartments and senior rental housing. Point Ruston LLC is researching programs and grants, as well as community partnerships, to enable 10-15 percent of the for-rent units to be available and affordable to households earning 80 percent of the Annual Median Income with rental rates established at the time the units are offered for rent.

3.3.4 Impacts of the No Action Alternative

Housing was not a component of the *Master Development Plan*. and, as such, it would not have contributed toward the City's housing goals under GMA.

3.3.5 Proposed Mitigation

No housing opportunities are being displaced by the proposal, new housing opportunities would be created. No significant adverse impacts are anticipated and no mitigation is necessary.

3.3.6 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts to housing are anticipated as a result of the proposed *Point Ruston* development.

3.4 ENVIRONMENTAL HEALTH

Environmental Health has been identified by the City of Tacoma as one of the areas for discussion in the SEIS. Of specific concern to the City is the potential for exposure to unsafe levels of arsenic and lead during phased remediation, site development, building occupancy, and public use of amenities. It should be noted that as *Point Ruston* is a federal Superfund site, this issue falls under the jurisdiction and enforcement authority of the Environmental Protection Agency (EPA). EPA's selected remedy for the site meets the requirements of protection of human health and the environment and complies with all Applicable or Relevant and Appropriate Requirements (ARARs).

Point Ruston entered into the Second Amendment to the ASARCO Consent Decree (CD) for the site with EPA and the Department of Justice (DOJ) in August 2006 and agreed to complete the remediation of the property, cap sediments along the shoreline, and cap the Breakwater Peninsula owned by MetroParks. The Statement of Work (SOW), an attachment to the Consent Decree, outlines remediation and monitoring requirements established by EPA for the remaining remediation at the site and incorporates the phased approach by addressing release of property by phase, remediation and redevelopment by phase, and occupancy by phase. The SOW incorporates requirements for temporary capping of the site in undeveloped areas and addresses monitoring requirements both during remaining remediation/redevelopment and following final site completion.

Greenhouse gas emissions have been significantly reduced by the closure of the smelter and remediation of the site in anticipation of redevelopment.

3.4.1 Affected Environment

Master Development Plan EIS

The 1997 ASARCO MDP DEIS considered development of the site following remediation and installation of a site wide cap. A potential for placement of building foundations and utility corridors in the contaminated soils was noted. Appendix H to the 1997 EIS, "Toxic and Hazardous Waste Technical Document" notes that,

"Issues related to the Remedial Action (RA) of the site have already been addressed through the Superfund compliance process and will not be reconsidered. However to ensure an understanding of background information this Technical Appendix reviews certain aspects of RA regarding mitigation of impacts for toxic and hazardous wastes as they relate to redevelopment of the ASARCO Smelter site."

It goes on to state that the physical magnitude of the studies completed precluded them from being included in the Technical Appendix and they were incorporated by reference.

Considerable evaluation and planning for development has been completed since the 1997 EIS was published. Residential use was not originally considered for the site based primarily on ASARCO's preference. The 1997 EIS evaluated commercial and light industrial use and specifically excluded residential and heavy industrial use. In more recent years, however, the Development Strategy Team comprised of representatives from the City of Tacoma, Town of

Ruston, Metro Parks, ASARCO, and various experts agreed that residential use of the property is appropriate (see also discussion in *Section II* [2.3.4]). EPA has also agreed that residential use of the property is appropriate and that a phased approach where remediation and redevelopment is occurring simultaneously by phase is acceptable within certain constraints established to protect residents occupying completed phases of the project. EPA has expressed that their primary concern at the site is for public safety during the phased development and occupancy of the site. EPA submitted a letter dated November 13, 2007 to the City of Tacoma in response to the Determination of Significance addressing environmental health. A copy of that letter is included in **Appendix E** to this FSEIS.

3.4.2 Impacts of the Proposed Action

Point Ruston, LLC. is responsible for completing all remaining on-site remediation (and significant portions of off-site remediation) to meet the EPA remedy for the site as agreed to in the Second Amendment to the ASARCO Consent Decree. As each remediation/ building phase is completed, the phase will be released for residential occupancy and use. This phased approach is a critical component to the success of the development and was a primary subject addressed during negotiation of the Second Amendment to the ASARCO Consent Decree.

As described in the 1997 EIS, contaminants of concern at the site include heavy metals (primarily arsenic, lead, copper, and zinc). During 1998 – 2004, ASARCO completed excavation of soils from the most highly contaminated areas of the site defined as Source Areas in the Consent Decree and attached Statement of Work for the site. These soils, classified as federally hazardous waste, were placed in the On-Site Containment Facility (OCF), a containment cell constructed of multiple liners, a leachate collection system, and a leak detection system designed specifically to house these soils. The On-Site Containment Facility was designed and constructed in compliance with the Federal Code of Regulations specific to hazardous waste landfills (40 CFR Part 264) inclusive of the requirements for a leak detection, collection and removal system as required by the March 1995 EPA Record of Decision. Construction of the OCF began in 1999 and final placement of the OCF cover system was completed in autumn 2005. The OCF is continually monitored in accordance with EPA requirements.

Remaining site soils consist primarily of residential soils that have been placed on-site as sub-grade material to be capped as part of the final remediation. These soils contain much lower concentrations of metals, most directly comparable to those found in residential yards in the Ruston/North Tacoma Study Area. The phased approach to development and occupancy will necessitate work in the residential soils that have been placed on-site while one or more constructed buildings are occupied resulting in potential impacts related primarily to uncontrolled dust generation during construction.

3.4.3 Impacts of the No Action Alternative

Implementation associated with the *No Action Alternative* (Master Development Plan) would involve site remediation in accordance with the approved EPA Consent Decree.

3.4.4 Mitigation Measures

Mitigation of environmental impacts associated with site remediation will be addressed by EPA as their responsibility under Superfund law. Paragraph 13 of the Second Amendment to the ASARCO Consent Decree (CD) explains that *Point Ruston* plans to develop the property for residential mixed-use consisting of condominiums, commercial, retail and public use facilities. Paragraph 17 D (x) of the CD specifies that a temporary cap will be required as part of the remedial action prior to public access or occupancy on the site.

EPA will review *Point Ruston's* phased remediation, development and occupancy approach during the remedial design phase, during preparation of construction documents for remedial action, and during onsite remediation and development construction with oversight personnel. Paragraph 17J 30c of the CD provides that *Point Ruston* may submit design addenda for the remedial action to be performed in phases.

"Each design addendum shall include a description of the work to be performed including applicable Performance Standards, construction quality assurance standards, and plans and specifications. The addendum must include detailed information on how the Phase will be integrated with adjacent Phases. Approval of the addenda shall be within the discretion of EPA. In determining whether or not to approve the design addendum for a particular Phase EPA shall consider:

- Whether the addendum is consistent with the RODs (Record of Decisions), and the SOW (Statement of Work);
- Whether the addendum provides adequate protections regarding all other portions of the Site;
- Whether the proposed addendum is consistent with an orderly, integrated and efficient implementation of the Remedial Action as a whole;
- The number and nature of Phases already approved;
- *Point Ruston's* compliance with the terms of the Second Amendment and its prior performance of Work; and
- Any other factor related to the effective achievement of the Performance Standards or other goals of the Consent Decree as modified by this Second Amendment."

Additionally, Paragraph 17K 31b of the Second Amendment to the Consent Decree requires that *Point Ruston* prepare a Construction Management Plan (CMP) for each phase of the remedial action unless phases are being construction concurrently in which case one CMP may cover more than one phase. Approval of the CMPs will be at the discretion of EPA and again EPA will consider whether the phase is consistent with the RODs and SOW and whether the phase as proposed provides adequate protections regarding all other portions of the site.

Point Ruston is currently working with EPA on overall remediation plans for the site. ASARCO's plans for the cap included a soil cap over most of the site. *Point Ruston* will be incorporating hard surfaces into the design for EPA approval as discussed in Section 2.2 of the Statement of Work (SOW), attachment F to the CD. Section 2.9.1 of the SOW includes a discussion of the plans and documents that are in addition to the design documents and describe how the remedial action will be conducted. These plans include Sampling and Analysis Plans, a Construction Health and Safety Plan that includes the Air Monitoring Plan for the site, Fire Protection Plans and Operations and Maintenance Plans. Section 2.9.2 discusses integrating remediation with land use plans and states "Point Ruston shall develop an enforceable program of private restrictions and guidelines to supplement the actual remediation activities. Section

2.9.2 addresses dust control requirements and measures. Section 2.11 Sequencing of Development and Occupancy requires, "Point Ruston shall submit a plan for EPA approval describing the sequence for completion of the elements of the remedial action and plans for Smelter Site development and occupancy. The purpose of this plan is to allow for the development of the property before the completion of Smelter Site capping, while ensuring that ongoing construction activities will not create a health hazard for future occupants of the property."

Point Ruston is currently working with EPA on preparation of construction plans for the site to incorporate development construction and occupancy. Hard surfaces are proposed for much of the site cap including the public promenade and roadways. Design specifications for these surfaces would be reviewed and approved by EPA prior to construction. Many discussions have already taken place regarding phased development and ensuring that work on the site following occupancy of the first building is protective of residents and recreational users. Several options to be employed as protective measures during construction have been discussed and are being considered. Following completion of the first building, most of the site would remain fenced. During construction of subsequent buildings and public amenities, protective measures that have been discussed include: fencing, large wind screens, tents, dust suppression and control agents (including misters, sprays, and tacifiers); additional air monitoring and testing, and temporary capping. EPA oversight personnel would have access to the project at all times to assess construction compliance and implementation of mitigation measures.

As development progresses, areas of the site would only be opened for public use and enjoyment following EPA approval. The promenade would not be opened until required shoreline remediation is completed.

The utilization of BuiltGreen™ and Energy Star development and construction techniques and certification under these programs of eligible aspects of the development and new building construction will also mitigate the impacts of the project on environmental health including its contribution to green house gas emissions.

3.4.5 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts are anticipated.

3.5 Public Parks, Recreation and Open Space

The following section describes the existing parks, recreation, and open space amenities within the vicinity of the *Point Ruston* project and evaluates the impacts of added demand from development under the *Proposed Action* and the *No Action Alternative*.

3.5.1 Affected Environment

Public parks, recreation and open spaces within the vicinity (within 2 miles) of the *Point Ruston* project are owned and/or operated by Metro Parks Tacoma (MPT), the Tacoma School District, City of Tacoma, or the Town of Ruston.

Existing public park and recreation include parks, trails, walkways, playgrounds, improved school sites, bikeways, gulches, steep slopes, waterfront esplanades/boardwalks, the Point Defiance Zoo & Aquarium, and other areas.

- The Metro Parks Tacoma currently owns and or operates approximately 75 parks, covering approximately 2,798 acres.
- The Tacoma School District operates more than fifty school sites throughout the city, offering recreational opportunities including playground equipment, athletic fields and gymnasiums. Some of these facilities are available for general public recreational use during non-school hours through the joint MPT/Tacoma School District Interlocal Agreement, wherein both entities have agreed to cooperatively make their respective buildings and grounds available for use to each other.¹
- The City of Tacoma owns public and open space areas throughout the City, including urban public gathering spots in the downtown area, waterfront parks, and nature areas.
- The Town of Ruston owns and operates one park within its jurisdiction, Rust Park, a grass playfield providing recreational opportunity.

Park, recreational and open space existing within two miles of the site, providing both active and passive recreational opportunities, are shown in **Table 3.5.1**.

