



*Planning and Community Development
Type I and II Decisions
Site Plan Review, Design Review,
Binding Site Plan & Administrative Deviations*

Costco

LUA2019-0080, LUA2019-0081, & LUA2019-0156

A. PROJECT DESCRIPTION AND REQUEST

Costco Wholesale is requesting approval of a Binding Site Plan (LUA2019-0156), Site Plan Review (LUA2019-0080) and Design Review (LUA2019-0081) and two administrative deviations to develop a Costco warehouse of approximately 160,000 square feet in size with a fuel facility. The project is in the Commercial District zone, within the 20th Street SE Corridor Subarea, on seven parcels totaling nearly 36.74 gross acres (**Exhibit 1**). The net site area available for development is nearly 21.67 acres after removal of future city roads, the stormwater facility, wetlands and mitigation areas and Lot 2. The development is proposed to be accessed off two new roads: 91st Ave SE and 24th St SE. Other related traffic improvements will include realigning South Lake Stevens Road and constructing a roundabout on SR-9 at the intersection of South Lake Stevens Road and 24th St SE.

The binding site plan is a Type II decision, the site plan review is a Type II decision and the design review is a Type I decision. They are all administrative decisions and are being reviewed and processed collectively per LSMC 14.16A.220(g) – consolidated permit process. The Planning Director has the authority to make the final decision on all three permits and the requested administrative deviations per LSMC 14.16B.115, 14.16B.215, and 14.16C.120. These initial administrative permits deal with the ability of the project to meet defined land uses per Chapter 14.38 LSMC, meet dimensional and landscape standards per Chapter 14.38 LSMC, site plan standards per LSMC 14.16C.105, Design Review per LSMC 14.16C.050, and the future lot configuration and subdivision requirements per Chapter 14.18 LSMC. The analysis and review of these administrative permits are considered non-discretionary permits; that is if the project meets the adopted standards and allowed modifications, the city must approve the project.

The City Council approved a related application for a development agreement (LUA2019-0178), which is a Type VI legislative application, on December 10, 2019 via Resolution No. 2019-17. The development agreement was not appealed and stands as approved. The development agreement was recorded on March 19, 2020. The construction of the Costco Project is dependent on the construction of the following improvements that will ultimately be located off the Costco Project site: wetland mitigation, sewer facilities (e.g., lift station, force main and gravity lines), stormwater improvements, culvert replacements/removals, and transportation and utility improvements. These public projects are critical to the overall project and are described in more detail in the development agreement. Additional permits related to the actual construction of public and private improvements will follow as separate applications.

B. GENERAL INFORMATION

1. Date of Application(s):
 - a. April 30, 2019 (site plan, design review, & planned action certification);
 - b. September 19, 2019 (binding site plan);

2. Completeness Date(s):
 - a. May 23, 2019 (site plan, design review, & planned action certification);
 - b. September 19, 2019 (binding site plan);
3. Project Name: Costco
4. Project Location: 2326 S. Lk. Stevens Road, 2404 S. Lk Stevens Road, 9208 21st St. SE, 9126 21st St. SE, Lake Stevens, WA 98258
5. Tax Parcel Number(s): 00457000002102, 00457000002201, 00457000002304, 00457000002401, 00457000002501, 00457000002502, 00457000002503
6. Property Owners: City of Lake Stevens and Nordin Investments LLC.
7. Applicant(s)/Contact(s): Steve Bullock of MG2 & Paul Rice of DOWL Engineering, Inc., on behalf of Costco Wholesale
8. Total Area of Project: Approximately 36.74 gross acres / 21.67 net acres

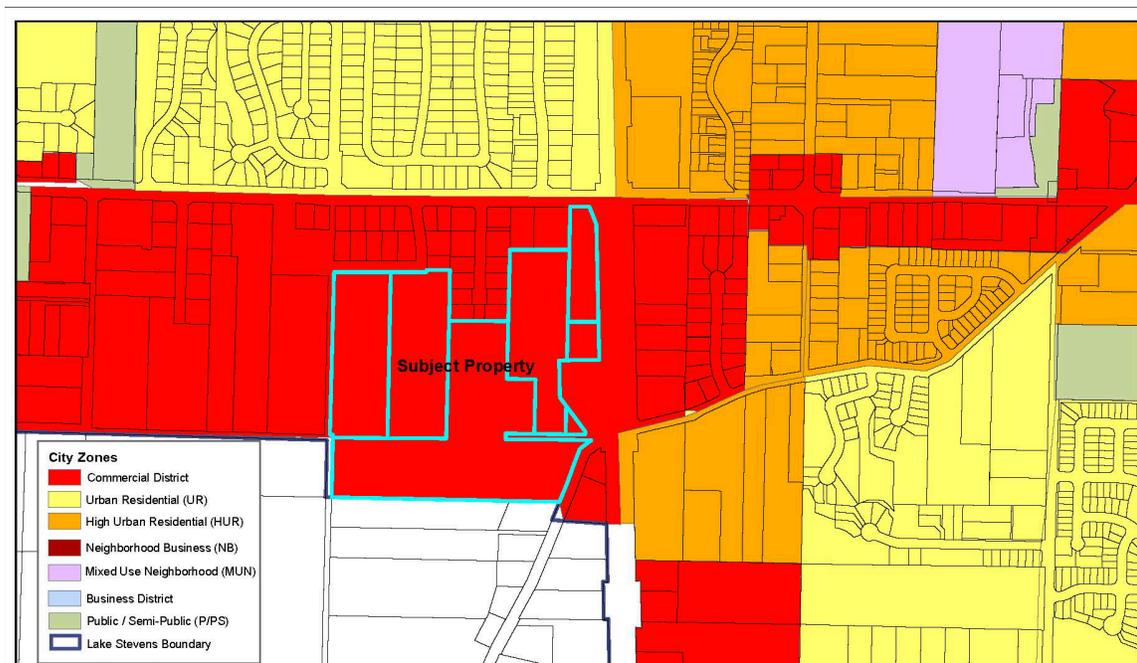
Vicinity Map



9. Comprehensive Plan Land Use Designations, Zoning Designation and Existing Land Uses of the Site and Surrounding Area:

AREA	LAND USE DESIGNATION	ZONING	EXISTING USE
Project Site	Commercial	Commercial District	Vacant and SFR
North	Commercial	Commercial District	Residential
South	N/A – County jurisdiction	N/A – County jurisdiction	Rural residential
East	SR-9/Commercial & High Density Residential	SR-9/Neighborhood Business & High Urban Residential	Highway (SR-9) & Residential
West	Commercial	Commercial District	Vacant

Zoning Map



10. Public Utilities and Services Provided by:

Water:	Snohomish County PUD	Gas:	Puget Sound Energy
Sewer:	Lake Stevens Sewer District	Cable TV:	Comcast
Garbage:	Allied Waste/Waste Management	Police:	City of Lake Stevens
Storm Water:	City of Lake Stevens	Fire:	Lake Stevens Fire District
Telephone:	Verizon	School:	Lake Stevens School Dist.
Electricity:	Snohomish County PUD	Hospital:	Providence Hospital

C. ANALYSIS1. Application Process:

- a. Steve Bullock of MG2 on behalf of Costco Wholesale, submitted a Type I application (design review) (**Exhibit 2**) and two Type II applications (site plan and planned action certification) for approval on April 30, 2019 (**Exhibits 1 and 6a**).
- b. The city deemed the site plan and design review applications complete as of May 23, 2019 (**Exhibit 5**).
- c. On September 19, 2019, Paul Rice of DOWL Engineering Inc., on behalf of Costco Wholesale, submitted a Type II application (binding site plan) (**Exhibit 3**) for approval which was deemed complete upon submittal (**Exhibit 5**).
- d. The individual project components have been reviewed by city staff and partner agencies.
 - i. Formal comments, for the site plan and design review, were provided to Costco on July 9, 2019.
 - ii. Formal comments on the BSP were provided to Costco on November 4, 2019.
- e. The revised site plan and design review was submitted to the city on October 31, 2019 (**Exhibits 1a and 2a**). The final site plan was provided to the city on March 23, 2020 (**Exhibit 1b**).
- f. The revised binding site plan submitted to the city on April 15, 2020 is the official binding site plan for LUA2019-0156 (**Exhibit 3b**).
- g. The revised binding site plan, revised site plan and design review package and associated revised project plans/studies have generally addressed the city's review comments. Any comments not addressed are either conditions of approval in this staff report or will be conditions of approval associated with the construction plan approval decision.

CONCLUSION: The application meets the procedural requirements for Type I & II applications established in Title 14 of the LSMC.

2. Public Notification and Process:

The city provided public notice of the project actions in accordance with LSMC 14.16A.225(a)(4), whereby "no proceeding of any procedure established in this chapter shall be found to be invalid for failure to provide mailed notice as required in this section as long as the other methods of notice have met their respective requirements and there was a good faith attempt to comply with the mailed notice requirements." The city also utilized the planning goals of RCW 36.70A.020 in the development and adoption of its comprehensive plans and development regulations, including that of the 20th St SE Corridor Subarea Plan.

- a. The city published a combined Notice of Applications for the site plan, design review, and planned action certification for the Costco project, per LSMC 14.16B.225, in the Everett Herald; mailed it to property owners within 300 feet of the site; emailed it to the Notice of Application distribution list, and posted it on the subject property (5 sign locations), city hall bulletin board and city website on or around June 5, 2019 (**Exhibits 6a and 7a**).
- b. The city published a Notice of Planned Action Certification for the public roads per LSMC 14.16B.225(e), in the Everett Herald; mailed it to property owners within 300 feet of the site; emailed it to the Notice of Application distribution list, and posted it on the subject property

- (5 sign locations), city hall bulletin board and city website on or around April 22, 2019 (**Exhibit 6b**).
- c. The city published a SEPA Mitigated Determination of Non-Significance (MDNS) for the public road of 24th St SE per LSMC 16.04.085, in the Everett Herald; mailed it to property owners within 300 feet of the site; emailed it to the SEPA distribution list, and posted it on the subject property (5 sign locations), city hall bulletin board and city website on or around April 22, 2019 (**Exhibit 6c**).
 - d. The city published a Notice of Public Meeting for site plan and design review, pursuant to Interim Ordinance No. 1055, due to the Design Review component, in the Everett Herald on June 26 2019; mailed it to property owners within 300 feet of the site; emailed it to the Notice of Application distribution list, and posted it on the subject property (5 sign locations), city hall bulletin board and city website on or around June 24, 2019 (**Exhibit 7b**). The purpose of the public meeting was for the Design Review portion of the project per Interim Ordinance No. 1055. However, the applicant provided information on a variety of topics at this meeting including, site design, building design, traffic/transportation, stormwater and critical areas among other topics. City staff and Costco consultants/staff were available to address public comments by topic.
 - e. The city published a Notice of Application for the binding site plan, per LSMC 14.16B.225, in the Everett Herald; mailed it to property owners within 300 feet of the site; emailed it to the Notice of Application distribution list and to the Interested Parties list, and posted it on the subject property (5 sign locations), city hall bulletin board and city website on or around October 2, 2019 (**Exhibit 7c**).

CONCLUSION: The city has met the noticing requirements for Type II applications established in Chapter 14.16B LSMC, Part II.

