MARCH 30, 2012

RE: Final Environmental Impact Statement for the Lynnwood Crossing Mixed-Use Project (Redevelopment of the former Lynnwood High School Campus)

Dear Affected Agencies, Organizations and Interested Parties:

Enclosed is a Final Environmental Impact Statement (FEIS) for the *Lynnwood Crossing Mixed-Use Project* proposed by the Edmonds School District and Cypress Equities Inc. The FEIS combines the information in the Draft EIS (which was released for public review and comment on October 7, 2011) together with additional information in the FEIS document. The FEIS document consists of public comments, lead agency responses, additional information about the proposal, and an updated Fact Sheet. The FEIS consists of the DEIS and the FEIS document.

The project site consists of the former Lynnwood High School campus (approximately 40 acres including the Lynnwood Athletic Complex) owned by the Edmonds School District on the north side of 184th Street SW, generally between 33rd Ave. W and Alderwood Mall Parkway.

The Proposed Action consists of the following related actions:

- Amending the Lynnwood Comprehensive Plan Map to change the land-use designation of the site from "Public Facilities" (PF) to "Mixed Use" (MU).
- Rezoning the site from "Public and Semi-Public" (P-1) to "Commercial-Residential" (C-R).
- Zoning Code text amendments to allow development of a mixed-use center.
- Amending the Lynnwood Comprehensive Plan Parks Element and the Parks, Recreation Facilities, Open Space and Trails Map to remove references to the Lynnwood Athletic Center and adjust levels of service. This amendment would occur subsequent to approval of the Proposed Action, if approved.
- Adopting a Planned Action Ordinance designating the development a planned action for SEPA purposes.
- Executing a Development Agreement with the proponents to guide development and lay out the responsibilities of the parties.
- Binding Site Plan for subdividing the site.
- Project design review and development permits including but not limited to critical area permits, clearing and grading permits, building, electrical, mechanical, sewer, water, street access, etc. permits.
Five alternative redevelopment scenarios are analyzed in the FEIS as follows (Alternatives 1 and 2 were specifically advanced by the Proponent for the Draft EIS issued October 7, 2011):

**Alternative 1:** (Project Sponsor’s Preferred Alternative with Office) would include:
- 160,000 square foot (s.f.) Costco store with fueling facility and tire center
- Seven story medical office building (150,000 s.f.)
- 330 multi-family residential units in two buildings (330,000 s.f.)
- 95,000 s.f. retail space
- 105,000 s.f. amusement/recreation including health club, movie theater and bowling
- 20,000 s.f. restaurants
Total proposed gross building square-footage is 860,000 s.f.

**Alternative 2:** (Project Sponsor’s Preferred Alternative without Office) would include:
- 160,000 s.f. Costco store with fueling facility and tire center
- 500 multi-family residential units in three buildings (500,000 s.f.)
- 105,000 s.f. amusement/recreation including health club, movie theater and bowling
- 192,000 s.f. retail
- 33,000 s.f. restaurants
Total proposed gross building square footage is 990,000 s.f.

**Other Alternatives Studied:** In addition to the two Project Sponsor’s Preferred Alternatives above, the FEIS studies the environmental impacts of three other alternatives:
- **Alternative 3:** Reduced Scale Alternative with the same mix of uses, but totaling 630,000 s.f. (approximately two-thirds to three-fourths the size of the developer’s preferred alternatives).
- **Alternative 4:** All Retail Alternative with 329,500 s.f. of retail uses including a "big-box" store.
- **Alternative 5:** No Action Alternative with 581,640 s.f. of uses such as medical offices, municipal uses, daycare, and a nursing home allowed in the present P-1 (“Public and Semi-Public”) zoning.

All alternatives include a new three-lane public street (bypass) along the west and north sides of the project linking 184th St. SW near the southwest corner of the site to the intersection of Maple Road and Alderwood Mall Parkway.

The FEIS identifies Alternative 2 above as the Preferred Alternative.

Pursuant to WAC 197-11-460(5), the City of Lynnwood shall not act on the proposal for seven days after issuance of the Final EIS.
Copies of the FEIS and associated documents are available at the City of Lynnwood Permit Center, located at 4114-198th Street SW, Suite 7, Lynnwood, WA 98036. The documents can also be reviewed on the City website at: www.ci.lynnwood.wa.us/LHSredevelopment.

Your interest in this proposal is appreciated.

Sincerely,

[Signature]

Paul Krauss, AICP
Community Development Director
SEPA Responsible Official
FINAL
ENVIRONMENTAL IMPACT STATEMENT

Comprehensive Plan Amendment

and

Zoning Map and Text Amendment

for

Lynnwood Crossing Mixed-Use Project

March 2012

SEPA Lead Agency

City of Lynnwood
This is the Environmental Impact Statement (EIS) for the proposed Lynnwood Crossing Mixed-Use Project and the non-project actions needed to implement the project. The EIS consists of this document (the Final EIS) and the Draft EIS. The purpose of the Draft EIS was to identify and evaluate probable significant environmental impacts that could result from the Proposed Action and associated project alternatives and to identify measures to mitigate those impacts. The Draft EIS evaluated the direct, indirect, and cumulative impacts of the Proposed Action and the alternatives including the No Action Alternative.

The EIS has been prepared in compliance with the State Environmental Policy Act of 1971 (Chapter 43.21C, Revised Code of Washington) and the SEPA Rules, effective April 4, 1984, as amended (Chapter 197-11, Washington Administrative Code). Preparation of this EIS is the responsibility of the City of Lynnwood. The City of Lynnwood has determined that this document has been prepared in a responsible manner using appropriate methodology and it has directed the areas of research and analysis that were undertaken in preparation of this EIS.

The environmental elements analyzed in this Draft EIS were determined as a result of the EIS public scoping process that occurred April 13, 2006, through May 4, 2006. Comments received were considered by the City of Lynnwood in determining the issues and alternatives to be analyzed in this Draft EIS. Major environmental issues evaluated in this document are earth, air, stormwater, wetlands and streams, plants and animals, environmental health (noise and soil contamination), land use, light and glare, parks and recreation, transportation, and utilities.

The Draft EIS evaluated the Proposed Action and five development alternatives; they are:

1. Alternative 1—Project Sponsor's Preferred Alternative with Office
2. Alternative 2—Project Sponsor's Preferred Alternative without Office
3. Alternative 3—Lower Intensity Mixed-Use Alternative
4. Alternative 4—All Retail Alternative
5. Alternative 5—No Action Alternative

Since the Draft EIS was issued, the Project Proponent has selected Alternative 2 as the Preferred Alternative in response to market conditions. The Proposed Action, if adopted, would allow development of the site with this alternative. In addition, the Draft EIS (Page 3-158) states that construction of the three-lane bypass roadway, which is needed to mitigate transportation impacts, is a component of the Proponent's proposal. While the bypass roadway remains a component of Alternative 2, the funding of the roadway is currently under discussion.
This Final EIS responds to comments received during the public comment period and provides additional analysis in a couple instances. It is organized into four major sections. The Fact Sheet (immediately following this Preface) provides an overview of the Proposed Action and the Preferred Alternative, its location, the approvals needed, and contact information; it is followed by the Table of Contents for this document. Chapter 1 summarizes the features of the Proposed Action and the Preferred Alternative, and provides a summary of environmental impacts, mitigating measures, and significant unavoidable adverse impacts. Chapter 2 provides additional information relating to cut and fill plans during site preparation and potential impacts associated with truck traffic, and additional information about tree removal. It also responds to a technical memorandum prepared by the Proponent in relation to improvements needed at the Maple Road/Alderwood Mall Parkway intersection (east side of Alderwood Mall Parkway). Chapter 3 provides written comments received during the public comment period and responses to the comments.

The EIS is a disclosure document. This document is not an authorization for an action, nor does it constitute a decision or a recommendation for an action. In its final form, the EIS will accompany the Proposed Action and will be considered in making final decisions concerning the Lynnwood Crossing Mixed-Use Project. It is one of several documents that will be considered in the decision-making process for this project. A list of expected permits and approvals is contained in the Fact Sheet to this EIS. The Environmental Impact Statement will accompany the applications specifically associated with those permit and approval processes.
FACT SHEET

Name of Proposal
Comprehensive Plan Amendment and Zoning Map and Zoning Text Amendment for Lynnwood Crossing Mixed-Use Project

Proponent
Edmonds School District No. 15 as property owner. The development proposal is sponsored by Cypress Equities and Costco Wholesale as developers.

Location
The location of the Proposed Action is the site of the former Lynnwood High School including the Lynnwood Athletic Complex. The 40-acre site is located at 3001-184th Street SW, Lynnwood, Washington. It is situated in the NE ¼ of Section 15, Township 27 N, Range 4 E.

Proposed Action
The Proposed Action consists of the following related actions:

- Amendments to the Comprehensive Plan and Zoning Map change of the Land Use designation of the site from “Public Facilities” (PF) to “Mixed Use” (MU), and a rezone of the site from “Public and Semi-Public” (P-1) to “Commercial-Residential” (C-R) to allow development of a mixed-use center.

- Zoning Code text amendments to allow development of a mixed-use center.

- Amendment of the Parks Element of the City’s Comprehensive Plan and the Parks, Recreation Facilities, Open Space and Trails Map to remove references to the Lynnwood Athletic Complex and to adjust level of service. This amendment would occur subsequent to approval of the Proposed Action, if approved.

- Adoption of a planned action ordinance designating the development proposal as a planned action for purposes of SEPA compliance.

- Development agreement to guide the development and the responsibilities of the parties.

- Binding Site Plan for subdividing the site.
 Alternatives

The Draft EIS analyzed five alternatives; they are:

1. Alternative 1—Project Sponsor’s Preferred Alternative with Office
2. Alternative 2—Project Sponsor’s Preferred Alternative without Office
3. Alternative 3—Lower Intensity Mixed-Use Alternative
4. Alternative 4—All Retail Alternative
5. Alternative 5—No Action Alternative

The Project Sponsor subsequently identified Alternative 2—(Project Sponsor’s Preferred Alternative without Office) as the Preferred Alternative in response to market conditions; i.e., the inability to secure a major medical office tenant.

Preferred Alternative

Alternative 2—Project Sponsor’s Preferred Alternative Without Office is proposed as a mixed-use development consisting of a Costco Wholesale facility and retail, residential, and commercial uses. Gross building area would be 990,000 square feet consisting of the following uses (square footage estimates may change as a result of final design):

- Costco Wholesale with tire center and fueling facility (160,000 sf)
- Multifamily Residential (500 Units/500,000 sf)
- Retail (192,000 sf)
- Restaurant (33,000 sf)
- Amusement/Recreation (105,000 sf)
  - Health Club (40,000 sf)
  - Movie Theater (35,000 sf)
  - Bowling (30,000 sf)

In conjunction with the development proposal, a new three-lane public bypass road would be constructed along the west and north sides of the site linking 184th Street SW to the intersection of Maple Road and Alderwood Mall Parkway.

The project would be phased as part of a master plan development. Construction of the Costco Wholesale warehouse in the northern part of the site would commence no earlier than Spring 2013. All site infrastructure (sewer, roads, drainage, etc.) would be completed as part of the Costco Wholesale construction. Construction of the southern
mixed-use portion of the site could begin as early as 2013 and take approximately 18 months to complete, although exact timing of this portion of the development would depend on economic conditions.

SEPA Lead Agency
City of Lynnwood Community Development Department

SEPA Responsible Official
City of Lynnwood Community Development Director

EIS Contact Person
Paul Krauss, Community Development Director
City of Lynnwood Community Development Department
4114-198th Avenue SW, Suite 7, Lynnwood, WA 98036
(425) 670-5401
pkrauss@ci.lynnwood.wa.us

Required Permits & Approvals

City of Lynnwood
Comprehensive plan amendment
Zoning map and text amendment
Development agreement
Planned action ordinance
Project design review
Binding Site Plan
Critical Area permit
Demolition Permit
Clearing and Grading Permits
Building Permits
Mechanical Permits
Electrical Permits
Sewer and Water Permits
Certificates of Occupancy
Street Access Approval
Miscellaneous other permits

State of Washington
NPDES permit
Clean Water Act Section 401 Water Quality Certification
Clean Water Act Section 404 Fill Permit
Hydraulic Project Approval

Authors and Principal Contributors
An EIS for the Proposed Action has been prepared under the direction of the City of Lynnwood. Research and analysis was provided by the following consulting firms:
• **Huckell Consulting Associates, LLC** – Lead EIS consultant, project management, document preparation, land use, and parks and recreation;

• **R.W. Beck Inc.** – Stormwater;

• **Gray & Osborne, Inc.** – Sewer and water utilities;

• **David Evans and Associates, Inc.** and **Heffron Transportation** – Transportation;

• **Shockey Planning Group Inc.** – Earth, soil contamination, land use, surface water, and plants and animals; and

• **Environ International Corporation** – Air quality and noise.

**Location of Background Data**

City of Lynnwood Community Development Department  
4114-198th Street SW, Suite 7  
Lynnwood, WA 98036

Huckell Consulting Associates, LLC  
14322 North Creek Drive, #1512  
Mill Creek, WA  98012  
(425) 239-4066

**Type of Environmental Review**

This EIS addresses a Planned Action. When the EIS process is complete, a planned action ordinance will define the proposal and conditions (mitigation) that must be met. Future development proposals consistent with the planned action ordinance would not require a threshold determination and further environmental review.

**Draft EIS**

The Draft EIS was issued October 7, 2011, followed by a 45-day public comment period that closed November 21, 2011. A public meeting on the Draft EIS was held on October 25, 2011, at Spruce Elementary School (17405 Spruce Way, Lynnwood, WA).