City of Tacoma

Within the jurisdiction of the City of Tacoma, the MPT operates two major regional parks, which border the Point Ruston property. To the south of the *Point Ruston* site, the City of Tacoma owns, and in conjunction with the MPT, operates the Ruston Way public park system,² which consists of a public esplanade of approximately two miles in length that joins with the Point Ruston property, offering paved walkways, picnic tables and grills, grassy play areas, a fishing pier, boat dock, beach access, and a kayak/canoe ramp. Currently, the Ruston Way Park's paved walkway dead-ends at the southern border of the Point Ruston property. To the north of the *Point Ruston* site is Point Defiance Park, a 702-acre regional park that attracts upwards of two million visitors each year. Contiguous to the northern-end of the *Point Ruston* property is the MPT-owned Peninsula Park site, which has undergone a Preliminary Design Plan for

¹ MPT/Tacoma School District Agreement,
<http://www.metroparkstacoma.org/files/library/cc05f63ebb704367.pdf>

² The Ruston Way Park consists of seven smaller parks including Cummings Park, Marine Park, the Les Davis Pier, Dickman Mill Park, Hamilton Park, Old Town Dock, and Jack Hyde Park.

creating a public recreation use.³ However, in November 2007, the Peninsula Park project was cancelled. Activities on the site are currently limited to MPT monitoring of environmental remediation required under EPA Consent Decree. Currently, there is no direct pedestrian, bicycle, or vehicle connection to Peninsula Park or Point Defiance Park from Ruston Way.

**Table 3.5.1
EXISTING PARKS/RECREATIONAL FACILITIES
IN POINT RUSTON SITE VICINITY
IN THE CITY OF TACOMA**

Park & Rec. Facility	Size in acres/ Class	Type/Facilities/Use (Within 2 Miles of Site)
Point Defiance Park	702 Regional Park ⁴	Hiking, Walking, Running, Tennis, Grassy Open Fields, Public Rental Amenities, Gardens, Boathouse Marina, Fort Nisqually, Owen Beach, Go-Karts, Batting Cages, Restaurant, Logging Museum, Zoo & Aquarium, et al.
▪ Fort Nisqually Living History Museum (inside Point Defiance Park)	N/A	Restored Hudson's Bay Company Trading Post,
▪ Point Defiance Zoo & Aquarium	N/A	Zoo & Aquarium covering 29 acres, offering 792 animals , 98 different species
Ruston Way Waterfront parks*	45 Regional Park	Panoramic views of Commencement Bay, Vashon Island, the Olympic Mountains and Northeast Tacoma greet visitors to Ruston Way. The two-mile long scenic waterfront is a great place for walking, jogging or rollerblading. Fishing enthusiasts can find a place to drop their lines at the Les Davis pier. Public art projects add interest to a walk down Ruston Way, where you'll also find several restaurants.
▪ Jack Hyde Park*	-	Plaza and grassy area, view
▪ Old Town Dock*	-	Dock, Benches, covered, fishing
▪ Dickman Mill Park*	-	Beach Access, Boat Launch, Historical Structure, Parking Stalls, Restrooms, Trail - Multipurpose Asphalt Concrete or Other Surface, Open Space
▪ Hamilton Park*	-	Picnic tables, water fountains, access to Silver Cloud Inn public dock
▪ Les Davis Pier*	-	Beach Access, Fishing Pier/Dock/Platform, Food Picnic Tables, Restrooms, Trail, Concessions
▪ Marine Park*	-	Artwork, Beach Access, Beach Access, Fishing Pier/Dock/Platform, Parking Spaces, Picnic Tables, Restrooms, Trail
▪ Cummings Park*	-	Garden area (30 foot diameter flower bed/rock garden)

³ See <http://www.metroparkstacoma.org/page.php?id=757>

⁴ A Regional Park, as defined by MPT, provides "visitors with access to unique features and attractions that will attract visitors from the entire District and beyond. Regional parks often accommodate large group activities and have infrastructure to support special events and festivals. Promoting tourism and economic development, regional parks can enhance the economic vitality and identity of the entire region."

<http://www.metroparkstacoma.org/files/library/fcdb74685a2142be.pdf>

* Part of the Ruston Way Waterfront park system

Park & Rec. Facility	Size in acres/ Class	Type/Facilities/Use (Within 2 Miles of Site)
Jane Clark Park	6.43 Neighborhood ⁵	Baseball/Softball Field, Basketball, Parking, Playground, Wading Pools, Restrooms, Trail
Baltimore Park	2.68 Neighborhood	
Proctor Community Garden	.68 Community Garden ⁶	The Community Garden program provides gardening opportunities for the physical and social benefit of the people and neighborhoods of Tacoma.
Kandle Park	10.98 Community Park ⁷	Baseball/Softball Field, Basketball Court, Community Garden, Parking Spaces Picnic Tables, Playground, Wading Pools, Restrooms Soccer Field, Tennis Court, Trail, Wildlife Habitat/Open Space
Vassault Park	17.56 Community Park	Baseball/Softball Field, Basketball Court, Parking Spaces, Picnic Tables, Playground, Restrooms, Soccer Field, Tennis Court, Trail
Baltimore Park	2.68 Neighborhood Park	Baseball/Softball Field, Basketball Court, Grill, Gravel Path, Picnic Tables, Playground
Jefferson Park	14.92 Community Park	Baseball/Softball Field, Basketball Court, Playground, Restrooms, Soccer Field, Tennis Court, Trail
Old Town Park	1.38 Neighborhood Park	Art Work/Heritage Monument, Basketball Court, Picnic Shelters w/ Cooking, Picnic Tables, Playground, Trail
Puget Park	1.22 Neighborhood Park	Parking Spaces, Playground, Trail

Source: Metro Parks Tacoma, see <http://www.metroparkstacoma.org/page.php?id=19>.

In addition to municipally owned park and recreation facilities, a number of Tacoma School District schools in the vicinity of *Point Ruston* contain recreational facilities including sports fields, basketball courts, open space areas, gymnasiums, and other recreational amenities. Schools within the *Point Ruston* site vicinity include Point Defiance Elementary, Truman Middle School, Skyline Elementary, Downing Elementary, Jefferson Elementary, Lowell Elementary, Sherman Elementary, Washington-Hoyt Elementary, Mason Middle School, and Wilson High School.

⁵ A *Neighborhood Park*, as defined by MPT, provides “daily convenient access to basic recreation opportunities for nearby residents living within a ¼-mile radius (roughly a 10-15 minute walking distance) of the park. Generally small in size, neighborhood parks are designed primarily for spontaneous, non-organized recreation activities. Neighborhood parks should be designed to enhance neighborhood identity, preserve neighborhood open space, improve the quality of life of nearby residents and encourage users by foot or bicycle. Generally speaking, programmed activities are not encouraged to take place in neighborhood parks.” <http://www.metroparkstacoma.org/files/library/fcdb74685a2142be.pdf>

⁶ A *Community Garden* is a garden plot, mainly located within existing parks with the exception of Proctor Garden, that is intended to provide residents of the City who do not have lawn and garden space an area to plant seasonal flowers, fruits and vegetables. MPT staff tills the soil at the beginning of each session and provide water. A nominal fee is charged for each plot.

⁷ A *Community Park*, as defined by MPT, (including signature community parks) provides “a variety of major recreation facilities and support recreation programming and large group activities for residents living within a 1.5-mile radius of the park. Community parks are designed to enhance neighborhood and community identity, preserve open space and enhance the quality of life of community residents. Because of the wide range of amenities provided in community parks, many users visit the park by car and stay for a few hours. For this reason, they require support facilities such as parking and restrooms. Signature community parks have a wider community appeal and often contribute to the identity of each planning area.” foot or bicycle. Generally speaking, programmed activities are not encouraged to take place in neighborhood parks.” <http://www.metroparkstacoma.org/files/library/fcdb74685a2142be.pdf>

Town of Ruston

The Town of Ruston operates one park within its jurisdiction. Rust Park contains a grassy field, restroom facility, and baseball backstop.

Table 3.5.2
EXISTING PARKS/RECREATIONAL FACILITIES
IN POINT RUSTON SITE VICINITY
IN THE TOWN OF RUSTON

Park & Rec. Facility	Acres	Type/Facilities/Use	Within 2 Miles of Site
Rust Park	N/A	Grassy, open, playfield with baseball backstop	

Source: *Point Ruston, LLC*

No park and recreation facilities are presently located on the *Point Ruston* site. Currently the site is undergoing environmental remediation under the direction of a Consent Decree between Point Ruston, LLC., and the Environmental Protection Agency. The site was originally utilized for a copper smelter operation and has subsequently been under the jurisdiction of EPA and CERCLA/Superfund for environmental remediation; thus, no parks, open space, shoreline access or recreational opportunities currently exist or have existed on the property for over 100 years.

3.5.1.1 Parks Level of Service Guidelines

The three contiguous jurisdictions to the *Point Ruston* property (Town Of Ruston, City of Tacoma, and the MPT) each have unique Levels of Service (LOS) required to meet the basic recreational needs of the community.

City of Tacoma

In 2006, the City and MPT collaborated to update the Recreation and Open Space Facilities Element of the *Comprehensive Plan*. The *Comprehensive Plan* describes existing park and recreation facilities and services within the Tacoma area and analyzes the supply, demand and need for additional public and private park and recreation facilities, along with financial implications and conceptual development plan elements for park, recreation and open space land and activities. The Plan also identifies open space and recreational Level of Service (LOS) requirements. The adopted LOS for recreation and open space, in accordance to the Plan, are as follows:

- Regional Parks: 7 acres per 1,000 persons;
- Local Parks..... 3 acres per 1,000 persons; and
- Open Space 2 acres per 1,000 persons.⁸

⁸ Strategic Parks and Services Plan, Metropolitan Parks Tacoma, October 2003.
<http://www.metroparkstacoma.org/files/library/f2db297b990c4508.pdf>

The City of Tacoma LOS guidelines represent overall levels of facilities that the City and MPT seek to achieve on a citywide basis and are not intended to be implemented on a project-specific basis.

The *Point Ruston* site is within the City of Tacoma's West End Neighborhood. This Neighborhood has a population of 28,210 and approximately 155 acres of Neighborhood parks, for an LOS of 5.1.⁹

Metropolitan Parks of Tacoma

The 2006 *Metro Parks Tacoma Strategic Plan* adopts the use of service radius as the park LOS, rather than using a per capita LOS. The intent is to ensure that residents have equal and convenient access to all neighborhood and community parks. The service radii LOS for Neighborhood Parks is 0.75 miles and 1.5 miles for Community Parks.

The *Point Ruston* site is within the MPT's Northwest Planning Area. Forty-nine percent of MPT's total parks are located within this Planning Area, for a total of 33 parks including over 1,103 acres.

Town of Ruston

The Town of Ruston's *Comprehensive Plan* requires that development of the *Point Ruston* property within its jurisdiction occur under the guidance of a Town-approved Development Plan. A Development Plan must specify "the standards of ... open space" (Ruston Municipal Code 25.01.060). Further, the *Comprehensive Plan* states that "the final configuration of the access and related parks areas will be determined as part of the development plan for the area." Thus, upon submittal for a land use action in the Town of Ruston, *Point Ruston* shall provide a development plan articulating the specific open space, park, and recreational opportunities within the jurisdiction.

3.5.1.2 Parks Impact Mitigation Fees

Under the Growth Management Act (GMA), cities, towns and counties are authorized to impose impact fees on new development to help finance certain public facilities, including parks within their jurisdiction. Neither the City of Tacoma, the Town of Ruston nor the Metro Parks Department currently impose park impact mitigation fees.

3.5.2 Impacts of the Proposed Action

The *Point Ruston* project would include residential uses and would, therefore, increase demand for Tacoma and Ruston parks and recreation areas. The *Point Ruston* development assumes development of the entire site, with final build out comprised of 800 - 1,000 new multi-family dwelling units and 228,000 sq. ft. of commercial/retail space. Upon full build out of the *Point Ruston* development, 12 distinct park areas and over 50 acres would be publicly accessible park, recreation, or open space.

⁹ *Id.*

The *City of Tacoma Comprehensive Plan* assumes an average household ratio of 2.45 residents per dwelling unit (average across all housing types), which would translate to an on-site population of approximately 1,950 - 2,450 residents. The *Comprehensive Plan* does not provide a separate ratio for multi-family units versus single-family residents; typically, the number of residents per dwelling unit is fewer for multi-family units. A more accurate assumption for multi-family dwelling units would be 1.75 residents per unit, which would translate to an assumed *Point Ruston* development population range of 1,400 to 1,750 residents.

