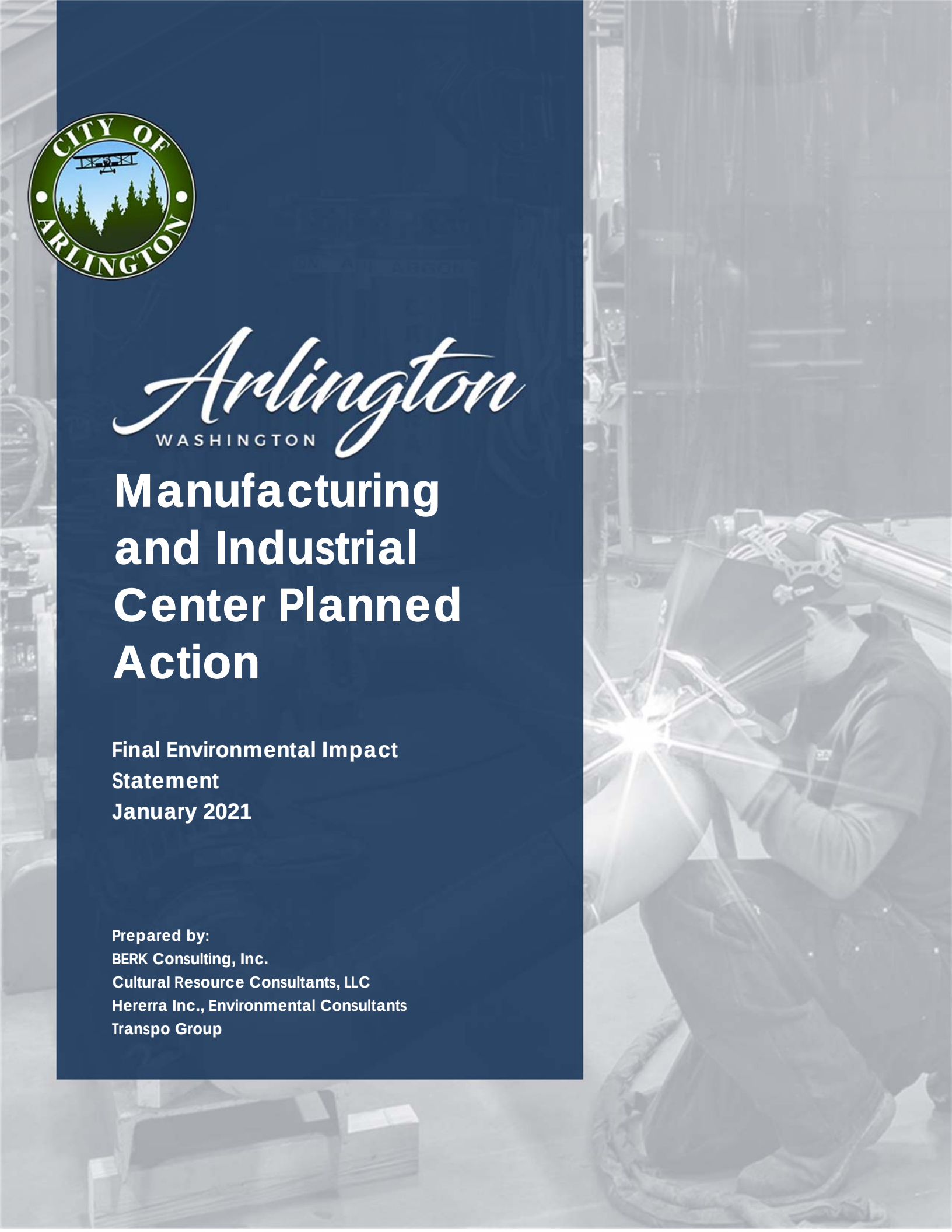

Arlington
WASHINGTON

Manufacturing and Industrial Center Planned Action

Final Environmental Impact Statement
January 2021

Prepared by:
BERK Consulting, Inc.
Cultural Resource Consultants, LLC
Hererra Inc., Environmental Consultants
Transpo Group

Cover Letter

January 11, 2021

Subject: Cascade Industrial Center Planned Action EIS

Dear Reader,

The Cascade Industrial Center (formerly called the Arlington-Maryville Manufacturing Industrial Center or AMMIC) is a vibrant industrial employment center for the city of Arlington. Given the area's importance to the local and regional economy, and its desire to keep the center vital and thriving, the City completed a subarea plan that included a vision, and goals and policies for the future. This proposal is to adopt a Planned Action consistent with RCW 43.21c.440 and associated Comprehensive Plan amendments to address necessary capital investments that study implementation of the AMMIC Subarea Plan.

