



Public Works

Transportation & Environmental Services

3000 Rockefeller Ave., M/S 607

Everett, WA 98201-4046

(425) 388-3464

www.snoco.org

Dave Somers
County Executive

April 30, 2019

City of Lake Stevens Planning & Community Development
ATTN: Melissa Place, mplace@lakestevenswa.gov
PO Box 527
Lake Stevens, WA 98258-0257

Subject: SEPA MDNS and Notice of Planned Action - LUA2019-0068 and LUA2019-0069

Dear Melissa Place,

Snohomish County Public Works has reviewed the subject Planned Action and SEPA MDNS for the proposal to construct a new road alignment, 24th Street SE. In reviewing the plan, we offer the following comments/recommendations:

The description of the proposal in Section 11 of the checklist states that a new multilane roundabout will be constructed at the intersection of 24th Street SE and SR9 in association with commercial development in the area. The roundabout is not shown on the plan attached to the SEPA checklist so it appears that the roundabout is not part of the proposal for which a MDNS has been issued. However, 24th Street SE and the realignment of South Lake Stevens Road should be designed to accommodate the proposed change in intersection control at SR9. South Lake Stevens Road west of SR9 and the proposed realignment is a County arterial road.

Section 14 of the checklist refers to a Traffic Impact Analysis (TIA) and addendum to the TIA conducted for commercial development of the site north of 24th Street SE. The TIA shows the new intersection of 24th Street SE and South Lake Stevens Road located about 425' from the future roundabout proposed at SR9. The TIA states that 95 percentile queues westbound approaching the intersection would be 225' and that eastbound queues approaching the roundabout at SR9 would be 300'.

The plan attached to the SEPA checklist shows the new intersection of 24th Street SE and South Lake Stevens Road located about 150' to 200' from the future roundabout. This separation is insufficient for the queues identified in the analysis. The intersection should be located where shown on the plan in the TIA.

The TIA only analyzes PM peak hour traffic not AM peak hour traffic. While this is to be expected as the proposed commercial development would not be operational during the AM peak hour, the City's proposal to construct 24th Street SE and realign South Lake Stevens Road should also analyze AM peak hour traffic. A significant volume of traffic uses South Lake Stevens Road west of SR9 to avoid westbound queues on 20th Street SE and southbound queues on SR9 approaching US2.

Design of the roundabout at the intersection of 24th Street SE and SR9 and the realignment of South Lake Stevens Road to intersect with 24th Street SE should include analysis of the anticipated diversion of AM peak

traffic from 20th Street SE to the westbound approach of South Lake Stevens Road to SR9. This AM analysis may have been included in the ICE report prepared for WSDOT but has not been provided for County review.

South Lake Stevens Road and 87th Avenue SE provide an important County arterial route between Lake Stevens and Bickford Avenue as an alternative to SR9. Section 11 of the checklist discusses a South Lake Stevens Road Connector. The realignment of South Lake Stevens Road should be constructed as a through road, as generally shown on the enclosed drawing, to its intersection with 24th Street SE, not with a separate connector road as shown on the plan in the TIA. While the TIA analyzes South Lake Stevens Road east of SR9, it does not analyze impacts of traffic on this route west of SR9 to its intersection with Bickford Avenue. This should be addressed in an addendum to the TIA and used to inform design. Design of the realignment should be done in cooperation with Snohomish County Public Works.

We also noted from review of the TIA that the proposed commercial development proposes a roundabout as mitigation at the intersection of the westbound SR2 off-ramp and Bunk Foss Road. Bunk Foss Road is a County road where AM peak hour capacity is limited. Though not part of this proposal we bring this to the City's attention as design of intersection improvements at this location will need to be done in cooperation with Snohomish County Public Works.

Should you have any questions, please contact Mohammad Uddin at 425-388-3099.

Sincerely,



Douglas W. McCormick, P.E.
Snohomish County Engineer

cc: Stephen Dickson, PW Transportation and Environmental Services Director
Mohammad Uddin, PW Traffic Operations Engineering Manager/Traffic Engineer
Randy Blair, PW Special Project Manager
Brook Chesterfield, PW Special Projects Coordinator

20TH ST SE

SR 9

SR 9

SR 9

PARCEL NO.
00473400000400

91ST AVE SE

PARCEL NO.
00457000000200

PARCEL NO.
00457000000300

93RD AVE SE

PARCEL NO.
00457000000500

100'

PARCEL NO.
00457000000400

100'

PARCEL NO.
00457000000700

214.00'