3.5.2.1 Construction

Since construction would be phased over time, parks and recreation facilities that are constructed on-site could experience temporary increases in dust, emissions and noise due to construction activities in the immediate area; these activities would not be anticipated to impact offsite park facilities. These impacts would be assumed to be temporary in nature and not significant.

3.5.2.2 Operations

The *Proposed Action* would feature approximately 1,298,600 square feet of total livable residential / net leasable commercial space, to be built over the 8 to 10-year construction period. This alternative would include 800 to 1,000 multifamily dwelling units with an associated onsite residential population of approximately 1,400 to 1,750 people.

Development of the proposed *Point Ruston* would create new capacity for a range of retail, commercial and residential uses along with associated employment and population. Increases in employment and population on the site over the 8 to 10-year build-out period would create related increases in demand for public recreational opportunities. These indirect impacts would not be assumed to be significant.

The *Proposed Action* would provide substantially increased recreational and open space opportunities on the site in the form of new public parks, trails, and waterfront access. Under the *Proposed Action*, approximately 50 acres of parks and open space is proposed, in 12 distinct park and recreation areas. It would be assumed that by 2018 the *Point Ruston* site would include a myriad of public and private recreation opportunities, including public parks, private health clubs, over 9 acres of Promenade, as well as assorted other pocket parks. In total, 26 acres of parks and recreational opportunities are assumed within that portion of the site located in the City of Tacoma and 24 acres are assumed in that portion of the site located within the Town of Ruston. **Table 3.5.3** provides a detailed breakdown of the proposed public parks, trails and habitat restoration areas assumed under the *Proposed Action*. For the location of proposed parks, recreation, and open space areas provided under the *Proposed Action*, please refer to **Figure 10**.

Table 3.5.3
POINT RUSTON PROPOSED PARKS, RECREATION AND OPEN SPACE AREA

Label on Figure 10	Jurisdiction (Tacoma or Ruston)	Park Feature	Description
A	Tacoma/Ruston	Point Ruston Promenade	The promenade at Point Ruston is proposed to run from the southern tip of the property along the entirety of the shoreline to the most northern point of the property, covering approximately 4800 lineal feet. The Promenade would connect to the existing Ruston Way public walkway within the City of Tacoma and extend almost $\frac{3}{4}$ mile with an average 100' width. The promenade would be composed of several surfaces, including continuous hardscape and sand-type, and contain public art, fountains, kiosks, and other public attractions. At several locations along the promenade, the walkway would be widened beyond its average width into public gathering areas, which would include public art amenities, public seating, pedestrian lighting,
B	Tacoma	Ruston Way Park Connection	The existing Ruston way walkway terminates approximately 700' south of the View Point Park District within Tract A. The promenade would extend along Tract A to connect to the existing City owned walkway providing pedestrian access to the entirety of the <i>Point Ruston</i> shoreline.
C	Tacoma	Point Ruston View Point Park	The South East end of the Point Ruston development would feature an expanded section of the Promenade to accent the view towards the City, Mt. Rainier, and the Port. Measuring approximately 20,000 in total square feet, this area would act as a central gathering place for persons accessing the Promenade from the Tacoma end of the property, as well as feature a focal piece of public art.
D, F, H	Tacoma	Island, Bay & Mountain View Corridors	View corridors are assumed under the <i>Proposed Action</i> allowing unobstructed view from Ruston Way to the shoreline and beyond. These corridors would allow public access from Ruston Way, through the <i>Point Ruston</i> development, allowing pedestrian access to the Promenade. The view corridors average 75 ft. in width.
E	Tacoma	Bear Fountain Public Art	The Bear Fountain is proposed to be a highly stylized piece of art, combining marble, glass, copper, and water aspects. Figure 18 (Section II of this DSEIS)
I	Tacoma/Ruston	Grand Promenade Plaza	The <i>Proposed Action</i> assumes that the midpoint of the Promenade would open to the raised Grand Promenade Plaza, which would be a highly styled public gathering area, with central fountain, public seating areas, view terraces of the Promenade, near-shore/far-shore views of Commencement Bay, as well as access to the Promenade District hotel, commercial, restaurant, and retail core area.
G	Tacoma/Ruston	Roundabout Open Spaces	The <i>Proposed Actions</i> assume the realignment of Ruston Way to circumvent the existing Ruston Way/51 st St. Tunnel so as to provide a more accessible and safer roadway. Ruston Way would be straightened, providing three entrance points into the <i>Point Ruston development</i> . Both entrances would have roundabouts to aid in the proper flow of traffic in and out of the development. The southern roundabout is

Label on Figure 10	Jurisdiction (Tacoma or Ruston)	Park Feature	Description
			proposed to be centered on the Promenade District, providing adequate flow in and out of the retail/commercial core. The northerly roundabout would aid in the ingress/egress generated by the Yacht Club Rd/51 st St./Baltimore St. interchange. These roundabouts would provide more efficient flow for traffic generated by <i>Point Ruston</i> ¹⁰ . The roundabouts would also provide green open space rain garden areas within their central islands.
J	Tacoma/Ruston	Ruston/Tacoma Signage	Highly stylized signage indicating the jurisdictional boundary along the Promenade will be an integral public art amenity along the Promenade.
K	Ruston	Pedestrian Connection to Metro Parks Property	A public right of way is assumed which would connect Ruston Way to the Yacht Club basin, allowing for access to the MPT Peninsula Park and Point Defiance Park, through the Point Ruston development. Under the 2 nd Amendment to the Consent Decree, Point Ruston has agreed to environmentally remediate the Metro Park's Peninsula Park property. No park or open spaces features are assumed for this site at this time. Please refer to Figure 20 for a graphical illustration of the elevation of the grade interaction between N. Waterfront Road, Yacht Club Road, and the pedestrian connection to Metro Parks' Peninsulas Park property. The grade current grade difference is resolved by dropping the road before the T-intersection, thus using the building foundation as a retaining wall.
L	Ruston	Promontory Hill Park	The portion of this area that belongs to Point Ruston is envisioned as present open space and future recreational uses, to be consistent with the property's status as an On-Site Containment Facility (OCF), for which Maintenance and Operation will be a continuous and ongoing endeavor. Promontory Hill is envisioned as a future park on a level similar to MTP LOS for a "Neighborhood Park". Promontory Hill will be dedicated as park open space, allowing for a children's play area, large open field, picnic shelters, interpretive signage, open grass field suitable for a sports field, along with other general site enhancements.

Source: Point Ruston, LLC

Note: Park and trail names are for descriptive purposes and would likely be amended in the future.

As part of the definition of the *Proposed Action*, the general size and location of the various public park, recreation, and open space components have been identified. However, the specific features that would be provided, and the design, layout and configuration of the onsite public parks and trails have not been determined at this stage. For the purposes of this FSEIS, it is assumed that a variety of park and recreational opportunities would be afforded, including both active and passive opportunities, and will be designed in partnership with Metro Parks.

The provision of 50 acres of public park and recreational amenities within the *Point Ruston* development would create areas for the public to be able to enjoy a wide array of activities,

¹⁰ <http://www.wsdot.wa.gov/Projects/roundabouts/benefits.htm>. "Studies by Kansas State University <http://www.ksu.edu/roundabouts/> have measured traffic flow at intersections before and after conversion to roundabouts. In each case, installing a roundabout led to a 20 percent reduction in delays. The proportion of vehicles that had to stop – just long enough for a gap in traffic – was also reduced."

including: running, walking & jogging, roller-blading, biking, skate boarding and other wheeled activities, lounging in large open landscaped and garden areas, viewing public art amenities, picnic tables, benches, and other public resting amenities, picnicking, and Commencement Bay viewing. Parks and open spaces would provide recreational opportunities for the public at large as well as members of the *Point Ruston* neighborhood. Public open space would also provide new pedestrian, bike, and automotive connections between the existing Ruston Way waterfront to the south and the MPT Peninsula Park property and Point Defiance Park.

3.5.2.3 Point Ruston Promenade

The *Point Ruston* promenade is planned to be developed along the shoreline of the entire property. It is planned to span from the southern tip of the property and extend to the most northern point, spanning approximately 4,800 lineal feet and averaging a 100-foot width along the entirety of the shoreline frontage of the property, across the jurisdiction line between Tacoma and Ruston.

The promenade would connect to the existing Ruston Way public walkway within the City of Tacoma and extend almost 0.75 miles along the shore of Commencement Bay and the entire shoreline frontage of the *Point Ruston* property. The promenade would be composed of several surfaces, including continuous hardscape and a meandering sand-type substrate. The multiple surfaces of the promenade would provide active play and recreation areas along the entirety of the shoreline of the developed area of *Point Ruston* for runners, bikers, walkers, strollers, etc. The promenade would feature public art, fountains, and public seating amenities, kiosks, play areas, rest areas, as well as other public attractions. Other potential improvements could include landscape plantings, open play field areas, parking improvements, sidewalks, lighting, interpretive signs, park benches, fountains, outdoor fire pits and other public amenities.

At several locations along the promenade, it is envisioned that public gathering areas would be provided, which could include public art amenities, public seating, and pedestrian lighting (see Figure 18, *Section II* of this FSEIS). Pedestrian and bicycle connections from the existing Ruston Way promenade to the *Point Ruston* promenade would also be provided. The promenade is anticipated to seamlessly link with the existing Ruston Way walkway, providing a public park element that the users will find as an attractive place to recreate. In areas where public and private property boundaries meet, a distinct separation would be provided to ensure public access to the promenade while privacy and security is maintained for residents of Point Ruston. All buildings with frontage on the promenade would be of a mixed-use nature.

The promenade is proposed to also provide an automotive and pedestrian connection between the *Point Ruston* site, Point Defiance Park and future MPT projects at Peninsula Park. Public vehicular access along the proposed Yacht Club Road would also provide a connection through the *Point Ruston* site Metro Parks property including Peninsula Park and Point Defiance.

In addition, private parks/open spaces, courtyards, playgrounds, seating areas, indoor gyms/pools and recreational facilities for children living on-site could be developed in conjunction with the development of the residential and commercial buildings on-site. These private spaces and facilities may add to the park and recreation amenities on the site; however, specific details on these areas cannot be determined until future redevelopment occurs.

As a separate endeavor, Point Ruston, LLC, also plans to coordinate with the Department of Natural Resources to secure State funding to remove dilapidated structures along the shoreline,

such as existing piers and creosote piles. This future work would be subject to a separate environmental review and permitting process.

3.5.2.4 Park Construction – Phased Approach

Throughout the phased build out of *Point Ruston*, parks and open space would be constructed in coordination with the construction of the buildings, as well as in coordination with the capping and final environmental remediation. Pedestrian walkways, gardens, paths, and view corridors would all be constructed as frontage improvements to the individual buildings. The promenade would be built in coordination with the development of the shoreline zone, phased so as to start with construction on the south of the *Point Ruston* site, and ending with a final connection to the MPT's Peninsula Park at the north. Because the promenade is primarily hardscape, the completion of this aspect of the project would not only serve to meet zoning requirements for public shoreline access but also acts as conformance with the EPA Consent Decree for final environmental remediation of the site.

As noted in *Section II* of this FSEIS, the first building to be constructed on the *Point Ruston* site would be located within the City of Tacoma. It would be of a commercial nature, located within the upland zone of the site, with no residential uses. This building would produce no new residents so as to trigger any park/open space LOS requirements. Further construction of buildings throughout the *Point Ruston* development, however, would generate LOS requirements, and the proposed park, recreation, and open space opportunities that are proposed by the development would exceed City and MTP requirements for park LOS.

3.5.2.5 Demand on Existing Park Facilities

Increases in on-site population due to permanent residents, as well as on-site employees of the mixed-use development, would increase demands on local and regional parks and recreation facilities on an incremental basis throughout the occupancy of the *Point Ruston* development. Increases in resident and employee population on the site could result in additional demand for both passive and active recreational facilities. Passive recreational facilities most likely to receive increased demand would include facilities near the site, such as: Ruston Way waterfront and park and Point Defiance Park.