**Date of Issuance of This Final EIS**

March 30, 2012
Availability/Cost of this Final EIS

Copies of this Final EIS and/or Notice of Availability were distributed to agencies, organizations, and individuals noted on the Distribution List. Copies are also available for review at Lynnwood Community Development Department, the Lynnwood Public Library, and at the City’s web site (www.ci.lynnwood.wa.us/LHSEIS). Free copies of the Final EIS are available on compact disk. Paper copies may be purchased for the cost of copying at:

City of Lynnwood
Community Development Department/Permit Center
4114-198th Avenue SW, Suite 7
Lynnwood, WA 98036-5008
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I. CHAPTER 1

Summary of Proposed Action, Environmental Impacts, and Mitigating Measures

This section summarizes the environmental information contained in the EIS. For complete information regarding the environmental analyses, please refer to the Draft EIS and the appropriate section of this document.

The Draft EIS evaluated five development alternatives including No Action. The Project Sponsors, as part of the Draft EIS process, identified two likely development alternatives for the site. These were Alternatives 1 and 2 in the Draft EIS and each was prefaced with the phrase “Project Sponsor’s Preferred Alternative.” Subsequently, the Project Sponsor selected Alternative 2—"Project Sponsor’s Preferred Alternative Without Office" from among those evaluated in the Draft EIS as the designated “Preferred Alternative”. Preparation of the EIS is the first step in a multi-step review and decision-making process. Approvals will be requested only for the “Preferred Alternative”.

A. Description of the Proposed Action

1. Proposed Action

The Edmonds School District is planning to lease the entire former Lynnwood High School site, including the athletic fields (Lynnwood Athletic Complex), to a private developer (Cypress Equities) to allow for redevelopment as a mixed-use project. The District has entered into a development agreement\(^1\) with Cypress Equities wherein Cypress Equities would develop a mixed-use project under a ground lease with the District. The name of the proposed development is Lynnwood Crossing.

At the time of writing, the unoccupied school buildings have been demolished. The District has built a new high school approximately 3 to 3.5 miles to the east (road distance). New athletic facilities are a part of the new site.

The Proposed Action consists of the following related non-project and project actions:

- Amendments to the Comprehensive Plan to change the Land Use designation of the site from “Public Facilities” (PF) to “Mixed Use” (MU).

- A rezone of the site from “Public and Semi-Public” (P-1) to “Commercial-Residential” (C-R).

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\(^1\) Alderwood North Term Sheet for Agreement to Enter onto Ground Lease, November 2006.
- Zoning Code text amendments to allow development of a mixed-use center and fueling facility as an accessory use to the Costco Wholesale store.

- Amendment of the Parks Element of the City’s Comprehensive Plan and the Parks, Recreation Facilities, Open Space and Trails Map to remove references to the Lynnwood Athletic Complex and to adjust level of service. The amendment would occur subsequent to approval of the Proposed Action, if approved.

- Adoption of a planned action ordinance designating the site and the approved uses of the Proposed Action as a planned action for purposes of SEPA compliance.

- Development agreement to be executed that would guide the development and the responsibilities of the parties.

- Binding Site Plan for subdividing the project site.

- Project development permits and design review approvals.

The Proponent is the Edmonds School District No. 15 as property owner. The development proposal is sponsored by Cypress Equities and Costco Wholesale as developers.

2. Location of the Proposed Action

The site of the Proposed Action is the former Lynnwood High School and adjacent athletic fields (Figure 1-1). The 40-acre site is located at 3001 – 184th Street SW, Lynnwood, Washington. It is situated in the NE ¼ of Section 15, Township 27 N, Range 4 E (Snohomish County Assessor’s Tax Parcel 27041500102900).

3. Selection of the Preferred Alternative

Cypress Equities has selected Alternative 2 as the “Preferred Alternative”. There were several reasons for that decision. A medical office user interested in the site, as contemplated in Alternative I, wanted to purchase its site fee simple and was uncomfortable with a ground sublease structure. Therefore, Alternative 1 became nonviable. According to the developers, Alternative 3 does not provide the density needed to provide an acceptable economic return. Alternatives 4 and 5 were never viable options and should only be considered for comparison purposes for SEPA.
Chapter 1

Lynnwood Crossing Planned Action EIS

Figure 1-1. Site Location
B. Alternatives

1. Preferred Alternative: Alternative 2—Project Sponsor’s Preferred Alternative without Office

Development Assumptions

Alternative 2, the Project Sponsor’s Preferred Alternative, is proposed as a mixed-use development consisting of a Costco Wholesale facility, retail commercial uses, multi-family residential units, restaurants, amusement/recreation uses, and associated parking facilities. The northern portion of the site would be developed as a Costco Wholesale warehouse/store with a fueling facility and tire center. The southern portion of the site would be developed as a mixed-use retail commercial/residential center (Figure 1-2). Building heights would range from single-story to eight-story buildings. Surface parking is proposed for the north portion of the site associated with Costco Wholesale. Parking for the southern portion of the site would be provided through a combination of surface parking along internal private roads and in parking structures.

In conjunction with the proposed development, a new three-lane roadway (bypass) would extend northward from 184th Street SW along the western side of the site, and then east along the northern portion of the site where it would intersect with Alderwood Mall Parkway at Maple Road3. The City is reserving the option to expand the road to five lanes should traffic require this in the future. The Draft EIS (Page 3-158) states that construction of the three-lane bypass roadway, which is needed to mitigate transportation impacts, is a component of the Proponent’s proposal. While the bypass roadway remains a component of Alternative 2, the funding of the roadway is currently under discussion.

Internal private roads would serve the site with access from 184th Street SW (two locations) and the new bypass road (three locations). Access from Alderwood Mall Parkway via 182nd Street SW would also be provided. The layout of the southern part of the site would emphasize pedestrian connections, and landscaping would be provided along pedestrian and vehicular routes.

The total site area is approximately 40 acres. Costco Wholesale and fueling facility together with the mixed-use development would occupy approximately 35 acres. The roadway, additional right-of-way for future widening of the roadway, and a buffer along the west and northwest site perimeters would occupy the remaining area. The gross building area of the development proposal for Alternative 2 (Preferred Alternative), excluding parking, would be about 990,000 square feet. The Costco Wholesale portion

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2 Alternative 2 is discussed first in this Final EIS as it became the de-facto Preferred Alternative due to market conditions subsequent to release of the Draft EIS.

3 The alignment of the north-south section of the bypass roadway, which is also referred to in this document as 33rd Avenue W extension, is coincident with the inferred location of 31st Place W. The east-west section of the roadway would be an extension of Maple Road.
of the project would include a 160,000-square-foot warehouse with tire center and fueling facility. The gross building area of the mixed-use portion of the development on the southern half of the site would be approximately 830,000 square feet excluding parking. The specific composition (gross building area) of Alternative 2 is shown in Table 1-1.
Table 1-1. Alternatives – Lynnwood Crossing

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<th>Site size (acres)</th>
<th>1—Project Sponsor’s Preferred Alternative with Office</th>
<th>2—Project Sponsor’s Preferred Alternative without Office</th>
<th>3—Lower Intensity Mixed Use Alternative</th>
<th>4—All Retail Alternative</th>
<th>5—No Action Alternative</th>
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<td>40.22</td>
<td>40.22</td>
<td>40.22</td>
<td>40.22</td>
<td>40.22</td>
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<tr>
<td>Developed area (including roads)</td>
<td>~ 35 acres</td>
<td>~35 acres</td>
<td>~ 35 acres</td>
<td>~ 35 acres</td>
<td>~ 35 acres</td>
</tr>
<tr>
<td>Gross building area</td>
<td>860,000 sf</td>
<td>990,000 sf</td>
<td>630,000 sf</td>
<td>329,500 sf</td>
<td>581,640 sf</td>
</tr>
<tr>
<td>Uses: Multifamily Residential</td>
<td>330 units</td>
<td>500 units</td>
<td>220 units</td>
<td>None</td>
<td>None</td>
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<tr>
<td>Retail anchor</td>
<td>160,000 sf</td>
<td>160,000 sf</td>
<td>160,000 sf</td>
<td>120,000 sf</td>
<td>None</td>
</tr>
<tr>
<td>Retail major</td>
<td>50,000 sf</td>
<td>None</td>
<td>None</td>
<td>None</td>
<td>None</td>
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<td>Retail shops</td>
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<td>192,000 sf</td>
<td>45,000 sf</td>
<td>131,000 sf</td>
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<td>Amusement/Recreation</td>
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<td>105,000 sf</td>
<td>70,000 sf</td>
<td>None</td>
<td>None</td>
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<td>Market</td>
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<td>None</td>
<td>None</td>
<td>20,000 sf</td>
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</tr>
<tr>
<td>Medical Office/Office</td>
<td>150,000 sf</td>
<td>None</td>
<td>120,000 sf</td>
<td>None</td>
<td>365,900</td>
</tr>
<tr>
<td>Restaurant</td>
<td>20,000 sf</td>
<td>33,000</td>
<td>15,000 sf</td>
<td>8,000 sf</td>
<td>None</td>
</tr>
<tr>
<td>Child Daycare</td>
<td>None</td>
<td>None</td>
<td>None</td>
<td>None</td>
<td>21,000 sf</td>
</tr>
<tr>
<td>Nursing Homes</td>
<td>None</td>
<td>None</td>
<td>None</td>
<td>None</td>
<td>194,740 sf</td>
</tr>
<tr>
<td>Parking Spaces</td>
<td>3,285</td>
<td>3,548</td>
<td>2,508</td>
<td>1,789</td>
<td>2,719</td>
</tr>
<tr>
<td>New bypass roadway</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Phasing and Construction Timing

The project would be phased as part of a master plan development. In the Draft EIS, vertical construction of the Costco Wholesale was assumed to commence no earlier than May 2012 and construction was expected to take approximately 120 days to complete. At the time of the Final EIS release, construction of the Costco Wholesale is likely to occur in 2013, assuming appropriate approvals are obtained. Prior to vertical construction, the majority of site infrastructure (sewer, roads, drainage, etc.) would be completed as part of the Costco Wholesale construction. All infrastructure work would be completed prior to opening the Costco Wholesale.

Construction of the southern mixed-use portion of the development is expected to begin in 2013 depending on market conditions and take approximately 18 months to complete, although exact timing would depend on economic conditions.
2. Alternative 1—Project Sponsor’s Preferred Alternative with Office

Alternative 1 would include a Costco Wholesale facility (160,000 square feet) as described for Alternative 2, a mixed-use component with a 150,000-square-foot medical office building, 160,000 square feet of retail, 105,000 square feet of amusement/recreation space, 20,000 square feet of restaurant space, and 330 multi-family units (Figure 1-3). A seven-story medical office building would be included in this alternative.
This alternative provides less residential and retail development than Alternative 2. The gross building area of this alternative, excluding parking, would be 860,000 square feet. Similar to Alternative 2, a new three-lane bypass road would be constructed linking 184th Street SW to the intersection of Maple Road and Alderwood Parkway. The City is reserving the option to expand the road to five lanes in the future. Internal roads would also serve the site with access from 184th Street SW and the new bypass road.

3. Alternative 3—Lower Intensity Mixed Use Alternative

Alternative 3 would include the same mix of uses as Alternative 1 but at a less intensive level of development (approximately 73 percent of the gross building area of Alternative 1). Alternative 3 would include a Costco Wholesale facility (160,000 square feet) as described for Alternative 1, a mixed-use component with 45,000 square feet of retail, 70,000 square feet of amusement/recreation, 15,000 square feet of restaurants, 220 multi-family units, and 120,000 square feet of office space. It depicts a situation that provides for the same types of uses as Alternative 1, but at a scale that would result in lesser environmental impacts (Figure 1-4). The gross building area of this alternative, excluding parking, would be 630,000 square feet. Uses and their square footage are provided in Table 1-1.

The design concept for the southern portion of the site incorporates internal open space with a pedestrian plaza around which several structures with retail and residential uses would be clustered.

Similar to Alternative 2, a new three-lane bypass road would be constructed linking 184th Street SW to the intersection of Maple Road and Alderwood Parkway. The City is reserving the option to expand the road to five lanes in the future. Internal roads would also serve the site with access from 184th Street SW and the new bypass road.

4. Alternative 4—All Retail Alternative

Alternative 4 would be composed of retail uses similar to the existing peripheral retail uses around Alderwood Mall including some limited restaurant uses (Figure 1-5). The retail center would be comprised of up to 14 structures, including an anchor retail store of approximately 120,000 square feet in the northern part of the site, one major retail store of approximately 50,000 square feet in the southwest corner of the site, and several smaller retail spaces (including a boutique market) on the remainder of the site.

Costco Wholesale and fueling facility would not be included in Alternative 4. The gross building area of this alternative, excluding parking, would be 329,500 square feet. Uses and their square footage are provided in Table 1-1.

Similar to Alternative 2, a new three-lane bypass road would be constructed linking 184th Street SW to the intersection of Maple Road and Alderwood Parkway. The City is reserving the option to expand the road to five lanes in the future. Internal roads would also serve the site with access from 184th Street SW and the new bypass road.
Lynnwood Crossing
Planned Action EIS

Figure 1-4. Alternative 3—Lower Intensity Mixed Use Alternative
5. Alternative 5— No Action Alternative

Alternative 5 would include development allowed under existing land use regulations (Figure 1-6). The Land Use designation would remain “Public Facilities” (PF) and site zoning would remain “Public and Semi-Public” (P-1). Uses allowed under these designations are Residential Uses, Institutional Uses, Medical Facilities, and Municipal Uses. Specific uses assumed for this alternative would include a medical office.
building, medical and dental offices, nursing home facilities, and a child daycare facility. The gross building area of this alternative would be 581,640 square feet. The types of uses and their square footage are listed in Table 1-1.

This alternative would create a mix of uses permitted (outright or conditionally) within the current Public Use and Semi-Public Use zone. This design would include a centrally located open space surrounded by a mix of uses. Extensive open space would be provided throughout the site and around the perimeter.

As shown for Alternative 2, a new bypass road would be constructed connecting 184th Street SW to the intersection of Maple Road and Alderwood Mall Parkway. The City is
reserving the option to expand the road to five lanes in the future. Internal private roads would provide access to the various structures. These internal roads would exit the site by way of the new bypass, 184th Street SW, or 182nd Street SW.

