

**City of Mountlake Terrace**  
**Addendum to the Town Center Planned Action Environmental Impact Statement**

**I. Proposed Action**

The City of Mountlake Terrace is proposing minor amendments to the Planned Action Ordinance (No. 2457), adopted in September 2007, which designated the Town Center Subarea as a Planned Action. The proposed amendments include the following:

1. Expansion of the boundary of the “Planned Action Area” (Exhibit A of Ordinance No. 2457) to incorporate an additional approximately 11 acres of land. The revised Planned Action Area would encompass a total area of approximately 68 acres and would conform to the currently designated boundaries of the Town Center subarea and the Downtown Community Business zoning classification; and
2. Revision of the development thresholds and transportation thresholds (Ordinance No. 2457, sections 19.090.D.2 and 19.090.D.4(a)) to account for the additional development estimated to occur by 2025 within the revised Planned Action Area.

No changes to existing land use or zoning designations are proposed or necessary to implement the proposal. However, in the future, the City may modify the “Building Type” that is applicable to the two areas (containing 23 separate parcels of land) located north and south of 235<sup>th</sup> Street SW, between 56<sup>th</sup> Avenue SW and 58<sup>th</sup> Avenue SW, in the Planned Action Area. These could change from Building Type D (3 stories) to Building Type C (4 stories), perhaps as an incentive for additional environmental or community benefits, such as by a transfer of development rights. This potential future change would require amendment of the Town Center Subarea Plan sub-district map, and the building district map in the zoning chapter for the Downtown Community Business district.

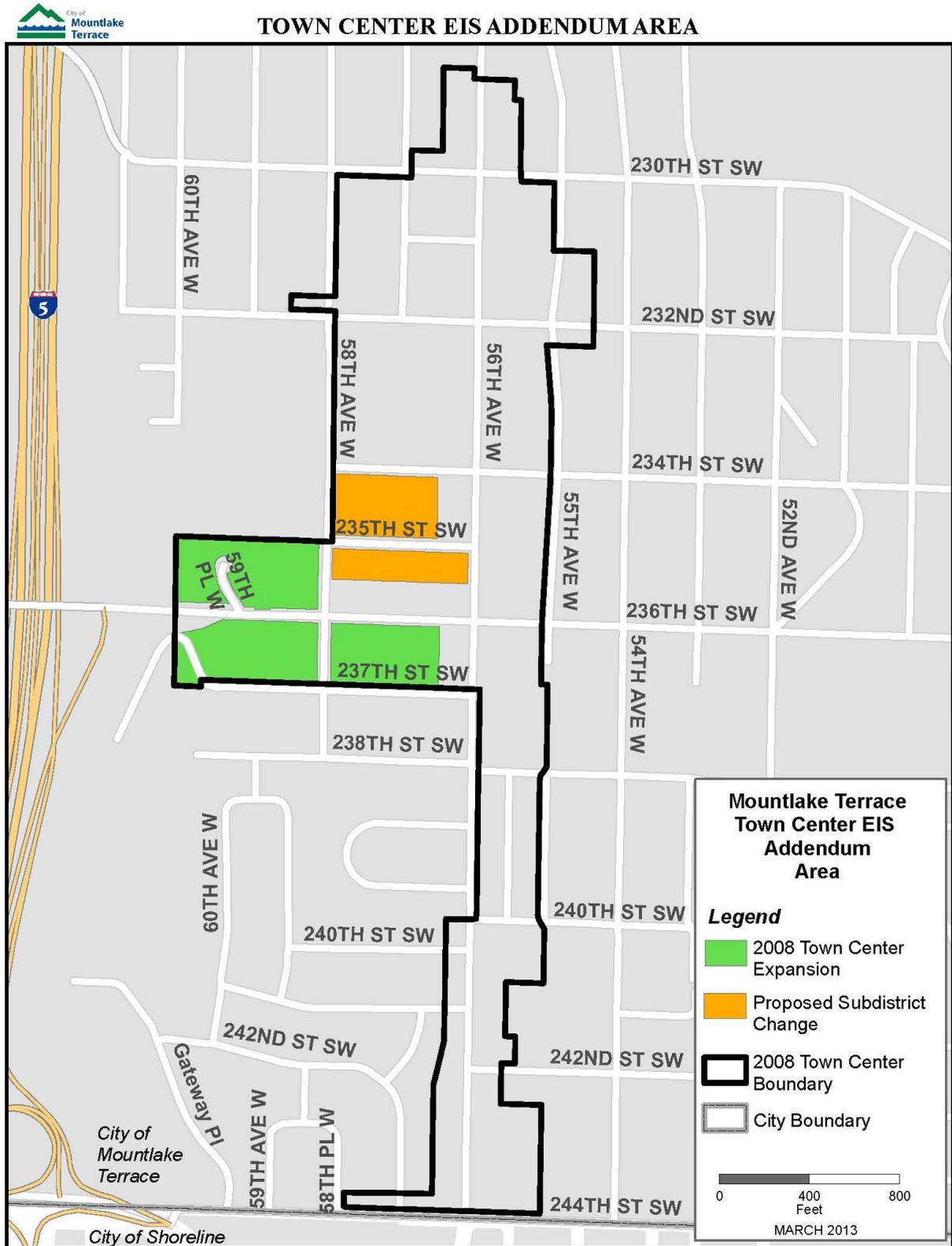
The additional development capacity that is associated with the expanded Planned Action Area is calculated as 389 multi-family dwelling units, 13,400 square feet of commercial/office development, and 20,100 square feet of retail development. **Table 1** shows the land use thresholds contained in the currently adopted Planned Action Ordinance, and the additional and total development that is assumed to occur by 2025 within the expanded Planned Action Area.