PARCEL NO.
00457000000600

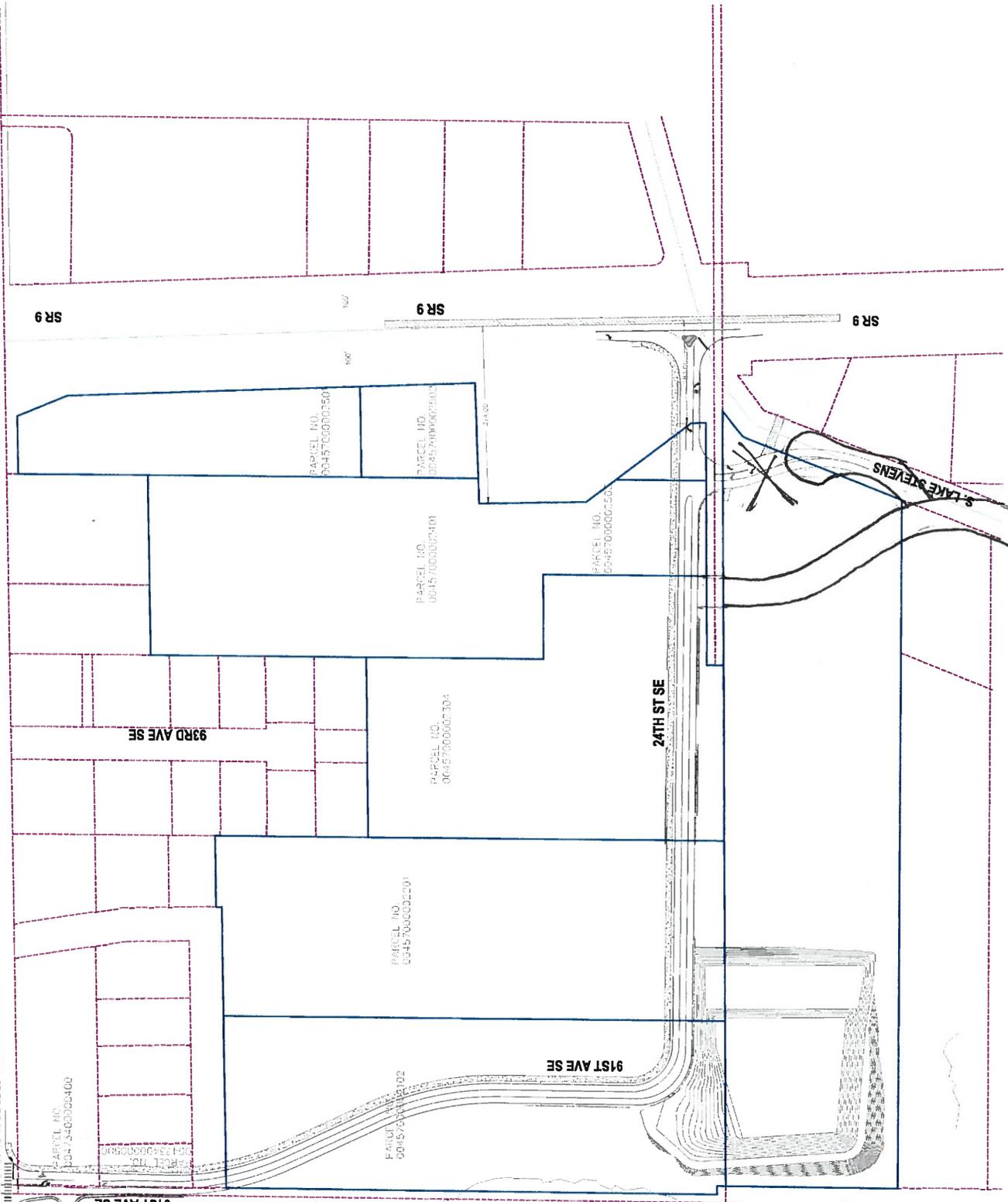
91ST AVE SE

PARCEL NO.
00457000000200

PARCEL NO.
00457000000300

24TH ST SE

S LAKE EVENS





STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

*Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000
711 for Washington Relay Service • Persons with a speech disability can call (877) 833-6341*

May 6, 2019

Melissa Place
Lake Stevens City Hall
PO Box 257
Lake Stevens, WA 98258

**Re: 24th St. SE Road Project, West of SR 9 & Lake Stevens Rd.
LUA2019-0069, Ecology SEPA #201902179**

Dear Melissa Place:

Thank you for the opportunity to provide comments on the 24th St. SE Road Project. Based on review of the State Environmental Policy Act (SEPA) checklist associated with this Project, the Department of Ecology (Ecology) has the following comments:

The wetlands delineated on this property would be considered waters of the state subject to the applicable requirements of state law (see RCW 90.48 and WAC 173.201A) and possibly require a permit under Section 401 of the Clean Water Act (33 USC §1341) and 40 CFR Section 121.2. Because direct wetland impacts are proposed, the applicant shall obtain all necessary state and federal authorizations prior to beginning any ground-disturbing activities or vegetation removal. To obtain state and federal authorization, take the following steps:

- Contact the U.S. Army Corps of Engineers (Corps) for a jurisdictional determination of whether the wetlands on the property are under federal jurisdiction.
- Contact Ecology for any non-jurisdictional wetlands over which the Corps does not regulate.
- Submit a Joint Aquatic Resource Permit Application (JARPA) form for wetland impacts to Ecology at ecyrefedpermits@ecy.wa.gov
- Submit a mitigation plan for unavoidable wetland impacts following the standards in Wetland Mitigation in Washington State – Part 1: Agency Policies and Guidance (Ecology Publication #06-06-011a).

For more information about SEPA and Ecology, please visit <https://ecology.wa.gov/regulations-permits/SEPA-environmental-review>.

Thank you for considering these comments from Ecology. If you have any questions regarding these comments, please contact Doug Gresham with the Shorelands and Environmental Assistance Program at (425) 649-7199 or by email at doug.gresham@ecy.wa.gov.

Melissa Place
May 6, 2019
Page 2

Sincerely,



Amelia Petersen, Backup SEPA Coordinator

Sent by email: Melissa Place, mlace@lakestevenswa.gov

E-cc: Doug Gresham, Ecology
Aaron Halverson, City of Lake Stevens Public Works Department - Applicant



6406 Marine DR NW
Tulalip, WA 98271
360-716-4214

May 6, 2019

Melissa Place
Senior Planner
City of Lake Stevens

On behalf of The Tulalip Tribes we thank you for the opportunity to provide comments on this project and future proposals. We look forward to future correspondence and communication. These comments pertain to the 24th St SE, 91st Ave SE Road Extension, S. Lake Stevens Road Connector and Costco Projects, parcel numbers 00457000002102, 00457000002201, 00457000002304, 00473400000400, 00457000002401, and 00457000002503.

The Tulalip Tribes reserved the right to take fish in their usual and accustomed fishing places pursuant to the Treaty of Point Elliot of January 22, 1855 (12 Stat. 927). The Tulalip Tribes are co-managers of fisheries and fish habitat with the State of Washington. Water of appropriate quality and quantity to support habitat for maintaining and enhancing fish runs is essential to the Tribes' treaty fishing rights. Mistyping streams and filling of wetlands affect fish habitat, water quantity and water quality impairs habitat and results in a reduction in tribal treaty resources.

After reviewing the critical areas reports for the proposed project there is misidentification of critical areas that exist on site. A tributary to Mosher Creek exists, but was not identified in both critical area reports. This type (F) fish bearing stream exists through the center of the parcels (see attached aerial and LiDAR maps). This stream would require 100 foot buffers according to Lake Stevens Municipal Code 14.88.430. Missing this important habitat feature, is a significant error and requires further assessment to the anticipated environmental impacts on the site, and how the site should be developed if at all.

The stormwater information for the Costco development is insufficient in that there is no geologic information provided and no indication that low impact development or green infrastructure were considered for the project. The project applies a conventional detention/retention pond that concentrates and collects all water from a soon-to-be completely impervious site (rooftop and

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parking lot). It appears that the project will prevent any infiltration of rainwater for groundwater and summer base flows for Mosher Creek and the nearby natural wetlands. The quality of treated stormwater that emerges from the stormwater pond will be much lower in quality than if it was infiltrated, conveyed through forest conditions, or treated in by green infrastructure (i.e., pervious concrete, constructed wetlands, etc.). The development in the basin has reached a threshold to where the addition of more impervious surface will further impair water quality and significantly degrade stream habitat conditions...