C. Planning and Environmental Review Framework

1. The Planning Context

Comprehensive Plan and Zoning

The Growth Management Act (GMA) was passed by the State Legislature in 1990 and has since been periodically amended. It establishes a framework for managing growth and development at the local level that is described within a comprehensive plan. The plan must demonstrate how a jurisdiction plans to accommodate its share of projected regional growth, and indicate how infrastructure will be able to support such growth at an acceptable level of service.

The City of Lynnwood adopted a Comprehensive Plan under GMA in 1995 and amended it annually since then. The most recent update is the 2020 Comprehensive Plan amended by the City Council in July 2011. The next update of the Plan will reflect the provisions of the Multi-County Planning Policies of Puget Sound Regional Council’s Vision 2040 and new Countywide Planning Policies for Snohomish County, which direct and concentrate substantial portions of future population and employment growth into urban centers.

The Comprehensive Plan establishes a “Subregional Center” designation planned for increased development and diversification of land uses that includes office, retail commercial, housing, transit facilities, and mixed use developments. The intent is to provide for a mix of uses that would provide economic development and redevelopment opportunities. The Subregional Center encompasses the Alderwood Mall/44th Avenue West/I-5 area, including the site of the Proposed Action.

The Comprehensive Plan also provides for a Mixed Use (MU) land use category. The Land Use Element of the Plan describes the Mixed Use category as follows:

**Purpose:** This Plan category is intended to provide the opportunity for a high intensity development of mixed uses that will result in a pedestrian friendly environment and support transit development and usage.

**Principal Uses:** Residential, office, or retail uses will be permitted within the same building or on the same site(s).

**Locational Criteria:** This category of use is suitable for locations only within the subregional center and college district.
**Site Design:** A combination of surface and structured on-site parking is anticipated. On-site open space, landscaping, and recreational amenities should be emphasized when residential use is included in the mix of uses.

**Building Design:** Most buildings will be multi-story. Residential uses will typically be located on upper floors above commercial uses.

Edmonds School District submitted a request for a Comprehensive Plan Amendment with subsequent rezone on March 1, 2006. This resulted in preparation of an EIS, although for a different development concept than evaluated in this EIS. That application and EIS process (an EIS was never released) was put “on hold” in February 2009 at the request of the applicant due, in part, to the recent economic recession. A substantially-revised development concept was submitted in December 2010.

A text amendment to the Commercial-Residential (C-R) zone is required to allow development of the proposed combination of Costco Wholesale and certain components of the mixed-use center. The proposed text amendment revises the purposes of the C-R zone to read as follows:

“This Commercial-Residential zone is intended to implement the future land use plan map by allowing development of a mix of commercial and residential land uses that can be supported by transit facilities. The key concept is to locate complementary land uses within convenient walking distance of each other connected by safe, direct pedestrian-oriented walkways. A wide variety of commercial uses are permitted in this zone in order to promote development of commercial centers that serve both nearby residents and users of the transit facilities. Multiple-family residences are permitted at these properties to provide the opportunity to live and work at a single property and the opportunity to walk to stores, services, entertainment and other activities; and to promote the use of public transit, carpools or vanpools for commuting or other travel.”

Full text for the C-R zone with proposed text amendments is provided in Appendix A of the Draft EIS.

**2. Planned Action**

The EIS has been prepared to enable the City to consider designating the site area as a “Planned Action” pursuant to the State Environmental Policy Act (SEPA) and the rules implementing SEPA (RCW 43.21C.031 (2)(a) and WAC 197-11-164). A planned action is a project action that is designated by ordinance, has had significant environmental impacts addressed in conjunction with a master planned development or phased project, is located within an urban growth area, and is consistent with the City’s Comprehensive Plan. A Planned Action EIS provides for environmental review early in the planning process, and the opportunity for timely and efficient review of future development proposals that are consistent with the planned action ordinance.
To designate a planned action, the ordinance adopted by the City needs to describe the types of projects to which the planned action applies (i.e., the specific uses proposed for development), and how the planned action meets the criteria in the SEPA rules (WAC 197-11-168). The ordinance also must find that the environmental impacts of the planned action have been identified and adequately addressed in an EIS, identify mitigating measures that must be implemented for the project to qualify as a planned action, and specify a time period that will apply to the planned action.

This EIS is intended to identify the environmental impacts and mitigating measures for the Lynnwood Crossing Planned Action. When the EIS process is complete, a planned action ordinance will set forth uses allowed on the site and conditions (mitigation) that must be met. A planned action ordinance is only appropriate if it is determined that significant environmental impacts have been adequately addressed in an EIS. Any changes to the Preferred Alternative after the Final EIS is issued may result in abandoning a planned action approach.

If a planned action ordinance is adopted for the site, future development proposals consistent with the planned action ordinance would not require a threshold determination and further environmental review if the development and impacts are consistent with the planned action ordinance.

3. Lynnwood Athletic Complex

The southern part of the site has been used as the Lynnwood Athletic Complex. Please see the Parks and Recreation section in the Draft EIS for a discussion of the Lynnwood Athletic Complex, commitments under the existing Inter-Local agreements including City of Lynnwood investment in the facilities, the roles of the City and School District in its operation and maintenance, and impacts and mitigating measures.

4. Scoping

The EIS public scoping process occurred April 13, 2006, through May 4, 2006. Comments received were considered by the City of Lynnwood in determining the issues and alternatives to be analyzed in the EIS. Major environmental issues evaluated in this document are earth, air, stormwater, plants and animals including wetlands, environmental health (noise and soil contamination), land use, parks and recreation, transportation, and utilities. The City of Lynnwood has opted to add an analysis of lighting impacts to the scope of the EIS.

D. Summary of Environmental Impacts, Mitigating Measures, and Unavoidable Adverse Impacts

Impacts, mitigating measures, and unavoidable impacts are summarized below for each element of the environment.
Summary of Environmental Impacts, Mitigating Measures, and Unavoidable Adverse Impacts for the Preferred Alternative: Alternative 2—Project Sponsor's Preferred Alternative without Office

Earth

Potential Impacts

Construction

The site would be graded relatively flat to match the existing topography as much as possible, sloping generally from south to north and from west to east. This would require cuts in the south portion and filling in the north and east portions. Estimated earthwork quantities reported in the Draft EIS for Alternative 2 range between 350,000 to 400,000 cubic yards (cy) that would be used as fill elsewhere on-site. Since the Draft EIS was completed, it is estimated the project could require export of up to approximately 120,000 cy of material (see Chapter 2—Additional Information). The need for export is dependent on soil conditions.

One known and one suspected underground storage tank (UST) are present on site. No soil contamination was found near the USTs, although contamination was discovered near the former Building B. Remediation would be accomplished by removal of contaminated soils. A voluntary clean-up plan will be submitted to Ecology. Remediation work would occur during site preparation activities.

If dewatering is required, the water would be routed around the activity, discharged to a controlled conveyance system, and conveyed to the onsite sediment pond.

Erosion and sedimentation could occur in the absence of temporary erosion and sediment control measures.

Impacts during construction are expected to be minor.

Operation

Increased impervious surfaces would lead to higher levels of stormwater runoff, which would be managed with a permanent stormwater management system (see Stormwater section). Impacts during operation are expected to be minor.

Mitigating Measures

For construction, a two-phase Temporary Erosion Control Plan would be prepared to reduce the potential impacts of erosion that includes Best Management Practices (BMPs) (i.e., temporary sediment ponds, interceptor ditches, check dams, rock construction entrances, filter fabrics siltation fencing, catch basin inlet protection, hydro
seeding, mulching, and stockpile protection). A Stormwater Pollution Prevention Plan would be prepared in accordance with Department of Ecology requirements to help ensure that the proper temporary erosion control BMPs are in place. A permanent stormwater management plan would be implemented during operation (see Stormwater section).

To mitigate traffic impacts due to truck movements, the City will regulate hours of operation and haul routes. To mitigate truck traffic impacts on streets, the City may require the proponent to assess and document street conditions for truck routes before and after grading has taken place, and assume responsibility for street repairs resulting from truck traffic.

**Significant Unavoidable Adverse Impacts**

None.

**Air Quality**

**Potential Impacts**

**Construction**

Dust from short-term construction activities such as excavating, grading, sloping, and filling would contribute to ambient concentrations of suspended particulate matter and temporary, localized impacts to air quality. Construction vehicles and equipment, especially diesel-fueled engines, would emit air pollutants that would slightly degrade local air quality. Construction-related dust or equipment emissions could represent a health risk to sensitive individuals like the chronically ill, the old, and the very young. However, dust and diesel emissions from on-site construction would be unlikely to substantially affect air quality in the project vicinity.

Some construction activities such as paving operations using tar and asphalt would cause odors, which would be short-term and unlikely to significantly affect the nearest residences. Construction traffic could potentially cause some intermittent, temporary increases in pollutant emissions.

With implementation of the controls required for construction activities, and minimizing exposure of nearby people to emissions from diesel equipment and dust, construction would not be expected to significantly affect air quality in the Lynnwood area.
Operation

Impacts Related to Traffic

As depicted in the table below, calculated 1-hour and 8-hour CO concentrations under Alternative 2 are lower than those predicted for existing conditions and are well below the 35-ppm 1-hour and the 9-ppm 8-hour National Ambient Air Quality Standards (NAAQS) at all intersections examined.

**Calculated 2012-2013 CO concentrations (ppm):**

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Averaging Period</th>
<th>Alternative 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>196th St SW and Alderwood Mall Pkwy</td>
<td>1-hour</td>
<td>7.8</td>
</tr>
<tr>
<td>Alderwood Mall Pkwy</td>
<td>8-hour</td>
<td>6.7</td>
</tr>
<tr>
<td>30th Place W and Alderwood Mall Pkwy</td>
<td>1-hour</td>
<td>7.5</td>
</tr>
<tr>
<td>33rd Avenue W and 188th Street SW</td>
<td>8-hour</td>
<td>6.4</td>
</tr>
<tr>
<td></td>
<td>1-hour</td>
<td>5.9</td>
</tr>
<tr>
<td></td>
<td>8-hour</td>
<td>5.3</td>
</tr>
</tbody>
</table>

CO levels would comply with the NAAQS limits. No significant adverse air quality impacts would be expected.

Project-Level Conformity Determination

Traffic modeling indicates traffic related to the alternatives and construction of the new bypass road would affect intersection performance in the study area by increasing delay at some intersections, which could trigger the need for an air quality conformity review. Therefore, traffic-related air quality impacts were also considered in the horizon year of 2040, in addition to the opening year (2012). Modeling results for Alternative 2 are shown below.

The analysis determined that Alternative 2 would not cause violations of the 1-hour or 8-hour standards for CO in years 2012 or 2040. Therefore, the proposed project conforms at a project-level with the air quality conformity requirements under state and federal air quality laws. The project would not cause a new violation of an air quality standard, nor would it prolong the time required to attain a standard.
Washington State Intersection Screening Tool CO Screening
Model Results (ppm) 2040:

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Averaging Period</th>
<th>Alternative 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>196th St SW and Alderwood Mall Pkwy</td>
<td>1-hour</td>
<td>6.4</td>
</tr>
<tr>
<td>Alderwood Mall Pkwy</td>
<td>8-hour</td>
<td>5.7</td>
</tr>
<tr>
<td>30th Place W and Alderwood Mall Pkwy</td>
<td>1-hour</td>
<td>5.8</td>
</tr>
<tr>
<td>33rd Avenue W and 188th Street SW</td>
<td>1-hour</td>
<td>6.9</td>
</tr>
<tr>
<td></td>
<td>8-hour</td>
<td>6.0</td>
</tr>
</tbody>
</table>

**Operation Impacts Related to Costco Fuel Facility**

_Emissions_

The Costco Wholesale retail fueling facility could potentially emit ambient pollutants such as volatile organic compounds (VOCs), hydrocarbons, and toxic air pollutants. The fueling facility design would include equipment of the latest technology and with many safety features to prevent potential environmental impacts, designed in accordance with local, state, and federal requirements. The Stage I EVR systems are 98 percent effective in controlling fugitive emissions from escaping into the environment. The Phase II EVR equipment controls vapors in the return path from the vehicles back to the tanks and are 95 percent effective in controlling fugitive emissions from escaping into the environment. These control technologies would also minimize the potential for odors from the fuel facility activities. The operational activities associated with the fuel facility are not likely to cause significant air quality or odor impacts.

_Emissions Related to Greenhouse Gas_

The tabulation of GHG emissions was based on the spreadsheet tool developed by King County, Washington in December 2007. The lifecycle emissions are the cumulative emissions over the expected useful life of the buildings included in the development alternatives. Comparing results of potential GHG emissions using the King County tool, it is clear that Alternative 2, with the most development square footage, has the potential to generate more GHG emissions than the other alternatives. This difference is primarily due to the amount of building construction.

Residential use is the largest contributor to GHG emissions because occupants would consume energy in the form of electricity and commuters would consume fuel. Food sales would also generate a large portion of the GHG emissions due to electricity consumption and fuel used for vehicle trips. Alternative 2 would incorporate more retail
Summary of Project-related Greenhouse Gas Emissions

<table>
<thead>
<tr>
<th>Building Use</th>
<th>Alternative 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td>489,366</td>
</tr>
<tr>
<td>Costco Food Sales</td>
<td>283,788</td>
</tr>
<tr>
<td>Food Service</td>
<td>80,879</td>
</tr>
<tr>
<td>Retail</td>
<td>231,993</td>
</tr>
<tr>
<td><strong>Total Emissions</strong></td>
<td><strong>1,086,026</strong></td>
</tr>
</tbody>
</table>

and residential development and would result in more lifecycle GHG emissions than any of the other alternatives. This would be primarily due to the amount of construction materials required and the energy consumption due to anticipated building use.