Given the variety and size of passive recreational facilities located within two-miles of the site, increases in use would likely be distributed among numerous nearby parks and trails, and would not be expected to be significant. Based on the new Promenade connections to/from the site, additional use of offsite trails, such as the Ruston Way walkway and trail system at Point Defiance, would likely result. The proposed onsite recreational facilities that would be constructed including public plazas, courtyards and outdoor seating areas located in conjunction with onsite buildings, and private parks/open space associated with these buildings, would also help to meet the demand for passive recreational space from redevelopment.

Demand for active recreational facilities, such as: baseball and soccer fields, tennis and basketball courts, wading pools, boat launches, and trails, would also increase under the Proposed Actions. The most likely facilities to experience added use would include facilities near the site, such as: Point Defiance tennis courts and jogging paths and the Ruston Way walkway. Given the variety of active recreational opportunities within one to two-miles of the site, increases in use would likely be distributed among the numerous nearby parks and would

not be expected to be significant. In addition, public parks, trails and recreational facilities proposed onsite by 2018 would also help to meet the increased demand for active recreational facilities from residents and employees onsite.

At full build-out it is anticipated that approximately 1,400 to 1,750 people will become permanent residents at *Point Ruston*. The proposal potentially creates 651 on-going on-site jobs as well. LOS quantitative guidelines are based on permanent residents in the vicinity.

That portion of the *Proposed Action* that would be located within City of Tacoma is anticipated to contain approximately 775 residential units, with 1,356 full time residents. In addition, approximately 333 on-site employees are anticipated.

With a total of 12 park areas proposed throughout the entirety of the property, in addition to the two existing Regional Parks within the vicinity of the *Proposed Action* and the 10 community and neighborhood parks, both the MPT LOS guidelines and City of Tacoma LOS guidelines would be greatly exceeded. Under the City of Tacoma's *Comprehensive Plan* Park LOS guidelines, approximately 9.45 acres of regional parks, 4.05 acres of neighborhood parks, and 2.7 acres of open space would be recommended for the *Proposed Action* – for a total of 16.2 acres. As noted previously, the *Point Ruston* development would provide 26 acres of park, recreation and open space -- within the City of Tacoma jurisdiction, thereby exceeding the amount recommended by nearly 61 percent.

That portion of the *Proposed Action* that would be located within the Town of Ruston is anticipated to contain 225 residential units and generate approximately 393 permanent residents. An additional 318 on-site employees are anticipated, as well. The Town of Ruston zoning code requires an approved Development Plan include open space elements of the proposed project. The *Proposed Action* would meet this requirement.

3.5.3 Impacts of the No Action Alternative

The 1997 *Master Development Plan EIS* (1997 EIS) assumed no residential uses on the project site; therefore, no direct LOS impacts on existing area parks were assumed. It was also assumed that the increase in employment opportunities provided on-site would indirectly contribute to general population growth and increases in demand for recreational areas near the site and increase usage of nearby park and recreational areas. It was also noted that the additional development proposed in the 1997 EIS would increase air quality, noise and traffic impacts relative to existing park users. These impacts were determined to not be significant.

Park and open space improvements were supported through the ASARCO redevelopment planning process, as described and depicted in the 1997 EIS. The 1997 EIS was prepared based on the Plan Definition Report and the Definitive Agreement between ASARCO, the Town of Ruston, the City of Tacoma and the MPT. The 1997 EIS outlined the basic design program for the project and described the roles and responsibilities of the Stakeholders. Section A1.3 of the MDP explains that the 1997 EIS alternatives were based on the Plan Definition Report, Definitive Agreement and public input received during the Scoping process associated with that EIS.

The park, recreation and open space assumptions used as the baseline for the 1997 EIS were developed and approved in 1997 as a component of a Definitive Agreement between ASARCO, the Town of Ruston, the City of Tacoma and the Metropolitan Park District of Tacoma for

environmental remediation of historical contamination on the site. The Definitive Agreement described the quantity and arrangement of parks and recreation amenities provided on and offsite of the MDP. The Definitive Agreement also defined the responsibilities of each signatory in regards to provision of amenities, financing, maintenance, etc. The Definitive Agreement assumed a total of 53 acres (on- and off-site of the MDP) would be dedicated to park and recreation features.

Off-site improvements were to be completed on property owned by the MPT. Park development outside the boundaries of the project property was required under the terms of the Definitive Agreement, entered into by Asarco, MPT, Town of Ruston, and the City of Tacoma.

The 1997 EIS describes park and open space improvements as being funded in three distinct ways:

- Park and Open Space Improvements to be provided by ASARCO as Part of Remediation -- These basic park improvements completed as part of remediation are described in section C.2 of the MDP (e.g., capped vegetated areas, landscape plantings to control erosion, pathways and walks).
- Park and Open Space Improvements that may be Funded through Metropolitan Parks District of Tacoma Funds as a Result of the Definitive Agreement -- ASARCO paid the Metropolitan Park District of Tacoma \$2,500,000.00 as agreed to assist in funding of improvements in the project's Park Tracts as described in MDP section C1.2.
- Park and Open Space Improvements for Which Additional Funding is Required -- Section C4 of the MDP describes additional funding opportunities that should be pursued by the stakeholders including:
 - Funding from Private Developers. "To a limited extent, private parties may have an interest in participating in development on Park Tracts where it is complementary to their projects."
 - Interagency Committee for Outdoor Recreation (IAC). IAC administers publicly funded grant programs to help finance recreation and conservation projects throughout the state.
 - Municipal Financing Options

The 1997 EIS indicated that existing park facilities would not be directly affected by construction activities on the site but could be indirectly affected by construction-related activities and traffic congestion, road closures or road alterations. These impacts were determined to be temporary and not significant.

The 1997 EIS indicated that thirteen main park components would be employed under the *Master Development Plan*. Under the MDP, anticipated park development occurred in areas both within the real property boundaries of the Site, and outside said property boundaries. The parks and recreational areas planned to be developed on-site included the Viewpoint Park located at the far south-end of the project site, the South Shore Promenade, various publicly accessible view corridors located throughout the property, the Crescent Park, an artistic

Roundabout feature on Ruston Way, and the Bennett Street Promontory. Off-site park and recreational improvements included the Boat Basin View Corridor, Peninsula Park, Breakwater Marina and Promenade, and a Public Boat Ramp Improvement project.

Since the adoption of the EIS for the MDP in 1997, political, legal, and physical changes have occurred, requiring some changes to the off-site plans. In 2005, ASARCO filed for bankruptcy and they were unable to meet their full financial commitments detailed in the Definitive Agreement. In 2006, Point Ruston LLC purchased the property. As part of the purchase and sale agreement, the Definitive Agreement was nullified and ASARCO's legal commitments to provide the array of parks, recreation and open space analyzed in the 1997 EIS were released.

In particular, the sale of property and vacations of Bennett Street by the Town of Ruston to allow for the construction of the Commencement Condominium project has precluded expansion of Promontory Park across Bennett Street and into the lower lot of the former Ruston School as shown on page C-20 of the 1997 EIS. In addition, negotiations for the coordinated construction of the Peninsula Park project were underway until September of 2007, when the Metropolitan Parks Commission rejected a plan for partnership between Point Ruston, LLC and MPT for construction of an amphitheater and esplanade improvements.

Park features proposed in the original Definitive Agreement were analyzed in the MDP EIS; these impacts are the *No Action Alternative* that is described in this FSEIS. Park-related features associated with the MDP included a waterside promenade and an array of hardscape plazas along the length of the project shoreline, which would connect to the existing Ruston Way walkway. Large open spaces could include active play areas for children and adults were planned between buildings, which would maintain a park-like atmosphere within the development and provide multiple pedestrian and bike connections from roads to the promenade.

As described in the 1997 EIS, the promenade was planned to be 25 feet in width with a larger, wider section in the central waterfront of the proposed development. At the northeastern corner of the property, a connection would be provided to the Point Defiance and Peninsula Park. The promenade and multiple plazas provided adjacent to retail and commercial areas would remain public open space for recreational activities. **Table 3.5.4** provides a breakdown of the public parks, recreation and open space areas provided under the *No Action Alternative*; also refer to **Figure 19**.

Table 3.5.4
NO ACTION ALTERNATIVE
ASARCO MASTER DEVELOPMENT PLAN PARK TRACTS

Label on Figure 19	Jurisdiction (Tacoma or Ruston)	Park Feature	Description
A	Tacoma	Viewpoint Park	1. Promenade Enhancements 2. View Terrace 3. Beach Access
B	Tacoma/Ruston	South Shore Promenade	1. Promenade Enhancements 2. Beach Access 3. Development Related

Label on Figure 19	Jurisdiction (Tacoma or Ruston)	Park Feature	Description
			Promenade Improvements 4. Ore Dock Promenade Connections
C, D	Tacoma/Ruston	View Corridors	1. Walkway Enhancements 2. Pedestrians Connections
E	Tacoma/Ruston	Crescent Park	1. Promenade Enhancements 2. Shoreline Enhancements 3. Roundabout View Plaza 4. Restroom Building 5. Peninsula Park Entry Plaza 6. Promenade Dock Access (Ore and Copper Docks)
F		Roundabout	1. Ruston Way Monument 2. Ruston Entry Floral Display 3. Cooling Pond
G	Tacoma	Boat Basis View Corridor	1. Yacht Club Entry Gate 2. Yacht Club Screen Fence
H	Tacoma	Peninsula Park	1. Public Comfort Station 2. Promenade Enhancements 3. Events Facility 4. Special Features 5. Children's Play Area 6. Fishing Pier 7. Shoreline Enhancements
J	Tacoma	Breakwater Marina and Promenade	1. Point Defiance Park Connection 2. Sea Wall Replacement 3. Short term moorage expansion 4. Marina Parking Expansion 5. Relocate Fuel Dock and Marina Office 6. Replace and/or Repair Fuel Tanks and Fuel Delivery Access 7. Modify Existing Marina Office Building
M	Tacoma	Public Boat Ramp Area Improvement	1. Boat Ramp/Marina

Label on Figure 19	Jurisdiction (Tacoma or Ruston)	Park Feature	Description
			Breakwater 2. Ferry Night Moorage Slip 3. Log Boom or Guide Wall 4. Public Viewing Area Enhancements 5. Ramp, Parking, Restroom, Relocated Floats
N	Ruston	Cooling Pond Site	1. Entry Sign and Hillside
O	Ruston	Bennett Street Promontory	1. Public Garden 2. Children's Play Area 3. Pedestrian Entry to Ruston School House 4. Picnic Shelters 5. Public Restrooms 6. Sports Field 7. Park Related Parking 8. Amphitheater 9. General Site Enhancements 10. Pedestrian Connection to Tract P

Source Master Development Plan, DEIS figure 2-1 page 2-5

3.5.4 Mitigation Measures

- The *Point Ruston* development would provide 26 acres of parks and open space facilities within the City, which translates to approximately 160.5 percent more park, recreation and open space than the recommended amount (16.2 acres), based on the City of Tacoma's LOS standard. Under the City of Tacoma's *Comprehensive Plan* Park LOS guidelines, approximately 9.45 acres of regional parks, 4.05 acres of neighborhood parks, and 2.7 acres of open space would be recommended under the *Proposed Action*. *Point Ruston's* proposed 26 acres of park, recreation and open space within the City of Tacoma jurisdiction greatly exceeds these quantitative guidelines. Increases in the demand for parks and recreational facilities would be mitigated, in part, through the provision of a range of onsite public park and trail facilities. These on-site parks and facilities would include a mix of parks, trails, gathering places, view opportunities and public shoreline access. Other types of recreational facilities would likely be provided as part of the multifamily residential uses including play areas for children living at the site. It is anticipated through this provision of onsite recreational opportunities and the availability of a variety of park and recreational facilities in the nearby vicinity, significant impacts to park and recreational facilities would be adequately mitigated.
- The *Point Ruston* development would provide 24 acres of parks and open space facilities within the Town of Ruston. While Ruston does not have a quantifiable LOS requirement, however using MPT and City of Tacoma's LOS guidelines, this translates

to approximately 524 percent of the amount of acreage that conceivably could be recommended (4.58 acres) by the Town; again this estimate is based on the City of Tacoma's LOS guidelines. In light of that, based on the City of Tacoma's *Comprehensive Plan* Park LOS guidelines, approximately 2.7 acres of regional parks, 1.1 acres of neighborhood parks, and 0.78 acres of open space would be recommended under the *Proposed Action*. Thus, the *Proposed Action*'s proposed 24 acres of park, recreation and open space within the Town of Ruston jurisdiction greatly exceeds these quantitative guidelines. Increases in the demand for parks and recreational facilities would be mitigated, in part, through the provision of a range of on-site public park and trail facilities. These on-site parks and facilities would include a mix of parks, trails, gathering places, view opportunities and public shoreline access. Other types of recreational facilities would likely be provided as part of the multifamily residential uses including play areas for children living at the site. It is anticipated through this provision of onsite recreational opportunities and the availability of a variety of park and recreational facilities in the nearby vicinity, significant impacts to park and recreational facilities would be adequately mitigated.