The City of Lake Stevens appears to be acting as an agent to implement the development of a warehouse store to be developed in the same vicinity as the road improvements. The project should go through one SEPA review for the cumulative impacts on the environment. Rather the project going through separate piecemeal proposals that look at developmental impacts after previous degradation.

There is no Army Corps of Engineers permit mentioned in the application of the project. The wetlands proposed to be filled have connections to waters of the United States. This is a federal nexus giving the Army Corps of Engineers jurisdiction for a wetland fill permitting.

A total of three critical area/delineation reports were done for the area these projects are located. The first report done by Altmann-Oliver Associates, LLC completed in 2012 identified 9 wetlands listed as A-I. The following reports done by The Watershed Company and Sewall Wetland Consulting, Inc. both delineated 6 wetlands. We identify that wetlands conditions do change over time, but would like further investigation of these discrepancies between delineations. It was identified in both Sewall and Watershed Company reports that wetland I of the Altmann report did not meet wetland criteria. There was no discussion of declassifying two more wetlands from the Altmann report. It is obviously unclear what wetlands will be used for the final site/ critical area plan.

It is very important to first avoid environmental impacts at all cost in determining options for this development proposal. The effort to avoid environmental impacts is questionable in this development proposal. If avoidance cannot be achieved then minimizing environmental impacts should be



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prioritized. There was no discussion in the development application that addressed avoidance and minimization options on the environmental resources.

Mosher Creek is not only occupied by cutthroat trout; the only species noted in the wetland reports, but also by Coho Salmon and brook lamprey, both of which have been observed in Mosher Creek and the tributary to Mosher Creek adjacent the project. Coho salmon populations in the Snohomish basin have been trending down for the last several years. Development pressure, habitat degradation and degraded water quality are all to blame.

At least six wetlands were identified on site. Wetlands provide important water quality functions and contribute to stream flow. Allowing the filling of 1.87 acres of wetlands is unacceptable along with mitigating at a mitigation bank in another portion of the Snohomish Basin. The proposed habitat impacts on the site combined with mitigating off site is likely to result in water quality and quantity impairment within Mosher Creek. The additions to impervious surface area reduces infiltration and contributes to increased runoff and risks to channel erosion, the loss of salmon habitat and the introduction of pollutants to the hydrologic system of Mosher Creek. The area under this proposal lies within the headwaters of Mosher Creek. The loss of forest cover, 1.87 acres of wetland, the addition of impervious area, and storm water runoff, all present a significant threat to the health of Mosher Creek and to the salmonid resources present. The Tulalip Tribes consider the potential loss of habitat and reduction in salmonid production as a take of tribal treaty resources. The Tulalip Tribes object to this project as proposed and would strongly recommend revisiting all phases of habitat protection including avoiding (not building in this area), minimizing (much reduced wetland fill) and mitigating (mitigation on site not at a bank).

Sincerely,

Zach Lamebull

Ecologist

The Tulalip Tribes

(360) 716-4620

Kurt Nelson

Environmental Division Manager

Aerial Photo Map for 91st/24th/Costco Development Projects

20th St SE

Legend

- Type F Waters
- Type F Ponds /Wetlands

Mosher Creek

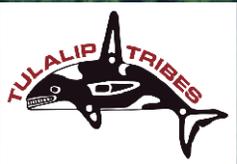
T29R05E
25

Presumed Fish Habitat

SR 9

Unnamed Trib to Mosher Creek

Unnamed Trib to Mosher Creek



This map is a product of Tulalip Tribes Natural Resources Department and is provided "as is" and makes no claim as to the accuracy, completeness, or content of any data contained herein without warranty or inference to warranty of any kind, either expressed or implied. All warranties of fitness for a particular purpose and of merchantability are hereby disclaimed.

2

0 250 500 Feet

LIDAR Hillshade Relative Elevation Map for 91st/24th/Costco Development Projects

20th St SE

Legend

- Type F Waters
- Type F Ponds /Wetlands

Mosher Creek

T29R05E
25

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2





Natural Resources Department
Environmental Division
6406 Marine DR NW
Tulalip, WA 98271

June 3, 2019

Melissa Place, Senior Planner
City of Lake Stevens | Planning & Community Development
1812 Main Street | PO Box 257
Lake Stevens, WA 98258-0257

Subject: Lake Stevens Meeting on the 24th St. and Costco Project (5/30/2019)

Ms. Place,

With this letter I wanted to document what Tulalip staff mentioned at the meeting and heard from Lake Steven's staff in regard to the referenced project.

Tulalip staff emphasized that water quality and quantity to Mosher Creek needs to be maintained and that our concerns involve potential impacts to fish and fish habitat in the stream system. Continued high intensity development like what was discussed, if not avoided, minimized or mitigated will substantially impair fish production in Mosher Creek.

Project and Site Discussions:

Tulalip heard Costco will look into LID, but it may not be feasible because of conditions. The Costco development will be a cut and fill, cutting the north side down and filling the south side, making infiltration not practical (stated by Lake Steven's engineer). The north side retaining wall will be about 20 feet high. WSDOT stormwater pond collects runoff from Highway 9 and releases it to Centennial Creek to the east. The 24th St. cross-sectional profile was narrowed as much as possible to reduce impacts. Site constraints are present to the north with a waterline and to the south from a powerline (PSE or BPA). The regional stormwater pond is under redesign. It collects water from the Costco site to 20th Street. Stormwater will be treated on the Costco Site and within the pond. The pond will be open bottomed for infiltration.

Tulalip Recommendations:

- Tulalip staff suggested minor alignment to 24th may reduce wetland impacts. Lake Stevens Public Works staff said that was not an option.

The Tulalip Tribes are federally recognized successors in the interest to the Snohomish, Snoqualmie, Skykomish, and other allied tribes and bands signatory to the Treaty of Point Elliott.



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360-716-4617

- From Tulalip's perspective the planned projects appeared to be done in piecemeal and not assessed cumulatively. Part of the project was approved in 2011 as part of an EIS. Costco and 24th were added more recently.
- Tulalip mentioned that a forest practice application was needed for clearing the site.
- The stormwater pond should release water to the east and west to feed both the tributary wetlands and Mosher Creek.
- Infiltration on-site if possible, in order to continue to feed wetlands to the south.
- Reorienting the connector to South Lake Stevens Road to reduce wetland impacts.
- Possibly building a parking garage on site to reduce area affected.
- Development of a mitigation package that maximizes mitigation on site including the mitigation idea proposed by consultants – removing a berm between the wetlands. That mitigation appears to be roughly 0.6 acres or less. Replacement or removal of 4 culverts in the tributary stream south of the project site. Consultants from Costco will evaluate this suggestion. This action will provide fish access and functional lift to the wetland complex. Some off-site mitigation to complete mitigation requirements.

