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Final Environmental Impact Statement

20th Street SE Corridor

Subarea Plan

JULY 2012

CITY OF LAKE STEVENS

Planning and Community Development
City of Lake Stevens
P. O. Box 257
Lake Stevens, WA 98258
(425) 377-3230

July 31, 2012

Dear Affected Agencies, Tribes, Organizations and Interested Parties:

Enclosed is the Final Environmental Impact Statement (Final EIS) for the 20th Street SE Corridor Subarea Plan. This document has been prepared to comply with the requirements of the State Environmental Policy Act (SEPA). Publication of the Final EIS completes the environmental review process for the subarea plan and related actions, which include the following:

1. Adopting a subarea plan, pursuant to the Revised Code of Washington (RCW) 36.70A.080, which will amend and become an element of the Lake Stevens Comprehensive Plan. The subarea plan includes goals, policies, a land use map and design guidelines;
2. Amending the zoning map to rezone properties consistent with the subarea plan;
3. Revising the land use code (Title 14 LSMC) to adopt new classifications and development standards, and adopting additional implementing regulations including a traffic impact fee program;
4. Amending the Comprehensive Plan's Transportation Element and Capital Facilities Element to address infrastructure needs required to support planned growth in the subarea; and
5. Adopting an ordinance designating the subarea as a Planned Action, pursuant to the State Environmental Policy Act (SEPA, RCW 43.21C.031) and the SEPA Rules (Washington Administrative Code (WAC, 197-11-164), for purposes of future environmental review and permitting.

The 20th Street SE Corridor subarea covers an area of approximately 845 acres in the southern portion of the City, north and south of 20th Street SE, and east and west of SR-9. The subarea was annexed to the City on December 31, 2009. Subarea plan objectives encourage creating an appealing gateway to the City; promoting economic development and a more positive balance of jobs and housing, and providing a mix of jobs, goods and services, housing and recreation/open space; attracting a variety of employers; encouraging a concentration of local and regional retailing and services around the 20th Street SE/SR-9 intersection; creating pockets of parks and open space throughout the subarea; continuing the widening of 20th Street SE westward towards the US 2 trestle; providing multiple routes of travel with clear circulation and access; and enhancing the appearance of streets, sidewalks, sites and buildings.

The City has been using an integrated planning and environmental review process to evaluate land use options for the subarea. The alternatives presented in the Draft EIS considered varying levels of growth and placed different emphases on commercial or residential land uses. Based on this integrated process, the City has identified *Alternative 2* as its Preferred Alternative for further review and discussion. The table below summarizes the land use assumptions for the alternatives.

Alternative	Retail (Gross Sq. Ft)	Office (Gross Sq. Ft)	Housing Units
Alternative 1 – No Action	150,000-180,000	20,000-35,000	600-1,200
Preferred Alternative/Alternative 2 – Employment/Commercial Emphasis	**400,000-450,000**	**1-1.25 million**	**900-1,000**
Alternative 3 – Moderate Employment/Commercial with Residential Emphasis	300,000-350,000	600,000-750,000	1,200-1,400

The Draft EIS for the 20th Street SE Corridor Subarea was published in January 24, 2012 and provided a 45-day comment period. A public meeting was also held on March 8, 2012 to describe the subarea plan alternatives and to receive public comment. The Final EIS provides responses to all written and verbal comments that were received on the Draft EIS during the comment period.

The City has distributed the Final EIS to agencies, tribes and organizations noted on the Distribution List. Interested parties can review the Final EIS and background information concerning the proposal, between the hours of 8:00 AM and 5:00 PM, at the Lake Stevens Department of Planning and Community Development offices at 1812 Main Street, Lake Stevens, WA 98258. The Final EIS is also available for review at the Sno-Isle Library - Lake Stevens located at 1804 Main Street. The Final EIS can also be viewed or downloaded on the internet at the City's website at www.lake stevenswa.gov, go to "Planning Department" page, click on "Long-Range Planning" and finally on "20th Street SE Corridor Subarea Plan".

CD copies of the Final EIS may also be purchased from the Lake Stevens Planning and Community Development Department at the address listed above.

The Lake Stevens Planning Commission and City Council will be scheduling meetings and public hearings on the subarea plan and development regulations in the near future. The City will publish notice of all upcoming meetings through its usual procedures.

For additional information, please contact:

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Thank you for your interest in the 20th Street SE Corridor Subarea Plan.

SEPA Responsible Official

Rebecca Ableman
Planning & Community Development Director

FACT SHEET

Project Title

20th Street SE Corridor Subarea Plan/Planned Action

Proponent

City of Lake Stevens

Location

The City of Lake Stevens is located in Snohomish County, approximately six miles east of downtown Everett. The 20th Street SE Corridor crosses the southern side of the City from approximately South Lake Stevens Road in the east to Cavalero Road in the west and is a major east-west route for traffic to Interstate 5 via State Route (SR) 2 on the trestle to Everett. The 20th Street SE Corridor Subarea is comprised of approximately 845 acres of land located north and south of 20th Street SE, east and west of SR-9.

Proposed Action & Alternatives

The City of Lake Stevens will consider the following actions and approvals:

1. Adopting a subarea plan, pursuant to the Revised Code of Washington (RCW) 36.70A.080, for the 20th Street SE Corridor Subarea Plan, which will amend and become an element of the Lake Stevens Comprehensive Plan. The subarea plan includes goals, policies, a land use map and design guidelines;
2. Revising the land use code (Title 14 LSMC) text to adopt new zoning classifications and development standards; adopting other implementing regulations including a traffic impact fee;
3. Amending the zoning map to rezone properties consistent with the subarea plan;
4. Amending the Comprehensive Plan's Transportation Element and Capital Facilities Element to address infrastructure needs required to support planned growth in the subarea; and
5. Adopting an ordinance designating the subarea as a Planned Action, pursuant to the State Environmental Policy Act (SEPA, RCW 43.21C.031), and the SEPA Rules (Washington Administrative Code (WAC) 197-11-164), for purposes of future environmental review and permitting.

These actions are legislative in nature and require a public hearing(s), a recommendation by the Planning Commission and approval by the City Council. The City has identified Alternative 2 as the Preferred Alternative for purposes of further discussion and environmental review.

The EIS considers three alternatives, which involve different amounts, types and intensities of growth within the subarea:

> ***Alternative 1/No Action,*** which is required by SEPA, assumes continued growth under existing zoning and current plans without the adoption of a subarea plan;
>
> ***Preferred Alternative/Alternative 2*** places the greatest emphasis on encouraging and accommodating significant employment and commercial growth in the subarea. It focuses growth in a number of nodes along the corridor, alongside some larger complexes, with an increase in higher-density residential uses in transitional areas; and
>
> ***Alternative 3***, which is similar to *Alternative 2,* emphasizes moderate employment growth in identified commercial and mixed-use nodes and centers, but places a greater relative emphasis on residential growth, particularly higher-density residential growth compared to *Alternative 2*.

The type and intensities of new growth being considered under the EIS alternatives are summarized below.

Summary of Growth Assumptions for Alternatives

Alternative	Retail (Gross Sq. Ft)	Office (Gross Sq. Ft.)	Housing (dwelling units)
Alternative 1 – No Action	150,000-180,000	20,000-35,000	600-1,200
Preferred Alternative/ Alternative 2 – Employment/Commercial Emphasis	**400,000-450,000**	**1-1.25 million**	**900-1,000**
Alternative 3 – Moderate Employment/Commercial with Residential Emphasis	300,000-350,000	600,000 - 750,000	1,200-1,400

Integrated SEPA/GMA Planning Process

The City has been using an integrated planning and environmental review process, as authorized by WAC 197-11-210, to identify a preferred alternative for consideration. The Preferred Alternative preliminarily selected for further discussion is the same as *Alternative 2* evaluated in the Draft EIS.

Phased Environmental Review and Adoption of Existing Document

The City is using phased environmental review, as authorized by WAC 197-11-060(5), for its Growth Management Act planning decisions. Phased review is intended to allow agencies and the public to focus on issues that are ready for decision and to exclude issues that have already been decided or are not ready for detailed evaluation.

The City is also adopting the EIS prepared in 2006 for its Comprehensive Plan to help meet its SEPA responsibilities for the present proposal.

The City issued a separate Planned Action Final EIS for the Lake Stevens Center Subarea Plan on July 27, 2012. The two subareas are independent projects, which are being planned and reviewed concurrently; future connections between the two subareas and related cumulative effects are being considered. Both subareas were included in a previous economic development strategy and fiscal analysis.

Lead Agency

City of Lake Stevens Planning and Community Development Department

Responsible Official

Rebecca Ableman, Planning and Community Development Director

Contact Person

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Draft EIS Principal Authors & Contributors

The Final EIS was prepared under the direction of the City of Lake Stevens. The following firms and entities participated in preparation of the Final EIS:

Weinman Consulting – Document compilation and editing; Planned Action Ordinance
AHBL – Earth; Water Resources; Plants & Animals, Wetlands; Cultural Resources; Utilities; document production
Fehr & Peers – Transportation, Greenhouse Gas Emissions
Environ Corp – Air Quality
City of Lake Stevens – Land Use; Population, Housing & Employment; Public Services
LMN Architects – Subarea Plan & Alternatives

Location of Background Material

City of Lake Stevens Planning and Community Development Department
Permit Center
1812 Main Street
Lake Stevens, WA 98258

Date of Draft EIS Issuance

January 24, 2012

Date of Final EIS Issuance

July 31, 2012

Public Hearings on the Subarea Plan

The Planning Commission and City Council will hold public hearings on the proposed subarea plan:

- **Planning Commission** – August 1, 2012, 7 pm, Lake Stevens Center Community Center, 1812 Main Street (may be continued to August 15)
- **City Council** – August 27, 2012, 7 pm, Lake Stevens School District Educational Service Center, 12309 22nd Street NE (Hearing may be continued to September 10, 2012)

Cost and Availability of Document

Copies of the Final EIS and/or notices of availability have been distributed to the agencies, tribes, organizations and individuals noted in the Distribution List.

The Final EIS is available for review at the Lake Stevens Planning and Community Development Department, at the address above, and at the Lake Stevens branch of the Sno-Isle Library, located at 1804 Main Street, in downtown Lake Stevens and on the City's website at http://www.ci.lake-stevens.wa.us/LakeStevensCenter.htm. Printed copies of the Final EIS may be purchased from the City, at the previously noted address, for the cost of reproduction (~$60). Copies on CD are available for a cost of $5.

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1. SUMMARY

1.1 Proposed Action & Alternatives

Legislative Actions

The City of Lake Stevens will consider the following actions and approvals for the 20th Street SE Corridor Subarea:

1. Adopting a subarea plan, pursuant to the Revised Code of Washington (RCW) 36.70A.080, which will amend and become an element of the Lake Stevens Comprehensive Plan;
2. Amending the zoning map to rezone properties consistent with the subarea plan;
3. Revising the land use code (Title 14 LSMC) text to amend or adopt new classifications, development standards and/or design guidelines;
4. Amending the Comprehensive Plan's Transportation Element and Capital Facilities Element to address infrastructure needs required to support planned growth in the subarea; and
5. Adopting an ordinance designating the subarea as a Planned Action, pursuant to the State Environmental Policy Act (SEPA, RCW 43.21C.031) and the SEPA Rules (Washington Administrative Code (WAC) 197-11-164)), for purposes of future environmental review and permitting.

Study Area

The City of Lake Stevens is located in Snohomish County, approximately six miles east of downtown Everett. The 20th Street SE Corridor crosses the southern portion of the City from approximately South Lake Stevens Road in the east to Cavalero Road in the west. The 20th Street SE Corridor Subarea, shown in Figure 2-1, is comprised of approximately 845 acres of land located north and south of 20th Street SE, east and west of SR-9. The subarea was annexed into the City on December 31, 2009.

Proposal Objectives

The objectives for the 20th Street SE Corridor Subarea Plan are based on policies in the Lake Stevens Comprehensive Plan and the opportunities identified in recent economic studies and an economic development strategy. The objectives provide a basis for developing and evaluating subarea plan alternatives.

1. Establish 20th Street SE as an appealing gateway into the city with attributes reflecting a distinct, unified community.
2. Promote economic development and a more positive balance of jobs and housing by providing a mixture of jobs, goods and services, housing with recreation/open space and protection of important environmental resources.

3. Attract a variety of employers of varying sizes.
4. Encourage a concentration of local and regional retailing and services around the intersection of 20th Street SE and SR 9.
5. Create pockets of parks and open space throughout the corridor.
6. Continue the widening of 20th Street SE westward towards the Hewett Avenue (US-2) trestle.
7. Provide multiple routes of travel with clear circulation and access to destinations including parallel east-west circulation routes north and south of 20th Street SE.
8. Enhance the appearance of streets, sidewalks, sites, and buildings.

EIS Subarea Alternatives

The EIS considers three alternatives, which involve different amounts, types and intensities of growth within the subarea, as summarized in Table 1-1. Assumptions about future growth are based on a review of historical land use patterns, adopted forecasts, projects currently under review, and emerging economic development strategies. Land use for the alternatives is illustrated in Figures 2-2, 2-3 and 2-4, contained in Chapter 2.

The City has been using an integrated SEPA/GMA planning process, described in Section 1.2, to help identify a preferred alternative using review of environmental information and consideration of public comment. *Alternative 2,* as described in the Draft EIS, is identified as the preferred alternative, for purposes of further discussion.

Table 1-1. Summary of Growth Assumptions for Alternatives

Alternative	Retail (Gross Sq. Ft)	Office (Gross Sq. Ft)	Housing Units (dwelling units)
Alternative 1 – No Action	150,000-180,000	20,000-35,000	600-1,200
Preferred Alternative/ Alternative 2 – Employment/Commercial Emphasis	**400,000-450,000**	**1-1.25 million**	**900-1,000**
Alternative 3 – Moderate Employment/ Commercial with Residential Emphasis	300,000-350,000	600,000-750,000	1,200-1,400

Alternative 1/No Action Alternative

The *No Action Alternative,* which is required by SEPA, assumes continued growth under existing zoning and current plans without the adoption of a subarea plan. Land use would be primarily single-family residential, with one or two areas of additional commercial development. The subarea would not be designated as a Planned Action. Overall, under the *No Action Alternative,* the 20th Street SE Corridor would retain much of its current character in terms of type and intensity of land uses. Site-by-site development would occur without the guidance of an overarching plan or vision. Commercial growth assumed in the *No Action Alternative* primarily reflects vested or planned development projects. A wide variety of commercial uses could occur on appropriately zoned properties (Local Business and Sub-Regional Commercial zones) alongside single-family residential uses in the remainder of the area.

Preferred Alternative/Alternative 2 (Employment/Commercial Emphasis)

The *Preferred Alternative/Alternative 2* places the greatest emphasis on encouraging and accommodating significant employment and commercial growth in the subarea that focuses growth in a number of nodes along the corridor, alongside some larger complexes, with an increase in higher-density residential uses in transitional areas. The Preferred Alternative is substantially the same as Alternative 2 evaluated in the Draft EIS. Specific changes are described in Section 2.6 of this FEIS.

Alternative 3 (Moderate Retail/Commercial with Residential Emphasis)

Alternative 3, which is similar to *Alternative 2,* emphasizes moderate employment growth in identified commercial and mixed-use nodes and centers, but places a greater relative emphasis on residential growth, particularly higher-density residential growth.

In contrast to the *No Action Alternative*, which is based on past trends and would perpetuate existing development patterns, land uses for the *Preferred Alternative/Alternative 2* and *Alternative 3*, would be driven by market opportunities and an economic development strategy. Rather than following past trends, the *Preferred Alternative/Alternative 2* and *Alternative 3* would establish a different image and land use pattern for the 20th Street SE Corridor with a strong emphasis on employment growth, economic diversification and capturing the retail spending occurring outside the City. Identified development nodes would encourage a more intensive mix of uses – in the same building, on the same site, or within the same area – through new zoning classifications. These nodes would complement concentrated commercial and employment centers in the area and provide services to local neighborhoods and beyond. Permitted uses would be more limited than at present and more focused on market opportunities. New development would be subject to subarea design guidelines to achieve the desired quality and character of the subarea. Designating the subarea as a Planned Action will provide an incentive to attract the desired type of growth.

1.2 Planned Action & Environmental Review Process

Planned Action

A Planned Action is a tool that cities can use to provide regulatory certainty and encourage economic development. This tool is permitted by state law (RCW 43.21C.031 and WAC 197-11-164), and operates by performing up-front SEPA review for a subarea plan and/or specific geographic area to streamline SEPA review for subsequent projects that are consistent with the plan. A Planned Action is designated by ordinance following preparation of an Environmental Impact Statement (EIS); the EIS evaluates the impacts of planned growth and identifies mitigation measures the City will require of the development.

Environmental Review Process

SEPA/GMA Integration. State Rules for implementing the State Environmental Policy Act (SEPA), authorize cities to combine the planning requirements of the Growth Management Act (GMA) with the environmental review requirements of SEPA in their planning processes (WAC 197-11-210). The goal of this "integration" is to ensure that consideration of environmental issues is an integral part of local planning, that it occurs early in the process, and that informed public involvement occurs. The integration rules provide flexibility regarding the timing of SEPA review and the format of planning and SEPA documents.

The City is developing a subarea plan for the 20th Street SE Corridor concurrently with the Planned Action EIS. This approach will generate environmental information early in the planning process, and allow decision makers to make planning decisions – including identification of a preferred alternative – using this information.

Prior Environmental Review. In 2006, the City prepared an integrated EIS for its 10-year Comprehensive Plan Update, which extended the planning horizon and population projections for the Comprehensive Plan. The EIS to the Comprehensive Plan identified the general (programmatic) impacts to the natural and built environment associated with the additional incremental growth. The EIS also identified a range of programmatic actions – including changes to policies and development regulations – that could mitigate potential impacts. The 2025 population and employment targets evaluated in the EIS are still the basis for City planning and for *Alternative 1* of this EIS.

The City recently issued a Planned Action FEIS on July 27, 2012 for the Lake Stevens Center Subarea Plan. The two subareas are independent projects, which are being planned and reviewed concurrently with consideration of future connections between the two subareas and related cumulative effects. Both subareas were included in a previous economic development strategy and fiscal analysis.

Scope of Environmental Review

The City initiated the SEPA process for the 20th Street SE Corridor in June 2011, by issuing a determination of significance (DS), indicating that an environmental impact statement would be prepared, and requesting comments on the scope of the EIS. A public scoping meeting was held on July 14, 2011. The scoping comment period was open from June 28 to July 22, 2011. Based on its review of comments received and other available information, the City identified the following topics for discussion in the EIS:

- **Natural Environment**
  Earth – soils, geologically hazardous areas
  Water – wetlands, streams and groundwater
  Plants & Animals – wildlife, habitat and fisheries
- **Air Quality** – greenhouse gas emissions
- **Land & Shoreline Use** – land use patterns, consistency with adopted plans & polices, population, housing and employment
- **Aesthetics/Light & Glare** – changes to visual character and impacts to views
- **Historic & Cultural Resources** – impacts to documented and potential cultural resources within the study area
- **Transportation** – vehicular and pedestrian movement, traffic congestion, parking, and public transit
- **Public Services** – police, fire, schools, parks and recreation
- **Utilities** – sewer, water, drainage and stormwater

1.3 Summary of Impacts

Table 1-2 summarizes the impacts of the EIS alternatives and is based on the analysis in Chapter 3 of the Draft EIS. It is intended to be brief and selective; the reader is directed to the complete analysis for more information.

Table 1-2 Summary of Impacts

Alternative 1 – No Action	Preferred Alternative/ Alternative 2	Alternative 3
Natural Environment	**Natural Environment**	**Natural Environment**
Earth • Clearing and grading could cause some erosion.	*Earth* • Clearing and grading could cause some erosion. Greater clearing and grading than No Action.	*Earth* • Clearing and grading could cause some erosion. Clearing and grading similar to Alternative 2.
Geologically Hazardous Areas • Erosion hazards affect 6.6 acres; 6 acres characterized as steep slopes.	*Geologically Hazardous Areas* • Erosion hazards affect 6.6 acres; 6 acres characterized as steep slopes.	*Geologically Hazardous Areas* • Erosion hazards affect 6.6 acres; 6 acres characterized as steep slopes.
Water Resources • Aquifer sensitivity of subarea is "low" and no designated recharge areas or wellhead protection areas are present. No significant impacts are anticipated. • The increase in impervious surface from development would reduce infiltration and increase runoff to surface water bodies.	*Water Resources* • Aquifer sensitivity of subarea is "low" and no designated recharge areas or wellhead protection areas are present. No significant impacts are anticipated. • The increase in impervious surface from development would be greater than No Action and would reduce infiltration and increase runoff to surface water bodies.	*Water Resources* • Aquifer sensitivity of subarea is "low" and no designated recharge areas or wellhead protection areas are present. No significant impacts are anticipated. • The increase in impervious surface from development would be similar to Alternative 2 and would reduce infiltration and increase runoff to surface water bodies.
Streams • Clearing of vegetation and increasing impervious surfaces would increase stormwater flows and carry pollutants and sediments to streams.	*Streams* • Clearing of vegetation and increasing impervious surfaces would increase stormwater flows and carry pollutants and sediments to streams. Potential impacts greater than *No Action*.	*Streams* • Clearing of vegetation and increasing impervious surfaces would increase stormwater flows and carry pollutants and sediments to streams. Potential impacts similar to *Alternative 2*.
Wetlands • Development could affect wetlands and buffers, but impacts would be limited by adopted regulations.	*Wetlands* • Development could affect wetlands and buffers, but impacts would be limited by adopted regulations.	*Wetlands* • Development could affect wetlands and buffers, but impacts would be limited by adopted regulations.
Flooding • No flooding impacts would occur.	*Flooding* • No flooding impacts would occur.	*Flooding* • No flooding impacts would occur.

Alternative 1 – No Action	Preferred Alternative/ Alternative 2	Alternative 3
Wildlife/ Habitat • Reduction in vegetation and further fragmentation of remaining habitat. • No significant impacts to threatened, endangered or candidate species would occur. • No significant impacts to fish would occur.	*Wildlife/Habitat* • Reduction in vegetation and further fragmentation of remaining habitat. Impacts greater than *No Action*, but limited by existing regulations. • No significant impacts to threatened, endangered or candidate species would occur. • Potentially greater impacts to fish compared to *No Action*, but impacts would be limited by existing regulations.	*Wildlife/Habitat* • Reduction in vegetation and further fragmentation of remaining habitat. Impacts and mitigation similar to *Alternative 2*. • No significant impacts to threatened, endangered or candidate species would occur. • Potentially greater impacts to fish compared to *No Action*, but impacts would be limited by existing regulations.
Air	**Air**	**Air**
Air Quality <u>Construction Impacts</u> • Dust from construction activities would contribute to ambient concentrations of suspended particulate matter. • Construction would require the use of heavy trucks and smaller equipment such as generators and compressors. These engines would emit air pollutants that would slightly degrade local air quality. • Some phases of construction would cause odors detectable to some people in the area, particularly during paving operations using asphalt. Impact would be short term. <u>Operational Impacts</u> • Based on projected traffic with *any alternative*, under existing (2011) or future conditions (2025), CO concentrations would be	*Air Quality* <u>Construction Impacts</u> • Dust from construction activities would contribute to ambient concentrations of suspended particulate matter. • Construction would require the use of heavy trucks and smaller equipment such as generators and compressors. These engines would emit air pollutants that would slightly degrade local air quality. Impacts greater than *No Action*. • Some phases of construction would cause odors detectable to some people in the area, particularly during paving operations using asphalt. Impact would be short term. <u>Operational Impacts</u> • Based on projected traffic with *any alternative*, under existing (2011) or future conditions (2025), CO concentrations would be	*Air Quality* <u>Construction Impacts</u> • Dust from construction activities would contribute to ambient concentrations of suspended particulate matter. • Construction would require the use of heavy trucks and smaller equipment such as generators and compressors. These engines would emit air pollutants that would slightly degrade local air quality. Impacts similar to *Alternative 2.* • Some phases of construction would cause odors detectable to some people in the area. This would be particularly true during paving operations using asphalt. Impact would be short term. <u>Operational Impacts</u> • Based on projected traffic with *any alternative*, under existing (2011) or future conditions (2025), CO concentrations would be

Alternative 1 – No Action	Preferred Alternative/ Alternative 2	Alternative 3
less than the ambient air quality standards for CO. No significant impacts to ambient air quality are likely.	less than the ambient air quality standards for CO. No significant impacts to ambient air quality are likely.	less than the ambient air quality standards for CO. No significant impacts to ambient air quality are likely.
Greenhouse Gas Emissions • The No Action Alternative would result in lower total GHG emissions than *Alternative 2* or *Alternative 3*, but would have higher GHG emissions per service area population. • The overall significance of GHG impacts at the subarea level is uncertain.	*Greenhouse Gas Emissions* • *Alternative 2* would result in the highest total GHG emissions, but would have lower emissions per service area population compared to existing conditions and *No Action*. • The overall significance of GHG impacts at the subarea level is uncertain.	*Greenhouse Gas Emissions* • *Alternative 3* would result in a higher total of GHG emissions than *No Action*, but it would have the lowest GHG emissions per service area population. • The overall significance of GHG impacts at the subarea level is uncertain.
Land Use	**Land Use**	**Land Use**
• Vacant land would be developed for urban uses, primarily single-family residential. • Minor changes to the type, form and intensity of land use would occur. The subarea would remain primarily residential in character, but could include large format retail. • Development would occur lot-by-lot, controlled by existing zoning and without the guidance of a subarea plan. Design standards would not be adopted and existing character would continue. • Gross residential density would increase from less than 1 dwelling unit (du) per acre to a high of approximately 2.4 du per acre. • Some potential for land use conflicts exists due to broad range of permitted uses in existing commercial zones.	• Vacant land would be developed for a mix of urban uses. Land would be used more intensively than with *No Action*. • The types, form and intensity of land use would change significantly. The land use pattern would include more mixed-use and mid-rise buildings, and large format retail. • Development would be guided to various nodes through a plan; new zoning regulations, design guidelines would positively influence development character. • Gross residential density would increase from 1 du per acre currently to approximately 2.2 du per acre, primarily in multifamily buildings. • Land uses would be guided to identified activity nodes; uses within the activity nodes would generally be complementary in character and no significant	• Vacant land would be developed for a mix of urban uses. Land would be used more intensively than with *No Action*. • The types, form and intensity of land use would change significantly. The land use pattern would include more mixed-use and mid-rise buildings, and large format retail. • Development would be guided to various nodes of activity through a plan; new zoning regulations, design guidelines would positively influence development character. • Gross residential density would increase from 1 du per acre currently to approximately 2.7 du per acre, primarily in multifamily buildings. • Land uses would be guided to identified activity nodes uses within the activity nodes would generally be complementary in character and no significant land use

Alternative 1 – No Action	Preferred Alternative/ Alternative 2	Alternative 3
	land use conflicts are anticipated.	conflicts are anticipated.
• Without adoption of subarea plans for 20th Street SE and Lake Stevens Center, growth would be less focused in designated centers.	• Adoption of subarea plans for 20th Street SE and Lake Stevens Center would help focus growth in designated centers, consistent with the Comprehensive Plan and regional growth policies.	• Adoption of subarea plans for 20th Street SE and Lake Stevens Center would help focus growth in designated centers, consistent with the Comprehensive Plan and regional growth policies.
• Construction would cause short-term impacts such as dust, noise, and temporary interruptions in access.	• Construction would cause short-term impacts, including dust, noise, and temporary interruptions in access. Impacts more extensive than *No Action*.	• Construction would cause short-term impacts, including dust, noise, and temporary interruptions in access. Impacts similar to *Alternative 2*.
Population, Housing & Employment	**Population, Housing & Employment**	**Population, Housing & Employment**
Population • Population increase of 1,722-3,444 from existing over 20 years; within City's 2025 population target. *Housing* • Housing increase of 600-1,200 units. *Employment* • Increase of 360-465 jobs over 20 years.	*Population* • Population increase of 2,600-2,900 from existing; within City's 2025 population target. *Housing* • Housing increase of 900-1,000 units from existing. *Employment* • Greatest focus on employment uses, with increase of 3,800-4,500 jobs.	*Population* • Population increase of 3,500-4,000 from existing; within City's 2025 population target. *Housing* • Greater emphasis on housing, with increase of 1,200-1,400 units from existing. *Employment* • More balance between housing and employment uses, with Increase of 3,500-4,000 jobs.
Aesthetics	**Aesthetics**	**Aesthetics**
Visual Character • Existing character would change incrementally over time as development occurs. Some larger multifamily and commercial buildings would develop but most development would be single-family. • No new regulations or design guidelines would be adopted to influence design.	*Visual Character* • Visual character would change significantly over time as subarea develops with a mix of more intensive urban uses. • Design guidelines would be adopted and would help establish consistent approach to design of sites, streetscape, landscaping	*Visual Character* • Visual character would change significantly over time as subarea develops with a mix of more intensive urban uses. Impacts would be similar to *Alternative 2*. • Impacts would be similar to *Alternative 2*. Design guidelines would be adopted and would help establish consistent

Alternative 1 – No Action	Preferred Alternative/ Alternative 2	Alternative 3
• Landscaping per existing regulations. *Views* • No significant impacts to views from public parks or spaces, which are limited. *Light & Glare* • Increase in lighting, but no significant impacts are anticipated. • Some potential for shadowing from larger buildings.	and lighting. • More substantial landscaping than *No Action*. *Views* • Potential for greater view blockage from larger buildings. Subarea plan includes potential to locate parks and open space to capture views, and to protect view corridors through design review. *Light & Glare* • Increase in lighting, but no significant impacts are anticipated. Lighting design would be addressed in design guidelines. • Greater potential for shadowing from larger buildings. Shadow impacts would be addressed in design guidelines.	approach to design of sites, streetscape, landscaping and lighting. • More substantial landscaping, similar to *Alternative 2*. *Views* • Impacts would be similar to *Alternative 2*. Potential to locate parks and open space to capture views, and to protect view corridors through design review. *Light & Glare* • Increase in lighting, but no significant impacts are anticipated. Lighting design would be addressed in design guidelines. • Impacts similar to *Alternative 2.* Greater potential for shadowing from larger buildings. Shadow impacts would be addressed in design guidelines.
Cultural Resources	**Cultural Resources**	**Cultural Resources**
• Potential for impacts to identified and unidentified resources.	• Potential for impacts to identified and unidentified resources.	• Potential for impacts to identified and unidentified resources.
Transportation	**Transportation**	**Transportation**
Roadway Operations PM peak hour Level of Service (LOS) would be degraded at the following intersections: • 20th St SE/Cavalero Rd (F) • 20th St SE/SR-9 (E) AM peak hour Level of Service would be degraded at the following intersections: • SR-9/20th Street SE (D), • 20th St SE/83rd Ave SE (E)	*Roadway Operations* PM peak hour Level of Service (LOS) would be degraded at the following intersections: • 20th St SE/Cavalero Rd (F) • 20th St SE/91st Ave SE (E) • 20th St SE/SR-9 (F) AM peak hour Level of Service would be degraded at the following intersections: • 20th Street SE/79th Ave SE (D)	*Roadway Operations* PM peak hour Level of Service (LOS) would be degraded at the following intersections: • 20th St SE/Cavalero Rd (F) • 20th St SE/91st Ave SE (D) • 20th St SE/SR-9 (F) • 20th St SE/S Lake Stevens Rd (D) AM peak hour Level of Service would be degraded at the following intersections: • 20th Street SE/79th Ave SE (D)