3. Public Comments:

- a. A public meeting on the site plan and design review for the proposal was held on July 11, 2019 pursuant to Interim Ordinance No. 1055, due to the design review component, with city staff and representatives from Costco in attendance. At the public meeting, the public had the opportunity to discuss other facets of the project, not limited to only design comments, with the professional experts and available city staff. Approximately 126 citizens attended (**Exhibit 8**).
- b. As of the writing of this staff report, written public comment from 241 different individuals or agencies have been received concerning this proposal. Generally, 70% are in favor of the proposal and 23% are opposed, with the remainder of commenters neither opposed nor in favor. Due to the numerous comments received, the city prepared a summary response to the comments by topic (e.g., wetlands, traffic, etc.) in **Exhibit 11a**. The topics in the summary response include the following: General Environment, Land Use, Traffic, Wetlands/Streams, Water Resources, Procedural, Noise, Air Quality, Light, Economics, Public Services, Utilities, Trees/Aesthetics, and Soils/Geotechnical.
- c. All public comments (as of the date of this staff report) are included in **Exhibit 10**, which is comprised of all comments received (verbatim) by form (letters, emails, etc.) in accordance with LSMC 14.16B.655(b). The applicant's attorney, Stoel Rives LLP, responded to the Linder and Whipple public comments in a letter to the city on November 8, 2019 (**Exhibit 11c**).

d. Agency Comments (Exhibit 10a):

- 1) The Tulalip Tribes provided four letters with comments on the project. Their concerns included potential habitat impacts to fish, maintaining the water quality and quantity to nearby Mosher Creek and related tributaries, the proposed filling of wetlands resulting in potential habitat degradation, clarification on the identification of critical areas on-site in the critical area reports, additional stormwater information for the project and consideration of LID (low impact development) for the project, groundwater and grading concerns, cumulative impacts on the environment, wetland delineation discrepancies, and the avoidance and minimization of environmental impacts from the project.

City Response: The city and applicant have coordinated with the Tulalip Tribes on their concerns with the project. The city held two face-to-face meetings with the Tulalip Tribes and other agencies in May and December of 2019 in order to better understand and address their concerns. The city and applicant have been coordinating informally with the Tulalip Tribes on site visits, conference calls, phone calls and emails throughout the project.

As a result, the plans for Costco and the off-site improvements were revised to incorporate changes to improve fish habitat and provide mitigation for the proposed impacts. Costco has also incorporated LID features into the stormwater plans for the project. As a voluntary mitigation measure, if landowner approval is obtained, Costco is proposing to remove and/or replace a total of six off-site culverts within a tributary of Mosher Creek with fish passable culverts to improve fish habitat and the existing substandard culvert east of SR-9 will also be replaced with a fish passable culvert. The project will also create 0.45 acres of wetland/fish habitat along Wetland D at present, Costco has obtained approval from one of two landowners and is continuing to negotiate with the other landowner to obtain necessary access for the culvert removal/replacement project. The city and applicant will continue to coordinate with the Tulalip Tribes for the duration of the project.

- 2) Snohomish County Public Works provided two letters and two emails on the project. Their concerns included the design and location of the roundabout and 24th St SE as it relates to South Lake Stevens Road, the location and design of the realignment of South Lake Stevens Road, and a desire for an AM peak hour traffic analysis due to the realignment of South Lake Stevens Road. The County was also concerned about the impact of trips on County arterials south of the project site including the intersection of S. Lake Stevens Road and Bickford Ave. The County requested that a SEPA addendum be prepared to determine if significant adverse traffic impacts would occur on the County's arterial road network from development of the project.

City Response: The city responded to Snohomish County in a letter dated November 19, 2019 (Exhibit 11b). The city has coordinated with the County in evaluating the different alternatives for South Lake Stevens Road. At the request of Snohomish County, Lake Stevens revised the previously proposed C-curve to an S-Curve for the section of South Lake Stevens Road and its connection with 24th St SE. The City of Lake Stevens would need to apply for a Type D permit through the County for work outside of Lake Stevens city limits.

Snohomish County's concerns regarding intersection spacings were analyzed and addressed in the traffic reports and memos prepared for the project. WSDOT is the lead

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

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.

- 3) The City of Everett provided a letter dated June 19, 2019 concerning the proposed 91st Ave SE roadway crossing its 100-foot water transmission line easement. The water transmission line easement contains three separate 48-inch diameter pipelines. The City of Everett requested that it be able to review and approve the proposed design of road prism prior to construction.

City Response: The city has coordinated with the City of Everett on its concerns with the road crossing since the beginning of the project. The City of Everett and the City of Lake Stevens executed an interlocal agreement on January 31, 2020 to address the concerns and address the permitting, design, and proportionate share responsibilities and costs for each city.

- 4) The Department of Ecology (DOE) provided a letter dated May 6, 2019 stating that the wetlands on the property would be considered waters of the state and may require state and federal permits. DOE listed the steps to obtain such authorization. The Department of Ecology sent another letter dated December 9, 2019 providing its initial assessment of wetland impacts and proposed mitigation for the project. DOE concerns included the need for 220-foot buffers on Wetlands A and D due to current DOE wetland guidance, indirect wetland impacts (paper fill) from buffer encroachment, hydrology between Wetlands A and D, and maintenance and monitoring of the replaced/removed off-site culverts. The letter also included recommended proposed compensatory mitigation measures for the project.

City Response: The applicant has contacted the U.S. Army Corps of Engineers (USACE) and has submitted a JARPA application form to DOE and a 404 permit for wetland fill to the USACE on February 19, 2019. A mitigation plan for the project has been prepared and revised by Sewall Wetland Consulting, the latest dated April 6, 2020. The revised mitigation plans for the project include paper fill, that is the project applies mitigation ratios as if an actual fill has occurred, for the 220-foot buffers and compensatory mitigation at the ratios proposed by DOE. The applicant has been coordinating with the USACE and the Tulalip Tribes on the mitigation of potential impacts to streams and wetlands for the project. The applicant has been in contact with and coordinating with both agencies including submitting mitigation plans and revised plans as they are prepared.

To address environmental concerns, the project is undergoing regulatory review from several other agencies including the US Army Corps of Engineers (404 Wetland Permitting); Washington Department of Ecology (401 Water Quality Certification); and the Washington Department of Fish and Wildlife (Hydraulic Project Approval). As WSDOT is constructing the roundabout at SR-9/24th St SE, its environmental staff is overseeing the regulatory process for permitting for the roundabout as a separate project.

CONCLUSION: As conditioned, the application meets the public notification and minimum comment period requirements of Titles 14.16A, 14.16B and 16.04 LSMC.

4. LSMC 14.18 - Binding Site Plan:

- a. Chapter 14.18 LSMC, Part II provides the city's subdivision regulations for binding site plans as they apply to the division of commercial lands and or division of lands for special purposes or for condominiums.
- b. The applicant has provided a binding site plan to create one new commercial lot and eight (8) tracts (**Exhibit 3**). Lot 2 is to be retained by Costco for potential future parking or to be sold/leased in the future. Tracts A, C, D and H are to be dedicated as Native Growth Protection Areas. Tract B is for the regional stormwater facility. Tracts E, F, and G are for public roads and will be conveyed to the city upon completion.
- c. Decision Criteria (LSMC 14.18.120):
 - i. Requirements of this part. *The application meets the subdivision requirements for binding site plans described in Chapter 14.18 LSMC, Part II.*
 - ii. Requirements for noise control in Chapter 9.56. *Chapter 9.56 prohibits certain motor vehicle and public nuisance and disturbances noises. It is anticipated that the uses proposed for the project will comply with this chapter. Construction noise must comply with standard construction hour limitations identified in LSMC 9.56. Noise from the proposed development shall comply with the noise provisions set forth in the LSMC and the noise control provisions found in RCW 70.107.*
 - iii. Requirements for public or private roads, right-of-way establishment and permits, access, and other applicable road and traffic requirements. *The project will include the construction of two new public roads, 91st Ave SE and 24th St SE; a realigned S. Lake Stevens Road; replacement of culverts to meet fish passage criteria as a separate project; and a roundabout on SR-9 at the intersection of South Lake Stevens Road and 24th St SE as a separate project. The realignment of South Lake Stevens Road is being coordinated with the applicant, city and Snohomish County. The roundabout is being coordinated with the applicant, city and WSDOT. Associated frontage improvements will be constructed as part of the new public roads of 91st Ave SE and 24th St SE, of which, Costco's proportionate share is as set forth in the development agreement. The public roadway improvements plus the proposed private access and parking areas have been reviewed by the city's Senior Engineer and found sufficient as identified in the 20th Street Subarea Plan and city's Capital Improvement Plan. Please also see the applicable traffic analysis reports and memorandums associated with the project (**Exhibit 12**).*
 - iv. Compliance with fire lane, emergency access, fire-rated construction, hydrants and fire flow, and other requirements of Chapter 14.84. *The Fire Marshal has reviewed and recommended approval of the binding site plan deferring further detailed comments to construction plan review. The application meets the requirements for emergency access and protection.*
 - v. Compliance with applicable construction code requirements, Chapter 14.80. *The applicant will be required to obtain building permits and meet applicable requirements at the time of building application.*

- vi. Compliance with applicable use and development standard requirements of this title. *The proposed site plan meets the development standards of this title, except for varying the signage standards through LSMC 14.68.124 – Incentive Provisions for Exceptional Efforts and the lighting standards through the administrative authority LSMC 14.16C.120.*
 - vii. Compliance with applicable shoreline management code requirements of the Shoreline Master Program, Chapter [14.92](#) and/or flood hazard area requirements of Chapter 14.64. *The application is not within a shoreline of the state, nor does it lie within a flood hazard area.*
 - viii. Compliance with environmental policies and procedures and critical areas regulations of Title 16 and Chapter 14.88. *The application meets environmental and critical areas regulations - see Sections 12 and 17 below.*
 - ix. Compliance with applicable drainage requirements of Chapter 14.64. *The design of the project includes a stormwater facility in Tract B, based on a draft stormwater report prepared by DOWL Engineering Inc., dated February 2020 (Exhibit 12). Prior to the issuance of construction plans, the applicant must demonstrate that a fully functioning stormwater system in accordance with local, state, and federal regulations will be constructed.*
 - x. Compliance with applicable impact fee requirements. *Impact fees will be assessed at the time of building permit application or as set forth in the development agreement for the project.*
 - xi. Provisions for adequate sewer service, water supply and refuse disposal: *Water, sewer and refuse disposal will be constructed or extended as part of the project and will be available to serve the site. The applicant has provided preliminary utility plans with their preliminary civil plans through the site plan review process and has been coordinating with the applicable utility providers on the project.*
 - xii. Any other applicable provision of this title. *All other applicable provisions of this title are addressed within this staff report and are either in compliance, are conditions proposed to ensure compliance, or have been modified through the development agreement.*
- d. City staff reviewed the binding site plan in September/October 2019 for consistency with the applicable regulations and provided a review comment letter to the applicant on November 4, 2019.

The applicant provided a response to the city's review comments and revised plans on November 19, 2019. Further revisions to the binding site plan occurred and were provided to the city on April 15, 2020. Staff has reviewed their response and revised plans and recommends the following conditions of approval:

- i. The revised binding site plan submitted on April 15, 2020 (**Exhibit 3b**) is the official subdivision map for LUA2019-0156. Any development of the site shall be in general conformance with the approved binding site plan unless modified per LSMC 14.18.170.
- ii. A copy of the binding site plan map shall be provided for city review to ensure conformance with the conditions of approval prior to recording of the BSP.
- iii. After approval of the binding site plan, the applicant shall record with Snohomish County the approved binding site plan with a record of survey as one recording document

complying with the requirements of LSMC 14.18.130 within one year of this decision. Copies of the recorded binding site plan documents shall be provided to the city.

- e. The application meets the criteria of RCW 58.17.040(7), which allows cities to establish procedures for approving binding site plans.

