Final Supplemental Environmental Impact Statement

for the

Lynnwood City Center Sub-Area Plan

September 9, 2004
City of Lynnwood
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for the
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Dear Affected Agencies, Organizations and Interested Parties:

Enclosed is the Final Supplemental Environmental Impact Statement (Final SEIS) for the Lynnwood City Center Sub-Area Plan. It supplements the EIS prepared for the City of Lynnwood Comprehensive Plan (1994). The actions proposed in connection with the City Center Plan project include: (1) adoption of a sub-area plan for the City Center to guide future development; (2) adoption of development regulations, including zoning standards and design guidelines, to implement the sub-area plan; (3) adoption of plans for capital improvements within the City Center; and (4) potential adoption of an ordinance designating the City Center as a planned action for purposes of future SEPA compliance.

The Final SEIS considers environmental impacts and mitigation measures associated with three City Center redevelopment scenarios, in addition to no action alternative. The identification of a "preferred alternative" in the Final SEIS is provisional and reflects the consensus of the City Center Planning Project Oversight Committee ("Oversight Committee" or "OC"). Labeling one scenario as "preferred" at this time is for analysis purposes only and does not commit the City to any particular course of action.

The Draft SEIS was issued for public review and comment on April 19, 2004. Comments were received from six governmental agencies. No comments were received from groups or individual citizens commenting in their individual capacity. The Final SEIS responds to comments received on the Draft SEIS as permitted by WAC 197-11-560.

The Draft SEIS and this Final SEIS together comprise the EIS that is required to comply with the State Environmental Policy Act (SEPA, RCW 43.21C). The SEIS has been prepared consistent with applicable state and local rules for preparation of environmental impact statements (WAC 197-11).

This Final SEIS has been distributed to agencies and organizations noted on the distribution list. The Final SEIS can be reviewed at the City of Lynnwood Community Development Department and at the public libraries listed on the distribution list. Copies may also be purchased from the City of Lynnwood Community Development Department, 19000 44th Avenue West.

Appeals to this SEIS may be filed according to the provisions of the Lynnwood Municipal Code (LMC) 17.02.195.
Questions regarding the Final SEIS or the City Center project should be addressed to Dennis Lewis, Senior Planner and SEIS Coordinator for City Center Project at 425-670-6297, or dlewis@ci.lynnwood.wa.us.

SEPA RESPONSIBLE OFFICIAL: ENVIRONMENTAL REVIEW COMMITTEE

DATE OF ISSUE: September 9, 2004

DATE OF SIGNATURE: September 8, 2004

POSITION/TITLE

SENIOR PLANNER

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ENGINEERING DEVELOPMENT SERVICES SUPERVISOR:

Arnold Ray, P.E.

PARKS AND RECREATION PLANNER:

Laurie Cowan

COMMUNITY REPRESENTATIVE:

A. John Anderson

September 9, 2004
Lynnwood, Washington
FACT SHEET

Project Title

Lynnwood City Center Sub-Area Plan

Proposed
Action/Alternatives

The Proposed Action by the City of Lynnwood includes the following elements:
(1) adoption of a sub-area plan for the City Center to guide development. The sub-area plan would amend the Lynnwood Comprehensive Plan;
(2) adoption of development regulations, including zoning standards and design guidelines, to implement the sub-area plan;
(3) adoption of plans for improvements within the City Center (which may include amendments to the Capital Facilities element of the Comprehensive Plan); and
(4) potential adoption of an ordinance designating the sub-area plan as a planned action for purposes of future SEPA compliance.

The City Center sub-area is within the Subregional Center designated in the Lynnwood Comprehensive Plan. The sub-area is considered appropriate for high density, mixed-use development supporting increased population and employment growth.

The SEIS considers three alternatives in addition to No Action. Development assumptions over a 20-year planning period are shown below.

<table>
<thead>
<tr>
<th>Land Use</th>
<th>No Action Alternative</th>
<th>Alternative A – Low Intensity</th>
<th>O.C. Preferred Alternative* – Medium Intensity</th>
<th>Alternative C – High Intensity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office</td>
<td>1.6 mil sf</td>
<td>2 mil sf</td>
<td>4 mil sf</td>
<td>6 mil sf</td>
</tr>
<tr>
<td>Retail</td>
<td>1.5 mil sf</td>
<td>1.5 mil sf</td>
<td>1.5 mil sf</td>
<td>1.5 mil sf</td>
</tr>
<tr>
<td>Residential</td>
<td>.2 mil sf 128 du (existing)</td>
<td>2.4 mil sf 2,000 du</td>
<td>3.6 mil sf 30-40 du/acre</td>
<td>4.8 mil sf 5-13 story 50-70 du/acre</td>
</tr>
<tr>
<td>Total</td>
<td>3.3 mil sf</td>
<td>5.9 mil sf</td>
<td>9.1 mil sf</td>
<td>12.3 mil sf</td>
</tr>
<tr>
<td>New Development</td>
<td>0.6 mil sf</td>
<td>3.4 mil sf</td>
<td>6.6 mil sf</td>
<td>9.9 mil sf</td>
</tr>
</tbody>
</table>

Notes:
* O.C. Preferred Alternative = Oversight Committee’s Preferred Alternative.
** The draft development regulations would provide bonuses which could allow buildings to exceed the indicated heights.
1. Includes approx. 1 million square feet of existing office development. New development for No Action includes .2 million square feet institutional and .4 million square feet office.
2. Existing 1.5 million square feet of retail is assumed to be redeveloped.
3. Residential development is all new to the City Center except for 128 existing dwelling units.
Location of Proposal

Lynnwood’s City Center is an approximate 300-acre triangular shaped area generally defined by 194th Street SW and 188th Street SW on the north, 33rd Avenue West on the east, Interstate 5 on the south, and 48th Avenue West on the west.

Proponent

The City of Lynnwood

Lead Agency

City of Lynnwood Community Development Department

Responsible Official & EIS Contact Person

City of Lynnwood Environmental Review Committee
Contact: Dennis Lewis
P.O. Box 5008
Lynnwood, WA 98046-5008
(425) 670-6297

Required Permits & Approvals

City of Lynnwood
Sub-area plan adoption, amendment of the Comprehensive Plan Revised development regulations (zoning, design guidelines) Planned unit development (possible) Subdivision approval (possible) Binding site plan approval (possible) Building permits Planned action ordinance (potential)

State of Washington NPDES permit Right-of-way permit

SEIS Authors & Principal Contributors

Huckell/Weinman Associates, Inc.- document preparation; land use; population, housing and employment; aesthetics; public services; fiscal impacts Mirai Associates - transportation KPFF Engineers - utilities Pentec Environmental - natural environment

Type/Timing of Subsequent Environmental Review

(1) To meet its GMA/planning responsibilities for the City Center and to comply with SEPA, the City of Lynnwood is using SEPA’s phased review provisions (WAC 197-11-060(5)) and its integrated GMA planning/SEPA provisions process (WAC 197-11-220).
(2) If the City decides to implement SEPA’s provisions for Planned Actions, no further environmental review may be required for project proposals that are consistent with the planned action ordinance adopted by the City Council and whose impacts have been addressed in the planned action EIS. Proposals that do
not meet this test would require additional environmental review.

The City is also relying on adopted plans and development regulations to mitigate significant adverse impacts pursuant to WAC 197-11-158.

<table>
<thead>
<tr>
<th>Location of background Information</th>
<th>City of Lynnwood Community Development Department 19000 44th Avenue West Lynnwood, WA 98046-5008</th>
</tr>
</thead>
</table>
| Prior Environmental Documents; Use of Existing Documents | This document supplements the Draft and Final EISs prepared for the Lynnwood General Policy Plan (1994) and the checklist prepared for the 2020 Comprehensive Plan (2001). The following existing environmental documents are being incorporated by reference for purposes of SEPA compliance:  
  - Regional Express Lynnwood Project, Environmental Assessment (June 2000)  
  - 1-5/196th Street Interchange Project EIS (October 1992)  
  - City Center Project Existing Conditions Report (February 2002) |
| Date of Final SEIS Publication | September 9, 2004 |
| Cost & Availability of Final SEIS | Copies of the Final SEIS may be purchased for $10.00. Copies are also available for review at the Lynnwood Community Development Department and the Lynnwood Library. |
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Appendix A – Distribution List
SUMMARY OF ALTERNATIVES, ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

This section provides a brief summary of the environmental information contained in the Lynnwood City Center Plan Draft Supplemental Environmental Impact Statement (DSEIS). The summary describes the framework for the planning process and provides a matrix-level overview of the issues, impacts, and mitigation measures analyzed for each of the proposed alternatives.

This summary is intended to be concise and is selective. For complete information concerning environmental and mitigation measures, please refer to the appropriate section(s) within the Draft and/or Final EIS documents.

A. Proposed Action and Alternatives

1. Proposed Action

The Proposed Action by the City of Lynnwood consists of the following elements:

1) adoption of a sub-area plan for the City Center to guide development. The sub-area plan would amend the Lynnwood Comprehensive Plan;
2) adoption of development regulations, including zoning standards and design guidelines, to implement the sub-area plan;
3) adoption of plans for improvements within the City Center (which may include amendments to the Capital Facilities element of the Comprehensive Plan); and
4) possible adoption of an ordinance designating the sub-area plan as a planned action for purposes of future permit review and SEPA compliance, if the City Council determines to pursue this option.

2. Location of Proposal

The City Center sub-area encompasses a triangular shaped area of approximately 300-acres and is generally defined by 194\textsuperscript{th} Street SW on the north, 33\textsuperscript{rd} Avenue W and 188\textsuperscript{th} Street SW on the east, Interstate 5 on the south, and 48\textsuperscript{th} Avenue W on the west. It represents approximately one-third of the Subregional Center designated in the Lynnwood Comprehensive Plan.

3. Alternatives

The SEIS considers three alternatives, in addition to No Action: Alternative A – Low Intensity; Alternative B – Medium Intensity, which is the Oversight Committee’s Preferred Alternative; and Alternative C – High Intensity. Each alternative assumes a land use pattern and an estimated amount and mix of redevelopment activity in the City Center to 2020. Any of the growth intensity scenarios (low, medium, high) could be paired with any of the land use patterns. The City Center alternatives would organize development in three planning districts – West End, Core, and North End – each with a somewhat different land use emphasis. Growth under the No
Action alternative would consist of additional office uses and redeveloped retail uses throughout the City Center.

The type and amount of development assumed within the City Center over an approximate 20-year planning period are shown below.

<table>
<thead>
<tr>
<th>Land Use</th>
<th>No Action Alternative</th>
<th>Alternative A – Low Intensity</th>
<th>O.C. Preferred Alternative (B) – Medium Intensity</th>
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<tbody>
<tr>
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<td>9.1 mil sf</td>
<td>12.3 mil sf</td>
</tr>
<tr>
<td>New 2020 Development</td>
<td>0.6 mil sf</td>
<td>3.4 mil sf</td>
<td>6.6 mil sf</td>
<td>9.9 mil sf</td>
</tr>
</tbody>
</table>

Note: The amounts of development shown for each alternative are considered maximums for the purpose of SEPA analysis. The data is based on anticipated market and economic conditions over a 20-year period. Development could occur anywhere within the City Center and at potentially differing rates from those reflected in the estimates.
1. Includes approximately 1 million sf of existing development. New development includes office and institutional use.
2. Retail development would replace existing retail.
3. Residential shown in all alternatives except no action is new development.
* The draft City Center development regulations proposes a bonus program which could provide significant height bonuses in exchange for contributions of funding for parks or cultural facilities.

No Action Alternative

The No Action Alternative would retain existing Comprehensive Plan and zoning designations for the City Center. The City would not adopt a sub-area plan. The type, form and amount of development would depend on market conditions and the situations and goals of individual property owners. Redevelopment would not be guided by a cohesive land use concept or plan, nor would it be focused or organized into districts with distinct character and focus. Future land use patterns, therefore, are uncertain and somewhat unpredictable. It is likely that the City Center would function and appear much as it does today, although some intensification of land use would occur.

Under No Action, new uses are assumed to be single function rather than mixed-use, and would be determined by existing zoning. Over 75 percent of the City Center is zoned Community Business, which encourages community-scale development with maximum lot coverage of 35 percent and without limits to building heights. Residential development is not permitted.
Overall, development and redevelopment under this alternative is assumed to result in approximately 3.3 million square feet of development (1.6 million square feet of office and institutional, 1.5 million square feet of retail, and no new multi-family housing units) over a 20-year period. No Action would accommodate an estimated population of 289 people (existing) and 8,700 employees (1,800 new jobs). Buildings height and scale could range from 1-2 story retail buildings to 4-8 story office buildings.

Certain developments and improvements are anticipated to occur regardless of City Center alternative. The convention center proposal, for example, would proceed, as well as transit-oriented redevelopment on the Sound Transit site. These projects could attract development—which might or might not be complimentary—to adjacent sites. Capital improvements would occur incrementally, primarily in response to individual projects.

The No Action alternative would not be designated as a planned action. Future applicants would comply with SEPA and perform environmental review for individual projects. Mitigation would occur on an individual project basis.

Alternative A – Low Intensity/East-West Spine

Development in the Core would be configured around the area of 198th Street SW between 44th Avenue W to the west and 40th Avenue W to the east. This area would serve as the “spine” for locating the most intensive development (i.e., multi-story office buildings) and would be redesigned to include landscaping, pedestrian areas, street-level uses, and on-street parking for vehicular traffic. Some of the buildings would contain street-level retail, while upper floors would accommodate residential uses. Park areas would serve as major features, located as anchors at the ends of the spine and throughout the City Center area.

Other features would include a landmark building (i.e., hotel), located at the east end of the spine, east of 40th Avenue W. The opposite end of the spine, in the West End, would be developed into a residentially-focused urban village with other mixed uses. Multi-family residential uses and some retail would also be located with convenient access to the Transit Center. A new civic building is planned for the northwest corner of 44th Avenue W and 196th Street SW. The proposed convention center would anchor the eastern end of the Core and would be supported by hotels, retail, office and multi-family residential uses. Additional retail would extend east from the convention center along 196th Street SW toward Alderwood Mall and along the 36th Avenue W and 37th Avenue W. A new street would be developed just north of the convention center site.

The North End would emphasize office uses, with some retail and services and residential. Development in this district would not vary significantly between the development alternatives.

Development and redevelopment under this “low intensity” alternative is assumed to result in approximately 5.9 million square feet of development – 2.0 million square feet of office, 1.5 million square feet of retail, and 2,000 multi-family housing units – over a 20-year period. Buildings height and scale could range from 1-2 story retail buildings to 5-10 story office buildings. It would accommodate an estimated population of 3,600 and 9,000 employees.
Oversight Committee (O.C) Preferred Alternative: Alternative B – Medium Intensity/Promenade with Districts

A “preferred” alternative has been identified at this time for purposes of SEPA analysis and to promote further discussion. It combines the medium intensity growth scenario and the “promenade with districts” land use pattern. It is an outgrowth of City Center planning process and the analysis that has occurred to date, including review of an “early” draft SEIS which was published for public review and comment in June 2003. It is “preferred” only in a preliminary sense by the City Center Oversight Committee and does not reflect a formal commitment by the City to a course of action.

The development pattern would be similar to Alternative A (i.e., new parks, civic building, convention center, new street north of the convention center), but at higher (“medium”) levels of intensity. Public plazas and squares would serve as anchors at the ends of 198th Street SW, as in Alternative A, but would also include a north-south street (between 196th Street SW to the north and 200th Street SW to the south), also anchored by public squares.

The O.C. Preferred Alternative would concentrate the most intensive mixed-use development within the Core area and along the promenade. Unique development features of the O.C. Preferred Alternative include: a commercial “attractor”, located on 198th Street SW; higher concentrations of retail in the northern portion of the West End; hotel uses around the square to the south; and a large hotel south of 196th Street SW and across from the convention center.

The O.C. Preferred Alternative would result in development and redevelopment of approximately 4 million square feet of office, 1.5 million square feet of retail, and 3,000 multi-family housing units in the City Center over a 20-year period. It would accommodate an estimated population of 5,400 people and 15,000 employees. Building heights and scales would include 5-13 story residential buildings, developed at 50-70 dwelling units per acre, and 15-34 story office buildings. Building height and scale would be the same as for the high intensity alternative. Proposed development regulations would provide height bonuses for architectural elements and/or contributions of funds for parks or cultural facilities.

Alternative C – High Intensity/Four Squares

The focal point for this City Center alternative is the 6.5-acre town square, located within the Core district between 198th Street SW to the north and 200th Street SW to the south, and between two new streets to the east and west of 44th Avenue W and 44th Avenue W, respectively. A pedestrian “promenade” would serve as a connecting corridor between the districts.

Similar to Alternatives A and B, office development would be focused in the Core and North End districts and the Core would contain the highest intensity of mixed uses. Hotels could locate in the Core, as well as near the proposed convention center. Mixed-use development and concentrations of retail and residential development would be located similarly to Alternatives A and B.
Unique development features of Alternative C include: a landmark building at the north end of the town square and across from 198th Street SW; a cultural or commercial center, south of the park at 200th Street SW; and a local transit center at the northwest corner of 44th Avenue W and 196th Street SW.

Alternative C includes the highest level of development intensity among the alternatives – 6.0 million square feet of office development, 1.5 million square feet of retail development, and 4,000 multi-family housing units in 20 years within the 20-year planning period. This intensity would accommodate an estimated population of 7,200 people and 21,000 employees. Building height and scale would range from 5-13 story residential buildings developed at 50-70 dwelling units per acre, to 15-34 story office buildings. Proposed development regulations would provide height bonuses for architectural elements and/or contributions of funds for parks or cultural facilities.

4. Planning Process & Environmental Review

In 1995, the City of Lynnwood adopted a Comprehensive Plan in accordance with the requirements of the Growth Management Act. The Draft and Final EIS documents for the Comprehensive Plan were also published at this time. The Comprehensive Plan was prepared in the context of urban centers planning to direct and concentrate portions of future population and employment growth into the City Center and unincorporated activity centers at high densities. The plan’s Subregional Center concept (which includes the City Center sub-area) was designed to provide economic and redevelopment opportunities by promoting mixed-uses, including commercial, residential, public, and open space development in a central downtown environment.

Supplemental EIS/Phased Environmental Review

This Supplemental EIS (including the Draft and Final SEIS documents) is being prepared as a supplement to the City’s Comprehensive Plan EIS. It focuses on differing development patterns and intensities for a range of alternatives and identifies new probable, significant adverse environmental impacts that have not been addressed in prior SEPA documents (WAC 197-11-405(4)). It builds on numerous plans, studies, and environmental documents that have been prepared for proposals in and around the City Center. It does not repeat analysis of alternatives or impacts that were addressed in the EIS being supplemented (WAC 197-11-620), or in other documents adopted for purposes of SEPA compliance.

The City is following a course of phased environmental review for its Comprehensive Plan and City Center plan. This is consistent with the goals of the Growth Management Act (GMA), provisions of the State Environmental Policy Act (SEPA) rules (WAC-197-11-060(5)(b)), and Lynnwood’s SEPA ordinance. Phased review allows the City Center SEIS to focus on issues that are ripe for evaluation at this time, and to defer evaluation of issues or aspects of issues that require further definition for analysis in order to be meaningful.
The City is also integrating its GMA planning with SEPA review, as permitted by WAC 197-11-220. This permits the planning process and the SEPA process to proceed in tandem and to reflect and share the information and preliminary guidance established in planning documents and environmental analysis.

In June 2003, the City published an early draft of the Draft SEIS for the purpose of encouraging public involvement and soliciting initial comment and reaction to the City Center alternatives. That preliminary document identified Alternative C/High Intensity as the Oversight Committee’s “preferred” alternative. Identification of a preferred alternative is not required by SEPA and did not commit the City to a course of action. It was intended to help interested parties evaluate the highest range of impacts and the most extensive array of mitigation measures that could be required to support long-term growth. The early draft also provided an opportunity for interested parties to continue discussing approaches and responsibilities to providing and financing improvements. As a result of this discussion, the Draft SEIS identified the O.C. Preferred Alternative (B), the Medium Intensity City Center development scenario, as the Oversight Committee’s preferred alternative. It is coupled with the “promenade with districts” land use pattern. Discussion and evaluation will continue throughout the environmental review process and could lead to further changes in the alternatives.

**Planned Action**

The City may decide to designate the study area as a "planned action" pursuant to the State Environmental Policy Act (SEPA, RCW 43.21C.031(2)(a)) and implementing rules (WAC 197-11-164 et seq.). This SEIS has been prepared to support a planned action if the City determines to adopt this approach. If it does, Lynnwood will follow applicable procedures, described generally below, to review proposed projects within the area, to determine their consistency with the approved planned action, and to impose any appropriate development conditions.

Planned actions are a type of site-specific project actions located within an Urban Growth Area. Qualifying projects are those that are consistent with and implement a comprehensive plan or sub-area plan, and whose significant environmental impacts have been adequately addressed in an EIS prepared for the sub-area. An ordinance or resolution must designate the planned action, must describe the types of projects to which the planned action applies, and describe how the planned action meets the criteria in the SEPA Rules (WAC 197-11-168). Also, it must specifically find that the environmental impacts of the planned action have been identified and adequately addressed in the SEIS and should also identify mitigation measures applicable to the planned action.

When an implementing project is proposed, the City must first verify that the proposal is the type of project contemplated in the planned action ordinance and that it is consistent with the applicable sub-area plan. It must also determine that the probable significant adverse environmental impacts of the planned action project have been adequately addressed in the planned action SEIS. If the proposal meets this test and qualifies as a planned action, no SEPA threshold determination or further environmental review is required. The City may, however, require additional environmental review and mitigation if significant adverse environmental...
impacts were not adequately addressed in the planned action SEIS or if the proposed project does not qualify as a planned action.

5. Implementation Program

Implementation of the City Center Sub-Area Plan will occur over an extended period of time and will employ a variety of mechanisms and programs, including development regulations and financing programs. Existing and new regulatory programs, for example, will require provision of certain development-related improvements in connection with project approval. Proposed City Center zoning regulations also include incentives (e.g., a height bonus) for contributions towards public amenities, like parks and cultural facilities. The City is also evaluating application of a transportation concurrency program which would ensure that development is phased with improvements to the road system.

As the draft City Center Plan has been developed and reviewed, the City has also been evaluating approaches to financing the improvements – including grid streets and arterials, the promenade, plazas and parks, and utilities – needed to implement the City Center vision. While numbers are not firm, the outline of the City’s approach is clear. The City will continue to refine its approach as the draft City Center plan is reviewed and discussed. The necessary package of improvements, an overall funding program and formula(s) for determining the share of future City Center development, will be included in an implementation plan and appropriate development regulations. Or, if the City determines to designate the City Center as a planned action, such mitigation requirements would be included in a planned action ordinance.