Alternative 1 – No Action	Preferred Alternative/ Alternative 2	Alternative 3
	• 20th St SE/83rd Ave SE (F) • 20th St SE/SR-9 (F) • 20th St SE/S Lake Stevens Rd (D)	• 20th St SE/83rd Ave SE (F) • 20th St SE/SR-9 (E)
Pedestrian and Bicycle System • The *No Action Alternative* is not anticipated to interfere with any existing or planned pedestrian or bicycle facilities. Overall traffic growth would result in more pedestrian and bicycle interactions.	*Pedestrian and Bicycle System* • *Alternative 2* is not anticipated to interfere with any existing or planned pedestrian or bicycle facilities. Proposed improvements (new bicycle lanes, sidewalks, landscaping, and off-street trails) would substantially improve the quality of the pedestrian and bicycle system when compared to the *No Action Alternative*.	*Pedestrian and Bicycle System* • *Alternative 3* is not anticipated to interfere with any existing or planned pedestrian or bicycle facilities. Proposed improvements (new bicycle lanes, sidewalks, landscaping, and off-street trails) would substantially improve the quality of the pedestrian and bicycle system when compared to the *No Action Alternative*.
Transit • No transit routes are expected to be adversely affected. Vehicle operations may be slower due to increased traffic congestion.	*Transit* • No transit routes are expected to be adversely affected. Vehicle operations may be slower due to increased traffic congestion.	*Transit* • No transit routes are expected to be adversely affected. Vehicle operations may be slower due to increased traffic congestion.
Public Services	**Public Services**	**Public Services**
• Public service impacts would generally be proportional to population increase.	• Public service impacts would generally be proportional to population increase.	• Public service impacts would generally be proportional to population increase.
Police Service • Calls for service would increase. • Need for 2.3-4.6 additional officers per adopted level of service, and additional equipment and facility space. Needs are addressed in the adopted CIP.	*Police Service* • Calls for service would increase. • Need for 3.5-3.9 additional officers per adopted level of service, and additional equipment and facility space. Needs are addressed in the adopted CIP.	*Police Service* • Calls for service would increase. • Need for 4.19-4.67 additional officers per adopted level of service, additional equipment and facility space. Needs are addressed in the adopted CIP.
Fire & EMS • Calls for service would increase, generating need for additional firefighters	*Fire & EMS* • Calls for service would increase, generating need for additional firefighters	*Fire & EMS* • Calls for service would increase, generating need for additional firefighters

Alternative 1 – No Action	Preferred Alternative/ Alternative 2	Alternative 3
and equipment. • A ladder truck would be required for any development above two stories. *Schools* • Housing growth could generate between 86 and 171 additional students, depending on the type, number and size of housing units. Growth is addressed in school district's CFP. • Construction could have temporary impacts for school bus routes. *Parks & Recreation* • Subarea growth would require between 13 and 26 acres of park land, based on the City's adopted LOS. • Existing park facilities would be used more intensively.	and equipment. • A ladder truck would be required for any development above two stories. • Response times could be reduced for a more concentrated, higher density development pattern. *Schools* • Housing growth could generate between 75 and 83 additional students, depending on the type, number and size of housing units. Growth is addressed in school district's CFP. • Construction could have temporary impacts for school bus routes. *Parks & Recreation* • Subarea growth would require between 20 and 22 acres of park land based on the City's adopted LOS. • Existing park facilities would be used more intensively. • The utility corridor could provide locations for 8-10 acres of public parks and trails. New residential and commercial areas could provide additional parks and open spaces.	and equipment. • A ladder truck would be required for any development above two stories. • Response times could be reduced for a more concentrated, higher density development pattern. *Schools* • Housing growth could generate between 100 and 116 additional students, depending on the type, number and size of housing units. Growth is addressed in school district's CFP. • Construction could have temporary impacts for school bus routes. *Parks & Recreation* • Subarea growth would require between 26 and 30 acres of park land based on the City's adopted LOS. • Existing park facilities would be used more intensively. • The utility corridor could provide locations for 8-10 acres of public parks and trails. New residential and commercial areas could provide additional parks and open spaces.
Utilities	**Utilities**	**Utilities**
Stormwater & Drainage • Development would result in increases in impervious surface and clearing which would increase stormwater runoff and could degrade water quality. The City would review development proposals and apply its adopted stormwater	*Stormwater & Drainage* • Development would increase impervious surface and clearing which would increase stormwater runoff and could degrade water quality. The City would review development proposals and apply its adopted stormwater	*Stormwater & Drainage* • Development would increase impervious surface and clearing which would increase stormwater runoff and could degrade water quality. The City would review development proposals and apply its adopted stormwater

Alternative 1 – No Action	Preferred Alternative/ Alternative 2	Alternative 3
regulations to ensure that no significant impacts occur.	regulations to ensure that no significant impacts occur.	regulations to ensure that no significant impacts occur.
Water	*Water*	*Water*
• Projected increase in water demand from development (713-1,346 equivalent residential units/134,040-253,035 gallons per day) represents 18% of available water supply. No significant impact would occur.	• Projected increase in water demand from development (2,093-2,412 equivalent residential units/393,400-453,500 gallons per day) represents 32.5% of available water supply. No significant impact would occur. Additional water supply may be necessary to serve long-term growth.	• Projected increase in water demand from development (1,953-2,341 equivalent residential units/367,200-440,200 gallons per day) represents 31.5% of available water supply. No significant impact would occur. Additional water supply may be necessary to serve long-term growth.
• Planned improvements in 2012 and 2018 would provide sufficient water storage; increase in required storage would not result in significant impacts to the system.	• Planned improvements in 2012 and 2018 would provide sufficient water storage; increase in required storage would not result in significant impacts to the system. Planned development could consume approximately 1/3 of available surplus.	• Planned improvements in 2012 and 2018 would provide sufficient water storage; increase in required storage would not result in significant impacts to the system. Planned development could consume approximately 1/3 of available surplus.
• Additional distribution facilities would be required to serve new development.	• Additional distribution facilities would be required to serve new development.	• Additional distribution facilities would be required to serve new development.
• Some upgrading of fire flow conveyance systems (pipes) could be required in specific areas, depending on the type and intensity of development. Project-specific needs would be determined by the City, PUD and Fire Marshall in conjunction with development review.	• Some upgrading of fire flow conveyance systems (pipes) could be required in specific areas, depending on the type and intensity of development. Project-specific needs would be determined by the City, PUD and Fire Marshall in conjunction with development review.	• Some upgrading of fire flow conveyance systems (pipes) could be required in specific areas, depending on the type and intensity of development. Project-specific needs would be determined by the City, PUD and Fire Marshall in conjunction with development review.
Sewer	*Sewer*	*Sewer*
• Growth would increase the demand for sewerage collection and treatment, but are within the capacity of the existing and planned system; no significant impacts would occur.	• Growth would increase sewerage flows and loadings (up to 104%) but are within the capacity of the existing and planned treatment system; no significant impacts would occur.	• Growth would increase sewerage flows and loadings (353%-361%) but are within the capacity of the existing and planned system; no significant impacts would occur.

Alternative 1 – No Action	Preferred Alternative/ Alternative 2	Alternative 3
• A planned upgrade of Lift Station 11 would address an existing deficiency. • Portions of the subarea are not currently sewered, and additional collection lines will be required to provide service.	• A planned upgrade of Lift Station 11 would address an existing deficiency. • Portions of the subarea are not currently sewered, and additional collection lines will be required to provide service.	• A planned upgrade of Lift Station 11 would address an existing deficiency. • Portions of the subarea are not currently sewered, and additional collection lines will be required to provide service.

1.4 Mitigation Measures

1.4.1 Natural Environment

Earth

Applicable Regulations and Commitments

- ***Geological Assessments Required*:** The Lake Stevens Municipal Code (LSMC 14.88.630) requires a geological assessment for any development proposal within 200 feet of an area designated as geologically hazardous. Geological assessments must analyze potential impacts to geologically hazardous areas resulting from the proposed development and identify appropriate mitigation measures necessary to protect development and the geologically hazardous area.

- ***Native Growth Protection Area*:** LSMC 14.88.670 requires developers to place geologically hazardous areas not approved for alteration and their buffers in a native growth protection area; lawfully altered geologically hazardous areas are subject to a covenant of notification and indemnification/hold harmless agreement.

- ***Erosion Control Measures Required*:** LSMC 14.64.130 requires the implementation of sedimentation and erosion control measures for any development that would entail land disturbance. The Public Works Director must review and approve erosion control plans.

Additional Mitigation Measures

- No additional measures are required.

Water Resources

Applicable Regulations and Commitments

- ***Stormwater Management*:** The City's municipal code requires the use of natural drainage systems to the extent feasible in order to preserve natural topography (LSMC 14.64.100). The Code also requires all new stormwater drainage systems to

be constructed in accordance with the requirements of the Department of Ecology's 2005 Stormwater Management Manual for Western Washington (LSMC 11.06.020 and LSMC 14.64.140). Continued implementation of the City's stormwater management codes will ensure a rigorous permit review process that promotes sound development and redevelopment policies; continued protection of water quality in the City's lakes, streams and wetlands habitats and groundwater recharge; property protection from increased runoff; and the promotion of low impact development strategies that reduce impervious surface and stormwater runoff.

- ***NPDES Phase II Municipal Stormwater Permit*:** The Western Washington Phase II Municipal Stormwater Permit was issued in 2007 to implement the requirements of the Clean Water Act and the National Pollutant Discharge Elimination System as codified in Sections 11.06.020 and 14.64.140 of the City's municipal code. In accordance with the requirements of the permit, the City of Lake Stevens has adopted a stormwater management plan focused on public education and outreach, detection and elimination of illicit stormwater discharge, controlling runoff generated by new development activities, and prevention of pollution resulting from municipal activities. Continued implementation of the measures contained in the stormwater management program would reduce pollutant loading and improve water quality in the City's lakes, streams and wetlands.

- ***Critical Areas Regulations*:** Under all alternatives, future development will be subject to the adopted critical areas regulations found in Chapter 14.88 LSMC, including all applicable mitigation requirements and mitigation sequencing procedures.

Additional Mitigation Measures

- ***Stormwater Detention*:** For properties adjacent to identified wetlands and their buffers, new development and redevelopment cannot result in an increased rate of runoff from the site to the wetland. Where onsite stormwater management is not feasible, the City may, consistent with federal and state regulations, encourage design and construction of regional stormwater detention and infiltration infrastructure.

- ***Low Impact Development (LID)*:** The City is proposing incentives in the subarea plan and development regulations for the use of LID techniques to reduce stormwater impacts in the subarea plan and new zoning regulations.

- ***Critical Areas*:** More detailed analysis – including full delineation, classification and function assessment – will be required in conjunction with development permitting for future projects that occur on sites containing critical areas.

- ***Wetland Mitigation Banking*:** LSMC 14.88.840 allows the use of credits from a state approved wetland mitigation bank to compensate for unavoidable impacts to wetlands. Per LSMC 14.88.840(a)(5), projects using mitigation credits must be consistent with the replacement ratios specified in the mitigation bank's certification. If mitigation credits are not available and establishment of a separate mitigation bank is not feasible, the City could encourage preservation and enhancement of those areas in exchange for increased development potential in other portions of the site or subarea.

Plants & Animals

Applicable Regulations and Commitments

- ***Tree Retention*:** The City's land use code (LSMC 14.76.120) requires development projects to retain existing significant trees and stands of trees that occur on the development site. The code also requires that removed significant trees be replaced and that retained and replanted trees be protected during construction. Similarly, the code requires retention or planting of trees along dedicated streets (LSMC 14.76.110).

- ***Critical Areas Regulations*:** Future development in the study area has the potential to adversely affect wildlife and habitat through clearing of vegetated areas. However, the City's critical areas regulations (Chapter 14.88 LSMC) protect wetlands, riparian areas, and other critical areas that provide habitat for plants and animals by limiting the activities allowed within the critical area and establishing appropriate protective buffers and mitigation strategies for unavoidable impacts.

1.4.2 Air Quality

Air Quality

Mitigation During Construction

Although significant air quality impacts from construction are not anticipated with any of the alternatives, construction contractors would be required to comply with all relevant federal, state, and local air quality rules. In addition, implementation of best management practices would also reduce emissions related to the construction phase of the project. The Washington Associated General Contractors brochure *Guide to Handling Fugitive Dust from Construction Projects* and the PSCAA suggest a number of methods for controlling dust and reducing the potential exposure of people to emissions from diesel equipment during construction. A list of possible control measures is included in the Air Quality section (3.2) of the Draft EIS.

Mitigation During Operation

The air quality analysis indicates that the alternatives would not result in any significant adverse air quality impacts in the study area. Consequently, no operational impact mitigation measures are warranted or proposed.

Greenhouse Gas Emissions

Some or all of the following strategies for reducing GHG could be implemented:

- Adopt green building standards for new development (e.g., LEED silver or better);
- Consider a commute trip reduction program for qualifying employers in the 20th Street SE Corridor Subarea as a future implementation measure if employers meet the size threshold established by state law;
- Expand transit options such as the Community Transit vanpool program or new fixed route bus service; and
- Implement efficient transportation design standards including the use of roundabouts and LED street lighting and area lighting where appropriate.

1.4.3 Land Use

Many of the land use changes identified in the Land Use section (3.3) of the Draft EIS – including increased density/intensity and a greater diversification and mix of land uses – are not considered adverse impacts. The change in the subarea's land use pattern would be significant, but does not require mitigation.

Potential land use conflicts, between proximate land uses of different intensity, can be avoided or otherwise mitigated through the application of proposed development regulations and design guidelines and standards that ensure appropriate land uses along with adequate buffering and transitions between different abutting land uses. For example, height and bulk limits and setback requirements in zoning regulations will address potential conflicts. Landscaping requirements can also help to buffer and screen land uses of dissimilar intensity or scale. Design guidelines provide approaches to site planning and building design, which also reduce potential impacts. These techniques are an integral aspect of implementing the subarea plan.

1.4.4 Population, Housing & Employment

Population

No significant adverse impacts have been identified and no mitigation is necessary.

Housing

No significant adverse impacts have been identified and no mitigation is necessary.

Employment

No significant adverse impacts have been identified and no mitigation is necessary.

1.4.5 Aesthetics, Light & Glare

Visual Character

- **Development Regulations**: New zoning regulations in combination with specific design guidelines would address appropriate uses, height, setbacks, and similar development parameters. The proposed code also includes incentives, such as bonuses in height or intensity, in exchange for incorporating a menu of public amenities in new development. Revised landscaping standards would help create the desired character for development sites, roads, and sidewalks and trails. Existing tree protection/replacement requirements ensure the subarea maintains a desirable amount of vegetative cover.
- **Design Guidelines**: Design guidelines would ensure that future development achieves a cohesive visual character and high-quality site planning, building design, lighting and signage.

Views

- **Park & Open Space Planning**: The City will update its *Parks & Open Space Plan* to address needs created by planned growth in the 20th Street SE Corridor Subarea. In conjunction with this planning, the City may identify new parks or open space areas that provide views of landscape features and determine that these views should not be obstructed from specified viewpoints. New development in some portions of the subarea may also create public spaces that provide open views of the landscape.
- **Design Guidelines**: The City could consider adopting guidelines and standards that identify when and how site plans or building design could be modified to protect views from parks and other public spaces.

Light & Glare

- **Development Regulations**: New development regulations require compliance with "dark sky" regulations to minimize lighting increases and night glow in the subarea (LSMC 14.38.080(a)).
- **Design Guidelines**: Proposed design guidelines provide guidance on avoiding light spillage, glare and shadow impacts though site planning, building design and landscaping.

1.4.6 Historic & Cultural Resources

Applicable Regulations and Commitments

- ***Chapter 27.53 RCW*:** Washington State Law prohibits the disturbance, destruction, or removal of historic or prehistoric archaeological deposits without approval from Department of Archaeology and Historic Preservation (DAHP). Persons who violate the terms of this statue are subject to both criminal and civil liability.

Additional Mitigation Measures

- ***Archaeological Survey***: As part of the development review process, the City would require an archaeological survey for properties in the same general vicinity as the

known archaeological site, and for properties, which display a similar history of logging activity, to determine the presence of archaeological or historic resources.

- ***Development Agreements*:** The City may consider the use of development agreements, per LSMC 14.16C.055, for any properties with known archaeological or historic resources. Such a development agreement could include mitigation measures to protect archaeological resources, such as a memorandum of agreement with DAHP regarding research and curation of artifacts, as well as construction monitoring by a qualified archaeologist.
- ***Inadvertent Discovery Plan*:** For development proposals on properties that are extensively forested, previously undeveloped, or known to be associated with the historic railroad or historic logging operations, the City would require the preparation of an inadvertent discovery plan to establish protocols for handling archaeological deposits uncovered during construction.

1.4.7 Transportation

Concurrency

The GMA includes provisions, referred to as "concurrency," to ensure that sufficient public facilities are available for new development. Local jurisdictions must also establish level of service (LOS) standards for operation of transportation facilities, which also help to measure a project's potential impact. If the trips generated by a proposal will cause a facility to fall below the adopted LOS standard, the local jurisdiction may deny permits for the project, change the LOS standard, or modify the land use. Lake Stevens' adopted concurrency management system, set forth in LSMC 14.110, identifies three options an applicant may select to maintain concurrency when mitigation is required: (1) reducing the size of the development; (2) delaying the development until needed improvements are provided by the City or others; or (3) constructing the needed facilities. Per the GMA, concurrency does not apply to highways of statewide significance, such as SR-9.

Level of Service Threshold

Maintaining the City's current LOS C conditions at all intersections in the study area would be financially prohibitive. The City's transportation consultant, Fehr & Peers, recognized this in their analysis and recommended that the City revise its standard as part of the subarea plan. The transportation improvements proposed for the subarea were developed under the premise of a reduced LOS. To address subarea transportation needs, and to help ensure that desired development occurs, the City is considering a system-level LOS standard of "E." However, based on the discretion of the Public Works Director, intersections that are built to their ultimate size would be allowed to operate at LOS F as long as other programmatic mitigation measures to reduce trip generation are implemented.

For uncontrolled and unsignalized intersections, it is recommended that an intersection be considered deficient if it falls below LOS E and meets a signal warrant. This level of service

is more realistic to maintain, is consistent with the Comprehensive Plan, and is in line with typical traffic activity seen in economically vibrant areas.

If the recommended LOS thresholds are adopted, then only the following intersections would be considered deficient or impacted:

- 20th Street SE and Cavalero Road under *all alternatives* during the PM peak hour;
- 20th Street and 83rd Avenue SE under *Alternatives 2* and *3* during the AM peak hour; and
- 20th Street SE and SR-9 under *Alternative 2* during the AM and PM peak hours, and under *Alternative 3* during the PM peak hour.

Intersection-Specific Mitigation Measures

20th Street SE and Cavalero Road

A signal should be added to the intersection of 20th Street SE and Cavalero Road. Future traffic volumes would fulfill the requirements for a peak hour signal warrant under all three land use alternatives. Under the *Preferred Alternative/ Alternative 2* during the PM peak hour, signalizing the intersection would improve operations to LOS C.

20th Street and 83rd Avenue SE

This intersection would operate at LOS F under the *Preferred Alternative/Alternative 2* and *Alternative 3* during the AM peak hour. Adding a southbound right turn pocket would improve the intersection's overall LOS to D with 52 seconds of delay. If a left turn pocket could be added to the northbound approach, delay would decrease by an additional 12 seconds, although overall LOS would still remain at D.

20th Street SE and SR-9

This intersection is under the jurisdiction of WSDOT and mitigation measures would likely be identified as part of the *SR-9 Corridor Planning Study*.

Design Alternatives

The Draft EIS Transportation section (3.8) discusses a number of design options (e.g., roundabouts, signalization) for improvements to the intersections along the 20th Street SE Corridor. Please refer to the Draft EIS for more information.

Additional Mitigation Measures

In addition to the capacity enhancing projects described above, it is recommended that the City of Lake Stevens explore the potential for other programmatic mitigation measures identified below.

Impact Fees

To generate the funds necessary to implement the mitigation measures described above and to address identified impacts, a traffic impact fee is proposed to be established for the subarea, as authorized by RCW 82.02.050. The City should also consider developing an interlocal agreement with WSDOT that would allow the City and WSDOT to share fee revenues and help construct the required improvements.

Transportation Benefit District
Formation of a Transportation Benefit District (TBD), as authorized by RCW 36.73.120, is another approach the City could use to help finance transportation improvements. Formation of a TBD would enable the City to assess additional fees and charges within the district, including a supplemental sales tax. A TBD could apply citywide or specific to 20th Street SE Corridor, and could be used in conjunction with a traffic impact fee.

Transportation Demand Management
Transportation demand management (TDM) strategies include commute trip reduction programs and enhanced transit service. These measures have proven to be effective at reducing trip generation.

1.4.8 Public Services
Under all alternatives, development would be subject to adopted development regulations, which require emergency access, fire suppression systems, and school and park impact mitigation fees to offset impacts to these services. The *Preferred Alternative/Alternative 2* and A*lternative 3* could incorporate the following additional measures:

- During construction, implement security measures such as onsite lighting, fencing, onsite surveillance, etc. to reduce potential criminal activity.
- Construct a well-designed internal street system that provides fast and efficient police, fire and emergency vehicle access to all areas of the subarea.
- Develop streets, sidewalks, walkways, bicycle and pedestrian paths and public spaces designed to promote public safety and visibility for residents, employees, site visitors and police.
- Design all parking areas and public spaces with specially designed no-glare security lighting to provide for security.
- Include incentives in development regulations for providing public spaces in new development.
- Begin a planning process to identify additional park space within the subarea. Identify land that is suitable for acquisition, and investigate the potential for acquiring easements within the utility corridor.

1.4.9 Utilities

Drainage

Applicable Regulations and Commitments

- ***City of Lake Stevens Stormwater Ordinance*:** Chapter 11.06 and Chapter 14.64 (Part II) of the Lake Stevens Municipal Code adopt the *Department of Ecology's 2005 Stormwater Management Manual for Western Washington*. Any project that meets or exceeds the thresholds defined in the manual for new impervious area, drainage system modifications, or redevelopment is subject to City review and permit approval.
- ***Ecology Stormwater Manual*:** The City has adopted the *Department of Ecology's 2005 Stormwater Management Manual for Western Washington* as its minimum design standard for stormwater infrastructure. All development meeting the minimum thresholds is required to design associated stormwater infrastructure to be consistent with these standards.
- ***Low Impact Development*:** The City's stormwater ordinance states that Low Impact Development solutions, as defined and listed in the LID Technical Guidance Manual for Puget Sound, are acceptable and encouraged alternative standards for management of stormwater.

Additional Mitigation Measures

- ***Incentives for Low Impact Development*:** Proposed development regulations include an incentive, in the form of a FAR bonus, to encourage use of LID techniques for onsite stormwater treatment and detention for appropriate projects.

Water

Applicable Regulations and Commitments

- ***Supply Upgrades*:** Snohomish County PUD's *2011 Water System Plan* identifies necessary capital improvements to provide adequate water supply for the next 20 years. Planned and budgeted supply improvements include conversion of the system's two emergency groundwater wells to a full-time source, increasing system supply by approximately 1.2 MG per day.
- ***Storage Upgrades*:** The PUD's *2011 Water System Plan* identifies the following planned and budgeted capital improvements to storage capacity:
    - Walker Hill Booster Zone Intertie: Eliminates dead storage in the Walker Hill tanks, making this water available to the Lake Stevens 500 pressure zone for emergency use. (2012)
    - Getchell Reservoir: New 9.2 MG reservoir serving the Lake Stevens 500 pressure zone.

- ***Distribution Upgrades*:** The PUD's ongoing water main replacement program annually evaluates aging pipes for replacement with a focus on the replacement of galvanized iron/steel and asbestos cement pipes.

Additional Mitigation Measures

- ***Joint Planning with Snohomish County PUD*:** The City should consult with Snohomish County PUD to establish a joint planning process for capital improvements necessary to serve anticipated development in the subarea.
- ***Design Review for Fire Flow*:** The City and developers would coordinate development permit application with Snohomish County PUD and the Lake Stevens Fire Marshal to determine fire flow requirements based on project design. Upgrades to existing lines would be coordinated with Snohomish County PUD. Installation of new water lines adequate to provide required fire flows would be the responsibility of the developer.
    - 12-inch pipes and 3000 gpm for commercial areas, possibly multifamily;
    - 8-inch pipes and 1500 gpm for existing residential areas; and
    - intermediate value for other areas, for example 10-inch pipe with 2000 gpm.

Sewer

Applicable Regulations and Commitments

- ***Planned Capital Improvements*:** The Lake Stevens Sewer District updated its Comprehensive Plan in 2007 and 2010, describing the capital improvements planned for the near future, including several pipeline expansions, decommissioning of several lift stations, pump upgrades, and construction of a new wastewater treatment plant. These improvements are designed to relieve existing system deficiencies and create the capacity necessary to serve future development.

Additional Mitigation Measures

- ***Joint Planning with Lake Stevens Sewer District*:** The City coordinates with the Lake Stevens Sewer District to jointly plan for capital improvements necessary to serve anticipated development in the subarea, including new wastewater collection infrastructure and future expansions to the new treatment plant that may be necessary to accept projected flows from development under the subarea plan.

1.5 Significant Unavoidable Adverse Impacts

1.5.1 Natural Environment

All alternatives could result in additional development within the subarea, thereby increasing the level of impervious surface and reducing vegetated areas. Additional development within the study area is also anticipated to generate increased stormwater runoff that must by detained or treated before discharge to surface water. With application of the City's adopted regulations regarding critical areas, stormwater, and tree retention, as well as proposed mitigation measures, no significant unavoidable adverse impacts to the natural environment are anticipated.

1.5.2 Air Quality

No significant unavoidable adverse impacts have been identified for air quality or greenhouse gas emissions and none are anticipated.

1.5.3 Land Use

The land use pattern of the subarea would change significantly to accomplish the objectives of *Alternative 2* or *Alternative 3.* This would result in the subarea becoming more urbanized and intensively developed, with a greater mix of uses. The area would experience a significant increase in employment uses and population relative to the *No Action Alternative*. This change, while significant, is not considered adverse.

1.5.4 Population, Housing & Employment

While population growth is unavoidable, it is not necessarily an adverse impact. No significant unavoidable adverse impacts would occur.

1.5.5 Aesthetics, Light & Glare

Visual Character

The visual character of the subarea would change significantly over time as a result of growth and development. The direction of change would be from a primarily single-family residential area with large lots to an area that includes a mixed-use employment district alongside residential neighborhoods. It would become more densely developed and urban in character with taller, larger scale buildings. This change could be considered adverse by some viewers and positive by others, but this change is an unavoidable consequence of implementing the subarea plan.

Views

Some existing views to the west from locations in the western portion of the subarea could be partially or completely obstructed by future development. View blockage could be mitigated through use of new development regulations, however, this impact is not considered unavoidable. The subarea plan, and future planning for parks and open spaces, could focus on identifying future public spaces from which views could be protected through design guidelines and standards.

Light & Glare
Lighting will increase, but will be controlled through development regulations and design guidelines. No significant unavoidable adverse impacts are anticipated.

1.5.6 Historic & Cultural Resources
Although the subarea is believed to have a low probability for discovery of archaeological resources, there is some potential for undiscovered archaeological resources to be inadvertently destroyed during construction. This is neither certain to occur nor unavoidable, however. With implementation of appropriate mitigation measures, no significant unavoidable adverse impacts are anticipated.

1.5.7 Transportation
As described above, the increased traffic volumes caused by the action alternatives (*Alternative 2* and *Alternative 3*), lead to increased delay at the 20th Street SE/SR-9 intersection. Since WSDOT has not yet defined its plan to improve traffic conditions along SR-9, specific mitigation measures cannot be identified. Given that WSDOT is actively planning to improve the SR-9 corridor and some level of mitigation is possible (although full improvement to provide LOS D conditions is unlikely because of the high costs), impacts are not necessarily inevitable or entirely unavoidable.

Similarly, Lake Stevens does not own or control the intersection of South Lake Stevens Road/24th Street SE/SR-9. While the analysis in this document showed that a traffic signal or multi-lane roundabout would operate acceptably at this location, this improvement has not been approved by WSDOT and there is no certainty that it will be implemented. If a full access intersection is not provided at this location, turning movements will be added to the 20th Street SE/SR-9 intersection, further exacerbating poor operations at that location.

1.5.8 Public Services
Demand for public services would increase incrementally in conjunction with the additional population and commercial growth expected to locate in the subarea. Any additional needs would be addressed in the City's Capital Facilities Plan and are not unavoidable.

1.5.9 Utilities
All alternatives are anticipated to result in additional development within the subarea, thereby increasing demand for water, sewer, and stormwater services. An increase in population and employment in the study area could exacerbate existing water and wastewater system deficiencies and increase demand for services beyond the capacity of existing infrastructure in some limited areas. However, with application of mitigation measures, which include both regulatory measures and planned capital improvements, no significant unavoidable adverse impacts are anticipated.