CONCLUSION: The proposed binding site plan as conditioned is consistent with the criteria described in Chapter 14.18 LSMC, Part II and RCW 58.17.040(7).

5. LSMC 14.16C.105 - Site Plan Review:

Site Plan Review is required per LSMC 14.16C.105(b) for all multiple-family, commercial, industrial, utility, shoreline development, public-initiated land use proposals, the expansion and exterior remodeling of structures, parking, and landscaping, and as otherwise specified in the municipal code. The purpose of the site plan review process is to determine compliance with the city's applicable development regulations and Comprehensive Plan provisions and to ensure the following have been achieved:

- 1) To coordinate the proposal, as is reasonable and appropriate, with other known or anticipated development on private properties in the area and with known or anticipated right-of-way and other public projects within the area;

Findings: The project is consistent with the proposed land uses and intensity envisioned in the 20th Street SE Subarea Plan and has been designed to incorporate the public improvements contemplated in this plan.

- 2) To encourage proposals that embody good design principles that will result in high quality development on the subject property;

Findings: Through the application of the city's design guidelines the project meets the requirement of high-quality development.

- 3) To determine whether the streets and utilities in the area of the subject property are adequate to serve the anticipated demand from the proposal; and

Findings: The road network being proposed for the project are those identified in the subarea plan and city's capital facilities plan, which were designed to meet projected land use demands, meet the city's level of service standards and meet circulation and safety requirements. The project also includes the extension or development of appropriate utilities and infrastructure including stormwater, sewer and other utilities to serve the project and greater area.

- 4) To review the proposed access to the subject property to determine that it is the optimal location and configuration for access.

Findings: As noted above, the location of this retail complex was identified in the city's subarea plan as an appropriate location for the land use predicated on the construction of the identified street network and intersection improvements.

LSMC 14.16C.105 (e) - Application Approval:

1. The approval authority shall approve, approve with conditions, or disapprove the application. The approval authority may grant final approval subject to any conditions it feels necessary to protect and promote the health, safety and general welfare of the community.

2. Site plans shall be consistent with the applicable regulations and Comprehensive Plan provisions.
 - a. City staff reviewed the site plan in May/June of 2019 for consistency with the applicable regulations and provided a review comment letter to the applicant on July 9, 2019
 - b. The applicant provided a response to the city's review comments and revised plans on October 31, 2019. Staff has reviewed their response and the revised site plan provided on March 23, 2020 and recommends the following conditions of approval:
 - i. The revised site plan submitted on March 23, 2020 (**Exhibit 1b**) provides the final general layout of the site and offsite improvements for Costco. Any development of the site shall be in general conformance with the approved site plan unless modified per LSMC 14.16C.025.
 - c. Staff has also reviewed the site plan for consistency with the Comprehensive Plan and 20th St SE Subarea Plan and has found the site plan consistent with both plans.

CONCLUSION: Staff has administratively reviewed the project against the applicable criteria and is recommending approval of the site plan subject to the proposed conditions of approval.

6. LSMC 14.16C.050 - Design Review (Interim Ordinance No. 1055):

Design Review is required per LSMC 14.16C.050(b)(2) for development located within adopted subareas that are required to meet the adopted subarea design guidelines. As this project is located within the 20th St SE Corridor Subarea, it is subject to the subarea design guidelines.

- a. Staff has administratively reviewed the project against the applicable design guidelines and has provided a recommendation for the Director's consideration (**Exhibit 9**).
- b. The revised site plan and landscape plan provided on March 23, 2020 (**Exhibit 1b**) provides the general layout of the site's design and offsite improvements for Costco. The design review package revised on October 31, 2019 (**Exhibit 2a**) provides the building and fuel canopy elevations for Costco. Development of the site shall be in general conformance with the approved design review package and final site plan and landscape plan unless modified per LSMC 14.16C.025.

CONCLUSION: The proposed Costco project meets the site plan and design review standards identified in LSMC 14.16C.105 and 14.16C.050 and Interim Ordinance No. 1055.

7. Administrative Deviations - LSMC 14.16C.120 and LSMC 14.68.124:

The applicant formally requested administrative deviations to signage and lighting standards on November 8, 2019.

Lighting

- a. In the subarea, light fixtures shall not be taller than 30 feet in height per LSMC 14.38.080(c). Costco is proposing fixtures 34.5 feet high (**Exhibit 4**).
- b. The applicant is requesting a deviation of a 4.5-foot increase to this standard as it will result in fewer total fixtures being needed on-site and a reduction in the amount of energy

needed to run them. The applicant is proposing full cut off fixtures to mitigate any light impacts from the taller fixtures.

- c. Staff has reviewed the request and believes the request meets the criteria set forth in LSMC 14.16C.120(c) for an administrative deviation.
- d. The applicant provided a photometric plan with their initial land use submittal to review light levels on adjacent properties and ensure compliance with city code. The city requested additional information from the applicant for lighting levels on the north end of the site, measured five feet or beyond from an exterior property line as per LSMC 14.38.080(b)(2)(iii). In their revised photometric plan provided on October 31, 2019, the applicant demonstrated compliance with the above section of code.
- e. Staff recommends approval of this deviation as the photometric plan demonstrates that the taller fixtures will not have adverse lighting impacts to adjacent properties.

Signage

The applicant is requesting consideration under LSMC 14.68.124 - Incentive Provisions for Exceptional Efforts, whereby the director can relax certain requirements for signs (**Exhibit 4**). Staff requested additional information from the applicant with the first round of review to process their request for consideration; namely a response to the provisions of LSMC 14.68.124, materials showing the dimensions of the signage, and to what extent they exceed the maximum area allowed by code.

The applicant provided the information requested by staff on November 8, 2019. One projected wall sign on the façade is over the allowed sign square footage of 192 sq. ft; however, the total square footage of on-site signage is less than the total maximum for the site allowed by the municipal code. The total maximum allowed is 585 square footage of signage and the applicant proposes a total of 486 square ft. Additionally, the style and architecture are integrated into the entire development of the site and are aesthetically complimentary of the property. Based on the above, staff recommends approval of this request.

CONCLUSION: The proposed administrative deviations to signage and lighting for the project comply with the criteria set forth in LSMC 14.16C.120(c) and LSMC 14.68.124.

8. Comprehensive Plan, Zoning, and Permissible Uses:

- a. The city of Lake Stevens Comprehensive Plan identifies the existing parcels with a Commercial land use designation, with a corresponding zoning district of Commercial District. Retail trade is a principal use without restriction in the Commercial District.
- b. Fuel sales are considered a retail trade and allowed as a principal use without restriction.
- c. The city's *20th Street SE Corridor Subarea Plan*, adopted in 2012, identified retail nodes along the entire corridor and identified the 20th Street SE/SR-9 intersection specifically as a potential site for a large retail center. The properties southwest of this intersection (including the proposed Costco site) were zoned commercial to promote retail growth in this area with larger parcels available for development. The southwest corner of SR-9 and 20th Street SE is explicitly identified as a location for a retail center that could include big box retail.

d. The proposal is consistent with several goals and policies of the 2015-2035 Lake Stevens Comprehensive Plan and the 20th Street SE Corridor Subarea Plan, including but not limited to the following:

- **2035 Lake Stevens Vision** – *As the city contemplates the next 20 years, it must embrace its position as a unified growing city. Lake Stevens will be a vibrant sustainable community that provides a positive development atmosphere and maintains a strong community image with excellent schools and neighborhoods. Sustainability will be manifested through environmental protection, conscientious community development and sound economic policy. The city will continue emphasizing the role of local growth centers and subarea planning as the primary locations for new development – specifically as essential pockets for economic development and focal points for new neighborhood and commercial areas. The city will ensure that the city’s infrastructure and public services will meet the demands of the community as it grows in an economically feasible manner. Development will be sensitive to the lake, environment and existing neighborhoods. The community will become a balanced community with sufficient and affordable housing, family-wage jobs and a variety of shopping and service options to meet the needs of Lake Stevens’ residents.*

Land Use Element

- **Policy 2.1.5** *Coordinate land use decisions with capital improvement needs for public facilities including streets, sidewalks, lighting systems, traffic signals, water, storm and sanitary sewer, parks and recreational facilities, cultural facilities and schools.*
- **Goal 2.4** *Encourage the continued planning of local growth centers to develop a balanced and sustainable community that provides a focus for employment, public, and residential development.*
- **Policy 2.4.4** *Ensure that adequate connections are made to link growth centers, subareas and adjacent residential areas.*
- **Goal 6.3** *Enhance retail and personal services growth to address the community’s needs and expand the city’s retail sales tax base.*
- **Goal 6.4** *Support employment growth in the city.*

Economic Development Element

- **Goal 6.1** *Improve the city’s economic conditions for a healthy, vibrant, and sustainable community with a high quality of life.*
- **Goal 6.2** *Manage commercial growth in centers.*
- **Goal 6.3** *Enhance retail and personal services growth to address the community’s needs and expand the city’s retail sales tax base.*
- **Goal 6.4** *Support employment growth in the city.*
- **Policy 6.4.1** *Develop zoning for employment/business areas that is flexible to support employment growth and large employers.*
- **Goal 6.6** *Participate and foster public and private partnerships.*

Capital Facilities Element

- **Policy 9.2.2** Capital improvement projects identified for implementation in this Plan and at a cost of at least \$10,000 shall be included in the Six-Year Schedule of Improvement.
- **Policy 9.3.2** Appropriate funding mechanisms for developments' contribution of a fair share of other public facility improvements [such as recreation, drainage and solid waste] will be considered for implementation as the city develops them.
- **Goal 9.4** Provide needed capital improvements to maintain adopted levels of service.

20th St SE Corridor Subarea Plan

- **Policy 1.4 – Incentives for Public Amenities in New Developments 1.4.1** -Develop new land use regulations governing uses, intensities and heights that allow additional development potential in return for a development with specified public amenities (pg. 24).
- **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 (pg. 30).
- **Policy 3.1.4** - Identify separate nodes for commercial/mixed-use development. For example, the southwest corner of 20th Street SE and SR- 9 is proposed for a large regional commercial development. The northwest corner of the same intersection or the northeast intersection of 20th Street SE and 79th Avenue SE could be identified for mixed-use development (pg. 31).
- **Policy 4.3.1** - Achieve more connectivity and accommodate development as it occurs, by identifying additional public streets of any class defined in the layered network or significant upgrades to existing streets as development occurs. For example, constructing a new street, 24th Street SE, in the southern part of the subarea would provide a secondary east-west connector for local vehicle access and could be developed as a trail street to support walking and biking (pg. 33).
- **Policy 5.2.3** - New development within the subarea should utilize a variety of environmental enhancement and low impact development techniques such as rain gardens, pervious pavement, and other infiltration techniques as appropriate and feasible (pg. 38).

CONCLUSION: The application, as conditioned is consistent with the Lake Stevens Comprehensive Plan, 20th Street SE Corridor Subarea Plan, and permissible uses identified in Chapter 14.38 and 14.40 LSMC.

9. LSMC 14.38 and 14.48 Density and Dimensional Standards:
 - a. The proposal was reviewed for consistency against the zoning regulations found in Chapter 14.38 LSMC as part of the site plan review.
 - b. *Lot Size/Dimension* - There is no minimum lot size requirement in the Commercial District. Prior to and pending approval of the BSP, there is adequate area for the proposed use.