- Appropriate measures related to temporary construction impacts (including dust, emissions and noise) would be implemented during the redevelopment of the site to preclude significant impacts on new and existing parks and trails in the site area.

3.5.5 Significant Unavoidable Adverse Impacts

With implementation of the mitigation measures listed above, no significant adverse impacts to parks and recreational facilities would be anticipated to result from the proposed *Point Ruston* development.

M - Public Boat Ramp Area Improvements

1. Boat Ramp / Marina Breakwater
2. Ferry Night Moorage Slip
3. Log Boom or Guide Wall
4. Public Viewing Area Enhancements
5. Ramp, Parking, Restroom, Relocated Floats

J - Breakwater Marina and Promenade

1. Sea Wall Replacement
2. Short Term Moorage Expansion
3. Marina Parking Expansion
4. Relocate Fuel Dock and Marina Office
5. Replace and/or Repair Marina Fuel Tanks and Fuel Delivery Access
6. Modify Existing Marina Office Building

O - Bennett Street Promontory

1. Public Garden
2. Children's Play Area
3. Marina Parking Expansion
4. Picnic Shelters
5. Public Rest Rooms
6. Sports Field
7. Park Related Parking
8. Amphitheater
9. General Site Enhancements
10. Pedestrian Connection to Tract P

H - Peninsula Park

1. Public Comfort Station
2. Promenade Enhancements
3. Events Facility
4. Special Features
5. Children's Play Area
6. Fishing Pier
7. Shoreline Enhancements

G - Boat Basin View Corridor

1. Yacht Club Entry Gate
2. Yacht Club Screen Fence and Landscaping

N - Cooling Pond Site

1. Ruston Entry Sign

F - Roundabout

1. Ruston Monument
2. Ruston Entry Floral Display

D - View Corridors

1. Walkway Enhancements
2. Pedestrian Connections

D - View Corridors

1. Walkway Enhancements
2. Pedestrian Connections

E - Crescent park

1. Promenade Enhancements
2. Shoreline Enhancements
3. Roundabout View Plaza
4. Restroom Building
5. Peninsula Key Entry Plaza
6. Promenade Dock Access - Ore Dock
7. Promenade Dock Access - Copper Dock

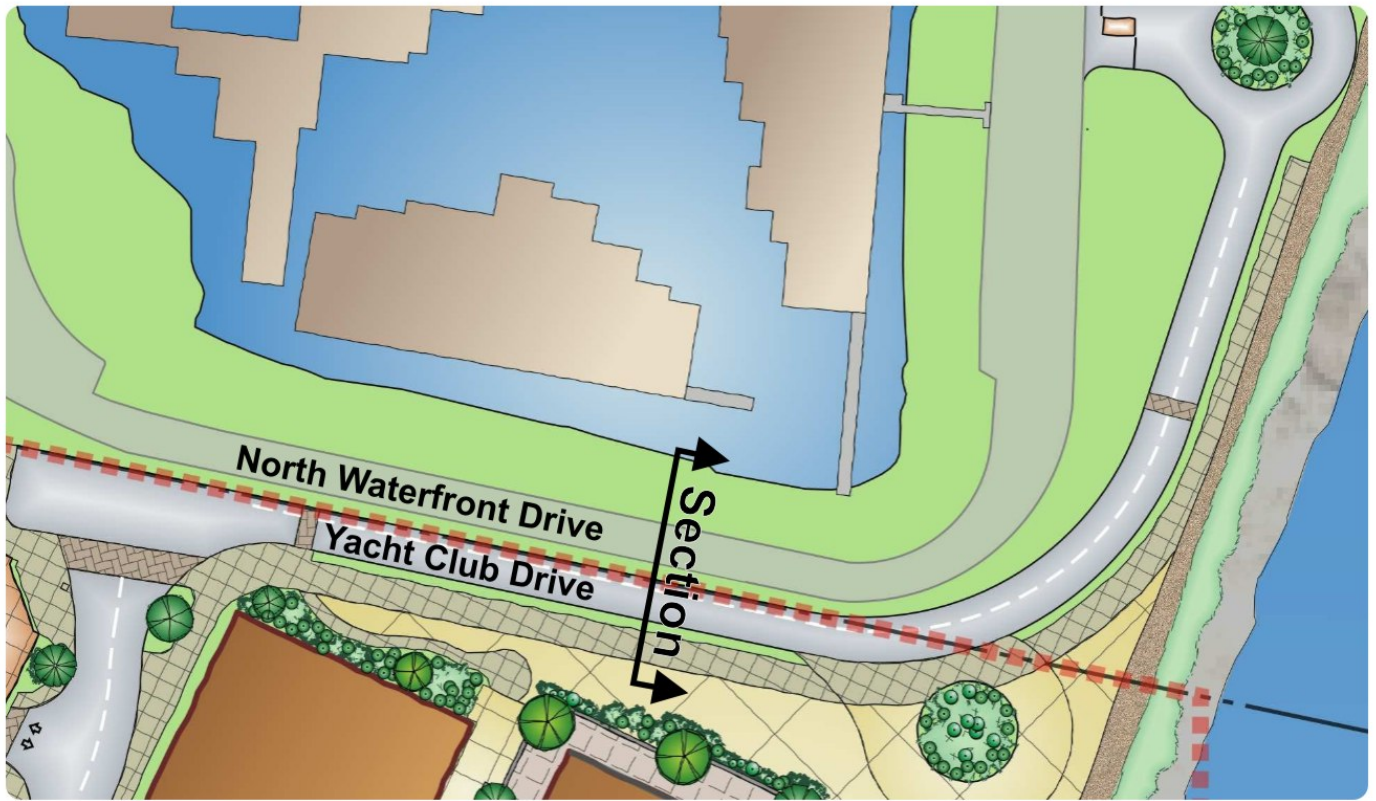
B - South Shore Promenade

1. Promenade Enhancements
2. Beach Access
3. Development-Related Promenade Improvements
4. Ore Dock Promenade Connections

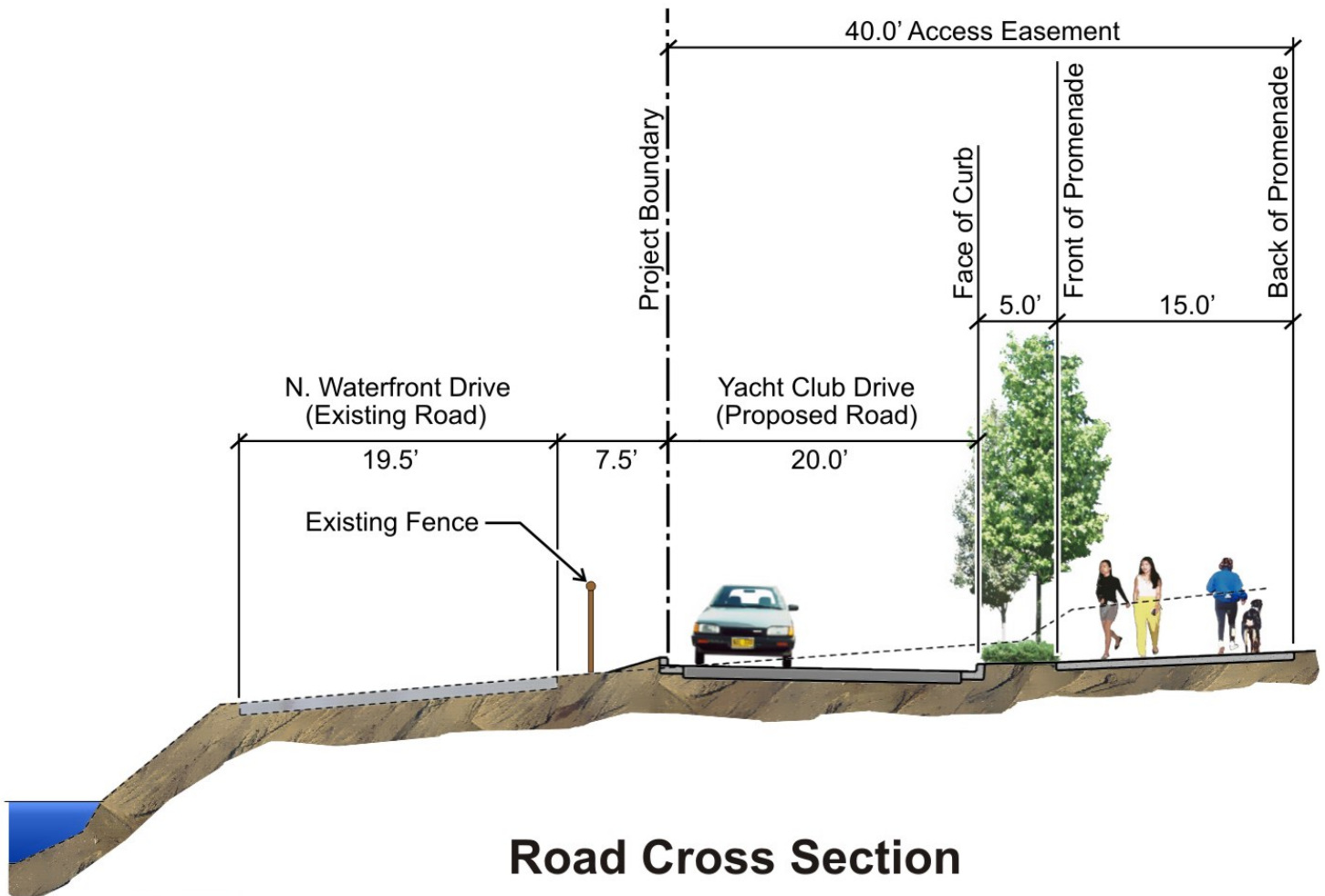
A - Viewpoint Park

1. Promenade Enhancements
2. View Terrace
3. Beach Access

Source: ESM, 2008



Plan View



Road Cross Section

Source: ESM, 2008

3.6 PUBLIC SERVICES AND UTILITIES

The following section describes the existing status of City of Tacoma and Town of Ruston entities providing service to the *Point Ruston* site and evaluates the impacts of added demand on such services as a result of redevelopment of this site under the EIS alternatives that are evaluated. Municipal services and utilities considered in this section include fire and emergency services, police, schools and utilities (water, sewer, stormwater, power and solid waste).

3.6.1 Affected Environment

3.6.1.1 Public Services

Approximately 44 acres of the Point Ruston site lies within the City of Tacoma and 38 acres is located within the Town of Ruston (see **Table 3.6.1**). Fire/emergency services and police services are provided by the respective agencies for the portions of site within their jurisdictions. Fire/emergency services and police services for the portion of the site within the City of Tacoma are provided by the Tacoma Fire and Police Departments. Fire/emergency and police services for the portion of the site within the Town of Ruston are provided by the Ruston Fire and Police Departments. The jurisdictions have historically maintained a level of cooperation in emergency response under mutual aid agreements.