The Draft EIS on the proposal was issued on October 1, 2020. The City evaluated three alternatives in the Draft Environmental Impact Statement (DEIS):

- **No Action Alternative** – The Current Comprehensive Plan and Zoning would be retained and allow modest job increases. Given current market conditions this is likely to reflect existing job sectors in the subarea.
- **Alternative 1: Cascade Center Vision Job Sectors**: Alternative 1 is based on the vision for job growth, geographical distribution, and sector mix of the AMMIC Subarea Plan. Higher density employment is anticipated on sites identified as "opportunity sites" in the Subarea Plan and development at existing employment density is anticipated on the remaining sites with development capacity. Employment uses would be designed to take advantage of the area's natural features, including a relocated Edgecomb Creek. In addition to high density industrial or manufacturing employment, workforce training, incubators and similar entrepreneurial support facilities would be newly established. Future development under this alternative is anticipated to include a small amount of new residential development that is compatible with the industrial land use mix of the center.
- **Alternative 2: High Growth Trend Sectors:** Alternative 2 anticipates a high growth scenario for employment within the center. Employment increases are anticipated across the center on all sites with development capacity. Similar to Alternative 1, employment uses would be designed to take

advantage of the area's natural features, including a relocated Edgecomb Creek. The sectoral mix of employment under this alternative is anticipated to reflect current trends.

The Draft EIS evaluated the three alternatives for potential adverse and beneficial impacts to the environment including: natural environment, cultural resources, transportation, land use and aesthetics, public services, and utilities.

Issuance of the Draft EIS was followed by a thirty-day comment period. One written comment from WSDOT was received. The City of Arlington considered this comment in preparing the enclosed Final EIS. The Final EIS describes the Preferred Alternative, identifies potential environmental impacts of the alternatives, and identifies mitigation measure to address identified impacts. The Final EIS also includes the City of Arlington's response to comments, including changes made in the EIS as a result of these comments.

The City of Arlington has determined that the preferred alternative best meets the city's purpose and need of 1) implementing the AMMIC Subarea Plan, (2) supporting an industrial and manufacturing center for the city and Snohomish County.

Following the issuance of the Final EIS, the City of Arlington will consider final action on the Planned Action and proposed Comprehensive Plan Amendments.

You may review the City of Arlington's website for more information at http://www.arlingtonwa.gov/310/Public-Notices. If you desire clarification or have questions please call Marc Hayes at 360.403.3457 or by mhayes@arlingtonwa.gov

Thank you for your interest in the Cascade Industrial Center.

Sincerely,

Marc Hayes

Community and Economic Development Director and SEPA Responsible Official

Fact Sheet

Project Title

Arlington Manufacturing and Industrial Center Planned Action

Proposed Action and Alternatives

The Arlington portion of the Cascade Industrial Center (CIC) is a long-standing industrial employment center with a diverse range of manufacturing, warehousing and distribution businesses. The City desires to ensure that the CIC continues to be a economically vital center with both regional and local significance. With this goal, the City adopted a subarea plan for the Center with a vision, land use, and economic development action strategies. The subarea plan was adopted by reference into the Comprehensive Plan. The City intends to adopt a planned action under RCW 43.21C.440 to facilitate future permitting of devleopment consistent with the subarea plan.