**Table 1. Existing and Revised Development Thresholds**

Land Use	Adopted Planned Action Threshold	Proposal -Additional Development	Revised Planned Action Development Threshold
Housing	737 dwelling units	389 dwelling units	1,126 dwelling units
Retail	267,700 square feet	20,100 square feet	287,800 square feet
Office/Commercial	177,299 square feet	13,400 square feet	190,699 square feet

This Addendum to the 2007 Town Center Planned Action EIS has been prepared consistent with applicable state and City SEPA requirements (WAC 197-11-625, and MTMC 16.05.210). As described further below, the Addendum concludes that the incremental increase in development capacity associated with the expanded Planned Action Area boundary, shown in **Table 1**, would not generate new or significantly different impacts beyond those identified in the Town Center Planned Action Environmental Impact Statement (EIS).

Figure 1. Revised Planned Action Area



## **II. Background and Objectives of the Proposal**

In 2007, the City prepared a subarea plan and updated zoning regulations and design guidelines for the Town Center. The City also prepared and published Draft and Final EISs for the subarea plan and zoning regulations, and subsequently adopted an ordinance (No. 2457) designating the 57-acre Town Center subarea as a “Planned Action.” The Planned Action process is discussed further below.

In 2008 and 2012, the City Council adopted amendments to the Comprehensive Plan land use map and to the zoning map to re-designate the 11 acres of land that are the subject of this Addendum as “Town Center.” This addendum addresses the impacts associated with incorporating these lands into the designated Planned Action Area.

The major objective of the proposal is to adjust the designated Planned Action Area boundaries to conform to the existing Town Center boundaries shown on the adopted Comprehensive Plan land use map, the Town Center Plan map and the zoning map (BC/D zone). As revised, the Planned Action would provide an incentive for desired development and would help to implement the goals and objectives of the Comprehensive Plan and the Town Center Plan. The Town Center Plan includes multiple objectives relating to Livability, Transportation, Open Space and Environment, Economy, Urban Design, and Planned Action Designation.