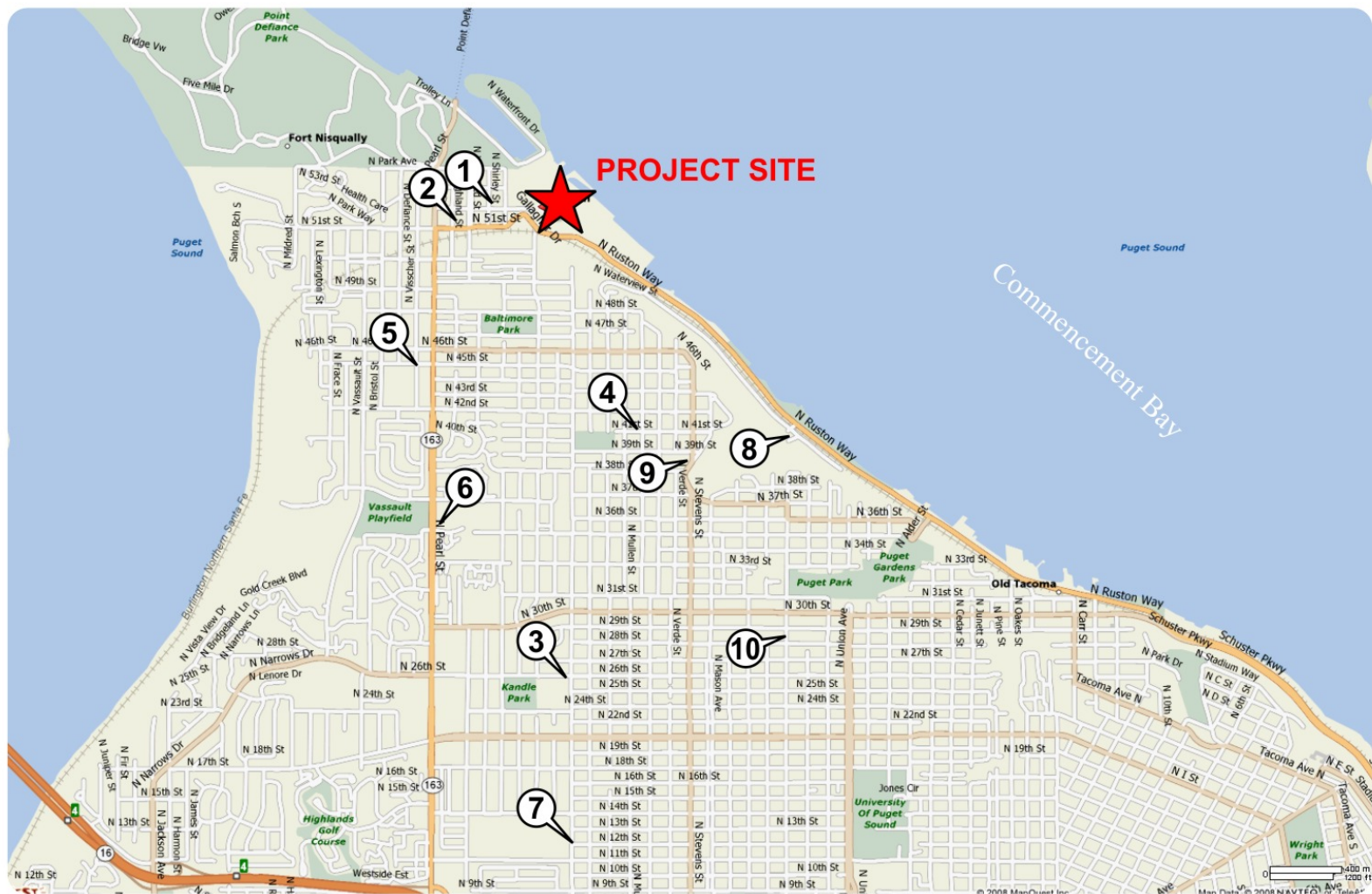
**Table 3.6.1
POINT RUSTON
ACREAGE BREAKDOWN BY JURISDICTION**

Jurisdiction	Acreage
City of Tacoma	44.43
Town of Ruston	37.81
TOTAL	82.24

Source: Point Ruston LLC

3.6.1.1.1 Fire and Emergency Services

Fire and emergency services for the portion of the site within the City of Tacoma are provided by the Tacoma Fire Department. Fire and emergency services for the portion of the site within the Town of Ruston are provided by the Ruston Fire Department. Historically, the jurisdictions have operated under an interlocal mutual aid agreement though the terms for continuance of that agreement are presently under discussion as is the alternative of contracting with the Tacoma Fire Department to provide primary fire and emergency services.



- 1 Ruston Police Department**
- 2 Ruston Fire Department**
- 3 Tacoma Police Department**
- 4 Tacoma Fire Department**
- 5 Point Defiance Elementary School**
- 6 Truman Middle School**
- 7 Wilson High School**
- 8 North End Wastewater Treatment Plant**
- 9 Sherman Elementary School**
- 10 Mason Middle School**

Source: Mapquest, Community Walk, 2007

City of Tacoma

The City of Tacoma Fire Department (TFD) provides fire protection, Basic Life Support (BLS) and Advanced Life Support (ALS)/emergency medical service (EMS) throughout the City, including the 44 acres of the *Point Ruston* site within the City, from sixteen fire stations. See **Figure 21** for the location of fire stations in the vicinity of the *Point Ruston* site.

Headquarters and the main office for the TFD are located at 901 Fawcett Ave. The Department also maintains a fireboat for response to marine incidents on Puget Sound. In addition to providing fire protection and emergency medical service within its boundaries, the TFD has entered into a county-wide Mutual Aid Agreement that allows county fire districts and the TFD to provide fire protection services to neighboring fire districts, as needed.

The TFD employs a total of 410 fire-fighting personnel and 35 civilian staff. All shift personnel are trained as both firefighters and Emergency Medical Technicians (EMTs) and trained to provide Basic Life Support (BLS). The Department also operates five full time medic units to provide Advance Life Support (ALS). Three engine companies are staffed with a firefighter/paramedic with ALS response capability.

The portion of the *Point Ruston* site that is located within the City of Tacoma is served primarily by Tacoma Fire Station 14, which is located at 4701 North 41st St. Station 14 has one engine company and does not house an ALS unit.

Town of Ruston

The Ruston Fire Department (RFD) provides fire protection, Basic Life Support (BLS) and emergency medical service (EMS) to the Town of Ruston, including the 38 acres of the *Point Ruston* site that is located within the Town. ALS response within the Town of Ruston is provided by Rural Metro from South 12th and Monroe St. in Tacoma. Service is provided from a single fire station located at 5117 N Winnifred Street.

The RFD employs a part-time Fire Chief and currently has a staff of 14 trained volunteers; the department is considering expansion to 20 personnel. The RFD responds to emergencies 24 hours a day, 7 days a week. All members are trained as both firefighters and Emergency Medical Technicians (EMTs) and are trained to provide Basic Life Support (BLS). The RFD Fire Station is equipped with two firetrucks and a fully equipped emergency aid van.

Table 3.6.2
RUSTON FIRE DEPARTMENT STATIONS SERVING THE POINT RUSTON SITE

Station	Location	Equipment	Response Time
Station 1	5117 N. Winnifred Street	2 fire trucks, 1 emergency van	Average time of 2:30 seconds

Source: Ruston Fire Department, 2007

As noted previously in this FSEIS, currently there are no on-site land uses. The current remediation and demolition activities on the site may require fire and emergency services but such has historically been rare.

Incident History

The TFD serves the entirety of the City of Tacoma with a population of approximately 218,000, as well as contracts to provide service to several surrounding jurisdictions. The TFD Communications Center handles approximately 40,000 calls for service annually. In 2006, the TFD responded to a total of 41,693 initially-dispatched incidents.

The RFD serves the entirety of the population of approximately 746 residents within the Town of Ruston. **Table 3.6.3** shows historical incident response data for the RFD station since 2002 including responses to calls for fire protection, emergency medical services, false alarms, mutual aid and other items (chemical spills, general public service and rescues). Between 2002 and 2006, the RFD has averaged approximately 60 total calls per year, with a range of 40 calls per year in 2005 and up to 78 in 2003. Fire and EMS service has remained constant for the RFD.

Table 3.6.3
RUSTON FIRE DEPARTMENT INCIDENT RESPONSES

Station	2002	2003	2004	2005	2006
Ruston F.D.	59	78	67	40	53

Source: Ruston Fire Department, 2007

Response Time and Level of Service

The response time goal of the Tacoma Fire Department in responding to an incident is 4 minutes 90 percent of the time. The City of Tacoma defines response time as “the amount of time that elapses from the time that a communications center receives an alarm until the responding unit is on the scene of the emergency and prepared to control the situation.” In 2006, TFD met this goal 64 percent of the time for fire calls and 71 percent of the time for EMS calls over the entire service area for first response.¹

The Town of Ruston Fire Department does not publish historical data for average response times nor has the RFD established a response time goal for arrival at the scene of a reported structure fire and/or critical medical emergency. The Town of Ruston, defines response time as “the amount of time that elapses from the time RFD receives notification (pager is answered and request is received) until RFD equipment arrives on the scene.” However, 2007 data (January through November) is available for the average response from the station and is listed in **Table 3.6.4**; this response time is considerably faster than the State average.

When residents of Tacoma or Ruston call 911 for fire or emergency medical response, the call is routed to the Law Enforcement Support Agency (LESA) communications center. A communications officer receives the call and gathers pertinent information about the type of emergency from the caller. A dispatcher then takes this information and dispatches the appropriate police or fire department initial response based on the type of emergency and the site's location (City of Tacoma or Town of Ruston in the case of the *Proposed Action*). Both Tacoma and Ruston are participants in a Pierce County mutual aid agreement. If an agency had insufficient resources to respond to a particular emergency on the *Point Ruston* site, aid would be dispatched from other nearby jurisdictions.

¹ Source: personal communication, Tacoma Fire Department (Dec. 20, 2007).

Table 3.6.4
RUSTON FIRE DEPARTMENT INCIDENT RESPONSE TIMES

Station	2007 (through November ²)
Ruston Fire Dept.	2:30 seconds

Source: Ruston Fire Department 2007

Fire Department Planning

The Tacoma Fire Department has 16 active fire stations distributed throughout the City, including the Port area. Each station has one engine. Four stations also have truck companies and five stations have Advanced Life Support (ALS) medic units. In addition, Station 18 is used for fireboat moorage and maintenance, and un-staffed Stations 5 and 12 are used for storage and other purposes. TFD staffing includes 410 uniformed personnel and approximately 35 civilians. The majority of the uniformed force is engaged in fire suppression and emergency medical service delivery. The TFD operates four shifts; minimum daily staffing is approximately 77 firefighters.

The Town of Ruston has one active station within the Town, with one main fire truck and one reserve fire truck as well as a ALS medical van. RFD has a part-time time fire chief and 14 volunteer members.

Level of Service

The City of Tacoma, in its *Comprehensive Plan*, maintains a Level of Service of .000016 units per capita for EMS service and .000109 apparatus per capita for fire service. The TFD's draft *Strategic Plan* is currently under review.

The RPD has not adopted a formal standard of service.

Neither the City of Tacoma nor the Town of Ruston currently has a fire impact mitigation fee ordinance; therefore, no payment of fire impact mitigation fees associated with new development is required within the City at this time.

3.6.1.1.2 Police Services

Similar to fire and emergency response services, police services for the portion of the site within the City of Tacoma are provided by the Tacoma Police Department. Police services for the portion of the site within the Town of Ruston are provided by the Ruston Police Department. The Departments have bilateral Notice of Consent agreements, which give officers authority to operate in the other jurisdiction under limited circumstances including: responding to emergencies involving an immediate threat to human life or property, responding to requests for assistance pursuant to a mutual aid agreement, transporting a prisoner, executing an arrest or search warrant or when in "fresh pursuit".