To help form the planned action, the City evaluated three alternatives in the DEIS:

- **No Action Alternative** – The Current Comprehensive Plan and Zoning would be retained and allow modest increases in jobs.
- **Alternative 1 Cascade Center Vision Job Sectors:** Alternative 1 is based on the vision for job growth, geographical distribution, and sector mix of the Arlington-Marysville Manufacturing Industrial Center (AMMIC) Subarea Plan. Higher density employment is anticipated on sites identified as "opportunity sites" in the Subarea Plan and lower density development (at existing employment density) is anticipated on the remaining sites with development capacity. High density employment is anticipated in sectors identified in the Subarea Plan such as aerospace, advanced manufacturing, food processing, maritime, wood products and mass timber manufacturing.

- **Alternative 2: High Growth Trend Sectors:** Alternative 2 anticipates a high growth scenario for employment within the center. Employment increases are anticipated across the center on all sites with development capacity.

Through the Draft EIS public outreach opportunities during the comment period and in response to comments, a **Preferred Alternative** was developed in the range of the alternatives above. The Preferred Alternative provides for the high growth employment of Alternative 2 with the Alternative 1 based on the vision geographical distribution, and sector mix of the Arlington-Marysville Manufacturing Industrial Center (AMMIC) Subarea Plan. High density employment is anticipated in sectors identified in the Subarea Plan such as aerospace, advanced manufacturing, food processing, maritime, wood products and mass timber manufacturing. A small amount of residential development and workforce training facilities are also anticipated.

Similar to the Action Alternatives, Edgecomb Creek is anticipated to be relocated under the Preferred Alternative.

Proponent and Lead Agency

City of Arlington

Location

The Study Area is about 2,170 acres in area based on parcels, and is bounded by the Portage Creek Wildlife area and Cemetery Road in the north, Arlington Downtown to the east, the City of Marysville on the south, and Smokey Point Boulevard and Totem Park to the west.

Tentative Date of Implementation

Winter 2021

Responsible Official

Marc Hayes, Community and Economic Development Director
City of Arlington
18204 59th Dr. NE
Arlington, WA 98223
Ph: 360.403.3457
mhayes@arlingtonwa.gov

Contact Person

Marc Hayes, Community and Economic Development Director
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18204 59th Dr. NE
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Licenses or Permits Required

The Planned Action requires a 60-day review by the State of Washington Department of Commerce and other state agencies. Locally, the Planned Action will be considered by the Planning Commission and their recommendations forwarded to the City Council who will deliberate and determine approval.

Authors and Principal Contributors to the EIS

Under the direction of the Arlington Community Development Department, the consultant team prepared the EIS as follows:

- BERK Consulting: Planned Action SEPA Lead, Alternative Development, Land Use/Aesthetics
- Herrera: Plants and Animals, Water Resources, Utilities
- CRC: Cultural Resources
- Transpo Group: Transportation

Draft EIS Date of Issuance

October 1, 2020

Draft EIS Comment Period

Comment Period

The City of Arlington requested comments from citizens, agencies, tribes, and all interested parties on the Draft EIS from 10/ 01/2020 to 10/ 30/2020.

Due to COVID-19 pandemic, an online public open house and workshop to review alternatives, and the planned action, was conducted on **October 6, 2020** hosted by the Arlington Planning Commission over Zoom teleconferencing.

Issuance of Final EIS

January 11, 2021

Date of Final Action

January 19, 2021

Location of Background Data

Prior SEPA documents have addressed the Arlington CIC uniquely or cumulatively, including:

- City of Arlington Comprehensive Plan Environmental Impact Statement (EIS), 2015
- Snohomish County Comprehensive Plan EIS, 2015
- Determination of Non-Significance and Checklist for Subarea Plan for the Arlington-Marysville Manufacturing Industrial Center

You may review the City of Arlington's website for more information at www.arlingtonwa.gov/. If you desire clarification or have questions, please contact Marc Hayes at 360.403.3457 or by mhayes@arlingtonwa.gov.

Purchase/Availability of Final EIS

This Final EIS is available for review at Arlington City Hall: 238 N Olympic Avenue, Arlington, WA 98223. The Final EIS is posted on the City of Arlington's website at http://www.arlingtonwa.gov/310/Public-Notices. Compact disks or thumb drives are available for purchase at cost at Arlington City Hall.