Lake Stevens will provide Tulalip the following documents

The geotechnical reports
Alternatives Analysis
EIS if possible
Stormwater drawings for the project area (i.e. Costco, 91st and 24th)
BiOp on Costco and 24th St.

After thoughts

After further review of liDAR and until we see boring information, we think it is highly likely with a 20 ft. plus cut in the north end of the Costco site, grading will expose groundwater, which will also need to be planned for.

Tulalip is still unclear how buffer losses to the wetlands will be mitigated – will this be addressed in the BiOp?



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Tulalip still believes wetland impacts from 24th could be reduced with some reorientation of 24th along with the South Lake Stevens connector. This will hopefully be discussed in the alternatives analysis.

Sincerely,
The Tulalip Tribes

A handwritten signature in black ink that reads "Kurt Nelson".

Kurt Nelson
Environmental Division Manager



Natural Resources Department
Environmental Division
6406 Marine DR NW
Tulalip, WA 98271

June 12, 2019

Melissa Place, Senior Planner
City of Lake Stevens | Planning & Community Development
1812 Main Street | PO Box 257
Lake Stevens, WA 98258-0257

Subject: Lake Stevens Meeting on the 24th St. and Costco Project (5/30/2019)

Ms. Place,

To follow-up on our last letter, staff from the Tulalip Tribes reviewed portion of the following geotechnical reports:

Terracon Consultants Inc. Draft Geotechnical Engineering Report Costco Wholesale CW#17-0230, date May 2018
HWA Geosciences Inc. Draft Geotechnical Report, 24th Street SE and 91st Avenue SE Extensions, dated April 2019

Our review focused on subsurface geology and groundwater levels encountered on the planned Costco and adjacent roads and how the projects may alter and effect groundwater that feeds the wetlands directly south of the project site.

Fueling Facility Concerns

In reviewing the Terracon geotechnical engineering report, the project description (Page 2), mentions below grade structures that includes a fueling facility. Based on the groundwater elevations encountered, these UST's will be well below groundwater levels identified on the site. Concerns include long term risks to contaminating groundwater and interrupting groundwater flow and reduced contributions to wetland to the south of the site. The project description also mentions portions of the site on the north side will be reserved for future expansion. This indicates to us there is some flexibility on how the site is designed allowing for potential redesigns that reduce wetland and groundwater impacts.

Page 20. Below Grade Structures. *“Terrecon did not conduct a groundwater study of sufficient scope or duration to estimate seasonal groundwater level fluctuations or predict how mass grading will affect groundwater regime at the UST location.”* This investigation needs to be performed in order to determine the

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groundwater levels and quantities to expect, how it will be directed, treated, and how contamination will be avoided.

Groundwater Concerns

It appears to us that many of the borings may have ended in advance outwash as opposed to glacial till as suggested in the Terracon report. Advanced outwash is commonly water bearing. Advanced outwash is mentioned in and is shown on Figure 3 in the HWA Geosciences report. Many of the borings terminate at depths in the advance outwash. The nature of the subsurface geology, surficial features shown on LiDAR and the high ground water table at a 300 – 320 ft. elevation suggests that the existing groundwater at the site may not be perched as indicated in this report, but may be indicative of a shallow groundwater table that receives water from a much broader area to the north. In other words, the amount of groundwater in the east half of the site maybe more substantial then indicated in these reports. This groundwater is also the source of water for the wetlands to the south of the project, and possibly Centennial Creek to the east.

Page 5. Groundwater observations from test pits dug in 2015 should not be used because of the unusual nature of the precipitation amounts that year.

The base or footing of retaining walls associated with the Costco site and 24th Street are likely to be in groundwater, the groundwater investigation mentioned previously should also evaluate planned retaining walls and how they will not contaminate groundwater and allow groundwater flow to the south. Otherwise these structures have the potential to significantly alter wetland conditions south of the proposed project.

There does not appear to be any geotechnical investigation or summary of conditions associated with the proposed South Lake Stevens connector, yet it is included in this project. Are there designs or information that forms the basis of the design?

Has the City of Everett been contacted in regard to the construction associated with protecting the water transmission lines crossed by 91st Ave SE? Altering existing conditions around a 90 year old transmission line should be a serious concern.

Sincerely,
The Tulalip Tribes

Kurt Nelson
Environmental Division Manager



Snohomish County

Public Works
Transportation & Environmental Services

3000 Rockefeller Ave., M/S 607
Everett, WA 98201-4046
(425) 388-3464
www.snoco.org

Dave Somers
County Executive

6/19/2019

City of Lake Stevens Planning & Community Development
ATTN: Melissa Place, mplace@lakestevenswa.gov
PO Box 527
Lake Stevens, WA 98258-0257

Subject: Notice of Application LUA2019-0080, LUA2019-0081 and LUA2019-0082

To whom it may concern:

This comment is provided in response to the Notice of Land Use Applications for Costco LUA2019-0080, LUA2019-0081 and LUA2019-0082, issued by the City of Lake Stevens on June 5, 2019.

The County submitted a comment letter to the City of Lake Stevens on April 30, 2019, in response to the SEPA MDNS and Notice of Planned Action – LUA2019-0068 and LUA2019-0069 and in that letter identified deficiencies in the Traffic Impact Analysis (TIA) prepared for the Costco Wholesale and referred to in Section 14 of the checklist (copy of letter attached). The TIA does not address the traffic impacts that would occur on South Lake Stevens Road west of SR9 and 87th Avenue SE to its intersection with Bickford.

In order for the Costco Wholesale development proposal to qualify as a planned action under the 20th Street SE Corridor Subarea EIS adopted via Ordinance No. 878 and for a Planned Action Certification to be issued, the EIS prepared for the 20th Street SE Corridor Sub Area Plan would need to have addressed the impacts of a facility as extensive as a Costco Wholesale located in the southwest quadrant of the 20th Street SE/SR9 intersection. There are few retail facilities of the size of and having the traffic generation of a Costco Wholesale. Even though the 799 new PM peak hour trips may be within the threshold of the EIS, did the EIS adequately address the impact of these trips on County arterials south of the project site? The traffic analysis prepared separately for the Costco Wholesale does not and we were unable to find the traffic analysis for the 20th Street SE Corridor Subarea EIS on the City's website. The City proposes to realign the north end of the South Lake Stevens Road county arterial so that it shares a common traffic signal with an entrance to the Costco Wholesale and yet the analysis distributes no traffic to this arterial road. Traffic accessing the Costco Wholesale can be expected to use this route due to the significant congestion that occurs on northbound SR9 in the vicinity of US2 during the PM peak hour.