**Mitigating Measures**

Possible construction mitigation includes:

- Use only equipment and trucks that are maintained in optimal operational condition.
- Require all off road equipment to be retrofit with emission reduction equipment.
- Use bio-diesel or other lower-emission fuels for vehicles and equipment.
- Use car-pooling or other trip reduction strategies for construction workers.
- Stage construction to minimize overall transportation system congestion and delays in order to reduce regional emissions of pollutants during construction.
- Implement restrictions on construction truck idling (e.g., limit idling to a maximum of 5 minutes).
- Locate construction equipment away from sensitive receptors such as fresh air intakes to buildings, air conditioners, and sensitive populations.
- Locate construction-staging zones where diesel emissions will not be noticeable to the public or near sensitive populations such as the elderly and the young.
- Develop a dust control plan during project planning to identify sources and activities that would be likely to generate fugitive dust and the means to control such emissions.
- Spray exposed soil with water or other suppressant to reduce emissions of PM$_{10}$ and deposition of particulate matter; include dust controls on paved and unpaved roads and in site preparation, grading and loading areas.
- Cover or use moisteners or soil stabilizers to minimize emissions from storage piles; minimize drop heights involved in creating storage piles or haul-vehicle loading.
• Cover all trucks transporting materials, wet down materials in trucks, or provide adequate freeboard (space from the top of the material to the top of the truck bed) to reduce PM10 emissions and deposition during transport.

• Pave or use gravel on staging areas and roads that would be exposed for long periods, and reduce speeds on unpaved roads or work areas.

• Use quarry spalls at entrances, vehicle scrapes, or wheel washers to remove particulate matter that would otherwise be carried off site by vehicles to decrease deposition of particulate matter on area roadways.

• Remove particulate matter deposited on paved, public roads, sidewalks, and bicycle and pedestrian paths to reduce mud and dust; sweep and wash streets continuously to reduce emissions.

• Cover dirt, gravel, and debris piles as needed to reduce dust and windblown debris, and avoid dust-generating activities during windy periods.

• Route and schedule construction trucks to reduce delays to traffic during peak travel times to reduce air quality impacts caused by a reduction in traffic speeds.

(NOTE: Certain construction mitigation strategies, such as using bio-diesel vehicles, are unlikely to occur.)

Significant Unavoidable Adverse Impacts

None.

Stormwater

Potential Impacts

Construction

Total disturbed area would be approximately 35 acres; significant potential for erosion and deposition of sediments in the downstream system could occur without measures to limit erosion and treat stormwater. Such measures would be required as part of a stormwater pollution prevention plan (SWPPP); submission of a SWPPP is required by the Department of Ecology's (Ecology) Stormwater Management Manual for Western Washington.

Operation

Stormwater measures proposed by the Project Sponsor are required by regulation. In Washington State, Ecology administers the federal National Pollutant Discharge Elimination System (NPDES) Permit Program that includes regulation of municipal storm sewer systems. The City of Lynnwood is covered under the Phase II NPDES permit for western Washington. Since the Proposed Action would disturb one acre or
more, the requirements of the Stormwater Management Manual for Western Washington (SWMM) (Ecology, 2005) must be met.

The developed site would have greater impervious area than present and, therefore, higher runoff levels that would need to be managed. The total site detention volume would be increased, the 25-year inflow into the detention facilities would be greater than existing conditions, and the controlled release rate would be less than existing conditions (which includes run-on from adjacent properties). Run-off from off site that enters the site at present would be routed around the site, thereby bypassing the new on-site detention facilities.

Stormwater quality treatment would achieve at least 80-percent removal of suspended solids for the water quality flow rate.

Overall, a significant reduction in runoff rates would occur, and water quality would likely be improved. The alternatives would beneficially affect stormwater quantity and quality. Pertinent stormwater features for Alternative 2 are as follows:

- Impervious surface = 29.8 - 31.5 acres
- Detention volume = 12.2 - 12.6 acre-feet
- 25-year inflow into the detention facilities = 17.3 - 18.0 cfs
- Controlled release rate = 1.72 cfs
- Required water quality volume would be +/- 0.62 acre-feet

**Mitigating Measures**

**Construction**

Measures to handle stormwater during construction would need to meet Ecology’s 2005 Stormwater Management Manual for Western Washington and the NPDES construction permit requirements, which include water quality monitoring during construction. Because these design details are not available at this time, the additional measures listed below are preliminary recommendations and considerations rather than specific requirements. This will allow for some flexibility in the permit review process by the City. Additional measures include:

- Limit the extent of active construction areas (e.g., limiting the area of active grading to smaller areas in phases rather than the entire 35 acres at one time).
- Require the construction of the off-site runoff bypass system as an initial element of construction to prevent off-site runoff from coming in contact with disturbed areas.
- Consider implementation of filter systems (e.g., Baker tanks) and/or chemical treatment systems to treat construction water.
- In construction of the vaults, allow sufficient curing time of the concrete prior to vault operation. This would reduce the potential for high pH levels that typically occur from newly poured concrete.
- Consider the use of an independent temporary erosion and sediment control (TESC) monitor to ensure that measures put in place are functioning properly. This could be considered if City staff is not available to provide sufficient construction monitoring.

**Operation**

**Measures Required by Regulation**— Mitigating measures that are proposed by the project proponent are those required by regulation and are part of Proposed Action (i.e., runoff control, detention, and controlled releases). Since the Proposed Action would disturb one acre or more, the requirements of the Stormwater Management Manual for Western Washington (SWMM) (Ecology, 2005) must be met. The SWMM defines the minimum requirements for control and treatment of stormwater runoff from new development, redevelopment, and construction sites under ten Minimum Requirements (MR). These minimum requirements are as follows:

- MR #1: Preparation of Stormwater Site Plans
- MR #2: Construction Stormwater Pollution Prevention Plan (SWPPP)
- MR #3: Source Control of Pollution
- MR #4: Preservation of Natural Drainage Systems and Outfalls.
- MR #5: On-site Stormwater Management
- MR #6: Runoff Treatment
- MR #7: Flow Control
- MR #8: Wetlands Protection
- MR #9: Basin/Watershed Planning
- MR #10: Operations and Maintenance

MR# 9 is not applicable for this project.

Additional post-construction measures to consider include implementation of low impact development techniques as required in Minimum Requirement #5 such as constructing bio-retention areas, amending soils in landscaped areas and all pervious areas that are disturbed, providing permeable paving in lieu of conventional hardscapes, and providing roof downspout infiltration systems. During final design, the feasibility of incorporating grass-lined swales in lieu of piped conveyance systems should be investigated.

**Significant Unavoidable Adverse Impacts**

None.
Plants and Animals Including Wetlands

Potential Impacts

Construction of the bypass roadway would reduce the amount of vegetation and habitat available to wildlife in this area of the site, resulting in minor to moderate impacts. No Priority Habitats and Species or federally protected species would be affected.

The bypass roadway would be constructed through Wetland C. Development within Wetland C and its buffer would change its horizontal and vertical vegetation structure; expose soil materials and increase potential surface runoff, erosion, and off-site sedimentation; reduce wetland functions and values; and disrupt use of the area by wildlife. Without mitigation, filling of Wetland C may be considered a significant impact. With mitigation, filling of Wetland C and loss of the habitat afforded by the forested area on-site may be considered a moderate impact. No impacts would occur to Wetland A.

The total length of Tunnel Creek that is currently located on (or just north of) the project site is approximately 675 linear feet (lf), measured from the outlet of the offsite pond (to the north), to the northeast corner of the site. Of that existing length, approximately 425 lf is conveyed in an underground pipe, and 250 lf is in an open channel. The total proposed length for Tunnel Creek on the site is approximately 650 feet, measured from the outlet of the offsite pond (to the north), to the northeast corner of the site. This slightly shorter overall proposed length is due to a realigned orientation necessary for design of access roads and tie-in to the stormwater system. Of that proposed 650 lf, approximately 425 lf of Tunnel Creek will be piped (the same length as the existing condition) and 225 lf will be located in open channel. Therefore, Tunnel Creek will be located in open channel for approximately 25 lf less with the proposed project than under existing conditions; the length of stream contained within the pipe remains unchanged.

Mitigating Measures

To mitigate impacts to Wetland C, new wetland area would be created adjacent to Wetland A at a 2:1 replacement ratio in accordance with City of Lynnwood requirements. Native vegetation would be planted in the wetland mitigation area to compensate for impacts to plants and animals. Plant species would be native to western Washington and of value to wildlife for habitat and foraging opportunities. The buffers of Wetland A and Tunnel Creek would be protected, and parking lot lights would be directed away from the wetland mitigation area to minimize wildlife disturbance.

The project proposes to mitigate this impact by restoring onsite portions of Tunnel Creek with native plantings and habitat features, as appropriate. The goal is for the project to have no net loss of water quality and habitat functions associated with Tunnel Creek. The Critical Areas Report will be revised accordingly in support of construction.
permits. Final design has not yet been completed; however, it is anticipated that the new stream channel would be one to two feet deep and two to three feet wide. The stream buffer would be planted with native indigenous woody species and a seed mix appropriate to the specific conditions of the site.

**Significant Unavoidable Adverse Impacts**

With mitigation, no significant unavoidable adverse impacts are anticipated.

**Environmental Health -- Noise**

**Potential Impacts**

**Construction:**

There would be temporary increases in sound levels from construction activities that would likely exceed Lynnwood’s noise limits at locations very near the construction activity. Although construction noise is exempt from the limits during daytime hours and it is temporary, impacts may nonetheless occur at residences close to the active construction areas.

**Operation:**

Noise from parking lots is expected to be minimal, resulting in no adverse noise impacts. Noise from HVAC equipment and loading docks would be required to comply with the City of Lynnwood’s nighttime noise limit of 47 dBA, which would reduce potential noise impacts to less than significant. Noise from the Costco Wholesale fueling facility is predicted to be 47 dBA or less at the nearest off-site residences during peak activity. This level would be well below the City’s daytime noise limit of 57 dBA and would also comply with the more stringent nighttime limit of 47 dBA. Therefore, no significant off-site noise impacts are anticipated due to the Costco Wholesale fueling facility. Nighttime noise limits also would not be exceeded at new on-site residences if the facility operates before 7 a.m.

Modeled traffic noise levels at representative receptor locations are shown below for Alternative 2:
PM PEAK HOURLY Leq TRAFFIC SOUND LEVELS (dBA)

<table>
<thead>
<tr>
<th>Receptor</th>
<th>Existing Sound Level</th>
<th>Alternative 2</th>
<th>Increase Over Existing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Off-site: 17902-30th Place W.</td>
<td>59</td>
<td>60</td>
<td>1</td>
</tr>
<tr>
<td>19705-33rd Place W.</td>
<td>54</td>
<td>59</td>
<td>5</td>
</tr>
<tr>
<td>3204-180th Place SW</td>
<td>54</td>
<td>54</td>
<td>0</td>
</tr>
<tr>
<td>Alderwood Park Apts.</td>
<td>54</td>
<td>54-55</td>
<td>1</td>
</tr>
<tr>
<td>On-site: Building D</td>
<td>NA</td>
<td>55</td>
<td>NA</td>
</tr>
<tr>
<td>Building E</td>
<td>NA</td>
<td>54</td>
<td>NA</td>
</tr>
<tr>
<td>Building H</td>
<td>NA</td>
<td>59</td>
<td>NA</td>
</tr>
</tbody>
</table>

The highest calculated traffic sound level is 60 dBA at the nearest residence due north of the project site. This level would not be considered an impact using FHWA/WSDOT criteria. The largest calculated increase in sound levels in 2011 compared to existing sound levels is 5 dBA, which would occur at residences near the current eastern terminus of 179th Street SW. The increases over existing traffic sound levels at this and all other receptor locations primarily would be due to the extension of 179th Street SW and not due to the Project or the new bypass road. No significant traffic noise impacts would be expected.

Mitigating Measures

Possible construction mitigation includes:

- Contractors should use properly sized and maintained mufflers, engine intake silencers, and engine enclosures and turn off idle equipment.

- Place construction staging areas expected to be in use for more than a few weeks and stationary equipment as far as possible from sensitive receivers, particularly residences.

- Where feasible, substitute hydraulic or electric models for impact tools such as jackhammers, rock drills, and pavement breakers.

- Where feasible, require back-up alarms on equipment to be ambient-sensing alarms that broadcast a warning sound loud enough to be heard over background noise but without having to use a preset, maximum volume, or use broad band backup alarms instead of typical pure tone alarms.
Possible operation mitigation includes:

- Select quiet HVAC equipment and/or install equipment in an enclosure or in a location shielded from nearby residences.
- Locate loading docks/truck activities in locations shielded from nearby residences.

**Significant Unavoidable Adverse Impacts**

With mitigation, no significant unavoidable adverse impacts are anticipated.

**Environmental Health -- Soil Contamination**

**Potential Impacts**

Remediation of contaminated soils would occur under all alternatives during the construction process. Ecology will be notified about the contamination prior to any construction. A voluntary clean-up plan (VCP) will be developed between the Edmonds School District and Ecology to ensure the contamination is remediated properly.

**Mitigating Measures**

Remediation of contaminated soils would be accomplished during the proposed construction. It is likely that the removal of contaminated soils would correct the ground water contamination. Because the soil is contaminated, it should be handled in accordance with prudent health and safety practices, transported in accordance with applicable Washington State Department of Transportation (WSDOT) regulations, and disposed of at an appropriately licensed disposal facility.

**Significant Unavoidable Adverse Impacts**

With mitigation, no significant unavoidable adverse impacts are anticipated.

**Land Use**

**Potential Impacts**

**Land Use**

Direct on-site impacts include displacement of the Lynnwood Athletic Complex (LAC). Please see the *Parks and Recreation* section of the Draft EIS for a discussion of the LAC.
The Proposed Action would be compatible with commercial uses near or adjacent to most of the site. Indirectly, the Proposed Action would supplement or bolster retail and other commercial activities in the surrounding area. It would reinforce the objectives of the Subregional Center by adding employment and population growth, possibly hasten or stimulate redevelopment in the ACCTA and/or City Center, and contribute to a more robust subregional activity center. Residential use provided as part of the Proposed Action could lessen the short-term demand for residential use in the City Center area. Altogether, indirect and cumulative land use impacts would be positive.