1.6 Benefits & Disadvantages of Delaying the Proposed Action

Subarea planning is an element of the City's conscious strategy to grow and diversify the local economy. Benefits of the proposed action, and the objectives of the subarea plan, include additional retail and services, expanded housing, increased employment opportunities, and concentrated growth in a mixed-use center. From an economic development perspective, the proposal seeks to attract a greater amount of regional employment to the City, and to use the subarea plan and planned action to create an attractive environment and incentives for development.

Delaying the proposed subarea plan would be equivalent to implementing the *No Action Alternative*, and would result in these possible benefits being postponed or potentially lost. Growth in the City would also be relatively more dispersed and less concentrated in centers. At the same time, lower levels of growth would create lower demand for public services and capital facilities.

1.7 Issues to be Resolved

Issues raised by the subarea plan include determining the appropriate types, intensity and overall magnitude of development for the subarea, and how this could change the existing character of the area.

2. DESCRIPTION OF PROPOSAL AND ALTERNATIVES

2.1 Overview of the Proposed Action

The City of Lake Stevens will consider the following actions and approvals:

1. Adopting a subarea plan, pursuant to the Revised Code of Washington (RCW) 36.70A.080, for the 20th Street SE Corridor Subarea, which will amend and become an element of the Lake Stevens Comprehensive Plan. The subarea plan includes goals, policies, a land use map and design guidelines;
2. Revising the land use code (Title 14 LSMC) text to adopt new classifications and development standards; and adopting other implementing regulations including a traffic impact fee;
3. Amending the zoning map to rezone properties consistent with the subarea plan;
4. Amending the Comprehensive Plan's Transportation Element and Capital Facilities Element to address infrastructure needs required to support planned growth in the subarea; and
5. Adopting an ordinance designating the subarea as a Planned Action, pursuant to the State Environmental Policy Act (SEPA) specifically RCW 43.21C.031, and the SEPA Rules, specifically Washington Administrative Code (WAC 197-11-164), for purposes of future environmental review and permitting.

Study Area

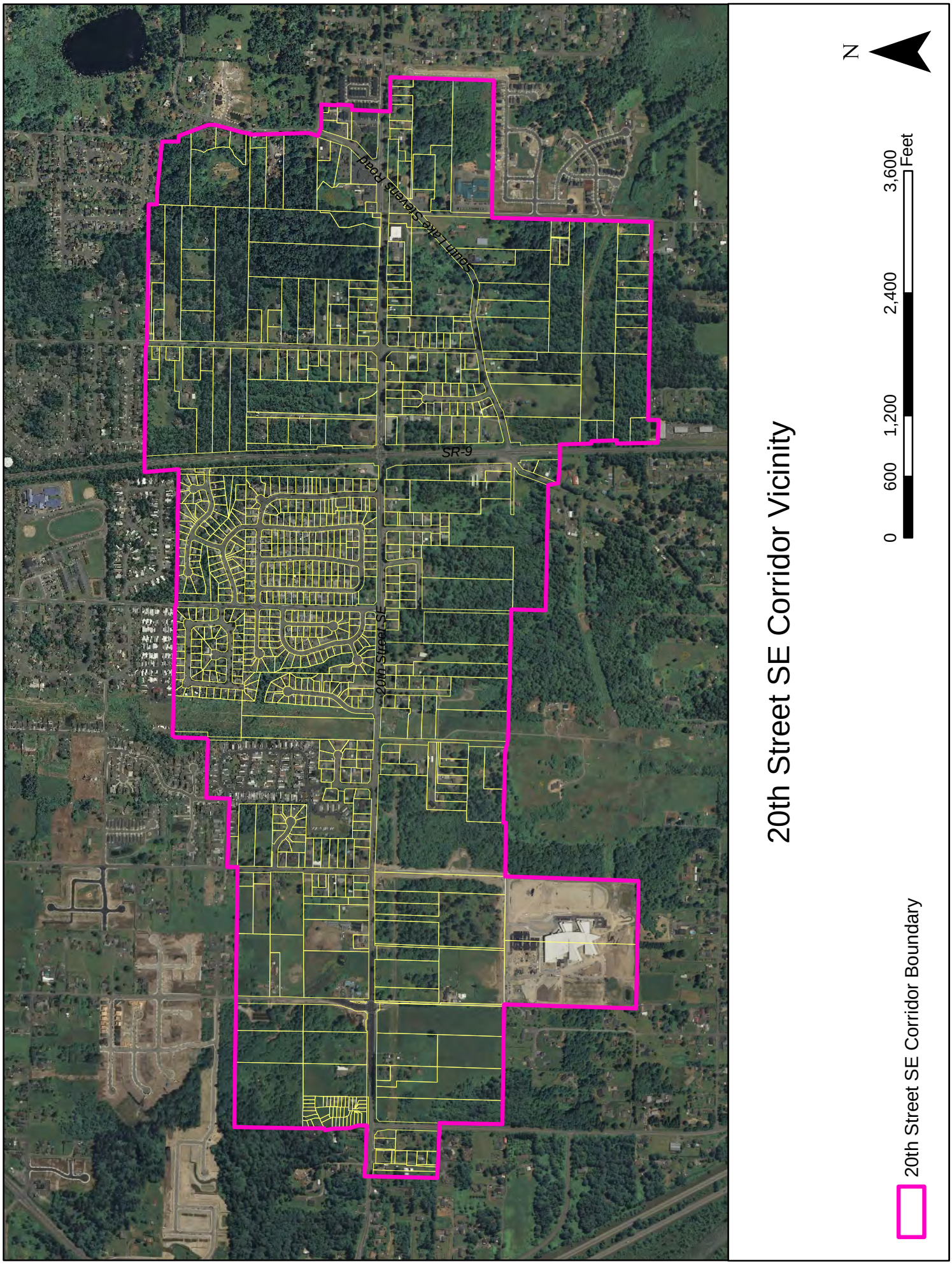
The City of Lake Stevens is located in Snohomish County, approximately six miles east of downtown Everett. The 20th Street SE Corridor crosses the southern portion of the City from approximately South Lake Stevens Road in the east to Cavalero Road in the west. The 20th Street SE Corridor Subarea, shown in Figure 2-1, is comprised of approximately 845 acres of land located north and south of 20th Street SE, and east and west of SR-9. The subarea was annexed into the City on December 31, 2009.

2.2 Background & Planning Context

Growth Management Act

The Growth Management Act (GMA, Chapter 36.70A RCW) establishes a framework that the state's largest cities and counties must use to plan for growth in a manner that is coordinated with infrastructure needs and protects environmental resources. Each city subject to the GMA must plan to accommodate the population and employment projected to occur over a 20-year period. Local Comprehensive Plans must contain specific "elements" that, among other things, designate land uses, guide where and how growth will occur, identify necessary facilities and services, and plan for efficient multimodal transportation systems. In general, development projects must provide facilities and services "concurrent"

Figure 2-1. 20th Street SE Corridor Study Area



with development (defined as within 6 years). The GMA authorizes cities to prepare plans for smaller subareas (RCW 36.70A.080).

Lake Stevens Growth Strategy

The City's strategy for accommodating growth, as expressed in the Lake Stevens Comprehensive Plan (adopted 1994 and amended annually), is to direct the majority of residential and employment growth into highly concentrated "growth centers," where infrastructure and services are available. Centers were designated in 2006 and updated in 2010, and include the Central Business District, Frontier Village (currently called Lake Stevens Center), Hartford Industrial Center, and South Lake (currently called 20th Street SE Corridor). Objectives of the growth strategy include increasing employment and improving the City's jobs/housing balance, conserving environmental resources, and providing services and facilities efficiently. The Comprehensive Plan expresses the City's intent to prepare a subarea plan for each growth center.

Assessment Report

In 2010, the City had an *Economic Assessment* (Leland Consulting Group & LMN Architects, 2011a) prepared to evaluate the opportunities and constraints associated with each growth center. For the 20th Street SE Corridor, the assessment report identified the potential to add significant retail and office space over the next 20 years, and for the corridor to contain the City's highest concentration of jobs, which would help support its tax base.

Economic Development Strategy

Alongside the economic assessment, the City also had Leland Consulting Group & LMN Architects prepare an economic development strategy (*Retail Forecast and Leakage Analysis*, 2011b and *Fiscal Impacts of Economic Development, Lake Stevens Economic Development Strategy,* 2011c). The economic development strategy envisions the 20th Street SE Corridor containing the City's highest concentration of jobs, particularly professional services, engineering and high-value added small manufacturers in attractive, multi-story office buildings integrated with several retail nodes and mixed-use areas with higher-density housing. The strategy also identified that significant retail "leakage" was occurring (i.e., consumers were travelling outside the City to spend retail dollars), and that the City has an opportunity to attract new retail development based on its demographics, location, and quality of life in addition to attracting employers to this area. The vision for the 20th Street SE Corridor is to provide high quality office/employment uses, with multiple nodes of modern retail/mixed-use development and additional higher-density and multifamily residential units on the periphery or in mixed-use nodes. Potential target employment sectors include aerospace, clean technology, health sciences and outdoor sports/recreation gear.

The Leland Consulting Group report, *Fiscal Impacts of Economic Development: Lake Stevens Economic Development Strategy (2011c)*, also estimated the quantities of various land uses existing in the subarea and provided revenue forecasts for project buildout.

2.3 Proposal Objectives

The objectives for the 20th Street SE Corridor Subarea Plan are based on policies in the Lake Stevens Comprehensive Plan and the opportunities identified in the *Economic Assessment* and economic development strategy, discussed above. The objectives provide a basis for developing and evaluating subarea plan alternatives.

1. Establish 20th Street SE as an appealing gateway into the city with attributes reflecting a distinct, unified community.
2. Promote economic development and a more positive balance of jobs and housing by providing a mixture of jobs, goods and services, housing with recreation/open space and protection of important environmental resources.
3. Attract a variety of employers of varying sizes.
4. Encourage a concentration of local and regional retailing and services around the intersection of 20th Street SE and SR 9.
5. Create pockets of parks and open space throughout the corridor.
6. Continue the widening of 20th Street SE westward towards the Hewett Avenue (US-2) trestle.
7. Provide multiple routes of travel with clear circulation and access to destinations including parallel east-west circulation routes north and south of 20th Street SE.
8. Enhance the appearance of streets, sidewalks, sites, and buildings.

Draft subarea plan goals are summarized in Section 2.8.

2.4 Planned Action Designation

A Planned Action is a tool that cities can use to provide regulatory certainty and encourage economic development. This tool is permitted by state law (RCW 43.21C.031 and WAC 197-11-164), and operates by performing up-front SEPA review for a subarea plan and/or specific geographic area to streamline SEPA review for subsequent projects that are consistent with the plan. A Planned Action is designated by ordinance following preparation of an Environmental Impact Statement (EIS); the EIS evaluates the impacts of planned growth and identifies mitigation measures the City will require of the development. The Planned Action ordinance includes the following information:

- Designates the Planned Action area;
- Identifies the types of projects and amount of development that will be considered Planned Actions for purposes of SEPA compliance (certain types of development are not eligible, e.g., essential public facilities);
- Contains a finding that environmental impacts have been adequately addressed in the EIS;

- Identifies conditions or mitigation measures that will apply to projects; and
- Shows how the designated project meets the statutory definitions and criteria of a Planned Action.

When development is proposed in the planned action area, the City will evaluate the application to determine if it meets the criteria in the Planned Action Ordinance and "qualifies" as an implementing project. The criteria to determine consistency are:

- Is it the type of project anticipated in the subarea plan?
- Does it meet the conditions and mitigation requirements of the planned action?
- Have the significant environmental impacts been addressed in the EIS?

If a development proposal meets these criteria, then it qualifies as a planned action implementing project and no SEPA threshold determination is required; therefore, the project cannot be challenged on SEPA grounds. Developers may still propose projects that do not qualify as planned actions; however, they would perform their own SEPA analysis.

An updated draft Planned Action Ordinance is included in Appendix A of the Final EIS.

2.5 Environmental Review Process

SEPA/GMA Integration

State Rules for implementing the State Environmental Policy Act (SEPA), authorize cities to combine the requirements of the GMA and SEPA in their planning processes (WAC 197-11-210). The goal of this "integration" is to ensure that consideration of environmental issues is an integral part of local planning, that it occurs early in the process, and that informed public involvement occurs. The integration rules provide flexibility regarding the timing of SEPA review and the format of planning and SEPA documents.

The City has been developing a subarea plan and implementing regulations for the 20th Street SE Corridor concurrently with the Planned Action EIS. This approach generated environmental information early in the planning process, and has allowed decision makers to make planning decisions – including preliminary identification of a preferred alternative – using this information.

Prior Environmental Review

In 2006, the City prepared an integrated EIS for its 10-year Comprehensive Plan Update, which extended the planning horizon and population projections for the Comprehensive Plan. The EIS to the Comprehensive Plan identified the general (programmatic) impacts to the natural and built environment associated with the additional incremental growth. The EIS also identified a range of programmatic actions – including changes to policies and development regulations – that could mitigate potential impacts. The 2025 population and

employment targets evaluated in the EIS are still the basis for City planning and for *Alternative 1* of this EIS.

Scope of Review for Subarea Plan

The City initiated the SEPA process for the 20th Street SE Corridor Subarea Plan in June 2011, by issuing a determination of significance (DS), indicating that an environmental impact statement would be prepared, and requesting comments on the scope of the EIS. A public scoping meeting was held on July 14, 2011. The scoping comment period was open from June 28 to July 22, 2011. Based on its review of comments received and other available information, the City identified the following topics for discussion in the EIS as part of a combined scoping notice:

- **Natural Environment –**

  Earth – soils, geologically hazardous areas;

  Water – wetlands, streams and groundwater;

  Plants & Animals – wildlife, habitat and fisheries;

- **Air** – air quality and greenhouse gas emissions;
- **Land Use** – land use patterns, consistency with adopted plans & polices, population, housing and employment;
- **Aesthetics/Light & Glare** – changes to visual character and impacts to views;
- **Historic & Cultural Resources** – impacts to documented and potential cultural resources within the study area;
- **Transportation** – vehicular and pedestrian movement, traffic congestion, parking, and public transit;
- **Public Services** – police, fire, schools, parks and recreation; and
- **Utilities** – sewer, water, drainage and stormwater.

Other potential issues, such as noise and soil contamination, did not receive detailed study in the EIS based on review of existing environmental information and/or conclusions that the subarea plan was not likely to have a significant impact on those elements of the environment.

A Draft EIS was for the 20th Street SE Corridor Subarea Plan was published on January 24, 2012. The availability of the Draft EIS was duly noticed and advertised. The comment period on the Draft EIS extended to March 8, 2012. A public meeting on the Draft EIS and subarea plan alternatives was held on February 16, 2012, and provided an opportunity for public comment. Responses to comments received are included in Chapter 5 of the Final EIS.

Public Involvement and Preliminary Consideration of Alternatives

Public Meeting

- February 16, 2012 20th Street SE Corridor DEIS

City Council

- September 26, 2011 Subarea Plans/EIS Draft Alternatives
- February 13, 2012 20th Street SE Corridor DEIS
- April 23, 2012 Joint Meeting with PC to discuss Preferred Alternative
- May 7, 2012 Preferred Alternative
- May 14, 2012 Preferred Alternative

Planning Commission

- September 07, 2011 Subarea Plans
- October 05, 2011 Subarea Plans
- March 7, 2012 20th Street SE Corridor DEIS
- April 23, 2012 Joint Meeting with CC to discuss Preferred Alternative
- May 2, 2012 Preferred Alternative
- June 6, 2012 Development Regulations and Design Guidelines

The City Council identified Draft EIS *Alternative 2* as its "preferred alternative," for further review and discussion. No changes to the growth assumptions or land use pattern of *Alternative 2* as described in the Draft EIS were identified.

Zoning Code, Design Guidelines and Implementation Program

The Draft EIS generally describes the types of development regulations being considered to manage growth within the subarea. These include changes to the text of the existing land use code (Title 14 LSMC) and the addition of new subarea development regulations (Chapter 14.38 LSMC). The primary components include new zoning districts and revised development/use standards; changes to the zoning map, corresponding to the subarea land use map; design guidelines; a traffic impact fee program; and a planned action ordinance. Draft ordinances for these regulatory programs are being reviewed along with the proposed subarea plan. These regulations are described further in Sections 2.9 and 2.10 below.

2.6 Alternatives, Including the Preferred Alternative

Overview

The EIS considers three alternatives, which involve different amounts, types and intensities of growth within the subarea:

> ***Alternative 1,*** the *No Action Alternative,* is required by SEPA and assumes continued growth under existing zoning and current plans without the adoption of a subarea plan;
>
> ***Preferred Alternative/Alternative 2****,* places the greatest emphasis on encouraging and accommodating significant employment and commercial growth in the subarea that focuses growth in a number of nodes along the corridor, alongside some larger complexes, with an increase in higher-density residential uses in transitional areas. As noted previously, the Preferred Alternative is substantially the same as Alternative 2 evaluated in the Draft EIS; and
>
> ***Alternative 3****,* which is similar to *Alternative 2,* emphasizes moderate employment and commercial growth in identified commercial and mixed-use nodes and centers, but places a greater relative emphasis on residential growth, particularly higher-density residential growth compared to *Alternative 2*.

Table 2-1 provides an overview of the type and amount of new growth considered under the EIS alternatives.

Table 2-1. Summary of Growth Assumptions for Alternatives

Alternative	Retail (Gross Sq. Ft)	Office (Gross Sq. Ft)	Housing Units (dwelling units)
Alternative 1 – No Action	150,000-180,000	20,000-35,000	600-1,200
Alternative 2 – Employment/Commercial Emphasis	**400,000-450,000**	**1-1.25 million**	**900-1,000**
Alternative 3 – Moderate Employment/ Commercial with Residential Emphasis	300,000-350,000	600,000 - 750,000	1,200-1,400

The major elements of each alternative are described below. Graphics for the *Preferred Alternative/Alternative 2* and *Alternative 3* are generalized representations of the possible locations of various land uses and amounts of growth identified in Table 2-1. The Comprehensive Plan Land Use Map will be amended to integrate the subarea boundary and land use designations of the Preferred Alternative. An Official Zoning Map will be amended

to integrate the subarea boundary and zoning districts for the *Preferred Alternative/Alternative*.

Assumptions about future growth are based on a review of historical land use patterns, adopted forecasts, projects currently under review, and emerging economic development strategies. The *No Action Alternative* reflects a continuation of recent growth patterns. The low end of the range of dwelling units for the *No Action Alternative* (600) approximates a continuation of the subarea's current proportion of housing and population to citywide housing and population (9.2 percent), projected to 2025. The high end of the range (1,200) is an increase above the projection provided in the economic study, prepared for the City (Leland Consulting Group, 2011). A related study assumes a 1.63 percent increase in the subarea's population to 2025 (Leland Consulting Group & LMN Architects 2011a). Either population projection reflects a scenario in which the City would not adopt a subarea plan, would not modify zoning, and would not otherwise take action to change existing development trends. The *No Action Alternative* does not reflect the ultimate capacity of the subarea provided by all vacant and redevelopable land in the area and does not represent buildout. In 2025, the subarea would still contain substantial vacant and redevelopable land at the end of the planning horizon.

Overall, under the *No Action Alternative,* the 20th Street SE Corridor would retain much of its current character in terms of type and intensity of land uses. Site-by-site development would occur without the guidance of an overarching plan or vision. Commercial growth assumed in *the No Action Alternative* primarily reflects vested or planned development projects. Existing zoning, which segregates categories of uses (e.g., residential, commercial) would continue. A wide variety of commercial uses could occur on appropriately zoned properties (Local Business and Sub-Regional Commercial zones) alongside single-family residential uses in the remainder of the area.

In contrast, land uses for *the Preferred Alternative/Alternative 2* and *Alternative 3*, would be driven by market opportunities and an economic development strategy. Rather than following past trends, the action alternatives would establish a different image and land use pattern for the 20th Street SE Corridor, with a strong emphasis on employment growth, economic diversification and capturing the retail spending occurring outside the City. The types and amount of land uses embodied in the action alternatives are based on market opportunities identified in an economic assessment and economic development strategy prepared for the City (Leland Consulting Group, 2011 and Leland Consulting Group & LMN Architects 2011a). Identified development nodes would encourage a more intensive mix of uses – in the same building, on the same site, or within the same area – through new zoning classifications. These nodes would complement concentrated commercial and employment centers in the area and provide services to local neighborhoods and beyond. To ensure compatibility, permitted uses would be more limited than at present and more focused on market opportunities. To achieve the desired quality and character of the subarea, new development would be subject to design guidelines and standards. Designating the subarea as a Planned Action will provide an incentive to attract the desired type of growth.

The amount of growth occurring in the subarea under the *Preferred Alternative/Alternative 2* and *Alternative 3* primarily reflects an acceleration of historical growth trends; it is not based on a discrete forecast. It assumes that the subarea will attract a greater amount of citywide growth because of the previously mentioned factors.

Alternative 1 - No Action

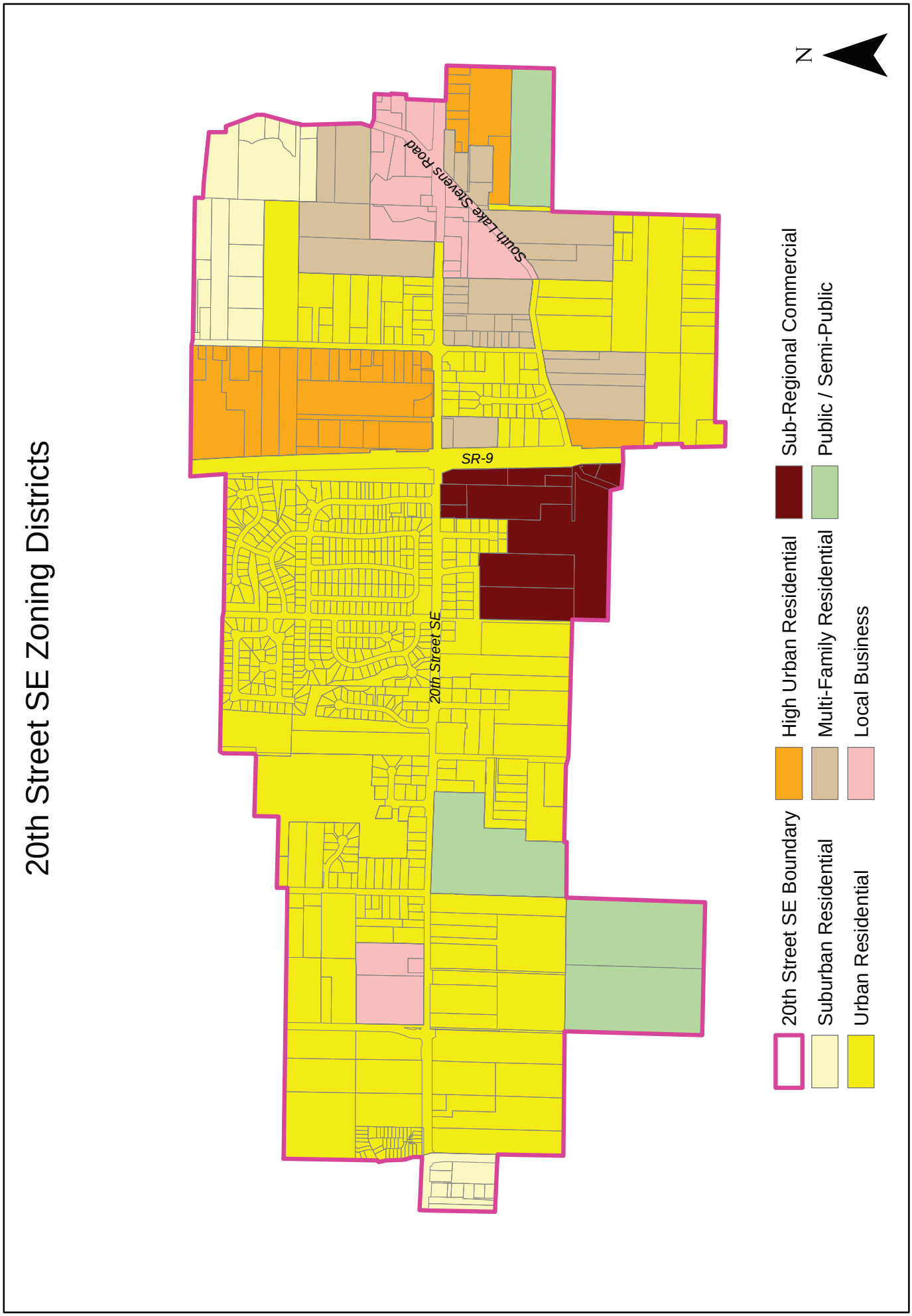
The *No Action Alternative*, a mandatory element in every EIS, is based on the current zoning designations in the subarea and assumes that the City will not adopt a subarea plan for the 20th Street SE Corridor. It does not mean that growth will not occur in the subarea. Existing zoning and land use designations, shown in Figure 2-2, will continue to apply; any changes would result from project-specific amendments. Under this alternative, the City would not target economic growth proactively in the subarea. Levels of growth, shown in Table 2-2, could range from a modest increase consistent with recent trends and forecasts (low end of range), to realizing a slightly greater proportion of citywide housing and population growth (high end of range). Land use would be predominantly single use in nature (i.e., no mixed-use development or employment/retail nodes). Housing would be predominantly single-family with some high-density and multifamily components. Commercial and retail development would occur in locations zoned for such uses (Local Business and Sub-Regional Commercial zones). Existing regulations allow a broad range of commercial uses with different bulk standards. For example, building heights currently range from 60-85 feet in commercial zones.

Table 2-2. No Action Alternative: 2025 Growth Assumptions

Land Use	Net Housing Increase	Net Population Increase	Net Commercial Increase (Gross Sq.Ft.)	Net Jobs Increase
Focus on Residential, limited Commercial	600-1,200	1,722-3,444	Retail: 150,000-180,000 Office: 20,000-35,000	360-465

No significant infrastructure improvements would occur in the subarea, beyond those identified in the existing Capital Facilities Plan. The *No Action Alternative* would not designate the subarea as a Planned Action; therefore, individual development projects would prepare their own SEPA documentation and would address development impacts and mitigation on a project-by-project basis. The *No Action Alternative* would not accomplish the City's stated objectives for the subarea.

Figure 2-2. No Action Alternative (Existing Zoning)



Preferred Alternative/Alternative 2 – Intensive Employment/Commercial Emphasis with some Residential Growth

The ***Preferred Alternative/Alternative 2*** is the most concentrated action alternative presented for the 20th Street SE Corridor. This alternative emphasizes significant retail/service and employment growth along with a moderate increase in higher-density residential development. The *Preferred Alternative/Alternative 2* promotes proactive employment and commercial growth that provides a balance of jobs and housing, directing significant growth to the 20th Street SE Corridor. The projected growth would occur through development of vacant, underdeveloped, or underused parcels throughout the corridor with concentrations at major intersections.

Figure 2-3 shows the subarea's proposed land use pattern. Table 2-3 shows the growth assumptions for the *Preferred Alternative/Alternative 2*. This alternative would locate a major portion of the City's 2025 employment growth target in the subarea, which could potentially exceed the current 2025 job projection citywide. In addition, a significant proportion (up to 14 percent) of citywide 2025 housing and population growth could occur in the subarea. (Forecasts are discussed in greater detail in Section 3.5 of the Draft EIS.) The *Preferred Alternative/Alternative 2* assumes housing growth will be 75 percent multifamily and 25 percent small lot single-family.

Table 2-3. Preferred Alternative/Alternative 2: 2025 Growth Assumptions

Land Use	Net Housing Increase	Net Population Increase	Net Commercial Increase (Gross Sq. Ft)	Net Jobs Increase
Mix of Retail, Office, and Residential	900-1,000	2,600-2,900	Retail: 400,000-450,000 Office: 1-1.25 million	3,800-4,500

The subarea would create a mixed-use urban center with areas of major employment, retail and residential. The subarea is planned as a commercial district allowing office, retail, and mixed-use areas with nodes of less intensive commercial development. . Thus, a major, regional commercial area at the southwest corner of 20th Street SE and SR-9 would be complemented by a Neighborhood Business retail node at 99th Avenue SE continuing on the south side of 20th Street SE to the existing commercial node centered at South Lake Stevens Road. Office development would occur in the identified office nodes east of SR-9 and south of 20th Street SE as well as north of 20th Street SE between 79th and 83rd Avenue SE. Mixed-use areas include east of Cavalero Road, north and south of 20th Street SE on the east side of SR-9 and west of the retail node at South Lake Stevens Road on the north side of 20th Street SE. Higher-density and small-lot single-family residential uses would be located in transitional areas throughout the subarea. It is likely that mixed-use areas will contain an option for multifamily units.

The major changes from the Alternative 2 concept map to the Preferred Alternative concept map include:

- Far western portion south of 20th Street SE changed from Urban Residential to Mixed Use Neighborhood.
- The area between 79th Avenue SE and 83rd Avenue SE located north of 20th Street SE was modified to split the High Density Residential and Mixed Use, Commercial & Employment north and south rather than east and west.
- Two nodes of Concentrated Employment were removed from east of SR-9.
- Four areas of Mixed Use, Commercial and Employment were changed to High Density Residential.

These changes are not significantly different from the Alternative 2 analyzed in the DEIS, but mainly change the acres within each land use designation.

The City, special purpose districts, and developers would provide new and upgraded utility infrastructure (sewer, water, and drainage/stormwater) to support planned growth. Road, circulation and transit improvements could include the following:

- Completing the expansion of 20th Street SE toward the Hewett Avenue trestle;
- Constructing a new two-lane east-west road extending 24th Street SE between SR-9, to the east, and Cavalero Road, to the west;
- Extending 91st Ave SE south to 24th Ave SE;
- Conversion of some private roads to public roads;
- Constructing multi-use trails on the northern side of the extended 24th Ave SE and under the powerlines;
- Widening and improving road shoulders to accommodate bicycles, where identified;
- Constructing a new transit center in the area to support employment and retail centers and nodes; and
- Establishing a finer-grained street grid as properties develop in the western portion of the study area, north and south of 20th Street SE.

This alternative would identify parks and recreation opportunities to support the goal of integrating the natural environment with the built environment. For example, the City would coordinate with Snohomish County to develop the existing County park site. In response to residential development, the City would plan and construct new parks and open spaces to meet adopted level of service standards with updates to the Parks and Recreation Plan. Revised development regulations may encourage new office, commercial and mixed-use development projects to provide public or semi-public open spaces.

