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Department of the Army
Regulatory Branch
PO Box 3755
Seattle, Washington 98124

RE: Costco Lake Stevens & SE 24th Street Extension – Alternatives analysis
SWC Job#18-105

Dear USACOE,

This is the alternative analysis for a proposed Costco Warehouse within the City of Lake Stevens, Washington. This analysis is being prepared to support an Individual Permit necessitated by the proposed fill at the development site exceeding ½ acre.

Proposed Alternative

The proposed Costco warehouse and associated City of Lake Stevens SE 24th Street extension will result in a total of 1.87 acres of wetland fill.

In response to their adopted Comprehensive Plan and Planned Action, the City of Lake Stevens continues to pursue the implementation of the 20th St SE Corridor Subarea Plan. For this portion of the subarea this includes the development of 24th St SE, 91st Ave SE and a regional storm water facility to support the required infrastructure and future development. Costco is partnering with the City of Lake Stevens, for their mutual benefit, to provide some of the needed upfront funding and economic weight the City needs to encourage growth in this area while also providing Costco with a needed new location in the area.

As part of the City of Lake Stevens 20th SE Street Corridor Subarea Plan, 24th St SE will extend through the site and then curve to the north becoming 91st Avenue SE. This new road system will provide traffic flow and access to the commercial properties within this new road alignment. The extension of these roads will then allow development of the only undeveloped property within the City of Lake Stevens area with the appropriate zoning and size to construct a big box store as is proposed with the new Costco Warehouse. In addition to the road, the City's plans include a regional storm water facility to accept storm water from planned roads and commercial areas. Since the proposed road work and construction of the Costco Warehouse are closely related, this

application is being submitted to cover the roads, regional storm water facility and Costco as one project.

The City of Lake Stevens and Eastern Snohomish County is a rapidly growing and expanding area. Due to growth pressures in the State and in the region the City of Lake Stevens is has rezoned the new area for general commercial use. Currently, Costco members that live in the Lake Stevens area have to drive significant distances and then put up with highly congested shopping experiences at the 3 warehouses that are closest to this site. The proposed new warehouse will be a benefit to Costco members in the Lake Stevens area as well as reduce the vehicle miles and pollution generated from those members traveling to the current Costco warehouses (Everett to the west, Marysville to the north and Woodinville to the south).

The location of the proposed Costco Warehouse is on the only undeveloped site within the City of Lake Stevens, and in the neighboring County area with enough sizes where a large retail facility such as this can be built. This is detailed in the City of Lake Stevens “20th Street SE Corridor Subarea Plan Background information” document dated May 1, 2018 and attached to this application.

The 24th Street SE and 91st Avenue SE road projects as well as the regional storm water facility are part of the planned transportation expansion and access to commercial properties as detailed in the City of Lake Stevens 20th Street SE Corridor Subarea Plan.

No Build Alternative

A no-build alternative would mean the Costco Warehouse would not be built, although the 24th Street and 92st Avenue SE would be built as part of the City’s Subarea plan. This road work would impact 0.77acre of Category II and II wetland. In addition, it is expected another large commercial store would apply to build in the same location as the proposed Costco as it is the only place with the size, zoning and infrastructure to support such a commercial facility. Therefore it is likely that if Costco did not build on the site, another entity would with similar impacts (total of 1.87 acre) to wetlands. If this property is not developed by Costco at this time, the City’s rezoning of the property means it will always be under development pressure and these wetlands will always be endangered by encroachment of adjacent development. Costco will also be dedicating the remaining wetlands south of 24th to the City for long term conservation as well.

Alternate Site Location

There are no parcels or groups of parcels within this area of Snohomish County within areas zoned for large retail stores that would be a suitable alternative location for the proposed Costco Warehouse. This site is the only site in the region with the appropriate zoning and road infrastructure to allow a store to be built. An alternative site was investigated by Costco at the intersection of Soper Hill Road and SR 9 (Parcels

#00590700030500 & #00590700031800). However, the site was determined to be too small for the current warehouse requirements, was outside the market area for the warehouse, and was found to have inadequate access from Highway 9. As a result this site was determined to not be a feasible alternative.

Impacts Minimization

Several design methods were utilized to reduce and minimize impacts to wetlands. This includes utilization of retaining walls along the south edge of the proposed road impacts to reduce the footprint of wetland impact. The road width is also reduced to the minimum needed for safe and efficient passage of vehicles on this roadway.

The store impacts have been minimized to the greatest amount feasible and still make a functional store that will serve the members in the Lake Stevens area of Snohomish County. Parking spaces have been reduced to the minimum needed for the store.

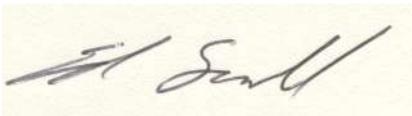
The footprint of the warehouse cannot be reduced through going vertical. The nature of Costco's business results in large bulk items carried in carts which will be possible in a multi-story warehouse or parking lot configuration.

Mitigation for impacts

Mitigation for the impacted wetland area as well as functions from this proposal will be compensated through purchase credits purchased through the Snohomish County Habitat Bank. In addition, storm water functions will be mitigated through the construction of the regional storm water facility.

If you have any questions or require any additional information please feel free to contact me at (253) 859-0515 or at esewall@sewallwc.com.

Sincerely,
Sewall Wetland Consulting, Inc.



Ed Sewall
Senior Wetland Ecologist PWS #212