Compatibility would be less for the residential uses adjacent to the north/northwest part of the site. The proposed Costco Warehouse parking lot and fueling facility are adjacent to this area. The greater levels of activity on site, especially in this area, would lead to “proximity” impacts associated with Alternative 2 (e.g., noise, light/glare).

The single-family residence just north of the site and two single-family residences abutting the northwest side of the site would experience the greatest impacts, including impacts from the proposed bypass roadway and the extension of 179th Place SW to 30th Place W planned in conjunction with an approved residential development. Depending upon which bypass roadway configuration is selected, it may be necessary to relocate the driveway that serves the single-family residence north of the site. In these individual cases, the impacts may be considered significant in view of Lynnwood’s goals to protect and enhance single-family neighborhoods, and to ensure retention of single-family housing through protection from conflict with or encroachment of incompatible land uses or activities. Overall impacts on residential use, however, are likely to be minor adverse impacts.

**Relationship to Plans and Policies**

The Proposed Action includes Amendments to the Comprehensive Plan to change the Land Use designation of the site from “Public Facilities” (PF) to “Mixed Use” (MU), and a rezone of the site from “Public and Semi-Public” (P-1) to Commercial-Residential (C-R) to allow development of a mixed-use center.

While additional employment and housing opportunities would be provided, Alternative 2 (Preferred Alternative) would not include an office building component. As a result, fewer employment opportunities would be provided, but increased retail space and additional multi-family units would be provided. This mix of uses would support the purpose of the Subregional Center.

Alternative 2 is generally supportive of GMA’s planning goals except Goal 9 – Open Space and Recreation (see the Parks and Recreation section of the Draft EIS).

The mixed-use component of Alternative 2 would reinforce Lynnwood’s role as a regional growth center under the Puget Sound Regional Council’s Vision 2040. The Costco Warehouse component would be more auto-oriented vs. pedestrian-oriented and would provide less reinforcement.
Alternative 2 would be consistent with Snohomish County’s Countywide Planning Policies that encourage orderly and efficient development patterns with higher density development in urban areas. The mixed use component of Alternative 2 is consistent with the policies of encouraging pedestrian-friendly and transit-compatible development, co-location of jobs and housing, infill and redevelopment of suitable areas.

In general, Alternative 2 supports the Plan Vision, Plan Concept (Land Use), Land Use Description: Mixed Use, Policy Description: Mixed Use, and relevant Goals and Policies of Lynnwood’s Comprehensive Plan, and is consistent with the goals for the Sub-regional Center. An exception is that the Costco Wholesale component of the proposal is not consistent with goals and policies encouraging pedestrian-friendly and transit-supportive development.

The existing level of service in the Parks, Recreation, and Open Space Element of the Comprehensive Plan would need to be revised, and the Parks Facilities Map would need to be amended to remove this site (see the Parks and Recreation section of the Draft EIS).

**Mitigating Measures**

Maintain and or re-establish an effective vegetated buffer in the northwest portion of the site to reduce potential land use incompatibility and proximity impacts to residential uses to the north/northwest of the site.

Comply with the required authorizations, permits, etc. listed in the Fact Sheet.

**Significant Unavoidable Adverse Impacts**

Conversion of a former high school and athletic field site to a more intensive commercial/residential development.

Reduction of the level of service for Parks facilities; see Parks and Recreation section of the Draft EIS.

**Parks and Recreation**

**Potential Impacts**

In addition to the demand for additional park land created by the proposed development, the most significant adverse impact on Parks and Recreation is the loss of the Lynnwood Athletic Complex. While the high school and other school buildings on site were demolished in 2010 and scheduled athletic programs were suspended, impacts are considered as they would occur with the LAC recreation facilities in place.
Loss of Facilities

All facilities at the Lynnwood Athletic Complex (LAC) would be displaced with the result that the City would have fewer recreation facilities within its boundaries and would provide fewer programs, activities, and events. This would be considered a direct adverse impact for and in the City of Lynnwood.

Loss of Activities

*City of Lynnwood:* Opportunities for unscheduled activities at the track, two volleyball courts, children’s play area, and picnic area would be foregone. Although residents may substitute other park and recreation facilities in the City, this could lead to overcrowding at these locations and inconvenience to users. No other substitute volleyball facilities are available in Lynnwood. Also, loss of the track would have the greatest adverse effect on residents who are in closest proximity to the site. Overall, impacts on unscheduled activities would likely be minor to significant depending upon the type of facility in question.

With respect to scheduled activities, the loss of the LAC facilities would adversely affect league and community group programs and activities. Although the City has moved its softball program to the Meadowdale Playfields, the program operates at a reduced number of teams and hours of use compared to activity levels at the LAC. Community group activities at the LAC would be eliminated. The loss of these activities would be extensive and long term. Opportunities to hold the annual 4th of July celebration would be foregone. Impacts on scheduled activities may be considered significant.

*Edmonds Community College:* Edmonds Community College expects that it will continue its women’s and men’s soccer and softball practices and games and intramural sports activities (softball and soccer practices, games, and camps) at the new high school site. The less convenient location is expected to be offset by the beneficial impact of having newer, up-to-date facilities.

Effects on Level of Service

**Effects with Loss of LAC:** For Core Parks, the existing level of service (LOS) standard is 5 acres of Core Parks land per 1,000 population. The current LOS is estimated to be 3.79 acres per 1,000 population. With the Proposed Action, a reduction of 20.4 acres of Core Parks land would occur resulting in an LOS of 3.23 acres per 1,000 population, a reduction of 15 percent. For Community Parks, a subset of Core Parks, the overall LOS would be reduced from 2.62 acres per 1,000 population to 2.06 acres per 1,000 population, a reduction of 21 percent.

**Effects Due to On-Site Population:** Under Alternative 2 for "Core Parks" land, the level of service would decrease to 3.14 acres per 1,000 population, and for "Community Parks" it would decrease to 2.01 acres per 1,000 population. A summary of increased park demand (acres and trail miles) for Alternative 2 based on projected new residents and the City’s adopted level of service for parks is as follows:
- Core Parks (City LOS of 5 acres/1,000 population): 4.5 acres
- Other Parks (City LOS of 5 acres/1,000 population): 4.5 acres
- Trails (City LOS of 0.25 miles/1,000 population): 0.225 miles

**Revenue Impacts**

The estimated revenue that would be foregone with loss of the LAC over the 10-year period from 2009 through the end of the interlocal agreement is estimated to be $1,444,600. Estimated expenditures during this same period would be $986,530.

**Administrative Impacts**

With demolition of the field house/office, the City has lost the ability to house recreation department staff at the site. This would be considered a moderate impact.

**Summary**

Overall, without mitigation, the Proposed Action would result in significant impacts.

**Mitigating Measures**

**Measures Proposed by the Project Sponsor**

The Edmonds School District has built replacement athletic facilities at the new high school site, outside existing City limits. Distance from the Lynnwood community, compounded by circuitous access for many City residents, higher costs to the City, and less than suitable facilities are some of the factors that off-set relocation of activities as an option to mitigate the loss of the LAC.

**Measures Needed to Mitigate Impacts**

The intent of the mitigation shall be to provide for acquisition and development of replacement recreation facilities within the City that provide utility equivalent to the existing complex, the same level of accessibility to Lynnwood residents, the same programs and activities, and the same level of City managerial control.

Individual measures that should be considered include:

- Incorporate open space, a trail for walking and jogging in the design and layout of the proposed development on the existing site, and a connection to the Interurban Trail.
- Provide a monetary or in-kind contribution to the City allowing for the replacement and/or enhancement of substitute parks and recreation resources.
- Develop additional facilities near Alderwood Mall to accommodate casual users.
- Compensate the City for the loss of its capital investment.
- Improve facilities owned by the District within Lynnwood and contract with the City to provide equivalency in terms of utilization and management.

**Significant Unavoidable Adverse Impacts**

The parks and recreation experience as it existed prior to the demolition would be unavoidably affected regardless of what mitigation is prescribed. The extent to which the impact is significant depends upon mitigation. If replacement facilities of equivalent utility, value, and location are provided within the City, the impact would likely be minor to moderate; there would not be significant unavoidable adverse impacts on parks and recreation in this case. If replacement facilities are not of equivalent utility, value, and location, the level of impact would be significant.

**Transportation**

**Overview of the Analysis**

Redevelopment of the former Lynnwood High School site would result in increased levels of trip generation at the site and increased traffic volumes on roads leading to/from the site. The analysis showed that this would result in some redistribution of background traffic to various arterial routes throughout the City, as some existing traffic on the roads near the site would shift to alternative routes in reaction to the increased congestion in the vicinity of the site.

The traffic analysis for this EIS formed the basis for identifying roadway improvements, i.e., mitigation, that would accommodate the increased traffic and its distribution, while at the same time enabling the development alternatives to function adequately. Mitigating measures for each alternative were identified to generally restore the level of service (LOS) and traffic operations in the affected road system to a level equivalent to 2012 baseline conditions. Some unavoidable adverse impacts were also identified for which no mitigation was identified.

Mitigation considered the relationship of the site’s traffic needs to the City of Lynnwood’s long-range plan for an extension of 33rd Avenue W, from 184th Street SW northward around the west and north perimeter of the site, and connecting to Alderwood Mall Parkway as the west extension of Maple Road. This planned but unfunded road is referred to as the “bypass”. Three alternative bypass configurations were tested with Alternative 1 to determine the best configuration of road improvements for access to the
proposed development consistent with the City’s long-range plan for the surrounding area. They are:

**Configuration 1.** Without complete bypass -- a roadway configuration without a complete bypass was evaluated initially.

- Add new signals at 30th Pl W, 1st Access, and 33rd Ave Ext. at 184th St SW
- Add north leg at Nordstrom Dr
- Right-in/right-out (RIRO) at 4th Access

* = existing or proposed signal location

**Configuration 2.** With complete bypass and with a connection to 30th Place W -- the 179th Street SW extension would terminate at 30th Place W.

- Add new signals at 30th Pl W, 1st Access, 3rd Accesses, and 33rd Ave Ext. at 184th St SW
- Add north leg at Nordstrom Dr
- RIRO at 2nd and 4th Accesses
- Alternatives 2-5 have the same configurations.

**Configuration 3.** With complete bypass and with 179th Street SW extended to Alderwood Mall Parkway (AMP) -- 30th Place W would not connect to the bypass.

- Add new signals at AMP, 1st Access, 3rd Accesses, and 33rd Ave W Ext. at 184th St SW
- Add north leg at Nordstrom Dr
- RIRO at 2nd and 4th Accesses
An analysis was carried out to determine what the impacts would be for Configuration 1 without the complete bypass (this analysis is documented in the *Transportation* section of the Draft EIS and is not summarized herein). It was determined that without the complete bypass, off-site impacts on nearby Alderwood Mall Parkway and on Maple Road would be quite large, and additional mitigation would involve environmentally difficult road widening that also has a high potential for impacting existing businesses and structures located along the street. This configuration was determined to be impractical based upon the scope of likely impacts and cost of construction. Therefore, two alternative configurations for a complete bypass, as shown above, were analyzed that would reduce or avoid these off-site impacts. The latter two versions differ in the manner of routing trips between nearby 179th Place SW and Alderwood Mall Parkway, with significant revisions to the operation and configuration of the key intersection at Alderwood Mall Parkway and Maple Road. All development alternatives include the complete bypass.

All alternatives were evaluated and compared to the Alternative 1. Each has less net trip generation than the Alternative 1 (Alternative 2 has higher gross trip generation); however, the required traffic mitigation is nearly the same as for the Alternative 1 in each case. The complete bypass would be required for each.

**Potential Impacts**

**Street System**

All alternatives have been assumed to add a new network of streets within the site and new connections to adjacent arterials, generate additional traffic on most roads in the study area, and include one of the two configurations of the bypass route. The bypass, which would be built as a 3-lane facility as part of the proposal, is an extension of 33rd Avenue W that is located on the former Lynnwood High School site. The extension would proceed from 184th Street SW northward along the site’s west perimeter as 33rd Avenue W (which is coincident with the inferred location of 31st Place W), bend around the site’s northwest corner, and proceed northeastward to Alderwood Mall Parkway as a west extension of Maple Road. Existing 30th Place W turns into alignment with Maple Road as it approaches Alderwood Mall Parkway. This part of 30th Place W would be truncated and realigned to intersect with the bypass at a new intersection approximately 200 feet west of Alderwood Mall Parkway. The 2012 analysis identifies a current need for two through lanes on the bypass plus left-turn provisions, which may be turn pockets at intersections or a continuous two-way left-turn lane. The bypass is evaluated as a component of the proposed development’s access plan and as an element of the development’s off-site mitigation. It would draw significant levels of background traffic into the bypass route and away from some other off-site roads. The road is designed so that the City may expand it to a 5-lane cross section, in the future, as required to address regional traffic growth.
The City’s long-range transportation plan identifies an alternative (north-south) link (and new intersection connection) between 179th Street SW (extended) and the new three-lane bypass roadway. This intersection would be located further to the west than the intersection of 30th Place W with the bypass roadway as evaluated in this EIS. The future 179th Street SW link and intersection as well as widening the bypass roadway to five lanes would be funded by a future LID (as one possible tool) that would require the property owner’s participation. The LID would likely have a large, but as yet unspecified, benefit area. It is anticipated that the subject site and a number of others would be included in the LID. As a requirement of this development proposal, it is anticipated that the project proponents will be required to record a “no protest agreement” with regards to the future LID (s) as described.

**Bypass With 30th Place Retained:** The terminus of existing 30th Place W would be shifted to a ‘tee’ intersection with the bypass route about 200 feet west of Alderwood Mall Parkway. As a result, intersection improvements at Maple Road and Alderwood Mall Parkway would be needed as part of the bypass construction. The intersection improvements would include adding an additional lane on Maple Road between 30th Place W and Ash Way, and re-channelizing the eastbound and westbound approaches as one left-turn lane and two through and right-turn shared lanes. In addition, the southbound approach would need a separate right-turn pocket.