Page 50 of the 20th Street SE Corridor Subarea Plan adopted September 24, 2012 states: "The Planned Action Ordinance identifies the criteria that a project must satisfy to be considered as a planned action. These criteria relate to the type of land use proposed, whether its impacts have been addressed in the EIS, and whether mitigation measures are sufficient." The Costco TIA dated October 26, 2018, and addendum dated March 12, 2019, do not address the impacts of traffic that will be distributed to the arterial network that is South Lake Stevens Road west of SR9 and 87th Avenue SE to its intersection with Bickford Avenue. The traffic analysis is clearly deficient. The County requests that an addendum be prepared so that it can be determined whether or not significant adverse impacts exist on the County arterial transportation network that are not addressed in the planned action EIS and for which mitigation measures may not be provided. This analysis under SEPA is necessary despite the lack of a reciprocal mitigation Interlocal agreement between the County and City.

We look forward to further coordination between the City and the County regarding this project.

Sincerely,



Steven Thomsen, P.E., Director
Snohomish County Public Works

Enclosures
4/30/2019 Snohomish County Public Works SEPA DNS Response Letter

April 30, 2019

City of Lake Stevens Planning & Community Development
ATTN: Melissa Place, mplace@lakestevenswa.gov
PO Box 527
Lake Stevens, WA 98258-0257

Subject: SEPA MDNS and Notice of Planned Action - LUA2019-0068 and LUA2019-0069

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traffic from 20th Street SE to the westbound approach of South Lake Stevens Road to SR9. This AM analysis may have been included in the ICE report prepared for WSDOT but has not been provided for County review.

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Should you have any questions, please contact Mohammad Uddin at 425-388-3099.

Sincerely,



Douglas W. McCormick, P.E.
Snohomish County Engineer

cc: Stephen Dickson, PW Transportation and Environmental Services Director
Mohammad Uddin, PW Traffic Operations Engineering Manager/Traffic Engineer
Randy Blair, PW Special Project Manager
Brook Chesterfield, PW Special Projects Coordinator

20TH ST SE

SR 9

SR 9

SR 9

PARCEL NO.
00457000032001

91ST AVE SE

PARCEL NO.
00457000033011

PARCEL NO.
00473400000400

PARCEL NO.
00473400000500

PARCEL NO.
00457000031002

PARCEL NO.
00457000022001

PARCEL NO.
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PARCEL NO.
00457000003501

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00457000003601

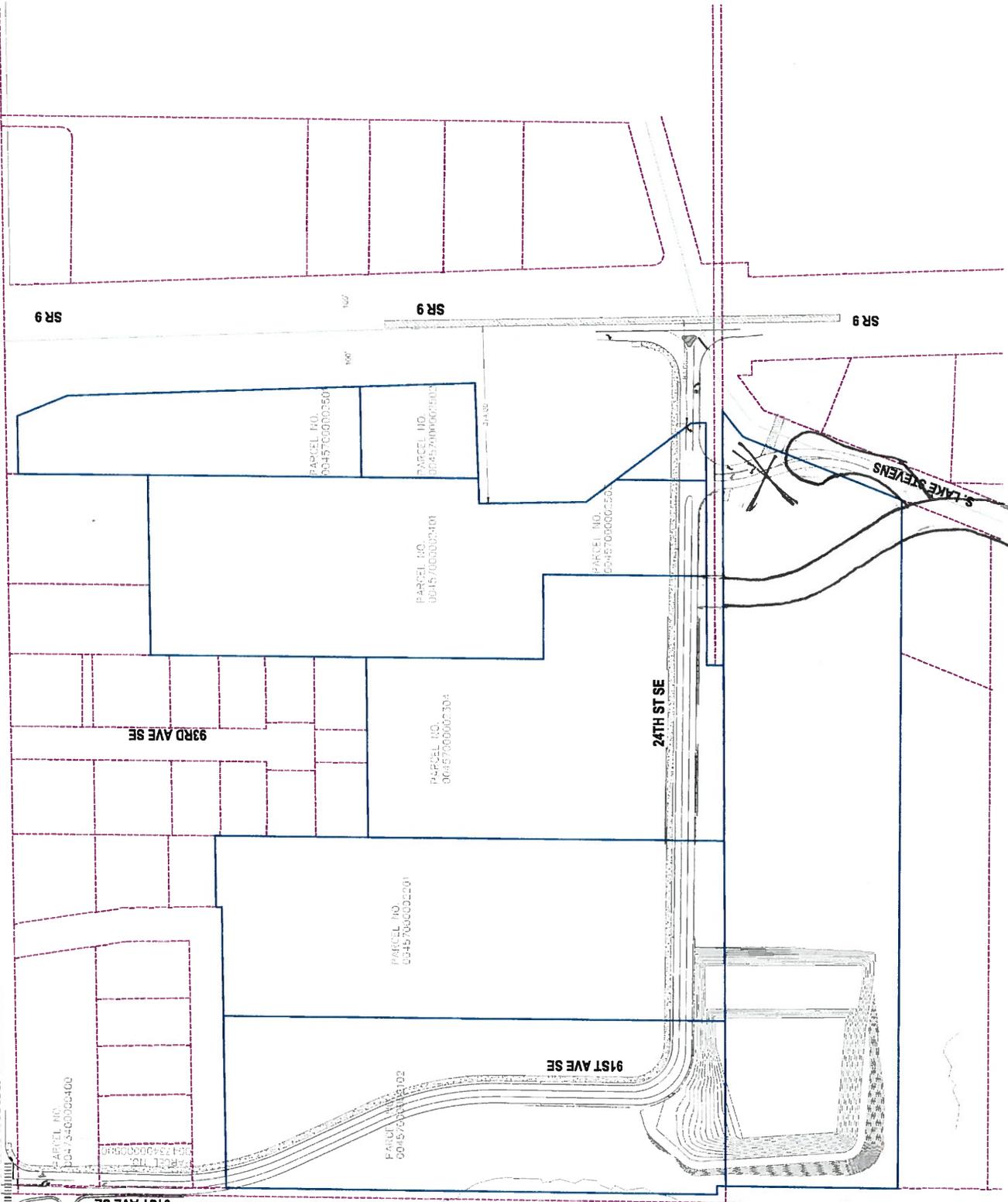
PARCEL NO.
00457000005001

24TH ST SE

91ST AVE SE

93RD AVE SE

S LAKE EVENS





June 19, 2019

City of Lake Stevens – City Hall
Attn: Melissa Place
P.O. Box 257
Lake Stevens, WA 98258
VIA EMAIL

RE: Costco / LUA2019-0080, LUA2019-0081 and LUA2019-0082

Dear Ms. Place,

The City of Everett's Water Transmission Line North Corridor is crossed by the proposed 91st Ave SE roadway accessing the northwest corner of the Costco site.