Distribution List

The following agencies, organizations, and individuals received a notice of availability for the Draft and Final EIS. Digital copies of the documents were also provided to agencies with jurisdiction, local service providers, and other interested parties upon request.

Federal and Tribal Agencies

- Arlington Postmaster & Office
- Stillaguamish Tribe of Indians
- Tulalip Tribe of Indians

State and Regional Agencies

- Department of Agriculture
- Department of Archaeology and Historic Preservation
- WSDOT Aviation Division
- Department of Commerce
- Department of Corrections
- Department of Ecology
- Energy Facility Site Evaluation Council (EFSEC)
- Department of Fish and Wildlife
- Department of Health
- Department of Natural Resources
- Parks and Recreation Commission
- Puget Sound Clean Air Agency
- Puget Sound Partnership
- Puget Sound Regional Council
- Department of Social and Health Services
- Department of Transportation

County Officials

- Snohomish County – Public Works
- Snohomish Co. Traffic Review (SEPA)
- Snohomish County – Planning
- Snohomish County – Boundary Review

Adjacent Jurisdictions

- City of Marysville – Planning
- City of Marysville – Utilities
- City of Marysville – Cross Connection

Services, Utilities, and Transit

- Burlington Northern Railroad
- Cascade Natural Gas
- Community Transit
- Energy Facility Site Evaluation Council
- Snohomish County PUD
- Snohomish Health District
- Waste Management
- Arlington School District
- Lakewood School District

Community Organizations and Individuals

- Notice is sent to a Community Development Department Listserv of persons interested in planning in the City.

Media

- Everett Herald

Contents

Exhibits

1.0 Summary

The proposed study area is the Arlington Cascade Industrial Center encompassing about 2,291 acres surrounding and including the Arlington Municipal Airport (AWO). See The study area is the Arlington portion of the Cascade Industrial Center. Formerly known as the Arlington-Marysville Manufacturing Industrial Center the CIC straddles the cities of Arlington and Marysville. The Arlington portion of this center encompasses about 2,291 acres surrounding and including the Arlington Municipal Airport (AWO).

Exhibit 1.

1.1 Purpose

The proposal includes the adoption of a Planned Action consistent with RCW 43.21c.440 and associated Comprehensive Plan amendments to address necessary capital investments that study implementation of the Arlington-Marysville Manufacturing Industrial Center (AMMIC) Subarea Plan and associated implementing policies/regulatory amendments.

Four alternatives are compared and contrasted in this Final Enviornmental Impact Statement (Final EIS):