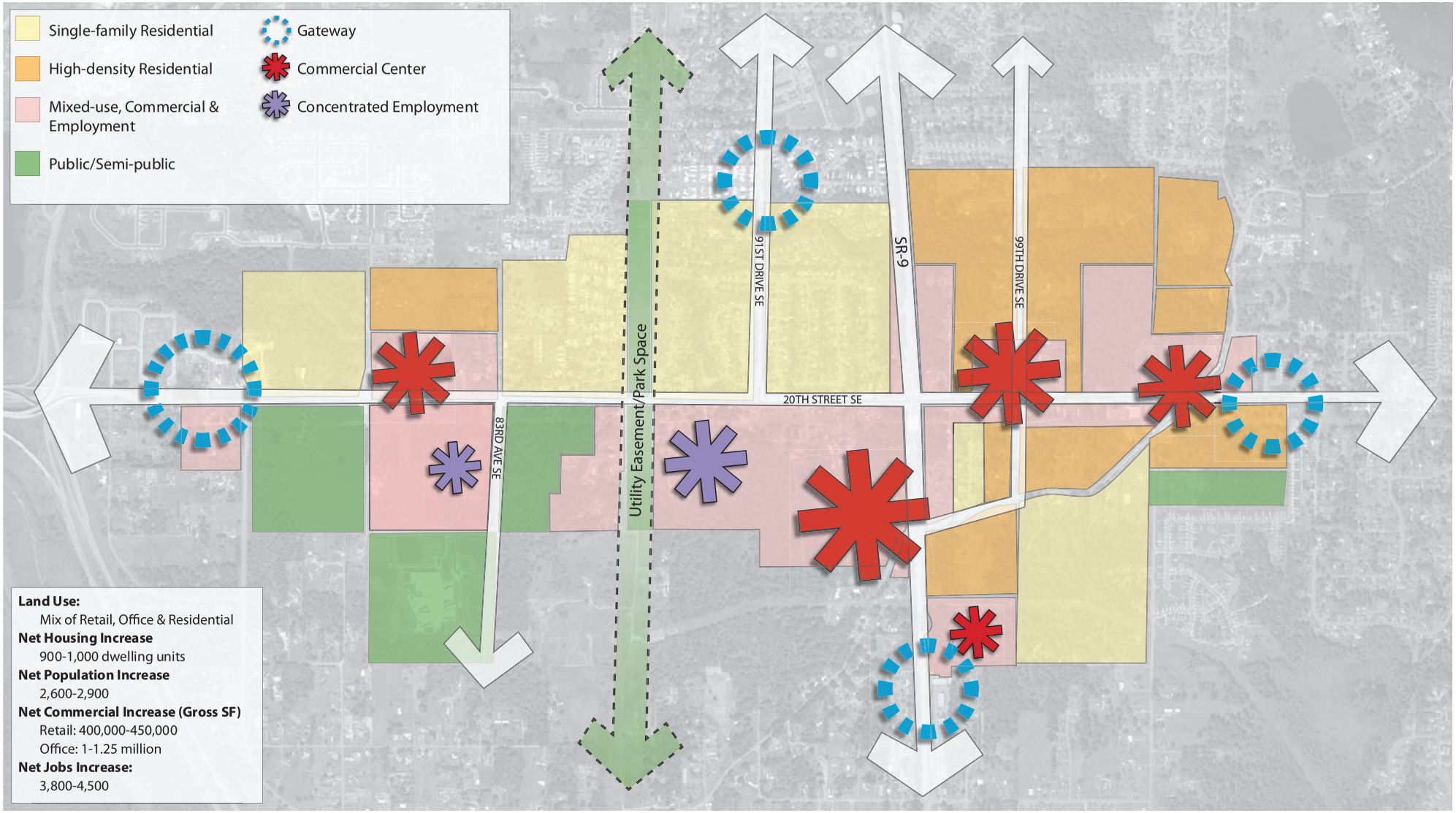


Figure 2-3. Preferred Alternative/Alternative 2 Land Use

20th Street SE Corridor Preferred Alternative: Intensive Employment with Residential

July 2012

CITY OF LAKE STEVENS

Weinman Consulting, LLC · Fehr & Peers · AHBL · LMN

New zoning districts, development standards and design guidelines would address the mix, scale, and form of development. A transportation impact fee program is proposed to address subarea transportation needs, along with other potential techniques to help finance improvements.

The 20th Street SE Corridor Subarea would be designated as a Planned Action, which would encourage economic development and facilitate SEPA review for projects that are consistent with the subarea plan and the EIS.

The *Preferred Alternative/Alternative 2* would accomplish the City's stated objectives for the subarea.

Alternative 3 – Moderate Employment/Commercial with Emphasis on Residential Growth

Alternative 3 includes a mix of retail, office, and residential growth in the amounts shown in Table 2-4. Proposed land uses are shown in Figure 2-4. While similar to the *Preferred Alternative/Alternative 2*, *Alternative 3* reduces the intensity of commercial and employment uses while proposing a greater amount of residential development throughout the area. In fact, this alternative envisions the greatest increase in residential development among all the alternatives. Like the *Preferred Alternative/Alternative 2*, the subarea would include a mixed-use district with individual commercial, office, and retail uses focused in nodes as identified in Figure 2-4.

Under this scenario, the subarea could accommodate between 20 percent and 30 percent of the City's targeted population increase by 2025. New jobs in the subarea would represent between 71 percent and 89 percent of citywide jobs by 2025. (Growth assumptions and forecasts are discussed in greater detail in Section 3.5 of the Draft EIS.)

Table 2-4. Alternative 3: 2025 Growth Assumptions

Land Use	Net Housing Increase	New Population Increase	Net Commercial Increase (Gross Sq.Ft.)	Net Jobs Increase
Mix of Retail, Office and Residential	1,200-1,400	3,500-4,000	Retail: 300,000-350,000 Office: 600,000-750,000	2,400-3,000

Similar to the *Preferred Alternative/Alternative 2*, new and upgraded utility infrastructure – sewer, water, and drainage/stormwater – would be provided to support planned growth. Also similar to the *Preferred Alternative/Alternative 2*, and described above, a program of road, circulation and transit improvements could be constructed.

Under *Alternative 3*, parks and recreation planning would be as discussed for the *Preferred Alternative/Alternative 2*. The City would coordinate with Snohomish County regarding development of the existing County park site. In response to residential development, the

City would plan and construct new parks and open spaces to meet adopted level of service standards with updates to the Parks and Recreation Plan. Zoning regulations would also encourage provision of public or semi-public spaces in new office, commercial and mixed-use development projects.

Alternative 3 would include new and amended zoning regulations and design guidelines to address the mix, scale and form of development. This would include new zoning classifications. A transportation impact fee program would be established to address subarea transportation needs, along with other techniques to help finance improvements.

The subarea would be designated as a Planned Action, which would encourage economic development and facilitate SEPA review for projects that are consistent with the subarea plan and the EIS.

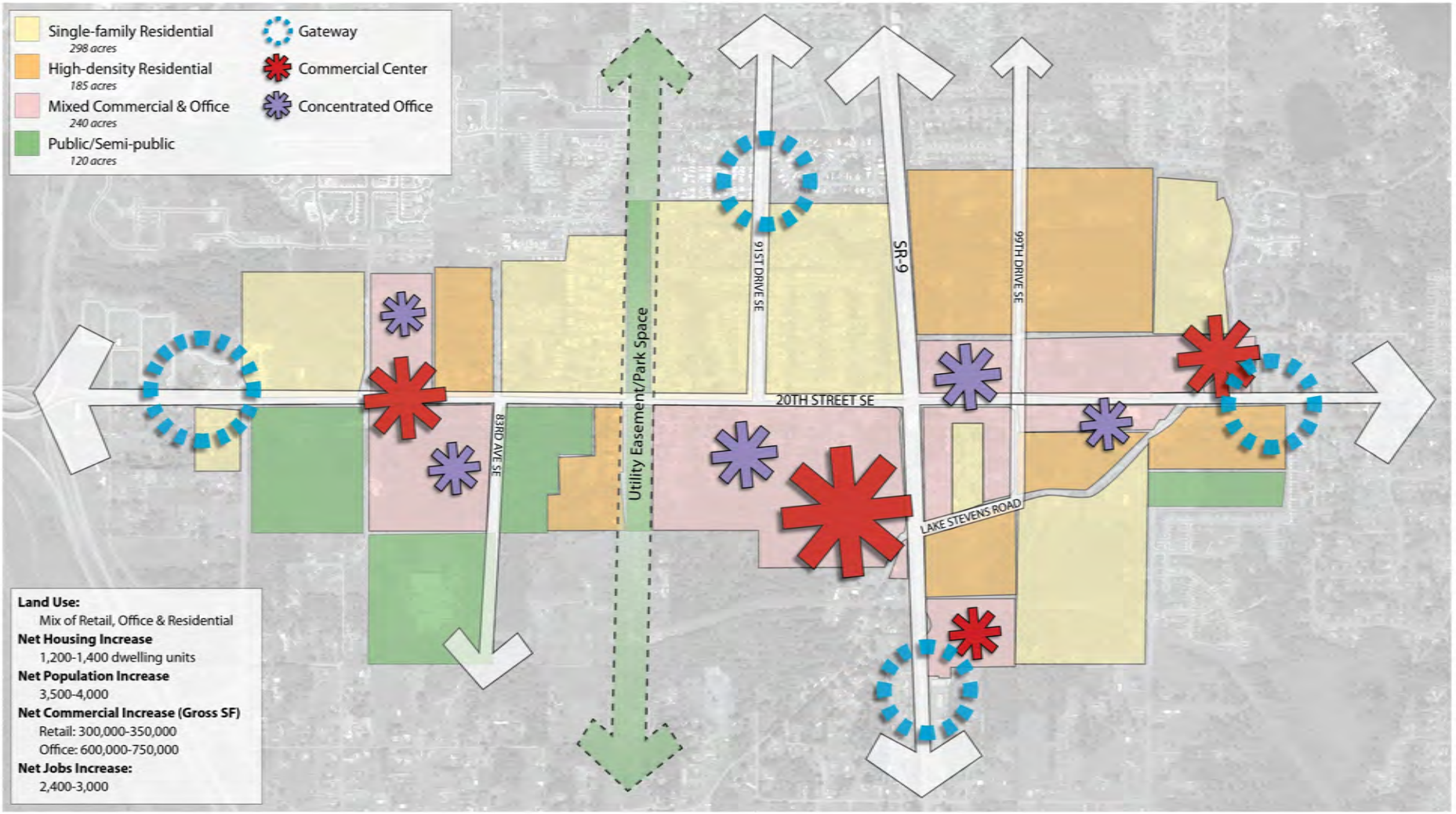
Alternative 3 would accomplish the City's stated objectives for the subarea.

Building Typologies

For purposes of illustration, and to assist in the EIS analysis, several typical building types that could occur in the subarea were developed and are shown in Figures 2-5, 2-6 and 2-7. Illustrative building types include office (office park, low-rise office and mixed-use), commercial/retail (neighborhood and regional scale centers), and higher-density residential (multifamily and small lot residential). The illustrations are intended to represent the potential types and scale of development that could occur under the *Preferred Alternative/Alternative 2* and *Alternative 3*, consistent with draft subarea plan policies, new zoning standards and new design guidelines, and the development assumptions in the EIS. The illustrations do not represent specific development proposals by property owners or the City.

2.7 Subarea Plan Goals

Under the *Preferred Alternative/Alternative 2*, a Subarea Plan would be adopted to guide the type, amount, location and character of future growth. Draft subarea plan goals are summarized briefly below. The subarea plan has been developed in coordination with the EIS and reflects environmental information contained in the EIS, public comment and legislative direction established by the City Council with the assistance of the Planning Commission.



2oth Street Corridor Alternative 3: Enhanced Employment/Increased Residential

September 22, 2011

Figure 2-4. Alternative 3 Land Use

The proposed subarea plan establishes a framework for implementing a vision for the 20th Street SE Corridor. It relies on and supplements general policies and regulations found in the Lake Stevens Comprehensive Plan, municipal code, and *Engineering Design and Development Standards* with clear policy statements and guidance regarding the type, amount, location, and character of future growth in the 20th Street SE Corridor. Draft development regulations are based on the guidance in the subarea plan and impacts identified in the Draft EIS.

The major objectives of the subarea plan are to promote the addition of significant retail and office space in the subarea over the planning horizon in multiple retail/mixed-use nodes, to create a concentrated job center, and to provide opportunities for quality higher-density residential neighborhoods in transitional areas. Secondary objectives include attracting a variety of different sized employers; establishing a program of road, circulation and transit improvements; and emphasizing high quality design standards. Major plan elements and goals in the subarea plan include the following:

1. **Community Character**
   Goal 1: D*ramatically modify the appearance, function, identity and economic value of the area by creating a cohesive district.*

2. **Livable Places & Housing**
   Goal 2: Create a collection of neighborhoods offering a range of choices in housing type and size, tenured retail goods and services, and employment with high quality design.

3. **Land Use & Intensity**
   Goal 3: Identify business/office park locations, and areas of commercial/mixed use nodes and specific locations for higher density housing to create a vibrant district for economic development, jobs, regional shopping and housing options over a 10 to 20 year period with some areas developing earlier and others later depending upon access, market demand, environmental factors and other variables.

4. **Circulation & Mobility**
   Goal 4a: Develop a complete and efficient transportation system that supports all modes of travel based on an attainable Level of Service.

   Goal 4b: Acknowledge that designing a road network to accommodate the peak one hour of vehicle travel per day may not be economically feasible and has negative consequences for other modes of travel and the environment.

5. **Sustainability & Natural Resources**
   Goal 1.5: Development and infill projects should apply best management practices and integrate site design into the natural systems and greenbelts while striving to retain

natural elements such as existing vegetation and significant trees and take advantage of mountain and valley views.

6. **Public Places & Community Facilities**
   Goal 1.6: Invest in and/or plan for public and semi-public gathering places and community facilities to attract high-quality residential and employment development throughout the subarea.

In addition, the subarea plan identifies development typologies, shown in Figures 2-5, 2-6 and 2-7, which portray the main development types anticipated, both visually and descriptively, as they relate to various locations envisioned in the plan. The main typologies include Office/Business, Commercial and Higher Density Residential (multifamily and small lot single-family).

A Subarea Land Use Map is shown in Figure 2-8.

2.8 Subarea Design Guidelines

The zoning code currently requires design review in most zoning districts for which design guidelines have been adopted. Design review is generally conducted by the City's Design Review Board, except for smaller projects (less than $100,000 in value) where review is administrative.

The 20th Street SE Corridor Subarea Plan contains design guidelines which are intended to ensure that site and building development achieve the character and quality of design envisioned by the Plan. The guidelines address the following topics:

Explanation of Design Guidelines: Discussion related to the implementation and application of design guidelines to project development.

Site Orientation and Design: Pedestrian Orientation and Streetscape; Architectural Landmarks and Gateways; Plazas, Courtyards and Seating Areas; Lighting; Curb Cuts and Crosswalks; Pedestrian Connections; Parking Lots; Screening of Trash and Service Areas.

Building Design: Primary Orientation; Ground Level Details; Massing and Articulation; Architectural Character; Signs.

Multifamily Neighborhood Design: Site Design; Building Design; Parking and Access.

Glossary & Definitions: Common architectural terms used in the design guidelines.

Office

Employment opportunities within the City of Lake Stevens are supported by a combination low and medium intensity office uses. The majority of these uses are planned for the 20th Street SE Corridor Subarea. These uses are expected to serve both local and regional employers. The proposed office related zones, in both subareas, are intended to prevent the appearance of strip commercial development by allowing office uses but limiting the amount of commercial uses. However, the 20th Street SE Office Typology Development is expected to be somewhat auto-accommodating.

a. Office Park

The location of an Office Park is the product of lot size and access. Typically a collection of 2-4 story buildings, Office Parks are often times sited in a natural, "campus-like" environment where landscaping serves to soften the scale of the buildings and adjacent parking areas. A number of smaller parking lots with greenbelts, landscaping or open areas is preferable to one large parking area.

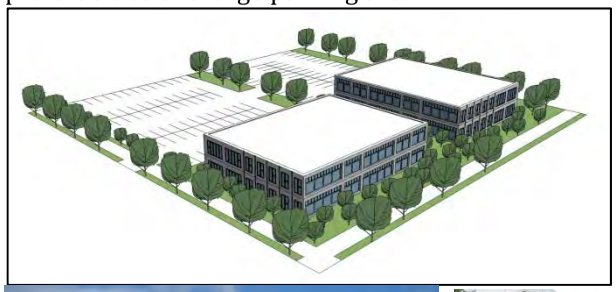


Illustration of office park development

Examples of office park development

b. Low Rise Office

Low-rise development is intended to be of a scale and character similar to nearby residential developments as a means of promoting compatibility with the surrounding area. The allowed uses are intended to primarily serve nearby neighborhoods and have few detrimental impacts on the neighborhood. Where feasible, development should be oriented to local pedestrians and bicyclists.

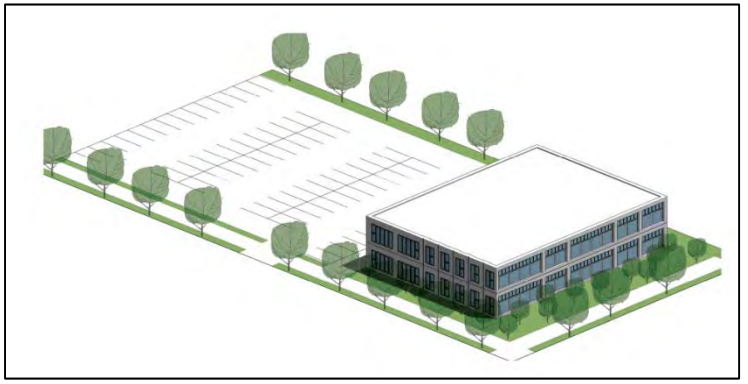


Illustration of low-rise office development

Examples of low-rise office development

Figure 2-5. Prototype Illustrations - Office

c. Mid Rise Office

The location of Mid-rise Office is the product of lot size and access. Typically 2-4 stories, Mid-rise Office is often times sited in a "park-like" environment where landscaping serves to soften the scale of the building and adjacent parking areas.

Illustration of mid rise office development

Example of mid rise office development

d. Mixed Use Office

Unlike the low office which is designated to be compatible with surrounding residential neighborhoods and solely consist of surface parking, mixed-use examples of office include shared parking with the other commercial and/or residential use and some tuck-under structured parking, which can be accommodated onsite or integrated vertically into the office building.

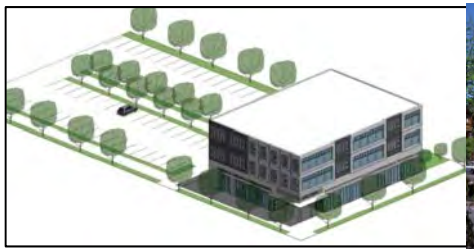


Illustration of mixed use office development

Example of mixed use office development

Figure 2-5. Prototype Illustrations - Office

Commercial

Commercial uses in the 20th Street SE Subarea are envisioned to include both neighborhood-oriented retail uses that serve the surrounding residential neighborhoods and larger format retail chains serving a region. The 20th Street SE Subarea will be developed with recognition and respect for natural areas, where feasible, including views of designated woodlands and habitat corridors. Development is also intended to be pedestrian-oriented with limited parking allowed between the building and the street, lush landscaping that helps screen the building and clearly defines the pedestrian realm. Landscaping associated with stormwater management practices shall be incorporated into all parking areas.

Neighborhood Retail Centers

The neighborhood centers could occur at intersections throughout the Subarea and could be zoned for mixed-use development. The existing center in the northeast corner of 20th Street SE and South Lake Stevens Road is an example of a smaller retail center serving a neighborhood as well as including the administrative offices for Lake Stevens Fire.

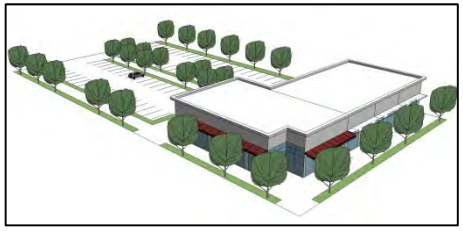


Illustration of neighborhood retail center
Example of neighborhood retail center

Regional Retail Centers

The larger retail centers correspond to the availability of larger sites within the 20th Street SE Subarea. One location is the area in the southwest corner of SR9 and 20th Street SE. These centers could include big box retail with smaller retail, restaurants, and entertainment.

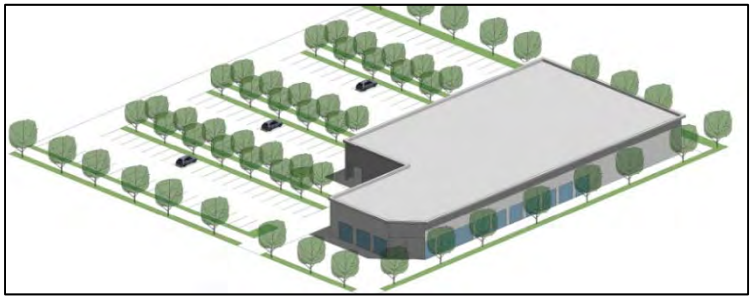


Illustration of regional retail center

Illustration of regional retail center

Figure 2-6. Prototype Illustrations - Commercial/Retail

Higher Density Residential

Higher density residential development in the subarea would support the new jobs and commercial centers. The use can also serve as a transition zone between higher intensity uses such as office parks and regional commercial centers and existing single-family housing developments. There are two types of higher density residential: multi-family residential and small lot single-family residential.

a. Multi Family Residential

Multi-family residential development includes condominiums, apartments, townhouses, and row houses. Complexes proposed in the 20th Street SE Subarea are expected to be 2-4 stories with a common street frontage and parking behind or to the side of the buildings. Based upon the size of the development, buildings are to include a common or shared open space that encourages neighbors to gather and children play.

Besides creating a consistent and unified edge condition, the street facing façade should consist of a range of plantings, including grass that softens the appearance of the building. Where feasible, the primary street facing façade is oriented to a public amenity such as a park, retail or a community service use or a civic use such as a local library or a post office. Safety, in the shared open space and along the street, is promoted by a site and building layout that encourages "eyes on the street."

Illustration of a multi family housing

Examples of multi family housing

b. Small Lot Single Family Residential

Small lot single-family residential includes single-family homes on small or shared lots, duplexes, cottage housing, etc. These serve to increase housing density near employment and retail locations, while serving as a transition between the higher density use and existing single-family developments. Due to the closeness of the houses, shared open areas such as community gardens, lawn areas or seating areas are important amenities. Non-motorized connections to nearby parks or trails, retail centers or other facilities are important.

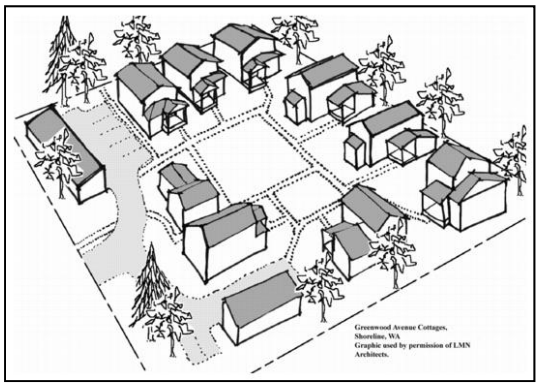
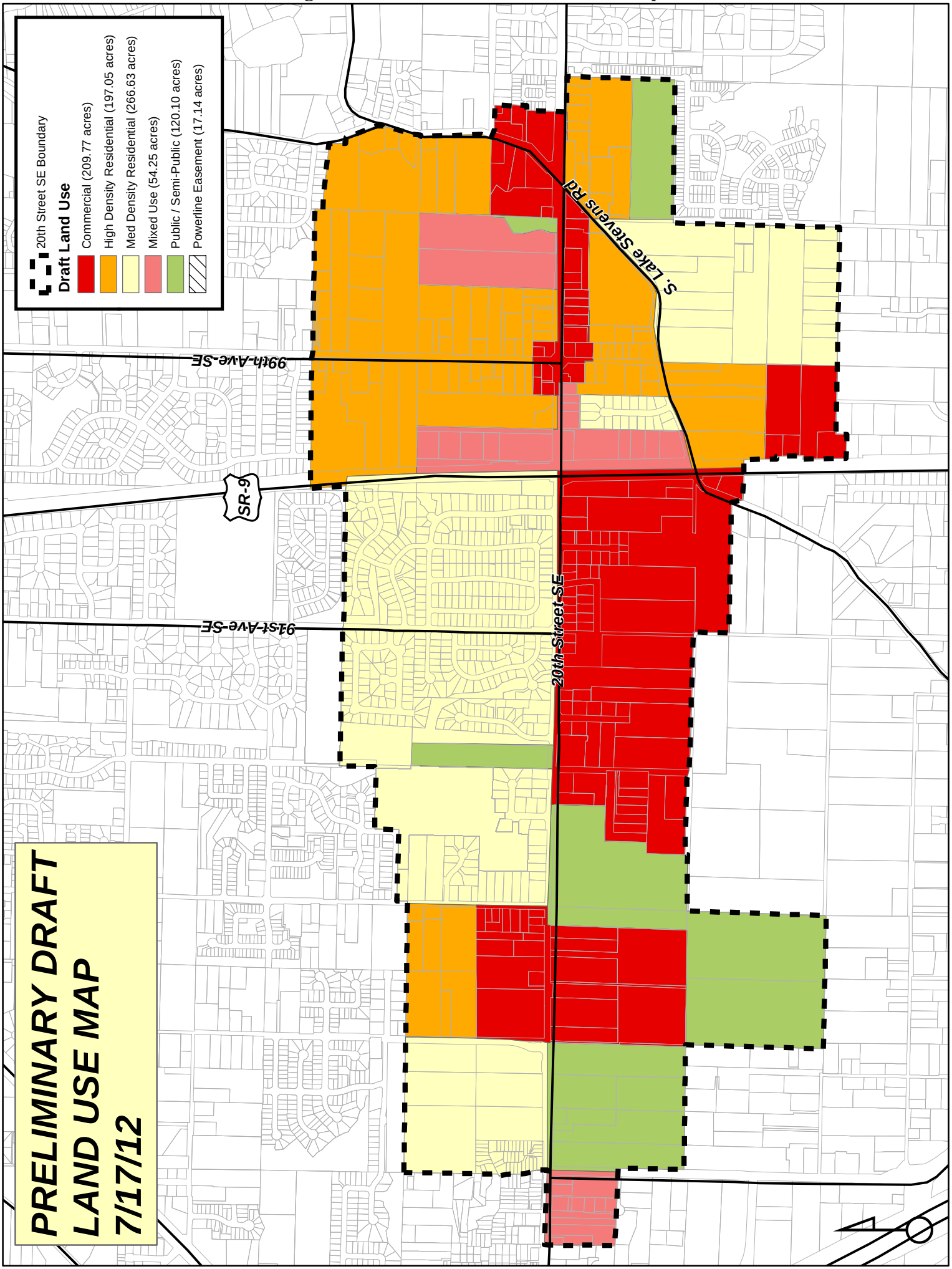


Illustration of a cottage housing development

Illustration of a cottage housing development

Figure 2-7. Prototype Illustrations - Higher Density Residential

Figure 2-8. Draft Subarea Plan Land Use Map



The 20th Street SE Corridor Draft EIS previously disclosed that design guidelines would be adopted as part of the subarea implementation program, and that they would help mitigate some possible impacts (e.g., land use, aesthetics). The guidelines are, in effect, mitigation measures and would have no significant impacts in themselves.

2.9 Subarea Development Regulations

The City is proposing new development regulations for the subarea and a revised Official Zoning Map to help implement the 20th Street SE Corridor Subarea Plan. Changes to the text of the new code chapter (Chapter 14.38 LSMC) will establish new zoning district classifications and development standards that are applicable to the subarea.

Four new zoning districts are proposed in the subarea, with a focus on varying land uses:

> **Business District (BD)** – intended to promote community and regional employment, and including a broad range of office uses, professional, scientific and technical services, light manufacturing, and some warehousing and distribution, and wholesale and retail trade.
>
> **Commercial District (CD)** – intended to accommodate high-intensity retail needs for the local and regional market. Major categories of uses include retail, entertainment, lodging, a broad range of services (personal, professional, health care, etc.), combined with residential uses in mixed-use buildings.
>
> **Mixed-Use Neighborhood (MUN)** – intended to accommodate higher-density residential development near employment uses.
>
> **Neighborhood Business (NB)** – intended to accommodate convenience goods, services and smaller-scale shopping centers near neighborhoods to serve pedestrians and commuters.

Several existing zoning designations – Urban Residential (UR), High Urban Residential (HUR), and Public/Semi-Public (P/SP) – would continue to apply as well.

The location of proposed zoning districts is shown on Figure 2-9. In general, the new zoning districts would diversify and intensify the land uses that are permitted in the subarea, consistent with the objectives of the subarea plan and the subarea land use map.