Improvements for grid streets, arterial streets and intersections, the promenade, plazas and parks, and utilities (sewer, water, drainage) are currently estimated to cost approximately $114 million; cost estimated will be refined along with other elements of the implementation program. In general, financing will be the shared responsibility of individual developers and property owners, and the City as a whole. The developer share (approximately 54 percent) is assumed to be generated through creation of one or more local improvement districts (LID). No protest agreements would be executed in conjunction with development approval to ensure participation in proposed LIDs. Developers would also be required to construct road improvements to mitigate for project-related transportation impacts. The City’s share (approximately 46 percent) would be funded by a combination of state and federal grants and funds generated from tax revenues, including significant tax revenues attributable to new development in the City Center. Regional funding, from a proposed Regional Transportation Improvement District (RTID), is also possible.

B. Summary of Significant Impacts

Table S-2 summarizes the significant environmental impacts and mitigation measures evaluated in the Draft SEIS. Significant unavoidable adverse impacts are also identified. The following elements of the environment are evaluated in this document:
• Natural Environment – Plants, Animals, & Surface Water
• Land Use
• Plans, Policies, and Regulations
• Population, Housing, and Employment
• Aesthetics and Urban Design
• Public Services
• Utilities
• Transportation

Potential impacts to other elements of the environment – including earth, air quality, hazardous materials, noise, and historic and cultural resources – were reviewed in the context of existing environmental documents. It was determined that these issues were adequately addressed in existing documents and did not require detailed consideration in the Draft SEIS. Please see the Introduction of Section III for a summary of these issues. A fiscal analysis has been prepared and published separately.
Table S-2
Summary of the Significant Environmental Impacts by Alternative

<table>
<thead>
<tr>
<th>Elements of the Environment</th>
<th>No Action Alternative</th>
<th>Alternative A (Low Intensity)</th>
<th>O.C. Preferred Alternative (B) (Medium Intensity)</th>
<th>Alternative C (High Intensity)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>IMACTS</strong></td>
<td></td>
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</tr>
<tr>
<td>NATURAL ENVIRONMENT – PLANTS, ANIMALS &amp; SURFACE WATER</td>
<td>Plants and Animals. No significant or negative impacts are anticipated for any of the alternatives. Existing wildlife species could gain additional habitat area from increases to parks and open spaces (except for No Action). Noise and lights from the transit lot could potentially disturb wildlife breeding, nesting, and feeding, but changes to the configuration of the transit site are not expected to increase the level of disturbance over existing conditions. Minimal and insignificant impacts to wildlife could occur in the off-site wetland (Wetland 18), as a result of increased population and activity nearby.</td>
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<td>Surface Water. Implementation of any of the alternatives would likely result in insignificant and/or potentially positive impacts. Development would result in no net increase in impervious surfaces. An incremental reduction could occur as a result of planned parks and open spaces (except for No Action). Improvements in water quality and peak flow attenuation in Scriber Creek (primarily downstream) could result in positive impacts on fish and fish habitat in the creek and in downstream water bodies.</td>
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<td>Increases in vehicular traffic could increase the pollutant load in stormwater runoff. Improvements in detention, runoff treatment, and flow control requirements could occur, consistent with drainage requirements of the City and Ecology. The quality of stormwater runoff may improve.</td>
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<td>LAND USE</td>
<td>Future development in the City Center would be similar in type and character to what exists today – primarily retail and office. Development and redevelopment would occur incrementally, without the guidance or integration of a sub-area plan or planning districts. The land use pattern would be less predictable. There would be greater potential for uses of different scale located adjacent to one another.</td>
<td>Impacts would generally be similar among the alternatives; differences would be of degree. Implementation of the City Center Sub-Area plan would result in the incremental displacement and redevelopment over time of the majority of existing land uses in the approximate 300-acre City Center area. Single-use activities would be replaced by mixed-use developments at higher densities and intensities. Development policies, regulations and design guidelines would result in larger, well-designed commercial buildings, housing, public facilities and a finer street grid. The character and function of the City Center would change over time – land uses would be more balanced, integrated, pedestrian oriented and transit supportive. The most significant adverse impacts could occur along the edges of the planning area, where more intensive City Center development would be located adjacent to existing residential areas (to the north and west). Greater impacts could occur as the scale and intensity of City Center redevelopment increases. Generally, City Center land uses would decrease in scale at these edges to minimize impacts. Construction of new buildings, streets, and other components of the City Center would result in temporary impacts to adjacent land uses (e.g., dust, noise, traffic).</td>
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<td>Elements of the Environment</td>
<td>No Action Alternative</td>
<td>Alternative A Low Intensity</td>
<td>O.C. Preferred Alternative (B) Medium Intensity</td>
<td>Alternative C High Intensity</td>
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<td>LAND USE (cont’d)</td>
<td>Individual property owners would propose to redevelop according to current land use and zoning designations, perceived market opportunities, and individual goals or situations. It is not certain if or when parks, street, or pedestrian improvements would be made.</td>
<td>Redevelopment of the City Center could influence requests for changes to land use or zoning designations adjacent to the sub-area. Property values may increase as a result of the enhanced development potential, appearance and function of the City Center. The West End would contain the majority (65 percent) of anticipated residential development. Parks and open space, retail uses, and transit facilities would be interspersed amongst residential developments, providing residents access to shops, transit, and recreation opportunities. Retail uses would occupy the lower level of multi-family residential buildings. The enhanced street grid and shorter blocks would provide easy pedestrian access, as well as multiple routes for automobile movement. A transit center could be located at the northwest corner of 196\textsuperscript{th} Street SW and 44\textsuperscript{th} Avenue W, which is also a planned “gateway” into the City Center. Depending on function, design and site planning, a transit facility could generate noise and traffic impacts to planned residential activities. The Core would be developed most intensively among the districts and would include a mix of office, retail, and residential. The development of the proposed convention center could attract supporting uses, such as hotels and offices to the north of 194\textsuperscript{th} Street SW. Depending on their scale and use, these uses could contrast with existing low intensity uses. The Core would be intensively developed with a mix of uses. It would function as the commercial and civic heart of each City Center alternative. The convention center, located in the core, would be lower in height and smaller in scale than much of the development planned adjacent to it. It would, however, still be larger in scale than suburban residential uses to the north, and could affect these uses (lighting, noise and traffic associated with convention center activities). No significant impacts to other jurisdictions are anticipated.</td>
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</table>
| Elements of the Environment | No Action Alternative | Alternative A  
*Low Intensity* | O.C. Preferred Alternative (B)  
*Medium Intensity* | Alternative C  
*High Intensity* |
|-----------------------------|----------------------|------------------|------------------|------------------|
| **LAND USE (cont’d)**       | Land Use Estimates:  
Office: 1.6 mil sf  
Retail: 1.5 mil sf  
Residential: 0.2 mil  
(128 du existing)  
Total sf: 3.3 mil sf  
New Development: 0.6 mil sf  
After No Action, Alternative A represents the lowest level of redevelopment. Potential land use conflicts would be somewhat lower than the other City Center alternatives.  
Planned uses within each City Center district would generally be compatible with one another | Land Use Estimates:  
Office: 2.0 mil sf  
Retail: 1.5 mil sf  
Residential: 2.4 mil sf (2,000 du; 30-40 du/acre)  
Total sf: 5.9 mil sf  
New Development: 3.4 mil sf | Land Use Estimates:  
Office: 4.0 mil sf  
Retail: 1.5 mil sf  
Residential: 3.6 mil sf (3,000 du; 40-50 du/acre)  
Total sf: 9.1 mil sf  
New Development: 6.6 mil sf  
The impacts of the O.C. Preferred Alternative would similar in type but more intensive than Alternative A and No Action, less intensive than the “Alternative C” within the 20-year planning period, but similar in scale.  
Planned uses within each City Center district would generally be compatible with one another | Land Use Estimates:  
Office: 6.0 mil sf  
Retail: 1.5 mil sf  
Residential: 4.8 mil sf (4,000 du; 50-70 du/acre)  
Total sf: 12.3 mil sf  
New Development: 9.9 mil sf  
Alternative C would result in the most intensive and concentrated redevelopment. Significant changes in land uses would occur, relative to existing conditions.  
Over time, the concentration of 15-34 story mixed-use buildings in the Core would dramatically change the scale and intensity of land use in the City Center. The area would look, feel and function as a pedestrian-oriented downtown, rather than the present uncoordinated collection of suburban, auto-oriented retail centers.  
Planned uses within each City Center district would generally be compatible with one another. |

*Lynnwood City Center Plan Final SEIS*  
*S-11*  
*Summary*
Table S-2 (cont'd)

<table>
<thead>
<tr>
<th>Elements of the Environment</th>
<th>No Action Alternative</th>
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<th>O.C. Preferred Alternative (B) (Medium Intensity)</th>
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<tr>
<td><strong>PLANS, POLICIES, AND REGULATIONS</strong></td>
<td>The No Action Alternative would be generally consistent with the GMA. However, it would not advance the goals of GMA or the Lynnwood Comprehensive Plan to the same extent as the City Center alternatives.</td>
<td>The City Center Sub-Area Plan is consistent with GMA planning goals to guide growth into an area with existing and planned infrastructure. In general, the types and intensities of land uses indicated in the sub-area plan would be consistent with the intent of the Lynnwood Comprehensive Plan (i.e., incorporating a mix of uses, including office, retail, residential, parks/open space and public land uses). The City Center sub-area is a portion of the Subregional Center, which was designated in the Comprehensive Plan to achieve the objectives of the Countywide Planning Policies and the Puget Sound Regional Council’s Vision 2020. The sub-area plan would implement the Subregional Center concept by concentrating and intensifying future residential and employment growth in an area identified as appropriate for more intensive growth. New development regulations and design guidelines would permit residential and mixed-use development throughout the City Center. Housing would advance GMA and City goals.</td>
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<tr>
<td><strong>POPULATION, HOUSING, AND EMPLOYMENT</strong></td>
<td>No Action would not include housing and would not accommodate additional population within the City Center. Continued dominance of retail employment would perpetuate the City’s dependence on a single economic sector with lower paying jobs. There would be no balance between housing and jobs.</td>
<td>All City center alternatives would achieve a better balance of population, housing and employment in the City Center relative to existing conditions. Housing and jobs would be concentrated in an urban downtown, proximate to services and transit. Housing would be multi-family in character and would include a mix of rental and for-sale units. Housing would generally be market rate, but higher density housing could provide greater opportunities for affordable units. Growth would exceed the 2012 population projections for the Subregional Center area (which is larger than the City Center), but would be within 2012 employment projections. However, the regional growth strategy contained in the Countywide Planning Policies and Vision 2020 indicates that an increasing share of growth should be allocated to designated urban centers. The additional development capacity represented by Alternative C would enable Lynnwood to accommodate a larger relative share of growth within the region. Although potential growth within the City Center could exceed Lynnwood’s 2012 population projection, this is not viewed as an adverse impact and would not affect the ability of other cities or unincorporated areas in the region to also achieve their targets.</td>
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<tr>
<td>IMPACTS</td>
<td>Estimated population, housing and employment:</td>
<td>Estimated population, housing, and employment:</td>
<td>Estimated population, housing, and employment:</td>
<td>Estimated population, housing, and employment:</td>
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<tr>
<td>Housing: 289 units (existing)</td>
<td>Housing: 2,000 units</td>
<td>Housing: 3,000 units</td>
<td>Housing: 4,000 units</td>
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<td>New Jobs: 1,800</td>
<td>New Jobs: 3,000</td>
<td>New Jobs: 9,000</td>
<td>New Jobs: 15,000</td>
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<tr>
<td><strong>IMPACTS</strong></td>
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<td>AESTHETICS AND URBAN DESIGN</td>
<td>No Action would result in little change to the City Center’s overall visual quality.</td>
<td>All City Center alternatives would result in significant changes in visual character relative to existing conditions and would not likely result in significant adverse aesthetic impacts. Changes would occur incrementally over time, in conjunction with City Center redevelopment and capital improvements. Some residents may view the change from the existing suburban character to more intensive urban uses as negative. Others may view it as a positive and expected change that symbolizes Lynnwood’s maturing and establishing a new image of the City.</td>
<td>The City Center would be organized into three districts, each with a defined land use emphasis. Each district would develop a distinct visual character and would be connected visually and functionally by pedestrian corridors. The combination of streetscape improvements and the construction of new buildings with pedestrian-oriented street frontages will increase the sense of streetscape continuity throughout the City Center. The alternatives will likely result in increased light, glare, and shadowing. Buildings constructed to the maximum height permitted by proposed zoning (including height bonuses) could shadow planned public parks or spaces during some times of day during parts of the year. Some blockage of views to the east could occur from some locations adjacent to the Core. New views would be created from the upper stories of taller buildings. Contrasts in building heights and scales could occur between existing buildings and new development; this would likely change over time, as the City Center develops. Differences in development intensity and building height would also occur at the northwest corner of the West End and along the west side of the North End, where residential properties are located just outside of the City Center. The Convention Center, approximately 50 to 70 feet in height at its tallest points, would not be as tall as other new buildings in the Core. However, it would be relatively massive and bulky in scale, compared to existing smaller scale uses in the City Center.</td>
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<td>There would be no new zoning or design guidelines for the City Center, and current zoning districts and standards would govern redevelopment. Existing zoning would continue to require building setbacks from the street, and would discourage or prohibit mixed-use development of the kind envisioned in the City Center plan. New development would be similar in appearance to recent development. Development would occur in single use buildings. Continued reliance on surface parking. No new streets or streetscape improvements are assumed to occur.</td>
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<td>AESTHETICS AND URBAN DESIGN (cont’d)</td>
<td>In the absence of districts that emphasize particular uses, there would be no unity or predictability in the location</td>
<td>Aesthetics impacts generally would be lesser in extent and magnitude than those associated with the “Alternative C.”</td>
<td>Building heights and intensities would be similar to “Alternative C.”</td>
<td>Under Alternative C,” the City Center would redevelop into an urban downtown center,</td>
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<tr>
<td>IMPACTS</td>
<td>of new buildings and uses within the City Center.</td>
<td>dramatically changing the visual character relative to existing conditions.</td>
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<td>The most intensive aesthetic changes would occur in the Core district. This area will include unique public spaces – a promenade, park, and a large town square with underground parking.</td>
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<td>Taller buildings (up to 34 stories and possibly higher) could create some territorial or mountain views to the east.</td>
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<td>PUBLIC SERVICES</td>
<td>Development under any of the alternatives would increase the number of fire-related calls, fire inspections, and medical emergencies. As a result, it would be necessary for the Lynnwood Fire Department (LFD) to expand fire services. This could include adding personnel and equipment, building or expanding facilities, and/or reevaluating staffing methods. The level of service standard could be revised to account for the significant influx of workers/day population, rather than calculating service levels on population only.</td>
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<td>Fire</td>
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<td>The number of service calls would also increase under all of the alternatives. Development would place higher demands on fire personnel in order to perform additional inspections, provide public education and training services, and to respond to construction-related injuries.</td>
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<td>Overall, a more concentrated land use pattern could positively influence the efficiency of service.</td>
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<td>PUBLIC SERVICES</td>
<td>No Action would generate no additional population, but would contribute 1,800 new</td>
<td>The impacts on personnel, facilities, and equipment needs would be slightly less than O.C.</td>
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<td>(cont’d)</td>
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<td>O.C. Preferred Alternative (B) would require a moderate increase in fire service – between that of Alternative</td>
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|                             | | The LFD estimates that it would ultimately need one additional fire engine (3
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<td><strong>Fire (cont'd)</strong></td>
<td>jobs.</td>
<td>Preferred Alternative (B) and “Alternative C,” and greater than No Action.</td>
<td>A and “Alternative C.”</td>
<td>additional personnel, one paramedic van (2 personnel), and one aid car (2 personnel) by the year 2020. The LFD currently has one ladder truck and other equipment necessary to serve the increased building heights</td>
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<td><strong>Police</strong></td>
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<td>The City Center alternatives would increase demands for police protection services. The need for enhanced community service programs, supported by the City of Lynnwood Police Department (i.e., Lynnwood Citizens Patrol, Volunteers in Public Safety, and Police Explorers Post 911) could also increase. Providing increased service could include adding personnel, purchasing equipment and/or expanding existing facilities. Increases in service costs could also occur.</td>
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<td>Current LOS standards are based primarily on residential population and do not directly account for employment and type or intensity of land use. Using this standard, impacts would be directly proportional to relative population growth among the alternatives. Impacts would range from a need for no new officers for No Action, seven officers for Alternative A, 7/8 for the O.C. Preferred Alternative and 14 for “Alternative C.” These personnel may require additional patrol cars and related equipment, but would not require any new or expanded facilities. The LPD also does not anticipate the need for additional clerical staff or jail facilities. The additional officers needed to support Alternative C could require facilities expansion and significant cost increases.</td>
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<td>During building construction in the City Center, the LPD could experience an increase in calls for service related to construction site theft or trespassing. The level of security measures utilized on-site during construction, such as fencing and signage, will directly influence the need for police.</td>
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<td><strong>PUBLIC SERVICES (cont’d)</strong></td>
<td>No Action would result in no additional population and would not impact school services or facilities.</td>
<td>The City Center alternatives would increase the number of multi-family housing units within the City Center, which could result in higher student enrollment in the ESD and contribute to the need for additional school programs, staff and facilities. The extent of impacts depends on the rate of growth and how the growth relates to capacity projections for 2012 and 2020. The additional enrollment generated by the alternatives would not exceed ESD capacity projections (currently set for the year 2007). By 2020, development under Alternative C would result in the highest number of new multi-family units (4,000) and potential new students (876). The O.C. Preferred Alternative would generate 657 students. By 2020, the District will have unhoused students at all grade levels. Current funded construction projects will not provide adequate capacity to house all of the projected high school students through the year 2020. The ESD would need to construct numerous additional classrooms and purchase additional property for school construction.</td>
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<td><strong>Schools</strong></td>
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<td><strong>Parks and Open Space</strong></td>
<td>Applying the City’s LOS standard, which is based on residential population, No Action would not generate needs for additional park and open space land. Employment growth could possibly result in a minor increase in park use.</td>
<td>Additional parks and open space would be required to meet the increased demand associated with City Center growth. The intensity of use of the City’s existing parks and open space areas could also increase. Demand for trails would increase incrementally among the City Center alternatives. Needs would range from 2,046 feet (Alternative A) to 4,092 feet (Alternative C) in 2012, to approximately 4,752 feet (Alternative A) to 9,504 feet (Alternative C) in 2020. Based on the adopted LOS, Alternative A would require an additional 16 acres of parks and open space by 2012, and an additional 20 acres by 2020. Based on the adopted LOS, the O.C. Preferred Alternative (B) would require an additional 23 acres of parks and open space by 2012, and an additional 30 acres by 2020. Based on the adopted LOS, the Alternative C would require an additional 31 acres of parks and open space by 2012, and an additional 41 acres by 2020.</td>
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<td><strong>UTILITIES</strong></td>
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<td><em>Storm Drainage</em></td>
<td>Redevelopment would not increase impervious surface. No Action and Alternative A would generally have the same street grid system and storm drainage system as exists today.</td>
<td>Redevelopment would not increase impervious surface. Open space and parks included in all City Center alternatives could reduce the amount of impervious surface by some amount. Redevelopment would have to comply with Ecology’s updated methods for stormwater detention and treatment, resulting in a positive benefit to water quality and downstream waters. Proposed detention and treatment for the sub-area plan would consist of a system of underground vaults for detention and mechanical treatment. O.C. Preferred Alternative (B) and the Alternative C would result in new streets and the implementation of a new storm drainage network to manage stormwater runoff. The widening of 200th Street SW from 44th Avenue W to SR-99 would also require upgrading the street with a new collection, detention, and treatment system. To comply with current DOE stormwater guidelines, oil/water separator and filter media treatment elements must be installed as part of the treatment system.</td>
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<td><strong>Water</strong></td>
<td>There is adequate water storage capacity and supply to meet the demands of all of the alternatives.</td>
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<td>The existing network of distribution mains in the City Center sub-area would be adequate to meet the needs of No Action and Alternative A.</td>
<td>The existing network of distribution mains within the City Center sub-area would need to be significantly expanded to accommodate the fire flow requirements of the O.C. Preferred Alternative (B) and “Alternative C.”</td>
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<td><strong>Sanitary Sewer</strong></td>
<td>Implementation of the City Center alternatives would increase wastewater demands. New sewer mains would be installed in all new streets, as needed to serve adjacent parcels. The existing wastewater system has adequate capacity to accommodate 2010 flows under all alternatives. The City’s Comprehensive Plan will be updated to address 2020 conditions city-wide. Similarly, pump station 10 has adequate capacity to accommodate 2010 flows under all alternatives.</td>
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<td>Utilities (cont'd)</td>
<td>Increased population and employment growth would generate additional demands for electrical power. Upgraded or new substations would be necessary to accommodate the added load. The addition of a new substation would require further analysis, planning and coordination by the City and PUD to determine exact location and timing for the facility. Placing the existing overhead utilities underground will also require coordinated planning between the City and utility providers who occupy shared overhead space. Underground trenches would be required to carry the utilities.</td>
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<tr>
<td>Electricity</td>
<td>The PUD requires a power switching cabinet facility on the average of about one per block. This will require that at least one piece of land, approximately 15 feet square in dimension, is provided at each block to accommodate City Center power supply needs. Some critical intersection areas may require two or more of these cabinets. To optimize land space, these facilities could be placed within buildings or under the sidewalks.</td>
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<td>Telecommunications</td>
<td>Under any City Center alternative, and particularly for the O.C. Preferred Alternative (B) and &quot;Alternative C,&quot; increased demand for telecommunications infrastructure will occur. As the undergrounding of power lines occur, telecommunications providers should bury their facilities in the same underground trench network. Affected providers will need to anticipate planned growth and evaluate necessary requirements to upgrade their infrastructure and service.</td>
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| Transportation | No Action assumes that only currently programmed improvements identified in the adopted TIP would be implemented. These include:  
- Add a southbound lane on 44th Avenue W from 195th Street SW to I-5 on-ramp.  
- Install two signals at 40th Avenue W and 188th Street SW, and 40th Avenue W and 200th Street SW.  
In general, intersections in the City Center will become more congested. The intersection of 44th Avenue W and 196th Street SW will operate at LOS F (significant delay) and the intersection of 44th Avenue W and 200th Street SW will operate close to LOS F. Many other intersections will experience degradations of levels of service but would operate at acceptable conditions. | Overall levels of traffic congestion in the City Center in 2020 would be slightly better than existing levels, assuming implementation of identified improvements. Average vehicle delay at the intersection of 44th Avenue W and 196th Street SW would be about 56 seconds compared to 64 seconds delay currently. | Traffic congestion in the City Center in 2020 would be about the same as or slightly greater than today's levels, assuming implementation of identified improvements (arterial and intersection improvements, transportation demand management actions through employee parking charges, increased transit services, and new local access streets). 44th Avenue W and 196th Street SW, would experience the same level of congestion and operate at the same level of service as it does currently. |

*Lynnwood City Center Plan Final SEIS*

**Summary**
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<tr>
<td>TRANSPORTATION (cont’d)</td>
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<td>Regional transportation improvements identified for Alternative C, the high intensity scenario, (e.g. I-5 ramps), would not be needed to meet adopted LOS standards.</td>
<td>Fewer improvements would be required to maintain acceptable levels of service in 2010. Improvements to regional facilities (such as new I-5 ramps) and those located in state right-of-way would not be needed until after 2010.</td>
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C. Mitigation Measures

Natural Environment – Surface Water, Wetlands, Plants & Animals

Recommended mitigation measures include: (1) implementation of construction best management practices (BMP); (2) compliance with Lynnwood/Ecology drainage standards, critical areas regulations, and State water quality standards; and (3) increased landscaping and pervious surface, where possible (i.e., landscaping, parks). Interpretive signs could be installed in and around Wetland 18 to educate users about wetland sensitivity and functions.