**Bypass With 179th Place Extended to Alderwood Mall Parkway:** The extension of 179th Place SW to 30th Place W would be further extended eastward from 30th Place W to connect with Alderwood Mall Parkway. 30th Place W would be removed from the road system south of 179th Place SW. The existing private driveway would remain. This road configuration would not require widening of Maple Road east of Alderwood Mall Parkway.

**Costco fueling station:** Queues on all days of the week in the PM peak hour should be six vehicles or less, which is less than the maximum queue storage capacity. Additional discussion of the operational and air quality characteristics and impacts of the fueling station are provided under Air Quality and in Chapter 3 of this Final EIS.

**Site Access and Circulation**

On-site streets, which would be private streets under all of the alternatives, are described below. Within the site, each of these would carry modest volumes requiring only one lane each way, except that a left-turn pocket is needed at most site access intersections at the perimeter of the site. One east-west road is proposed.

The intersection of the ‘1st Access’ with 33rd Avenue W Extension would be in all cases a “tee” intersection. Left-turn pockets are provided in the proposed site plan, and signalization is identified as a mitigation need.

A new intersection would be formed where 33rd Avenue W Extension connects with 184th Street SW. This location is identified in site plans as signalized and channelized
for left turns. North of this intersection, a two-lane section suffices due to minimal left-turn activity into the site from the north at the ‘2nd Access’ and the ‘1st Access’.

The existing intersection giving access to Alderwood Mall on 184th Street SW, located west of the ‘4th Access’, would be modified to include a new fourth leg on the north side, giving access to the site. Signal controls would be modified, and the site plan indicates two lanes in and two lanes out. Analysis indicates that two southbound lanes are desirable to split left turns from right turns, but the inbound direction does not require two lanes to serve the smaller inbound volume.

A new street intersection is proposed on 184th Street SW on the site’s east boundary, as the ‘4th Access’. This location would not be signalized and would provide only right-turn movements in and out, to avoid conflict with the existing all-turns access driveway to the retail property east of the site and the left-turn traffic to Alderwood Mall west of the ‘4th Access’.

**182nd Street SW Connection:** The existing site access connection to existing 182nd Street SW would experience a large increase in use, which in turn would affect the un-signalized intersection at 182nd Street SW and Alderwood Mall Parkway.

**Traffic Volumes in 2012 (Bypass With 30th Place Retained)**

**Alternative 2 Trip Generation in PM Peak Hour:**

- 3,177 gross trips
- 1,223 net trips

**Trip Distribution** (see Figure 3-21 in the Transportation section of the Draft EIS):

The largest proportion of site-generated travel would use the site’s proposed ‘1st Access’ where it connects to the bypass roadway. The next largest volumes would use the access points on 184th Street SW (the connection to the existing north entrance to Alderwood Mall, and ‘4th Access’ near the site’s east boundary). Smaller volumes would originate at the '2nd Access', '3rd Access', and at existing 182nd Street SW.

Off-site, the largest volume is oriented to/from areas north and east of the site, via Alderwood Mall Parkway and Maple Road. At the west side of the site, the majority of site trips would follow existing 33rd Avenue W southward to reach various destinations, including the City Center subarea and western areas of Lynnwood and beyond. Travel added to Alderwood Mall Parkway south of 184th Street would be oriented to areas east of Lynnwood via 196th Street SW or via Locust Way, and south of Lynnwood via I-5.

Compared to the baseline volumes for 2012, Alternative 2 would add the following percentage volumes at selected locations (see Figure 3-22 in the Transportation section of the Draft EIS):

- 8 percent to Alderwood Mall Parkway north of Maple Road
- 3 percent to Alderwood Mall Parkway south of 184th Street
- 72 percent to 184th Street west of the site
Traffic Safety

Accident totals would typically increase as traffic volumes increase; however, the overall accident rate per vehicle trip would not change unless congestion is significantly increased. Traffic mitigation has been identified for each alternative so that overall congestion levels would not increase for the study area as a whole, and the area-wide accident rate is not expected to change. Therefore, although an increase in total future accidents is expected, it would not be a significant impact of any of the alternatives. Without mitigation, the unsignalized intersection at 182nd Street SW and Alderwood Mall Parkway would be vulnerable to increased accident potential.

Traffic Impacts with 30th Place Retained

The traffic impacts on the affected street system are summarized below in terms of Level of Service changes at major intersections, and total travel delay in the study area and citywide. This analysis includes the complete bypass but does not include any off-site mitigation. As a result of including the complete bypass, Alternative 2 would have slightly higher total delay than the 2012 baseline condition but, overall, it would not violate the City’s LOS standard. The proposed mitigation should reduce the citywide delay equal to or less than the 2012 baseline condition.

Intersection Performance (see Table 3-19 in the Transportation section): No. of intersections with:

- LOS B – 7
- LOS C – 4
- LOS D – 4
- LOS E – 1
- LOS F – 5

Delay: 578 vehicle-hours of delay per PM peak hour in the study area; in the remainder of the citywide system, the delay would be 1,830 hours.

Citywide net delay: increase of 33 hours

Mitigating Measures

Measures Proposed by Proponent and Required by Regulation

Traffic mitigating measures are summarized for Alternatives 1 through 5 that would restore queue ratios and delay measures to the levels predicted with the baseline case before site redevelopment. Different levels of mitigation are required depending on the configuration of the bypass that is chosen. The following table lists the mitigation configuration requirements for Alternative 1 with and without the bypass configuration options, and for Alternatives 2 through 5 with the bypass configuration options, accounting for all facilities around the perimeter of the site. The site-related locations, which are
## Mitigation Requirements for Alternatives 1 through 5

<table>
<thead>
<tr>
<th>Location</th>
<th>Without Bypass</th>
<th>With Bypass and 179th Street Extended to AMP</th>
<th>Alternatives (with Bypass and 30th Place W Retained)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roadway Segments</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>#33rd Ave W Extension, 184th Street SW to ‘2nd Access’</td>
<td>2 lanes, plus two-way left-turn lane in the median</td>
<td>←same</td>
<td>←same</td>
</tr>
<tr>
<td>#33rd Ave W Extension, ‘2nd Access’ to ‘3rd Access’</td>
<td>Not included</td>
<td>2 lanes, plus two-way left-turn lane in the median</td>
<td>←same</td>
</tr>
<tr>
<td>#Maple Road Extension, ‘3rd Access’ to 30th Pl. W</td>
<td>2 lanes, plus two-way left-turn lane in the median</td>
<td>←same</td>
<td>←same</td>
</tr>
<tr>
<td>#Maple Road Extension, 30th Pl. W to Alderwood Mall Pkwy</td>
<td>5 lanes†</td>
<td>4 lanes</td>
<td>6 lanes</td>
</tr>
<tr>
<td>Maple Road, Alderwood Mall Pkwy to Ash Way</td>
<td>Add WB second LT lane</td>
<td>Keep existing 4 lanes</td>
<td>Add WB thru lane</td>
</tr>
<tr>
<td>179th St. SW Ext’n, 30th Pl. W to Alderwood Mall Pkwy</td>
<td>Not included</td>
<td>3 lanes</td>
<td>Not included</td>
</tr>
<tr>
<td>196th Street Corridor, 36th Ave W to Alderwood Mall Pkwy</td>
<td>Corridor signal timing adjustment†</td>
<td>←same</td>
<td>←same</td>
</tr>
<tr>
<td>188th Street SW, 33rd Ave W to 36th Ave W</td>
<td>Corridor signal timing adjustment†</td>
<td>←same</td>
<td>←same</td>
</tr>
<tr>
<td>Intersections</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Private Access Driveway, west of 30th Pl. W</td>
<td>Relocate driveway</td>
<td>Retain driveway in present location</td>
<td>Relocate driveway</td>
</tr>
<tr>
<td>#33rd Ave W Extension &amp; 184th Street. SW</td>
<td>New signalized intersection; 3 lanes x 5 lanes</td>
<td>←same</td>
<td>←same</td>
</tr>
<tr>
<td>#33rd Ave W Extension &amp; ‘1st Access’</td>
<td>Signalized, with LT storage on ‘1st Access’</td>
<td>←same</td>
<td>←same</td>
</tr>
</tbody>
</table>

Planned Action EIS
Lynnwood Crossing
<table>
<thead>
<tr>
<th>Location</th>
<th>Without Bypass</th>
<th>With Bypass and 179th Street Extended to AMP</th>
<th>Alternatives (with Bypass and 30th Place W Retained)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Alternative 1</td>
<td>Alternative 1</td>
<td>1</td>
</tr>
<tr>
<td>#33rd Ave W Extension &amp; ’2nd Access’</td>
<td>Not an intersection</td>
<td>Un-signalized, Right-in/right-out 3 lanes x 2 lanes</td>
<td>⇜same</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td></td>
<td></td>
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<td>⇜same</td>
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<td></td>
<td></td>
<td></td>
<td>3</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>⇜same</td>
</tr>
<tr>
<td>#3’rd Access’ &amp; Maple Road Extension</td>
<td>Not an intersection</td>
<td>Signalized, 3 lanes x 2 lanes</td>
<td>⇜same</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4</td>
</tr>
<tr>
<td></td>
<td></td>
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<td>⇜same</td>
</tr>
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<td></td>
<td></td>
<td>5</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>⇜same</td>
</tr>
<tr>
<td>#30th Pl. W &amp; Maple Road Extension</td>
<td>Reconstruct as 3 lane x 5 lane signal coordinated with adjacent intersection(s)</td>
<td>Not an intersection</td>
<td>3 lane x 6 lane signal coordinated with adjacent intersection(s)</td>
</tr>
<tr>
<td></td>
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<td>4</td>
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<tr>
<td></td>
<td></td>
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<td>⇜same</td>
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<td></td>
<td></td>
<td></td>
<td>⇜same</td>
</tr>
<tr>
<td>182nd Street SW &amp; Alderwood Mall Pkwy</td>
<td>Prohibit left turns EB-&gt;NB, and no signal</td>
<td>⇜same</td>
<td>⇜same</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4</td>
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<td>5</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>⇜same</td>
</tr>
<tr>
<td>’4th Access’ &amp; 184th Street SW</td>
<td>Right-in/right-out</td>
<td>⇜same</td>
<td>⇜same</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4</td>
</tr>
<tr>
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<td>5</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>⇜same</td>
</tr>
<tr>
<td>‘Alderwood Mall Access’ &amp; 184th Street SW</td>
<td>Signal modifications for north leg; 2 outbound lanes SB; 1 entering lane NB is OK on north leg</td>
<td>⇜same</td>
<td>⇜same</td>
</tr>
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<td></td>
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<td>4</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>⇜same</td>
</tr>
<tr>
<td>#Maple Road &amp; Alderwood Mall Pkwy</td>
<td>Add EB, WB double LT lanes; Add SB right-turn lane; Add WB exiting lane</td>
<td>Add EB thru lane and SB right-turn lane; No WB exiting lane added</td>
<td>Add EB, WB thru lane and EB second left-turn; Add SB right-turn lane; add WB exiting lane</td>
</tr>
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<td>4</td>
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<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>⇜same</td>
</tr>
<tr>
<td>179th Extension &amp; 30th Pl.</td>
<td>No change from Planned “Tee” Int’n, stem to west (2x2, No signal)</td>
<td>Convert to “Tee” with stem to north (3x3, No signal)</td>
<td>No change from Planned “Tee” Int’n, stem to west (2x2, No signal)</td>
</tr>
<tr>
<td></td>
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<td>4</td>
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<td></td>
<td></td>
<td></td>
<td>⇜same</td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>⇜same</td>
</tr>
<tr>
<td>Maple Road &amp; Ash Way</td>
<td>Prohibit left turns, or signalize, or close the intersection</td>
<td>⇜same</td>
<td>⇜same</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4</td>
</tr>
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<td></td>
<td>5</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>⇜same</td>
</tr>
<tr>
<td>#Alderwood Mall Access Intersection on 33rd Avenue W, south of 184th Street SW</td>
<td>No Action Required</td>
<td>Tolerate queues within Alderwood Mall site, or prohibit westbound left turns in peak hours</td>
<td>⇜same</td>
</tr>
</tbody>
</table>

Planned Action EIS
Lynnwood Crossing
<table>
<thead>
<tr>
<th>Location</th>
<th>Without Bypass</th>
<th>With Bypass and 179th Street Extended to AMP</th>
<th>Alternatives (with Bypass and 30th Place W Retained)</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Alternative 1</td>
<td>Alternative 1</td>
<td>1</td>
</tr>
<tr>
<td>Net Citywide delay (vehicle-hours)</td>
<td>96</td>
<td>91</td>
<td>35</td>
</tr>
<tr>
<td>Impact Fees by 2012 (million dollars)</td>
<td>$2.7</td>
<td>$2.7</td>
<td>$2.7</td>
</tr>
</tbody>
</table>

1 Proponent’s site plan shows a lower level of improvement than the requirements listed here.
2 City of Lynnwood prefers un-signalized for safety reasons (see text).
# Included in transportation impact fee project list
* Corridor signal timing adjustment: Assumes the City will periodically monitor and systematically adjust signal timings for the signalized intersection citywide.
shown in **bold type**, require mitigations similar to those proposed by the Proponent; that is, completion of the three-lane bypass and provision of right-of-way to accommodate the City’s future five-lane configuration. At all off-site perimeter locations, which are shown in regular type, most improvements are driven by the requirement to manage queue lengths at congested intersections to avoid queues spilling back to upstream intersections and resulting in significantly greater delays in the citywide road network (pursuant to Comprehensive Plan Policy T-21.4. The perimeter locations are integral parts of site access even though not contiguous with the site. In addition, mitigation requirements for the 'With Bypass and 30th Place W Retained' configuration are listed for the other four alternatives. All three portions of the Maple Road extension west of Alderwood Mall Parkway would require a greater level of improvement than the Proponent’s site plan indicates in order to achieve acceptable traffic operation at the year of opening. All alternatives include construction of a 3-lane complete bypass around the site connecting 33rd Avenue West to Maple Road. The Proponent also would provide right-of-way for future expansion of the bypass to five lanes.