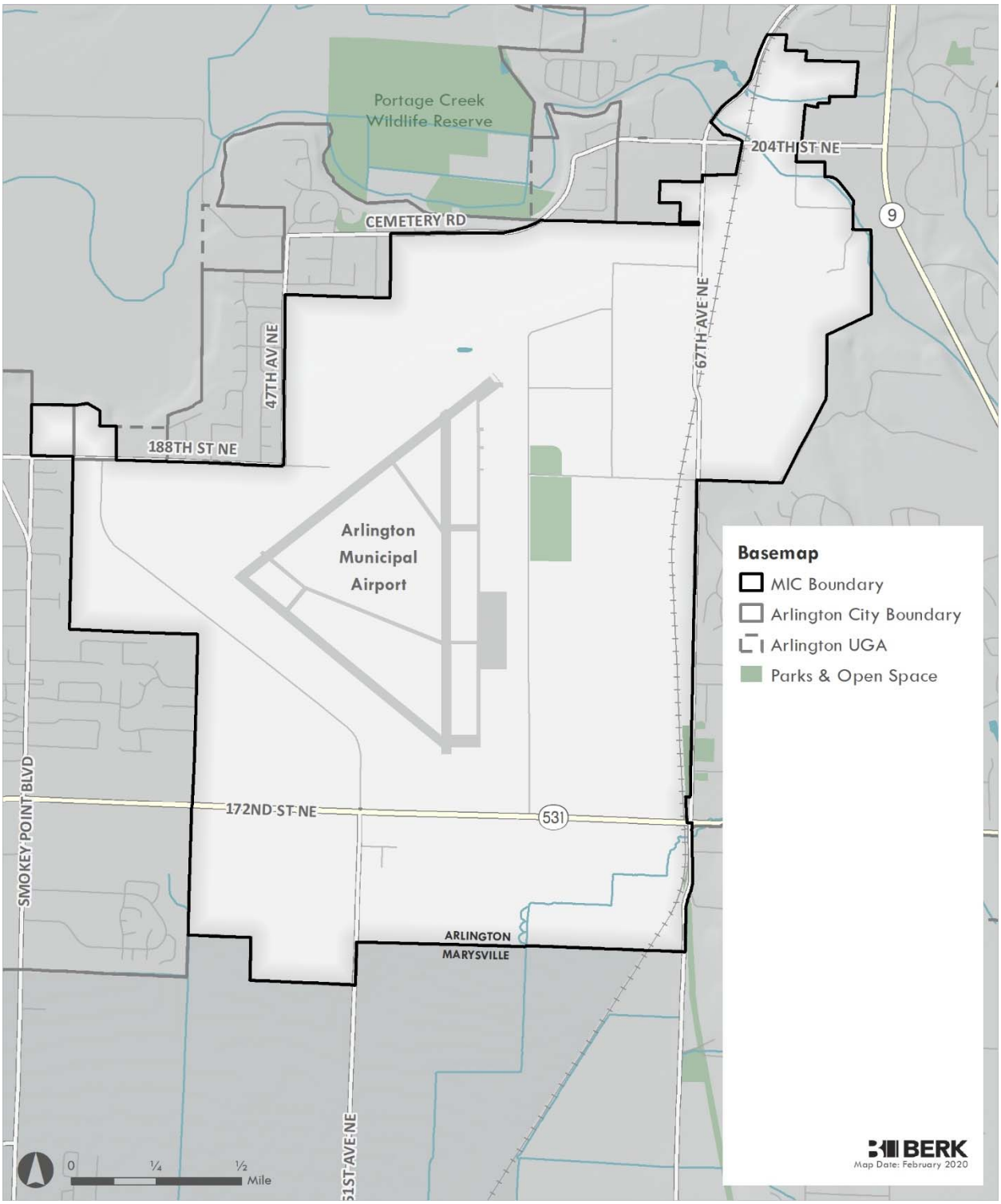
- No Action Alternative – Current Comprehensive Plan and Zoning
- Alternative 1
- Alternative 2
- Preferred Alternative

Through the Draft EIS public outreach opportunities during the comment period and in response to comments, a Preferred Alternative was developed by the Planning Commission and reviewed by the City Council that is in the range of the No Action, Alternative 1, and Alternative 2 and combined features of them.

1.1.1 Description of the Study Area

The study area is the Arlington portion of the Cascade Industrial Center. Formerly known as the Arlington-Marysville Manufacturing Industrial Center the CIC straddles the cities of Arlington and Marysville. The Arlington portion of this center encompasses about 2,291 acres surrounding and including the Arlington Municipal Airport (AWO).

Exhibit 1. Study Area



Source: City of Arlington, 2020; BERK, 2020.

1.1.2 Organization of this Document

This Final EIS is organized into chapters as follows:

- Chapter 1.0 Summary
- Chapter 2.0 Preferred Alternative
- Chapter 3.0 Responses to Comments and Clarifications and Corrections to Draft EIS
- Chapter 4.0 Acronyms and References
- Chapter 5.0 Appendices

The Final EIS Chapter 1 Summary overviews the environmental review of studied alternatives, The Preferred Alternative is described in more detail in Chapter 2. The Final EIS responds to comments in Chapter 3.

The chapters of the Final EIS complete the environmental evaluation of the Proposal, but does not repeat the more detailed analysis in the Draft EIS. This Final EIS should be read in conjunction with the Draft EIS.

1.2 Subarea Planning Process

The CIC EIS builds on the subarea plan planning process. Public participation was an important aspect of the subarea planning process; feedback informed various stages of Plan development, including visioning, plan alternatives, goals, and policies. Engagement activities included stakeholder interviews, an online community survey, a vision public workshop, advisory committee meetings, a draft plan workshop and public meetings during the legislative process.