Three 4-foot diameter water transmission lines are located within this corridor. Everett's water transmission line system supplies water to the majority of Snohomish County including over 600,000 people. Any proposed design of the road prism crossing the transmission lines should be reviewed and approved by the City of Everett prior to construction.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Grant Moen', written over a faint circular stamp.

Grant Moen, P.E.
Maintenance Superintendent
Everett Public Works Department

PUBLIC WORKS

 3200 Cedar Street
Everett, WA 98201

 425.257.8800
425.257.8882 fax

 everettpw@everettwa.gov
everettwa.gov/pw

From: [Dickson, Stephen](#)
To: [Grace Kane](#); [Melissa Place](#)
Cc: [McCormick, Douglas](#); [Uddin, Mohammad](#)
Subject: FW: Notice of Application - Costco Binding Site Plan LUA2019-0156
Date: Tuesday, October 1, 2019 10:16:19 AM
Attachments: [image001.png](#)
[LUA2019-0156 NOA Publication.pdf](#)

Grace and Melissa

We have received the attached binding site plan for review and comment. The tracts depicted do not address the County's concerns about the new alignment of South Lake Stevens Road, in particular the elimination of the proposed T intersection south of the existing South Lake Stevens Road/SR9 intersection. We understood from the City that you would be contacting us to develop a solution before proceeding with plans to change this road network. However, with this application the City seems to be proceeding with its original plan with no further collaboration. Please advise us how the City plans to proceed.

Thank you.

Steve Dickson | Director
Transportation and
Environmental Services

 **Snohomish County**
Department of Public Works
3000 Rockefeller Avenue M/S 607
Everett, Washington 98201

Phone (425) 388-6442
FAX (425) 388-6449
email steve.dickson@snoco.org
WEB www.snoco.org

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From: Fleming, Shannon
Sent: Tuesday, October 1, 2019 9:09 AM
To: Barrett, Clarissa <clarissa.barrett@snoco.org>
Cc: Dickson, Stephen <Stephen.Dickson@co.snohomish.wa.us>
Subject: FW: Notice of Application - Costco Binding Site Plan LUA2019-0156

Comment period ends **10/15**.

Shannon Fleming | *Secretary*
[Snohomish County Public Works](#) | Transportation and Environmental Services
3000 Rockefeller Ave., M/S 607 | Everett, WA 98201
425-388-6406 | 425-388-6449 | shannon.fleming@snoco.org

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From: Melissa Place [<mailto:mplace@lakestevenswa.gov>]
Sent: Tuesday, October 01, 2019 8:54 AM
To: Jennie Fenrich <jfenrich@lakestevenswa.gov>
Subject: Notice of Application - Costco Binding Site Plan LUA2019-0156

CAUTION : This email originated from outside of this organization. Please exercise caution with links and attachments.

Good morning, you are receiving this email as you are on the interested persons list for the Costco project. Please find attached a Notice of Application for a binding site plan for Costco in Lake Stevens. The comment period ends on October 15, 2019.

Thanks, Melissa

Melissa Place, *Senior Planner*
City of Lake Stevens | Planning & Community Development
1812 Main Street | PO Box 257
Lake Stevens, WA 98258-0257
425.622.9433 | mplace@lakestevenswa.gov

NOTICE: All emails and attachments sent to and from City of Lake Stevens are public records and may be subject to disclosure pursuant to the Public Records Act (RCW 42.56).

My regular hours are Monday, Tuesday, and Thursday, 8:00 am to 5:00 p.m. I am not in the office on Wednesdays and Fridays. I will review your email upon my return. If you need immediate assistance, please contact jfenrich@lakestevenswa.gov or call 425-622-9430.

From: [Fleming, Shannon](#)
To: [Melissa Place](#); [Jennie Fenrich](#)
Cc: [Dickson, Stephen](#); [Uddin, Mohammad](#)
Subject: RE: Notice of Public Hearing and Notice of Application for DA - Costco
Date: Friday, November 15, 2019 3:28:46 PM

Good afternoon Melissa,

We have been looking through the documents related to this project - LUA2019-0080, LUA2019-0081, LUA2019-0082, LUA2019-00156, and LUA2019-0178 – and we have located one document that addressed public comments.

The County has sent comment letters on 3 separate occasions – May 1, 2019 in response to LUA2019-0068 and LUA2019-0069; June 19, 2019 in response to LUA2019-0080, LUA2019-0081 and LUA2019-0082; and October 15, 2019 in response to LUA2019-156 & LUA2019-159.

We were not able to find any response to these comments. The County needs to review the City's responses prior to the end of the 14 day comment period, which ends on November 20, and prior to the schedule hearing. If the City has not prepared a response to the County's comments please explain why this has not occurred. The County needs this response to fully evaluate the project and the potential impacts within the County.

Please let me know when the comments from Snohomish County will be addressed when you have a chance.

Sincerely,

Shannon Fleming | *Secretary*

[Snohomish County Public Works](#) | Transportation and Environmental Services

3000 Rockefeller Ave., M/S 607 | Everett, WA 98201

425-388-6406 | 425-388-6449 | shannon.fleming@snoco.org

NOTICE: All emails and attachments sent to and from Snohomish County are public records and may be subject to disclosure pursuant to the Public Records Act (RCW 42.56).

From: Melissa Place [mailto:mplace@lakestevenswa.gov]

Sent: Tuesday, November 05, 2019 4:37 PM

To: Jennie Fenrich <jfenrich@lakestevenswa.gov>

Subject: Notice of Public Hearing and Notice of Application for DA - Costco

CAUTION : This email originated from outside of this organization. Please exercise caution with links and attachments.

Good afternoon, you are receiving this email as you are on the parties of record or interested party list for the Costco project. Please find attached a Notice of Public Hearing and Notice of Application for a Development Agreement for Costco in Lake Stevens. The public hearing is to be held on November 26th at 7:00 pm before the Lake Stevens City Council. More details are included in the

notice.