**Additional Mitigation Needed to Reduce Impacts**

Monitor potential congestion at the unsignalized access intersection to Alderwood Mall on 33rd Avenue W south of 184th Street SW, and consider traffic revision options. If the left-turn queues that develop in peak hours can be tolerated within the Alderwood Mall site, then no action is necessary. If queues become disruptive to circulation with the mall site, or if accident experience arises due to left-turn conflicts, then the outbound left turns at this location should be prohibited, either in peak hours only or potentially at all times.

Construction will require export and import of soil during site preparation resulting in possibly high truck traffic. The amount of soils import and export will depend on the quality and condition of the existing soil materials as the project enters the construction phase. The project could require import of up to approximately 50,000 cubic yards of material and export of up to approximately 120,000 cy. Truck traffic associated with this activity along with other construction-related traffic is not expected to degrade operations of study area intersections during off-peak hours. See Memorandum prepared by Heffron Transportation addressing construction traffic in Chapter 2 Additional Information.

The above conclusion is based on the expectation that there will be no truck traffic during peak hours. As noted in the Memorandum, a construction transportation management plan would be prepared per City of Lynnwood requirements. In addition, mitigation the City will consider requiring of the applicant includes:

- Identify truck routes and hours of operation.
- Assess and document street conditions for truck routes before and after grading has taken place.
• Assume responsibility for street repairs resulting from truck traffic.

• Implement dust and mud control measures such as site watering and wheel washing of trucks exiting the site.

Other traffic control measures will be implemented through a traffic control plan.

**Transportation Impact Fees**

The City adopted a transportation impact fee program that requires that new development in the City that creates additional demand for public transportation facilities must pay for a proportionate share of the cost (impact fees) of the new facilities to serve the growth. The impact fees are determined according to the fee structure; estimated impact fees for the alternatives are shown at the bottom of the above table.

**Significant Unavoidable Adverse Impacts**

Mitigation would not eliminate all off-site queue storage issues, but in the unresolved cases there is no feasible way to further upgrade the affected roads. The same locations would be similarly affected by all versions of the bypass. A further increase in queue lengths would result at these locations with existing queue storage deficiencies, because no practical mitigation exists:

- 196th Street SW and Alderwood Mall Parkway
- 196th Street SW and 30th Place W
- 196th Street SW and Poplar Way W

At the intersection of Beech Road SW and Alderwood Mall Parkway, a small increase in queue lengths for left-turn movements would result because signalization is not warrant-ed and the available storage length is adequate to absorb the increase.

At the intersection of the SR 525 Southbound off-ramp and Alderwood Mall Parkway, the intersection demand in all cases is over capacity, and signalization may be the most likely resolution. Signal Warrant 3 is satisfied for the 2012 baseline condition.

Right-of-way acquisition on Maple Road and on Alderwood Mall Parkway would affect adjacent properties, including a portion of the project site in the southwest quadrant, existing wetlands in the southeast and northwest quadrants, and/or the existing gas station in the northeast quadrant of their intersection.

Right-of-way acquisition on Maple Road and on Alderwood Mall Parkway would, if necessary, affect adjacent properties, including a portion of the project site in the southwest quadrant, existing wetlands in the southeast and northwest quadrants, and/or the existing gas station in the northeast quadrant of their intersection.
It should be noted that the recommended mitigation for the bypass configuration with 30th Place retained would result in the least citywide delay compared to the scenario without the bypass and the scenario with bypass and 179th Extension to Alderwood Mall Parkway. The scenario with the bypass and 30th Place W retained is the preferable scenario; Alternative 2 was evaluated with the bypass and 30th Place W retained.

**Water and Sewer**

**Potential Impacts**

**Water:**

*Water demand* would be approximately 295,000 gallons per day (gpd), which is approximately 257,000 gpd higher than the average water demand of the former high school. This level of consumptive use would not cause the City to exceed its contracted 10-mgd limit.

Fire flow requirements are estimated to be as much as 8,500 gallons per minute (gpm) for the largest residential facility. Existing available fire flow is 3,500 gpm and planned improvements would increase it to at least 6,000 gpm, possibly higher depending on construction techniques. Additional improvements, potentially including a booster station, would be needed to go beyond 6,000 gpm.

*Water quality* issues could arise if water service to the property is not designed to minimize stagnation caused by dead ends.

The eight-story mixed-use building would present potential issues with *water service pressure*, which would require an analysis of pressure adequacy prior to issuing a building permit.

**Sewer:**

Alternative 2 would have a peak-hour wastewater flow rate of approximately 470 gpm. Other developments would contribute another 87 gpm of peak-hour flow, bringing the total peak-hour flow to Lift Station No. 4 to 557 gpm. Alternative 2 would exceed the existing capacity of the lift station (300 gpm) by 257 gpm.

Alternative 2 would place additional demands on Lift Stations No. 4 and No. 8 that exceed their capacities. Both would need to be upgraded to serve Alternative 2 and other planned developments in the sewer basin.

Flows from Alternative 2 will impact three Lift Station 10 design alternatives.
Mitigating Measures

A new water line would be needed to increase fire flow capacity.

Capacity upgrades to Lift Station Nos. 4 and 8 would be required. For Lift Station No. 10 the options are upgrading Lift Station 10’s capacity, or building a new lift station at either Scriber Lake or 188th Street SW and Highway 99 that would allow flows to be diverted from Lift Station 10. The cost of capacity upgrades would be apportioned proportional to benefits.

Significant Unavoidable Adverse Impacts

There would be no significant unavoidable adverse impacts to the City’s water and sewer system infrastructure if the improvements described in this analysis are made.

Light and Glare

Potential Impacts

A substantial amount of new light will be generated as a result of the installation of lighting fixtures at many locations on the site. Also, there will be an increase in vehicular lights noticeable at surrounding properties. These sources will result in the potential intrusion of light into homes in the area and night-time glare that illuminates the sky. A detailed lighting plan that will be included as part of the submittal for the Design Review Process will be designed so that no measureable foot-candles would be broadcast onto the adjoining properties. The plan likely will include the following lighting features:

- Lighting would be installed along the internal roadways, parking lots, at building entrances, and at the fueling facility canopy.

- Street lighting for the 33rd Avenue W extension would most likely be located more than 80 feet from the west property line and approximately 160 feet from residences. Also, there would be an approximate 45-foot elevation difference between the site and residences.

- Roadway and parking lot lighting that is not part of the new 33rd Avenue W extension would be set back a minimum of 200 feet from the west property line. It would likely include cut off luminaires on poles using metal halide light sources with a maximum height of 30 feet; initial light levels would be in the 2- to 5-foot-candle range.

- Lighting proposed for the mixed-use portion of the site includes pedestrian, security, and plaza lighting. Pedestrian lighting and pedestrian-scale lighting in plaza areas would not exceed 16 feet in height. Some lighting would be attached to buildings and structured parking as needed.
Lighting associated with the Costco Wholesale fueling facility would be semi-recessed into the canopy and provide lighting both during operating hours and a lower level of security lighting after hours.

Costco Wholesale lighting for the fueling facility canopy lighting, building mounted lighting, and parking lot lighting would be approximately 200 feet from the north property line based on preliminary design.

All Costco Wholesale signs will be illuminated by light fixtures directed at the signs, which will reduce light spillage and minimize glare. No lighted freestanding signs or internally illuminated building signs are proposed.

Lamp sizes are anticipated to vary from 250 to 1,000 watts.

Luminaires will be equipped with full cut-off fixtures and shielding/reflectors to shield lighting from residential areas to the west and north that are located above the horizontal surface.

Proposed materials for buildings in the mixed-use portion of the development will include wood, brick, concrete masonry units, concrete, metal, composite panels, and glass. Metal finish will be brushed, colored, or muted to minimize reflectance and glare; no mirrored glass will be used.

Costco Wholesale intends to use multiple materials with varying colors, textures and patterns including finished concrete, masonry units, structural steel, metal siding panels, and stucco type finishes. Earth tone and muted colors would be used to minimize reflection and glare.

Impacts are expected to be minor.

**Mitigating Measures**

Lighting design will comply with the Illuminating Engineering Society of North America’s *Recommended Practices* and *Design Guidelines* and with the City’s Project Design Review process. Specific measures identified at this time include:

- Shielding of lights, the directing of light toward the ground, internal lighting of signs, and automatic lighting cut-offs in areas of intermittent use.
- Costco Wholesale proposes use of a remote energy management controller to monitor and control lighting from a central location, or by onsite controls.
- Use of metal halide lamps to provide a color-corrected white light and a higher level of perceived brightness with less energy.
• All site lighting will use either metal halide or low-pressure sodium lights with cut-off fixtures, and luminaires will be fully shielded.

• Canopy lighting for the proposed fueling facility will be fully shielded.

**Significant Unavoidable Adverse Impacts**

No significant unavoidable adverse earth impacts are expected to occur. There will be “night sky” illumination effects even with mitigating measures.
II. CHAPTER 2

Additional Information

This section provides additional information about the proposed action that was developed after the Draft EIS was issued.

A. Import and Export of Soil

The amount of soil import and export will depend on the quality and condition of the existing soil materials as the project enters the construction phase. The project could require importing up to approximately 50,000 cubic yards (cy) of material and export of up to approximately 120,000 cy. Truck traffic associated with this activity along with other construction-related traffic is not expected to degrade operations of study area intersections during off-peak hours. See the attached Technical Memorandum “Potential Construction Traffic Impacts” dated December 14, 2011, prepared by Heffron Transportation addressing construction traffic on the following pages.

The above conclusion is based on the expectation that there will be no truck traffic during peak hours. As noted in the Memorandum, a construction transportation management plan would be prepared per City of Lynnwood requirements. Additional mitigation the City will consider requiring of the applicant includes:

- truck routes and hours of operation.
- Assess and document street conditions for truck routes before and after grading has taken place.
- Assume responsibility for street repairs resulting from truck traffic.
- Implement dust and mud control measures such as site watering and wheel washing of trucks exiting the site.

Other traffic control measures will be implemented through a traffic control plan.

B. Tree Removal

A tree survey has been conducted. There are approximately 540 significant trees (as defined by LMC 17.15.080) currently on the site. Based on the current level of design, it appears that 359 of them would be removed for development of the site. One hundred and seventy-two (172) would be removed for the proposed roadway, and 19 for the detention pond. The rest are located throughout the site. A calculation in accordance with LMC 17.15.090(A) based on the diameters of the various significant trees to be removed resulted in a replacement number of approximately 564 trees. An additional approximately 522 non-significant trees (as defined by 17.15.080(B)) would be replaced per LMC 17.15.140(B) at one tree per every ten removed, for a total of 52 trees. The exact number of trees to be removed and the quantity required to be replaced will be
determined when the application for a tree removal permit is applied for in accordance with LMC 17.15.100. The replacement trees would be a minimum of two and one-half inches in diameter for deciduous trees and for evergreen trees a minimum of eight feet high in accordance with LMC 17.15.120(C)(2). If it is determined there is not adequate space on the site for the approximately 616 trees to be replaced, the Project Sponsor has the option of paying a tree fee as outlined in LMC 17.15.120(D).

Some of the significant trees that may be lost play a role in creating a visual buffer between the site and homes located at the crest of the hill. Mitigating measures that will be considered include strategically located replanting and, if deemed necessary, other visual barriers such as a screen fence.

**C. Maple Road/Alderwood Mall Parkway**

The proponent’s consultant prepared a Draft Technical Memorandum, "Mitigation Review at Maple Road/Alderwood Mall Parkway, dated November 29, 2011 (provided at the end of this section). The Technical Memorandum addresses a mitigation requirement in the Draft EIS for widening Maple Road between Alderwood Mall Parkway and Ash Way (on the east side of Alderwood Mall Parkway), and analyzes an alternative mitigation option to avoid the need for widening of that street segment.

More specifically, the Technical Memorandum analyzes the results of a level of service analysis wherein the existing four-lane channelization of Maple Road east of Alderwood Mall Parkway is retained, and the east-west flow is coordinated with optimized signal cycle lengths, offsets, phasing, and split timings ("With Development and Alternative Mitigation"). The Technical Memorandum concludes that this alternative mitigation option would retain a Level of Service D at the intersection. Higher delays would result when compared to the mitigation for development identified in the Draft EIS, although the delays would be less than the "Baseline Condition" without the project.

In reviewing the Technical Memorandum, the elimination of the additional leg on the east leg of the intersection of Maple Road and Alderwood Mall Parkway in conjunction with the proposed alternative mitigation results in the intersection operating at LOS D with a delay of 54.3 seconds and a V.C. of 0.99.

However, the main issue is that the westbound queues would be significantly long (about 800 feet). This creates a significant issue for traffic to make turns at Ash Way. The additional lane on the westbound approach is intended to mitigate for this by minimizing the long queues. Therefore, no change in this mitigation requirement for an additional lane is acknowledged in the Final EIS.
This memorandum describes the potential construction-related impacts for the proposed Lynnwood Crossing Site Redevelopment Alternatives.

1. Construction Traffic Impacts

Construction of the Lynnwood Crossing Site Redevelopment is expected to require earthwork that could involve cut and fill with balancing on site. Depending on the quality and condition of the soil materials, the project could require import of up to approximately 50,000 cubic yards (cy) of material and export of up to 120,000 cy of material. Of these amounts, the largest potential volume of earthwork (import of about 40,000 cy and export of about 90,000 cy) is anticipated during the Phase 1 site work grading for the Costco Warehouse and the bypass road that would be constructed around the north and west sides of the site. It is estimated that the Phase 2 grading effort for the remainder of the site could involve import of about 10,000 cy and export of about 30,000 cy of materials.