Land Use

Impacts would generally be mitigated through development and implementation of revised development regulations and design guidelines, consistent with Draft City Center Sub-Area Plan policies. Revised standards would address types and location of uses, site planning, building design, and site features within each City Center district. Specific attention should be given to City Center development located adjacent to residential areas and to the compatibility of building design/height with adjacent parks/open space areas, especially within the Core. Types of mitigation measures for planned land uses could include building modulation, landscape buffers and upper story building setbacks. These would be implemented through design review of individual development proposals. The City could consider an amortization program to facilitate phasing out or correcting incompatible land uses features.

Population, Housing, and Employment

Updated population and employment targets for 2020, when adopted, should reflect the objectives and assumptions of Lynnwood’s City Center Sub-Area Plan. The increased development capacity represented by the City Center Plan could help other jurisdictions in Snohomish County accommodate their future growth.

The City Center sub-area plan and development regulations could consider more explicit programs for affordable housing to meet the needs of specified income groups. The City could also consider taking advantage of existing tax incentives for affordable housing within urban centers (RCW 84.14). Impacts associated with increased residential population, such as demands for neighborhood amenities and facilities, can be addressed through implementation of proposed City Center policies, new development regulations and capital facility programs.

Aesthetics and Urban Design

In general, most aesthetic and visual changes associated with the City Center Alternatives would be positive and do not require mitigation. The proposed City Center Sub-Area Plan incorporates a number of policies that address potential aesthetic impacts of the proposal. City Center development regulations and design guidelines/design review would address specific issues identified in the impact analysis.
To mitigate impacts that could be caused by differences in development intensity between new City Center development and existing lower intensity land uses adjacent to the City Center, the draft Sub-Area Plan could be revised to include a policy calling for graduated or lowered maximum Floor Area Ratios (FARs) where the City Center abuts lower intensity development, and especially where it abuts single and multi-family zoned properties. These guidelines could include provisions for expanded upper-story building setbacks, enhanced landscaping, building façade modulation, and similar measures.

The Sub-Area Plan includes several policies that, if implemented, should adequately mitigate impacts from building heights and shadowing to streetscape-related features (e.g., CCLU 7 - building heights/shadowing, and CCUD 1, CCUD 2, CCUD 13 - streetscape continuity). In addition, the City should consider establishing lower building height limits, or requiring enhanced building setbacks or upper-story setbacks, where new development would have shadowing/shading impacts on new parks, plazas, and other public open spaces within the City Center.

The City Center design guidelines should discourage, limit, or prohibit the use of highly reflective exterior building materials. The City should consider requiring lighting limits, low-sodium lighting, and full cut-off lighting fixtures for parking lots, and should incorporate low hanging street lamps into street improvements to minimize light impacts, particularly in locations where the City Center abuts existing residential neighborhoods.

Shadow impacts to public spaces, such as planned parks or the promenade, could be reduced but not eliminated by limiting the heights of buildings adjacent to those spaces.

Public Services

Fire and Police Services: The Lynnwood Police Department and Fire Department should review their respective level of service standards to account for projected employment increases in the City Center. Monitoring of service demand is also recommended to help distinguish between residential and non-residential demands. Any adjustments to level of service standards should be reflected in future Comprehensive Plan and capital facilities plan updates.

The City could establish specific design and construction standards, such as building design for fire prevention, to reduce demand for fire protection services and/or improve the ability for service. Other measures could include ensuring mandatory sprinklers, a looped and gridded water system with a dual supply source, and providing efficient building access for emergency vehicles.

Construction site security measures should be implemented to reduce potential criminal activity, including on-site security surveillance, fencing, lighting, and secure areas for equipment. Increased worker safety measures could also reduce the number of potential emergency incidents during and after construction.

Tax revenues generated by future commercial and residential development will likely address a portion of the future needs for both fire and police services. Some forms of revenue
enhancements or regulatory measures may also need to be considered. More detailed financial and capital facilities strategies will be developed as the sub-area plan is refined and as fiscal impact information is considered.

The City should continue to gather ideas and develop effective traffic planning methods that will enhance police service to the residents and workers. Citizen-based programs—such as the Lynnwood Police Department’s Citizens Patrol or Volunteers in Public Safety—could be enhanced to provide further support to the police department.

**Schools:** The ESD should review current projections, monitor growth and update future Capital Facilities Plan to address population targets for the City Center. Future enrollment projections should reflect the population and housing targets adopted and used for planning purposes in the City’s Comprehensive Plan.

The City could consider adoption of an impact fee ordinance, consistent with RCW 80.02.020, in order to address the impacts from future City Center growth. Planned redevelopment would generate property tax revenues, which could be available to the to help support the growth needs of the School District.

**Parks and Open Space:** To provide the park, recreation, and open space facilities needed citywide and within the City Center, the City should seek to preserve potential open space areas, as well as acquire park sites for “Core Park” development. The City could provide incentives in development regulations, such as increased density, in exchange for park dedication, construction or enhancement.

The City could adopt LOS standards for parks and trails specific to the City Center.

The City should identify funds for acquisition, construction, and maintenance of parks and open space. Where feasible, the City should seek acquisition and development of these lands through joint efforts with the County and other jurisdictions.

Tax revenues will address a portion of future needs. If necessary, the City could consider other revenue sources, such as dedications of land or impact fees pursuant to RCW 82.02.020. More detailed financial and capital facilities strategies will be developed as the sub-area plan is refined and as fiscal information is considered.

**Utilities**

The utility systems impacts identified in the Draft SEIS will be addressed through a combination of ongoing system planning, construction of improvements, and project level mitigation. The need for system upgrades are the result of forecast growth in Lynnwood generally as well as a consequence of growth within the City Center. Some also reflect existing needs and deficiencies.

Mitigation for utility impacts will generally involve a combination of development regulations and standards, system improvements (which are or will be planned, programmed and financed), capital improvement programs, and project-level requirements which could include payment of
system development fees, construction of improvements, dedications of land, and similar techniques. Project-related conditions of approval/mitigation requirements will be identified in a planned action ordinance if the City designates a planned action, or in the implementation program and corresponding development regulations for the City Center.

**Storm Drainage.** Stormwater system improvements should be phased: Detention and treatment elements should be constructed as part of initial improvements followed by the collection systems. In the event that new street improvements in the upper part of the basin are implemented before the lower portion is built, temporary detention and treatment facilities would be required and/or easements and right-of-way dedicated for construction of downstream lines. Ongoing planning would identify the exact phasing, sequencing, and timing for construction of the improvements for each sub-basin. (These requirements also apply to the sanitary sewer improvements.)

New streets, open space, and private redevelopment projects should comply with adopted City of Lynnwood standards/Ecology requirements for stormwater detention and treatment. Construction best management practices (BMPs) should be required to protect downstream resources.

**Water.** Appropriate BMPs should be employed during construction,

Water conservation methods should be promoted as part of all development to reduce overall water usage for the City Center. These might include low flow plumbing fixtures and other measures which reduce consumption.

**Sanitary Sewer.** BMPs should also be employed during construction of sewer system upgrades.

**Electricity.** The City should work with the Snohomish County PUD to determine the extent, location and timing of substation improvements and undergrounding of lines necessary to support growth within the City Center.

**Telecommunications.** The City and affected utility provides should determine the appropriate timing of improvements and undergrounding of lines.

**Transportation**

The transportation systems impacts identified in the Draft SEIS will be addressed through a combination of construction of improvements, project level mitigation, ongoing planning and monitoring. Each of the City Center alternatives includes a package of transportation improvements that would mitigate identified impacts for 2010 and 2020; these would be part of whichever alternative is adopted by the City. The costs of facilities are not known in detail at this time; further engineering, financial and environmental analysis would occur when these facilities are planned and designed in detail. Some facilities – like the I-5 interchange improvements needed for Alternative C – would require forming partnerships with the state and/or federal governments, and would require extended lead time for implementation.
Mitigation for transportation impacts will likely involve a combination of development regulations and standards, capital improvements, land use changes (to increase transit use and decrease auto dependence). Project-specific requirements could include payment of development fees, construction of improvements, dedications of land, and similar techniques. Project-related conditions of approval/mitigation requirements will be identified in a planned action ordinance, if the City designates the City Center Plan as a planned action, or in development regulations.

The O.C. Preferred Alternative (B) and Alternative C assume that the City will pursue an aggressive program to institute parking charges for commuters, and will work with Community Transit and Sound Transit to increase transit service to the City Center. Charging for commuter parking is the most effective tool for increasing the use of transit and ridesharing.

D. Significant Unavoidable Adverse Impacts

Land Use. Existing land uses/buildings would be displaced to allow for City Center redevelopment. Some limited contrasts in land use intensity, bulk, and scale would occur in areas adjacent to the City Center.

Population, Housing and Employment. Growth of some type and form will occur within the City Center with or without a sub-area plan. Land developed for residential and employment uses will be unavailable for other uses. These changes are not necessarily adverse or unavoidable impacts; it is assumed that they would occur pursuant to adopted plans and policies and consistent with GMA requirements.

Aesthetics and Urban Design. While expected visual and aesthetic changes would be significant in degree and unavoidable if the sub-area plan is implemented, they are considered to be generally positive in nature. The mitigation measures described above, together with development regulations and design standards adopted to implement the plan, would be adequate to mitigate any probable significant adverse impacts. It is acknowledged that some viewers may perceive the change inherent in the alternatives to be adverse.

There could be some localized impacts, however, where buildings of significantly different height and scale abut smaller scale existing uses. These contrasts in height, scale, and intensity could occur between new buildings and older buildings in the City Center, or between new buildings and existing residential and commercial uses adjacent to but outside the City Center. While impacts could be reduced, some are inherent in the change that would occur and are unavoidable.

There may also be some unavoidable shading and shadowing impacts during some parts of the day during some times of the year, where new, larger buildings abut one another or are adjacent to proposed public spaces. These shading and shadowing impacts could occur between new buildings and older buildings in the City Center, or between new buildings and existing residential and commercial uses adjacent to but outside the City Center. Proposed parks and plazas could also be partially shaded during some periods of the day.
Public Services. Under any of the alternatives, population and employment growth will place increased demands on the City’s existing public services and facilities, creating a need for additional facilities, personnel, and equipment. Additional costs resulting from service increases will need to be planned for and funding sources will need to be identified.

Transportation. Future growth in the City Center will increase traffic volumes and congestion on area roadways, including regional facilities such as I-5 and I-405. Even assuming substantial increases in transit use and carpooling, increased traffic volumes are unavoidable. The number of traffic related accidents may also increase due to increased traffic.

E. Major Conclusions, Issues to be Resolved & Environmental Choices Among Alternatives

The City Center area is currently developed with impervious surfaces and suburban-scale commercial buildings. There is little vacant land and few natural features remaining. Over time, most environmental resources have been substantially altered. The area’s primary functions today include providing retail and service uses to the surrounding population, and serving as a regional transit and transportation hub.

The City Center is identified in Lynnwood’s Comprehensive Plan, adopted to comply with the Growth Management Act, as part of a “subregional center.” Such centers are lynchpins in the region’s strategy to accommodate growth at higher densities in identified urban areas, where services and facilities can be provided efficiently.

The Draft SEIS identifies numerous environmental consequences of growth in the City Center. To some extent, many of these impacts are characteristics of and inherent in urban growth, increased population and an expanding job base – e.g., land use contrasts, visual change, increased traffic, need for additional public services and facilities, and expansion of utility systems. There are not, however, significant differences among the alternatives in terms of environmental consequences, particularly in impacts to the natural environment. Differences are generally incremental variations in the degree of impact and are not markedly different in kind. Fiscal impacts are addressed in a separate study. The primary choices among the alternatives relate to Lynnwood’s vision of it’s future, the role it desires to play in the region, and the resources (financial and human) the City is able and willing to commit to accomplish its vision.
I. PROJECT DESCRIPTION & ALTERNATIVES

A. Proposed Action & Alternatives

The City of Lynnwood proposes to adopt a sub-area plan for the City Center, along with an initial package of development regulations, design guidelines and standards, and improvements to implement the plan. Lynnwood’s City Center is an approximate 300-acre triangular shaped area generally defined by 194th Street SW and 188th Street SW on the north, 33rd Avenue W on the east, Interstate 5 on the south, and 48th Avenue W on the west. The City Center represents a portion (approximately one-third) of the “sub-regional center” identified in the City’s Comprehensive Plan. This overall area is planned for increased development and diversification of land uses, including office, housing, mixed use development and transit facilities.

The sub-area plan will contain:

- goals, objectives and policies for redevelopment of the sub-area, addressing land use, housing, transportation, urban design, economic development and capital facilities/utilities;
- a land use map;
- urban design principles and policies standards and guidelines;
- a financial/fiscal framework to guide investment decisions; and
- recommended strategic projects and utility/capital improvements.

Adoption of the sub-area plan by the City Council will amend the City’s Comprehensive Plan. Development in the sub-area could also be designated as a planned action for purposes of subsequent project review and SEPA compliance.

A variety of tools will be required to implement the plan. These include changes to zoning classifications and amendment of the City’s zoning map; adoption of design guidelines and review processes specific to the City Center; and programs and actions to identify, finance and construct improvements. These programs will be adopted concurrent with the sub-area plan.

The Lynnwood Public Facilities District (PFD), a public entity incorporated pursuant to state law, is constructing a convention center on a site located within the City Center. Sound Transit is expanding the Lynnwood Park-and-Ride into a regional Transit Center. Those project proposals would occur within the City Center and are anticipated within the plan’s alternatives.
B. Overview of City Center & Surrounding Area

Existing Land Use Pattern

City Center

The City of Lynnwood is located along Interstate 5 in southwest Snohomish County, approximately mid-way between the cities of Seattle on the south and Everett on the north (See Figure 1-1). Lynnwood’s City Center abuts I-5 in the vicinity of the freeway interchanges with 44th Avenue W and 196th Street SW (SR-524). The City Center today is primarily a low-density, suburban commercial center with a diverse mix of retail, office, hotel, and service uses. 196th Street SW, a major arterial that traverses east-west through the heart of the City Center, collects traffic from Interstate 5 and Highway 99, and continues west to the City of Edmonds. Much of the commercial development along this route serves the high volume of traffic that passes through the area daily. Existing development along this arterial is primarily one- and two-story commercial buildings surrounded by asphalt parking lots.

Examples of retail uses in Lynnwood’s City Center include restaurants, auto- and furniture-related businesses, and both big-box and smaller-scale retail stores. Examples of service businesses in the area include hotels, dentist offices, and personal and business services. Table 1-1 shows the estimated number of businesses currently in the City Center.

Table 1-1
City Center – Existing Business and Employment

<table>
<thead>
<tr>
<th>Business Type</th>
<th>Number of Businesses</th>
<th>Number of Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail</td>
<td>149</td>
<td>2,176</td>
</tr>
<tr>
<td>Finance, Insurance, &amp; Real Estate</td>
<td>145</td>
<td>1,982</td>
</tr>
<tr>
<td>Services</td>
<td>250</td>
<td>1,862</td>
</tr>
<tr>
<td>Agriculture/Mining</td>
<td>2</td>
<td>24</td>
</tr>
<tr>
<td>Construction</td>
<td>13</td>
<td>215</td>
</tr>
<tr>
<td>Manufacturing</td>
<td>18</td>
<td>212</td>
</tr>
<tr>
<td>Transportation, Communications, &amp; Public Utilities</td>
<td>10</td>
<td>58</td>
</tr>
<tr>
<td>Wholesale</td>
<td>19</td>
<td>173</td>
</tr>
<tr>
<td>Government</td>
<td>9</td>
<td>152</td>
</tr>
<tr>
<td>Total</td>
<td>615</td>
<td>6,854</td>
</tr>
</tbody>
</table>

Source: Claritas; Huckell/Weinman Associates, 2003
There are approximately 615 businesses and 6,854 workers in the City Center (Claritas, 2003). Of the total number of businesses, approximately 41 percent are service-related (250 in all). Retail and finance-related businesses comprise the remaining majority of businesses in the area (around 150 each). The majority of jobs originate in the retail sector – 32 percent or 2,176 workers – half of which are created by eating and drinking establishments (1,063 workers). Finance and service businesses employ a slightly lower number of workers – each make up around 28 percent of the total number of employees.

The majority of office development is located in the northeast section of the City Center and includes buildings such as the Alderwood Business Campus, Lynnwood II Office Building, the Fisher Business Center, and the Lynnwood Financial Center. Older, lower-scale office space occurs in the central and southwest sections. Four hotels are also located in the City Center, two of which are adjacent to I-5.

The City Center also contains two public facilities that occupy large land parcels – the Lynnwood Park & Ride and the Lynnwood Justice Center. The Park-and-Ride is located at the southwest corner of the City Center; it provides parking and bus facilities for commuters traveling to Seattle, the east side of Lake Washington, and the University District. Sound Transit is expanding this facility into a regional Transit Center, with a direct connection to the HOV lanes on I-5, additional bus facilities, and increased parking. The Justice Center occupies the southern section of the Civic Center campus that extends north along 44th Avenue W. Other public uses in the area include two churches located off Alderwood Mall Boulevard.

Residential uses are currently limited. Three multi-family residential complexes are located in the northern City Center area. One multi-family complex is located at 194th Street SW and 40th Avenue W and another two are located between 36th Avenue W and Alderwood Mall Boulevard.

**Surrounding Area**

The City Center is surrounded by concentrations of residential, public, regional retail, and transportation uses. Several multi-family residential developments, at densities ranging from 12 to 20 units per acre, and typically two stories in height, border the City Center on the west (beginning at the Transit Center and continuing north past 196th Street SW) and on the north along 40th Avenue W. These residential developments separate and buffer the commercial area from surrounding single-family neighborhoods to the north and west. The maximum net density of the single-family areas is approximately five to eight units per acre.

The Lynnwood Civic Center campus adjoins the northern boundary of the City Center at the intersection of 194th Street SW and 44th Avenue W. The public campus contains the City Hall, justice center, other governmental offices/services, a library, a recreation center and a fire station. Most buildings are one story and are surrounded by an expanse of green lawns and trees.
The Alderwood Mall, adjacent to the northeast boundary of the City Center, is a regional shopping center that encompasses over 1,100,000 square feet. A significant expansion of the mall is under construction. Several other big-box retail stores extend from the Mall’s campus east and south across I-5.

More distant and to the west, the intersection of 196th Street SW and Highway 99 is another prominent commercial area, with two strip-retail shopping centers with grocery stores as anchor tenants. Development along the Highway 99 commercial corridor contains auto services, restaurants, and miscellaneous stores for neighboring communities and commuter traffic.

Other land uses located in the vicinity of the City Center include several parks and public facilities. Wilcox Park and Scriber Lake Park are two parks located west of the City Center along 196th Street SW. Pioneer Park is a neighborhood park located to the north, off 36th Avenue W. The regional Interurban Trail parallels Alderwood Mall Blvd and 200th Street SW along the eastern portion of the City Center.

Schools in the vicinity include Cedar Valley Community School to the west on 56th Avenue W and north of 196th Street SW, the Scriber Lake Alternative High School located at 52nd Avenue W and 200th Street SW, and Lynnwood High School and Athletic Complex north of the Alderwood Mall along 184th Street SW. Lastly, the Group Health Clinic, a regional medical facility, is located west of the City Center on 54th Avenue W south of 200th Street SW.

**Transportation System**

Interstate-5 borders the City Center area on the east and southeast. I-5 connects the region’s metropolitan areas and intersects with Interstate-405 approximately one mile north of the City Center. Highway 99, a major state route, extends in a north-south direction several miles to the west of the City Center. Both I-5 and SR 99 accommodate commuter traffic between Seattle and Everett. The arterial that traverses the Lynnwood City Center, 196th Street SW (SR 524), connects Interstate-5 (a full interchange) with SR-99. 44th Avenue W connects 196th Street SW with on- and off-ramps on I-5 (a half-interchange).

**C. Prior Planning and Environmental Review**

1. **Lynnwood Comprehensive Plan**

**Subregional Center**

The City of Lynnwood adopted a Comprehensive Plan complying with the Growth Management Act (GMA) in 1995. The Comprehensive Plan was prepared in the context
of the Multi-County Planning Policies, Countywide Planning Policies for Snohomish County, and Vision 2020. All of these policy documents are based on an urban centers concept, which directs and concentrates a significant portion of future population and employment growth into city centers and unincorporated activity centers at high densities.

The Land Use Element of the Lynnwood Comprehensive Plan includes a “Subregional Center” concept (see the discussion in the Plans and Policies section of this Draft SEIS). The objective of this concept is to promote the development of a mix of uses – commercial, residential, public and open space – in the Subregional Center to provide economic and redevelopment opportunities. Subregional Center policies provide the means to develop a “downtown” that combines the best aspects of a traditional central business district with current and future trends in transportation, shopping, employment, and living. Residents and employees in the City Center would have access to employment, shopping, transportation systems, and City services. At the same time, it would allow the City to accommodate new residents who are expected to move to Lynnwood in the coming years while maintaining the single-family character of existing neighborhoods. Identifying areas for mixed-use development with appropriate density and intensity levels is also encouraged within this area. Realizing the Subregional Center concept is one of the major objectives of implementing the Lynnwood Comprehensive Plan.

**Land Use**

Existing land uses are shown in Section II of the Draft SEIS. Land uses adjacent to the City Center include Low Density Single Family, Medium Density Multiple Family, and Public Facilities to the north, Medium and High Density Multiple Family to the west, Parks, Recreation and Open Space to the southwest, and Regional Commercial to the northeast. Interstate-5 creates a clear division from other commercial and single-family land uses located southeast of the interstate highway. Development includes significant expansion of the Alderwood Mall. Large scale retail development has occurred adjacent to the mall and east of I-5; this area is approaching build-out.

The Comprehensive Plan’s Future Land Use Map identifies an area somewhat larger than, but including the City Center sub-area, as the Subregional Center. The primary land use designations applied in the City Center include: Regional Commercial (RC), Office Commercial (OC), Business Technical (BT), Public Facility (PF), and Medium and High Density Multiple Family (MF 2 and 3).