- c. *Building Setbacks* - The minimum building setback requirements are five feet for front and 10 feet for side and rear in the Commercial District zone per Table 14.38-I. There is a minimum 5-foot landscape buffer, Type C screen, required along the side and rear property lines per LSMC 14.38.040 footnote #7. The warehouse building and fuel facility as proposed meet the minimum setback requirements.
- d. *Maximum Impervious Surfaces* - There is no maximum impervious surface requirements in the Commercial District. Approximately 19.41 acres of new impervious surface associated with buildings, parking lots and drive aisles, and proposed frontage and right-of-way improvements will be added to the existing properties after project construction.
- e. *Building Height Limitations* - The maximum building height in the Commercial zoning district is 55 feet. The design review narrative from the applicant states the building will be less than 30 feet in height, which would be less than the maximum height requirement for the zone.

CONCLUSION: The application will meet the dimensional standards identified in Chapter 14.38 and 14.48 LSMC.

10. LSMC 14.72 Parking:

- a. *Spaces Required*-Table 14.38 sets forth the parking standards that are applicable to the project. A minimum of 2 stalls per 1,000 gross floor area (gfa) and a maximum of 4 stalls per 1,000 gfa is required per LSMC 14.38.060.
- b. The initial site plan proposed 802 parking stalls with an approximate 169,000 square foot building or 4.73 parking stalls per 1,000 gfa, which exceeded the maximum allowed per the municipal code. The parking needs assessment from Kittelson & Associates dated May 6, 2019 (**Exhibit 1**) provided appropriate justification for exceeding the maximum (up to 25%) in accordance with LSMC 14.38.060(c) – Modifications.
- c. The revised site plan provided to the city on October 31, 2019 proposed 809 parking stalls with a 158,755 square foot building or 5.09 parking stalls per 1,000 gfa. The revised site plan provided to the city on March 23, 2020 proposes 836 parking stalls with a 158,721 square foot building or 5.27 parking stalls per 1,000 gfa. LSMC 14.72.010(a) states that all developments (other than in the CBD) shall provide a sufficient number of parking spaces to accommodate the number of vehicles that ordinarily are attracted to the development in question. Costco demonstrated via their parking needs assessment that it is providing the number of parking stalls needed to accommodate its patronage. The proposed parking exceeds the 20% modification allowed by the Planning Director per LSMC 14.16C.120(d); however, LSMC 14.72.020 allows more flexibility to permit deviations from the parking standards. As part of the development agreement, the City Council authorized the maximum amount of parking at 900 stalls as set forth in the agreement.
- d. *Parking Space and Aisle Dimensions*- All the proposed parking stalls meet the standard parking stall dimensions. All aisle widths meet or exceed the minimum 24 feet for two-way traffic.
- e. *ADA* – The project is proposing 18 accessible parking stalls, exceeding the minimum of 16 required by code. Three of the stalls will be Accessible Van Stalls which meets the minimum required by code.
- f. *Bicycle Parking Facilities*- The applicant’s revised design review narrative stated they will provide bicycle racks near the entrance to each building, thus meeting the LSMC 14.72.110

code requirements. The site plan submitted with the building permit and construction plans show these on the plans.

CONCLUSION: The proposed site layout as conditioned meets the parking requirements of the LSMC 14.72.

11. LSMC 14.76 Screening and Tree Retention and Protection:

- a. *Screening*- A minimum 5-foot landscape buffer, Type C screen, along the side and rear property lines is required per LSMC 14.38.040 footnote #7. The proposed preliminary landscape plan and site plan shows compliance with this requirement.
- b. *Significant Trees*- The applicant provided an arborist report by American Forest Management, Inc. Significant Tree Inventory, March 27, 2018 (**Exhibit 12**). For significant trees removed on the project site, Costco will mitigate the removal through a combination of on-site replanting, off-site replanting, and contribution to the city's tree mitigation fund. Consistent with the requirements of LSMC 14.76.120, Costco will mitigate the removed 1,814 significant trees at a 3:1 ratio. The submitted preliminary landscape plan shows that approximately 1,714 replacement trees will be provided on site, 540 replacement trees will be provided in the SR-9 right-of-way and 3,188 replacement trees will be mitigated through a combination of off-site replanting and tree fund contribution. An additional 167 trees will be planted as part of the wetland mitigation for the project.
- c. *Shade Trees in Parking Areas*- Shade trees are required to be planted in and around new parking lots, so that 20 percent of the vehicle accommodation area will be shaded. The revised preliminary landscaping plan (Sheet L-2) adequately provides the calculations and shade trees within the proposed vehicle accommodation areas. City code also requires that parking areas be broken up by trees/plantings every 10 stalls as per LSMC 14.38.060, Note 5d (4) and (5). The applicant provided additional planting islands in its revised plans to achieve compliance with this requirement. The project is providing landscaping and trees throughout the site and parking lot and is including rain gardens in the site design.

CONCLUSION: The proposed project meets the screening and tree retention and protection standards of LSMC 14.76.

12. LSMC 14.88 Critical Areas:

The project contains seven (7) wetlands. Approximately a total of 1.72 acres of Category II and Category III wetlands will be directly impacted by the project for the development of the warehouse and associated road infrastructure. In addition, 2.23 acres of wetland will be impacted as "paper fill" to provide a 220-foot buffer as requested DOE to mitigate for road construction impacts to Wetlands A & D. In addition, the site plan was revised in January of 2020 to avoid Wetland F through reconfiguration of the site layout.

The wetlands are discussed in the *Critical Areas Report* by Sewall Wetland Consulting, Inc. (**Exhibit 12**). Wetland mitigation for the project's wetland impacts includes a combination of on-site wetland creation and enhancement, "paper fill" to provide additional buffer areas, , participation in a wetland mitigation bank, and assuming landowner approval is obtained, off-site improvements to a tributary of Mosher Creek. This mitigation strategy arose from discussions with the City of Lake Stevens, the US Army Corps of Engineers (USACE), WSDOT, DOE, WDFW, adjacent property owners, and the Tulalip Tribes with the goal of protecting fish habitat in Mosher Creek and its tributary. The applicant sent the JARPA application to the USACE and the DOE. As

part of the JARPA process, the USACE consults with numerous other agencies on the application including but not limited to the US Environmental Protection Agency, US Fish & Wildlife, National Marine Fisheries Service and other federal, tribal, state, and local agencies. The city's consultant, the Watershed Company has reviewed and commented on the mitigation strategy as originally submitted and revised by the applicant (September 10, 2019, September 17th, 2019, January 20, 2020, February 15, 2020 and February 10, 2020). Their initial review commented on requiring a culvert sizing analysis, hydrologic conditions, the proposed wetland buffer sizes, reduction of impacts to Wetland F, and several inconsistencies in calculations. The revised mitigation plans for the project have addressed most of these comments. The Watershed Company in its Technical Memorandum dated March 13, 2020, commented for the correction of several inconsistencies across all project documents and made recommendations for certain performance standard clarifications. Those comments and recommendations have been accepted and incorporated into the final wetland mitigation strategy (**Exhibits 12.A.4-6**).

More specifically, the proposed mitigation for the proposed 1.72 acres of wetland impact as well as 2.23 acres of wetland impact for conversion to wetland buffers will include three separate mitigation measures as shown in the attached Sewall Wetland Consulting, Inc. *Critical Areas Mitigation Plan Lake Stevens Costco and Costco Bank Use Plan*, both dated April 6, 2020 (**Exhibit 12**):

1. Purchase of 3.044 credits in the Snohomish Mitigation bank to mitigate for 1.72 acres of wetland impact as well as 2.23 acres of wetland impact for conversion to wetland buffers (paper fill). This will mitigate all the impacts from the proposed project.
2. Removal of three (3) fish barrier culverts off-site to a Mosher Creek Tributary, and the replacement of three (3) other culverts with fish passable culverts. The existing culvert along the east side of SR 9 will also be replaced with construction of the roundabout. Enhancement plantings will be provided along 17,733 sf of the off-site stream buffer in the vicinity of the culvert improvements.
3. Creation of 0.45 acres of wetland/fish habitat along Wetland D.

Tentatively, the city has received support and participation on the wetland mitigation strategy from the landowners south of the site (where the off-site culverts are slated for removal/replacement). The city and applicant are in the process of executing temporary construction easements and mitigation easements with these landowners. The removal and replacement of the six off-site culverts is a voluntary mitigation measure by Costco and is not a city critical areas code requirement. This optional mitigation will be reviewed by Snohomish County as it is located within the county, rather than within city limits.

Wetland D is a headwater to a small tributary to Mosher Creek. Maintaining the overall size, hydrologic inputs and connection to the tributary from this wetland is highly desirable. Wetland D is a Category II wetland and city code requires a 3:1 ratio for Category II wetland impacts. The applicant is proposing on-site wetland creation and enhancement as mitigation, paper fill for buffer impacts, and the remainder of wetland impact will be mitigated through wetland mitigation bank credits. This allows enhancement of fish habitat to benefit the downstream tributary. As described previously, off-site wetland mitigation bank credit purchase, will be utilized to mitigate for the proposed wetland fill and paper fill for buffer. These are the preferred methods of mitigation by both the US Army Corps of Engineers and DOE.

In addition, Costco will employ innovative site design using low impact stormwater techniques as an additional mitigation measure that includes directing clean roof runoff back to critical areas to maintain site hydrology and constructing a series of swales and rain gardens throughout its parking lot. The applicant's proposed mitigation will maintain water quality and quantity per the 2014 Department of Ecology (DOE) Stormwater Management Manual for Western Washington (Stormwater Manual) that was designed to be protective of salmonids. A final wetland mitigation plan will be submitted with the 100% construction drawings under a separate permit. Please see **Exhibit 12** of this document for a list of all the critical area studies and reports prepared for the project to date.

The applicant is preserving stream and wetland functions by the removal/replacement of six culverts along the unnamed tributary, creation/enhancement of Wetland D area and removing a house, garbage, and failing septic system that are currently contributing to degraded water quality in Wetlands A and D. Remaining and enhanced critical areas will be placed in Native Growth Protection Areas in tracts on the binding site plan or in Native Growth Protection Area Easements. Costco will own the stormwater and wetland mitigation tracts until construction is completed, at which time Costco will convey the stormwater and wetland tracts to the city pursuant to the terms of a separate purchase and sale agreement.

The applicant also has prepared a Biological Evaluation (BE) that addresses potential impacts to endangered species under the federal Endangered Species Act, Magnuson-Stevens Fishery Conservation and Management Act, and the 1996 Sustainable Fisheries Act. The applicant also prepared two Recommended Culvert Sizing Analyses to address fish passage for the SR-9 Roundabout and Mosher Creek tributary.

The BE states that no listed species or critical habitat are present within the Action Area (more than a mile from the site). Conservation measures employed during construction are expected to protect aquatic habitat downstream where listed species (Chinook, bull trout, and steelhead) are found. Over the long-term, the project will employ current stormwater management techniques as part of a regional system to protect downstream habitat. Six fish-blocking culverts will be made fish passable. The proposed action with listed conservation measures will have no effect on Chinook salmon, steelhead, or bull trout; and will not adversely impact critical habitat for any listed species.

Potential Essential Fish Habitat (EFH) is found in proximity to the project site for Coho rearing and overwintering habitat. Potential impacts to habitat and proposed conservation measures to avoid, minimize, and mitigate impacts are described in the BE. Based on the analysis, it is expected that implementation of the proposed action will adversely affect existing EFH for salmonid species. Adverse effect as defined under the MSA "means any impact which reduces quality and/or *quantity* of EFH". Adverse effects will be minimized by construction measures and are mitigated by opening additional headwater habitat including a headwater wetland currently blocked by numerous culverts. With these mitigation measures, long term adverse effects are reduced or avoided.