## **III. Planned Action**

A Planned Action is a tool that cities planning under the Growth Management Act (RCW 36.70A) may use to provide regulatory certainty and encourage economic development. This tool is permitted by state law (RCW 43.21C.031 and WAC 197-11-164) and operates by performing up-front SEPA review for a subarea plan and/or a specific geographic area as a way to streamline SEPA review for subsequent projects that are consistent with the plan. A Planned Action is designated by ordinance following preparation of an EIS that evaluates the impacts of planned growth and identifies mitigation measures that the City will require of the development. A Planned Action Ordinance includes the following information:

- Designates the Planned Action Area;
- Identifies the types of projects and total amount of development that will be considered Planned Actions for purposes of SEPA compliance (certain types of development, such as essential public facilities, are not eligible);
- Contains a finding that environmental impacts have been adequately addressed in the EIS prepared for the sub-area plan;
- Identifies conditions or mitigation measures that will apply to implementing projects;
- Shows how the designated project meets the statutory definitions and criteria of a Planned Action.

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

- Is it the type of project anticipated in the subarea plan?
- Does it meet the conditions and mitigation requirements of the planned action?

- Have the significant environmental impacts been addressed in the EIS?

If a development proposal meets these criteria, then it qualifies as a Planned Action project and no SEPA threshold determination is required. Developers may still propose projects that do not qualify as planned actions; however, they would perform their own SEPA analysis.

The City prepared an EIS in 2007 to support designation of the Town Center as a Planned Action and adopted a Planned Action Ordinance (Ordinance No. 2457) meeting all requirements of state law. The ordinance included a map showing the Planned Action Area, and identified the total amounts of various land uses and PM peak hour trips that would be considered Planned Actions. The Proposed Action would modify these three elements of the Planned Action Ordinance—the Planned Action Area, total land use and PM peak hour trips—to reflect the additional approximate 11 acres in the Town Center that are being added to the Planned Action. All other provisions of Ordinance No. 2457, including the mitigation measures required by Ordinance No. 2457 for Planned Action projects along with any minor amendments to be incorporated into a new Planned Action Ordinance, would apply.

#### **IV. Prior SEPA Review & Scope of Addendum**

In 2007, the City prepared Draft and Final EISs to support adoption of the Town Center Plan, amendments to the applicable zoning classification (Downtown Community Business), and designation of the Town Center as a Planned Action. The prior EIS identified significant impacts and mitigation measures for the following elements of the environment: land use, housing and employment; transportation; air quality; aesthetics; public services; and utilities. Identified mitigation measures were also incorporated into the 2007 Planned Action Ordinance (Exhibit B) and will apply to subsequent development within the Town Center Planned Action Area. The 2007 EIS was not challenged.

To meet SEPA requirements for the current proposed action, the City is adopting the 2007 Town Center EIS (per WAC 197-11-630) and providing additional information about impacts in this Addendum. This analysis has verified that the proposal would not change the conclusions of the 2007 EIS, would not result in impacts that are substantially different in type or magnitude from those identified previously, and would not require additional mitigation measures. Pursuant to the SEPA statute and rules, an Addendum is an appropriate SEPA document in these circumstances (RCW 43.21C.034, and WAC 197-11-625 and 197-11-706).

#### **V. Additional Environmental Information**

##### **Land Use Pattern, Housing and Employment**

###### ***Land Use Patterns***

The additional 11 acres proposed to be added to the Town Center Planned Action Area have the same zoning designation as the rest of the Town Center (Downtown Community Business). These additional lands would, therefore, be developed with a similar mix of uses and at similar densities to what is planned for the Town Center sub-area overall. The 2007 EIS identified the intensification of land use, taller buildings and potential conflicts with adjacent lower density uses in some locations as the principal impacts that could occur from the Town Center Plan. The

EIS also concluded that proposed and subsequently adopted zoning standards and design guidelines would mitigate these impacts.