**2. City Center Visioning & Public Involvement Process**

The Lynnwood Comprehensive Plan, adopted in 1995, designated a Subregional Center and established the concept of a mixed-use core or City Center within this portion of the City. Subsequent to adoption of the new city-wide plan, the Southwest Snohomish
County Chamber of Commerce established a Central Business District Task Force to examine issues associated with creating a City Center. The Chamber sponsored a series of public forums—including business owners, property owners, City officials and citizens— to develop a long-term “vision” for the City Center. To continue that work, the City, Chamber of Commerce and Public Facilities District (PFD) developed a scope of work and provided funding for development of a City Center plan. That planning effort began in the summer of 2001.

During formulation of the City Center Sub-Area Plan (January 28, 2003), the project partners have used a number of outreach and communication techniques, and various forums to identify issues and obtain input. These techniques have included: regular monitoring of project progress by an Oversight Committee; two public workshops; preparation of City Center newsletters and establishment of a website; meetings with community groups and organizations; regular briefings of the City Council, Planning Commission, Chamber and PFD; displays of project alternatives; and scooping/commenting opportunities in connection with the environmental impact statement. An early draft of this SEIS was also published to provide information and an opportunity for comment about environmental issues. Please refer to the Draft City Center Sub-Area Plan for further information about outreach efforts.

3. Environmental Review

Integrated Planning/SEPA Process

The City is integrating development of the City Center plan with the procedures, analyses and documents required by SEPA. This integrated approach is consistent with provisions in the SEPA Rules (WAC 197-11-210 et seq) which recognize that GMA planning and environmental review are interdependent and encourage them to occur together. The benefits of integrating planning and SEPA review include better-informed GMA planning decisions, reducing delay and duplication in project-level analysis, and narrowing the scope of environmental mitigation at the project level (WAC 197-11-210 (3)).

The SEPA rules for integration recognize that environmental review for GMA planning usually occurs in stages. The rules state that the environmental analysis that occurs at each stage of the process should address the environmental impacts associated with planning decisions at that particular stage (WAC 197-1-210 (3)). The timing of phased review, discussed later in this sub-section, may also be adjusted to track the phasing of GMA actions, such as adoption of sub-area plans, development regulations, and detailed capital improvements plans (WAC 197-11-228 (2)(b)).

Planning is, in general, an iterative process, i.e., concepts are suggested, analyzed, reviewed, discussed, modified, discussed again, analyzed again, changed again, and so on, until a proposal is adopted. Each iteration adds an increment of understanding, depth and detail. Some questions cannot be answered in detail until plan has been refined
through several iterations. Some systems (e.g., utilities) cannot be planned in detail until other elements of the plan have been defined.

EISs are also developed as part of an iterative process, involving preparation of draft and final documents and public review and comment. Proposals and alternatives can change from Draft EIS to Final EIS, as additional information is reviewed and public comments are considered. Using the principles of GMA/SEPA integration, EISs may be coordinated with planning projects to enrich the understanding and usefulness of both processes. Several provisions of the SEPA rules also encourage that environmental review begin as early as possible, so that environmental information can contribute to the substance of plans while they are still in the formative stage (WAC 197-11-055, 197-11-210, 197-11-228 (c)).

The current City Center plan alternatives and policies have been developed using the type of phased, iterative process described above. And that process is ongoing. For Lynnwood’s City Center, integration means that the steps of City Center planning are being closely coordinated with the SEPA process. The land use concept and policies of the City Center plan will be evaluated and tested in SEPA documents for the plan.

This Draft SEIS, for example, evaluates the environmental impacts of three different land use concepts and three different levels of redevelopment intensity, one of which (medium intensity) is identified as the “preferred” alternative of the City Center Oversight Committee (O.C.). In June, 2003, for purposes of SEPA analysis and to encourage public involvement, the City published an early, preliminary draft version of this document. It had identified the highest intensity City Center scenario (Alternative C) as the one preferred by the City Center Oversight Committee. This preference did not commit the City to any course of action. In the Draft SEIS, based on review of the Early Draft SEIS, a fiscal analysis, and public comment and discussion, the O.C. has identified the medium intensity scenario (Alternative B) as its preferred alternative. This growth scenario is also paired with a land use pattern (promenade with districts). Similarly, this preferred alternative is for purposes of ongoing discussion and analysis and does not commit the City to a course of action.

The Final SEIS responds to comments received on the Draft SEIS and provides additional information about the City Center Sub-Area Plan and implementation programs. The City will review these environmental and planning documents and select a preliminary/proposed City Center plan concept and policies for further refinement. This ensuing phase of the planning process will be focused on implementation efforts—development regulations, design guidelines, more detailed facility planning and engineering, financing plans, etc. Public review and comment will be integrated into this process as well.

Some implementation actions will be ongoing and will occur after initial plan adoption. This could include more detailed planning, financing, engineering and eventually construction of streets, utilities and capital facilities. As described further below, these
steps may be considered as distinct phases of planning and of environmental review. Public review and comment will also be incorporated into the implementation efforts.

**Supplemental EIS/Phased Review**

Draft and Final EISs for the Lynnwood Comprehensive Plan were published in 1995. As noted above, the Comprehensive Plan includes a subregional center that is substantially similar to the City Center. This EIS is being prepared as a supplement to the Comprehensive Plan EIS. It focuses on probable significant environmental impacts associated with differing patterns of development and intensity for a range of alternatives. Pursuant to the SEPA Rules and Lynnwood SEPA Ordinance, a supplemental EIS (SEIS) is appropriate to provide new information about a proposal’s significant environmental impacts (WAC 197-11-405(4)). The SEIS should not include analysis of alternatives or impacts that were addressed in the EIS being supplemented (WAC 197-11-620). This Supplemental EIS, and the City Center alternatives, also build on and rely on the numerous plans, studies and environmental documents that have been prepared for proposals in and around the City Center.

- *2020 Comprehensive Plan Environmental Checklist [2001]*
- *Regional Express Lynnwood Project, Environmental Assessment, June 2000.*
- *City of Lynnwood Comprehensive Sewer Plan.* February 1999.

This document supplements the EIS prepared for the City’s Comprehensive Plan. For purposes of SEPA compliance, the City is also adopting the above-referenced Regional Express Environmental Assessment and the I-5/196th Street Interchange EIS. Information in the other documents referenced above is incorporated by reference as appropriate and where indicated. A fiscal analysis has also been prepared to provide information for decision making.

The City is following a course of phased environmental review for its Comprehensive Plan and City Center Plan, pursuant to the state SEPA rules (WAC 197-11-060(5)(b)) and Lynnwood’s SEPA ordinance. Phased review allows agencies and environmental documents to focus on those issues that are ready for decision at a particular point in a decision making process and to defer detailed consideration of other issues until a later point in time (WAC 197-11-060(5)(b)). The appropriate sequence of analysis cited in the rules is from a proposal at an early or conceptual stage of planning or design – such as the 1995 Comprehensive Plan – to a subsequent environmental document at a later
(implementation or project) stage, when more detailed information is available – such as this more detailed sub-area plan (WAC 197-11-060(5)(c)(ii)). The rules direct agencies to avoid duplication and excess paperwork by using the appropriate environmental document in the circumstances, and by using existing environmental information (WAC 197-11-060(5)(f)).

**Scope of SEIS**

The scope of review is based on an assessment of probable significant adverse impacts that may result from the proposal, to the extent they have not been addressed in prior SEPA documents. The City followed the procedures for determining the scope of an environmental impact statement set forth in WAC 197-11-360, -408, and -443. The City determined the scope of the SEIS based on comments submitted by interested agencies, tribes and citizens, its own estimation of potential impacts and reasonable alternatives for the City Center Plan, and consideration of existing environmental documents. A determination of significance/scoping notice was published on September 14, 2001. Environmental issues addressed in the SEIS include land use, transportation, aesthetics, plants and animals/fisheries, wetlands, and public services and utilities. After reviewing relevant environmental documents, the City determined that impacts for other elements of the environment – earth, air quality, noise, historic resources – would be substantially the same as those evaluated in the Comprehensive Plan EIS or other existing environmental documents; supplemental analysis was not, therefore, required.

A more detailed discussion of air quality impacts is being deferred, consistent with the rules for phased review, until further direction on the City center Plan alternatives is established and improvement projects are planned in greater detail. The greatest contributor to potential future air quality impacts will be vehicular traffic. Existing environmental documents identify that air quality will deteriorate as planned growth (which included the City Center, which was contemplated in the Comprehensive Plan) occurs. Significant traffic congestion in the City is a result of background growth and pass-through traffic. Mitigation of traffic and air quality impacts will require a program of road improvement projects. The City Center sub-area plan, and the traffic analysis in this SEIS, will identify a potential package of such improvements, which will then undergo additional planning, analysis and testing (e.g., financial and engineering feasibility). The package of improvements that emerges from this process will then be planned, designed and further evaluated for environmental consequences. Improvements will also need to be included in the PSRC’s regional transportation program. An air quality conformity analysis, as required by WAC 173-420-100, will be performed in the context of this supplemental planning. It is appropriate to defer this analysis because air quality conformity analysis requires detailed design information (e.g., intersection geometry, signal phasing, etc.) which is not available at this stage of planning.

**D. Planned Action**
The City of Lynnwood is considering designating the study area as a "planned action" pursuant to the State Environmental Policy Act (SEPA) and implementing rules (RCW 43.21C.031(2)(a) and WAC 197-11-164). The City Center SEIS has been prepared to support a planned action designation, if the City Council determines to proceed with this approach. If it adopts a planned action, the City will follow applicable procedures, described generally below, to review proposed projects within the City Center area, to determine their consistency with the approved sub-area plan, development regulations and mitigation measures, and to impose any appropriate development conditions.

Planned actions are types of project proposals located within a designated portion of an Urban Growth Area. Qualifying projects include those that are identified in, consistent with and implement a sub-area plan and whose probable significant environmental impacts have been adequately addressed in an EIS prepared for the sub-area. To designate a planned action, a city must adopt an ordinance or resolution that describes the types of projects to which the planned action applies and how the planned action meets the criteria in the SEPA Rules (WAC 197-11-168). It also must specifically find that the environmental impacts of the planned action have been identified and adequately addressed in the SEIS. It should also identify any specific mitigation measures that must be applied for a project to qualify as a planned action. The ordinance may also specify a time period that will apply to the planned action.

When an implementing project is proposed, the City must follow review procedures set forth in the SEPA Rules. It must first verify that the proposal is the type of project contemplated in the planned action ordinance and that it is consistent with the applicable sub-area plan. It must also determine that the probable significant adverse environmental impacts of the planned action project have been adequately addressed in the planned action SEIS and that it contains any applicable conditions or mitigation measures. If the proposal meets this test and qualifies as a planned action, no SEPA threshold determination or further environmental review is required. The City may, however, require additional environmental review, and require additional mitigation, if probable significant adverse environmental impacts were not adequately addressed in the planned action SEIS or if the proposed project does not qualify as a planned action.

E. City Center Plan Alternatives

This SEIS considers a range of alternatives, which embody different spatial patterns of future land use in the City Center. The alternatives also reflect varying amounts, mixes, intensities and footprints of land use and redevelopment that could occur within the sub-area. All alternatives address the same geographic area. Tables 1-2, 1-3, 1-4, 1-5 and 1-6 provide a summary of the development program/concept considered for each alternative. The City Center plan will establish long-term policy direction for desired change within the City Center. It would remain in effect unless and until revised by the City Council. The 20-year development period (approximately 2020) identified in the EIS is to help identify probable impacts within a reasonable time period.
The amounts of development shown in Table 1-2 for each alternative are considered to be maximums for the purpose of SEPA analysis. They reflect a best guess but hypothetical development scenario based on anticipated market and economic conditions over a 20-year period. They do not reflect build out. Development could occur anywhere within the City Center, subject to the quantitative estimates for various uses. Development could occur faster or more slowly than reflected in the estimates.

Table 1-2
Lynnwood City Center Intensity Scenarios – 20-Year Development Estimates

<table>
<thead>
<tr>
<th>Land Use</th>
<th>No Action</th>
<th>Alternative A – Low Intensity</th>
<th>O.C. Preferred Alternative* – Medium Intensity</th>
<th>Alternative C – High Intensity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office¹</td>
<td>1.6 mil sf</td>
<td>4-8 story</td>
<td>2 mil sf</td>
<td>5-10 story</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>15-34 story **</td>
<td></td>
</tr>
<tr>
<td>Retail²</td>
<td>1.5 mil sf</td>
<td>1-2 story</td>
<td>1.5 mil sf</td>
<td>1-2 story</td>
</tr>
<tr>
<td>Residential³</td>
<td>128 du</td>
<td>.2 mil sf</td>
<td>2.4 mil sf</td>
<td>3.6 mil sf</td>
</tr>
<tr>
<td></td>
<td>(existing)</td>
<td>2,000 du</td>
<td>3-4 story</td>
<td>3,000 du</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>30-40 du/acre</td>
<td>50-70 du/acre</td>
</tr>
<tr>
<td>Total</td>
<td>3.3 mil sf</td>
<td>5.9 mil sf</td>
<td>9.1 mil sf</td>
<td>12.3 mil sf</td>
</tr>
<tr>
<td>New 2020 Development</td>
<td>0.6 mil sf</td>
<td>3.4 mil sf</td>
<td>6.6 mil sf</td>
<td>9.9 mil sf</td>
</tr>
</tbody>
</table>

Source: City of Lynnwood, LMN Architects, 2002.

Table Notes:
* O.C. Preferred Alternative = Oversight Committee’s Preferred Alternative.
** Draft development regulations provide these heights as of right, with the potential to increase heights by up to 70 percent using bonus provisions for architectural elements and contributions to parks and/or cultural facilities.
¹ Includes approximately 1 million sf of existing office development. New development includes convention center and civic uses.
² New retail development would replace existing retail for all Alternatives.
³ Residential shown in all alternatives except No Action is new. Note that Comprehensive Plan policies indicate that residential uses should occur in the City Center. However, existing zoning does not currently permit residential uses.

The time required to build-out the City Center plan under any of the alternatives is uncertain; it is beyond the 2020 horizon date of the sub-area plan and beyond the scope of the present analysis. Each alternative estimates an amount of development that could occur by 2020. The rate and amount of development would be determined by market conditions, local and national economic conditions, and the decisions of individual property owners. For purposes of the SEPA analysis (and if a planned action is pursued), the type and amount of development assumed for each alternative is considered an upper limit or threshold. The City Council has expressed its intention to periodically evaluate plan implementation and the SEIS analysis and to update the SEIS as necessary (Ordinance No. 2426). (LMC 17.02.025/027)
Table 1-3
Lynnwood City Center Land Use Alternatives – 2020 Land Uses (Acres)

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Existing Land Use</th>
<th>No Action</th>
<th>Alternative A – Low Intensity/ East West Spine</th>
<th>O.C. Preferred Alternative (B) – Medium Intensity/ Promenade with Districts</th>
<th>Alternative C – High Intensity/Four Square</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office&lt;sup&gt;1&lt;/sup&gt;</td>
<td>55</td>
<td>63.5</td>
<td>35</td>
<td>34</td>
<td>35</td>
</tr>
<tr>
<td>Retail&lt;sup&gt;2&lt;/sup&gt;</td>
<td>152.5</td>
<td>130</td>
<td>36</td>
<td>35</td>
<td>30</td>
</tr>
<tr>
<td>Office/Retail (mixed)</td>
<td>0</td>
<td>0</td>
<td>47</td>
<td>47</td>
<td>50</td>
</tr>
<tr>
<td>Residential&lt;sup&gt;3&lt;/sup&gt;</td>
<td>8</td>
<td>8</td>
<td>31</td>
<td>43</td>
<td>36</td>
</tr>
<tr>
<td>Parks/Open Space</td>
<td>0</td>
<td>0</td>
<td>12</td>
<td>15</td>
<td>19</td>
</tr>
<tr>
<td>Civic/Public&lt;sup&gt;4&lt;/sup&gt;</td>
<td>3</td>
<td>17</td>
<td>18</td>
<td>17</td>
<td>17</td>
</tr>
<tr>
<td>Cultural/Recreational</td>
<td>0</td>
<td>0</td>
<td>1.5</td>
<td>2.5</td>
<td>2.5</td>
</tr>
<tr>
<td>Hotel</td>
<td>8</td>
<td>8</td>
<td>16</td>
<td>11</td>
<td>15</td>
</tr>
<tr>
<td>Park and Ride</td>
<td>12</td>
<td>12</td>
<td>12</td>
<td>12</td>
<td>12</td>
</tr>
<tr>
<td>Existing Streets/ROW</td>
<td>53.5</td>
<td>53.5</td>
<td>53.5</td>
<td>53.5</td>
<td>53.5</td>
</tr>
<tr>
<td>New Streets</td>
<td>0</td>
<td>0</td>
<td>30</td>
<td>22</td>
<td>22</td>
</tr>
</tbody>
</table>


Table Notes:
1 Some existing office would be developed as mixed use, i.e., office/retail.
2 Retail listed under all Alternatives would replace existing retail.
3 Residential listed in all Alternatives is all new development. No new residential assumed for No Action.
4 Includes proposed Convention Center.

For purposes of analysis in the SEIS, future development is assumed to occur in the City Center districts (Core, West End, North End) in the relative proportions shown below. These numbers are approximations and reflect allocations of total planned development by type to the various districts. A greater or lesser amount of development could occur within each district, however, subject to the overall maximum established for the City Center in each alternative. As part of its review of specific development proposals, the City would determine whether proposed development within each district is within the analysis of impacts contained in the SEIS. Note that the No Action alternative would not use districts to organize land uses. Permitted land uses (generally retail and office) could occur anywhere within the City Center based on existing land use and zoning designations.

The public/private Oversight Committee’s Preferred Alternative (O.C. Preferred Alternative) identified in the SEIS at this time (Medium Intensity) is provisional and reflects current consensus of the Committee. This amount of 20-year growth is combined with the promenade with districts land use pattern. Labeling it “preferred” at this time is for analysis purposes only and is not intended to suggest that a decision has been made by the City to adopt this alternative.
For purposes of SEPA analysis, and to test environmental outcomes, each intensity option is paired with a land use concept. However, any of the land use patterns could be combined with any intensity scenario as a result of the findings of the environmental review process and public input. It should also be noted that the land use concepts are quite similar, differing primarily in the location of parks and pedestrian connections. For most elements of the environment, the intensity of development will be the most significant determinant of impacts, rather than the land use concept.

The amount and form of retail development is constant across all scenarios. Redevelopment and intensification of existing retail uses in the City Center area is assumed to occur; most would relocate to mixed-use buildings (except No Action). The predominant low density retail character of the City Center would continue under No Action. Of the office development shown in Table 1-2, 1 million square feet represents existing development and the balance is redevelopment that would replace existing (commercial/retail) space. Substantially all residential uses would be new to the City Center (with the exception of a small number of units currently within the sub-area).

No Action, as defined in the Draft SEIS, reflects a continuation and slight intensification of existing land uses, development form and recent trends. The limited amount of residential development in the City Center in this alternative could make it more difficult for the City to achieve its GMA population targets. The City could consider rezoning to permit additional multi-family uses either within the City Center or elsewhere.

**Table 1-4**

<table>
<thead>
<tr>
<th>Land Use</th>
<th>West End</th>
<th>Core</th>
<th>North End</th>
<th>City Center Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail</td>
<td>600,000 sf</td>
<td>600,000 sf</td>
<td>300,000 sf</td>
<td>1.5 million sq. ft. (25%)</td>
</tr>
<tr>
<td>Office¹</td>
<td>170,000 sf</td>
<td>1,300,000 sf</td>
<td>530,000 sf</td>
<td>2 million sq. ft. (34%)</td>
</tr>
<tr>
<td>Residential</td>
<td>1,560,000 sf</td>
<td>600,000 sf</td>
<td>240,000 sf</td>
<td>2.4 million sq. ft. (41%)</td>
</tr>
<tr>
<td></td>
<td>1,300 du</td>
<td>500 du</td>
<td>200 du</td>
<td>2,000 du</td>
</tr>
<tr>
<td>Total²</td>
<td>2.3 mil sf.</td>
<td>2.5 mil sf.</td>
<td>1.1 mil sf.</td>
<td>5.9 million sq. ft.</td>
</tr>
</tbody>
</table>

*Source: Huckell/Weinman Associates, LMN Architects, 2002*

*Notes:*

¹ Includes commercial, hotel, and convention center uses.
² Exact proportions of land use may vary between districts.
Table 1-5
O.C. Preferred Alternative/Medium Intensity – District Land Uses

<table>
<thead>
<tr>
<th>Land Use</th>
<th>West End</th>
<th>Core</th>
<th>North End</th>
<th>City Center Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail</td>
<td>600,000 sf</td>
<td>600,000 sf</td>
<td>300,000 sf</td>
<td>1.5 million sq. ft. (16%)</td>
</tr>
<tr>
<td>Office</td>
<td>330,000 sf</td>
<td>2,600,000 sf</td>
<td>1,070,000 sf</td>
<td>4 million sq. ft. (44%)</td>
</tr>
<tr>
<td>Residential</td>
<td>2,340,000 sf</td>
<td>900,000 sf</td>
<td>360,000 sf</td>
<td>3.6 million sq. ft. (40%)</td>
</tr>
<tr>
<td></td>
<td>2,250 du</td>
<td>750 du</td>
<td>300 du</td>
<td>3,000 du</td>
</tr>
<tr>
<td>Total</td>
<td>3.3 mil sf</td>
<td>4.1 mil sf</td>
<td>1.7 mil sf</td>
<td>9.1 million sq. ft.</td>
</tr>
</tbody>
</table>

Source: Huckell/Weinman Associates, LMN Architects, 2002
Notes:
1 Includes commercial, hotel, and convention center uses.
2 Exact proportions of land use may vary between districts.

Table 1-6
Alternative C/High Intensity – District Land Uses

<table>
<thead>
<tr>
<th>Land Use</th>
<th>West End</th>
<th>Core</th>
<th>North End</th>
<th>City Center Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail</td>
<td>600,000 sf</td>
<td>600,000 sf</td>
<td>300,000 sf</td>
<td>1.5 million sq. ft. (12%)</td>
</tr>
<tr>
<td>Office</td>
<td>500,000 sf</td>
<td>3,900,000 sf</td>
<td>1,600,000 sf</td>
<td>6.0 million sq. ft. (48%)</td>
</tr>
<tr>
<td>Residential</td>
<td>3,120,000 sf</td>
<td>1,200,000 sf</td>
<td>480,000 sf</td>
<td>4.8 million sq. ft. (40%)</td>
</tr>
<tr>
<td></td>
<td>2,600 du</td>
<td>1,000 du</td>
<td>400 du</td>
<td>4,000 du</td>
</tr>
<tr>
<td>Total</td>
<td>4.2 mil sf</td>
<td>5.7 mil sf</td>
<td>2.1 mil sf</td>
<td>12.3 million sq. ft.</td>
</tr>
</tbody>
</table>

Source: Huckell/Weinman Associates, LMN Architects, 2002
Notes:
1 Includes commercial, hotel, and convention center uses.
2 Exact proportions of land use may vary between districts.