² 61 total responses for 2007, through November

City of Tacoma

The City of Tacoma Police Department (TPD) provides primary police protection services for the City of Tacoma. The TPD Headquarters is located at 3701 South Pine Street. The TPD operations are divided into three primary divisions: Operations Bureau, Investigative Bureau, Administrative Bureau, and as well as special units including: Canine (K-9) Unit, Traffic, SWAT, Marine Services, Special Operations, Animal Control and Compliance and other specialized police operations. The Operations Bureau is responsible for emergency 911 response, patrolling the City's streets, handling calls for service, conducting preliminary criminal investigations, responding to emergencies, enforcing traffic laws and investigating accidents. The Investigative Bureau is responsible for conducting follow-up investigations on information and reports generated by Operations Bureau personnel and investigating information provided by tips and informants. The Administrative Bureau is responsible for recruiting, hiring, training, internal affairs and other administrative duties.

TPD currently employs a total of 387 commissioned officers and 45 civilians to serve the City.

On average, approximately 25 Officers are patrolling Tacoma at any given time. Each Officer responds to an average of 18 dispatches per shift, and writes six reports. All reports are electronically generated by the officers using a mobile laptop computer in their vehicle. The high percentage (33%) of calls requiring formal written police reports reduces the total time officers provide proactive patrol during their shifts.

The *Point Ruston* site is located within TPD Sector 2, which extends from Ruston Way on the east to the Tacoma Narrows Airport on the west and from Point Defiance Park on the north to 19th Street on the south. TPD Sector 2 has the largest geographic coverage and population (approximately 73,000 people) of the four TPD sectors. In 2006, a new substation was constructed for Sector 2 operations at 5140 North 26th Street. See **Figure 21** for the location of the TPD Sector 2 station.

One lieutenant, six sergeants, thirty-four officers and three Community Liaison officers are assigned to Sector 2. Approximately three to four officers patrol Sector 2 during the day shift and five to six officers patrol the same district during the swing and graveyard shifts.

Currently, there are no on-site land uses. The remediation and demolition activities on-site may require police services, but such calls to the site are rare.

Town of Ruston

The Ruston Police Department (RPD) provides primary police protection services for the Town of Ruston. The RPD Headquarters is located at 5219 North Shirley Street.

RPD currently employs a total of four full time commissioned officers, four part time officers and two reserves to serve the Town and a fleet of 5 patrol cars and one motorcycle. There is typically one officer on patrol at any given time.

For special events such as the Fourth of July, Taste of Tacoma, Tall Ships Festival and marathon, Ruston has the capacity to have six officers on duty. To supplement this staffing, officers from surrounding communities such as Fircrest and DuPont have been employed. As

stated previously, the Departments have bilateral Notice of Consent agreements, which give officers authority to operate in the other jurisdiction under limited circumstances.

As noted, currently there are no land uses on-site. The remediation and demolition activities on the site may require police services; however, according to the RPD calls for service to the *Point Ruston* site are infrequent.

Call Volume and Workload

In 2006, the TPD received 181,144 total calls for service of which 46,070 originated from Sector 2. This represented a city-wide increase of 4.8 percent from the previous year and a 2.5 percent increase from the previous year in Sector 2.

On average, the RPD currently receives about 37 calls for service per month which has trended up moderately in recent years. In 2007, 452 criminal files were processed.

Level of Service

The City of Tacoma, in its *Comprehensive Plan*, maintains a Level of Service of 0.288580 of square feet of law enforcement facilities per capita.

The RPD has not adopted a formal standard of service.

Police Department Planning

There has previously been no public shoreline in the Town of Ruston. With the development of the proposed project and public access to the waterfront, the RPD may need waterfront access capability. Alternatively, an interlocal agreement with the City of Tacoma may be the most efficient form of agreement for the regulation of waterborne activities and water rescue.

3.6.1.1.3 Schools

The *Point Ruston* site is located within the Tacoma School District (School District). The School District currently operates 38 elementary schools, 11 middle schools and five high schools. Students attend schools based on neighborhood boundaries. The *Point Ruston* site lies within the boundaries of Point Defiance Elementary School, Sherman Elementary School, Mason Middle School, Truman Middle School and Wilson High School.

Existing Enrollment

As of 2007³, the Tacoma School District had an enrollment of 28,882 students in grades K-12. Enrollment has been in a steady state of decline since 1996 and this decline is anticipated to continue for the foreseeable future as discussed below. 2007 enrollment data for the schools nearest *Point Ruston* were as follows:

³ Data from Tacoma School District letter, February 14, 2008.

**Table 3.6.5
EXISTING (OCTOBER 2007) SCHOOL ENROLLMENT**

	Point Defiance Elementary	Sherman Elementary	Mason Middle School	Truman Middle School	Wilson High School
Existing Enrollment	355	326	778	659	1,189

Source: Tacoma Public Schools

There are currently no residences on-site, and, therefore, no students are generated by existing land uses at the *Point Ruston* site.

Projected Enrollment

The Tacoma School District has formulated enrollment projections for the next five years.⁴ District projections are based on actual enrollment for the previous three years and anticipated growth based on population forecasts from the Puget Sound Regional Council. The enrollment projections did not consider proposed new residential developments in the City of Tacoma. The study indicated that approximately 1,800 multi-family housing units are currently proposed for future construction and sale within the District's boundaries and that "it is unlikely that these will have a positive effect on enrollment, and the potential negative effect has already been considered when creating the District level forecast."

According to the *School Enrollment Projection* study, District-wide enrollment is anticipated to continue to decline for the next five years (see **Table 3.6.6**).

**Table 3.6.6
TACOMA SCHOOL DISTRICT PROJECTED ENROLLMENT**

Grades	2007	2008	2009	2010	2011
Elementary Grades K-5	13,511	13,415	13,322	13,136	12,940
Middle School Grades 6-8	6,337	6,128	6,066	6,045	6,136
High School Grades 9-12	<u>9,034</u>	<u>8,688</u>	<u>8,345</u>	<u>8,122</u>	<u>7,825</u>
TOTAL	28,882	28,231	27,733	27,303	26,901

Source: School Enrollment Projections 2007 – 2011 (2007)

In addition to District-wide enrollment projections, the Tacoma School District also projected enrollment for individual schools within the District for the next five years. Projected enrollment for schools closest to the *Point Ruston* site is shown in **Table 3.6.7**:

⁴ *School Enrollment Projections: 2007 – 2011*, William L. Kendrick, Tacoma School District, 2007.

Table 3.6.7
TACOMA SCHOOL DISTRICT PROJECTED ENROLLMENT
FOR SCHOOLS SERVING POINT RUSTON SITE

School	2007	2008	2009	2010	2011
Point Defiance Elementary	336	324	316	313	305
Sherman Elementary	320	317	310	307	308
Mason Middle School	747	726	720	728	740
Truman Middle School	642	608	596	614	623
Wilson High School	1187	1104	1062	1052	1015

Source: School Enrollment Projections 2007 – 2011 (2007)

Enrollment for Point Defiance Elementary, Sherman Elementary and Wilson High School are anticipated to continue the current trend of decline. Truman Middle School and Mason Middle School enrollment is anticipated to decline until 2010 when enrollment would begin to increase, but not to current enrollment levels.

Capacity

Of the schools closest to the *Point Ruston* site, the following reflects the current enrollment and available capacity of the schools nearest the Point Ruston site:

Table 3.6.8
TACOMA SCHOOL DISTRICT PROJECTED ENROLLMENT AND CAPACITY
FOR SCHOOLS SERVING POINT RUSTON SITE

	Point Defiance Elementary	Sherman Elementary	Mason Middle School	Truman Middle School	Wilson High School
Capacity	525	450	750	750	1,800
Current Enrollment (Oct 2007)	355	326	778	659	1,189
Available Capacity/Deficiency	170	124	(28)	91	611

Source: Tacoma School District, 2008

Point Defiance Elementary, Sherman Elementary, Truman Middle School and Wilson High School are operating under the current capacity. The current enrollment level at Mason Middle school is 28 students over the stated capacity.

School Impact Mitigation Fees

Under the Growth Management Act (GMA), cities, towns, and counties are authorized to impose impact fees on new development to help finance certain public facilities, including schools, within their jurisdiction. Neither the City of Tacoma nor the Town of Ruston currently impose school mitigation fees.

School District Planning

The Tacoma School District issued an updated *Facilities Master Plan* in August 2007. The plan states that the District's goal is to modernize, remodel or replace all District schools over the 30-year planning period (1986-2016). This master plan indicates that the schools serving the *Point Ruston* site have previously been improved as part of the current 30-year renewal and replacement cycle: Point Defiance Elementary School was remodeled and expanded, Truman and Mason Middle Schools were replaced with new facilities and Wilson High School was remodeled and expanded. No other remodels, expansions or replacements are currently planned for these schools; therefore no changes in capacity are assumed at this time.

Student Generation Rates

The Tacoma School District issued new Student Generation Rates in November of 2007⁵. The Student Generation Rates were formulated using Pierce County Assessor-Treasurer data on development activity for the years 2002 through 2006. The student generation rates are summarized in **Table 3.6.9**.

Table 3.6.9
TACOMA SCHOOL DISTRICT STUDENT GENERATION RATES

	Single Family Unit	SFU Percentage	Multi-Family Unit	MFU Percentage
Elementary	0.258	53%	0.130	23%
Middle School	0.123	19%	0.047	47%
High School	<u>0.162</u>	<u>28%</u>	<u>0.069</u>	<u>30%</u>
TOTAL	0.543	100%	0.246	100%

Source: Tacoma Public Schools 2007 Student Generation Rates, Mike McCormick, November 2007

As is reflected in the Tacoma School District's Student generation rates, rates are typically lower for multi-family residential developments than single-family residential developments. It is anticipated that the proposed *Point Ruston* development would have a considerably lower student generation rate than average multi-family units due to factors of density and price. Market rate, dense urban residential developments including condominiums and apartments with more than 20 units typically generate lower student ratios than average multi-family dwelling units.⁶ The results from an informal poll of Tacoma residential developments comparable to the proposed *Point Ruston* development corroborate this assumption and found an average student generation rate of 0.004, as shown in **Table 3.6.10**:

⁵ Tacoma Public Schools 2007 Student Generation Rates, Mike McCormick, November 2007.

⁶ Multi-Family Market Outlook, National Multi-Housing Council, July 2005.

Table 3.6.10
STUDENT ENROLLMENT AT TACOMA RESIDENTIAL DEVELOPMENTS
COMPARABLE TO POINT RUSTON

Development	Income Level	Number of Dwellings	Number of School-Age Students (K-12)	Student Generation Rate
Gas Lamp Terrace	Market	21	0	.00
McCarver Village	Market	59	0	.00
Vintage Y	Market	19	0	.00
The Robertson	Market	47	0	.00
Marcato	Market	92	1	.01
Thea's Landing	Market	236	0	.00
Metropolitan Apts	Market	87	1	.01
Court 17 Apts	Market	128	0	.00
Hawthorne Hills	Market	44	1	.02
TOTAL/AVERAGE		733	3	.004

Source: *Point Ruston LLC, 2007*

As part of a recent economic study conducted by the City of Federal Way,⁷ two different student generation rates were assumed for multi-family units. They both used the average student generation factor (0.1783 students per unit), as well as a specific student generation factor for multi-family units in the City Center (0.052 students per unit), which would be comparable to the *Proposed Action*.

An “expected” multi-family student generation rate for the *Point Ruston* development is estimated to approximate 0.05 students per dwelling unit, which is much lower than the 0.246 multi-family student generation rate of the TSD (refer to **Table 3.6.11**). As stated previously, this “expected” multifamily student generation rate is based upon:

- the results of the survey of comparable market rate urban development in Tacoma demonstrating a student generation rate of 0.004;
- the City of Federal Way economic analysis, which developed an urban, multi-family unit (similar to the *Proposed Action*) student generation rate of 0.052; and
- analysis performed by the National Association of Home Builders in 2005,⁷ which indicated that market rate, dense urban residential developments including condominiums and apartments with more than 20 units typically generate lower student ratios than average multi-family dwelling units.

⁷ Tax Exemption Program for Multifamily in City Center, City of Federal Way, October 2002.