As stated previously, best available science is a concept that is incorporated into local development regulations (particularly critical areas regulations) and comprehensive plans. The city utilized best available science when it adopted its GMA-compliant development regulations. Similarly, best available science is incorporated into the Department of Ecology's stormwater and wetland regulations and into the Department of Fish and Wildlife's fish passage design recommendations.

On behalf of the city, The Watershed Company has conducted a peer review of Costco's critical area studies. This provides an impartial third-party review of Costco's consultant's studies against city, state, and federal regulations pertaining to critical areas. See paragraph two of this section for more information regarding their review.

In addition, the city hired ESA (Environmental Science Associates) to assist the city with permitting for the SR-9 culvert replacement.

LSMC 14.88.010 - Avoidance, Minimization, Reduction, and Compensation.

Under LSMC 14.88.010, an applicant shall all make all reasonable efforts to avoid and minimize impacts to critical areas and buffers in the following sequential order of preference:

1. Avoiding impacts altogether by not taking a certain action or parts of an action; or
2. When avoidance is not possible, minimizing impacts by limiting the degree or magnitude of the action and its implementation, using appropriate technology, or by taking affirmative steps, such as project redesign, relocations, or timing, to avoid or reduce impacts and mitigating for the affected functions and values of the critical area; and
3. Reducing or eliminating impacts over time by preservation and maintenance operations during the life of the action.
4. Compensating for unavoidable impacts by replacing, enhancing or providing substitute resources or environments.

The applicant's revised Avoidance, Impacts, and Mitigation Report dated April 6, 2020 includes a response to each of the criteria above (**Exhibit 12.A.4**). The applicant has also provided an extensive siting analysis titled *Alternatives Analysis for Costco Wholesale, Lake Stevens* dated February 10, 2020 for the USACE Corps Permit that shows that eight alternative sites were analyzed for the location of this project. The analysis evaluates each alternative site, demonstrates the need for the project, the site requirements for a Costco facility, the on-site location analysis, wetland mitigation strategies, and the need for the off-site road and stormwater projects. The applicant considered a "No Action" alternative and "On-Site" alternatives in its analyses.

The analysis concludes that total avoidance would render the project infeasible. Since avoidance is not possible, the applicant focused on minimizing the impacts by designing the site to minimize impacts to the most sensitive areas of the site (Mosher Creek and Wetland M). Some buffer impacts to the buffer of Wetland M will occur from the road construction of 91st Avenue SE because the road's grade must match up to that of the intersection to the north. Buffer impacts have been reduced through increasing slope steepness to reduce temporary impacts. Impacts will be mitigated through buffer averaging and restoration. The site plan was revised again in late 2019 in order to avoid impacts to Wetland F. Wetland mitigation for the project's wetland impacts includes a combination of on-site wetland creation and enhancement, "paper fill" to provide additional buffer areas, off-site improvements to a tributary of Mosher Creek, and participation in a wetland mitigation bank, and assuming landowner approval is obtained, off-site improvements to a tributary of Mosher Creek. This mitigation strategy arose from discussions with the City of Lake Stevens, the US Army Corps of Engineers (USACE), WSDOT, DOE, WDFW, adjacent property owners, and the Tulalip Tribes with the goal of protecting fish habitat in Mosher Creek and its tributary. The project will have some unavoidable wetland and stream impacts; however, these have been minimized to the extent practicable through careful consideration of the site configuration and reconfiguration to the site layout.

CONCLUSION: The application meets all applicable regulations regarding critical areas as mitigated and conditioned.

13. LSMC 14.110 Concurrency Management and LSMC 14.56 Streets and Sidewalks:

LSMC 14.112 - *Transportation* - establishes mitigation requirements for traffic impacts to Lake Stevens' roads from development.

Background

The project is located at the northwest corner of SR 9 and South Lake Stevens Road. The *20th St SE Corridor Subarea Plan and EIS* identify specific improvements to the road network that are necessary as a result of growth and which were assumed in the transportation analysis to maintain the level of service for the corridor. These include the widening of 20th Street SE (under design as a separate project); construction of a new 24th Street SE (paralleling 20th Street SE, between Cavalero Road), a new 4-legged roundabout at SR-9 /South Lake Stevens Road/24th St SE, a new signalized intersection at 24th St SE approximately 400ft west of the new SR9 roundabout, 91st Avenue SE extension between 20th Street SE and 24th Street SE, realignment of South Lake Stevens road west of SR9 to connect with the new 24th St SE, and sidewalk improvement to 79th Avenue SE (between 20th Street SE and 24th Street SE (under Right-of-Way acquisition and design as a separate project).

Pursuant to Chapters 35.77 and 47.26 RCW the city prepared and adopted its 2014-2019 Transportation Improvement Plan (TIP), consistent with the Capital Facilities Element of the city's Comprehensive Plan, which includes two new collector road connections: 91st Avenue SE from 20th Street SE to 24th Street SE and 24th Street SE from 91st Avenue SE to State Route 9 (SR9). Extensive coordination on the design of the roads has occurred with the City of Everett, Snohomish County, and WSDOT.

Traffic Analysis

The final traffic impact analysis report from TSI dated October 26, 2018 (**Exhibit 12.B.2**) documents the traffic impacts associated with the development of the project and identifies traffic impacts from the project and outlines potential improvements to address those impacts. This traffic analysis forecasts and evaluates future conditions through year 2025. The project is proposed to generate approximately 799 new PM peak hour trips. The initial design of the roadway improvements has included significant coordination between Costco, the City of Lake Stevens, Tulalip Tribes, US Army Corps of Engineers, WA State Department of Transportation (WSDOT), WA State Department of Ecology, WA State Department of Fish and Wildlife, City of Everett and Snohomish County.

With the completion of the projects identified in the city's capital facilities plan, the transportation system will operate within the adopted levels of service for the 20th St SE Corridor.

- *Table 1: From TSI's Traffic Impact Analysis, dated Oct 2018, Page 28, Table 10.*

• Intersection	• Control	• LOS	• Delay	• PM Vol
• 79th Ave/20th St	• Signal	• B	• 25.4	• 2,230
• 83rd Ave/20th St	• Signal	• A	• 7.3	• 2,113
• 91st Ave/20th St	• Signal	• A	• 16.7	• 2,386
• SR 9/20th St	• Signal	• C	• 51.7	• 3,926
• 99th Ave/20th St	• Signal	• A	• 9.2	• 1,776
• S Lk Stevens Rd/20th St	• Signal	• B	• 16.9	• 2,003
• Corridor LOS	•	• C	•	• 25.3

The roads will meet the concerns of the various agencies. Roads have been designed to minimize direct impacts to wetlands, retain appropriate transitions between local and state roads, ensure safe traffic flow between city and county roads, and protect the city of Everett transmission waterlines.

The applicant submitted several traffic studies and reports for the project and coordinated with several agencies including the city, Snohomish County, and WSDOT. **Exhibit 12** provides a list of all the transportation studies/reports prepared for the project to date.

As detailed in the traffic analysis, all study intersections are forecasted to operate within the City of Lake Stevens, WSDOT and Snohomish County standards and LOS, except for the intersection of SR 9 at the US 2 eastbound ramps as improved. Costco is coordinating with WSDOT directly in determining appropriate strategies or proportional mitigation measures as needed to SR 9 at the US 2 westbound off-ramp and Bunk Foss Road.

The traffic analysis did not include the US 2, SR 204, and 20th St SE intersection. The design and construction of these intersections are being analyzed by WSDOT under the project title "SR-9/SR-204 Intersection Improvement, Stage 1, 2, and 3." Projects are funded by Connect Washington. Stage 1 was completed in summer of 2019. Stage 2 is planned for construction in summer of 2020. Stage 3 is planned for construction in summer of 2021. Funding for Stage 2 and 3 is tied to Initiative-976, and its fiscal impact is yet to be determined by the state legislature.

The proposed roundabout on SR 9 at 24th Street SE and S Lake Stevens Road is forecast to continue to operate at LOS B. Like without-Project conditions, with-Project conditions at this intersection meet the WSDOT LOS thresholds and are consistent with the conclusions from the Intersection Control Evaluation (ICE) report.

With the project, S. Lake Stevens Road at 24th Street SE is evaluated as a signalized intersection to support access to both the project (west access) and continued access to S Lake Stevens Road. The signal is forecast to operate at LOS B and meets the City of Lake Stevens LOS threshold.

Proposed Improvements

The following street improvements are consistent with the City of Lake Stevens 20th Street SE Corridor Subarea Plan.

1. 24th Street SE

- 24th Street SE will be completed from SR 9 to 91st Ave SE. 24th Street SE will be a three-lane roadway, with a multi-use path and landscaping strip along the north side of 24th Street SE.
- The easterly access off 24th Street SE was evaluated as a stop-control, with restricted Right-in Right-out access, while the westerly access along 24th St SE will be evaluated as signal control. Both configurations show the access operating at LOS D. Though signal control is not required per the TIA prepared by TSI at the westerly access of 24th St SE for the project build-out, a signal will be constructed to better support access at South Lake Stevens Road and 24th Street SE. This signalized intersection will have left turn lanes on all approaches. The left turn storage length for both eastbound and westbound legs along 24th St SE are 150 ft respectively; 100 ft for the northbound leg along the realigned South Lake Stevens Road. A 200-foot left turn lane storage capacity exiting from the site will be provided.
- Vehicle queues on 24th Street SE are not forecasted to impede traffic flow between the signalized intersections at SR 9 and at this access and South Lake Stevens Road.

- The east access off 24th Street SE is a right-in/right-out access with a direct route to the fueling station. Impacts at this site access are negligible with the project.

2. 91st Ave SE

- The signalized intersection at 20th Street SE and 91st Ave SE will be modified to accommodate the new south leg.
- 91st Ave SE will be extended south of 20th Street SE to 24th Street SE continuing its function as a north/south collector as identified in 20th Street SE Subarea Plan, and Lake Stevens Comprehensive Plan.
- The new 91st Ave SE extension will be a three-lane roadway with a dedicated northbound left-turn lane for approximately 150-feet, and a dedicated right turn lane at 20th Street SE intersection. This configuration shall accommodate for future turning movements onto 20th St SE.
- The northerly access off 91st Ave SE is intended as a primary ingress/egress to the site. The site access is forecast to operate at LOS B with the Project.
- The southerly access off 91st Ave SE is intended as a private truck access to the back of the warehouse. Impacts at this access site are negligible with the project.

3. South Lake Stevens Road

- A section of South Lake Stevens Road will be vacated west of SR 9 and terminated as a hammerhead. In coordination with Snohomish County, a new section of South Lake Stevens road has been designed and will be constructed to connect to 24th Street SE.
- During the review process, this new section connecting the city's and Snohomish County's portions of the road was redesigned at the request of Snohomish County to accommodate better traffic control.
- The redesign considered the impacts to wetlands and traffic circulation. The design meets both jurisdiction's standards, and the analysis of AM impacts at intersections.
- The re-alignment has a slight increase to wetland impacts but creates more connectivity to Wetland D restoration/enhancement efforts. Final layout will be part of the construction plan review as a separate permit.

4. SR9 and 24th Street SE / South Lake Stevens Road intersection.

- The 20th Street SE Corridor Plan identified the need for an intersection to facilitate better traffic control and provide connectivity on both sides of SR-9.
- Multiple configurations were evaluated including restricted access, a signalized intersection and a roundabout. The TSI report evaluated each alternative for function compatibility with the local level of service and potential impacts to the state highway.
- In coordination with WSDOT, a multi-lane roundabout was the preferred intersection.