Thanks, Melissa

Melissa Place, *Senior Planner*
City of Lake Stevens | Planning & Community Development
1812 Main Street | PO Box 257
Lake Stevens, WA 98258-0257
425.622.9433 | mpplace@lakestevenswa.gov

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My regular hours are Monday, Tuesday, and Thursday, 8:00 am to 5:00 p.m. I am not in the office on Wednesdays and Fridays. I will review your email upon my return. If you need immediate assistance, please contact jfenrich@lakestevenswa.gov or call 425-622-9430.



Public Works Department

1812 Main Street
P.O. Box 257
Lake Stevens, WA 98258

November 19, 2019

Douglas W. McCormick, P.E.
Snohomish County Engineer
3000 Rockefeller Ave., M/S 607
Everett, WA 98201-4046

RE: Snohomish County comments on Costco project

Dear Mr. McCormick,

Thank you for taking the time to comment. This is to acknowledge the receipt of your comment letters on the above referenced project, dated 04/30/2019, 06/19/2019 and 10/14/2019.

The following has since been provided to Snohomish County for clarification:

- *SR-9, MP 13.80, 24th St SE/ South Lake Stevens Road Intersection Control Evaluation (ICE)*, by Transportation Solutions, Inc. (TSI) dated October 2018.
- *Costco Lake Stevens Final Traffic Impact Analysis (TIA)*, by TSI dated October 26, 2018.
- *Costco Lake Stevens Traffic Impact Analysis Simulation Analysis Findings Technical Memorandum*, by Transportation Solutions, Inc dated March 12, 2019, revised August 12, 2019.
- *Costco Lake Stevens No Connection from 24th Street SE to S Lake Stevens Road Technical Memorandum*, by Transportation Solutions, Inc dated September 9, 2019.

Snohomish County concerns regarding intersection spacings were analyzed and addressed in the above reports and memos.

WSDOT is the lead agency for the design and construction of the SR9/24th St SE roundabout. The intersection spacings along 24th St SE and the roundabout were designed based on TSI's Traffic Impact Analysis.

At the request of Snohomish County, Lake Stevens revised the previously C-curve to an S-Curve for the section of South Lake Stevens Road and its connection with 24th St SE. It is our understanding that the City of Lake Stevens would need to apply for a Type D permit for work outside of Lake Stevens City limits.

Snohomish County requested additional AM peak hour analysis. In accordance with Lake Stevens Municipal Code Section 14.112.080(b), the evaluation of traffic impacts and mitigation fees is limited to PM peak only.

- (8) *The number of weekday afternoon (PM) peak hour trips likely generated by existing land uses and future land uses (i.e., new development) are estimated based on current land use data and the adopted GMA Comprehensive Plan future land use map. The total existing and new trips are aggregated into the traffic impact zones.*
- (9) *The maximum impact fee that can legally be charged to new development for each new weekday PM peak hour trip generated equals the cost basis of the impact fee divided by the new weekday PM peak hour trips for each traffic impact zone.*

Furthermore, the proposed commercial development would not be operational during the AM peak hour. Thus, no additional AM analysis was conducted.

Travel demand forecasts for all future scenarios were generated by the Snohomish County Travel demand model (EMME) and the US2/SR204 IJR dynamic Traffic assignment (DYNAMEQ) model. The model provided to TSI did not include SR 9 and 87th Ave SE.

As to your comments on the SEPA review the City issued a draft Environmental Impact Statement for the 20th Street SE Corridor on January 24, 2012 that set the scoping for the project, which included a significant section on transportation under the alternatives reviewed. Snohomish County was notified of the City's planning efforts at that time and received no comments. A final Environmental Impact Statement was issued on July 31, 2012. A Planned Action Ordinance (Ordinance 878) was adopted with the plan on September 24, 2012 setting the regulations for future SEPA review.

In regards to the procedural questions posed by the County's letters, the City of Lake Stevens has prepared a summary response to public comments by topic, including procedural and traffic responses. This document is enclosed for your reference and is also available on the city's website at the following link: <https://www.lakestevenswa.gov/380/Current-Planning>

If you have any further questions or need additional information, please feel free to contact me at 425-622-9445 or by e-mail at gkane@lakestevenswa.gov.

Sincerely,



Grace Kane, PE
Senior Engineer

Cc: Stephen Dickson
Mohammad Uddin
Eric Durpos
Russell Wright

Enc. Summary response to public comments by topic dated November 19, 2019



Snohomish County

Public Works

3000 Rockefeller Ave., M/S 607
Everett, WA 98201-4046
(425) 388-3488
www.snoco.org

Dave Somers
County Executive

November 20, 2019

Gene Brazel
City Administrator
City of Lake Stevens
P.O. Box 257
Lake Stevens, WA 98258-0257

RECEIVED

NOV 21 2019

CITY OF LAKE STEVENS

Dear Gene:

The City of Lake Stevens has proposed a new City street, 24th Street SE, extending westerly from State Route 9 (SR9) from the location of the current intersection of SR9 and South Lake Stevens Road. To accommodate this new City street, the City proposes to close a short section of South Lake Stevens Road on the west side of SR9. South Lake Stevens Road will be realigned to intersect with the new 24th Street SE at a new signalized intersection,

South Lake Stevens Road is an important County arterial that functions as an alternative to SR 9 and 20th Street SE. In particular, it provides necessary capacity in the AM peak hour when these other two routes have significant queuing in the peak direction. To accommodate its arterial function, the realignment of South Lake Stevens Road must provide a continuous through route to its new intersection with 24th Street SE. South Lake Stevens Road should not turn at ninety degrees at the City limit line as originally proposed by the City.

The County has provided the City with an S-Curve alignment which is designed for a 25 mph speed limit. The alignment is shown on the attached. The County supports realignment of South Lake Stevens Road by the City utilizing the S-Curve alignment, a posted speed limit of 25 mph and intersection with 24th Street SE at a signalized intersection. As agreed, the S-Curve alignment will provide two travel lanes and shoulders on both sides, with at least one being wide enough for comfortable use by pedestrians. The new signalized intersection would be separated approximately 425 feet from the future roundabout proposed at the intersection of 24th Street SE with SR9 to adequately accommodate traffic queues.

Thank you for working with us to reach agreement on an alignment of South Lake Stevens Road that meets County and City needs.