1. Land Use Districts

The three land use alternatives considered in the Draft SEIS explore different ways of arranging activities within the City Center using three districts. Each district has a dominant focus but is also characterized by a mix of land uses, as follows:

- **Core** – generally located between 194th Street SW on the north, Alderwood Mall Blvd and I-5 on the south, 36th/37th Avenue W on the east, and 44th Avenue W on the west. The Core contains the most intensive development, primarily office with some housing and street-level retail and public/open space uses. This district would also emphasize public and civic uses, parks, some larger retail uses (focusing on home furnishings) and hotels. A convention center developed and managed by the Lynnwood Public Facilities District (PFD) would be the centerpiece of the eastern portion of this district.

- **West End** – generally located between 194th Street SW on the north and the transit center on the south, and between 44th Avenue W on the east and 48th Avenue W on
the west. This district would have a residential focus (condos, apartments and townhouses), with retail uses (focused on food, personal services, and specialty shops), significant green spaces and a park, and a civic facility.

- **North End** – generally located between 188th Street SW on the north, 196th Street SW and Alderwood Mall Blvd on the south, 33rd Avenue W on the east and 36th Avenue W on the west. This area would continue to emphasize office uses, with some retail and services and residential.

The No Action alternative, which would not involve adoption of a sub-area plan, would not use districts to organize land uses (see Figure 2-3 in Section II of this Draft SEIS). Development would occur project-by-project in the pattern suggested by the existing Comprehensive Plan future land use map and existing zoning designations.

2. **Major Similarities and Differences Among City Center Alternatives**

- **North End Office Focus.** In all of the alternatives, the northeast portion of the City Center would be developed primarily with office uses. Some residential uses and retail uses in support of the convention center, are planned near 37th Avenue W and along the Alderwood Mall Boulevard. New streets and parks would also be developed in this area for the O.C. Preferred Alternative and Alternative C.

- **Convention Center.** Phases I and II of the convention center, as proposed by the Public Facilities District (PFD), is assumed to occur in all alternatives, including No Action. The first phase consists of an approximately 58,000 square foot convention center. It is expected to be completed in 2005. A 50,000 square foot expansion (Phase II) is also anticipated, possibly within five to seven years. Future projects on the PFD campus, whose timing is unknown at this time, could include an additional expansion of the convention center (depending on demand), a regional library or swimming pool, a community college facility or community theater.

- **Transit Center.** For all alternatives, land use in the Transit Center area could include multi-family residential and retail uses. Sound Transit is improving parking and bus facilities, HOV and bus access, and traffic circulation.

- **Linear Trails/Parks.** The Interurban Trail runs the length of the City Center area along the west side of Interstate-5. Several new small parks would be developed adjacent to the trail. The land use patterns for the O.C. Preferred Alternative and Alternative C also assume development of a pedestrian corridor (“promenade”) connecting the sub-districts. The promenade would be flanked by and connect to new parks in the City Center and would connect with the Interurban Trail.

- **New Street Network and Streetscape.** New streets and street improvements associated with the O.C. Preferred Alternative and Alternative C would be located generally as
shown in Figures 1-4 and 1-5. The new street pattern – consisting of an expanded internal street grid – is designed to improve vehicular and pedestrian circulation (using smaller blocks) and to calm traffic. Alternative A would have a similar street network. This new street network would not be developed with No Action; only currently committed improvements are assumed to occur. It is possible that a different street grid could occur in conjunction with future planning.

Parking would be provided through surface parking, and in parking garages (structured and/or below ground). In the near term, based on market conditions and land prices, underground parking may not be economically feasible. Parking approaches would, therefore, change over time – interim surface parking areas would eventually be replaced by parking structures and/or redeveloped with new buildings with underground parking.

Streets within the City Center Plan area would generally be pedestrian-oriented. This goal is balanced, however, with the need to move traffic. Please refer to Figure 1-2. Amenities along the streets would include widened sidewalks, plazas, trees, seating areas and distinctive lighting standards. The right-of-way for retail and office streets would be between 72 feet and 84 feet, with two traffic lanes with on-street parking. Major arterials/boulevards (44th Avenue W and 196th Street SW) would have a 106-foot right-of-way with six traffic lanes with a landscaped median. Boulevard streets would not have on-street parking. Residential/collector streets would be 70 feet wide, with two traffic lanes and on-street parking. All streets would have sidewalks on both sides (9 feet for residential streets, 7 feet for boulevards and 18 feet for the promenade) and landscaped areas (5-12 feet) (see Figure 1-2).

**Urban Design.** Urban design principals are identified in the draft Sub-Area Plan. They address and shape the siting, planning and design of the streetscape, public spaces, pedestrian connections, civic structures, public amenities, as well as building quality and materials within the City Center. An administrative design review process, pursuant to standards and guidelines, is also recommended to be established. Design guidelines would not be adopted under the No Action alternative.
FIGURE 1-2: STREET SECTIONS

Boulevards
106' R.O.W

Promenade Street
(198th Street)
88' R.O.W

New Collector Streets
70' R.O.W
3. **Major Features of Alternatives**

**No Action**

In the context of the City Center planning effort, the SEPA “no action” alternative does not mean literally “no development.” The City would need to take some action to implement the Comprehensive Plan’s Subregional Center concept to maintain consistency with its Comprehensive Plan and to avoid violating GMA requirements. These efforts would be less comprehensive and less coordinated, however.

Relative to the other alternatives, No Action would involve a small increment of change with respect to the amount and intensity of development. In general, the expected level of growth would be consistent with historical trends – it would reflect a small increase in office and institutional uses but no increase in residential population. Development would occur in a pattern similar to the existing situation. Density would increase over time. Since the City Center is substantially built out, change would occur through redevelopment.

Under the No Action Alternative, the City would not adopt a sub-area plan or new implementation tools (zoning, design guidelines) for the City Center. The existing Comprehensive Plan Future Land Use Map designations and zoning would remain essentially unchanged. Most new uses are assumed to be single function rather than mixed-use. More than 75 percent of the City Center is zoned Community Business, which encourages community-scale commercial development that serves the City of Lynnwood and neighboring communities. This zone does not limit the height of new development. Lot coverage is limited to 35 percent. Permitted uses include general retail trade/services, hotels/motels, and public facilities; housing is not a permitted use. Overall, the City Center would appear and function much as it does today. To accommodate adopted city-wide population targets, the City may need to consider applying additional multi-family zoning within the City Center or elsewhere.

Development and redevelopment would occur incrementally and would not be guided by a cohesive land use concept. Individual property owners would propose to redevelop according to land use and zoning designations, perceived market opportunities, and their individual goals and situations. Individual decisions would determine how and where various uses are concentrated. Land uses would not be focused or organized into districts with a distinct character.

The convention center proposal would proceed, as would possible transit-oriented redevelopment of Sound Transit’s park and ride lot. The convention center could attract some development on adjacent sites. This development might or might not be supportive of convention center activities.

Capital improvements would also occur incrementally. The street grid would not be improved and parks and trails would not be developed pursuant to a plan. Improvements
would occur in the context of project-by-project development. Few transportation improvements are assumed to occur.

Since there would not be a sub-area plan, this alternative could not be designated as a Planned Action. Future applicants would comply with SEPA for each individual project. Mitigation would also occur project-by-project.

A number of future scenarios are possible under No Action. Most probable is that existing/recent trends would continue, and future development would be similar in type, scale and character to what exists today. The City Center would continue to be dominated by suburban density retail uses. In general, redevelopment is anticipated to occur at a slower pace than the other alternatives because there would be few if any actions or investments undertaken by the City to encourage and further guide development in the City Center. In addition, there would not be a substantial near-by (i.e., within walking distance) population base to support services. It is also possible that the projected level of development might not be achieved, and the City could experience difficulty in meeting its employment objectives.

**Redevelopment Intensity.** No Action represents the smallest level of assumed redevelopment within the City Center. Land would be used inefficiently and the City Center would continue to be dominated by suburban-scale auto-orientated retail development.

Overall, development and redevelopment under this alternative is assumed to result in approximately 3.3 million square feet of development (1.4 million square feet of office, .2 million square feet of institutional, 1.5 million square feet of retail, and no new multi-family housing units) over a 20-year period. No Action would accommodate an estimated population of 289 people (existing) and 8,400 additional employees. Buildings height and scale could range from 1-2 story retail buildings to 4-8 story office buildings. This intensity of development, which is a modest intensification relative to existing conditions, could occur without adoption of a City Center plan, generally as a result of market forces.

**Alternative A – Low Intensity**

**Land Use.** The Alternative A land use plan – “East-West Spine” – is shown in Figure 1-3. The City Center would be organized into the three districts described previously. Each district would be characterized by a mix of uses, but each would also have a somewhat different focus.

The East-West Spine takes its name from a reconfiguration of 198th Street SW between 44th Avenue W to the west and 40th Avenue W to the east. It would serve as the spine of the Core area, along which the most intensive office buildings would locate. It would be redesigned to accommodate landscaping, pedestrians, street-level activities, and on-street parking, as well as vehicular traffic. See Figure 1-2 for a conceptual cross section of this
street. Retail uses would locate at the street level of these buildings; residential uses would be located at the northwest corner of 44th Avenue W and 196th Street SW. Several new parks would also be developed in this area—one at the corner of 194th Street SW and 44th Avenue W, one at the corner of 200th Street SW and 46th Avenue W, and one within the West End multi-family complex.

The eastern end of the Core would be anchored by a convention center along 196th Street SW, and would also include the hotels, retail, office, and multi-family residential uses. Ground level retail in mixed-use buildings would be located on the 198th Street SW east plaza facing 40th Avenue W. Significant retail concentrations would be located between 196th Street SW and Alderwood Mall Boulevard, as well as along 36th/37th Avenue W east of the convention center. Two new public parks would be developed. Multi-family residential would be located north of a new street crossing the northern edge of the Convention Center site.

The North End would contain office development, as described previously.

Redevelopment Intensity. Alternative A incorporates a “low” intensity development scenario, lower than the O.C. Preferred Alternative and Alternative B. It is assumed to result in development and redevelopment of approximately 2.0 million square feet of office, 1.5 million square feet of retail, and 2,000 multi-family housing units in the City Center over a 20-year period. Alternative A would accommodate an estimated population of 3,600 people and 3,000 additional employees. Building height and scale would range from 3-4 story residential buildings developed at 30-40 dwelling units per acre, to 5-10 story office buildings.

O.C. Preferred Alternative – Medium Intensity

A provisional, preliminary “preferred” alternative has been identified at this time for purposes of SEPA analysis and further discussion. It is an outgrowth of the City Center planning and discussion that has occurred to date. It also reflects a variation or recombination of elements of the land use pattern and concepts of the other alternatives.

Land Use. The central organizing concept for the O.C. Preferred Alternative is a large (3.4-acre) “Town Square” located within the Core between 198th Street SW to the north and 200th Street SW to the south, and between two new streets to the east and west (between 40th Avenue W and 44th Avenue W). A landmark building would be located north of the Central Park on 198th Street SW. The O.C. Preferred Alternative land use plan is shown in Figure 1-4.
street. Retail uses would locate at the street level of these buildings; residential uses would be located at the northwest corner of 44th Avenue W and 196th Street SW. Several new parks would also be developed in this area—one at the corner of 194th Street SW and 44th Avenue W, one at the corner of 200th Street SW and 46th Avenue W, and one within the West End multi-family complex.

The eastern end of the Core would be anchored by a convention center along 196th Street SW, and would also include the hotels, retail, office, and multi-family residential uses. Ground level retail in mixed-use buildings would be located on the 198th Street SW east plaza facing 40th Avenue W. Significant retail concentrations would be located between 196th Street SW and Alderwood Mall Boulevard, as well as along 36th/37th Avenue W east of the convention center. Two new public parks would be developed. Multi-family residential would be located north of a new street crossing the northern edge of the Convention Center site.

The North End would contain office development, as described previously.

**Redevelopment Intensity.** Alternative A incorporates a “low” intensity development scenario, lower than the O.C. Preferred Alternative and Alternative B. It is assumed to result in development and redevelopment of approximately 2.0 million square feet of office, 1.5 million square feet of retail, and 2,000 multi-family housing units in the City Center over a 20-year period. Alternative A would accommodate an estimated population of 3,600 people and 3,000 additional employees. Building height and scale would range from 3-4 story residential buildings developed at 30-40 dwelling units per acre, to 5-10 story office buildings.

**O.C. Preferred Alternative – Medium Intensity**

A provisional, preliminary “preferred” alternative has been identified at this time for purposes of SEPA analysis and further discussion. It is an outgrowth of the City Center planning and discussion that has occurred to date. It also reflects a variation or recombination of elements of the land use pattern and concepts of the other alternatives.

**Land Use.** The central organizing concept for the O.C. Preferred Alternative is a large (3.4-acre) “Town Square” located within the Core between 198th Street SW to the north and 200th Street SW to the south, and between two new streets to the east and west (between 40th Avenue W and 44th Avenue W). A landmark building would be located north of the Central Park on 198th Street SW. The O.C. Preferred Alternative land use plan is shown in Figure 1-4.
New office development (with the potential for mixed-use buildings including retail and/or residential) would be focused in the Core area between 194th Street SW and 200th Street SW. Retail uses would be located on the ground level of mixed-use buildings facing the park (along 198th Street SW and along the new north-south streets bordering the park up to 196th Street SW), with office and residential on the upper levels. A cultural or commercial center would be located on the south side of the park on 200th Street SW. Hotel uses are also possible within the Core area.

The Convention Center would provide an anchor and serve as a catalyst for development in the east end of the Core. Development around the Convention Center would also include a smaller hotel area, a larger retail area, mixed-use office along 40th Avenue W, and residential uses. A new plaza directly south of the Convention Center would front 196th Street SW between 40th and 37th Avenues West. Retail development is also assumed in the eastern portion of the Core, generally east of 40th Avenue W, and south of 196th Street SW to the Alderwood Mall Parkway.

The West End would focus on multi-family residential uses. Retail and office uses would also be located in this district, some possibly located along 196th Street SW and 44th Avenue W. Two new parks/plazas would be developed in this area – one at the southwest corner of 194th Street SW and 44th Avenue W and one within the multi-family area. A new civic building and a local transit center would be located at the northwest corner of 44th Avenue W and 196th Street SW.

The North End would primarily contain office development, as described previously.

**Redevelopment Intensity.** The O.C. Preferred Alternative incorporates a "medium" intensity development scenario, mid way between Alternative A and Alternative C. It is assumed to result in development and redevelopment of approximately 4 million square feet of office, 1.5 million square feet of retail, and 3,000 multi-family housing units in the City Center over a 20-year period. The O.C. Preferred Alternative would accommodate an estimated population of 5,400 people and 9,000 new employees. Building height and scale would range from 5-13 story residential buildings developed at 50-70 dwelling units per acre, to 15-34 story office buildings. As proposed in draft City Center development regulations, building heights could be increased (by 70 percent, to a maximum of 595 feet) through use of bonuses available for architectural elements and/or contributions to parks and cultural facilities. Building height and scale would be similar to Alternative C.

**Alternative C – High Intensity**

**Land Use.** The Alternative C land use plan is shown in Figure 1-5. The City Center would be organized into three districts as described previously. A mix of uses would characterize all districts, but each would have a somewhat different focus.
Similar to Alternative A, a central organizing concept for Alternative C is the reconfigured 198th Street SW between 44th Avenue W to the west and 40th Avenue W to the east, anchored by public plazas/squares at each end. Alternative C expands on this concept with a new north-south street to be developed between 196th Street SW to the north and 200th Street SW to the south.

Similar to Alternative A, the most intensive mixed-use development (office, retail and/or residential) would be focused in the Core area. Retail (i.e., shops and services) would be located on the ground level while office and residential uses would be located on the upper levels. Ground level retail would face major streets and plazas, including 198th Street SW and along the new north-south street. A cultural or commercial “attractor” would be located on 198th Street SW. Hotel uses would be developed at the southern portion of the Core area around the southern public square.

The public square on the west end of the new 198th Street SW would provide an anchor for the West End. Low-rise to mid-rise multi-family residential would be located between 194th Street SW to the north and 200th Street SW to the south adjacent to the Transit Center, and 44th Avenue W to the east and 48th Avenue W to the west. In contrast to Alternative A, retail uses in this area would be more significant, mainly along major traffic streets – 196th Street SW and 44th Avenue W, primarily on the exiting Fred Meyer site – and in mixed-use building around the square. Two new parks would be developed in this area – one at the corner of 196th Street SW and 44th Avenue W and one at the corner of 200th Street SW and 46th Avenue W. A new civic building would be located at the southwest corner of 44th Avenue W and 198th Street SW.

As with Alternative A, the Convention Center would anchor the eastern end of the Core. The area would also include hotels, retail, mixed-use office, and residential uses. Ground level retail would face the 198th Street SW eastern square in mixed-use office buildings. Several new parks, including the 198th Street SW eastern square and two parks located on 196th Street SW on either side of the Convention Center, would be developed in this area. Multi-family residential buildings would be located on a new street crossing the northern edge of the convention center site. A large area for a potential hotel would be located to the east of the 40th Avenue W square.

The North End would develop primarily for office uses as described previously.

Alternative C includes four primary public spaces – the squares at the ends of the two main spines, and seven other smaller parks (see Figure 1-5). The public square concept would be landscaped with trees and lawn areas. Mixed-use development (hotels and shops on the east and retail on the west) around the two squares anchoring the 198th Street SW parkway is intended to encourage day and nighttime pedestrian activity.
**Redevelopment Intensity.** Alternative C includes the most intensive development scenario considered, with the highest population and employment growth and the largest buildings. It is assumed to result in development and redevelopment of approximately 6 million square feet of office development, 1.5 million square feet of retail development, and 4,000 multi-family housing units in 20 years. This intensity would accommodate an estimated population of 7,200 people and 15,000 new employees. Building height and scale would range from 5-13 story residential buildings developed at 50-70 dwelling units per acre, to 15-34 story office buildings. As proposed in draft City Center development regulations, building heights could be increased (by 70 percent, up to a maximum of 595 feet) through use of bonuses available for architectural elements and/or for contributions to parks and cultural facilities.

**F. City Center Plan Policies & Design Principles**

The draft City Center Sub-Area Plan identifies over-arching objectives, planning and urban design principles, key concepts and sub-area policies. Development of the plan is ongoing and is being integrated with the SEPA process. Some policies and program elements (i.e., transportation, capital facilities, economic development, and financial/fiscal) will be developed based on the conclusions of the SEPA analysis and fiscal study, as well as the input of interested citizens. Similarly, implementing regulations will take their direction from environmental information and decisions regarding these plan elements. The outline below, therefore, is based on a work in progress and a process that is integrating SEPA with planning, pursuant to WAC 197-11-210.

The sub-area plan (August 2004 draft) is based on the present O.C. Preferred Alternative, but could also apply to Alternatives A or C. It would not apply to No Action, which assumes that a sub-area plan would not be adopted.

**Objectives**

1) Restructure the City Center’s growth toward a more concentrated, mixed-use, pedestrian friendly and transit supportive center.
2) Creatively implement the City’s Comprehensive Plan.
3) Validate and advance the long-term vision of the City Center Task Force.
4) Develop a distinct, strong, identity for the Lynnwood City Center.
5) Attract new interest, investors and customers to the City Center.
6) Create an attractive, functional, and comfortable place for Lynnwood citizens.
7) Establish a set of strategies to guide this transformation through Lynnwood’s future.

**Planning & Urban Design Principles**

The following principles provide a framework for the sub-area plan’s policies and implementing actions.
1) Concentrate commercial activity at greater intensity, and in several land use districts, to create a critical mass.

2) Reinforce investments in public facilities to serve the public and stimulate private actions.

3) Functionally and visually connect the Civic Center to the City Center.

4) All development (public and private) should create public places (e.g., plazas, squares, courtyards and parks) where possible, including one large, centrally located civic space.

5) Humanize streets within the City Center through generous sidewalks and street trees.

6) Tame traffic through use of tools that manage traffic (e.g. turning movements and signal timing) and protect adjacent neighborhoods.

7) Provide transit connections to other parts of the City and to the region.

8) Over time, transition surface parking to structured parking (above ground and below ground).

9) New development should display quality and character through architectural expression.

10) Accommodate all modes of transportation (autos, buses, ridesharing, walking and bicycles).

11) Building frontages should incorporate combinations of uses, amenities and architectural details that are appealing to pedestrians.

12) The City’s skyline should evolve incrementally into a highly visible symbol of commerce and vitality.

13) Seek and encourage the participation of public agencies, private businesses, institutions and developers in developing and marketing the City Center.

14) Protect adjacent residential neighborhoods from traffic and other spill-over effects.

15) City Center regulations should emphasize incentives, along with baseline standards.
Key Concepts

Building on the constraints and opportunities presented by conditions in the City Center, and the overarching objectives stated previously, the draft plan identifies a number of key concepts that will be embodied in sub-area policies.

1) Improve connectivity by creating an additional secondary street network. This will add east-west and north-south connections, reduce distances between blocks, make the City Center more walkable, disperse traffic from major arterials, and provide greater choices for circulation.

2) Identify City Center “gateway” locations that will include landmark-type structures, significant buildings and landscaping and provide orientation and identity.

3) Integrate the Interurban trail into the City Center, make it accessible, and provide green spaces to connect it to the City Center.

4) Develop one portion of the City Center as a “core” where commercial development will be concentrated and developed at higher densities. Incorporate street-level uses to animate the pedestrian environment. Include a central attraction, such as a major cultural or recreational destination.

5) Surround the core with supporting land use districts that have their own functions and character. *East* – a new convention center and a mix of lower intensity office, retail and hotel uses. *North End* – office infill and enhancements. *West* – concentrated urban residential uses with local retail services and neighborhood parks.

6) Identify sort-term demonstration projects that can act as catalysts – e.g., mixed-use housing, a civic park, a convention center, and streetscape improvements on major streets.

7) Enhance existing streets using generous sidewalks, street trees and furnishings, artwork and pedestrian-scale lighting.

8) Create a series of visible and accessible parks and public spaces that will connect different activities, uses and other parks.

9) Extend civic facilities into the City Center.

10) Create a transition to surrounding residential areas.
Sub-Area Policies

The Draft City Center plan is based on establishing three distinct sub-districts, each having its own emphasis and character – West End, Core and North End. Please refer to the previous description of the boundaries, emphasis and functions of each district. Policies, design guidelines and regulations/incentives will reflect the objectives and desired intensity and character of development in each district.

Land Use Policies

CCLU 1. Establish Mixed-Use Districts. Each district should allow a mix of retail, office, services and residential uses; the degree of mix and permissible heights and intensity will differ according to the intent of the district.

CCLU 2. Concentration and Intensity. The City Center will be the focus of high concentrations and intensities of land use, containing multi-story buildings, high density residential development, parking structures, and a variety of civic buildings and structures.