Design and Connectivity

24th St. SE and 91st Ave SE were designed to minimize impacts to adjacent wetlands by eliminating the planter strip and sidewalk on the south side of 24th St SE and the west side of 91st Ave SE. A 10-foot wide multi-use path and five-foot wide planter strip with trees will be constructed on the north side of 24th St

SE and on the east side of 91st Ave SE. A sidewalk connection will also be constructed on the northeast corner of the roundabout to effectively link the S. Lake Stevens Road multi-use pathway (when fully constructed) across SR-9 through the site and up 91st Ave SE to connect to future pedestrian connections on 20th St SE and 91st Ave SE.

These road and sidewalk improvements are consistent with the City of Lake Stevens 20th Street SE Corridor Subarea Plan. Following construction, portions of the project will be dedicated to the city for public purpose as outlined in the development agreement. Slight modifications of the preliminary plans and reports may change as the design progresses. Final construction plans will be submitted for review under a separate application.

Traffic Impact Fees

To mitigate for traffic impacts, the development of the site requires the payment of traffic impact fees pursuant to Chapter 14.112 LSMC. The applicant will construct road improvements as part of the project. The applicant's construction of off-site improvements will receive credits against their traffic impact fees per LSMC 14.112.090. The costs of construction for portions of the off-site improvements shall be an offset against the amount of transportation mitigation impact fees otherwise due as identified in the development agreement. Traffic impact fee credits include the existing single-family home being removed from the site.

CONCLUSION: The application meets the concurrency test for transportation. The application also meets the streets and sidewalk standards identified in Chapter 14.56 LSMC and in the current Engineering Design & Development Standards. The application as conditioned meets the impact fee standards.

14. LSMC 11.06 Stormwater: The applicant submitted a *Preliminary Stormwater Drainage Report* prepared by DOWL Engineering, Inc., on September 18, 2019 (**Exhibit 10**) with its binding site plan application which was reviewed and approved by the city's Stormwater Engineering Technician. The project's stormwater facilities are being designed to the 2014 Department of Ecology (DOE) Stormwater Management Manual for Western Washington (SWMMWW). The Preliminary Stormwater Drainage Report will be revised in coordination with the critical area's evaluations and low impact development design decisions and will inform the Final Stormwater Drainage Report. A Final Drainage Report meeting all city and state requirements, including a LID feasibility analysis, will be provided by the applicant prior to the issuance of a construction permit.

The following stormwater improvements are proposed for the project and are included in the preliminary stormwater drainage report:

- Flow control for the entire Costco site and the new roadways will be mitigated with the new detention pond constructed on the south side of 24th Street SE. The detention pond will outfall to existing forested land upgradient from Mosher Creek.
- DOE approved enhanced water quality treatment will be used to treat stormwater runoffs generated from on-site improvement and new roadways construction, prior to discharging to the detention pond.
- Low Impact Development (LID), such as bioretention cells, will be included in the project as much as feasible to treat runoffs generated from parking lot. Rain gardens are proposed in the warehouse parking lot to provide LID water quality treatment.

- Groundwater flowing north to south will be collected and conveyed through cutoff trenches and underdrains, for treatment and detention, prior to discharging to wetlands on the south side of 24th Street SE. Discharge rate will mimic the existing hydrology recharge rate.
- Existing wetlands on the south side of 24th Street SE will be maintained and enhanced by the project. A portion of clean roof runoff will be discharged to the wetlands to mitigate for contributing predeveloped surface runoff.
- An oil water separator will be provided for the fuel station which will discharge to the sanitary sewer system.
- A soil amendment Best Management Practice (BMP) will be used in the proposed landscaping.

In addition, as stated above, Costco will employ innovative site design using low impact stormwater techniques as an additional mitigation measure that includes directing clean roof runoff back to critical areas to maintain site hydrology and constructing a series of swales and rain gardens throughout its parking lot. Staff recommends a condition of approval that the applicant field verify that the proposed dispersion trenches match the existing discharge characteristics.

15. LSMC 14.60 Utilities:

The project includes several significant infrastructure improvements for stormwater, water and sewer. The applicant provided preliminary civil plans with the site plan application (**Exhibit 1c**).

- Sewer* - A regional sewer lift station is proposed in the southwest corner of the site, that would provide sanitary sewer capacity to serve the immediate 30 acres, in addition to providing sewer capacity to other residential and commercial properties. Sewer line will be constructed in 91st Ave SE and 24th Ave SE and, in coordination with the Lake Stevens Sewer District, be extended east across SR-9 to allow future sewer capacity in the area. In association with the lift station, there will also be a gravity force main and gravity line that will flow down to the lift station and be pumped up to 20th St SE where it will be connected to the city's existing sewer lines. The most significant advantage to constructing a regional sewer lift station is reducing the number of septic drain fields and providing the ability for future development or replacement projects to hook into the sanitary sewer system. The proposed project was reviewed and approved by the sewer district; they have indicated sufficient capacity to serve the project. As noted, the project will expand sewer availability in the area with the construction of the sewer lift station, gravity line and force mains, and the extension of sewer line across SR-9 in conjunction with the Lake Stevens Sewer District.
- Water* - The project is proposing to extend water mains down 91st Ave SE and along 24th St SE. The applicant is coordinating with Snohomish County PUD on all applicable water line work.
- Everett* - The city has been coordinating with the city of Everett on the crossing of 91st Ave SE over their underground water pipelines. As a result, an approximate 150-foot long portion of the pipelines will be replaced at this location to mitigate impacts from the construction to the water supply and ensure long-term viability of the lines. The two cities executed an Interlocal Agreement regarding the transmission line replacement on January 31, 2020.
- Electric* - The applicant has been coordinating with Snohomish County PUD in providing electric facilities to serve the site.
- Garbage Service* - Costco is proposing consolidated solid waste, compactor, and loading areas, in the southwest corner of site. The location is located near 91st Ave SE but will be screened

by a 15-foot-wide landscape bed. Costco's approach for dealing with garbage is to use compactors that are entirely enclosed and filled via chutes from inside the building. Trucks will pick them up and return them. No garbage will be visible to the public.

CONCLUSION: The application will be serviced by adequate utilities.

16. LSMC 14.84 Fire Code:

The Fire Marshal has reviewed and recommended approval of the land use permits deferring further detailed comments to construction plan review. The application meets the requirements for emergency access and protection.

CONCLUSION: The application as conditioned will meet applicable fire code requirements for the application.

17. LSMC 16.04 SEPA:

The Costco Property is within the area described in City Ordinance No. 878, which approved a SEPA Planned Action for the City's 20th Street SE Corridor Subarea, pursuant to RCW 43.21C.031. The Planned Action Ordinance and supporting documentation addressed the environmental impacts associated with development within the 20th Street SE Corridor Subarea in order to facilitate and expedite the environmental review of future individual development projects. The development of Costco is an implementing project for purposes of the Planned Action Ordinance.

For this project there are a series of four related actions requiring a phased SEPA approach as allowed under WAC 197-11-060 and WAC 197-11-776 to evaluate general matters in broader environmental documents (Subarea Plan and Planned Action), with subsequent narrower documents concentrating solely on the issues specific to the later analysis (24th Street SE and SR9 Intersection):

- Construction of the Costco Warehouse and related infrastructure improvements.
 - Construction of the public roads of 91st Ave SE and S. Lake Stevens Road Connector.
 - Construction of 24th St SE.
 - Construction of the roundabout on SR-9.
- 1) The Costco property is within the Lake Stevens 20th Street SE Corridor Subarea for which a Planned Action EIS exists. Planned Action Certifications were issued for the Costco project and related public road improvements with the initial review of the Site Plan and Design Review based on consistency with LSMC 14.38.120 and Ordinance No. 878. The Planned Action Ordinance Certification covers the future building permit for the store, associated road improvements, binding site plan and development agreement. The city issued a Planned Action Certification for the Costco project on June 6, 2019 (**Exhibit 6a**).
 - 2) The city issued a Planned Action Certification to construct the public roads of 91st Ave SE and the S. Lake Stevens Road Connector on April 22, 2019 (**Exhibit 6b**). This project is consistent with the Lake Stevens Comprehensive Plan and the Capital Improvement Plan for the city. These roads were identified in the 20th St. SE Corridor Subarea EIS as additional improvements needed to the road network that are necessary as a result of growth and which were assumed in the transportation analysis.

- 3) As 24th Street SE was not included in the Planned Action Ordinance, a separate SEPA threshold determination (MDNS) was issued on April 22, 2019 as an early action for road improvements (**Exhibit 6c**). As an early action to review potential cumulative impacts the MDNS notice stands as the Notice of Application and decision per LSMC 14.16B.430 for a combined notice and comment period. The MDNS was not appealed and stands as issued. Pursuant to WAC 197-11-510 and Chapter 16 LSMC, the MDNS notice was provided according to standard procedures.
- 4) WSDOT will conduct SEPA review on the SR9 Roundabout and issue a separate threshold determination. Replacement of the culvert east of SR-9 requires a Nationwide permit from the US Army Corps of Engineers. Development of the Costco site requires an Individual permit from the US Army Corps of Engineers. The US Army Corps of Engineers will ensure NEPA compliance during their review of the applied for permits. Thus, these environmental determinations will be forthcoming after thorough state and federal agency review of the proposed project.

Pursuant to RCW 36.70B.170(3)(c), the development agreement addressed the mitigation measures, development conditions, and other requirements under Ch. 43.21C RCW that are applicable to the development. Pursuant to RCW 43.21C.240(2) & (3), the city finds that the mitigation measures in the development agreement and the analyses and mitigation required by other local, state, and federal laws and regulations provide adequate analysis of, and mitigation for, the identified environmental impacts of the development. The city evaluated the collective and cumulative impacts of the first three actions listed above through a phased SEPA approach. As also set forth in the development agreement, the city may require further SEPA review and mitigation only to the extent that an implementing entitlement approval or requested modification meets the following conditions:

- i. The city concludes that a requested entitlement application is likely to cause unmitigated, significant, adverse environmental impacts that have not been previously analyzed in the Planned Action process or other SEPA environmental documents; or
- ii. The city concludes, pursuant to WAC 197-11-600(3)(B), that substantial changes have been made to the development proposal that are likely to have significant, adverse impacts that have not been previously analyzed in the Planned Action process or other SEPA environmental documents; or
- iii. As otherwise required by RCW 43.21C.440 and WAC 197-11-169 and WAC 197-11-172.

The public roads of 91st Ave SE and 24th St SE have been intended to be constructed since 2012 as set forth in the city's transportation element, 20th St SE Corridor Subarea Plan, and the city's 6-year TIP. When the Costco project started, the city was already moving these road construction projects forward whether Costco or another development occurred. As such, the city issued both the SEPA MDNS for 24th St SE and the Planned Action Certifications for 91st Ave SE and the S. Lake Stevens Road Connector as early actions for the road improvements. As coordination with Costco progressed, development of the site, city roads, and improvements to SR-9 became codependent and the responsibility for permitting, construction, ownership and maintenance became complicated. Agreements with the City of Everett, Lake Stevens Sewer District, Puget Sound Energy, Snohomish PUD, and WSDOT have been or will be executed to identify and clearly define the responsibilities as described above.

Nothing in WAC 197-11-310 prevents a lead agency, when it is a project proponent or is funding a project, from conducting its review under SEPA or from allowing appeals of procedural determinations prior to submitting a project permit application. The threshold determination shall be made as close as possible

to the time an agency has developed a proposal per WAC 197-11-310. Per WAC 197-11-330, an agency may issue a determination on a project once an evaluation of the checklist has been completed. The city issued the determination for 24th St SE as per WAC 197-11-330 and a 14-day public comment period on the MDNS was provided in accordance with WAC 197-11-502(3).