The earthwork material is expected to be moved using trucks that can carry about 22 cy each (dump and pup configuration) and would result in about 5,910 truckloads during Phase 1 and about 1,820 truckloads during Phase 2. The Phase 1 earthwork is expected to occur over approximately six months (approximately 132 working days); Phase 2 earthwork is expected to occur for between one and two months (estimated at 33 working days). Based on these assumptions, the Phase 1 earthwork would require approximately 45 truckloads per day and Phase 2 earthwork would require about 55 truckloads per day. Each truckload would generate two trips (one inbound and one outbound) and would most likely occur during daytime hours (8:00 A.M. through 4:00 P.M.). Most construction transportation is stopped by 4:00 P.M. to avoid unnecessary delay to truck drivers from peak hour congestion. Assuming transportation occurs over eight hours each workday, the earthwork for Phase 1 would generate an average of 10 to 12 truck trips per hour (5 to 6 inbound, 5 to 6 outbound). During Phase 2, the earthwork would generate an average of 12 to 14 truck trips per hour (6 to 7 inbound, 6 to 7 outbound).

Building materials (including concrete for foundations, asphalt for parking facilities, structural elements, sub-base aggregates, backfill gravel, etc.) would be transported to the site regularly throughout the construction period. The number of deliveries each day would vary depending on the phase of construction and construction elements involved.

1 Estimates provided by BCRA Engineering, December 7, 2011.
Construction of the project would also require employees and equipment that would generate traffic to and from the site. Construction at the site would likely occur Monday through Friday. It is anticipated that construction workers would arrive at the construction site before the AM peak traffic period on local area streets and depart the site prior to the PM peak period; construction work shifts typically begin by 7:00 A.M. and end by 4:00 P.M., while the corresponding peak traffic periods typically occur slightly later. The number of workers at the project site at any one time would vary depending upon the nature and construction phase of the project. Based on past experience with construction of other major developments, the number of construction employees on site is estimated to range from a low of 20 workers (during early site work) to a peak of about 175 workers (during periods with many trades working within the buildings). The presence of a temporary construction work force would also generate demand for parking spaces around the project site. It is expected that construction employees would be able to park in on-site staging areas or in new parking lots constructed on site for the project as they become available.

The proposed project would likely generate a noticeable amount of construction-related traffic on surrounding roadways. However, construction traffic volumes would be far less than the volumes evaluated for full-build of the completed redevelopment alternatives. Construction worker vehicles and trucks carrying materials to and from the site would likely use 184th Street SW. However, some construction-related traffic could also use Alderwood Mall Boulevard and Maple Road or 182nd Street NW to access the site. The truck traffic is not expected to degrade operations of study area intersections during off-peak hours.

A construction transportation management plan (CTMP) addressing site access, traffic control, hauling routes, construction employee parking, and pedestrian and bicycle control in the area would be prepared per City of Lynnwood requirements. In addition, the City of Lynnwood may require mitigation for construction vehicle damage to roadways in the site vicinity.

TSM/tsm

Lynnwood Crossing Construction Traffic Analysis - FINAL.docx
Chapter 3 of the Lynnwood Crossing Planned Action Draft EIS presents Table 3-18 Mitigation Requirements for Alternative 1—Off-site, which indicates that Maple Road would require widening between Alderwood Mall Parkway and Ash Way in order to accommodate the recommended project mitigation. This mitigation was part of a larger menu of improvements recommended for the intersection to address added traffic from the development and changes in traffic patterns resulting from the City’s planned Bypass Roadway (to be constructed as mitigation by the developer).

The other measures recommended as mitigation for the intersection include the addition of a southbound-to-westbound right-turn lane to Alderwood Mall Parkway and widening of the west leg to provide a total of six lanes (two westbound lanes approaching 30th Place W, two eastbound-to-northbound left-turn lanes, an eastbound through lane, and an eastbound shared through-right lane). The DEIS section also states that the recommended widening of Maple Road east of Alderwood Mall Parkway could require new right-of-way that would “potentially encroach on storm drainage swales, gas station property, and/or the project site.” Due to these potential constraints and to provide an alternative option, Heffron Transportation has reviewed the operational analyses for Alternative 2 to identify measures that would minimize or eliminate the need for additional right-of-way on Maple Road east of Alderwood Mall Parkway.

1. Alternative Mitigation Option

The Synchro 7.0 traffic operations model developed for Alternative 2 by the City’s transportation consultant (David Evans & Associates [DEA]) was used to test alternative mitigation options for the Alderwood Mall Parkway/Maple Road intersection. The traffic volume forecasts in the model were confirmed to match those published for the Alternative 2 with-project development scenario presented in the DEIS.

For the alternative mitigation option, the channelization on the east leg was assumed to remain as a four-lane section with a westbound-to-southbound left-turn lane, a westbound shared through-right lane and two eastbound lanes. The west leg was assumed to remain as recommended by DEA with six lanes—two westbound and four eastbound. The north leg was assumed to remain as recommended by DEA with a new southbound-to-westbound right-turn lane. However, a new right-turn overlap signal phase was added to serve right-turning traffic at the same time as the eastbound-to-northbound left-turn phase. The south leg was assumed to remain unchanged from existing conditions; however, a similar right-turn overlap signal phase was added to serve the northbound-to-eastbound right turns. A conceptual design sketch of the alternative mitigation channelization is attached.

As noted in the DEIS, the close spacing of three signalized intersections along the Maple Road Extension (Bypass Roadway)—at Alderwood Mall Parkway, 30th Place W, and the new Costco access

heffron transportation inc

- 1 -
driveway—would necessitate coordination of the signals for east-west flow. Since the new Bypass Roadway would also change travel patterns in the area, the signal phasing and cycle lengths would require re-optimization. Therefore, the Synchro model was re-optimized to reflect coordinated east-west flow with optimized signal cycle lengths, offsets, phasing, and split timings. Table 1 presents the results of the level of service (LOS) analyses, retaining the existing four-lane channelization of Maple Road east of Alderwood Mall Parkway and adding the modifications described above (the original results reported in the DEIS are presented for comparison). The level of service calculation sheets are attached.

As shown, the alternative mitigation option is expected to maintain LOS D operations at the Alderwood Mall Parkway intersection. Although the delays at the Maple Road/Alderwood Mall Parkway intersection would be higher than the mitigation scenario presented in the DEIS, the LOS and delay with the alternative mitigation option would meet the City’s adopted LOS standard and improve operations over the baseline condition without the project (reported in the DEIS as LOS E with average delay of 60.4 seconds). Therefore, the alternative mitigation option would meet the requirements of SEPA. Delays at the other two intersections would also be slightly higher, but would correspond to operating conditions of LOS C or better, which is acceptable to the City.

Table 1. Intersection Level of Service Summary — With Alternative 2 and Bypass

<table>
<thead>
<tr>
<th>Int. No.</th>
<th>Signalized Intersections</th>
<th>Baseline Condition As Presented in DEIS</th>
<th>With Development As Presented in DEIS</th>
<th>With Development and Alternative Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>72</td>
<td>Maple Road / Alderwood Mall Pkwy 33rd Ave N Ext. / 30th Place</td>
<td>E 60.4 0.95</td>
<td>D 47.6 0.95</td>
<td>D 54.3 0.99</td>
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<td>5002</td>
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<td>B 14.5 0.76</td>
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<td>5011</td>
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<td>C 21.3 0.62</td>
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1. LOS = Level of service.
2. Delay = Average seconds of delay per vehicle.

2. Short-Term Operations with Costco

In the short-term, the proposed development would construct the new Bypass Roadway and the planned Costco Warehouse and Fuel Station. The remainder of the mixed-use development would be constructed during subsequent phases. Based on trip generation estimates developed for the DEIS by Kittelson & Associates, Inc., the Costco Warehouse and Fuel Center is expected to generate 435 net new PM peak hour trips. For comparison, the full Alternative 2 development scenario that was evaluated in the DEIS considered a total of 1,223 net new PM peak hour trips. Therefore, the first development phase with Costco would reflect less than 36% of the full project traffic evaluated. As demonstrated in the previous section, the Maple Road/Alderwood Mall Parkway intersection is projected to operate at LOS D with traffic generated by the full development with the alternative mitigation option. This option would maintain the existing four-lane channelization on the east leg of the intersection. Based on this result, the intersection would also operate acceptably with the same configuration and only the Costco portion of the development.

Attachments: Alternative Mitigation Option Channelization Sketch LOS Calculation sheets for Alternative Mitigation Option TSM/ISM

Lynnwood Crossing Mitigation Review at Maple-Alderwood Mall - DRAFT.docx

November 29, 2011

- 2 -
Lynnwood Crossing
## Chapter 2: Additional Information

### Lynnwood Crossing DEIS

#### 22-30th Pi & Alderwood Mall Pky

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#### Interim Decision:

- Action Item 4
- Action Item 5

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### Additional Information:

- Table 2.1: Traffic Flow Analysis
- Table 2.2: Capacity Utilization
- Table 2.3: Queue Length Analysis

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**Note:** The table and figures are placeholders for the actual data and analysis. The actual content should be filled in according to the requirements and data available.

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**Source:***Transportation Planning, Inc.*

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Planned Action EIS
Lynnwood Crossing
Chapter 2: Additional Information

Lynnwood Crossing DEIS
Alt 2 with Bypass - Channelization Test
HCM Signalized Intersection Capacity Analysis
## Planned Action EIS

### Chapter 2: Additional Information

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### Intersection Summary

- **HCM Average Control Delay**: 21.3
- **HCM Volume to Capacity ratio**: 0.62
- **Actuated Cycle Length (s)**: 110.0
- **Intersection Capacity Utilization**: 66.7%
- **Analysis Period (min)**: 15
- **Critical Lane Group**:

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8/21/2012 5:00 pm

Heffron Transportation, Inc. - TSM

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Synchro 7 - Report

Page 3

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Planned Action EIS

Lynnwood Crossing

Chapter 2: Additional Information

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III. CHAPTER 3

Comments on the Draft EIS and Responses to Comments

A. Introduction

This chapter of the Final EIS contains comments received on the Draft EIS during the public review period and the responses to these comments. A total of eleven comment letters and emails were received during the review period; each letter/email is included in its entirety in this chapter. The comment numbers that appear in the margins of the letters are cross-referenced to the corresponding response provided after each letter. Expressions of opinion, subjective statements, and positions for or against the proposed action are acknowledged without further response. Written comments were received from the following organizations and individuals:

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Letter No. 1

Paul Krauss
City of Lynnwood
P.O. Box 5008
Lynnwood, WA 98046-5008

November 18, 2011

Re: Lynnwood Crossing EIS

Dear Mr. Krauss:

Community Transit appreciates the opportunity to provide comments for proposed long range plans and current development proposals throughout Snohomish County. It is our policy to help ensure that future growth is compatible with public transportation services offered by Community Transit. Staff is providing the following comments in response to the Notice of Draft Environment Impact Statement (DEIS) for Lynnwood Crossing.

Community Transit does not have a position regarding a preferred alternative; however, we do have some concerns and comments regarding the transportation impacts and mitigation addressed in the DEIS. There are currently three Community Transit routes and one Sound Transit route that provide all day, frequent, service along the Alderwood Mall Parkway (Parkway). With the February 2012 Service Change, Community Transit will continue to provide 20 minute service along the Parkway during AM and PM peak hours, and 30 minute service midday, after 7 PM and on Saturdays.

In addition to existing service, Community Transit has identified the Parkway as a possible link for the 196th Street/164th Street Transit Emphasis Corridor, see attachment. Swift service is identified as the preferred service type for this corridor when funding and demand support this level of service in the future. Performance standards for Swift service include, but are not limited to, a dedicated lane such as a Business Access/Transit (BAT), limited parking, buildings constructed close to the corridor, and land use intensities of 30+ persons or jobs per acre.

Our primary goal is to retain speed and reliability in this area, to provide an appealing mode choice for residents, consumers, and employees traveling through the corridor. With this focus, Community Transit provides the following comments and suggestions:

1. Community Transit concurs with the required mitigation for all five alternatives to include the full “bypass” road along the west and north perimeters of the site, connecting 33rd Avenue W, from 184th Street SW to the Parkway, consistent with the City’s long range plan.
2. Transportation demand management (TDM) strategies should be required to further mitigate unavoidable traffic impacts identified by the proposed development alternatives. These strategies, including the ones listed in Lynnwood Municipal Code Section 21.18.850(C), connect travelers with existing bus, vanpool, carpool and non-motorized transportation options. Specific strategies, like transit pass program, can incentivize non-single occupant vehicle (SOV) travel when applied to high density developments. Implementing a comprehensive parking management program can also reduce the number of vehicles utilizing residential developments. TDM strategies are vital to reducing SOV for both commercial and residential developments, and are consistent with the revised purpose statement for the Commercial-Residential (C-R) zone.

3. Pedestrian connection between the proposed commercial developments within the site and the right-of-way along the Parkway and 184th Street SW should be integral to the site plan. Community Transit has existing stops on the Parkway: a northbound stop in front of the AM/PM station on the northeast corner of Parkway and Maple Road, and a southbound stop at the southwest corner of the same intersection. Additionally, Community Transit has service on 184th Street SW, west of the Alderwood Mall; on 33rd Avenue West, and 36th Avenue West. See the attached map.

4. Community Transit concurs with the City’s statements regarding the need to complete the 179th Street SW extension between 36th Avenue West and the subject development. Configuration 2 (in Table 1 – Summary of Environmental Impacts, Mitigation Measures, and Unavoidable Adverse Impacts), which retains 30th Place West, and making use of the existing signalized intersection at Maple Rd and the Parkway is preferred. Any additional signal along the Parkway will cause delay to transit operations.

In closing, we appreciate the opportunity to review and comment on the Lynnwood Crossing DEIS. We are available to answer questions and provide additional input, as needed.

Sincerely,

Kate Tourellot
Senior Transportation Planner
Community Transit
kate.tourellot@commtrans.org
(425) 348-2314

Enclosure

cc: Community Transit Corridor Team

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Corridor 10
164th Street/196th Street

From Edmonds Ferry Dock, via 3rd and Caspers to 196th, then 28th, Alienwood Mall Parkway, 164th Mill Creek Road, Seattle Hill, 132nd, 134th, and Cathcart, ending at SR-8

Summary of Findings and Recommendations – The 164th Street Corridor has the potential to support Swift BRT service by 2030.