1.3 EIS Public Comment Opportunities

The City conducted a 21-day scoping process to gain feedback on the contents of the EIS from April 7 to April 28, 2020. With the publication of the Draft EIS, a 30-day comment period was established from October 1, 2020 to October 30, 2020. A community meeting was conducted in this period to assist with development of a Planned Action and Preferred Alternative. The Draft EIS was also shared with City decision makers.

The Planning Commission held a public hearing on the Draft Subarea Plan and Planned Action. Their recommendations were forwarded to the City Council for a public hearing and deliberation. The schedule was posted on the project website.

1.4 Objectives and Alternatives

1.4.1 Objectives

SEPA requires a statement of objectives that address the purpose and need for the proposal. The proposal objectives for the CIC are based on the AMMIC Subarea Plan Guiding Principles and objectives for Coordinated Planning.

Guiding Principles

Coordinated investments and regional impact.

- Coordinated investments within the AMMIC allow it to function as a regional center with a focus on production, especially advanced manufacturing. AMMIC businesses leverage and support manufacturing industrial activity across the region, including activities at Paine Field, Port of Everett and Port of Seattle Tacoma. In addition to Arlington and Marysville, Snohomish County and the central Puget Sound region benefit from development in the AMMIC through its positive impact on regional economic health and competitiveness.

Economic diversity.

- The presence of a variety of economic activities allows cities and regions to be resilient against changing economic trends and cycles. The AMMIC provides opportunities for a broad range of economic activities and industries. Employment-rich production businesses contribute to job growth in the Center. These include business in advanced manufacturing, aerospace, food processing, mass timber, as well as broader manufacturing activity. AMMIC businesses also engage in repair and distribution to support and leverage manufacturing and industrial activity.

Building on and strengthening distinctive competitive advantages.

- The AMMIC enjoys a distinct competitive advantage in the region for manufacturing, especially related to aerospace. In addition to a diverse range of firms, the AMMIC builds on this recognized business and industry clusters to leverage its comparative advantage and agglomeration benefits.

Economic activity and opportunity.

- AMMIC's industrial businesses create jobs that pay good wages and are accessible to people with all levels of education. Partnerships with local community colleges, high schools, as well as other local and regional institutions ensure residents have access to training opportunities and businesses have access to a trained workforce. The presence of affordable housing in both Arlington and Marysville support the local workforce and economy.

Accessibility and connectivity.

- Planned transportation improvements in and around the AMMIC have increased capacity, reduced conflicts with the railroad, and improved freight connectivity. AMMIC employees can access readily available public transit, including the future SWIFT BRT on Smokey Point Blvd. The Cities of Arlington and Marysville, local businesses and Community Transit, have partnered to provide innovative, on-demand transit or feeder routes that serve industrial facilities and provide good connections to transit and to park and ride facilities. Nonmotorized facilities within the AMMIC have improved and employees and residents enjoy easy access to the Arlington Airport Trail and the Centennial Trail.

High quality design.

- Industrial development in the MIC is consistent with design standards to ensure quality development that benefits property owners and the Cities.

Sustainability.

- Development in the AMMIC is consistent with standards for modern industrial development and environmental requirements. Where feasible, industrial facilities integrate low impact development concepts, including rain gardens, pervious pavements, and green roofs. Industrial development also utilizes alternative energy sources such as wind and solar power.