Sincerely,

Steven E. Thomsen, P.E.
Public Works Director



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office 3190 160th SE Bellevue, Washington 98008-5452 (425) 649-7000

December 9, 2019

Peter Kahn
Costco Wholesale
999 Lake Drive
Issaquah, WA 98027

**RE: Ecology Comments on Costco Wholesale in City of Lake Stevens
Corps File No. NWS-2019-175
Ecology File No. 16923**

Dear Peter Kahn:

The Department of Ecology (Ecology) is currently reviewing the proposed Costco Wholesale site in the City of Lake Stevens. Specifically, we are reviewing wetland impacts and mitigation during preparation of the Section 401 Water Quality Certification (WQC) and Coastal Zone Management (CZM) consistency determination for your project. Listed below are the documents we reviewed and several concerns and recommendations we have.

Literature Sources Reviewed

Ecology has reviewed the following documents:

- Joint Aquatic Resources Permit Application (JARPA) received on February 21, 2019.
- Critical Areas Report, dated September 10, 2019.
- Wetland and Stream Mitigation Plan, dated November 8, 2019.
- Revised Impacts and Mitigation Report, dated November 15, 2019.
- Revised Mitigation Bank Use Plan, dated November 15, 2019.

Ecology Concerns

Ecology has the following concerns with the assessment of wetland impacts and proposed mitigation for this project:

1. The *Wetland and Stream Mitigation Plan* addresses direct wetland impacts to Wetlands A and D from construction of roadways and parking lots, but it inadequately addresses buffer impacts. Both of these Category II wetlands have habitat scores that should require 220' buffers, according to Ecology's *Wetland Guidance for CAO Updates*. Although the City of Lake Stevens would only require 95' buffers, Ecology considers this buffer

encroachment as an indirect wetland impact (paper fill) that requires compensatory mitigation at a replacement ratio 1/2 of direct wetland impacts.

2. The proposed on-site mitigation of wetland creation between the lobes of Wetlands A and D does not have adequate buffers. In order to surround this wetland creation area with 220' buffers on all sides, there is no area that could be protected adequately. This includes buffers extending from roadways on the north and east sides, as well as buffers extending from the adjacent property on the south.
3. The proposed grading to create wetland areas between the lobes of Wetlands A and D could affect the hydrology of the existing wetlands and change the frequency and duration of flooding. Currently, water movement between Wetlands A and D and between the two lobes of Wetland D is controlled by differences in elevation and narrow channels that slowly meter out the flow. It is not clear what the water depth, frequency, and duration of flooding would be once the wetland creation sites are constructed. No information was included on the infiltration rates of the soil within the wetland creation area to know if water would percolate into the soil or be impounded for prolonged periods.
4. The proposed off-site mitigation to enhance fish passage within a Mosher Creek tributary involves removal/replacement of six culverts. Because this mitigation occurs on an adjacent property not controlled by Costco, we are concerned with how maintenance and monitoring will occur over the 10-year period and what type of restrictive covenant would be established.

Ecology Recommendations

Ecology has the following recommendations on the proposed compensatory mitigation for this project:

1. Calculate the amount of indirect wetland impacts that occur in Wetlands A and D from new roadways if they were surrounded by a 220' buffer. Using a replacement ratio of 1/2 to 1, determine how much additional compensatory mitigation is needed to compensate for this indirect impact.
2. Eliminate the on-site wetland creation area between the lobes of Wetlands A and D because it cannot be surrounded by 220' buffers and there is an uncertain source of hydrology.
3. Recalculate the number of mitigation credits that need to be purchased at the Snohomish Basin Wetland Mitigation Bank based on additional indirect wetland impacts for buffer encroachment and eliminating on-site wetland creation as mitigation.
4. Provide proof of a temporary construction access agreement with the adjacent property owner that allows for maintenance and monitoring of the culverts along the Mosher Creek tributary for a 10-year period.
5. Provide proof of a restrictive covenant that protects the off-site mitigation area on the adjacent property in perpetuity.

If you have any questions or would like to discuss my comments, please give me a call at (425) 649-7199 or send an email to Doug.Gresham@ecy.wa.gov.

Peter Kahn
December 9, 2019
Page | 3

Sincerely,

A handwritten signature in black ink that reads "Doug Gresham". The signature is written in a cursive, flowing style.

Doug Gresham, PWS
Wetland Specialist
Shorelands and Environmental Assistance Program

By email

E-cc: Joe Burcar, Ecology
Melissa Place, City of Lake Stevens
Jordan Bunch, Corps of Engineers
Ed Sewall, Sewall Wetland Consulting
Ryan Kahlo, Watershed Company



6406 Marine DR NW
Tulalip, WA 98271
360-716-4214

March 27, 2020

Melissa Place, Senior Planner
City of Lake Stevens Planning & Community Development
1812 Main Street | PO Box 257
Lake Stevens, WA 98258-0257

On behalf of The Tulalip Tribes we thank you for the opportunity to provide comments on this project and future proposals. We look forward to future correspondence and communication. These comments pertain to biological evaluation and mitigation plan dated February 21, 2020.

Details in the mitigation plan mention trees and shrubs to be planted next to the tributary channel, but the planting scheme only has shrubs. Please clarify that more than shrubs will be planted in the buffer of Mosher creek.

The Tribes recommend extending the maintenance and monitoring in the stream channel portion of the mitigation package by an additional five years.

The wetland enhancement excavation plans show a narrow sill at an elevation of 300 ft that is consistent with the west edge of the adjacent wetland to the east. We would suggest that this sill be widened to provide additional surety that the sloped conditions in the excavation area does not result in drying the existing wetland to the east.

The soil amendment in the enhanced area appears to be only 4 inches thick, is that sufficient depth for soil amendment in this situation?

The Biological Evaluation needs to clarify that coho have been observed in the wetland just downstream of roundabout and that they have also been observed in Mosher Creek 300 – 400 meters downstream of project wetlands, these observations were made by Tulalip Tribal Biologists.

On page 9 in the biological evaluation under Compensatory Mitigation, it states: *“Wetland fill within the Mosher Creek basin shall be mitigated in the immediate area such that total wetland area in the Mosher Creek headwater is equal or greater than under existing conditions.”*

The Tulalip Tribes are federally recognized successors in the interest to the Snohomish, Snoqualmie, Skykomish, and other allied tribes and bands signatory to the Treaty of Point Elliott.



6406 Marine DR NW
Tulalip, WA 98271
360-716-4214

That statement is misleading as total wetland area in the headwaters of Mosher creek will be decreased by over an acre and mitigated elsewhere in a different basin. How is the total wetland area in the headwaters post mitigation equal or greater than existing conditions? There is not enough viable area for on-site mitigation to take place that is why a mitigation bank is being used.

Sincerely,

Zach Lamabull
Ecologist
The Tulalip Tribes
(360) 716-4620