Development standards for each zoning district establish setbacks, landscape area and maximum height. Heights in commercial zones range from 35 feet in NB, 50 feet in BD, and 55 feet in CD. In mixed-use zone, the maximum height is 45 feet in MUN. Maximum heights

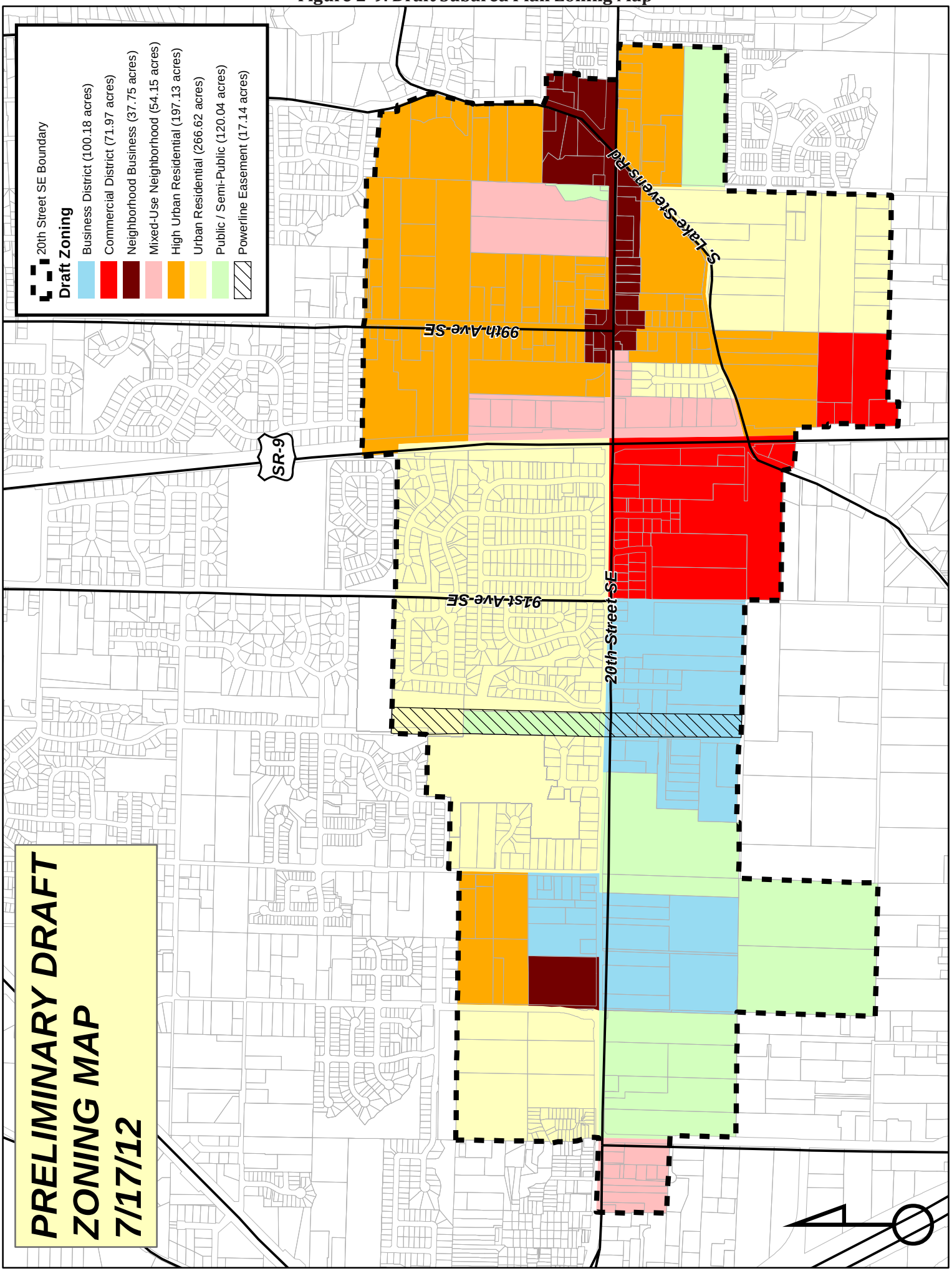
in existing residential zones are 35 feet in UR and 45 feet in HUR. These heights are consistent with those considered in the Draft EIS.

The intensity of development would be controlled by floor area ratio (FAR), which is a ratio of building floor area to lot area, and is expressed as a fraction (e.g., 0.3). A "basic" FAR is established for each zoning district. Base FAR can be exceeded, up to a maximum established for each zoning district, if an applicant incorporates certain "bonus features" in a development proposal. Bonuses are provided as a means to achieve a variety of desirable features: public plazas, public art, public uses, public restrooms, structured parking, sustainable development (i.e., LEED certification, Low Impact Development techniques, and alternative transportation modes), affordable housing (a minimum of 15 percent of units), and contribution of funds to acquire off-site public space. Use of FAR to control development intensity and use bonus incentives were options that were discussed in the Draft EIS. Proposed development regulations also contain standards for parking, landscaping, lighting and signs.

As recommended in the Draft EIS, the City is also proposing to adopt a Traffic Impact Fee program. This city-wide regulatory program would help to regulate development, mitigate impacts, and finance necessary road improvements in the 20th Street SE Corridor Subarea. Each development proposal would be assessed a fee, adopted in the City's fee schedule, that is based on a development's size, traffic generation and proportional impact to the local road system. Fees would be specific to each traffic impact zone designated by the program.

Proposed development regulations, the Planned Action Ordinance and the Traffic Impact Fee program would mitigate impacts identified in the Draft EIS. These programs are mitigation measures and would not themselves generate impacts that are different in type or degree from impacts discussed in the Draft EIS.

Figure 2-9. Draft Subarea Plan Zoning Map



2.10 Benefits & Disadvantages of Delaying the Proposed Action

The City is preparing for the next wave of growth, and subarea planning is an element of a conscious strategy to grow and diversify the local economy. Benefits of the proposed subarea plan include attracting additional retail and services, expanding housing, increasing employment opportunities, and concentrating growth in a mixed-use center. From an economic development perspective, the proposal seeks to attract a greater amount of regional employment and commercial opportunities to the City, and it will use the subarea plan and planned action to create an attractive environment and incentives for development.

Delaying the proposed subarea plan would be equivalent to implementing the *No Action* alternative, and would result in these benefits being postponed or potentially lost. Growth in the City would also be relatively more dispersed and less concentrated in centers. At the same time, lower levels of growth would create lower demand for public services and capital facilities.

2.11 Issues to be Resolved

The City must determine the appropriate types, intensity and overall magnitude of development for the subarea. Furthermore, the City will need to examine how these elements could change the existing character of the area. In addition, increased growth will affect the cost, timing and ability to fund necessary public services and capital improvements.

3. ERRATA

A number of typographical errors and omissions were identified in various sections of Chapter 3 of the Draft EIS. These minor errors and appropriate corrections are identified below and are incorporated into the text of the EIS. The errors and corrections do not affect the substance of the analysis or conclusions contained in the Draft EIS.

Chapter 1. Summary

Table 1-2. Summary of Impacts

Transportation, Alternative 3 (3rd column), Page 1-10.
Two intersections were listed incorrectly under the "AM peak hour level of service" heading: 20th Street SE/SR-9 (LOS F), and 20th Street SE/South Lake Stevens Road (LOS D). These intersections should be deleted from the AM peak hour level of service heading and listed instead under the "PM peak hour level of service" heading. The correction has been incorporated into the Summary section of the Final EIS. The analysis contained in the Transportation section (3.8) of the Draft EIS shows these intersections correctly and no further changes to the text of the EIS are necessary.

Police Service, All alternatives, Page 1-11
The demand for additional police officers, based on subarea population, was listed incorrectly in the Draft EIS. Demand calculations have been corrected for all alternatives in the table.

Section 1.5 Significant Unavoidable Adverse Impacts

Section 1.5.1 Natural Environment, Page 1-25.
In the second sentence, change "runoff that must *by* retained…" to "runoff that must be retained..."

Chapter 2. Project Description

Table 2-2, Alternative 1 Office Space, Page 2-9.
Alternative 1 Office space should read "20,000-35,000" gross square feet, not 20,000-30,000" gross square feet. A corrected table is included in Chapter 2 of the Final EIS.

Graphic for Alternative 2

Figure 2-3 (Alternative 2) on page 2-13 of the Draft EIS reflects an earlier version of the EIS alternative. Corrected Figure 2-3 is included in Section 2 of the Final EIS. The revised figure also corrects a mapping error that omitted several parcels of land, comprising less than 5 acres, in the western portion of the subarea. These parcels were included in acreage calculations and environmental analyses contained in the Draft EIS.

Chapter 3. Environmental Analysis.

Section 3.3, Land Use.

Land Use Figure 3.3-5, Page 3-45.

The same incorrect graphic noted above in Chapter 2 (Figure 2-3) was also repeated as Figure 3.3-5 in the Land Use Section of the Draft EIS, and is similarly replaced by the corrected figure in Chapter 2 of the Final EIS.

Section 3.8 Transportation.

Table 3.8-3, Alternative 1 Office Space, Page 3-115

The amount of office space included in Alternative 1 should read "20,000-35,000" gross square feet. This correction has also been made to Table 2-2 in Chapter 2 of the Final EIS.

Transit Routes and Facilities, Figure 3.8-4, Page 3-104.

The figure is updated to reflect current Community Transit bus routes in the 20th Street SE Corridor Subarea. A revised Figure 3.8-4 is included on the following page.

Section 3.9 Public Services

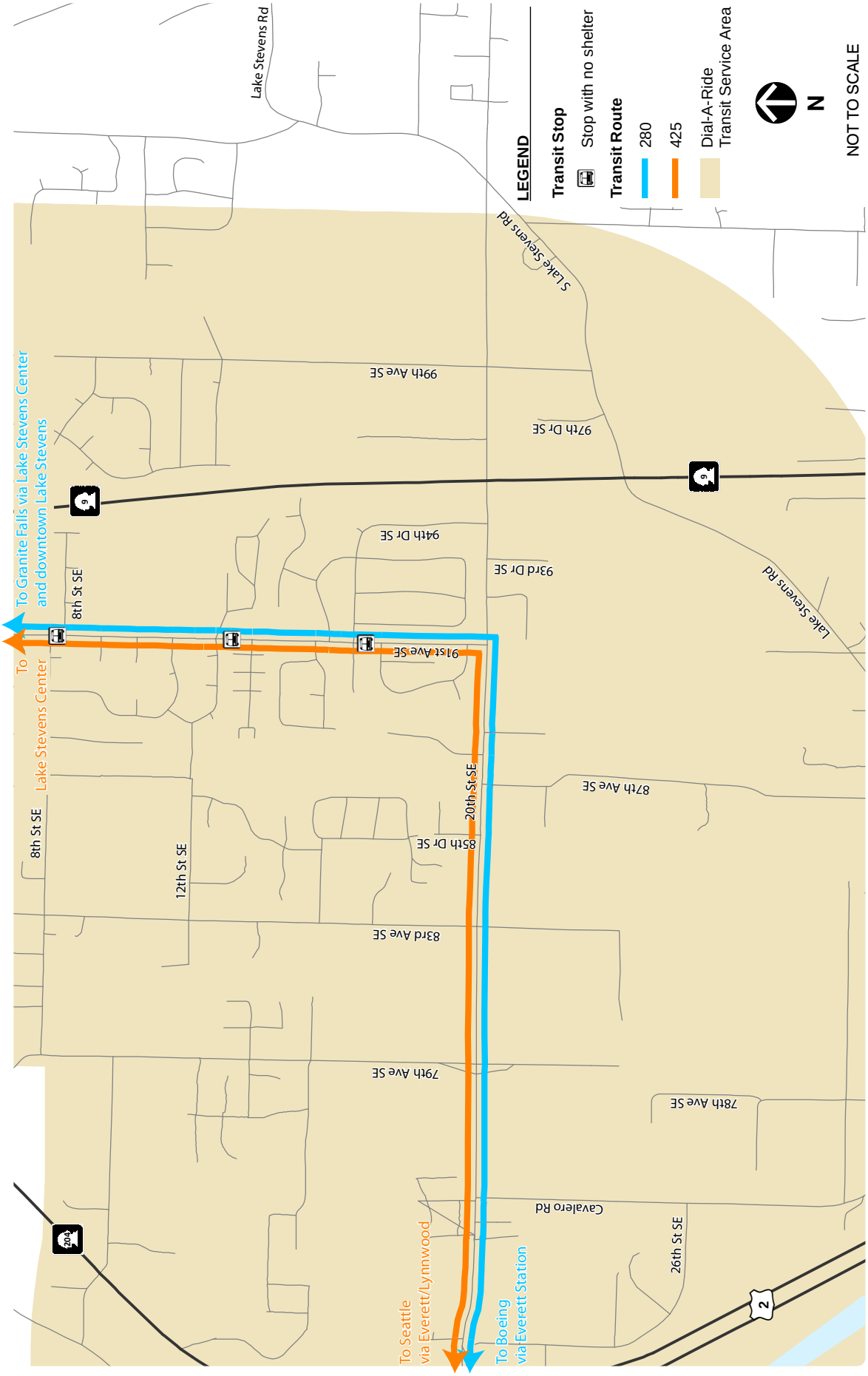
Police Service

An error was identified in Draft EIS **Table 3.9-7 Cumulative Demand for Police Services** on Page 3-147. This table is incorrect; it should be deleted and replaced by the corrected **Table 3.9-7** below. Column 2 shows the additional demand for the 20th Street SE Corridor Subarea EIS alternatives. Column 3 shows cumulative demand for police services for both the 20th Street SE Corridor Subarea and the Lake Stevens Center Subarea. The cumulative estimate is based on the City's adopted level of service and the population associated with the combined subarea alternatives. The "low" and "high" estimates reflect the population range identified for the subarea alternatives. The correction does not change the EIS analysis or conclusions regarding service demand.

Table 3.9-7 Cumulative Demand for Police Services

Alternative	20th Street SE Corridor Additional Officers Per Standard		Total Cumulative Subarea Demand
	Low	High	
Alternative 1	2.3	4.6	2.69-5.07
Preferred Alternative/ Alternative 2	3.5	3.9	4.19-4.67
Alternative 3	4.7	5.3	6.6-7.6

Figure 3.8-4. Transit Routes and Facilities



Source: Community Transit, 2011

4. NEW INFORMATION & SUPPLEMENTAL ANALYSIS

At the time the Draft EIS for the 20th Street SE Corridor Subarea Plan was prepared, the City had not identified a preferred alternative. As described in Section 2.5 of the EIS, the City has been using an integrated planning and SEPA process – including environmental analysis and public input – to help identify a preferred alternative. As a result, the Draft EIS could not reasonably identify the extent or design of transportation improvements that would be needed to support a preferred subarea plan. The Air Quality discussion in the Draft EIS (Section 3.2.1) noted that plans were not available for future transportation improvements, and a preferred alternative had not been identified. Therefore, a transportation air quality conformity analysis, as required by state and federal law, could not be performed at that time. Air quality conformity analysis is intended to ensure that plans and projects affecting air quality will enhance or maintain federal (and state) health-based air quality standards. That analysis, therefore, was deferred to the Final EIS.

The following discussion of air quality contains the required transportation conformity analysis. It is based on the City's preliminary identification of *Alternative 2* as the *Preferred Alternative* for the 20th Street SE Corridor Subarea, and a conceptual design for a roundabout on SR-9 at South Lake Stevens Road and a new 24th Street SE. The analysis concludes that the new intersection/roundabout would satisfy project-level conformity requirements. A transportation memorandum, which documents the assumptions and travel demand forecasts that were input to the air quality modeling, is contained in Appendix B.

To simplify review of this new information by interested parties, the following section incorporates the air quality section from the Draft EIS, with appropriate modifications and additions related to transportation conformity. Note that Table 3.1-2 has also been revised. The discussion of Transportation Conformity occurs at the end of the section, on pages 4-9 and 4-10. This updated analysis replaces Section 3.2.1 in the Draft EIS.

3.2.1 Air Quality

Affected Environment

Three agencies have jurisdiction over the ambient air quality in Lake Stevens: the U.S. Environmental Protection Agency (EPA), the Washington State Department of Ecology (Ecology), and the Puget Sound Clean Air Agency (PSCAA). These agencies establish regulations that govern concentrations of pollutants in the outdoor air and rates of contaminant emissions from some air pollution sources. The air quality analysis focused on the implications of project-related traffic based on estimated concentrations of carbon monoxide. The analysis was conducted in accord with EPA guidelines and in a manner consistent with state and federal air quality rules.

Typical air pollution sources in the project area include vehicular traffic, existing retail and commercial uses, and residential wood-burning devices. While many types of air pollutant sources are present, the overall largest pollutant emission sources are vehicles and residential wood burning. For analyses that consider proposed transportation sources, the air pollutant used as the primary indicator of potential impacts is carbon monoxide (CO) because this is the vehicular pollutant emitted in the largest quantities for which there are health-based ambient air quality standards. Vehicle exhaust and tire action on paved and unpaved surfaces also generate fine particles (also called PM10 and PM2.5 based on their size), but emission rates from such sources are typically small compared with fine particle emitting combustion sources like wood-burning stoves. Motor vehicles also emit sulfur oxides and nitrogen dioxide, but ambient concentrations of these pollutants are not usually high except near large industrial facilities.

Existing Air Quality

To measure air pollutant concentrations and classify air quality conditions, Ecology and PSCAA maintain a network of monitoring stations throughout the Puget Sound region. Based on monitoring information collected over a period of years, the state (Ecology) and federal (EPA) agencies classify regions as "attainment" (i.e., complying with) or "nonattainment" areas for specific air pollutants. Attainment status is therefore a measure of whether air quality in an area complies with the National Ambient Air Quality Standards (NAAQSs) which are intended to protect human health and welfare. Applicable air quality standards for selected air pollutants are shown in Table 3.2-1. Regions that were once designated nonattainment but that have since attained compliance with a standard are considered "maintenance" areas. The project area is within a CO maintenance area.

Another area of concern related to air pollution is the potential for emissions of some substances to affect climate. Global climate change and greenhouse gas emissions (including carbon dioxide, CO_2) from transportation are currently unregulated federally, but some state and local jurisdictions have developed recommended approaches for project-level disclosure of greenhouse gas emissions. These are discussed on Section 3.2.2 of the Draft EIS.

Ozone

Ozone is a highly reactive form of oxygen not emitted directly by emission sources but created by sunlight-activated chemical transformations of nitrogen oxides and volatile organic compounds (hydrocarbons) in the atmosphere. Ozone problems tend to be regional in nature because the atmospheric chemical reactions that produce ozone occur over a period of time, and because during the delay between emission and ozone formation, ozone precursors can be transported far from their sources. Transportation is a major source of ozone precursors.

Table 3.2-1. Applicable Ambient Air Quality Standards for Criteria Pollutant

Pollutant	Terms of Compliance [a]	Concentration
Total Suspended Particulate (TSP) Annual Average ($\mu g/m^3$) 24-Hour Average ($\mu g/m^3$) WA State only; no federal standard	Geometric mean not to exceed; Not to be exceeded more than once per year.	60 $\mu g/m^3$ 150 $\mu g/m^3$
Inhalable Particulate Matter (PM10) 24-Hour Average ($\mu g/m^3$)	The 3-year average of the 99th percentile of the daily concentrations must not exceed.	150 $\mu g/m^3$
Fine Particulate Matter (PM2.5) Annual Average ($\mu g/m^3$) 24-Hour Average ($\mu g/m^3$)	The 3-year annual average of daily concentrations must not exceed; The 3-year average of the 98th percentile of daily concentrations must not exceed.	15 $\mu g/m^3$ 35 $\mu g/m^3$
Carbon Monoxide (CO) 8-Hour Average (ppm) 1-Hour Average (ppm)	The 8-hour average must not exceed more than once per year; The 1-hour average must not exceed more than once per year.	9 ppm 35 ppm
Ozone (O_3) 8-Hour Average (ppm)	The 3-year average of the 4th highest daily maximum 8-hour average must not exceed.	0.075 ppm

Note: $\mu g/m^3$ = micrograms per cubic meter; ppm = parts per million

[a] All limits are federal *and* state air quality standards except as noted. All indicated limits represent "primary" air quality standards intended to protect human health.

Source: ENVIRON International Corporation

In the past, due to violations of the federal ozone standard, the Puget Sound region was designated nonattainment for ozone based on the 1-hour standard in effect at that time. In 1997, the EPA determined that the Puget Sound region had attained the public health-based NAAQS for ozone and redesignated the region as attainment for ozone. In 2005 EPA revoked the 1-hour ozone standard in most areas of the US including the Puget Sound region. This action ended the ozone maintenance status of this region including the project study area. EPA has since adopted a more stringent 8-hour ozone standard, and although currently considered attainment, the Puget Sound region may once again be designated as

nonattainment for ozone based on the latest standard. Note that because ozone is not emitted directly, only very sophisticated air quality models are capable of considering ozone formation in the atmosphere, and such models are typically used for regional assessments of air quality plans rather than for project-specific reviews. So under current air quality plans and policies, the potential future nonattainment status for ozone probably has no direct implications for the proposed project.

Inhalable Particulate Matter – PM10 and PM2.5

Particulate matter air pollution is generated by many sources, including fuel combustion sources like residential wood burning, motor vehicle engines and tires, and other sources. Federal, state, and local regulations set limits for particles concentrations in the air based on the size of the particles and the related potential threat to health. When first regulated, particle pollution rules were based on concentrations of "total suspended particulate," which included all size fractions. As air sampling technology has improved and the importance of particle size and chemical composition have become more clear, ambient standards have been revised to focus on the size fractions thought to be most dangerous to people. Based on the most recent studies, EPA has redefined the size fractions and set standards for particulate matter based on "coarse" and "fine" inhalable particles to focus control efforts on the smaller size fractions.

There are currently health-based ambient air quality standards for PM10, or particles less than or equal to about 10 micrometers (microns) in diameter, as well as for PM2.5, or particulate matter less than or equal to 2.5 microns in diameter. The latter size fraction and even smaller (ultra-fine) particles are now considered the most dangerous size fractions of airborne particulate matter because such small particles (e.g., a typical human hair is about 100 microns in diameter) can be breathed most deeply into lungs. In addition, such particles are often associated with toxic substances that are deleterious in their own right that can adsorb to the particles and be carried into the respiratory system.

With the revocation of the federal annual standard for PM10 in October 2006, the focus of ambient air monitoring and control efforts related to particle air pollution in the Puget Sound region has been almost entirely on fine particulate matter (PM2.5). There are several PM2.5 monitoring stations in the Puget Sound area, located at known or suspected PM "hot-spots." The closest PM2.5 monitors to the project area are located in Marysville. Based on reported data from that location, measured PM2.5 values are about two-thirds of the current 24-hour NAAQS, and about one-half of the annual NAAQS.

Based on particulate matter measurements over the last few years EPA in 2009 established a PM2.5 nonattainment area in Tacoma. There are no other PM nonattainment areas in Washington.

Carbon Monoxide

Carbon monoxide is the product of incomplete combustion. It is generated by transportation sources and other fuel-burning activities like residential space heating, especially heating with solid fuels like coal or wood. Carbon monoxide is usually the pollutant of greatest concern related to roadway transportation sources because it is the pollutant emitted in the greatest quantity for which there are short-term health standards. CO is a pollutant whose impact is usually localized, and CO concentrations typically diminish within a short distance of roads. The highest ambient concentrations of CO usually occur near congested roadways and intersections during wintertime periods of air stagnation.

The subarea is located within the former Puget Sound region CO nonattainment area (established in 1991) that encompassed a large portion of the Everett-Seattle-Tacoma urban area. Because no monitoring stations had recorded violations of the CO standards in many years, in 1997 EPA redesignated the Central Puget Sound region as attainment for CO. The former nonattainment area remains an air quality maintenance area for CO, but there have been no measured violations of the standards in many years, and the former CO problem is thought to have been resolved.

In the case of projects and plans affecting the transportation system and/or traffic sources, CO is used as an indicator of potential air quality problems because of the various vehicular emissions, CO is the pollutant emitted in the largest quantity for which there are ambient air standards. Therefore, CO was the primary focus of the air quality analysis for this project. The analysis considered future roadway conditions and used screening modeling to assess the potential for air quality impacts related to the proposed project.

Impacts of the Alternatives

Methodology

In accord with EPA guidance, the air quality analysis considered the potential for traffic-related impacts based on conditions at signalized intersections most likely to be adversely affected by the project alternatives. EPA guidance focuses on potentially performing air quality modeling analyses for the most congested signalized intersections based on the overall intersection delay or "level of service" (LOS) during peak-hour conditions. Intersection LOS ranges from "A" (good operation with little or no delay) to "F" (poor operation due to extensive delay). The criteria for selecting intersections for potential inclusion in air quality "hot-spot" modeling are based on signalized intersections operating at LOS "D," "E," or "F," or any expected to change to LOS "D," "E," or "F" as a result of a proposed project. Intersections operating at LOS "C" or better are therefore unlikely to cause a potential violation of the CO standard, and generally do not require further analysis (EPA 1992).

Typically, projects and plans that affect either the physical structure or the operation of the regional transportation system in an air quality nonattainment or maintenance area are subject to an air quality transportation conformity review. Air quality conformity rules are

intended to prevent regionally significant transportation projects from either causing or contributing to localized air quality problems. Transportation improvements for the 20th Street SE Corridor included in the *Preferred Alternative/Alternative 2* include construction of 24th Street SE as a potential alternative route to 20th Street SE, and the development of a roundabout at the intersection of SR-9 with 24th Street SE and South Lake Stevens Road. A conceptual plan regarding the probable structural configuration and likely intersection operational parameters for the Preferred Alternative have been developed, therefore, the plan is subject to an air quality transportation conformity review. A memorandum documenting the travel demand forecasts for this new intersection is contained in Appendix B of the Final EIS. Per EPA guidance, which focuses solely on signalized intersections, air quality modeling analysis is not required for the existing or future No Action *(Alternative 1)* conditions for the subarea plan because the single most affected study intersection would remain unsignalized in future years (EPA, 1992).

To assess the potential for traffic-related air quality impacts, the analysis evaluated the worst-case operating scenario at the most project-affected intersection using the Washington State Department of Transportation screening tool, WASIST. This tool applies worst-case operations and atmospheric dispersion assumptions to estimate CO concentrations at nearby locations. If under these conditions no problematic concentrations are predicted, no CO impacts are likely (WSDOT 2009).

Impacts during Construction - All Alternatives

Construction in future years resulting from development in the 20th Street SE Corridor Subarea could occur with or without the *Preferred Alternative* and could temporarily change localized air quality. Construction activities would be similar under all subarea plan alternatives, so similar short-term changes could occur regardless of which alternative is adopted. For example, dust from construction activities would contribute to ambient concentrations of suspended particulate matter. Construction contractors would have to comply with PSCAA regulations requiring all reasonable precautions be taken to minimize fugitive dust emissions.

Construction would require the use of heavy trucks and smaller equipment such as generators and compressors. These engines would emit air pollutants that would slightly degrade local air quality. Nonetheless, emissions from construction equipment, and especially from diesel-fueled engines, are coming under increasing scrutiny because of their suspected risk to human health. Although there is little or no danger of these emissions resulting in pollutant concentrations that would exceed a health-based ambient air quality standard, pollution control agencies are now urging that emissions from diesel-powered equipment be minimized to the extent practicable in order to reduce potential health risks.

Some phases of construction would cause odors that could be detectable to some people in the area. This would be particularly true during paving operations using asphalt. The construction contractor(s) would have to comply with the PSCAA regulations during

activities that emit odor bearing air contaminants. Such odors from paving operations would be short term.

Construction equipment and material hauling can affect traffic flow in a project area. Given that there is heavy traffic during some periods of the day, scheduling haul traffic during off peak times (e.g., between 9 a.m. and 4 p.m.) would have the least effect on other traffic and would minimize indirect increases in traffic related emissions.

With implementation of required measures to provide reasonable controls of dust and odors, construction activities related to development either with or without the proposed plan would not be expected to result in significant air quality impacts.

Impacts during Operation

The impact analysis employed the WASIST screening tool to examine air quality related to projected traffic with the *Preferred Alternative/Alternative 2* during the future "opening year" (2015), "analysis year" (2025), and "horizon year" (2040), and was based on an assumed background CO concentration of 3 ppm. WASIST model-calculated CO concentrations at all receptor locations are less than the ambient air quality standards for CO with all future scenarios considered. Table 3.1-2 summarizes the maximum CO concentrations from the WASIST modeling results.

Table 3.1-2. Estimated CO Concentrations at the Most Project-Affected Intersection

Intersection SR-9 with 24th Street SE and S Lake Stevens Road	Period	Preferred Alternative/Alternative 2		
		2015 Opening Year	2025 EIS Analysis Year	2040 Horizon Year
	1-Hr	3.8	4.7	4.8
	8-Hr	3.6	4.2	4.3

Mitigation Measures

Mitigation During Construction

Although significant air quality impacts are not anticipated due to construction of the proposed development that would occur under the *Preferred Alternative/Alternative 2*, construction contractors would be required to comply with all relevant federal, state, and local air quality rules. In addition, implementation of best management practices would also reduce emissions related to the construction phase of the project. Possible management practices for reducing the potential for air quality impacts during construction include measures for reducing both exhaust emissions and fugitive dust. The Washington Associated General Contractors brochure Guide to Handling Fugitive Dust from Construction Projects and the PSCAA suggest a number of methods for controlling dust and reducing the potential exposure of people to emissions from diesel equipment. A list of

some possible control measures that could be implemented to reduce potential air quality impacts from construction activities follows:

- Use only equipment and trucks that are maintained in optimal operational condition;
- Require all off-road equipment to have emission reduction equipment (e.g., require participation in Puget Sound Region Diesel Solutions, a program designed to reduce air pollution from diesel, by project sponsors and contractors);
- Use bio diesel or other lower-emission fuels for vehicles and equipment;
- Use car-pooling or other trip-reduction strategies for construction workers;
- Implement restrictions on construction truck and other vehicle idling (e.g., limit idling to a maximum of 5 minutes);
- Spray exposed soil with water or other suppressant to reduce emissions of PM and deposition of particulate matter;
- Pave or use gravel on staging areas and roads that would be exposed for long periods;
- Cover all trucks transporting materials, wetting materials in trucks, or providing adequate freeboard (space from the top of the material to the top of the truck bed), to reduce PM emissions and deposition during transport;
- Provide wheel washers to remove particulate matter that would otherwise be carried off site by vehicles to decrease deposition of particulate matter on area roadways;
- Remove particulate matter deposited on paved, public roads, sidewalks, and bicycle and pedestrian paths to reduce mud and dust; sweep and wash streets continuously to reduce emissions;
- Cover dirt, gravel, and debris piles as needed to reduce dust and wind-blown debris
- Stage construction to minimize overall transportation system congestion and delays to reduce regional emissions of pollutants during construction.

Mitigation During Operation

The air quality analysis indicates the Proposed Planned Action would not result in any significant adverse air quality impacts in the study area. Consequently, no operational impact mitigation measures are warranted or proposed.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts have been identified.

Transportation Conformity Determination

Transportation projects that affect either the physical structure or the operation of the regional transportation system within a nonattainment or maintenance area are subject to an *air quality conformity review* pursuant to state and federal law. These rules are intended to ensure that projects and actions affecting air quality will conform to existing plans and time tables for attaining and maintaining federal health based air quality standards. These rules (40 CFR 93) are known as the *air quality transportation conformity rules*, prohibit regionally significant transportation-related projects in CO, ozone, or particulate matter nonattainment and maintenance areas from causing or contributing to localized violations. The 20th Street SE Corridor Subarea project is not located within or near an ozone or PM10 or PM2.5 nonattainment or maintenance area, so conformity to particulate matter ambient air quality standards is not applicable. There are, however, specific rules for analyzing potential CO impacts in relation to conformity issues for transportation plans and projects. The analysis documented here provides the required project-level transportation conformity review.