The Proposed Action represents a minor intensification of development within the Planned Action Area and would not result in impacts that are significantly different in type or degree than what was evaluated in the 2007 EIS. Development would be consistent with and would reinforce the land use pattern planned for the Town Center overall. Adopted mitigation measures in the Planned Action Ordinance (Exhibit B) would address any impacts associated with the increased development; no additional mitigation measures are required.

***Housing and Employment***

As shown in **Table 1**, the Proposed Action would add 389 multi-family housing units, 20,100 square feet of retail development, and 13,400 square feet of commercial/office development. Additional population and jobs associated with the increased development potential, assumed to occur by 2025, is shown in **Table 2**.

**Table 2. Proposed Action Additional Housing, Population and Jobs**

	<b>Adopted Planned Action/ 2007 EIS</b>	<b>Proposed Action Addition</b>	<b>Additional/Total Population</b>	<b>Additional/Total Jobs</b>
Housing and population quantity	737 housing units	389 housing units	+856 persons 2,477 total population	---
Retail and Commercial	444,999 sq. ft.	+33,500 sq. ft.	---	+80 jobs 1,496 total jobs

The proposed increase in housing units would add housing and population capacity in the Town Center Planned Action Area. Zoning to allow this additional housing was previously applied to the Town Center sub-area, and the only change proposed at this time is to include this additional housing and associated population within the Planned Action. Similarly, the increase in employment uses and associated jobs is already permitted by existing zoning, and the only change proposed is to include this additional development within the Planned Action.

An increase in population or jobs is not itself an adverse impact, provided that adequate infrastructure and services are available to support planned growth. Subsequent sections of this Addendum conclude that the additional development would not result in new or different impacts to transportation, public services or utilities.

The 2007 EIS also noted that the housing and employment capacity in the Town Center, if realized, could exceed the City’s 2025 population targets. The Proposed Action would increase the potential that this exceedance could occur. For cities, exceeding the population or employment target within an Urban Growth Area is not inconsistent with the provisions of the Growth Management Act and is not considered an adverse impact.

**Aesthetics**

The “Building Prototypes” graphic in the Town Center Plan designates the proposed additional Planned Action Area parcels located north of 236<sup>th</sup> Street SW and south of Veterans Memorial

Park as Medium Mixed Use A (5 stories), and designates the area south of 236<sup>th</sup> Street SW as Medium Mixed Use B (4 stories). These buildings would be located on the western edge of the Town Center, which is proximate to the transit center and Interstate 5. In general, the intensity and height of these buildings would be consistent with the pattern of building heights in the Town Center, i.e., heights are typically lower for buildings adjacent to existing single family residential neighborhoods.

The potential future change in Building Prototype designation for the areas north and south of 235<sup>th</sup> Street SW, between 56<sup>th</sup> Avenue SW and 58<sup>th</sup> Avenue SW would change these parcels from Small Mixed Use to Medium Mixed Use, and would increase the height limit from 3 stories to 4 stories. These building heights and densities would be consistent with those that apply to surrounding properties in the Town Center. Potential aesthetic impacts identified in the 2007 Town Center EIS relate to contrasts in height and bulk with adjacent lower density residential uses on the border of the Town Center, shading and light and glare. Impacts of the Proposed Action would be the same.

### **Transportation**

The methodology used to evaluate the transportation impacts of the additional development capacity in the revised Planned Action Area is documented in Appendix A (ICF Transportation Memorandum, January 26, 2012). In general, it involved updating the land use data to account for the additional residential, commercial and retail development; modeling the increased traffic volumes for 2025; and identifying level of service (LOS) impacts at study area intersections.

Three 2025 scenarios were studied:

- “2025 No Action,” which corresponds to the No Action Alternative analyzed in the 2007 EIS;
- “2025 Planned Action,” which corresponds to the original proposal as described and analyzed in the 2007 EIS;
- “2025 Planned Action Addendum,” which corresponds to the revised Planned Action Area and the additional development that is analyzed in this Addendum.