CCLU 3. Establish Maximum Floor Area Ratios (FAR) to Direct Intensity. Maximum FAR could range from 8-10 in the Core and 3-5 outside the Core. These could be increased somewhat if developments contribute to funding parks and public buildings within the City Center.

CCLU 4. Incentives for Public Amenities. Regulations should grant additional development intensity in return for including specified public amenities.

CCLU 5. Adopt Design Standards and Guidelines. Amend the current City-Wide Design Guidelines to include a section on the City Center that specifically addresses subjects such as pedestrian-orientation, building mass and skyline treatment.

CCLU 6. Provide a Transition to Neighborhoods Outside the City Center. Allowable building heights should be graduated down and buildings set back where the perimeter of the City Center is adjacent to low intensity residential.

CCLU 7. Phase Out Free-Standing Signs and Billboards. The City should adopt an amortization period for removal of free-standing signs that do not comply with new standards.
Housing

CCH 1. Encourage Urban Residential Development Within the City Center. Floor area ratios and building heights should allow for high density residential development.

CCH 2. Variety of Housing. The City should encourage a wide range of housing types and densities within the City Center.

CCH 3. Quality in Design and Amenities. Incentives and standards should be devised to ensure that higher density development is livable, permanent, and contributes positively to the image of Lynnwood in general and the City Center in specific.

CCH 4. Partnerships. The City, other government agencies, non-profits and for-profit developers should consider ways of jointly developing housing within the City Center.

Transportation

CCT 1. Minimize Driveway Access. Minimize driveway access with curb cuts along Principal and Minor Arterials as a means of increasing vehicle carrying capacity and operational efficiency.

CCT 2. Coordinate Signals. Optimize traffic operation by coordinating intersection signals along Principal arterials. Signal cycle settings should be focused on achieving the network operation optimization rather than optimizing each individual intersection.

CCT 3. Maintain LOS E. Maintain LOS E as the level of service standard for the arterial intersections in the City Center, superceding the Comprehensive Plan standard for the rest of the City. The City should use the most up to date level of service calculation methods from the Highway Capacity Manual issued by the Transportation Research Board (definitions and calculations are periodically modified).

CCT 4. Monitor LOS. Regularly monitor LOS at arterial intersections. If the monitoring shows that LOS E cannot be maintained, consider reprioritizing the City's capital program to accelerate investments on transportation facilities developed for the City Center plan, and reduce vehicle travel demands in the City Center by adopting travel demand management strategies.

CCT 5. Coordinate State Facilities Improvements. Work with WSDOT to construct the following improvements on State facilities:
- Widen 196th Street SW to 7 lanes from 48th Avenue W to 37th Avenue W
• Widen northbound 44th Avenue W to add a through lane from I-5 to 194th Street SW

The following may be needed after 2020:
• Connecting ramp from southbound I-5 to westbound SR 525
• Northbound on-ramp to I-5 from 44th Ave W
• Southbound off-ramp from I-5 to Alderwood Mall Blvd or 44th Ave W

CCT 6. Develop a Finer Grid System. Develop a program and regulations to develop a finer street grid system within the City Center. The grid system should improve access within the City Center and continuously connect the arterials, where feasible.

CCT 7. Improve Arterials. Improve the following arterials to increase the capacity of the transportation system:
• Build 179th Street SW (Maple Road) as a 2 lane road, without on-street parking, between 36th Avenue W and Alderwood Mall Parkway
• Widen 36th Ave W from 3 lanes to 5 lanes from 179th Street SW to 164th Street SW
• Widen 200th Street SW to 5 lanes from 48th Avenue W to SR 99

CCT 8. Improve Signalized Intersections. Improve the following signalized intersections to add capacity:
• Add a second “left-turn only” lane to westbound approach and eliminate a “split” signal phasing at the 200th Street SW and 44th Avenue W intersection
• Add a second “left turn only” lane for the northbound approach at the 196th Street SW and 44th Avenue W intersection

CCT 9. Unsignalized Intersections. Improve the following unsignalized intersections by adding traffic signals.
• 48th Avenue W and 194th Street SW intersection
• 40th Avenue W and Alderwood Mall Boulevard/200th Street SW intersection

CCT 10. Control Traffic on Local Streets. Develop a program to control traffic on the local streets in the residential neighborhoods surrounding the City Center.

CCT 11. Reduce Vehicle Trips. Work with City Center property and business owners to develop and implement effective vehicle demand management strategies to reduce vehicle trips generated by commuting City Center workers.
CCT 12. Increase Transit Services. Work with Community Transit and Sound Transit to increase transit services for the City Center.

CCT 13. Provide Medians. Provide medians and other devices on arterials to aid pedestrians crossing the street.

CCT 14. Bicycle Linkages. Identify opportunities to provide bicycle linkages between the City Center, the Interurban Trail and other key bicycle routes.

CCT 15. Bicycle Storage. Provide bicycle storage facilities or bike racks at the transit center and other destinations within the City Center.

CCT 16. Parking Requirements. Establish parking requirements specifically for developments in the City Center, which are aimed at achieving land use and transportation goals.

CCT 17. Develop a Parking Market. Consider reducing the parking supply requirements for office developments to develop a parking market.

CCT 18. Parking Supply Requirements. Adopt minimum and maximum parking supply requirements for such uses as office, retail and residential. Develop a schedule to review the maximum and minimum parking supply requirements.

CCT 19. Mixed-Use Development. Allow-mixed use development to provide reduced parking supply.

CCT 20. Shared Parking. Encourage shared use of parking among businesses and property owners through a provision allowing them to reduce parking supply.

CCT 21. Develop a City Center Parking Management Plan. The plan should address:

- on-street parking locations and enforcement
- use of excessive parking spaces for public parking
- options to provide parking through public parking structures
- possible locations for pedestrian and circulator connections between parking structures and destinations
- a program to manage parking in residential areas.

CCT 22. On-Street Parking. Provide on-street parking on non-arterial streets within the City Center for short-term parking users only, such as visitors and shoppers. Develop an effective parking enforcement program.
Urban Design

CCUD 1. Streets as Urban Design Elements. As streets are built or reconstructed, elements such as planted medians, curb bulbs, crosswalks, banner stanchions, and artwork should be considered for inclusion.

CCUD 2. Establish Streetscape Standards. Standards should address the width of sidewalks, the spacing, size and type of street trees, pedestrian-scaled lighting, and other street furnishings to create safe, comfortable and an appealing place for pedestrians.

CCUD 3. Adopt Design Guidelines. Design standards that address site design, building design and sign design should be created for the City Center. Such standards should include the following:

- requiring transparent glass windows and pedestrian amenities (such as weather protection) along the sidewalk on pedestrian-oriented streets
- minimize curb cuts
- prohibiting parking lots in front of buildings

CCUD 4. Achieve a Variety of Public Spaces. The City Center should contain a range of public spaces, from larger to smaller, both green and hard-surfaced, and both publicly and privately provided.

CCUD 5. Promenade. Over time, there should be a number of public spaces located along a meandering alignment weaving through all three districts of the City Center.

CCUD 6. Promote Many Pedestrian Connections within the City Center. The City Center should include many types of corridors conducive to walking, including sidewalks, trails, through-block connections, and walkways through new development.

CCUD 7. Connect to Surrounding Areas and Features. Development within the City Center should connect to adjacent neighborhoods as well as to the Interurban Trail and nearby Parks.

CCUD 8. Pedestrian Circulation Primarily at Grade. Grade-separated pedestrian connections (overpasses and underpasses) should be discouraged. However, there may be some locations where pedestrian bridges are appropriate.

CCUD 9. Designate and Describe Gateway Treatments. Locations of gateways should be established, along with the nature of planting, lighting and signage that would reinforce the sense of entering the City Center.
CCUD 10. Consider Civic Structures as Landmarks. New public buildings should be prominently located and display unique design features that convey their importance to the community.

CCUD 11. Transit Shelters and Design Features. Transit shelters should not be considered merely utilitarian structures but should convey a strong design identity and incorporate features such as artwork.

CCUD 13. Incentives for Public Amenities. The Land Use Code for the City Center should offer additional development intensity in return for providing accessible and well maintained public amenities. Development intensity may increase through FAR bonuses and/or height bonuses.

CCUD 13. Variety of Public Space. All new public or private development shall contribute to an array of public spaces including plazas, squares, courtyards and parks. These public spaces should include benches, lighting and other pedestrian amenities necessary for the public's safe use and enjoyment.

CCUD 14. Integrating Interurban Trail. The Interurban Trail should be integrated into the City Center. The trail should include small parks and trailheads where appropriate to make access safe and convenient. The Interurban Trail should have an effective connection to the Town Square and the park in the West End.

CCUD 15. Nature of Interurban Trail. The Interurban Trail should be continuous and uninterrupted by at-grade crossings at major roads, and should include lighting and other amenities to create a safe and comfortable pedestrian environment.

CCUD 16. Linking Public Space in the Core. The Town Square shall be linked to the Interurban Trail through a public trail or corridor.

Public Space

CCPS 1. The demographics of residents in the City Center are expected to differ from that of the City of Lynnwood as a whole. It is, therefore, appropriate to establish a separate Parks and Recreation Level of Service standard for the City Center.

CCPS 2. Future City Center development will bring a number of recreation opportunities such as book stores, coffee shops, wider sidewalks with an attractive walking environment, health clubs, theatres, and plazas or small parks that are provided by private property owners. While these amenities do not replace the need for traditional parks and open space, they can support reducing the amount of these facilities that are provided by the City.
If the City used the current Level of Service standard in the City Center, the Preferred Alternative 2020 population would require 52.5 acres of new parks. The Preferred Alternative shows four parks and one public plaza totaling approximately 9.5 acres. In addition, the central promenade, which connects two of these public spaces, is in itself a significant public space totaling approximately 2.4 acres.

**CPPS 3.** The four parks that are part of the Preferred Alternative, and the central promenade, are necessary to support development of the City Center. These parks and public spaces, or their spatial and functional equivalent, shall be provided as new development occurs in the City Center.

Provision of 41 more acres of parks to meet the City’s current Level of Service standard within the City Center would be difficult to achieve and very expensive. It is clear, however, that at least one additional and significant traditional park, outside but adjacent to the City Center boundary, should be provided.

**CPPS 4.** In addition to the parks shown on the Preferred Alternative, one additional park at least 10 acres in size is needed to support development of the City Center. This new community park should contain sufficient dry, flat land to allow development of active sports fields and open lawn areas. This park should be within walking distance (approximately one-quarter mile) of one of the two housing areas, and be designed to provide for a variety of recreational opportunities.

It is important that these policies apply to the City Center, and within a clear boundary, and that they not be used to justify a lower park standard elsewhere in the City. It is also important to periodically re-evaluate these policies as development occurs.

**CPPS 5.** The park strategy for the City Center is designed to address the unique characteristics of development in that area, and is to be considered a minimum standard. This strategy is not appropriate outside the boundaries of the City Center.

**CPPS 6:** These park policies are based on a prediction that residential development will emphasize studio, one-bedroom units and other similar housing types, and will therefore tend to discourage families with children. If this predicted housing pattern does not occur, the demand for park and recreation facilities will increase, and will require a revision to the park strategy.

**CPPS 7:** The type of housing being developed should be monitored annually, and revisions to the park strategy should be adopted if the expected pattern of development does not occur.
The City’s trail system must also be improved. Key to making this changed Level of Service standard work for the City Center is the ability to safely move through the City, and get to parks adjacent to the City Center, without using a car.

**CCPS 8:** The City should complete its Non-Motorized Transportation Plan and through it develop an interconnected public trail system of sidewalks, bike lanes, walkway connections through properties, and trails on separated rights-of-way. To the extent possible, this trail system should emphasize loop routes rather than dead ends.

**CCPS 9:** Trails in general, and the Interurban Trail specifically, should be improved with waysides, better signage, and improved landscaping.

**CCPS 10:** The single most important trail project in the City Center is construction of the Interurban Trail overpass of 44th Ave. and the section of missing trail from 44th Ave. to 40th Ave. This “Missing Link” makes it impossible to use a significant length of existing right-of-way, and requires trail users to cross one of the City’s busiest streets. This project is critical to the successful use of a different park standard in the City Center. When this overpass is completed, users will be able to travel from Everett to Seattle on the Interurban Trail system.

**CCPS 11: Secure Property for Public Spaces**

In order to prevent the development of land identified for public spaces, the City should secure options that would allow for eventual purchase of property for public spaces in the City Center. This would require a study of parcel size and configuration, ownership, property valuation, and availability. In some cases, there may be buildings on the property which will need to be phased out.

**CCPS 12: Analysis of Concepts, Feasibility and Financing**

The City should prepare a study examining the preliminary designs, costs and financing strategies for the three major public spaces indicated in this Sub-area Plan. This work will be important to determine the form and timing of implementation. It can also provide data and information necessary for grant applications. Such a study should examine the issues and implications of parking on-site versus elsewhere. The study should provide a conceptual level design for each major public space identifying the key components. Financing options should also be examined, including the notion of contributions from private development.

**CCPS 13: Amend the City’s Comprehensive Plan to Recognize City Center Public Spaces**
The Parks, Recreation and Open Space Element of the City’s Comprehensive Plan should be amended to incorporate the three major public spaces. It is important to show the spaces indicated in this Sub-area Plan in the context of other parks facilities for the city as a whole. This will, in turn, suggest other peripheral spaces as well as linkages that may be needed in the overall system of parks and trails.

**CCPS 14: Include City Center Public Spaces in the City’s CIP**

In order to implement the directions in the Sub-area Plan, the City’s Capital Improvements Program should incorporate line items for property acquisition, design, and development of the three identified public spaces.

**CCPS 15: Impact Mitigation Fees**

In accordance with State Law, the City may impose impact fees on new development that can be used to help acquire or develop parks and other public spaces within the City Center.

**Development Strategies**

**CCE 1. Development Manager.** Create the position of City Center Development Manager, as part of the administration of the City. (Position could be an existing one or a new one.)

**CCE 2. Umbrella Group.** The City should support the creation of a City Center umbrella group, such as a Downtown Association including potentially funding the organization in its early years.

**CCE 3. Joint Projects.** Establish agreements with other agencies and the private sector to pursue joint projects that can carry out the objectives of both the City and the agency.

**CCE 4. Marketing Plan.** Prepare a marketing plan for telling the “story” of the City Center and to identify programs, people and organizations that can play different roles in redevelopment.

**CCE 5. State Legislation.** The City should avail itself of any state legislation that can induce development into the City Center, such as the Tax Abatement provisions for multi-family housing.

**CCE 6. Monitor.** Establish a process and timeline for ongoing and annual review of the City Center Plan and its implementation.
CCE 7. Encourage Projects. Foster projects that attract major new investment, quality jobs, retail shops and services, entertainment, public spaces, cultural attractions and governmental functions that meet the objectives of this plan.

CCE 8. Capture Market Potentials. Capture the economic and market potential of Lynnwood's geographic location through the creation of a mixed-use city center that provides for the needs of Lynnwood residents and serves the sub-regional population of south Snohomish County and north King County.


CCE 10. Identify Resources. Identify and direct private and public resources to achieve the vision of the City Center Plan and enhance the city's tax base.

CCE 11. Form Partnerships. Form partnerships with for-profit entities, non-profit entities, and other government agencies to provide investment and improvements in the Lynnwood City Center.

CCE 12. Collaboration. Work in combination with the Chamber of Commerce, property owners, businesses, and other entities as may be appropriate to promote and market the city center to investors and businesses.

CCE 13. Economic Analysis. Prepare as an on-going activity an analysis of the demographic, economic, real estate and fiscal characteristics and trends of the Lynnwood City Center Project and surrounding area.

CCE 14. Priorities for City Investment. The priority areas for the City's investments are: First priority: City Center triangle (that area bounded by 196th Street SW, 44th Avenue W and I-5). Second priority: The properties adjacent to the catalyst projects of the transit center and convention center.

Capital Facilities/Utilities

CCCF 1. New Conveyance and Hydraulic Modeling. Install new sewer conveyance in all new streets and evaluate existing sewers for capacity. Replace existing sewers that cannot meet future capacity requirements. Utilize a hydraulic model based on peak flows and street grades to size conveyance.

CCCF 2. Water Distribution. Install new water mains in all new streets. New pipes should be sized to minimize the length of existing pipe that will have to be replaced in order for the entire network to meet domestic and fire flow requirements.

CCCF 4. Storm Drainage Requirements. Require all new and redeveloped streets and properties to meet current storm drainage requirements set forth by the City.

CCCF 5. New City Street Analysis. Conduct a detailed drainage study in conjunction with the design of the City Center street improvements to identify detention and treatment facilities for new City Streets. Minimize the number of new public detention and treatment facilities, and locate facilities within existing or new street rights-of-way.

CCCF 6. Public Spaces and Storm Water Detention. New stormwater detention and drainage facilities should be designed to include public park and open space amenities wherever possible. These stormwater detention and drainage facilities shall not substitute for the park and open space requirements for new development.

CCCF 7. LID Formation. Consider forming a Local Improvement District as a way of funding utilities, street, and storm drainage improvements.


CCCF 9. Underground Utility Study. Conduct an underground utility study with participation from City and all franchise utility staffs to identify critical phasing.

CCCF 10. Decorative Utility Covers. The City should consider commissioning an artist to create a decorative utility cover to reflect the image of the community. This cover would be required on all utility accesses located within the sidewalk area.

CCCF 11. Expand Service Capacity. Work with utilities and other service providers to plan for and coordinate expansion of service capacity.

Proposed Strategic Projects and Programs

The Draft City Center Plan identifies a number of strategic projects and programs that could be undertaken in the initial, start-up period immediately following plan adoption. These would be intended to further implementation of the sub-area plan and to help create conditions that are conducive to planned redevelopment. These include the following:
Projects

- working with Sound Transit to develop a design build project for housing in the air rights above the new parking lot next to the expanded transit center

- incorporating the following projects into the City’s CIP:
  - widening 196th to add one lane in each direction
  - widening 44th to add one lane northbound
  - adding the signals and intersection improvements recommended in the plan’s Transportation policies
  - acquiring right-of-way for a future secondary grid street network through dedications and purchase
  - improving utilities to serve the City Center

- incorporating acquisition and development of major public spaces into the CIP. High priorities include a town square in the Core and a public square in the West End.

- working with the state and legislative delegation to begin planning and funding of new ramps to I-5

- working with the Edmonds School District to identify options for redevelopment and to market their property on 196th Street SW

- working with private property owners and developers to identify key short term development projects that could work as catalysts in attracting development

Programs

- adopting a new land use code and design guidelines

- adopting amendments to the Uniform Building Code to allow 4-5 floors of wood frame construction on top of a concrete base

- adopting an ordinance to allow the state-authorized ten year tax abatement program for multiple family residential development to be applied within the City Center

- exploring a phased program for consolidating city offices into a government center, along with a local transit center and new library on a site within the City Center

- forming an umbrella organization dedicated to advocacy, collaboration, marketing and financing for the City Center
• create the position of City Center development manager to promote and oversee public and private investment

• creating special mechanisms, such as local improvement districts (LIDs) or business improvement districts (BIDs) to accomplish projects and programs

• reviewing state legislation that may help achieve the City Center plan and implement those provisions

• establishing a City Center parking management program together with a program of residential parking permits for neighborhoods outside the City Center

• developing a marketing program for the City Center

• developing a traffic mitigation program

G. Draft City Center Development Regulations & Design Guidelines

The Draft development regulations and design guidelines are intended to implement the objectives, policies and principles contained in the sub-area plan. They are part of an implementation package that will be considered by the City Council concurrent with the sub-area plan.

City Center Land Use Regulations

The proposed action includes adoption of City Center land use districts and regulations (amending Chapter 21.60 of the Lynnwood Municipal Code). Key feature (based on the April 8, 2004 discussion draft) are summarized below.

Zoning Districts

Three new zoning districts would be created:

• City Center Core (CC-C) – which would have the highest intensity uses, especially office buildings, residences and hotels contained within mixed-use, high-rise buildings;

• City Center West (CC-W) – containing a mix of higher density housing, retail and restaurants, and some office buildings within mid-rise buildings; and

• City Center North (CC-N) – with a mixture of primarily mid-rise office buildings and retail
**Permitted Uses**

All appropriate land uses would be permitted within the City Center’s districts. Uses prohibited in the City Center as a whole, because considered incompatible with desired character, include such uses as industrial activities, adult establishments, outdoor storage of material or equipment, vehicle repair, wrecking yards, sewage treatment plants, billboards and similar uses. In addition specified uses would be prohibited within the City Center Core district, including vehicle washing, free-standing drive-through businesses, gas stations, street-level mini storage, and outdoor sales of vehicles, boats and equipment.

**Dimensional Standards**

Building size would be controlled by standards for floor area ratios (FAR) and height. FAR is a ratio of the floor area of the building to the area of the lot. A basic FAR would be allocated to each parcel of land and type of use automatically (i.e., “as of right”) -- 0.5 for residential uses and 1.0 for non-residential. A bonus provision would permit increases in FAR in exchange for providing certain desirable site or building features; examples include day care facilities, public art, public plazas, canopies structured or below-ground parking, and green roofs. Maximum FAR with bonuses for non-residential and residential uses, respectively, would be 8.0 and 10.0 in the CC-C district; and 3.0 and 5.0 in other City Center districts. Residential and non-residential bonuses could be combined for mixed-use buildings.

Building height would use a similar bonus system. Buildings would be allowed a certain height automatically (350 feet in the Core district, and 140 feet in the West and North districts), and these heights could be increased for contributions of funding for parks or cultural facilities (10 additional square feet for each $100 contributed, up to a maximum increase of 25 percent for parks contributions and 25 percent for cultural facilities). An additional 20 percent height bonus is available incorporation of architectural roof-top elements.

**Parking & Street Standards**

The code proposes minimum and maximum parking standards for various types of uses. Maximum standards are intended to reduce the amount of space devoted to parking and to encourage transit and pedestrian travel.

The code defines different types of streets – boulevards, pedestrian streets and other streets – each with varying functions, characteristics and design standards. Standards are consistent with the generalized street sections shown on Figure 1.
Draft City Center Design Guidelines (7/28/03 draft)

Standards specific to the City Center would be established for site design, building design and signs. Almost all proposals in the City Center would be reviewed to ensure that development and redevelopment is consistent with the urban design principles of the City Center Sub-Area Plan, described above. The standards include examples and illustrations of ways in which the intent of the standards can be achieved.

The standards address the following design topics:

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<th>Site Design</th>
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<th>Signs</th>
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<td>Parking Lot Location</td>
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<td>Interior Parking Lot Landscaping</td>
<td>Street Level Uses &amp; Transparency</td>
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<td>Screening Rooftop Mechanical &amp; Communications Equipment</td>
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<td>Gateway Locations</td>
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H. City Center Implementation Program

Implementation of the City Center Sub-Area Plan will occur over an extended period of time and will employ a variety of mechanisms and programs, including development regulations and financing programs. Existing and new regulatory programs, for example, will require provision of certain development-related improvements in connection with project approval. Proposed City Center zoning regulations also include incentives (e.g., a height bonus) for contributions towards public amenities, like parks and cultural facilities. The City is also evaluating application of a transportation concurrency program which would ensure that development is phased with improvements to the road system.