The Federal Clean Air Act requires states to take actions to reduce air pollution in nonattainment areas so that federal health-based standards are not exceeded. States must also provide control measures in maintenance areas that will assure attainment of the standards for at least ten years. The framework for meeting these goals is the State Implementation Plan (SIP). As required by the Federal and State Clean Air Acts, Ecology and the PSCAA submitted the ozone and the CO SIPs to the EPA for review, and these plans were approved.

Under section 176(c) of the Clean Air Act as amended in 1990 and adopted by chapter 70.94 RCW (the Washington Clean Air Act of 1991), the Puget Sound Regional Council (PSRC), as the responsible metropolitan planning organization, and WSDOT cannot adopt, approve, or accept any transportation improvement plans, programs, or projects unless they conform to the Washington SIPs.

Conformity with a SIP is defined as complying with the plan's intent to reduce or eliminate the number and severity of violations of an ambient air quality standard, and to achieve expeditious attainment of such standards. The federal and state rules and regulations governing conformity are described in 40 CFR parts 51 and 93 and in WAC 174-420 and require both a regional conformity analysis and sometimes also a site-specific, project-level analysis.

With regard to regional conformity with the SIP, the PSRC (2011) provided the following information:

- The Metropolitan Transportation Plan (MTP) entitled Transportation 2040 was prepared and adopted by the PSRC, and reviewed by the United States Department of Transportation. Regional ozone emissions were analyzed by the PSRC during the development and subsequent updates of the MTP. The plan meets all federal and state air quality conformity requirements, including those for both CO and ozone.
- The current Regional Transportation Improvement Program (RTIP) in 2010-2013 was prepared and adopted by the PSRC and reviewed by the United States Department of Transportation. It was found to meet all federal and state air quality conformity requirements, including those for both CO and ozone.
- The conformity analyses performed by PSRC for Transportation 2040 and the RTIP indicate that regional emissions of CO from all projects included in the plans would not exceed the emissions budget in the maintenance plan allotted for motor vehicles. The findings of the regional air quality conformity analyses indicate that both plans conform to the maintenance plans and federal and state clean air requirements.
- Since the 20th Street SE Corridor Subarea Plan has not yet been adopted, it has not yet been identified individually in the PSRC assessment of the MTP or the RTIP. Therefore, proposed modifications to the regional transportation systems associated with the Subarea Plan have not yet been considered in the regional air quality review which is performed by PSRC. Following plan adoption, the City of Lake Stevens will discuss appropriate review requirements with PSRC. If necessary, the SR-9/24th Street SE improvement project would be considered as part of a future round of regional air quality modeling.

With regard to "project-level" analyses, the proposed improvement project was evaluated for conformance with existing air pollution control plans for CO in accord with the CO conformity guidelines. The air quality analysis documented here, which included screening-level dispersion modeling, comprises a "project-level" conformity review as defined in the clean air rules. The following project-level conformity statement applies.

- A quantitative screening-modeling review indicated that CO “hot-spots” would be unlikely. In the project's future year 2025 and Horizon year 2040, the maximum-predicted CO concentrations near the most project-affected intersections would not exceed the 1-hour or 8-hour ambient air quality standards. The proposed project would not, therefore, create a new violation of the CO air quality standard or worsen the current situation.

Based on these findings, the proposed plan meets project-level conformity requirements.

5. COMMENTS ON THE DRAFT EIS AND RESPONSES TO COMMENTS

This section of the Final EIS includes comments that were received on the Draft EIS and provides responses to those comments. The Draft EIS for the 20th Street SE Corridor Subarea Plan was published on January 24, 2012 and the public comment period extended to March 8, 2012. Notice of publication was published in the Everett Herald, the Lake Stevens Journal, on the City's website, and sent to the Subarea Email List. EIS documents or notices of availability were distributed to agencies, tribes and individuals identified in the Draft EIS Distribution list. A public meeting on the Draft EIS and open house on the subarea plan was held on February 16, 2012.

Written comments on the Draft EIS were received from four agencies and individuals. Two individuals also provided comments at the public meeting. For written comments (Section 5.1), each comment letter is reproduced followed by a response to each comment. Comments are numbered in the margins of the comment letters; numbers identify the number of the particular comment letter and the number of the specific responses. For verbal comments received at the public meeting (Section 5.2), each speaker is identified, his/her comment is summarized, and a response is provided.

5.1 Comment Letters

Letter 1

communitytransit
smile & ride

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www.communitytransit.org
425/348-7100 ph
425/348-2319 fax

Joyce Eleanor
Chief Executive Officer

Rebecca Abelman, SEPA Official
City of Lake Stevens
P.O. Box 257
Lake Stevens, WA 98258

March 7, 2012

Re: 20th Street SE Sub-Area Plan Draft Environmental Impact Statement

Dear Ms. Abelman:

Community Transit appreciates the opportunity to provide comments on long range planning projects and current development proposals being considered by our jurisdictional partners. Because local land use authorities have the greatest impact on our ability to provide transit services, it is our policy to evaluate projects for their compatibility with Community Transit's current operations and Long Range Transit Plan to ensure the agency can continue to provide public transportation and services in an efficient manner throughout Snohomish County. Staff is providing the following comments in response to the Draft Environmental Impact Statement (DEIS) for the Lake Stevens 20th Street SE Sub-Area Plan and Planned Action.

General Comments:

Community Transit applauds the City of Lake Stevens for initiating this sub-area planning process to shape the long term, sustainable development of the subject area. In general, the intensification and diversity of land uses support transit by creating development patterns that reduce the dependency on single purpose drive alone trips, further increasing the demands for alternative travel choices, such at transit. Although the current economy has forced Community Transit to reduce service across our network, we continue to serve 20th Street SE and this corridor is identified as an essential part of our future transit network, see attachment. With this designation, the agency is making the long term commitment to service this corridor and will improve transit service over time, as funding and demand support such increases.

Specific Comments:

Community Transit provides the following comments and suggestions for the City of Lake Stevens' consideration:

1. Pg 1-10 and 1-12 (Table 1-2 Summary of Impacts: Transportation) – Community Transit support the proposed adjustments to the LOS Standards proposed for all the Alternatives. This will not only support a more realistic and financially sustainable system, the increases in congestion encourage mode split changes from the single occupant trips to other transportation alternatives, including transit. Community Transit also supports the proposed pedestrian and bicycle improvements included with Alternatives 2 and 3.

1-1

Also, congestion does impact the agency's ability to serve the area: time equals money. With increases in congestion, Community Transit may need to change existing routes and/or alter the way the City of Lake Stevens is served with transit. We look to the City of Lake Stevens as a partner in helping provide efficient transit service within this corridor by providing transit priority treatments when warranted by congestion. Transit priority treatments include, but are not limited to, High Occupancy Vehicle (HOV) and Business & Transit (BAT) lanes, Transit Signal Priority (TSP) systems to help get though signalized intersections, and Q-jumps. 1-2

2. Pg 1-16 (Green House Gas Emissions – Mitigation) – Community Transit provides the following comments and suggestions regarding proposed mitigation measures to reduce green house gas (GHG) emissions: 1-3

   a. Consider additional mitigation measures such as requiring electric vehicle charging stations and/or priority parking for high occupancy vehicles with future commercial and/or residential developments resulting from the adoption of the subject sub-area plan.

   b. If Alternative 2 or 3 is adopted, and a large employer chooses to locate within the sub-area, the City of Lake Stevens may become an affected jurisdiction in accordance with the Commute Trip Reduction (CTR) Efficiency Act of 2006. A copy of RCW 70.94.527 is enclosed for your reference. Community Transit is the Lead CTR Implementer in Snohomish County, working with 9 affected jurisdictions and 76 large employers. 1-4

   c. Also, the requirement for a mandatory commute trip reduction program should be expanded to include a list of example strategies to meet mode split goals, as defined by the city. Example strategies include, but are not limited to, the requirement for an on-site transportation coordinator for commercial and multi-family residential developments, preferential parking for high occupancy vehicles, educational information about vanpools and carpools, and a transit pass program. 1-5

   d. A general comment regarding the bullet that states, "In conjunction with a commute trip reduction program, expand transit options such as the Community Transit vanpool program and new fixed route bus service." New fixed-route bus services are subject to approval by Community Transit's board of directors, contingent on funding, market demand and public process. 1-6

3. Pg 1-21 through 1-23 (Transportation) – Community Transit provides the following comments and recommendations for the transportation mitigation measures: 1-7

   a. Community Transit supports the proposed changes to the LOS standards for the signalized intersections along 20th Street SE for all alternatives.

   b. If the City moves forward with installation of roundabouts along 20th Street SE, Community Transit requests coordination for the planning and development of such facilities. Transit can operate through roundabouts, but only if they are designed to accommodate the specific requirements of bus traffic. Community Transit routes currently use 20th Street SE and turn north at 91st Avenue SE: the proposed improvements would require buses to navigate several roundabouts. 1-8

c. There is no mention of the non-motorized transportation network in this section: the City may want to consider adopting complete street standards for this area. A complete pedestrian network significantly benefits travel options to driving alone, such as walking, bicycling, and transit. 1-9

d. Community Transit supports the inclusion of transportation demand management (TDM) as a mitigation strategy. This section should include examples of TDM strategies: please see comment 2.c above. 1-10

Community Transit, in partnership with Snohomish County, is currently implementing a corridor-based TDM program, *Curb the Congestion*, in the 20th Street SE corridor. This program is seeing a positive shift in transportation modes. During 2011, 89 participants removed 9,436 total trips from the road by choosing to take the bus, or utilizing a carpool or vanpool. 1-11

4. Pg 2-10, bottom of page for Alternative 2 regarding road, circulation and transit improvements. Community Transit supports several of the proposed improvements, including:

- Completing the expansion of 20th Street SE towards the Hewitt Avenue trestle. Community Transit requests coordination with the city as design work begins for the 20th Street improvements, to ensure efficient and safe transit operations on this transit emphasis corridor. Community Transit previously provided extensive comments to Snohomish County during the design discussions for Phase II for the 20th Street SE road improvements: these comments are still applicable and should be considered for inclusion with any future improvements along 20th Street SE between the Trestle and SR-9. The specific requests included complimentary bus stops with concrete pads at the following intersections along 20th St. SE: Cavalero Road, 79th Avenue SE, 83rd Ave. SE, and 91st Ave SE. A westbound peak-hour HOV lane extending west from 91st Ave. SE to the trestle was also requested. 1-12
- Extend 91st Ave SE south to 24th Ave. SE.
- Construct a new park and ride facility in the area to support employment and retail centers and nodes. An excerpt of Community Transit's Long Range Plan relating to a future park & ride facility in this area is enclosed for your reference. The preferred location for such facility is on the west side of the SR-9 and 20th Street SE intersection.
- Community Transit requests continued discussions regarding the proposed roundabouts along 20th Street SE. See comment 3.b above.

5. Pg 3-31 (Mitigation Measures for GHGs): see comment 2 above. 1-13

6. Pg 3-103 (Existing Transit Services): Community Transit implemented a major service cut on February 20, 2012. Route 280 no longer directly serves the Boeing Plant, instead Boeing employees can transfer to Route 277 at Everett Station; and Route 425 service is being reduced by one trip southbound in the AM and one trip northbound in the PM. The Service Change information is available on Community Transit's website, under the **News** tab, www.commtrans.org. 1-14

Finally, please designate 20th Street SE and SR-9 as transit emphasis corridors for consistency with Community Transit's Long Range Transit Plan and Countywide Planning Policy TR-12. 1-15

7. Pgs 3-107 (Planned Improvements) – Again, Community Transit supports the planned improvements to extend the widening along 20th Street SE west of 91st Ave. SE to the US-2 interchange. See comment 4 above. 1-16
8. Pg 3-121 through 3-136 (Alternative 2 &3 Analysis Results): Community Transit supports the proposed additional roadway projects: extend 24th Street SE between Cavalero Road and SR-9 and extend 91st Avenue SE from 20th Street SE to the new 24th Street SE. 1-17
9. Pg 3-131 (Mitigation measures – concurrency): consider moving towards a fully multi-modal concurrency model that establishes LOS standards for bicycle lanes, sidewalks/trails, and transit, in addition to roads. 1-18
10. Pg 3-132 (Level of Service Threshold): see comment 3.a above. 1-19
11. Pg 3-133 (Intersection-specific mitigation measures): see comment 4 above, bullet 4 regarding roundabouts. 1-20
12. Pg 3-134 (Design alternatives): Community Transit encourages the City to consider an access management plan along 20th Street SE with consolidation of driveways to maintain the efficient movement of vehicles through the corridor as commercial, residential, and offices uses are developed. 1-21
13. Pgs 3-135 &3-136: Community Transit supports the additional mitigation measures to establish a Transportation Benefit District and Transportation Demand Management: see comments 2 above. 1-22

In closing, Community Transit looks forward to working with the City of Lake Stevens as the sub-area plans moves forward. We are available to answer questions and provide additional input, as needed.

Sincerely,

Kate Tourtellot

Kate Tourtellot
Senior Transportation Planner
Community Transit

Responses to Comment Letter No. 1. – Community Transit

1-1 Thank you for the comment. The City is reconsidering its adopted Level of Service Standards as it reviews the draft subarea plan alternatives and the cumulative needs for capital improvements to support future growth.

1-2 The Draft EIS acknowledges (page 3-121 and 3-128) that increased congestion could reduce the speed of transit vehicles; this would occur under the No Action Alternative as well as the other subarea alternatives. However, the subarea plan also includes a robust mitigation program, which would benefit all vehicle traffic, including transit. In addition, encouraging a mixed-use land use pattern and increasing the density of development are intended to make increased use of transit more feasible. The City will continue to work with Community Transit to make transit service more efficient and will consider transit priority treatments.

1-3 Thank you for your comment. Proposed subarea development regulations include a floor area ratio bonus as an incentive to encourage provision of electric vehicle charging stations. Requiring high occupancy vechicle parking in new developments will also be considered.

1-4 Thank you for your comment regarding commute trip reduction programs (RCW 70.94). It is not known at this time if an employer meeting the 100-employee threshold will locate in the 20th Street SE Corridor Subarea. The City plans to monitor growth in the subarea on a regular basis and will adopt a commute trip reduction program conforming with statutory requirements, if appropriate.

1-5 The Draft EIS (page 3-136) identifies commute trip reduction measures as a means to reduce vehicle trip generation and congestion. The City will consider more specific measures, including those noted in the comment, as the details of the implementation program are developed.

1-6 The comment is acknowledged.

1-7 Thank you for your support for revised level of service standards. The City is still discussing an appropriate LOS for the subarea.

1-8 The City will coordinate with Community Transit regarding the design of traffic controls, including roundabouts, along 20th Street SE.

1-9 The comment references the abbreviated discussion of transportation that is contained in the Draft EIS Summary. The Transportation section of the Draft EIS contains a more complete description of the street network and non-motorized system (pages 3-99 through 3-105). As part of the subarea plan, the City is

considering a "layered network" plan, which incorporates similar elements as a complete streets approach, though in a slightly different spatial arrangement.

1-10 Please see the responses to Comments 1-4 and 1-5 above, regarding commute trip reduction. Transportation demand management strategies are also identified on Page 3-136 of the Draft EIS.

1-11 Thank you for your suggestions regarding the Curb the Congestion program.

1-12 Thank you for your support for the road, circulation and transit improvements identified in the Draft EIS. The City will continue to discuss planed improvements that will enhance transit use with Community Transit.

1-13 Please see the response to Comment 1-3 above.

1-14 Thank you for the information regarding transit service changes for Routes 280 and 245. This updated information is hereby incorporated into the text of the EIS.

1-15 The City acknowledges that Community Transit's Long Range Transit Plan (February 2011) identifies 20th Street SE as an artrial transit emphasis corridor. Snohomish County Countywide Planning Policy TR-12 was amended in June 2011, and now requires that cities, working with transit agencies, map the general location of planned major transit facilities in their comprehensive plans; local "designation" is no longer part of the policy. The City will consider an appropriate type of indicator for the subarea plan. Regardless of how it is indicated, the intent of the 20th Street SE Corridor Subarea Plan is to increase the density, intensity and arrangement of land uses so as to encourage greater use of transit. The City will work with Community Transit to implement the transit emphasis corridor designated in the Long Range Transit Plan.

1-16 Please see the response to Comment 1-12 above.

1-17 Thank you for your comment regarding extending 24th Street SE and 91st Ave. SE.

1-18 Thank you for your comment. Note that the Draft 20th Street SE Corridor Subarea Plan (February 2012, Section VI.B.2) describes possible alternative approaches to establishing levels of service based on multiple and primary functions of roadways, including non-motorized.

1-19 Please see the response to comment 1-7 above.

1-20 Please see the response to comment 1-12 above.

1-21 Thank you for the comment regarding access management and consolidation of driveways along 20th Street SE. The City will consider this suggestion.

1-22 Thank you for your expression of support for a transportation benefit district. The City is considering a wide range of transportation financing techniques.

Letter 2

Lake Stevens School District No. 4
Educational Service Center
(425) 335-1500 • FAX (425) 335-1549
12309 22nd St. N.E. • Lake Stevens, Washington 98258-9500

March 8, 2012

Rebecca Ableman, SEPA Responsible Official
City of Lake Stevens
PO Box 257
Lake Stevens, WA 98258

Re: Comments on Draft EIS for 20th Street SE Subarea Corridor Plan

Dear Ms. Ableman,

The Lake Stevens School District appreciates the opportunity to comment on the City of Lake Stevens' draft EIS for the 20th Street SE Corridor Subarea Plan. District representatives have reviewed the draft and attended meetings with the city, and the District would like to comment on two subjects in the EIS.

The District owns four properties within the 20th Street SE corridor study area. Two of these are existing schools, Cavelero Mid High and Glenwood Elementary, and two are undeveloped properties designated for future educational facilities. The District has had positive conversations with the City about the need to retain appropriate zoning for these properties so that the District may develop them in the future for educational purposes. This is very important to the District's long-range planning and we appreciate your consideration. 2-1

The District would also like to comment on the methodology used to determine the number of students that would be generated by each alternative. The District recalculates its student generation rates biennially as part of its Capital Facilities Plan update. The most recent student generation survey was performed in 2010 and collected information on all new residential construction built within the District's boundaries from 2002 through 2008. The survey showed that 2,791 new residential units were built during that period. Of these, only 249 (9%) were multi-family units with two or more bedrooms, and none were single-bedroom units. As a result, the student generation rate for new one-bedroom multi-family units within the District was zero, while the rate for units with two or more bedrooms was determined using a small sample size compared to the total number of new residences. 2-2

The City's plan indicates that a larger percentage of new residential units will be multi-family in Alternatives 2 and 3 than in the No Action Alternative. Of these multi-family units, it is estimated that one-third will be of the one-bedroom variety. The District's concern is that, due to the lack of data on one-bedroom units and the small sample size of units with two or more bedrooms, the numbers of students generated for the EIS may be underestimated. That being

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said, should the actual student generation rates be higher for multi-family units, the number of students generated by alternatives 2 and 3 are still likely to be less than the No Action Alternative as the rates for multi-family units are traditionally lower than new single-family residences.

2-2

The District will update its student generation rate information this year as part of its updated Capital Facilities Plan and it will revisit the estimated number of students generated from each alternative in light of any new information. The District will also monitor new developments as they are built for the number of students that are generated and adjust their plans accordingly.

Thank you again for the opportunity to comment on the draft EIS. . We look forward to following the City's progress and will provide comments again as appropriate.

Sincerely,

Robb Stanton
Director of Operations Services

Cc: Amy Beth Cook, Superintendent
Teresa Main, Assistant Superintendent of Business Services

Responses to Comment Letter No. 2. – Lake Stevens School District No. 4

2-1 Both Alternative 2 and Alternative 3 would apply "public" zoning to the School District properties. The City will continue to communicate with the School District regarding potential zoning for its properties.

2-2 The Draft EIS used the most current information available from the School District regarding student generation, and an estimate of the future split between single family and multifamily units under alternative land use scenarios. Using this data, the Draft EIS is intended to provide a reasonable approximation of the number of students that could be generated in the future and provides an indication of future impacts to the School District. As noted in the *Population* section in the Draft EIS, the population increase associated with the subarea plan alternatives is within the City's current population projection, and therefore, is within the scope of the School District's capital facility planning. The City appreciates that the Draft EIS methodology reflects trends and assumptions about demographics and residential units, which may change over time or be refined based on ongoing analysis. It is acknowledged that the specific number of students generated may change based on updated data. However, the Draft EIS alternatives clearly show the relationship between dwelling unit type and student generation, which is reflected in the School District's formula.

The City's adopted School Impact Mitigation ordinance (LSMC 14.100) is intended to address the impacts of future growth on School District facilities. These regulations require that residential development pay an impact fee; the fee is calculated using a complex formula and is based primarily on information contained in the School District's capital facility plan. For an individual development proposal, the amount of the fee is proportional to the number of students it generates (i.e., the "student factor"). Since this student factor is a key aspect of the formula and thus of the amount of the fee, the School District should advise the City of any changes over time.

Letter 3

Tobiason & Company, Inc.

Land Use Consulting/Landscape Architecture

February 22, 2012

Karen Watkins, Principle Planner
City of Lake Stevens Planning and Community Development Department
P.O. Box 257
1820 Main Street
Lake Stevens, WA 98258

Subject: DEIS for the 20th Street SE Corridor Subarea Plan
Comprehensive Plan Designations for parcel number 29061900301200
AKA: 20th Street Mixed Use (Hewitt Binding Site Plan), LU2011-5
Owner: Duane Smith

Dear Karen:

I am writing on behalf of Duane Smith, the owner of the property described above, and stakeholder in the subarea planning amendments under consideration.

Mr. Smith's parcel is currently zoned *Local Business/Multifamily Residential*. Of the roughly eight acres in the parcel, the three southerly acres are the Business zone and the five to the north are Multifamily. Three alternative amendments are under review in the DEIS. *Alternative 1-No Action* leaves the comprehensive plan designations for his property as they are. *Alternative 2-Intensive Employment/Commercial Emphasis with some Residential Growth*, changes these to *Commercial/Retail* for the 3 acre portion and *Office* for the 5 acres. *Alternative 3-Moderate Employment/Commercial with Emphasis on Residential Growth*, changes these to *Commercial/Retail* for the 3 acre portion, and *Multifamily Residential* for the 5 acres.

Duane Smith has owned this parcel for over 30 years, and has a good grasp of what types of uses will be successful here. He has participated in the comprehensive planning process before, when this parcel was in the County. The current designations are consistent with his past and present preferences, but he is open to a change to a higher intensity commercial zone for the south 3 acres as proposed in alternatives 2 and 3, and a mixed zone which would allow commercial, small office and services, as well as retaining the multifamily use now allowed on his north 5 acres.

3-1

You clarified for me the types of uses envisioned under the Office designation as follows: "the new office district's primary purpose is for business parks/office buildings with some support commercial development and some higher density housing". Based on his familiarity with the area, Mr. Smith finds the office designation, as you described it, unlikely to succeed at this location. Large companies and projects with a fairly exclusive office use would be better placed along Highway 9, where visibility and access are more appropriate. This is consistent with Alternative 3, which does not show office at Duane's

3-2

20434 10th Place SW Seattle WA 98166 206-375-7775 Laurey@Tobiason.Biz

property, but instead tends to place them on Highway 9 &/or 20th Street. While small offices and services would be appropriate at Mr. Smith's site, a *mix* of uses would be most likely to succeed. A more flexible designation, which allows small offices and services (local services for local populations) as well as multifamily use, would be his preference.

The proposed alternatives recognize the logic of a common designation for parcels lying west Mr. Smith's north five acres. West of his property is a ten acre parcel which could possibly be combined with his north five acres in the creation of a multifamily/commercial complex in the future. The current zoning map also shows a common designation for his north 5 acres and properties lying immediately east of them. Access from South Lake Stevens Road across those parcels is a possibility, and a combining of parcels to create a larger project could occur. Alternatives 2 and 3 do not show this common designation with the parcels lying east of his site. This potential for a connection (from his property east to South Lake Stevens Road) and common identity and use should be considered in these alternatives.

3-2

As a summary, Mr. Smith's preference for his parcel is a commercial zone for the south 3 acres, and a mixed use zone which would allow commercial, small office and services, and, importantly, keep the multifamily use currently allowed on his north 5 acres.

We appreciate your keeping us informed regarding the process, and wish to remain actively involved in establishing the allowed uses, and crafting the future vision of this area. Please let us know what steps we need to be involved in to make this possible.

Sincerely,

Laurey Tobiason, President
Principal Planner/Landscape Architect

CC: Duane Smith.

20434 10th Place SW Seattle WA 98166 206-375-7775 Laurey@Tobiason.Biz

Responses to Comment Letter No. 3. – Tobiason & Company

3-1 The comment notes correctly that the land use designations in the Subarea EIS alternatives consider a variety of uses on the referenced properties, including mixed commercial and office in Alternative 2, and mixed commercial and office and high density residential in Alternative 3.

3-2 The proposed zoning for the Preferred Alternative has both Mr. Smith's parcel and the parcel to the west as Mixed-Use Neighorhood. However, the parcels to the east are proposed for High Urban Residential zoning. The different zoning districts does not affect the potential for access from South Lake Stevens Road.

Letter 4

From: bableman@lakestevenswa.gov
Sent: Friday, March 02, 2012 9:58 AM
To: michtu@gmail.com
Cc: kwatkins@lakestevenswa.gov; rwright@lakestevenswa.gov; Richardw-llc@comcast.net
Subject: RE: 20th Street Subarea Feedback

Thank you for your comment Michael and I will make sure these included in the record. I appreciate your attention to this effort.

Becky

From: Michael Turner [mailto:michtu@gmail.com]
Sent: Thursday, March 01, 2012 8:52 PM
To: Becky Ableman
Subject: 20th Street Subarea Feedback

Hi Becky,

I just had a couple of quick comments on the 20th street subarea plan.
First, I would be behind the 2nd option or really any plan that focuses on employment. Understanding that it would still mean retail, but we have Lake Stevens Center for that focus really close, but we don't really have an employment center. The economic study shows retail leakage, but I get the impression from my commute down highway 9 that most people leave the area for employment as well. Being able to have that employment center not only helps revenue, but helps the retail center as well because there should be more people in the area through-out the day. In addition, it could theoretically help ease the intersections as well because not everyone would be heading in the same direction. 4-1

Second, I understand that the city is going to need to make an investment in infrastructure to help attract both developers and tenants, but I would oppose a Transportation Benefit District to achieve those goals. A TBD contains too many broad powers such as levying additional property taxes, that can diminish transparency. I wrote to Dave Somers opposing the counties creation of one for rural areas for the same reason. If indeed we need additional money for expansion I would rather see something an increase in sales tax that has a defined beginning and end to achieve the specific purpose. 4-2

Otherwise I think you guys have addressed my concerns and to be honest I look forward to seeing the transformation begin.

Thanks,

Michael Turner

8516 5TH PL SE

Lake Stevens, WA 98258

Responses to Comment Letter No. 4. – Michael Turner

4-1 Thank you for the expression of support for Alternative 2 and its emphasis on employment. The City Council selected Alternative 2 as the Preferred Alternative. You note correctly that the City experiences retail leakage and an exodus of residents commuting to jobs outside the City. Creating an employment center in the 20th Street SE Corridor would allow more residents to work in the City.

4-2 Thank you for your comment regarding transportation benefit districts (TBDs). TBDs, which are authorized in RCW 36.73, are a means to supplement local revenues for transportation improvements through specified taxes and fees. The City acknowledges the concerns expressed in the comment regarding transparency and believes that the statutory program authorizing TBDs expresses those concerns. Formation of a TBD itself is subject to voter approval. Although a TBD governing board has the power to impose several taxes and fees, these powers are circumscribed by statutory requirements and require voter approval. For example, a TBD may levy a property tax above the 1 percent limitation but such tax requires voter approval and is limited to one year (RCW 36.73.060). Similarly, imposition of vehicle license fees is limited in amount and subject to voter approval.

5.2 Public Meeting Comments

The February 16th meeting for the 20th Street SE Corridor was a combined meeting on the draft subarea plan and the Draft EIS, and comments and questions addressed both documents.

Commenter: Dave Martin

1. What is the timing of adoption of the subarea plan?

   Response: The City's Planning Commission and City Council began reviewing the Draft 20th Street SE Corridor Subarea Plan, Draft EIS and implementation programs (e.g., zoning code and zoning map) in March 2012. They are also considering the Lake Stevens Center Draft Subarea Plan and Draft EIS at the same time, to ensure that the cumulative impacts and cumulative service and facility needs associated with both subareas are considered together. As of this writing, public hearings on the subarea plan are anticipated to begin in August, and adoption of the plan and implementation programs could occur in Fall 2012.

2. Why would developers be motivated to come to Lake Stevens? Are tax abatement or reduced mitigation requirements being considered?

   Response: The City of Lake Stevens provides a high quality of life to residents and is projected to experience substantial growth over the next 20 years. There will, therefore, be demand for both housing and services. The Lake Stevens School District is recognized nationally for the quality of education; many teachers have won national

teaching awards, and many students have won national educational competitions. This reputation is an attraction for families with school age children. The 20th Street SE Corridor Subarea contains significant development potential, including large undeveloped parcels which will be attractive to developers. The vision for the subarea includes maintaining this high quality of life while attracting greater amounts of employment, which will improve the City's jobs-housing balance and generate additional revenue.

The City intends to designate the 20th Street SE Corridor Subarea as a planned action, which will provide an additional incentive for development. A planned action provides greater certainty to developers regarding the types and level of improvements and mitigation that will be required. It will also reduce the need for future project-specific SEPA review for projects that are consistent with the Subarea Plan, which will save developers time, money and uncertainty. This technique is an effective incentive that has been used by about two dozen cities in Washington.

State law severly limits the ability of cities to reduce mitigation requirements or to provide tax abatement. Mitigation requirements, such as those required by the City's adopted regulations for wetlands, must meet scientific and legal criteria. The City cannot, for example, modify these regulations to accommodate an individual project or to encourage development generally. Note, however, that the Draft EIS does recommend that the City consider off-site wetland mitigation banking as a tool that could provide additional flexibility for unavoidable impacts to wetlands.