The additional development associated with the 11-acre expansion of the Planned Action Area would generate an additional 375 PM peak hour trips. As shown in the Transportation Memo (Appendix A, Exhibit A), intersections where the LOS standard would be exceeded in 2025 are the same under the adopted Town Center Planned Action and under the revised Planned Action Area scenario. While there would be slight (1 to 3 seconds) increases in delay at some intersections, LOS would not worsen at any intersection. Traffic impacts, therefore, would be the same as those identified in the 2007 EIS. Impacts to parking, transit, and non-motorized transportation would also be the same as identified in the 2007 EIS.

Appendix A of this Addendum describes the mitigation measures that were identified in the 2007 EIS and incorporated into the adopted Planned Action Ordinance (Exhibit B). These improvements were tested to ensure they would be adequate for the revised Planned Action Area. As documented in Appendix A, these measures would be sufficient and no additional or different mitigation is required.

## **Air Quality**

The 2007 EIS did not identify significant impacts to air quality from the Town Center Plan. The relatively small increase in PM peak hour traffic resulting from the 11-acre expansion of the Planned Action Area, and the effects of additional construction activity, are not expected to result in significantly different impacts to air quality.

## **Public Services**

The additional housing and employment associated with the revised Planned Action Area (856 persons) would result in a minor, incremental increase in demand for public services, including police, fire/EMS, parks and schools. The use of existing facilities could also intensify. Although the City has not adopted level of service standards for most public services, increased demand is likely to be somewhat proportional to the estimated incremental increase in population (856 people) and jobs (80) between now and 2025. Economies of scale would also be a factor, however, i.e., many service delivery systems can absorb incrementally greater demand without a need to expand personnel or facilities.

The increase in population and employment would generate incrementally greater demand for fire and emergency medical services. The 2007 EIS concluded that the Fire District had sufficient capacity to serve the Town Center overall, and the increased demand would not result in a significant additional impact. Fire safety needs (such as a ladder truck for taller buildings) in the Town Center overall are available from Fire District 1, the agency with which the City contracts for fire safety service; mitigation for this impact is addressed in the 2007 EIS and the Planned Action Ordinance. The increase in population and employment could generate increased demand for police service. The City has not adopted a level of service for police. Using the current ratio of police officers to population (1.5 per 1,000), the Proposed Action would imply a need for approximately 1.3 officers. However, mixed use districts (i.e., areas of mixed commercial and residential uses, such as provided in the City's Town Center) have been identified in some studies (e.g., *Reducing Crime by Shaping the Built Environment with Zoning: An Empirical Study of Los Angeles*; Anderson, McDonald, et. al; *University of Pennsylvania Law Review*, 2013) as having a lower crime rate than in purely commercial districts.

The increase in population, and to a minor degree employment, would incrementally increase demand for park and recreation services. The City does not have an adopted level of service for parks. Applying the National Recreation and Parks (NRPA) core guideline of 10 acres per 1,000 people, the Proposed Action implies a need for 8.6 acres of parks. This need could be satisfied by the City's current parks inventory. The Veterans Memorial Park is adjacent to the additional parcels incorporated into the Planned Action Area and would provide convenient access to parks; use of this park could also increase. In addition, a 20,000 square foot public plaza is planned for the Town Square block of the Town Center and park impact fees are being collected by the City to acquire and construct it.

The Edmonds School District has sufficient excess capacity to serve population associated with the Town Center. The small increase in students generated by the additional multifamily units (68 students by 2025) would not be significant.

Overall, the type and degree of impacts to public services would be similar to those identified in the 2007 EIS.

## **Utilities**

The 2007 EIS concluded that all utilities—sewer, water, stormwater, power, gas and telecommunications—were sufficient to support planned growth of the Town Center programmed improvements and/or proposed mitigation measures. The additional demand generated by the Proposed Action would not result in significant new or different impacts.