As the draft City Center Plan has been developed and reviewed, the City has also been evaluating approaches to financing the improvements – including grid streets and arterials, the promenade, plazas and parks, and utilities – needed to implement the City Center vision. While numbers are not firm, the outline of the City’s approach is clear.
The City will continue to refine its approach as the draft City Center plan is reviewed and discussed. The necessary package of improvements, an overall funding program and formula(s) for determining the share of future City Center development, will be included in an implementation plan and appropriate development regulations. Or, if the City determines to designate the City Center as a planned action, such mitigation requirements would be included in a planned action ordinance.

Improvements for grid streets, arterial streets and intersections, the promenade, plazas and parks, and utilities (sewer, water, drainage) are currently estimated to cost approximately $114 million; cost estimates will be refined along with other elements of the implementation program. In general, financing will be the shared responsibility of individual developers and property owners, and the City as a whole. The developer share is assumed to be generated through creation of one or more local improvement districts (LID). No protest agreements would be executed in conjunction with development approval to ensure participation in proposed LIDs. Developers would also be required to construct road improvements to mitigate for project-related transportation impacts. The City’s share would be funded by a combination of state and federal grants and funds generated from tax revenues, including significant tax revenues attributable to new development in the City Center. Regional funding, from a proposed Regional Transportation Improvement District (RTID), is also possible.
II. COMMENTS & RESPONSES

This section of the Final SEIS responds to comments received on the Draft SEIS for the City Center Sub-Area Plan. All comment letters were submitted by governmental agencies (including individuals appointed to agency review groups). No comments were received from groups or individual citizens commenting in their individual capacity.

Each comment letter and comment is numbered consecutively. Each comment letter is reproduced, followed by the responses. Where more than one comment raises the same substantive issue, a complete response is provided for the first occurrence of the issue; subsequent commentors are directed to that response.

Consistent with WAC 197-11-560, responses are provided for substantive comments relating to the accuracy of data and conclusions of the Draft SEIS analysis. Statements of preference and subjective opinion regarding the proposal or analysis are acknowledged; although not required, a response is provided wherever possible.

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<td>4.</td>
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<td>City of Lynnwood Environmental Review Committee (ERC):</td>
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<td>Laurie Cowan, Parks &amp; Recreation Department</td>
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<td>6b.</td>
<td>John Anderson, ERC Citizens Representative</td>
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<td>6c.</td>
<td>Arnold Kay, Public Works Department</td>
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<tr>
<td>6d.</td>
<td>Darryl Eastin, Community Development Department</td>
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</table>
Letter No. 1 Washington State Department of Transportation

1. Thank you for your statement of concurrence with proposed transportation improvements in the City Center.

2. Thank you for your expression of support for Alternative B, which is the preferred alternative recommended by the City Center Oversight Committee.

3. The City will consider a broad range of transportation mitigation measures, which will include an Interlocal agreement with WSDOT to address impacts to state highways.

4. Concurrency is required to comply with the requirements of the Growth Management Act (RCW 36.70A.070 (6)). The City is committed to complying with the GMA and will propose a concurrency management program in conjunction with implementing the City Center plan.

5. As noted in your comments, improvements to 196th Street/SR-524 are part of the package of improvements recommended for the Oversight Committee Preferred Alternative.
Letter No. 2 Community Transit

1. Your corrected reference in the draft City Center Sub-Area Plan is noted.

2. Your suggested addition to the draft City Center Sub-Area Plan is noted.

3. Your suggested addition to the draft City Center Sub-Area Plan is noted.

4. Thank you for providing updated information regarding transit route and park-and-ride information; it is hereby incorporated into the Final SEIS.

5. Many elements of the City Center Sub-Area plan are intended to support and increase transit use and pedestrian travel, including achievement of higher densities, a mix of land uses, enhanced pedestrian circulation, and parking management. The City acknowledges the enhanced transit service and facilities provided by Community Transit and Sound Transit and appreciates the expression of support for the City Center Plan.
Letter No. 3 Snohomish County Public Utility District No. 1

1. The modified language regarding coordination for all electric system infrastructure, is acknowledged. The City recognizes that such coordination with the PUD is necessary to implement planned improvements in the City Center.

2. The City acknowledges, and the Draft SEIS discloses, that significant electric system additions and improvements will be required over time to implement the City Center Plan.

3. The City acknowledges, and the Draft SEIS discloses, that phasing of improvements to the existing electric system will be required.
Letter No. 4 Snohomish County Public Works/Candace Soine.

1. The transportation analysis in the Draft SEIS focuses on traffic conditions within and adjacent to the City Center. This focus is reasonable given the nature of the sub-area plan and the existing congestion issues in this sub-area. Intersection level of service analysis, therefore, focused on the City Center.

The analysis did, however, consider potential impacts to the regional arterial system. As shown on Figure 3-18 in the Draft SEIS (page III-116), the road network that was analyzed includes several regional arterials outside the City limits; these streets include Highway 99, SR 525, 164 Street SW, 44th Ave. W and 128th Street SW, and several streets located east of I-5, including Poplar Way, 204th Street SW, Larch Way and Cypress Way. Within this network, the analysis identified those streets which would experience increases and decreases in traffic in 2020 relative to No Action (i.e., the City’s existing Comprehensive Plan). The red lines on Figure 3-18 indicate decreases in traffic relative to No Action; the width of the red lines indicate the relative magnitude of the decreases. As reflected on the graphic, numerous road segments and streets outside the City would experience relative decreases in traffic. Please also refer to the transportation analysis in the EIS for the City’s Comprehensive Plan for more information regarding the “No Action” alternative.

In general, the traffic analysis indicates that the City Center Sub-Area plan, which includes higher density mixed-use development, would result in significant increases in transit use. The analysis also generally indicates that impacts on the regional system would be reduced relative to No Action.

2. Please refer to Section II of the Final SEIS, which describes the proposed approach to financing improvements. In general, implementation of the City Center Sub-Area Plan will employ a variety of mechanisms and programs, including development regulations, financing programs and formation of local improvement districts (LIDs). Existing and new regulatory programs, for example, will require provision of certain development-related improvements in connection with project approval. Proposed City Center zoning regulations also include incentives (e.g., a height bonus) for contributions towards public amenities, such as parks and cultural facilities. The City is also developing application of a transportation concurrency program which would ensure that development is phased with improvements to the road system.

The necessary package of improvements, an overall funding program and formula(s) for determining the share of future City Center development, will be included in an implementation plan and appropriate development regulations. Or, if the City determines to designate the City Center as a planned action, such mitigation requirements would be included in a planned action ordinance. The program will fairly allocate funding and mitigation responsibilities between new project developers and the City as a whole.

3. Thank you for your comment. The Population, Housing and Employment section of the Draft SEIS (Section III.D) identifies potential population and employment growth
associated with the City Center Sub-Area Plan for 2012 and 2020. The Draft SEIS also
discusses the relationship of this growth to the population targets in the City’s adopted
Comprehensive Plan. According to 2000 Census data, Lynnwood had exceeded its 2012
population projection. Because designated Urban Centers, such as Lynnwood’s City
Center, are intended to accommodate increasing amounts of population and employment
growth at higher densities, this growth was not necessarily considered to be an adverse
impact.

The Draft SEIS discussion of growth targets, in the Plans, Policies and Regulations
section (Section III.C), notes that population growth in the City Center would be within
the city-wide population allocation for 2012, but greater than the allocation for the
designated Subregional Center. Potential employment growth to 2012 would be within
the city-wide and Subregional Center allocations. The discussion notes that the City
would reconcile the population associated with the City Center scenario which is
ultimately adopted with updated 2020 GMA forecasts.
Letter No. 5  City of Lynnwood Planning Commission/Dave Johnson

1. The reference to Figure 1 is incorrect. As noted in the Draft SEIS, Section II incorporates information contained in the 2002 City Center Existing Conditions Report. The reference is to Figure 1 contained in the Environment chapter of that document. The text of the Draft SEIS is modified accordingly.

2. The two statements are not believed to be inconsistent. The text on page II-3 refers to reports of “occasional sightings” reported by WDFW. The source for this statement is anecdotal information from a personal communication with WDFW. It is not clear how “occasional” the sightings were or how frequently they occurred. The statement on page III-8 regarding a blockage to fish passage to Scriber Creek is based on a stream habitat characterization report prepared for the City (Jones & Stokes, 2000). Blockages are documented on maps contained in that report. Occasional sightings – which are assumed to involve few fish and to occur infrequently – are not considered to be inconsistent with the existence of a blockage.

3. Thank you for noting the typographical error on page III-8.

4. Your comment regarding the narrative on pages III-15 through III-22 is acknowledged. It should be noted that the Draft SEIS is within the 150-page limit for EIS's contained within the SEPA rules.

5. Your suggested change in wording is hereby incorporated into the Final SEIS. Your comment regarding the traffic analysis is correct – eight City Center intersections would decrease in LOS, one would improve and seven would remain the same. It should also be noted that only one intersection would operate at LOS E; all others would operate at LOS D or better.
Letter No. 6  City of Lynnwood Environmental Review Committee (ERC)

6a. Laurie Cowan, Parks & Recreation Department

1. Thank you for your suggested change to the wording of mitigation measure for land use, aesthetics and urban design.

2. Thank you for your suggested changes to City Center Plan Policies and Design Principles. They have been transmitted to the City staff and consultants developing the plan. Changes to the policies themselves are beyond the scope of the SEIS.

3. Thank you for your suggested update to the list of historic sites in the Existing Conditions section of the Draft SEIS. His information is hereby incorporated into the text of the EIS.

4. As noted in the Draft SEIS Public Services discussion (Section III.F.4), the adopted city-wide level of service for parks and open space is based on residential population; it does not address the demand created by non-resident employees of non-resident users. A level of service specifically attributable to City Center employees is not proposed at this time. The Draft SEIS notes that demand for parks by employees is typically not considered significant. Any level of service would need to be based on user data and supportable calculations of demand; such information is not currently available. A level of service for parks and open space specific to the City Center is being discussed by Planning staff, however.

5. Thank you for the information regarding trails. Please see the previous response.

6b John Anderson, ERC Citizens Representative

6. Your comments regarding bus pullouts are acknowledged. In general, the City Center street system has not been engineered or designed in detail at this time. Conceptual cross sections for various City Center street classifications are contained in Figure 1-2 of the Draft SEIS. As described in the Draft SEIS, conceptual street design is intended to be pedestrian-oriented while functioning to move traffic efficiently. Bus pullouts would be addressed when streets are designed in detail.

7. Your comment is acknowledged; direction arrows were omitted from the graphic.

8. The referenced statement on page I-19 describes the SEIS “No Action” alternative. This scenario would involve a continuation of existing plans and zoning for the City Center area; the City would not adopt a coordinated sub-area plan, development regulations and/or design guidelines. Without an overall plan for the area, and without changes to existing development regulations, existing zoning would be the major control on the type of uses locating adjacent to the Convention Center. As noted in Section II of the Draft SEIS, existing land use and zoning designations in the City Center are predominantly Regional Commercial and Office Commercial, both of which permit a
wide range of commercial land uses. There are currently no height limits in the City Center. As a result, there would be no predictability as to what uses would locate adjacent to the Convention Center, or to the size of buildings. Such uses might not be "associated" with the Convention Center, and might not be supportive of its activities.

9. Figure 1-2 uses 198th Street as an example of a "promenade street." Your suggested modification of the text on pages 1-20 and 1-21 is incorporated into the Final SEIS.

The white space at 48th Avenue and 200th Street of the City Center alternative graphics (Figures 1.3, 1.4 and 1.5) is outside the City Center sub-area and is not included within the draft plan.

10. Thank you for the updated information on historic buildings and parks; this information is hereby incorporated into the SEIS.

11. You are correct that existing zoning in the City Center does not include height limits. The Draft SEIS assumes that office buildings in the City Center for the Oversight Committee Preferred Alternative and Alternative C could be as tall as 25 stories (see Table 1-2). The draft City Center Development Regulations (April 2004) indicate a basic allowable height of 350 feet in the CC-C zone; a 25 percent height bonus (88 feet) is possible for contributions to parks or cultural facilities.

Paine Field is located approximately 3 miles northwest of the City of Lynnwood. Snohomish County adopted an updated master plan for Paine Field in 2002, and the plan was approved by the Federal Aviation Administration (FAA) in 2003. Local airspace surrounding Paine Field is designated as Class D, which consists of the airspace within a five mile radius from the geographic center of the airport, and extends from the surface up to an altitude of 2,500 feet above ground level. However, Paine Field is also within the airspace of the Seattle-Tacoma International Airport, which extends in concentric rings for thirty miles from Sea-Tac. (Refer to Figure A-9 in the Paine Field Master Plan.) All aircraft within this airspace are subject to federally-mandated operating rules.

FAA regulations (Federal Aviation Regulations, Part 77) are intended to protect airport airspace and approaches from hazards, including objects in the vicinity of the airport. Construction of any object (e.g., buildings, communication towers) more than 200 feet above ground level would be required to provide notice to the FAA. The FAA would then conduct a study to determine whether the proposed building or structure presents a hazard to navigation. Mitigation measures would be developed as part of that study.

The Airport Master Plan also establishes runway protection zones (RPZ), measured from the ends of runways. The City Center is not within an RPZ.

12. Thank you for your comment regarding improvements to water quality through enhanced drainage standards.
13. It is envisioned that zoning regulations and design guidelines for the City Center would require landscaping. Please refer to the draft City Center Development Regulations April 2004; these base landscaping requirements on the type of street a building fronts on, not building height.

6c. Arnold Kay, Public Works Department

14. Please refer to the response to Letter No. 5 Comment 2.

15. Please refer to the response to Letter No. 5 Comment 2.

16. Thank you for the correction.

17. Your correction is noted - the signal at 40th Ave and 188th Street has already been installed.

6d. Darryl Eastin, Community Development Department

18. The City’s approach to using phased environmental review to address air quality impacts is discussed in the Draft SEIS (Pages III-3 through 4). It is anticipated that air quality conformity analysis would be conducted when the road network and specific improvements has been designed to a greater level of detail. This would not occur until after the sub-area plan is adopted, because the City Center scenario selected by the City Council will determine the extent of traffic improvements that will need to be modeled. The conceptual level of information available at this time would not provide the level of detail required for air quality modeling. In addition, the number of alternatives considered in the SEIS would be very expensive to model. Modeling could occur before or after a planned action ordinance were adopted.

19. Thank you for your comment. The City Center Sub-Area Plan would not increase impervious surface relative to existing conditions. As noted in the Draft SEIS discussion of water quality (page III-7), it is assumed that the City will adopt and implement updated water quality standards consistent with the requirements of state law. Implementation of more stringent stormwater management standards would result in increased detention and enhanced water quality treatment; these changes would positively impact water quality relative to existing conditions. Since the City Center plan itself would not adversely affect water quality, no mitigation measures were required. Implementation of stormwater BMPs and updated standards should occur with any alternative.

20. Your comment accurately characterizes SEPA’s requirements that mitigation measures must be reasonable and capable of being accomplished (WAC 197-11-660). Mitigation must also be based on adopted policies that are specifically identified as a basis for SEPA mitigation. The implementation program for City Center improvements will have to satisfy these criteria if it is to be used as a basis for SEPA mitigation.
However, apart from SEPA, such a program could also be adopted as a development regulation and applied to an individual project as a condition of approval.

SEPA’s planned action provisions do not modify the basic principles stated above regarding mitigation. (Similarly, they do not modify any principles applicable to the scope, level of detail or adequacy of an EIS.) Pursuant to WAC 197-11-168, a planned action ordinance should identify any specific mitigation measures other than applicable development regulations that must be applied to a project for it to qualify as a planned action. Thus SEPA-based and/or adopted development regulations may be used to mitigate individual projects.

21. Please refer to implementation discussion in Section I (pages I-44 and I-45) of the Final SEIS and in the response to Letter No. 4 Comment No.2. The City is refining its estimates of the costs of needed road and utility improvements. Its funding program is intended to fairly allocate financing and mitigation responsibilities between project developers and the City as a whole.

22. Thank you for the updated information regarding historic buildings in Lynnwood. The draft City Center Sub-Area Plan does not currently address reconstruction of historic structures.

23. The Draft SEIS discussion of aesthetics and building heights was based on the maximum height buildings described in the alternatives at that time. Draft City Center Development Regulations were proposed for discussion subsequent to publication of the Draft SEIS. These regulations would increase building heights allowed outright in the sub-area to 350 feet in the City Center Core district (approximately 32 stories, assuming 11 feet per floor), and 140 feet (approximately 13 stories) in the City Center-West and City Center-North districts. The regulations also include bonus provisions for financial contributions to parks (maximum 25 percent height bonus) or cultural facilities (maximum 25 percent height increase), and for architectural roof top features (maximum 20 percent bonus). Cumulatively, if all available bonuses were obtained, a project in the City Center core could reach a height of 595 feet (54 stories, assuming 11 feet per story).

Although theoretically possible, this scale building is considered to be unlikely in the City Center given current market demand and land costs. It is worth noting that the same bonuses are included in the City of Bellevue Land Use Code; despite intensive development over the past twenty years, no developer has used all available height bonuses and buildings have not approached the maximum.

In response to your comment, however, the following additional analysis is being provided in the Final SEIS to address potential impacts associated with these height increases. The Draft SEIS accurately identified the range of potential impacts associated with taller buildings in the City Center, including contrasts in scale, view blockage, view creation, and shading. These same impacts would occur if buildings heights were increased as permitted in the draft development regulations, although impacts could be greater in magnitude and more significant. The overall change to the appearance and
character of the City Center would be more substantial — it would be more urban in character and more intensively developed. In general, from an aesthetic perspective, these changes are still considered to primarily positive in direction. Some viewers may, however, consider this type of change — from low density, suburban, strip-type development to urban high rise — to be adverse. Contrasts in scale between adjacent buildings could be more dramatic. Existing land uses adjacent to the tallest buildings — for example, residential uses located north of the City Center Core — could experience a reduction in their sense of privacy from the proximity of intense development and very tall buildings erupting from the City Center. While this would not be an “environmental” impact per se, and not a subject for SEPA analysis, it is recognized as a potential impact to these residents.

The draft code also contains significant limitations on building height (to 50 feet) for any portion of a building within 150 feet of a single family district. This would serve to mitigate potential impacts to existing single family residences adjacent to the City Center sub-area. Further reductions in building height could be considered in conjunction with the shadow analysis provided below. Mitigation for shadow impacts could be in the form of evaluating and establishing maximum height limits for buildings within a certain distance of nearby residential areas.

It should also be noted that the total amount of development — in terms of numbers of residential units and square feet of office or retail space — assumed for the City Center over the next 20 years (see Table I-2) would not be affected by the potential increased height of buildings; the same amount of development is assumed to occur regardless of the exact configuration of buildings.

Additional analysis of potential shading impacts (using computer modeling) was also conducted. It was focused on potential shadow impacts to planned public open spaces, the pedestrian environment, and existing residential neighborhoods from large buildings in various locations in the City Center. Buildings were modeled to the maximum height permitted by the draft City Center development regulations for each zoning classification; this modeling assumes use of all available height and floor area ratio (FAR) bonuses. To simulate maximum, worst case impacts, these hypothetical buildings were assumed to be located near all public open spaces. It should be noted that the shadow impacts on the residential area north of the City Center are overstated. The model does not take into account land elevation differences. As the City Center is lower than the residential area, the shadows would not extend as far north as shown in the illustrations. Also, the actual number of maximum height buildings is unlikely to be as many as shown. The model was observed with specific altitude, azimuth and declination of the sun for the location throughout the year. The modeled buildings are shown in Figures II-1 through II-7.

Using these worst case assumptions, some pedestrian areas and public open spaces would be in shadow for some portion of the day. At the summer solstice (Figures II-1 through II-3), approximately one-half of the planned public open space would be impacted by shadow for up to three hours. This shadowing would generally occur between the hours
of 8-10AM, and between 5-6PM. Shadows would be localized and would not affect all of the public spaces at any one time.

At the equinox (Figures II-4 through II-6), all of the public spaces would be impacted by shadows for 3-5 hours each day. Shadows would be localized and would not affect all of the public spaces at any one time.

Maximum shadow impacts would occur during the winter solstice (Figure II-7), when there is daylight for less than seven hours per day. During this 7 hour period, more than one-half of the public open space would be in shadow for 4-5 hours.

Some shadow impacts could also occur to residentially zoned land located to the north of the City Center, assuming development of maximum height buildings in the City Center Core. Impacts would occur from early September to early April, generally between the hours of 10AM and 4PM on days when the sun is shining. (Figures II-6 and II-7.) The most significant shadowing, using worst case assumptions, would occur at noon during the winter, when shadows cast by maximum height buildings could extend north approximately to 188th Street SW. This would most directly affect existing residential land uses located to the north of the City Center Core.

The Draft SEIS (e.g., page III-57) identifies the potential for view blockage from some locations as a result of taller buildings in the City Center Core. Heights permitted by the draft development regulations could increase the potential for blockage of views to the east, particularly for existing land uses located north of the Core. The extent of impacts would depend on the height, mass, location, and number of new buildings developed in the Core.
Figure II-1, Shadow Study, Summer Solstice (9 a.m.)
Figure II-1, Shadow Study, Summer Solstice (Noon)
Figure II-3, Shadow Study, Summer Solstice (5 p.m.)
Figure II-4, Shadow Study, Equinox (9 a.m.)
Figure II-5, Shadow Study, Equinox (Noon)
Figure II-6, Shadow Study, Equinox (5 p.m.)
Figure II-7, Shadow Study, Winter Solstice (Noon)
May 20, 2004

Dennis Lewis
Lynnwood Environmental Review Committee
P.O. Box 5008
Lynnwood, WA 98046

Subject: SR 5/ SR 524
City of Lynnwood
Draft Supplemental
Environmental Impact Statement Review

Dear Mr. Lewis,

The subject EIS examines the possibility of adding 3.4 to 9.9 million square feet of new development (office, retail, and residential), including up to 4,000 new dwelling units by 2020.

We have read the subject document and offer the following comments for your consideration.

1.) We concur with and support the EIS goals as stated in the Transportation Policies section, including:

- minimizing driveways along SR-524 (196th St.) and spur (44th Ave.)
- maintaining LOS B for SR-524 and spur (superceding the comprehensive plan for the rest of the city)
- widening 196th to 7 lanes from 48th Ave. to 37th Ave.
- widening NB 44th Ave. to add a through lane from I-5 to 194th St.
- coordinating signals
- adding a 2nd LT lane from NB 44th to 196th
- adding a 2nd WBLT lane to the 44th Ave./200 St. intersection
- providing medians
- striving for a continuous and uninterrupted Interurban Trail, including access to the City Center.