CONCLUSION: The application meets the SEPA standards under state law.

18. Conclusions

- Costco has met the procedural requirements for site plan review, design review, binding site plan, and administrative deviations as set forth under the following applicable sections of the LSMC: 14.16C.105, 14.16C.050, 14.18 – Part II, 14.16C.120 and LSMC 14.68.124.
- The proposed project is consistent with the city's Comprehensive Plan and the 20th St SE Corridor Subarea Plan. The southwest corner of SR-9 and 20th Street SE is explicitly identified in the subarea plan as a location for a retail center that could include big box retail.
- The layout and design of the site and warehouse/fueling facility is consistent with the city's site plan regulations and design review guidelines for the 20th St SE Corridor.
- Through an iterative public and agency review process, the site layout was revised numerous times. The final site layout preserves the most sensitive natural areas of the site (Mosher Creek west of 91st Ave SE, Wetlands A, D, and F) and incorporates innovative design such as capturing clean roof stormwater runoff to rehydrate the wetlands, bioretention cells, and rain gardens.

D. **DECISION AND CONDITIONS**

The Site Plan (LUA2019-0080), Design Review (LUA2019-0081), Binding Site Plan (LUA2019-0156) and the two administrative deviations for Costco are hereby **APPROVED, subject to the following conditions:**

1. The revised site plan submitted on March 23, 2020 (**Exhibit 3b**) provides the general layout of the site and offsite improvements for Costco. Any development of the site shall be in general conformance with the approved site plan unless modified per LSMC 14.16C.025.
2. The revised site plan and landscape plan provided on March 23, 2020 (**Exhibit 1b**) provides the general layout of the site's design and offsite improvements for Costco. The design review package revised on October 31, 2019 (**Exhibit 2a**) provides the building and fuel canopy elevations for Costco. Development of the site shall be in general conformance with the approved design review package and final site plan and landscape plan unless modified per LSMC 14.16C.025.
3. The revised binding site plan submitted on April 15, 2020 (**Exhibit 3b**) is the official subdivision map for LUA2019-0156. Any development of the site shall be in general conformance with the approved binding site plan unless modified per LSMC 14.18.170.
4. The applicant shall record with Snohomish County the approved binding site plan with a record of survey as one recording document complying with the requirements of LSMC 14.18.130 within one year of this decision. Copies of the recorded binding site plan documents shall be provided to the city.
5. Development of the project shall conform to the Planned Action Certifications issued on June 6, 2019 and April 22, 2019 and the MDNS issued on April 22, 2019, all of which are adopted herein by reference.

6. The development of the overall site and the building design shall conform to the conditions of approval set forth by the Design Review Staff Report Recommendation (**Exhibit 9**).
7. The project plans shall be updated to reflect the changes associated with the administrative deviations.
8. Noise from the proposed development shall comply with the noise provisions set forth in the LSMC and the noise control provisions found in RCW 70.107.
9. The proponent or successor shall replace all significant trees removed during construction as identified on the final landscape plans or as amended and/or pay into the city's tree mitigation in-lieu fund.
10. The proponent or successor shall pay the costs of construction for portions of the offsite improvements as an offset against the amount of transportation mitigation impact fees as set forth in the executed development agreement.
11. The applicant shall coordinate with all applicable utility providers on the utility needs and required easements for the site.
12. All utilities shall be placed underground including any existing electric power lines per LSMC 14.60.450.
13. The applicant shall submit final construction drawings and reports that include but are not limited to traffic, stormwater, road profiles, etc. following applicable federal, state and local regulations for review and approval prior to construction.
14. The applicant shall field verify that the proposed dispersion trenches match the existing discharge characteristics.
15. Purchase of wetland mitigation bank credits shall be completed prior to the applicant's construction activities occurring. Proof of the mitigation transfer shall be provided in the form of a notification letter to the approving agency(s).
16. The proponent or successor shall replace all significant trees removed during construction as identified on the landscape and construction plans or as amended and/or pay into the city's tree mitigation in-lieu fund.
17. The Native Growth Protection Area Easements for Wetlands F and G shall be recorded prior to the recording of the Binding Site Plan.
22. Prior to the pre-construction meeting, the applicant shall provide the city with bonds, in the amounts approved by the city.
23. Prior to building permit issuance for any structure served by sewer or water, final approved plans by the sewer district and by Snohomish County PUD for water shall be submitted to the city.
24. The applicant or successor shall be compliant with the recorded development agreement with the city prior to commencing any construction and in all work performed under the provisions of the development agreement.

CITY OF LAKE STEVENS, DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

Decision Completed by*Melissa Place*

April 16, 2020

Melissa Place, *Senior Planner*

Date

Ordered*Russell Wright**April 16, 2020*Russell Wright, *Community Development Director*

Date

E. APPEALS

Interested parties may appeal the decision by submitting an appeal form and required fees to the City Clerk within 14 days of the date of decision. The appeal must identify the specific aspect(s) of the decision being appealed, rational for the appeal, and any supporting evidence, pursuant to LSMC 14.16B.710. The Hearing Examiner is the appeal body for administrative decisions.

F. EXHIBITS

1. Site Plan Package Received on April 30, 2019
 - a. Revised Site Plan Package Received on October 31, 2019
 - b. Revised Site Plan Received on March 23, 2020
 - c. Preliminary civil plans received on April 30, 2019, dated February 14, 2019
2. Design Review Package Received on April 30, 2019
 - a. Revised Design Review Package Received on October 31, 2019
3. Binding Site Plan Package received on September 19, 2019
 - a. Binding Site Plan map revised November 19, 2019
 - b. Official Binding Site Plan map revised April 15, 2020
4. Administrative Deviations Request received November 8, 2019, dated October 30, 2019
5. Letters of Completeness
6. SEPA Documents
 - a. LUA2019-0082 - Planned Action Certification Application for Costco – Application, Affidavit, Certification, Planned Action Checklist, SEPA Checklist, Email to Agencies, and Postcard
 - b. LUA2019-0068 - Planned Action Certification for the public roads of 91st Ave SE and S. Lake Stevens Road Connector – Application, Affidavit, Certification, Planned Action Checklist, SEPA Checklist, Email to Agencies, and Postcard
 - c. LUA2019-0069 - An MDNS for the construction of 24th St SE – Application, Affidavit, MDNS, SEPA Checklist, Email to Agencies, and Postcard
 - d. Planned Action Ordinance 878, September 24, 2012
 - e. 2012 Draft and Final 20th Street SE Corridor Subarea Plan Environmental Impact Statements (available at <https://www.lakestevenswa.gov/152/Subarea-Planning>)
7. Public Notification
 - a. Notice of Applications for the site plan, design review, and planned action certification - Affidavit, NOA publication, NOA Board, Email to Agencies, and Postcard
 - b. Notice of Public Meeting for site plan and design review – Notice and postcard

- c. Notice of Application for the binding site plan - Affidavit, NOA publication, NOA Board, Email to Agencies, Email to Interested Parties and Postcard
- 8. Public Meeting Sign-in Sheet
- 9. Design Review Recommendation dated April 10, 2020 – including exhibits
- 10. Public Comments
 - a. Agency Letters and Emails (received from April 22, 2019 to March 27, 2020)
 - b. All comments received (verbatim) by form (letters, emails, etc.) (received from April 22, 2019 to November 19, 2019) - available at <https://www.lakestevenswa.gov/380/Current-Planning>
 - c. Public Comments received after November 19, 2019
 - i. Comments Included in November 26, 2019 City Council packet
 - ii. Comments provided to the City Council at the November 26, 2019 meeting
 - iii. Comments received after the November 26, 2019 City Council meeting
 - iv. Comments provided to the City Council at the December 10, 2019 meeting
 - v. Comments received after December 10, 2019
- 11. Response Letters to Public Comments
 - a. City of Lake Stevens Summary Response to Public Comments for Costco dated November 19, 2019
 - b. Letter from City of Lake Stevens to Snohomish County dated November 19, 2019
 - c. Letter from Stoel Rives LLP to City of Lake Stevens dated November 8, 2019
- 12. Environmental Reports
 - A. Critical Areas
 - 1. *Costco Wholesale Lake Stevens – Critical Areas Report*, by Sewall Wetland Consulting, Inc. dated February 18, 2019, revised September 10, 2019
 - 2. *Costco Wholesale Lake Stevens – Habitat Report*, by Sewall Wetland Consulting, Inc. dated February 18, 2019
 - 3. *Costco Wholesale Lake Stevens – Impacts and Mitigation Report*, by Sewall Wetland Consulting, Inc. dated September 17, 2019, revised November 15, 2019 (received on November 21, 2019)
 - 4. *Revised Avoidance, Impacts and Mitigation Report* by Sewall Wetland Consulting, Inc., revised February 10, 2020, revised April 6, 2020
 - 5. *Costco Critical Area Mitigation Plan*, by Sewall Wetland Consulting, Inc. dated September 10, 2019, revised November 8, 2019, revised January 20, 2020, revised April 6, 2020
 - 6. *Mitigation Bank Use Plan Costco Lake Stevens and City of Lake Stevens 24th Street Extension Project NWS* by Sewall Wetland Consulting, Inc. dated January 25, 2019, revised September 10, 2019, revised October 17, 2019, revised November 15, 2019, revised February 10, 2020, revised April 6, 2020
 - 7. *Critical Area Exhibits* by Sewall Wetland Consulting, Inc. dated June 13, 2018
 - 8. *Costco Lake Stevens & SE 24th Street Extension – Alternatives analysis*, by Sewall Wetland Consulting, Inc. dated February 19, 2019
 - 9. *Alternatives Analysis for Costco Wholesale, Lake Stevens* by Sewall Wetland Consulting, Inc. dated October 21, 2019, revised February 10, 2020
 - 10. *Biological Evaluation*, Cedarock Consultants, Inc., dated August 13, 2019, revised February 21, 2020
 - 11. *Recommended Culvert Sizing Analysis - Lake Stevens Road at SR-9*, by Cedarock Consultants, Inc., dated March 26, 2019
 - 12. *Recommended Culvert Sizing Analysis – Mosher Creek and Tributary*, by Cedarock Consultants, Inc., dated August 14, 2019
 - 13. *Wetland and Stream Delineation Report 24th Street Southeast Extension* by The Watershed Company, dated September 7, 2017, revised May 30, 2018
 - 14. *Wetland and Stream Delineation for 39.74-Acre Aggregate Property Lake Stevens, WA*, by Altmann Oliver Associates, LLC dated September 21, 2012