Table 3.6.11
“EXPECTED” POINT RUSTON MULTI-FAMILY
STUDENT GENERATION RATES

	Multi-Family Unit	MFU Percentage
Elementary	0.02	23%
Middle School	0.01	47%
High School	0.02	30%
TOTAL	0.05	100%

Source: Blumen Consulting Group, Inc.

3.6.1.2 Utilities

3.6.1.2.1 Water

Tacoma Water, a Division of City of Tacoma Public Utilities, provides approximately 94,000 connections supplying water service to an estimated population of 303,000 in the City of Tacoma (City). The average customer consumed 96,501 gallons of water per year. Tacoma Water supplies drinking water from the Green River, located on the east side of the City, to the service areas. Tacoma Water’s distribution system encompasses an area of approximately 150 square miles in the City of Tacoma and portions of Pierce and South King Counties. The distribution system contains nearly 1,200 miles of pipe. Tacoma Water has built a storage system consisting of the 210- million-gallon McMillin Reservoir plus 16 other reservoirs, standpipes and tanks that can store up to 78 million gallons of additional water. According to the 2007 *Tacoma Water Comprehensive Plan*, the Tacoma Water system as a whole has excess storage capacity. Tacoma Water’s Green River First Diversion water right can supply up to 73 million gallons of water each day and the Second Diversion water right can provide up to an additional 65 million gallons of water each day.

A *Water Availability Study* was conducted in March 2006 in support of the 2007 *Tacoma Water Comprehensive Plan* update. That study indicates that the City has adopted and will implement a long-term improvement program designed to adequately accommodate the service area’s projected population increase through the year 2020 considering both the Tacoma Water’s “expected” growth estimates and more conservative PSRC population growth estimates.

A 12-inch water main with approximately 104 pounds of static pressure runs in the existing Ruston Way alignment adjacent to the site and may be relocated by the project as a part of the Ruston Way realignment project (see discussion in Section II of this FSEIS). Service would be extended from the water main into the site as development occurs. All onsite water utilities have been or will be removed and replaced as part of redevelopment for the *Point Ruston* site.

3.6.1.2.2 Sanitary Sewer

The City of Tacoma Wastewater Management (Tacoma Public Works Environmental Services) provides sewer service to approximately 90,000 customers the City, the Town of Ruston and other areas within Pierce County. Wastewater is carried from homes and businesses by pipes and pump stations before it is treated at wastewater treatment plants and released into Commencement Bay. This sewer system includes 50 pump stations which then transport sanitary sewer to one of the City’s two wastewater treatment facilities: the Central

Wastewater Treatment Plant, located on the Tideflats along the Puyallup River, and the North End Wastewater Treatment Plant near Mason Gulch which would receive flows from the *Point Ruston* project.

An existing 24-inch trunk line is located within Ruston Way and currently provides service to the site. This trunk line would be replaced as a part of the Ruston Way realignment component of the *Point Ruston* project. The reconstruction of the trunk line would be designed and approved in accordance with the City of Tacoma's Design Manual. Existing mains connecting to the existing trunk line would be extended to the new line and the old 24-inch line would be removed. The new sanitary sewer line would be a minimum of 24-inch diameter with a full pipe capacity of 23 cfs.

As the *Point Ruston* site is currently vacant, no sanitary sewer utility services are currently provided on the site.

3.6.1.2.3 Electricity

Tacoma Power, a department within City of Tacoma Public Works, provides electrical service to 159,000 customers in a service area of over 180 square miles within the City, the Town of Ruston on a wholesale basis, and other portions of Pierce County. The average household consumed about 12,000 kilowatt hours per year. Tacoma Power provides electricity to its service area via 4 main stations, 3 switching stations, 46 distribution substations, 15 dedicated-load distribution substations, 23 Bonneville customer substations and 7 generation substations.

Minimal temporary electrical utility services are currently provided on the site to for remediation and monitoring equipment.

Electrical service is currently provided to the site from facilities within the existing Ruston Way alignment at the southeast end of the property and in 51st Street. These existing facilities could be removed and replaced as a part of the Ruston Way realignment component of the *Point Ruston* project and could also be extended as a part of the Baltimore Street reconnection to Ruston Way in order to serve the site.

3.6.1.2.4 Stormwater

Two outfalls remaining from the ASARCO smelter operations currently operate on the site and serve approximately 88 acres of offsite property in Ruston and Tacoma. The site outfalls will be abandoned as part of remediation under the Second Amendment to the Consent Decree as required by EPA. The existing City of Tacoma outfalls located adjacent to the site currently serve offsite stormwater collection systems that bypass the site. Design work to date has indicated that upgrades to the existing outfalls may be needed if offsite runoff that is currently running through the site outfalls is rerouted to them. The City of Tacoma Edwards Street Outfall is located in an easement across a section of Tract A and the City Outfall is located under North Waterfront Street adjacent to the property and the Metropolitan Park District's Peninsula Park.

3.6.1.2.5 Solid Waste

Solid Waste Management, part of the City of Tacoma Public Works Environmental Services Department, provides garbage, recycling and yard waste services for single-family residential homes, multi-family units and commercial businesses. Solid Waste Management provides

curbside garbage, recycling and yard waste collection for about 52,000 single-family residential homes and 4,400 multi-family units and commercial businesses. The utility also operates the Tacoma Landfill, a recycling center and a household hazardous waste facility as well as a residential bulk item collection service. All the garbage that comes to the Tacoma Landfill goes into a compactor, then it is hauled in semi-tractor trailers to a landfill in Graham, Washington.

As the *Point Ruston* site is currently vacant, no solid waste services are currently provided to the site.

3.6.1.2.6 Telecommunications

Telecommunications utilities for the *Point Ruston* site are provided by Qwest with existing facilities in Ruston Way, 51st Street and Baltimore Street, which could be extended into the site.

3.6.1.2.7 Cable Television/Broadband Internet

Cable television service and broadband internet for the *Point Ruston* site are provided by Comcast and Click! Network.

3.6.2 Impacts

This section focuses on probable significant impacts of the *Proposed Action* and the *No Action Alternative* at full-buildout of the site. Approval of the *Proposed Action* would create new capacity for a range of residential, retail and office uses, along with associated employment and population. Increases in employment and population on-site over the 8 to 10 year build-out period would create related increases in demand for public services. Redevelopment on the site would occur gradually over time with the initial building to be completed in 2008 and demands on public services would increase incrementally through 2018.

3.6.2.1 Proposed Action

The *Proposed Action* would result in the creation of approximately 1,300,000 million square feet of mixed-use development over the 8 to 10 year planning period. This project would include 800 to 1,000 multifamily dwelling units with an associated on-site residential population of approximately 1,400 – 1,750, as well as employment-generating uses -- including office, retail, hotel and restaurant uses -- at full build-out by approximately 2016.

For purposes of this FSEIS, portions of the impact analysis for fire and police services are based on established level of service standards and information provided by the TFD and RFD. Impacts to public schools were determined based on students per household rates from the Tacoma School District and other analyses. Impacts to utilities were determined based upon preliminary engineering conducted by Point Ruston LLC and information provided by the utility providers.

3.6.2.1.1 Construction

During construction, there could be an increase in demand for fire and police services and potential impacts to nearby schools. Fire Department service calls related to inspection of specific construction projects on-site and to respond to potential construction-related accidents

and injuries could increase as a result of construction. Site preparation and construction of new infrastructure and buildings could also increase the risk of a medical emergency or accidental fire. Police Department service calls could increase during construction due to construction site theft and vandalism. Fire and Police Department staffing and equipment needs include increased service levels needed to serve onsite construction activities (see below).

It is assumed that most of the site's existing utilities would be removed and replaced during redevelopment. No substantial interruption of water, electrical, or sewer service to current users would be anticipated during the ongoing construction phase. The existing utility distribution system would continue to serve the site until new systems are constructed and become operational. Existing infrastructure would be used to meet demands during initial construction activities.

Stormwater runoff during construction would be collected and routed to stormwater quality treatment facilities/ prior to discharge. Best management practices would be utilized to prevent impacts associated with erosion and sedimentation. During remediation and site-cap work completed under EPA's jurisdiction, a construction NPDES permit would not be required. Once the cap is in place on a phase or portion of the property, subsequent construction activities would be subject to coverage under Ecology's Construction National Pollution Discharge and Elimination System (NPDES) permit).

3.6.2.1.2 Operations

3.6.2.1.2.1 *Fire and Emergency Services*

Potential impacts on fire and emergency services from the *Point Ruston* project were assessed based on communications involving respective departments and upon the estimated on-site residential and employee population.

All new buildings in the *Point Ruston* redevelopment would be constructed in compliance with applicable codes -- including the International Fire Code and the International Building Code, as adopted by the City of Tacoma and Town of Ruston. Automatic fire extinguishing systems, stand pipes with fire department connections and fire alarm systems will be provided where required by these codes. Adequate fire flow to serve the proposed development would be provided as required. Specific requirements regarding emergency access to structures would be adhered to, as required by the respective Fire Code.

Development that has been assumed for the *Proposed Action* would occur incrementally over the 8 to 10 year build-out period and would add to the City's, Town's and Tacoma Metro Park's tax base; a portion of the tax revenues generated by redevelopment could help offset incremental increases in demand for public services. Construction sales tax, retail sales tax, business and occupation tax and property tax would all be sources of revenue for the taxing jurisdictions. The new development would also add to the tax base for the City's General Fund through fees, licenses and permits and utility taxes. It is assumed that long-term capital and operating needs of the Fire Department would be addressed on a broad basis through incremental capital facilities planning by the City over the entire 8 to 10 year build-out period.

City of Tacoma

Operation of the portion of the *Point Ruston* within the City of Tacoma, including approximately 600 to 775 dwelling units, 60,000 to 95,000 sq.ft. of commercial/retail uses and 26 acres of parks and open space assumed for the *Proposed Action* would result in added demand for TFD fire and emergency services.

Considering the TFD's work in outlying jurisdictions, as well as the close proximity of Station 14 to the *Point Ruston* site, it is anticipated that the TFD would have excess capacity to meet the added demand for fire and emergency service at *Point Ruston*.

In addition to demands created by residents and employees, visitors to the site associated with the park and trail network could also place added demands on City fire and emergency services. The added demand from such sources would not be expected to increase the estimated staff and equipment needs highlighted above, however.

Town of Ruston

Operation of the portion of the *Point Ruston* within the Town of Ruston including 200-240 dwelling units, 100,000 to 134,000 square feet of commercial/retail uses, and 24 acres of parks and open space assumed for *Proposed Action* would result in added demand for Ruston Fire Department fire and emergency services.

As the *Proposed Action* is built out within Ruston's jurisdiction, there may be an increased need for equipment and personnel to meet the Town of Ruston's fire service needs. The nature of the increases would be the subject of risk management decisions made by the Town considering factors such as Washington Survey and Ratings Bureau Fire Ratings. Such increased staffing and equipment may include the need for ladder trucks as well as the need for full time administrative staff. Other mitigation may include contracting with Tacoma Fire Department's ladder company.

As noted with regard to the City of Tacoma, in addition to demands created by residents and employees, visitors to the site associated with the park and trail network could place added demands on the Town's fire and emergency services. The added demand from such sources, however, is not be expected to increase the estimated staff and equipment needs noted above.

3.6.2.1.2.2 Police Services

Potential impacts on police services from the *Point Ruston* project were assessed based on established level of service standards and information provided by the TPD and RPD and relative to the estimated on-site residential and employee population.

Site design standards for the *Point Ruston* development would include features intended to help reduce potential criminal activity and calls for service on-site. Such features include: providing design elements that promote visibility; orienting buildings toward sidewalks, streets, and/or public spaces to enhance the safety of focal points for social gathering; providing convenient pedestrian connections between buildings; minimizing "blind" areas; and, providing adequate lighting. In addition, open spaces between buildings could be designed to be centrally located and provide extra visibility. The City of Tacoma sponsors a program promoting such measures, Crime Prevention Through Environmental Design (CPTED), which provides guidance for