2.) In terms of traffic impacts, we support the selection of Alternative B as the preferred alternative. Under this alternative, congestion is expected to be no worse or less than current congestion levels after implementation of the planned improvements and transportation policies above. We note that this includes an expected lessening of congestion at the junction of the SR-524/SR-524 spur (44th Ave/196th St. intersection after planned improvements).

3.) We recommend supporting Alternative B provided that:

II-21
- the City signs an interlocal agreement with the WSDOT to mitigate development's impacts to state highways (especially new developments resulting from this EIS),

- and that Alternative B is accompanied by a commitment to transportation concurrency (funding improvements so that traffic impacts are mitigated in a timely manner). This concurrency should include (1) the improvements listed in the report, and (2) the completion of the C-D stages of the I-5: 196th – 44th interchange improvement project (the ultimate design as approved during the design phase as opposed to the weave design which presently exists). Note that p. III-92 shows a relatively high mainline accident incidence for the I-5 mainline adjacent to the Lynnwood City Center.

Alternative B is formally described as having highway improvements which are estimated to prevent an otherwise LOS F condition at the junction of SR-524 and the SR-524 spur, and a near LOS F condition at the SR-524 spur/200th St. intersection. We note that these state route intersections presently have accidents rates greater than 1 accident per million entering vehicles, indicating that any addition development should include improvements at the 2 intersections (as is planned under Alternative B).

4.) We thank the City of Lynnwood and their associated consultants for a through and well-organized draft supplemental EIS.

Thank you for the opportunity to review and comment on this application. Should you have any questions, please feel free to contact Mr. George Chambers (206) 440-4912 of my Developer Services section.

Sincerely,

Ramir Pazooki
Sno/King Area Planning & Operations Manager

RP/gwc

File: SR5-SR524,EIS Review2,Lynnwood,Lewis
May 27, 2004
Re: City Center Sub-Area Plan and Draft SEIS

Dear Mr. Garrett:

Community Transit appreciates the opportunity to provide comment to proposed developments throughout Snohomish County. It is our policy to help ensure that developments, through the established permit process, are designed to be compatible with public transportation.

Community Transit strongly agrees with the over-arching objective of the Lynnwood City Center plan to restructure the CBD to become more mixed use, concentrated, pedestrian-friendly, and transit-supportive. Community Transit provides a high level of transit service inside the city with 3,398 average daily revenue miles serving 221 bus stop facilities; both of these figures represent the most for any city in Community Transit’s service area. Development of the city center area will provide an opportunity to serve a compact, densely populated commercial core; precisely suited to make best use of the significant transit service currently available.

Comments on the Sub-Area Plan and DEIS

- Page 7, Paragraph 4; Eliminate reference to King County Metro

- Page 11, Paragraph 1, Planning & Urban Design Principles #7 – Transit Throughout. Community Transit encourages coordination to “accommodate buses in ways that are safe, convenient, comfortable, and attractive.” This can be achieved by designing turning radius’ with buses in mind; minimizing bumps in the roadway such as raised pedestrian crossings and speed bumps; constructing corner bulbs in close coordination with Community Transit to make sure buses can safely make turns; ensuring travel lane widths are conducive to bus safety margins; minimizing parking lane widths; and coordinating with Community Transit on all bus stops, lane markings and signage issues.

- Page 66, Paragraph 4, CCUD11: Transit Shelters and Design Features. In addition to encouraging enhanced transit shelter designs with added artwork, consideration should be noted to provide for adequately sized bus zones as well as appropriate bus zone markings.

- In the Draft EIS Document, Page III-96, Figure 3-10, Bus Routes in the City Center Area (2003). Please refer to the attached Transit Map of Lynnwood dated February 2004 for current route and park and ride information.
Lynnwood Transit Service

Over the last year and a half transit service in the City of Lynnwood has been improved dramatically. In February 2003, local service headways were decreased from 30 minutes to 20 minutes during weekdays and trip frequencies on Saturdays were doubled. In addition, span of service hours were extended to include trips later in the P.M. And in September 2003, with the opening of the expanded Lynnwood Transit Center, many more travel options became available to city residents. There are more than 700 bus trips per weekday passing through the Lynnwood Transit Center, serving more than 10,000 passengers daily. Approximately 300 parking spaces were added and Sound Transit’s HOV direct access ramp project, when completed, will allow buses and HOVs to go between the facility and the I-5 HOV lanes without using surface streets or regular freeway on-ramps. That change will reduce the length of some trips by as much as 15 minutes. In short, Community Transit is now offering our customers earlier and later service, buses that come more frequently, and new direct service to many popular destinations.

Community Transit strongly supports the high and mid-level development scenarios for the Lynnwood City Center project. To best serve the center, a number of development issues should be addressed during the design phase. For example, early identification of bus corridors in the planning area including placement of bus stop zones will produce the most effective facility grid for transit service. More specifically, accommodation needs to be made for bus stops on Promenade Street, most other boulevards and important collector streets.

Community Transit considers development of the Lynnwood City Center as an important step to providing more transit service to a greater number of Snohomish County residents; helping us to reach our goal of increasing transit service from 2002 levels by 100% over the next 20 years. And at the same time, assisting cities in developing their commercial activities within compact, efficiently served urban core areas.

If I can provide further clarification on these issues, please call or email me. Thank you for including Community Transit in your review process.

Sincerely,

Brent L. Russell
System Planner - Development Review
(425) 348-7189, brent.russell@communtrans.org

Attachments: Community Transit Route Map of Lynnwood
Cc: Tim Brakke, Manager of Service and Facilities Development, Community Transit
Dennis Lewis  
Lynnwood Environmental Review Committee  
P. O. Box 5008  
Lynnwood, WA 98046  

Dear Mr. Lewis:

Reference Number: DSEIS for the Lynnwood City Center Sub-Area Plan and Revised Draft for City of Lynnwood City Center Sub-Area Plan

District DR Number: 04-230

After reviewing the “Draft Supplemental Environmental Impact Statement for the Lynnwood City Center Sub-Area Plan”, the District would like to request the following changes to the document:

Page S-22, 6th paragraph (“Electricity”):
- The City should work with the Snohomish County PUD to determine the extent, location and timing of all electric system infrastructure additions and improvements and undergrounding of lines necessary to support growth within the City Center.

Page III-79, first paragraph (continued from previous page), last sentence:
- The Snohomish County Public Utility District No. 1 (PUD) would meet this additional demand, but only through significant electric system infrastructure additions and improvements.

Page III-79, second paragraph, last sentence
- The preferred option for accommodating this growth, based on discussions with the PUD, contains various phases. Examples of possible phasing of electric system infrastructure improvements are as follows:

If you have any questions regarding these comments, please contact Chris Johnson at 425-783-4346.

Sincerely,

Mary Bond

Distribution Engineering Services
-----Original Message-----
From: Soine, Candice [mailto:Candice.Soine@co.snohomish.wa.us]
Sent: Friday, May 28, 2004 11:10 AM
To: Kevin Garrett
Cc: Fogard, Bobann; Irelan, Eric; Stigall, Anthony; Soine, Candice; White, Scott
Subject: RE: Revised Draft - City Center Sub-Area Plan

Kevin Garrett, Planning Manager
Community Development Department
City of Lynnwood

RE: Revised Draft - City Center Sub-Area Plan

Thank you for the opportunity to review the Draft Supplemental Environmental Impact Statement for the Lynnwood City Center Sub-Area Plan. Snohomish County supports efforts by the City to create a vibrant, pedestrian-oriented downtown area in this location. We are pleased to see the City's progress on developing the City Center sub-area plan. However, please continue to work towards addressing the transportation concerns forwarded by the County last year (during our review of the early draft SEIS).

We encourage the City to continue their planning and design efforts for the City Center, taking into consideration these transportation concerns:

1. (1) Traffic impact analysis for the SEIS should be expanded to a larger area to help ascertain traffic impacts and possible mitigation to the regional arterial system that provides access to the sub-area. Once this information is produced, it needs to be shared with the responsible agencies to help facilitate coordination and development of road and transit system improvements. In particular, we are concerned about traffic impacts to County arterials and state highways east of I-5.

2. (2) The SEIS does not address costs or funding of the identified necessary transportation improvements for road or transit. Without a feasible multi-agency funding program to implement identified system and service improvements, City Center redevelopment may face difficulties moving forward. We would like to encourage the City to explore non-traditional funding sources as a way to supplement and provide additional financial leverage to the project.
3. (3) Selection of either Alternatives B or C would necessitate a re-examination of the preliminary 2025 population and employment forecasts provided by the City to Snohomish County Tomorrow (SCT). Under both Alternatives B and C, population and employment totals in the sub-area would exceed the current citywide forecasts.

The SCT forecasts provide the basis for GMA planning countywide, and are especially important to transportation planning efforts of adjoining jurisdictions. As such, we encourage the City to reconcile your GMA forecasts as soon as possible if either of these alternatives or an equivalent is selected.

_Candice Soine_, Permit Tech

Snohomish County Public Works

Transportation & Environmental Services

Public Involvement/Environmental Group

2930 Wetmore, 4th Floor

Everett, WA 98201

(425) 388-3488 ext. 4259

Reviewed and approved by Scott White, Senior Environmental Planner
June 1, 2004

Mr. Dennis Lewis
Senior Planner
Lynnwood Community Development Department
P.O. Box 5008
Lynnwood, WA 98046-5008

Dear Mr. Lewis:

The Lynnwood Planning Commission has reviewed the Draft Supplemental Environmental Impact Statement for the Lynnwood City Center Sub-area Plan issued April 19, 2004 and has the following comments to offer.

- Page II-2. In the second paragraph on this page reference is made to Figure 1. There is no such Figure in the document. If the reference is to Figure 1-I then Scriber Creek and the other streams mentioned in this paragraph should be shown on the map.

- Page II-3. The last sentence on the page makes a statement that adult Coho salmon have been observed in the upper reaches of Scriber Creek. This statement is not consistent with information contained in III-8 which states that there is a barrier to fish passage on Scriber Creek in the vicinity of Interstate 5. This is an inconsistency that needs to be resolved.

- Page III-8. In the fourth paragraph, Lynnwood is spelled incorrectly.

- Pages III-15 through III-22. Some of the text is repetitive. The suggestion is that when paragraphs repeat previously stated text that instead of doing so the statement “same description as previously given” should be used to cut down on volume of text.

- Pages III-113 and III-114. Issue is taken with the conclusion made in the first sentence on page III-113 that traffic in 2020 would be slightly better than existing levels. Table 3-26 on page III-113 does show that 2020 delay should be less than in 2001 at only three intersections. The recommendation is that the wording of the conclusion be changed to “the overall levels of traffic congestion at intersections would not be significantly worse and in some cases would be better...”
Thank you for the opportunity to review this impact statement. We hope that our comments will assist the project team in improving the document.

Sincerely,

Dave Johnson, Chairman
Lynnwood Planning Commission
Memorandum

DATE: June 4, 2004
TO: Senior Planner Lewis
FROM: Senior Planner Eastin
RE: Draft Supplemental Environmental Impact Statement (DSEIS) for the Lynnwood City Center Sub-Area Plan

The following are comments on the DSEIS for the City Center Sub-Area Plan by individual members of the City of Lynnwood Environmental Review Committee (ERC). These comments should not be read as the official comments by the ERC as the designated SEPA Responsible official for the City:

Laurie Cowan
The following are comments by Laurie Cowan, Parks Planner (1):

I.C Mitigation Measures

- S-18. Land Use:
  - Include "wide landscape buffers adjacent to residential areas with "pedestrian connections."
- S-18. Aesthetics and Urban Design:
  - Include "enhanced landscape buffers."
- S-20. Parks and Open Space:

I.F. City Center Plan Policies & Design Principles

- I-30. Land Use Policies:
- CCLU 6. "Landscaped buffers should be provided with pedestrian connections from the adjacent residential to the City Center."
- Add new policy. "CCLU 8. Establish a Parks and Trails Level of Service specific to the City Center. The City's existing adopted LOS of 1 acre/1000 population would not reflect the needs of the City Center population."
- Add new policy. "CCLU 9. Establish Park Mitigation Requirements. Fee for off-site development of park/recreation facilities if new development does not or cannot provide recreation space. The fee should be sufficient to acquire and develop the park area that would otherwise be required."
- I-35. Urban Design:
  - CCUD 18 "...and should include directional and historic signage, trailheads and landscaping to create a safe and comfortable pedestrian
environment. Design of trail and amenities should be consistent with existing Interurban Trail from Shoreline to South Everett.

II. B. Land Use

II-12. Surrounding Area:

- Add to list of locally significant historic sites:
  - Wickers Store – 3520 196th St. SW (moved to Heritage Park 2003, 19921 Poplar Way)
  - Superintendent’s Cottage and Water Tower – 3404 196th Pl. SW (moved to heritage Park 2003, 29921 Poplar Way)
- Add to list of other historic sites:
  - Scriber Lake Park – 5322 198th St SW

III. F. Public Spaces

III-68. 4. Parks and Open Space, Table 3-10:

- In addition to population increase, consider impact of additional work force (III-42, Table 3-5) on planned and existing parks, open space and recreation facilities. Consider level of service for weekday user vs. evening user vs. weekend user.
- Add trails to table? We have 6.8 miles of trails developed outside of parks. The accepted standard is 0.25-miles/1000 population. We currently have a deficit of 1.66 miles of trails.

(1) The above comments were included in a memo by Craig Larsen, Parks, Recreation and Cultural Arts Director (9/4/2003) on the Early Draft Supplemental EIS for the City Center Sub Area Plan Planned Action.

John Anderson
The following are comments by John Anderson, ERC Community Representative:

I.E.2. Major Similarities and Differences Among City Center Alternatives

- "Boulevard Streets would not have on street parking." (Pg. 1-17) No provisions have been made for bus or taxi pull offs. However, Boulevards and Streets have three lanes in each direction, so the outside lane could be used as a stop lane. Perhaps the large buildings could have special pull offs? And probably will?

I.E.2. Major Similarities and Differences Among City Center Alternatives

- Fig. 1-2 (pg 1-18). Does not include direction arrows and parking identification.
I.E.3. Major Features of Alternatives - No Action

- "The convention center could attract some development on adjacent sites. This development might or night not be supportive of convention center activities." (Pg. I-19). Does this mean adjacent development might not be associated with the Convention Center?


- 198th Street (Pg. 1-20, 21). Should 198th Street be called a Promenade Street?
- Figure 1.3 (Pg. I-21): The "white space" at 49th and 200th should be identified.

II.B. Land Use – Surrounding Area

- Regarding Wickers Store (Pg. II-12). Paragraph on historic buildings should be updated to identify the newly dedicated Heritage Park and indicate that the Wickers Store, Alderwood Manor Demonstration Farm Caretakers (Alderwood Manor Heritage Association) Cottage and Water Tower, and Humble Residence are located in the new park. The list of Lynnwood historic sites should also include the former Hunter homestead property (a portion of which is now Pioneer Park – 18400 36th Ave W)

II.B. Land Use – City of Lynnwood Zoning

- Table 2-2 (Pg. II-18): Several Commercial zones and RMH zone do not have height limits. Will the new zoning designations in the City Center Sub-area have height limits? If not, will any analysis be done to ensure that future buildings will not infer with local airplane flight paths?

III. Natural Environment

- Water Quality III-6: Concern about the "possible input of ground water stream" and "evidence of hydrocarbon pollution (oily sheat or odor) in Scriber Creek tributaries" (Pg. III-6). The main concern is the need to keep improving the quality of runoff water. The report indicates enhanced standards will result in improvements.

III.C. Plans, Policies and Regulations

- Sub-area Plans and Land Use Element Goals, Subgoals and Objectives
  - "Substantial ground level landscaping should be required for increases in building height" (Pgs. III-36). The DSEIS or Sub-area plan should explain how this could be accomplished.

Even with normal height buildings, the City requires substantial landscaping that would be hard to increase.

Overall I think this is a good report!
Arnold Kay
The following are comments by Arnold Kay, Public Works Development Services Supervisor:

- Page II-3 contradicts III-8: The WDFW has confirmed occasional sightings of adult coho in Scriber Creek up to river mile 4.5 at Highway 99, which is northwest of the City Center.
- Page III-8 contradicts II-3: In addition, a barrier to fish passage on Scriber Creek appears to block anadromous fish passage to Scriber Creek and its tributaries upstream of 44th Avenue W, including all of the tributaries in the City Center area.
- Page III-103 Transportation Improvements:
  It should read as follows:
  - Install one signal at 40th Avenue W and 200th Street W.
  It should read as follows:
  - The following unsignalized intersections will need to be signalized by 2010: 48th Avenue W and 194th Street SW; and 40th Avenue W and 200th Street SW.

Darryl Eastin
The following are comments by Darryl Eastin, Community Development Senior Planner:

Air Quality
I.C. Prior Planning and Environmental Review

- "A more detailed discussion of air quality impacts is being deferred, ...until further discussion on the City Center Plan alternatives is established and improvement projects are planned in greater detail. The greatest contributor to potential future air quality impacts will be traffic congestion... The City Center sub-area plan, and traffic analysis in this SEIS will identify a potential package of such improvements, which will then undergo additional planning, analysis and testing... The package of improvements that emerges from this process will then be planned, designed and further evaluated for environmental consequences... An air quality conformity analysis as required by WAC 173-420-100, will be performed in the context of this supplemental planning" (pg. I-10). When is it anticipated that an air quality conformity analysis and more detailed discussion of air quality impacts will be done? Would the analysis and discussion be completed prior to adoption of a planned action ordinance, if the City decided to pursue a planned action for the sub-area?
- Microscale air quality impact analyses were performed for six signalized intersections where expected project traffic would decrease level of service (LOS) for the Regional Express Lynnwood Project Environmental Assessment (EA). In instances where an intersection LOS would decrease to “D” or worse as a result of project traffic, that intersection was examined for potential analysis with dispersion modeling.
According to the EA, this approach is consistent with the requirements of the “transportation conformity analysis” under federal and state air quality rules for transportation projects in “nonattainment” or “maintenance” areas.

- Consistent with the environmental assessment conducted for the transit center project, microscale air quality impact analyses should be performed for signalized intersections within or near the sub-area where the LOS would decrease to “D” or worse as a result of the planned development described in the adopted Alternative or level of development described in a Planned Action.

**Water Quantity**

**III.A.3. Fish Habitat**

- “The following BMP’s are recommended for mitigating water quality impacts during construction of the City Center...” (Pg. III-9). Existing development in the Sub-area is probably significantly out of compliance with current City and state stormwater management standards. The management of storm water quantity should also be identified as an impact to be mitigated.

**Planned Action**

**Summary of Alternatives, Environmental Impacts and Mitigation Measures**

- “The City may decide to designate the study area as a “planned action” pursuant to the State Environmental Policy Act... The City is still developing the detailed mitigation program that would be needed to support a planned action.” (Pg. S-6). Without knowing how the proposed traffic mitigation measures are going to be funded, it is not possible to know at this time if they will all be funded. Therefore, it is not possible to know if proposed traffic mitigation measures are capable of being accomplished. According to WAC 197-11-660, any governmental action on public or private proposals that are not exempt may be conditioned or denied under SEPA to mitigate the environmental impact subject to several limitations: Limitation (c) states that, mitigation measures shall be reasonable and capable of being accomplished. If the City decides to designate the Sub-area plan (one of the alternatives) as a “planned action”, it should be demonstrated that the proposed traffic mitigations measures are capable of being accomplished.

**III.H. Transportation**

- 2010 City Center Alternatives – Traffic Impacts
  - “The intersection LOS calculations shown in Table 3-25 indicate that,..., no intersection in the City Center would operate at LOS F... Therefore, 2010 traffic conditions would meet the City’s adopted concurrency standard. It is not anticipated that additional mitigation would be needed. Funding sources for the transportation improvements (mitigation) would need to be identified, however.” (Pgs III-107, 108). See comment above about demonstrating that mitigation measures are capable of being accomplished.
Historic Resources

III. Historic & Cultural Resources

• “While the Lynnwood area has a rich and interesting history, here are no identified historic or cultural resources located within the City Center sub-area and a low potential that such resources would be present” (pg. III-5). The former Masonic Temple (Robert Burns Lodge No. 243) (19525 36th Ave W) and former Manor Hardware building (19500 36th Ave W) are identified historic resources located within the City Center sub-area. The Masonic Temple was constructed in 1921. The Vietnamese Christian & Missionary Alliance Church of Everett is the current property owner. The Manor Hardware building, originally built as a model school by the Puget Mill Co., was remodeled in 1922 into a real estate office for Puget Mill. Both buildings have National Register potential (I-5/196th Interchange Project EIS: Alderwood Manor Archeology and Historical Resources 10-16-92). Both buildings are listed in the Table of Sites and Structures with Historic Interest in the Background Report for the City’s Comprehensive Plan.

• The City Center Sub-area Plan should include a policy that calls for the preservation, restoration or remodel of these structures in such a way that historical significance is maintained.

Proposed Land Use Regulations

21.60.400 Basic Development Standards – Far Bonuses and Additional Building Height

• The proposed land use regulations allow FAR and building height bonuses for providing certain features such as street level retail, public plazas, public art and others.

• Did the Sub-area DSEIS account for or make assumptions about the utilization of bonuses for additional FAR and building height and resulting potential increase in environmental impacts (e.g. traffic, parking, etc.) and possible need for additional mitigation? If not, this issue should be analyzed prior to or during the process to decide if the Sub-area Plan should be designated a “Planned Action”.
APPENDICES
Appendix A

DISTRIBUTION LIST
DISTRIBUTION LIST

Federal
U.S. Army Corps of Engineers
U.S. Environmental Protection Agency

State
Office of Community Development (DCD)
Department of Ecology (2)
Department of Fisheries
Department of Natural Resources
Department of Transportation (WSDOT)
Department of Wildlife- Region 4 OFC

Regional Agencies
Puget Sound Council (PSRC)
Community Transit
Sound Transit
Alderwood Water District
Puget Sound Clean Air Agency
METRO

Snohomish County
Planning and Development Services Department
Public Works Department
Parks and Recreation Department

Cities
City of Edmonds
City of Mountlake Terrace
City of Brier
City of Everett
City of Mukilteo
City of Mill Creek
City of Bothell
Town of Woodway

Other Early Draft SEIS Recipients
The Boeing Company
Everett Herald
Enterprise Newspapers
Edmonds Community College
Everett Library
Edmonds Public Library
Edmonds Community College Library
Edmonds School District 15
Snohomish County PUD #1
Verizon
Snohomish County Master Builders Association
South Snohomish County Chamber of Commerce
Washington Natural Gas Company
The Tulalip Tribes

City of Lynnwood
Mayor
City Council (7)
Planning Commission (6)
Parks and Recreation Advisory Board
City Attorney
Planning Department
Public Works Department
Parks and Recreation Department
Police Department
Fire Department
Lynnwood Library

Individuals
John Anderson (Environmental Review Committee)