Similarly, cities can provide tax abatements only if they are specifically authorized by state law. Few are available. One tax incentive that might be effective is the tax credit that is provided by RCW 84.14 for new and rehabilitated multifamily housing in urban centers. It is not clear whether housing costs currently meet the criteria in the statute, but the the City will consider this further.

However, any tax abatement would also reduce the revenues that flow to the City from new development. And that will constrain the City's ability to provide the facilities and services that are needed to support the growth planned for the subarea. The City appreciates that finding the right balance is a difficult decision.

Commenter: Tom Hogue

1. The subarea plan is intended to create new jobs, but new workers won't necessarily live in Lake Stevens. This could increase commuting and traffic.

   Response: Expanding the City's employment base and creating a better balance of housing and jobs will accomplish a number of objectives, including generating additional revenues that can be used for parks, infrastructure and important public services. The comment is correct that the City cannot guarantee that new jobs will be

filled by Lake Stevens residents; workers may commute to the City from other parts of the County. At the same time, providing greater employment will increase the opportunity for local residents to find jobs within the City. And achieving higher densities, as is proposed in the plan, can make the City eligible for improved transit service, which could help reduce auto traffic.

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7. ACRONYMNS & ABBREVIATIONS

ADT	Average daily traffic
AMI	Average monthly income
BMP	Best Management Practices
BOD	Biochemical Oxygen Demand
CIP	Capital Improvement Program
CO	Carbon monoxide
COE	U.S. Army Corps of Engineers
CO2	Carbon dioxide
CO2e	Carbon dioxide equivalent
DART	Dial-A-Ride Transit
DNR	Washington Department of Natural Resources
DOE	Washington Department of Ecology
DEIS	Draft environmental impact statement
DS	Determination of significance
DU	Dwelling units
EIS	Environmental impact statement
EMS	Emergency medical services
EPA	U.S. Environmental Protection Agency
ERU	Equivalent residential unit
ESA	Endangered Species Act
FAZ	Forecast analysis zone
FEIS	Final environmental impact statement
FEMA	Federal Emergency Management Administration
FIRE	Finance, insurance and real estate
GHG	Greenhouse gases
GMA	The Washington Growth Management Act, RCW 36.70A
GPM	Gallons per minute
GSF	Gross square feet
HCM	Highway Capacity Manual
LEED	Leadership in Energy and Environmental Design
LID	Low impact development
LOS	Level of service
LSMC	Lake Stevens Municipal Code

LSPD	Lake Stevens Police Department
LSSD	Lake Stevens Sewer District
MG	Million gallons
MGD	Million gallons daily
MLS	Multiple Listing Service
MTCO2e	Metric ton carbon equivalent
MTP	Metropolitan Transportation Plan
NAAQS	National Ambient Air Quality Standards
NHP	Washington Natural Heritage Program
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
OFM	Washington Office of Financial Management
PHS	Priority Habitat and Species database
PM10	Particulate matter equal to or less than 10 micrometers in diameter
PM2.5	Particulate matter equal to or less than 2.5 micrometers in diameter
PPM	Parts per million
PSCAA	Puget Sound Clean Air Agency
PSRC	Puget Sound Regional Council
PUD#1	Public Utility District # 1
RCW	Revised Code of Washington
RTIP	Regional Transportation Improvement Program
RUTA	Rural Urban Transition Area
SEPA	State Environmental Policy Act, RCW 43.21C and WAC 197-11
SIP	State Implementation Program
SR	State Route
TBD	Transportation Benefit District
TDM	Transportation demand management
TIP	Transportation Improvement Program
TOD	Transit-oriented development
TOS	Total Suspended Solids
UGA	Urban Growth Area
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service

V/C	Volume to capacity ratio
VMT	Vehicle miles travelled
WAC	Washington Administrative Code
WASIST	Washington State Department of Transportation screening tool
WCTU	Wholesale trade, communication and utilities
WDFW	Washington Department of Fish and Wildlife
WSDOT	Washington Department of Transportation
WWTP	Wastewater Treatment Plant

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8. DISTRIBUTION LIST

The following parties were provided with a notice of availability of the Draft EIS. Those entities denoted with an asterisk (*) received a copy of the document.

Federal Agencies
U.S. Army Corps of Engineers *
U.S. Environmental Protection Agency *
U.S. Fish & Wildlife Service *
National Atmospheric and Oceanic Administration *

State Agencies
Washington Department of Archaeology & Historic Preservation *
Washington Department of Commerce *
Washington Department of Ecology SEPA Unit *
Washington Department of Fish & Wildlife *
Interagency Commission on Outdoor Recreation
Washington Department of Natural Resources *
Washington State Department of Transportation *

Tribes
Tulalip Tribes *
Stillaguamish Tribe
Sauk-Suiattle Tribe *

Regional and Local Governments
City of Arlington *
City of Everett *
City of Lake Stevens *
City of Marysville *
City of Snohomish *
Community Transit *
Snohomish County Planning & Development Services *
Snohomish Health District *
Puget Sound Clean Air Agency *
Puget Sound Regional Council *

Special Purpose Districts
Lake Stevens Fire District *
Lake Stevens Sewer District *
Lake Stevens School District *
Marysville School District *
Puget Sound Energy *

Snohomish County PUD *
Snohomish School District *

Public Libraries
Lake Stevens Library *

Community Organizations
Economic Development Council of Snohomish County *
Lake Stevens Chamber of Commerce *

Media
Everett Herald *
Lake Stevens Journal *

Private Firms & Individuals
Sue Ambler
Camie Anderson
Merle Ash
Erik Ashlie
Janet Backus
Tom Bahr
Jerry Bayha
Stephanie Baron
Russ Bosanko
Will Brandt
Bart Brynestad
Carla Busby
Jim Busby
John C. Cannon
George Capestany
James & Christina Chapin
Steve Clagett
Comcast Cable (Casey Brown) *
Ron Cushman
Lorrie Davidson
Gloria Davis
Matt Dixon
Crystal Donner
Doug Ecklund
Jess Eline
Chris Fenwick
Jessica Fenwick
Futurewise (Kristen Kelly, Tim Trohimovich) *
Ruth Fletcher

Debe Franz
Kathleen Friend
David Gibson
David Graef
Mike Hansen
Tom Hoban
Dave & Wendy Hueser
Steve Iblings
Mike Jauhola
Kimco Realty
Laana Larson
Larsen Financial Services (Jim Larsen)
Brad Lincoln
Jonette Limantzakis
Chief Dave Lingenfelter
Don Lundquist
Tom Matlack
Master Builders Association (Mike Pattinson) *
David Matulich
Kevin McDaniel
Glenn McLoughlin
Barry Miller
Kathy Milton
Robert Milton
Darrell Moore
Barbara Mounsey
Leigh Nelson
Jim Nottoli
Steve & Darlene Owens
James B. Potter
Keith & Corrie Perry
Steve Pesce
Darron Pyper
Chris Radosovich
Noah Reandeau
Richard Reese
Republic Services (Don Frey)
Ridgeline Management Company
Scott Ritterbush
Brittney Rourke
Dennis & Meri Scafe
James & Elaine Schroedl
Paula Simonson
Darwin Smith

Jozette Smith
John Spaulding
James Spitzer, PMF Investments
Joel St. Marie
Robb Stanton
Tracy Stevens
Steve Smith
Alan Tandy
Team Fitness
Tom Thorleifson
Laurey Tobiason
Kate Tourtellot
Michael & Stacy Turner
Keith Tyson
Marilyn Webber
Mary Wicklund
Kevyn Williams
Ken Withrow
Jean Wrona
Peter Zuvela

Appendix A

Draft Planned Action Ordinance

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ORDINANCE NO. 878

AN ORDINANCE OF THE CITY OF LAKE STEVENS, WASHINGTON ESTABLISHING A PLANNED ACTION FOR THE 20TH STREET SE CORRIDOR SUBAREA PURSUANT TO THE STATE ENVIRONMENTAL POLICY ACT (CHAPTER 43.21C RCW AND WAC 197-11-164)

WHEREAS, the State Environmental Policy Act (SEPA) (Chapter 43.21C RCW) and implementing rules (WAC 197-11-164) provide for the integration of environmental review with land use planning and project review through designation of "Planned Actions" by jurisdictions planning under the Growth Management Act (GMA) (Chapter 36.70A RCW); and

WHEREAS, on July 27, 2006 the Lake Stevens City Council enacted Ordinance No. 726 adopting an updated Comprehensive Plan for the City of Lake Stevens complying with the GMA; and

WHEREAS, on November 27, 2006, Ordinance No. 739 was adopted to adopt Comprehensive Plan provisions consistent with the incomplete provisions adopted in Ordinance No. 726; and

WHEREAS, the Growth Management Act allows jurisdictions to amend comprehensive plans once a year, except in those situations enumerated in RCW 36.70A.130(2)(a); and

WHEREAS, RCW 36.70A.130(2)(a)(i) and (v) allows jurisdictions to amend the comprehensive plan with initial adoption of a subarea plan and adoption of comprehensive plan amendments necessary to enact a planned action under RCW 43.21C.031(2); and

WHEREAS, the City is concurrently adopting a subarea plan, land use map, zoning map, and comprehensive plan amendments in association with this Planned Action Ordinance; and

WHEREAS, the City held workshops and open houses to elicit public input on the subarea plan on March 29 and July 14, 2011; and

WHEREAS, the City has prepared a subarea plan for the 20th Street SE Corridor, which is referred to as the Planned Action Area; and

WHEREAS, the City issued a Determination of Significance and request for comments on the scope of the environmental impact statement on June 28, 2011 and held a Scoping Meeting on July 14, 2011; and

WHEREAS, on January 24, 2012 the City issued a Draft environmental impact statement (EIS) for the 20th Street SE Corridor Subarea Plan which identifies impacts and mitigation measures associated with planned development in the subarea; and

WHEREAS, on July 31, 2012 the City issued a Final environmental impact statement (EIS) for the 20th Street SE Corridor Subarea Plan which identifies impacts and mitigation measures associated with planned development in the subarea; and

WHEREAS no appeal was made to the Final environmental impact statement; and

WHEREAS, on July 18, 2012 the City held a community meeting, prior to issuing notice for the adoption of the planned action ordinance; and

WHEREAS, pursuant to Chapter 43.21C RCW, the City held community meetings on the Planned Action Ordinance before adoption including one on July 18, 2012 for conversations with City Staff, two Planning Commission public hearings on August 1 and 15, 2012 and three City Council public hearings on August 31 and September 10 and 24, 2012; and

WHEREAS, in taking the actions set forth in this ordinance, the City has complied with the requirements of the State Environmental Policy Act, Ch. 43.21C RCW; and

WHEREAS, the City is concurrently adopting development regulations and design guidelines for the subarea which will help protect the environment; and

WHEREAS, on July 6, 2012 the City submitted the proposed 20th Street SE Corridor Subarea Plan, Comprehensive Plan Land Use Map and Zoning Map amendments, Subarea Land Use Map, proposed development regulations and design guidelines, and other comprehensive plan and development regulations amendments to the Washington State Department of Commerce for its 60-day review and received a letter dated July 9, 2012 stating the procedural requirements were met; and

WHEREAS, the Department of Commerce's 60-day review period was completed on September 7, 2012 and any Department comments are addressed in this Ordinance; and

WHEREAS, on August 1 and 15, 2012 the Planning Commission, after review of the proposed 20th Street SE Corridor Subarea Plan, Comprehensive Plan Land Use Map and Zoning Map amendments, Subarea Land Use Map, proposed development regulations and design guidelines, and other comprehensive plan and development regulations amendments, held a duly noticed public hearing on the amendment, and all public testimony was given full consideration before making a recommendation to the City Council to approve the proposed Subarea Plan, map amendments, and other text amendments; and

WHEREAS, on August 27, and September 10 and 24, 2012, the Lake Stevens City Council reviewed the Planning Commission's recommendation relating to the proposed 20th Street SE Corridor Subarea Plan, Comprehensive Plan Land Use Map and Zoning Map amendments, Subarea Land Use Map and Subarea Zoning Map, proposed development regulations and design guidelines, and other comprehensive plan and development regulations amendments, and held a duly noticed public hearing, and all public testimony and arguments have been given full consideration; and

WHEREAS, designation of a Planned Action expedites the permitting process for subsequent, implementing projects whose impacts have been previously addressed in a Planned Action EIS, and thereby encourages desired growth and economic development; and

WHEREAS, the 20th Street SE Corridor Subarea is deemed to be appropriate for designation of a Planned Action.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF LAKE STEVENS, WASHINGTON, DO ORDAIN AS FOLLOWS:

SECTION 1. Purpose**.** The City Council declares that the purpose of this ordinance is to:

A. Combine analysis of environmental impacts with the City's development of plans and regulations;

B. Designate the 20th Street SE Corridor Subarea as a Planned Action for purposes of environmental review and permitting of subsequent, implementing projects pursuant to the State Environmental Policy Act (SEPA), RCW 43.21C.031;

C. Determine that the EIS prepared for the subarea plan meets the requirements of a Planned Action EIS pursuant to SEPA;

D. Establish criteria and procedures, consistent with state law, that will determine whether subsequent, implementing projects qualify as Planned Actions;

E. Provide the public with information about Planned Actions and how the City will process applications for implementing projects;

F. Streamline and expedite the land use review and approval process for qualifying projects by relying on the environmental impact statement (EIS) completed for the Planned Action; and

G. Apply the City's development regulations together with the mitigation measures described in the EIS and this Ordinance to address the impacts of future development contemplated by the Planned Action.

SECTION 2. Findings**.** The City Council finds as follows:

A. The City is subject to the requirements of the Growth Management Act, RCW 36.70A, and is located within an Urban Growth Area;

B. The City has adopted a Comprehensive Plan complying with the GMA, and is amending the Comprehensive Plan to incorporate a subarea element specific to the 20th Street SE Corridor Planned Action Area;

C. The City is adopting development regulations and design guidelines concurrent with the Subarea Plan to implement said Plan;

D. The City has prepared an EIS for the 20th Street SE Corridor Subarea and finds that this EIS adequately addresses the probable significant environmental impacts associated with the type and amount of development planned to occur in the designated Planned Action Area;

E. The mitigation measures identified in the Planned Action EIS and attached to this ordinance as Exhibit B, together with adopted subarea development regulations and design guidelines, will adequately mitigate significant impacts from development within the Planned Action Area;

F. The subarea plan and Planned Action EIS identify the location, type and amount of development that is contemplated by the Planned Action;

G. Future projects that are implemented consistent with the Planned Action will protect the environment, benefit the public and enhance economic development within the City;

H. The City has provided numerous opportunities for meaningful public involvement in the proposed Planned Action; has considered all comments received; and, as appropriate, has modified the proposal or mitigation measures in response to comments;

I. The 20th Street SE Corridor Subarea Plan is not an essential public facility as defined by RCW 36.70A.200(1). Future improvements to state highways within the subarea are not eligible for review or permitting as Planned Actions. However, such future proposals may use the information contained in the Planned Action EIS, consistent with SEPA;

J. The Planned Action Area is a defined area that is smaller than the overall City boundaries; and

K. Public services and facilities will be adequate to serve the proposed Planned Action with implementation of mitigation measures identified in the EIS.

SECTION 3. Procedures and Criteria for Evaluating and Determining Projects as Planned Actions.

A. *Planned Action Area*. The Planned Action designation shall apply to the area shown in Exhibit A.

B. *Environmental Document*. A Planned Action determination for a site-specific implementing project application shall be based on the environmental analysis contained in the Draft EIS issued by the City on January 24, 2012 and the Final EIS published on July 31, 2012. The Draft and Final EISs together shall comprise the Planned Action EIS. The mitigation measures contained in Exhibit B are based upon the findings of the Planned Action EIS and shall, along with adopted City regulations, provide the framework that the City will use to impose appropriate conditions on qualifying Planned Action projects.

C. *Planned Action Designated*. Land uses and activities described in the Planned Action EIS, subject to the thresholds described in subsection 3.D and the mitigation measures contained in Exhibit B, are designated Planned Actions or Planned Action Projects pursuant to RCW 43.21C.031. A development application for a site-specific project located within the 20th Street SE Corridor Subarea shall be designated a Planned Action if it meets the criteria set forth in subsection 3.D of this ordinance and applicable laws, codes, development regulations and standards of the City.

D. *Planned Action Qualifications*. The following thresholds shall be used to determine if a site-specific development proposed within the 20th Street SE Corridor Subarea is contemplated by the Planned Action and has had its environmental impacts evaluated in the Planned Action EIS:

(1) Land Use. The following general categories/types of land uses, which are permitted or conditionally permitted in zoning districts applicable to the 20th Street SE Corridor Planned Action Area, are considered Planned Actions:

(a) Retail and service activities;
(b) Civic and cultural uses which are not defined as essential public facilities;
(c) Office uses;
(d) Commercial uses;
(e) Lodging, such as hotels and motels;
(f) Residential dwelling units; and
(g) Infrastructure improvements identified in the EIS to support planned land uses.

Individual land uses considered to be Planned Actions shall include those uses specifically listed in development regulations applicable to the zoning classifications applied to properties within the Planned Action Area.

(2) Development Thresholds.

(a) The following amount of various new land uses are contemplated by the Planned Action:

Land Use[1]	Development Thresholds
Residential	1,000 units
Commercial[2]	450,000 gross square feet
Employment[3]	1.25 million gross square feet

[1] A building with multiple uses will be designated by the majority use.
[2] Commercial includes accommodation services, arts and entertainment, food services, retail trade, etc.
[3] Employment includes corporate offices, general offices, research and development, medical clinics, technology, light manufacturing and assembly, etc.

(b) Local road projects identified in the EIS to support planned levels of growth identified in subsection (2)(a) are considered planned actions, except for 24th Street SE.

(c) Shifting the total build out between categories of uses may be permitted so long as the total build out does not exceed the aggregate amount of development and the trip generation reviewed in the EIS, and so long as the impacts of that development have been identified in the Planned Action EIS and are mitigated consistent with Exhibit B.

(d) If future development proposals in the 20th Street SE Corridor Planned Action Area exceeds the development thresholds specified in this ordinance, further environmental review may be required pursuant to WAC 197-11-172. In addition, if proposed development would alter the assumptions and analysis in the Planned Action EIS, further environmental review may be required.

(3) Building Height. Building height shall not exceed those permitted in the underlying zoning district(s) pursuant to the standards of the Lake Stevens Municipal Code.

(4) Transportation.

(a) *Trip Ranges & Thresholds*. The numbers of new PM peak hour trips anticipated in the Planned Action Area and reviewed in the EIS are as follows:

Total Transportation PM Peak Hour	3,441 trips

Uses or activities that would exceed these maximum trip levels will require additional SEPA review.

(b) *Concurrency*. The determination of transportation impacts shall be based on the City's concurrency management program contained in Chapter 14.110 LSMC.

(c) *Off-Site Mitigation*. As provided in the EIS and Chapter 14.110 LSMC, in order to mitigate transportation related impacts, all Planned Action Projects shall pay a traffic impact mitigation fee to participate in and pay a proportionate share of off-site improvements consistent with Chapter 14.112 LSMC and the current Fees Resolution.

(d) *Director Discretion*. The Director of Public Works shall have discretion to determine incremental and total trip generation, consistent with the latest edition of the Institute of Traffic Engineers (ITE) Trip Generation Manual or an alternative manual accepted by the Director of Public Works at his or her sole discretion, for each project permit application proposed under this Planned Action.

(5) Elements of the Environment and Degree of Impacts. A proposed project that would result in a significant change in the type or degree of impacts to any of the elements of the environment analyzed in the Planned Action EIS, or that causes significant impacts to an element of the environment that was not considered in the Planned Action EIS, would not qualify as a Planned Action.

(6) Changed Conditions. Should environmental conditions change significantly from those analyzed in the Planned Action EIS, the City's SEPA Responsible Official may determine that the Planned Action designation is no longer applicable until supplemental environmental review has been conducted.

E. **Planned Action Review Criteria**.

(1) The City's SEPA Responsible Official may designate as "Planned Actions", pursuant to RCW 43.21C.030, applications that meet all of the following conditions:

(a) Proposal is located within the Planned Action Area identified in Exhibit A of this ordinance;

(b) Proposed uses and activities are consistent with those described in the Planned Action EIS and Section 3.D of this ordinance;

(c) Proposal is within the Planned Action thresholds and other criteria of Section 3.D of this ordinance;

(d) Proposal is consistent with the City of Lake Stevens Comprehensive Plan;

(e) Proposal's significant adverse environmental impacts have been identified in the Planned Action EIS;

(f) Proposal's significant impacts have been mitigated by application of the measures identified in Exhibit B, and other applicable city regulations, together with any modifications or variances or special permits that may be required;

(g) Proposal complies with all applicable local, state and/or federal laws and regulations, and the SEPA Responsible Official determines that these constitute adequate mitigation; and

(h) Proposal is not an essential public facility as defined by RCW 36.70A.200(1), unless an essential public facility is accessory to or part of a project that is designated as a planned action.

(2) The City shall base its decision on review of a SEPA checklist, or an alternative form adopted with Planned Action Ordinance, and review of the application and supporting documentation.

(3) A proposal that meets the criteria of this section shall be considered to qualify and be designated as a Planned Action, consistent with the requirements of RCW 43.21C.030, WAC 197-11-164 et seq., and this ordinance.

F. **Effect of Planned Action**

(1) Designation as a Planned Action Project means that a qualifying proposal has been reviewed in accordance with this ordinance and found to be consistent with its development thresholds, and with the environmental analysis contained in the Planned Action EIS.

(2) Upon determination by the City's SEPA Responsible Official that the proposal meets the criteria of Section 3.D and qualifies as a Planned Action, the proposal shall not require a SEPA threshold determination, preparation of an EIS, or be subject to further review pursuant to SEPA.

G. **Planned Action Permit Process**. Applications for Planned Actions shall be reviewed pursuant to the following process.

(1) Development applications shall meet all applicable requirements of the Lake Stevens Municipal Code (LSMC). Applications for Planned Actions shall be made on forms provided by the City and shall include a SEPA checklist, or an approved Planned Action checklist.

(2) The City's Director of Planning and Community Development or designee shall determine whether the application is complete as provided in LSMC 14.16A.220(f).

(3) If the application is for a project within the Planned Action Area defined in Exhibit A, the application will be reviewed to determine if it is consistent with the criteria of this ordinance and thereby qualifies as a Planned Action Project. The SEPA Responsible Official shall notify the applicant of his/her decision. If the project is determined to qualify as a Planned Action, it shall proceed in accordance with the applicable permit review procedures specified in Chapter 14.16B LSMC, except that no SEPA threshold

determination, EIS or additional SEPA review shall be required. The decision of the SEPA Responsible Official regarding qualification as a Planned Action shall be final.

(4) Public notice of the determination that a project qualifies as a planned action project, pursuant to Chapter 43.21C RCW, shall be mailed or otherwise verifiably provided to:

(a) All affected federally recognized tribal governments; and

(b) Agencies with jurisdiction over the future development anticipated for the planned action.

The notice shall state that the project has qualified as a planned action. Other notice may be required for the underlying permit.

(5) Development Agreement.

(a) To provide additional certainty about applicable requirements, the City or an applicant may request consideration and execution of a development agreement for a Planned Action Project. The development agreement may address review procedures applicable to a Planned Action Project, permitted uses, mitigation measures, payment of impact fees or provision of improvements through other methods, design standards, phasing, vesting of development rights, or any other topic that may properly be considered in a development agreement consistent with RCW 36.70B.170 et seq.

(b) A development agreement may also include alternative mitigation measures proposed by an applicant, provided that such alternative measures shall provide mitigation that is equivalent to or better than that identified in the Planned Action EIS. The determination that mitigation measures are equivalent shall be made by the SEPA Responsible Official.

(6) If a project is determined to not qualify as a Planned Action, the SEPA Responsible Official shall so notify the applicant and prescribe a SEPA review procedure consistent with the City's SEPA regulations and the requirements of state law. The notice shall describe the elements of the application that result in failure to qualify as a Planned Action.

(7) Projects that fail to qualify as Planned Actions may incorporate or otherwise use relevant elements of the Planned Action EIS, as well as other relevant SEPA documents, to meet their SEPA requirements. The SEPA Responsible Official may limit the scope of SEPA review for the non-qualifying project to those issues and environmental impacts not previously addressed in the Planned Action EIS.

SECTION 4. Monitoring and Review.

A. The City shall monitor the progress of development in the designated Planned Action Subarea to ensure that it is consistent with the assumptions of this ordinance and the Planned Action EIS regarding the type and amount of development and associated impacts, and with the mitigation measures and improvements planned for the 20th Street SE Corridor Planned Action Area.

B. This Planned Action Ordinance shall be reviewed by the SEPA Responsible Official when development with the Planned Action Area is approaching maximum

threshold levels or no later than five years from its effective date to determine the continuing relevance of its assumptions and findings with respect to environmental conditions in the Planned Action Area, the impacts of development, and required mitigation measures. Based upon this review, the City may propose amendments to this ordinance or may supplement, addend or amend the Planned Action EIS.

SECTION 5. Conflict. In the event of a conflict between this Ordinance or any mitigation measure imposed thereto, and any ordinance or regulation of the City, the provisions of this ordinance shall control, EXCEPT that the provision of any International Code shall supersede.

SECTION 6. Severability. If any section, clause, phrase, or term of this ordinance is held for any reason to be invalid or unconstitutional, such decision shall not affect the validity of the remaining portions of this ordinance, and the remaining portions shall be in full force and effect.

SECTION 7. Effective Date and Publication. A summary of this ordinance consisting of its title shall be published in the official newspaper of the City. This ordinance shall take effect and be in full force five days after the date of publication.

PASSED by the City Council of the City of Lake Stevens this ___ day of _____, 2012.

_____
Vern Little, Mayor

ATTEST/AUTHENTICATION:

_____
Norma J. Scott, City Clerk/Admin Asst.

APPROVED AS TO FORM:

_____
Grant K. Weed, City Attorney

First Reading:
Published:
Effective Date:

EXHIBIT A
PLANNED ACTION AREA

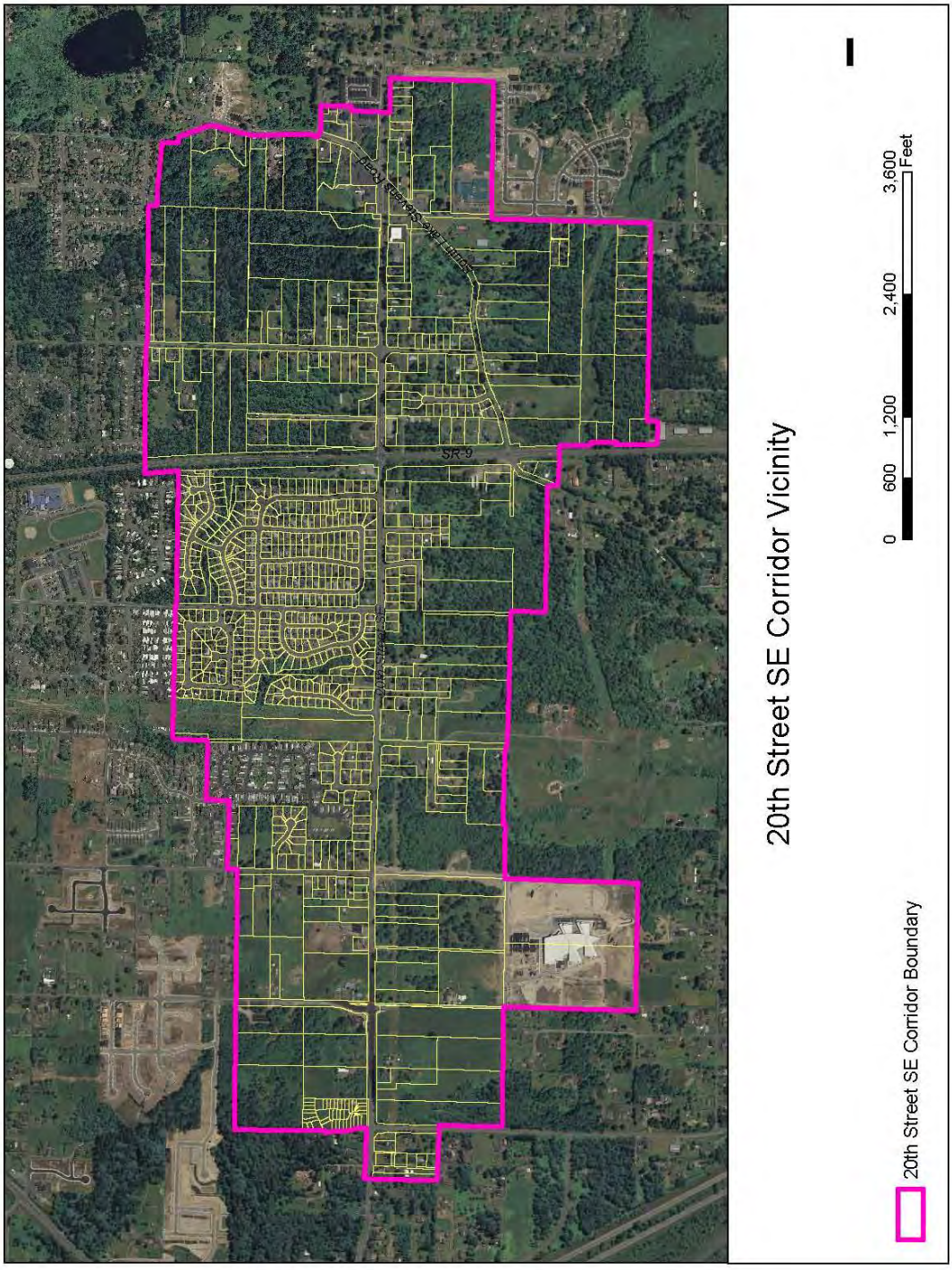
20th Street SE Corridor Vicinity
0
600
1,200
2,400
3,600
Feet
20th Street SE Corridor Boundary
SR-9

EXHIBIT B
20th STREET SE CORRIDOR SUBAREA PLAN PLANNED ACTION ORDINANCE MITIGATION MEASURES

In compliance with the State Environmental Policy Act (SEPA), the City of Lake Stevens prepared and published draft and final environmental impact statements (collectively "the EIS") for the 20th Street SE Corridor Subarea Plan. The EIS identifies significant impacts to the environment that would occur as a result of future growth in the subarea, along with mitigation measures that would avoid, reduce, minimize or compensate for those impacts. The City will designate the subarea as a Planned Action for purposes of future environmental review, consistent with the requirements of RCW 43.21C.031 and WAC 197-11-164 et seq.