15. *Lake Stevens Costco Peer Review of Critical Area & Culvert Design Documentation Technical Memorandum* by The Watershed Company, dated November 20, 2019
 16. *Lake Stevens Costco 2nd Peer Review of Wetland Mitigation* by The Watershed Company, dated March 13, 2020
- B. Traffic
1. *Costco Lake Stevens Draft Traffic Impact Analysis (TIA)*, by Transportation Solutions, Inc dated August 31, 2018
 2. *Costco Lake Stevens Final Traffic Impact Analysis (TIA)*, by Transportation Solutions, Inc dated October 26, 2018
 3. *24th Street/South Lake Stevens Road Intersection Control Evaluation Draft Report*, by Transportation Solutions, Inc. dated August 2018
 4. *SR-9, MP 13.80, 24th St SE/ South Lake Stevens Road Intersection Control Evaluation*, by Transportation Solutions, Inc. dated October 2018
 5. *Costco Lake Stevens Traffic Impact Analysis Simulation Analysis Findings Technical Memorandum*, by Transportation Solutions, Inc dated March 12, 2019, revised August 12, 2019
 6. *Costco Lake Stevens No Connection from 24th Street SE to S Lake Stevens Road Technical Memorandum*, by Transportation Solutions, Inc dated September 9, 2019
 7. *Costco Parking Needs Assessment*, by Kittelson & Associates dated May 6, 2019
- C. Stormwater and Drainage
1. *Preliminary Drainage Report for Costco Warehouse, Lake Stevens*, by DOWL Engineering Inc., dated September 18, 2019
 2. *Draft Stormwater Site Plan for Costco Warehouse, Lake Stevens*, by DOWL Engineering Inc., dated February 2020
 3. *24th Street Improvement Project Preliminary Stormwater Site Plan*, by Lochner dated January 2018
- D. Geotechnical
1. *Geotechnical Engineering Report*, by Terracon Consultants, Inc. dated May 29, 2018
 2. *Preliminary Geotechnical Report 24th Street SE Extension Lake Stevens, Washington*, by HWA GeoSciences Inc., January 15, 2016
 3. *Draft Geotechnical Report 24th Street SE Final Design*, HWA GeoSciences Inc. dated October 16, 2017
 4. *Draft Supplementary Geotechnical Report 24th Street SE Final Design*, by HWA GeoSciences Inc. dated April 12, 2018
 5. *Draft Geotechnical Report 24th Street SE and 91st Avenue SE Extensions*, by HWA GeoSciences Inc. dated April 9, 2019
- E. Cultural Resources
1. *Archaeological Survey and Assessment for the proposed Lake Stevens Costco Wholesale, State Route 9 and 20th Street Southeast*, by Caldera Archaeology dated May 5, 2018
- F. Trees
1. *Arborist Report 24th St SE Extensions – Lake Stevens*, by H.W. Lochner, Inc dated November 1st, 2017
- G. Other
1. *City of Lake Stevens 24th Street Extension Project Phase I Environmental Site Assessment* by Lochner, dated January 2018
- G. Distributed to the Following Parties:**
1. Applicant
 2. Parties of Record (list attached below)
 3. Interested Parties

Parties of Record List

Email

a.savfam.4@gmail.com	cikim6289@gmail.com
aaronhagel1@hotmail.com	cikim6289@gmail.com
abdontigny@hotmail.com	cindykshep@gmail.com
aldrichfamilyfarm@hotmail.co	ckpear81@gmail.com
ambbailey94@gmail.com	copelandtiffany@gmail.com
anbgibson86@gmail.com	corban.brent@gmail.com
andreina.gallegos@yahoo.com	courtney.spears@gmail.com
andykirkbride34@gmail.com	cristy98072@netscape.net
annmhowe@comcast.net	crootekrystal@gmail.com
anthonyarmenta69@gmail.com	crystallion720@gmail.com
bethdeitzel@yahoo.com	cyndifraser@gmail.com
BethMcBeth@hotmail.com	d.garthley@frontier.com
bill@liderengineering.com	dalvarez54@comcast.net
bobnjoan13@comcast.net	dambu26@gmail.com
bookie913@hotmail.com	DanPeterson7@msn.com
brian.stewart@actionintl.org	danyelleh@sierraind.com
bricklin@bnd-law.com	davidcurtc22@gmail.com
brookezueger@gmail.com	dcclay2@comcast.net
bsandt83@gmail.com	dchaire@comcast.net
bssboss@aim.com	dedicated41@msn.com
cachiefs24@yahoo.com	deegizmo@yahoo.com
cahill@bnd-law.com	dianahale@hotmail.com
campskagit@comcast.net	disdell08@gmail.com
capofigo@hotmail.com	djwerdal@comcast.net
capofigo@hotmail.com	dmarks@tulaliptribes-nsn.gov
carolynaegan24@gmail.com	DMcCormick@co.snohomish.wa.us
carter300zx@hotmail.com	dmero@yahoo.com
carter4396@gmail.com	dmyers4@alumni.nd.edu
caryleeallen@gmail.com	don@comptechplus.com
Cathy.Nelson@homestreet.com	doug.symonds@frontier.com
chadnott@hotmail.com	dougiec53@gmail.com
chrisdrich@gmail.com	dougiec53@gmail.com
chrispotterf@yahoo.com	dsmith4005@comcast.net
christian.williams329@gmail.com	ducati620girl@yahoo.com
	dwhitney2@aol.com

earldgrayjr@gmail.com
edpas2016@gmail.com
eduardourrutia@comcast.net
elainecstout@hotmail.com
elizards@gmail.com
ellrick@icloud.com
emmy@whiplawgroup.com
eric.minelga@gmail.com
es.schroedl@gmail.com
escalantejuang@gmail.com
even_luck@hotmail.com
fernald@hotmail.com
fjjames12@gmail.com
fxsm7@comcast.net
ginacats@gmail.com
glomassagebody@gmail.com
GMoen@everettwa.gov
gncgnc@protonmail.com
Gregory.Wied@Polyclinic.com
gsilsby@msn.com
gwmecham@gmail.com
hawkmomko@gmail.com
heather_brummer@hotmail.com
heidi.rodriquez@bastyr.edu
hermsen761@gmail.com
heygunny@yahoo.com
hudson1906@comcast.net
imannajjar@ymail.com
innochka_2004@yahoo.com
international1963@yahoo.com
ivy.taylor@gmail.com
j.j.enterprises@outlook.com
jackieolund1@outlook.com
jacobsontina@yahoo.com
jacobsontina@yahoo.com
jamesanderson221@live.com
jason@themccurrys.com
JBailey@everettwa.gov
jcipmaize@hotmail.com
jclittlebit@hotmail.com
jduffy216@comcast.net
jeffrey5679@me.com
jen.kira@gmail.com
jen@straightlinestripe.com
jennasampson@icloud.com
jenniferjaylin@yahoo.com
jenny@snohomishpieco.com
jennymiller926@gmail.com
jens.junkdrawer@yahoo.com
jewelz8a@gmail.com
jewelz8a@gmail.com
jlmyownmail@gmail.com
jmellein@comcast.net
jmtps91@comcast.net
jody.schauer@frontier.com
johnguz76@aol.com
johns.hovel@comcast.net
joiemette@hotmail.com
jonesmail@gmail.com
jonnyholme67@gmail.com
JordanSommerfeld@hotmail.com
josh.dewinter@gmail.com
jrcaleb84@hotmail.com
JRCARRICO@msn.com
JRCARRICO@msn.com
jrice_90@yahoo.com
JSwan@livebsl.com>
judy@AMERICANSPRINK.COM
judylorena42@gmail.com
juibarua720@gmail.com
justkcm@gmail.com
k9hohriver@yahoo.com
kaemont1951@gmail.com
karthda@icloud.com

kat@realnice.com
katgrant50@gmail.com
kdarrah86@gmail.com
kellileesehomes@gmail.com
kellyknauss@hotmail.com
kenneth@westcoastdevadvisors.com
kga@integra.net
kholderman3@gmail.com
kiptatum@gmail.com
klueverkyle@gmail.com
knelson@tulaliptribes-nsn.gov
kokushibyyou@gmail.com
kona-love@hotmail.com
kristy.cooper@fluke.com
kristy2cam@gmail.com
kristy2cam@gmail.com
ladybounty13@gmail.com
ladysnake828@yahoo.com
lake22@comcast.net
lanetter77@hotmail.com
laurae.divito@icloud.com
lauramiller22@gmail.com
lavonna.ihde@gmail.com
lazaranch@yahoo.com
lindajlchen@gmail.com
linlewhite@gmail.com
lisaannablack@gmail.com
Livpeterson1@outlook.com
liz_doyle@mssl.k12.wa.us
ljones777@gmail.com
loisjamieson@comcast.net
luckypj@juno.com>
luvcampg@gmail.com
m.pam@comcast.net
madelinespanitz@gmail.com
mamakatphotography@gmail.com
mamasande5@yahoo.com
marilyn.tennison@yahoo.com
mark.christianson68gmail.com
mark.m.baker@comcast.net
markschrier1972@outlook.com
marlonmonillas@yahoo.com
marshaschroeder@me.com
maryanngcraig@icloud.com
maryrand623@gmail.com
mcfly23@comcast.net
mcgrath01@gmail.com
mdickinsonster@gmail.com
Melissa@FortuneCo.com
meridianepfeifer@gmail.com
meyeraad@gmail.com
michaela.bryanne24@gmail.com
mikayla.morgan@live.com
mikejones777@gmail.com
mikeknotq@gmail.com
mikkilash@quidnunc.net
mikkilash@quidnunc.net
miranda.n.blum@gmail.com
mishelly_dawn@yahoo.com
mjoy.ferrier@gmail.com
mom_of_2@me.com
monika@efficientorganizationnw.com
mrlerch@gmail.com
mrsmomaj@yahoo.com
msaccessdeveloper@yahoo.com
msalantino@yahoo.com
murray.jill27@yahoo.com
mvonderau2@gmail.com
myaparsons30@gmail.com
nfinkeldei@gmail.com
nkastning@gmail.com
nol@nwfoss.com
nolanbates933@gmail.com
npsanchez@live.com

nyarlotep@comcast.net
paigejanderson@yahoo.com
patforster@comcast.net
pattylasell@yahoo.com
pattylasell@yahoo.com
pennyseek14@gmail.com
phillipsivan55@yahoo.com
phyllisschrier@gmail.com
phyllisschrier@gmail.com
pinklizzi85@gmail.com
pmyntti@comcast.net
poprox469@hotmail.com
r2akrs@gmail.com
raduagarvey@comcast.net
rainylivn@yahoo.com
rick.gimlin@gmail.com
robert_lh@hotmail.com
robinwa1@gmail.com
rocket@prodigy.net
rockinw1@frontier.com
roger.26@frontier.com
Roger.Eastman@tommybahama.com
roxlan@msn.com
rpalm32@yahoo.com
rrmyhill@outlook.com
ryclark85@gmail.com
s1monson@hotmail.com
sallyjosebring@frontier.com
samantha_werner@hotmail.com
saw326@icloud.com
schoedr@yahoo.com
seattlenative42@yahoo.com
sevenskies@comcast.net
shakahundo@broadstripe.net
Shannon.Fleming@co.snohomish.wa.us
shellymosbacker64@gmail.com
sheryl.losogmail.com
shirleykmann@yahoo.com
skarch13@gmail.com
slawlor@sno911.org
slbloom@kbhome.com
slbroze@gmail.com
smorris@gencare-inc.com
somesailor@gmail.com
ssantose@frontier.com
ssousa9@yahoo.com
Stephen.Dickson@co.snohomish.wa.us
steveheer@hotmail.com
steves@johnlscott.com
stlhrsdrmr@comcast.net
suecristan@gmail.com
sueruns@hotmail.com
suki513@yahoo.com
surgeon25june@gmail.com
tanjetina@yahoo.com
taryn.m.striegel@boeing.com
thomasggg2552@msn.com
tiffanyelenin@gmail.com
tina_jacobson@hotmail.com
tinahoek@gmail.com
tjmearnest@gmail.com
tlhoskins@gmail.com
turngroc@comcast.net
ty.satrang2019@protonmail.com
vickyl_sanchez@yahoo.com
vikon99@comcast.net
whipple@whiplawgroup.com
wilder870@hotmail.com
will.stillwell@gmail.com
zlamebull@tulaliptribes-nsn.gov

Mail Only

Darlene Brauford

Jeanette Maize

Thomas & Kanola Steenmeyer

Tony Howerton

Rich McDonald

Carol & George Henry

David Clay

Mary Berg

AJ Lansing

Charles Allen

Blanch and Dave Kosche