This exhibit to the Planned Action Ordinance summarizes mitigation measures identified in the EIS. The EIS should be reviewed to understand the full context of measures for each element of the environment. As part of its review of future development proposals within the Planned Action Area (Exhibit A), and to determine whether such proposals qualify as planned actions, the City will review the measures identified herein and require them as conditions of approval.

It should be noted that some mitigation measures identified in the EIS have already been accomplished (such as adoption of a planned action ordinance) and are not included in this exhibit. References are provided for measures that rely on adopted provisions of the Lake Stevens Municipal Code. In addition, while most mitigation measures identified in the EIS apply to development projects (public or private), a few provide direction to the City for future planning and regulatory programs. The City will consider these as part of its ongoing planning processes, including any required monitoring.

1. Natural Environment

A. Earth

Applicable Regulations and Commitments

- **Geological Assessments Required:** LSMC 14.88.630 requires the preparation of a geological assessment for any development proposal within 200 feet of an area designated as geologically hazardous. Geological assessments must contain an analysis of the potential impacts to geologically hazardous areas resulting from the proposed development and identify appropriate mitigation measures necessary to protect development and the geologically hazardous area.
- **Native Growth Protection Area:** LSMC 14.88.670 requires developers to place geologically hazardous areas not approved for alteration and their buffers in a

native growth protection area; lawfully altered geologically hazardous areas are subject to a covenant of notification and indemnification/hold harmless agreement.

- **Erosion Control Measures Required:** LSMC 14.64.130 requires the implementation of sedimentation and erosion control measures for any development that would entail land disturbance. The Public Works Director must review and approve erosion control plans.

Additional Mitigation Measures

Existing regulations provide adequate mitigation for identified impacts. No additional measures are required.

B. Water Resources

Applicable Regulations and Commitments

- **Stormwater Management:** The City's municipal code requires the use of natural drainage systems to the extent feasible in order to preserve natural topography (LSMC 14.64.100). The Code also requires all new stormwater drainage systems to be constructed in accordance with the requirements of the Department of Ecology's 2005 Stormwater Management Manual for Western Washington (LSMC 11.06.020 and LSMC 14.64.140).
- **NPDES Phase II Municipal Stormwater Permit:** The Western Washington Phase II Municipal Stormwater Permit was issued in 2007 to implement the requirements of the Clean Water Act and the National Pollutant Discharge Elimination System as codified in Sections 11.06.020 and 14.64.140 of the City's municipal code. Local jurisdictions covered under the permit, including the City of Lake Stevens, are required to develop a stormwater management program designed to reduce the discharge of pollutants and protect water quality. In accordance with the requirements of the permit, the City of Lake Stevens has adopted a stormwater management plan focused on public education and outreach, detection and elimination of illicit stormwater discharge, controlling runoff generated by new development activities, and prevention of pollution resulting from municipal activities. Continued implementation of the measures contained in the stormwater management program would reduce pollutant loading and improve water quality in the City's lakes, streams and wetlands.
- **Critical Area Regulations:** La**k**e Stevens' adopted critical area regulations, Chapter 14.88 LSMC, protects wetlands and streams by limiting allowed activities and disturbance and establishing buffers of varying size based on wetland or stream classification. Future development will be subject to these regulations, including all applicable protection standards, mitigation requirements and mitigation sequencing procedures. In particular, wetlands mitigation is required to take the form of in-kind

replacement of impacted functions and values wherever possible, and replacement wetlands must adhere to the design requirements of LSMC 14.88.840, including performance standards and mitigation ratios.

Additional Mitigation Measures

- **Stormwater Detention:** For properties adjacent to identified wetlands and their buffers, new development and redevelopment shall not result in an increased rate of runoff from the site to the wetland. To prevent alteration of established wetland hydrologic processes, adopted regulations require that stormwater be either detained or infiltrated on-site.
- **Low Impact Development (LID):** The City has incorporated incentives for the use of LID techniques (Chapter 14.38 LSMC) to encourage use of LID techniques to reduce stormwater impacts.
- **Critical Areas:** More detailed analysis will be required for future projects that occur on sites containing critical areas – including full delineation, classification, and functional assessment – in conjunction with development permitting. The standards and mitigation requirements of Chapter 14.88 LSMC will be applied to such development to avoid or mitigate impacts.
- **Wetland Mitigation Banking.** LSMC 14.88.040 allows the use of credits from a state-approved wetland mitigation bank to compensate for unavoidable impacts to wetlands. Per these regulations, projects using mitigation bank credits must be consistent with the replacement ratios specified in the mitigation bank's certification. If mitigation credits are not available and establishment of a separate mitigation bank is not feasible, the City may encourage preservation and enhancement of wetland-affected areas in exchange for increased development potential in other portions of the site or subarea.

C. Plants & Animals

Applicable Regulations and Commitments

- **Tree Retention:** The City's land use code (LSMC 14.76.120) requires every development to retain existing significant trees and stands of trees that occur on the development site unless such retention would create an unreasonable burden on the developer or create a safety hazard. The code also requires that significant trees removed as part of a development project be replaced, and that retained and replanted trees be protected during construction. Similarly, the code requires retention or planting of trees along dedicated streets (LSMC 14.76.110).

- **Critical Areas Regulations:** Future development in the 20th Street SE Subarea has the potential to adversely affect wildlife and habitat through clearing of vegetated areas. However, the City's critical areas regulations (Chapter 14.88 LSMC) protect wetlands, riparian areas and other critical areas that provide habitat for plants and animals, by limiting the activities allowed within the critical area and establishing appropriate protective buffers and mitigation strategies for unavoidable impacts.

2. Air

A. Air Quality

Mitigation During Construction

Although significant air quality impacts are not anticipated with any of the subarea plan alternatives, construction contractors will be required to comply with all relevant federal, state, and local air quality rules. In addition, implementation of best management practices will also reduce emissions related to the construction phase of future projects. During development review, the City will consider best management practices to minimize potential air quality impacts, including measures for reducing exhaust emissions and fugitive dust. Possible control measures that will be considered include the following:

- Use only equipment and trucks that are maintained in optimal operational condition
- Require all off-road equipment to have emission reduction equipment (e.g., require participation in Puget Sound Region Diesel Solutions, a program designed to reduce air pollution from diesel, by project sponsors and contractors)
- Use bio diesel or other lower-emission fuels for vehicles and equipment
- Use car-pooling or other trip-reduction strategies for construction workers
- Implement restrictions on construction truck and other vehicle idling (e.g., limit idling to a maximum of 5 minutes)
- Spray exposed soil with water or other suppressant to reduce emissions of particulate matter (PM) and deposition of particulate matter
- Pave or use gravel on staging areas and roads that would be exposed for long periods
- Cover all trucks transporting materials, wetting materials in trucks, or providing adequate freeboard (space from the top of the material to the top of the truck bed), to reduce particulate matter (PM) emissions and deposition during transport
- Provide wheel washers to remove particulate matter that would otherwise be carried off site by vehicles to decrease deposition of particulate matter on area roadways
- Remove particulate matter deposited on paved, public roads, sidewalks, and bicycle and pedestrian paths to reduce mud and dust; sweep and wash streets continuously to reduce emissions

- Cover dirt, gravel, and debris piles as needed to reduce dust and wind-blown debris
- Stage construction to minimize overall transportation system congestion and delays to reduce regional emissions of pollutants during construction

Mitigation During Operation

The EIS indicates that the development pursuant to the subarea plan would not result in any significant adverse air quality impacts in the study area. Consequently, no operational impact mitigation measures are warranted or proposed.

B. Greenhouse Gas Emissions (GHG)

Based on the goals and strategies listed in the 20th Street SE Corridor Subarea Plan, the City will consider the following GHG reduction strategies for reducing GHG emissions:

- Adopt green building standards for new development (e.g., Lead in Energy and Environmental Design (LEED) silver or better);
- Although the City is not currently subject to the commute trip reduction requirements of RCW 70.94.527, future development within the subarea may be within the statutory thresholds and may require that the City adopt a commute trip reduction program. Any development meeting the statutory criteria would be subject to this program;
- Expand transit options such as the Community Transit vanpool program or new fixed route bus service; or
- Implement efficient transportation design standards including the use of roundabouts and LED street and area lighting where appropriate.

3. Land Use

Many of the land use changes identified in the EIS – including increased density/intensity and a greater diversification and mix of land uses – are not considered adverse impacts. The change in the subarea's land use pattern, for example, does not require mitigation.

Potential land use conflicts between proximate land uses of different intensity are addressed in proposed subarea development regulations and design guidelines and will be mitigated through project review. For example, height and bulk limits and setback requirements in zoning regulations address potential conflicts between commercial and residential land uses. Landscaping requirements will also help to buffer and screen land uses of dissimilar intensity or scale. Proposed design guidelines provide approaches to site planning and building design that will reduce a range of potential impacts. These techniques are incorporated into subarea development regulations (Chapter 14.38 LSMC) and subarea design guidelines.

4. Population, Housing & Employment

No significant adverse impacts to population, housing or employment have been identified and no mitigation is necessary.

5. Aesthetics

A. Visual Character

- **Development Regulations**: Zoning regulations and design guidelines to implement the subarea plan address appropriate uses, heights, setbacks and similar development parameters. The code also includes incentives, such as bonuses in height or intensity, in exchange for incorporating a menu of public amenities in new development. Standard landscaping standards have been modified to create the desired character for development sites, roads, and sidewalks and trails.
- **Design Guidelines**: Subarea-specific design guidelines will ensure that future development achieves a cohesive visual character and high-quality site planning, building design, lighting and signage.

B. Views

- **Park & Open Space Planning**: The City will update its *Parks & Open Space Plan* to address needs created by planned growth in the 20th Street SE Corridor Subarea. In conjunction with this planning, the City may identify new parks or open space areas that provide views of landscape features, as discussed above, and determine adequate measures that maintain or enhance specified viewpoints. Proposed development regulations also provide incentives to create public spaces in the subarea.

- **Design Guidelines and Standards**: The City may consider adopting guidelines that identify when and how site plans or building design can incorporate elements to minimize impacts to views from parks and other public spaces.

C. Light & Glare

- **Development Regulations**: Proposed subarea lighting requirements (LSMC 14.38.080) will limit lighting intensity, avoid light spillage on adjacent properties, and reduce glare.

6. Cultural Resources

Applicable Regulations and Commitments

- **Chapter 27.53 RCW:** Washington State law prohibits the disturbance, destruction, or removal of historic or prehistoric archaeological deposits without approval from Department of Archaeology and Historic Preservation. Persons who violate the terms of this statue are subject to both criminal and civil liability.

Additional Mitigation Measures

- **Archaeological Survey**: As part of the development review process, the City would require an archaeological survey for properties in the same general vicinity as the known archaeological site, and for properties which display a similar history of logging

activity (e.g., timber harvesting, timber roads, sawmills, etc.), to determine the presence of archaeological or historic resources.

- **Development Agreements:** The City may consider the use of development agreements, per LSMC 14.16C.055, for any properties with known archaeological or historic resources. Such a development agreement could include mitigation measures to protect archaeological resources, such as a memorandum of agreement with DAHP regarding research and curation of artifacts, as well as construction monitoring by a qualified archaeologist.
- **Inadvertent Discovery Plan:** For development proposals on properties that are extensively forested, previously undeveloped, or known to be associated with the historic railroad or historic logging operations, the City would require the preparation of an inadvertent discovery plan to establish protocols for handling archaeological deposits uncovered during construction.

7. Transportation

A. Concurrency

Lake Stevens' adopted concurrency management system, set forth in LSMC 14.110, identifies three options an applicant may select to maintain concurrency when mitigation is required: (1) reducing the size of the development; (2) delaying the development until needed improvements are provided by the City or others; or (3) constructing the needed facilities. Changes may be made to a development proposal to enable it to meet the concurrency requirement, such as by reducing project size, employing transportation demand management to reduce the number of trips generated, or financing the needed improvements. Per the Growth Management Act, concurrency does not apply to highways of statewide significance, such as SR-9.

B. Level of Service Threshold

The City is considering changes to its adopted Levels of Service (LOS) in the 20th Street SE Corridor Subarea. The City's transportation consultant recognized that the citywide LOS standard of "C" would be financially prohibitive within the subarea and recommended that the City revise its standard as part of the subarea plan. To address the subarea's transportation needs, and to help ensure that desired development occurs, the City is considering a system-level LOS standard of "E". However, based on the discretion of the Public Works Director, intersections that are built to their ultimate size would be allowed to operate at LOS F as long as programmatic mitigation measures to reduce trip generation are implemented.

C. Impacted Intersections

The EIS identifies that the following subarea intersections would be deficient, i.e., fall below LOS E during the PM peak hour: 20th Street SE and Cavalero Road; and 20th Street SE and SR-9.

D. Necessary Road Improvements

***20th Street SE and Cavalero Road**:* Add a signal or roundabout to the intersection of 20th Street SE and Cavalero Road. Signalizing the intersection would improve operations to LOS C during the PM peak hour. A roundabout would function at the threshold level of LOS E.

***20th Street SE and 83rd Avenue SE*:** Adding a southbound right turn pocket would improve the intersection's overall LOS to D during the AM peak hour.

20th Street SE and SR-9: This intersection is under the jurisdiction of WSDOT, not the City of Lake Stevens. Any mitigation measures would likely arise as part of the SR-9 Corridor Planning Study (WSDOT, 2011).

***Additional Network Improvements*:** The Subarea Plan and EIS identify additional improvements to the road network that are necessary as a result of growth and which were assumed in the transportation analysis. These include widening of 20th Street SE; construction of a new 24th Street SE, paralleling 20th Street SE, between Cavalero Road and the intersection of SR-9 and South Lake Stevens Road, and construction of a roundabout or installation of a signal at this new intersection; extension of 91st Avenue SE between 20th Street SE and 24th Street SE; and conversion of 79th Avenue SE to a public road between 20th Street SE and 24th Street SE.

E. Impact Fees

The improvements described above require a substantial investment of money to implement (See Appendix C of the 20th Street SE Corridor Subarea Plan). To help address identified impacts, and to generate the funds necessary to implement the mitigation measures described above, the City will adopt a traffic impact fee program (Chapter 14.112 LSMC), as authorized by RCW 82.02.050. This citywide program will establish fees within a traffic impact zone including the 20th Street SE Corridor Subarea.

Given that the majority of the traffic impacts would occur on the state highway system, the City of Lake Stevens could pursue an interlocal agreement with WSDOT. The interlocal agreement would allow the City and WSDOT to share fee revenues and help construct necessary improvements.

F. Transportation Benefit District

Formation of a Transportation Benefit District (TBD), as authorized by RCW 36.73.120, may be used by the City to help finance transportation improvements in conjunction with a traffic impact fee.

G. Transportation Demand Management

Transportation demand management (TDM) strategies include mandatory commute trip reduction (CTR) programs and enhanced transit service. Although the City is not currently subject to the commute trip reduction program requirements of RCW 70.94.527, future development within the subarea may be within the statutory thresholds and may require

that the City adopt a CTR program. Any development meeting the statutory criteria would be subject to this program. Proposed development regulations also include incentives for alternative or high-efficiency transportation modes (LSMC 14.38.050).

8. Public Services

Applicable Regulations & Commitments

All development will be required to comply with adopted development regulations related to emergency access, fire suppression systems, and school and park impact mitigation fees. Subarea development regulations and subarea design guidelines also include incentives that will encourage the provision of public spaces in new development, and address site and building lighting to ensure security.

Additional Mitigation Measures

- During construction, implement security measures such as onsite lighting, fencing, onsite surveillance, etc. to reduce potential criminal activity.
- Begin a planning process to identify additional park space within the subarea. Identify land that is suitable for acquisition, and investigate the potential for acquiring easements within the utility corridor.
- The School District will continue to monitor student generation and capital needs every two years and mitigation fees may be adjusted in the future to reflect identified needs.
- The City should review current level of service standards for police services to ensure that they are consistent with regional standards and with the standards of comparable cities, and that they meet the needs of the City.
- Begin a planning process to identify additional park space within the subarea that will be considered during updates to the Parks and Recreation Element of the Comprehensive Plan. Identify land that is suitable for acquisition, and investigate the potential for acquiring easements within the utility corridor.

9. Utilities

A. Drainage

Applicable Regulations and Commitments

- **Ecology Stormwater Manual:** The City has adopted the *Department of Ecology's 2005 Stormwater Management Manual for Western Washington* as its minimum design standard for stormwater infrastructure. All development meeting the minimum thresholds is required to design associated stormwater infrastructure to be consistent with these standards.

- **City of Lake Stevens Stormwater Ordinance:** Chapter 11.06 and Chapter 14.64 (Part II) of the Lake Stevens Municipal Code adopt the *Department of Ecology's 2005 Stormwater Management Manual for Western Washington*. Any project that meets or exceeds the thresholds defined in the manual for new impervious area, drainage system modifications, or redevelopment is subject to City review and permit approval.
- **Low Impact Development:** The City's stormwater ordinance identifies Low Impact Development (LID) solutions, as defined and listed in the LID Technical Guidance Manual for Puget Sound, that are acceptable and encourages alternative standards for management of stormwater. In addition, subarea development regulations provide an incentive for the use of LID techniques (LSMC 14.38).

B. Water

Applicable Regulations and Commitments

- ***Supply Upgrades*:** Snohomish County PUD's 2011 *Water System Plan* identifies necessary capital improvements to provide adequate water supply for the next 20 years. Planned and budgeted supply improvements include conversion of the system's two emergency groundwater wells to a full-time source, increasing system supply by approximately 1.2 MG per day.
- ***Storage Upgrades*:** The PUD's 2011 *Water System Plan* identifies the following planned and budgeted capital improvements to storage capacity:
    - Walker Hill Booster Zone Intertie: Eliminates dead storage in the Walker Hill tanks, making this water available to the Lake Stevens 500 zone for emergency use. (2012)
    - Getchell Reservoir: New 9.2 MG reservoir serving the Lake Stevens 500 pressure zone.
- **Distribution Upgrades:** The PUD's ongoing water main replacement program annually evaluates aging pipes for replacement with a focus on the replacement of galvanized iron/steel and asbestos cement pipes.

Additional Mitigation Measures

- ***Design Review for Fire Flow*:** The City and developers will coordinate review of development permit applications with the Snohomish County PUD and the Lake Stevens Fire Marshal to determine fire flow requirements based on project type, intensity and design. Upgrades to existing lines will be coordinated with the PUD. Installation of new water lines adequate to provide required fire flows shall be the responsibility of the developer, in accordance with the fire flow design thresholds established below.
    - Commercial, Office, and High-Density Residential**:** 12-inch pipes and 3,000 gpm.

- Existing Medium and Low-Density Residential Areas**:** 8-inch pipes and 1,500 gpm.
- All Other Areas and Development Types**:** 10-inch pipes and 2,000 gpm.

C. Sewer

Applicable Regulations and Commitments

- ***Planned Capital Improvements*****:** The Lake Stevens Sewer District adopted updates to its Comprehensive Plan in 2007 and 2010, describing the capital improvements planned for the near future, including several pipeline expansions, decommissioning of several lift stations, pump upgrades, and construction of a new wastewater treatment plant. These improvements are designed to relieve existing system deficiencies and create the capacity necessary to serve future development. The City will coordinate with the Sewer District to ensure that improvements are implemented as planned and/or reprioritized as necessary to facilitate implementation of the subarea plan.

Additional Mitigation Measures

- ***Joint Planning with Lake Stevens Sewer District*****:** The City and the Lake Stevens Sewer District should establish a joint planning process to identify and implement capital improvements necessary to serve anticipated development in the subarea, including new wastewater collection infrastructure and future expansions to the new treatment plant that may be necessary to accept projected flows from development under the subarea plan.

Appendix B

SR-9 & South Lake Stevens Road Travel Demand Forecast Memo

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FEHR PEERS

MEMORANDUM

Date: June 20, 2012

To: Richard Weinman

From: Ariel Davis and Chris Breiland, Fehr & Peers

Subject: ***SR-9 & South Lake Stevens Road Travel Demand Forecasts***

SE11-0221

This memo supplements the analysis contained in the 20th Street SE Corridor Subarea Plan Draft Environmental Impact Statement (DEIS). This memo is being prepared in support of an air quality conformity analysis at the SR-9/South Lake Stevens Road intersections, as required by state and federal law.

The memo focuses on the intersection of SR-9 and South Lake Stevens Road during three timeframes: the 2015 construction year, the 2025 EIS analysis year, and the 2040 horizon year. The analysis considers two scenarios: the No Action Alternative and the Preferred Alternative, as defined in the Final EIS. The No Action Alternative represents the scenario in which land is developed according to the current zoning regulations in place for the 20th Street SE Corridor Subarea (Alternative 1 in the DEIS). The Preferred Alternative is equivalent to Alternative 2 (Employment and Commercial Emphasis) as described in the DEIS, and would result in the following development levels in the 20th Street SE Corridor under 2025 conditions:

- 450,000 square feet of retail uses
- 1,250,000 square feet of office uses
- 1,000 residential dwelling units

METHODOLOGY

This analysis builds upon the transportation analysis for the 20th Street SE Corridor Subarea Plan DEIS, using the same forecasting methods and traffic operation analysis tools. Details are provided below.

Travel Demand Forecasts

Travel demand forecasts for this analysis were calculated using the existing counts and the 2025 forecasts developed for the DEIS. Note that along SR-9, there are two sets of volumes presented in the DEIS:

1. The demand volumes estimated by the Snohomish County travel model; and
2. A set of reduced northbound volumes, which may be more realistic given the metering effect of the proposed 32nd Street SE roundabout intersection and US-2 interchange to the south. To mirror the DEIS, it is assumed that 1,300 northbound vehicles could pass

through hourly from the intersections to the south, which is the maximum flow under ideal conditions for these types of intersections. These assumptions were discussed with Mike Swiers and Hung Huynh from WSDOT, who generally concurred with the concept of metering traffic volumes from the south.

The analysis contained in the text of this memo is based on the capacity constrained northbound volumes.

2015 Construction Year

It is assumed that volumes would grow linearly from existing conditions to the 2025 analysis year. Therefore, volumes were calculated using linear interpolation between the existing counts (2011) and the 2025 forecasts. Note that this was completed for both the 2025 No Action Alternative presented in the DEIS and the 2025 Preferred Alternative (Alternative 2 in the DEIS and FEIS).

2025 Analysis Year

For the No Action Alternative, the volumes developed for analysis in the DEIS were used. For the Preferred Alternative, the Alternative 2 traffic volume forecasts from the DEIS were used.

2040 Horizon Year

The traffic demand volumes for the No Project conditions were derived based on the population growth forecast by the Puget Sound Regional Council (PSRC) between 2025 and 2040. The PSRC forecasts of population indicate a growth of 21 percent in Snohomish County during that period. This growth rate was applied to all the approaches of the SR-9/South Lake Stevens Road intersection, based on the 2025 No Action Alternative. The exception to this growth rate factoring was the northbound traffic approaching the intersection, which was increased by only 10-20 vehicles per hour to reflect the constrained conditions that limit traffic from the south.

The 2025 DEIS traffic forecasts for the Preferred Alternative did not assume buildout of all the zoned land in the 20th Street SE Corridor. Therefore, 2040 Preferred Alternative forecasts assumed additional land use growth in the corridor, consistent with the 21 percent increase in Snohomish County growth forecast by the PSRC. This additional growth equates to the land use totals below:

- 544,500 square feet of retail uses
- 1,512,500 square feet of office uses
- 1,210 residential dwelling units

The growth in traffic associated with the additional land use was added to the background traffic growth forecasts described for the No Action Alternative.

Traffic Operations

Traffic operations were assessed using the Synchro and SIDRA software packages. Specifically, the No Action Alternative assumes that the roadway configuration at SR-9 and South Lake Stevens Road would remain the same as it exists today. That configuration was analyzed in Synchro. However, under the Preferred Alternative, it is assumed that a roundabout is

constructed at the intersection of SR-9 and South Lake Stevens Road[1]. The roundabout would have two lanes on each approach and a southbound to eastbound slip-lane. This configuration was analyzed using SIDRA.

Level of Service

Level of service (LOS) is assigned based on the delay experienced by vehicles traveling through the intersection. For this memo, two types of intersections were analyzed: an unsignalized side-street stop controlled intersection and a roundabout. For the unsignalized side-street stop controlled intersection (which would be in place under the No Action Alternative), LOS is determined by the movement with the highest delay. For roundabouts (which would occur under the Preferred Alternative), LOS is determined by the average delay experienced by all vehicles. The delay-based LOS thresholds for both types of intersection controls (from the Highway Capacity Manual) are shown below in **Table 1**.

TABLE 1. DEFINTIONS OF INTERSECTION LEVELS OF SERVICE

Level of Service	Delay per Vehicle (in seconds)	
	Unsignalized	Roundabout
A	0-10	0-10
B	>10-15	>10-20
C	>15-25	>20-35
D	>25-35	>35-55
E	>35-50	>55-80
F	>50	>80

Source: Highway Capacity Manual, 2010.

Impact Identification

The information in this memo is provided at the request of WSDOT staff who have expressed an interest in determining how a roundabout would operate at the study intersection. The impact analysis results in the DEIS assumed a traffic signal at this location, which was anticipated to operate at acceptable service levels. The same impact thresholds used in the DEIS apply to this analysis, specifically:

A transportation impact is considered to occur if a subarea plan alternative would:

- Cause a study intersection that operates acceptably under the 2025 or 2040 No Action Alternative (LOS C), to operate unacceptably (LOS D, E, or F);

[1] Based on discussions with WSDOT, a roundabout would likely be the preferred intersection control at this location since it is relatively near the existing signal at 20th Street SE and the department would like to minimize stops along the corridor.

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- Cause a study intersection that operates unacceptably under the 2025 or 2040 No Action Alternative to operate with higher delay;
- Interfere with any existing or planned transit service[2]; or
- Interfere with any existing or planned pedestrian or bicycle facility[3].

ANALYSIS RESULTS

This section summarizes the results of the travel demand forecasting and traffic operations analysis completed for the intersection of SR-9 and South Lake Stevens Road. Note that the results presented here are all based on the capacity constraints imposed by the SR-9/US-2 interchange which would only allow approximately 1,300 northbound vehicles per hour to reach the study intersection. Results for the demand volumes as estimated by the Snohomish County travel model are presented in the appendix of this memo.

No Action Alternative

As described earlier, the No Action Alternative assumes that land use is developed according to current zoning regulations and the study intersection remains as it exists today. This alternative was analyzed for the 2015 construction year, the 2025 DEIS analysis year, and the 2040 horizon year. Volumes for each analysis year (developed as described in the methodology section) are shown in **Figure 1**. Level of service is shown in **Table 2**. Since the existing roadway configuration is a side-street stop controlled intersection for the eastbound approach only, the LOS shown always represents the delay experienced on that leg of the intersection.

TABLE 2. NO ACTION ALTERNATIVE RESULTS

Scenario	Level of Service	Delay in Seconds
2015 Construction Year	D	33.7
2025 DEIS Analysis Year	F	>200
2040 Horizon Year	F	>200

Source: Fehr & Peers, 2012.

The intersection level of service operates at a LOS of D after construction in 2015. The 2025 DEIS Analysis year and the 2040 Horizon year both operate at LOS F, with long side-street delays anticipated.

Preferred Alternative

The Preferred Alternative assumes that the 20th Street SE Corridor has land use development consistent with that described at the beginning of this document. This alternative was also analyzed for the 2015 construction year, the 2025 DEIS analysis year, and the 2040 horizon year. Volumes for each analysis year (developed as described in the methodology section) are shown in **Figure 2**. Level of service is shown in **Table 3**. It is assumed that a two-lane roundabout with a

[2] This includes forcing transit to re-route because of closed streets or relocated bus stops.
[3] This includes forcing pedestrians or bicyclists to alter their routes due to closed facilities.

southbound to westbound slip-lane is constructed at the study intersection under the Preferred Alternative.

TABLE 3. PREFERRED ALTERNATIVE RESULTS

Scenario	Level of Service	Delay in Seconds
2015 Construction Year	A	9.4
2025 DEIS Analysis Year	D	45.6
2040 Horizon Year	E	79.6

Source: Fehr & Peers, 2012.

The roundabout level of service operates with a LOS of A (9.4 seconds) at construction year (2015). The LOS for the 2025 DEIS analysis year is D (45.6 seconds) and the 2040 horizon year operations are expected to be LOS E (79.6 seconds).

Potential Impacts

As shown in Table 3, the construction of the 24th Street SE extension along with a new roundabout at SR-9 would lead to improved traffic conditions at the 24th Street SE/SR-9 intersection when compared to the No Action Alternative. It should be noted that the anticipated LOS under both 2025 and 2040 conditions does not meet the current City of Lake Stevens LOS C standard[4]; however WSDOT's LOS D standard is met under 2025 conditions. Under the long-term 2040 condition, LOS with the proposed roundabout would be E. This LOS could be improved with future long-term improvements, such as a traffic signal or interchange. However, neither WSDOT nor Lake Stevens have land use or transportation plans at this time that look out to 2040 conditions. No impacts to transit, bicycle, or pedestrian travel are anticipated with the construction of the Preferred Alternative.

The 20th Street SE Corridor Subarea Plan DEIS recommended amending the City threshold for signalized intersections in designated centers and mixed use areas, such as the one proposed along the 20th Street SE Corridor, in the City of Lake Stevens Comprehensive Plan to strive for a goal of. LOS E operations during the PM peak hour of travel is common throughout the more active and economically vibrant portions of Puget Sound and represents a balance between providing good access and implementing financially feasible roadway improvements. With this proposed change to the Lake Stevens Comprehensive Plan, there would be no significant adverse impacts to traffic or transportation associated with the development of the Preferred Alternative. The Planning Commission and City Council will be considering adoption of a subarea plan and potential changes to the Comprehensive Plan, including the level of service, over the next several months.

[4] This LOS standard is defined in the City's Comprehensive Plan.