1.4.2 Alternatives

This Environmental Impact Statement (EIS) studied alternatives described below. The Preferred Alternative is further detailed in Chapter 2:

- **No Action Alternative** – The Current Comprehensive Plan and Zoning would be retained and allow modest job increases. Given current market conditions this is likely to reflect existing job sectors in the subarea.
- **Alternative 1: Cascade Center Vision Job Sectors** – Alternative 1 is based on the vision for job growth, geographical distribution, and sector mix of the Arlington-Marysville Manufacturing Industrial Center (AMMIC) Subarea Plan. Higher density employment is anticipated on sites identified as "opportunity sites" in the Subarea Plan and lower density development (at existing employment density) is anticipated on the remaining sites with development capacity. High density employment is anticipated in sectors identified in the Subarea Plan such as aerospace, advanced manufacturing, food processing, maritime, wood products and mass timber manufacturing. The greatest increases in employment are anticipated on undeveloped, shovel-ready land at the Airport Business Park site immediately west of the Arlington Municipal Airport. Slightly smaller increases are anticipated on the site north of the airport at 47th Ave NE, on the parcel at the intersection of 67th Ave NE and 199th St NE, on the site east of 59th Ave and south of 172nd Avenue NE, and on the site east of the airport and west of 67th Ave NE. Employment uses would be designed to take advantage of the

area's natural features, including a relocated Edgecomb Creek. In addition to high density industrial or manufacturing employment, workforce training, incubators and similar entrepreneurial support facilities would be newly established on the Airport Business Park site immediately west of the airport. This would support the industry sectors identified in the Subarea Plan especially food processing and seafood industries and robotics. Along with diverse industrial development, future development under this alternative is anticipated to include a small amount of new residential development that is compatible with the industrial land use mix of the center. See Exhibit 8. This alternative supports net increases of employment of 6,625 jobs, 516 dwellings, and 1,383 residents. See Exhibit 6.

- **Alternative 2: High Growth Trend Sectors** – Alternative 2 anticipates a high growth scenario for employment within the center. Employment increases are anticipated across the center on all sites with development capacity. See Exhibit 10. The greatest increases in employment are anticipated on undeveloped, shovel-ready land at the Airport Business Park site immediately west of the Arlington Municipal Airport and the site north of the airport at 47th Ave NE. Slightly smaller increases of employment are anticipated on the parcel at the intersection of 67th Ave NE and 199th St NE, on the site east of 59th Ave and south of 172nd Avenue NE, and on the site east of the airport and west of 67th Ave NE. Similar to Alternative 1, employment uses would be designed to take advantage of the area's natural features, including a relocated Edgecomb Creek.

  The sectoral mix of employment under this alternative is anticipated to reflect current patterns and countywide trends. Current employment patterns show less than half of the total jobs in Manufacturing and close to 20% of jobs in Warehousing, Transportation and Utilities. Workforce training, incubators and similar entrepreneurial support facilities or residential development suitable to industrial districts are not anticipated in this alternative. Without a focus on manufacturing sectors identified in the Subarea Plan, and supportive investments in workforce training and education, this pattern is expected to continue. See Exhibit 8. This alternative supports net increases of employment of 8,844 jobs with no changes to dwellings or population compared to existing conditions and the No Action Alternative. See Exhibit 9.

- The **Preferred Alternative** provides for the high growth employment of Alternative 2 with the Alternative 1 vision, geographical distribution, and sector mix of the Arlington-Marysville Manufacturing Industrial Center (AMMIC) Subarea Plan. High density employment is anticipated in sectors identified in the Subarea Plan such as aerospace, advanced manufacturing, food processing, maritime, wood products and mass timber manufacturing. A small amount of residential development and workforce training facilities are also anticipated. Similar to Alternatives 1 and 2, Edgecomb Creek is anticipated to be relocated under the Preferred Alternative.

Major features of the alternatives are described and compared below.

Land Use

Each alternative proposes a different mix of employment sectors within existing land use designations, particularly Alternative 1. See Exhibit 2.

Exhibit 2. Alternative Parcel Acres by Zoning District

Designation	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
General Industrial	861.86	861.86	861.86	861.86
Aviation Flightline	737.02	737.02	737.02	737.02
Light Industrial	236.68	312.52	236.68	312.52
Business Park	165.57	193.01	165.57	193.01
General Commercial	165.23	63.44	165.23	63.44
Highway Commercial	88.42	86.93	88.42	86.93
Public/Semi-Public	35.98	35.98	35.98	35.98
Grand Total	**2,290.78**	**2,290.78**	**2,290.78**	**2,290.78**

Source: BERK, 2020.

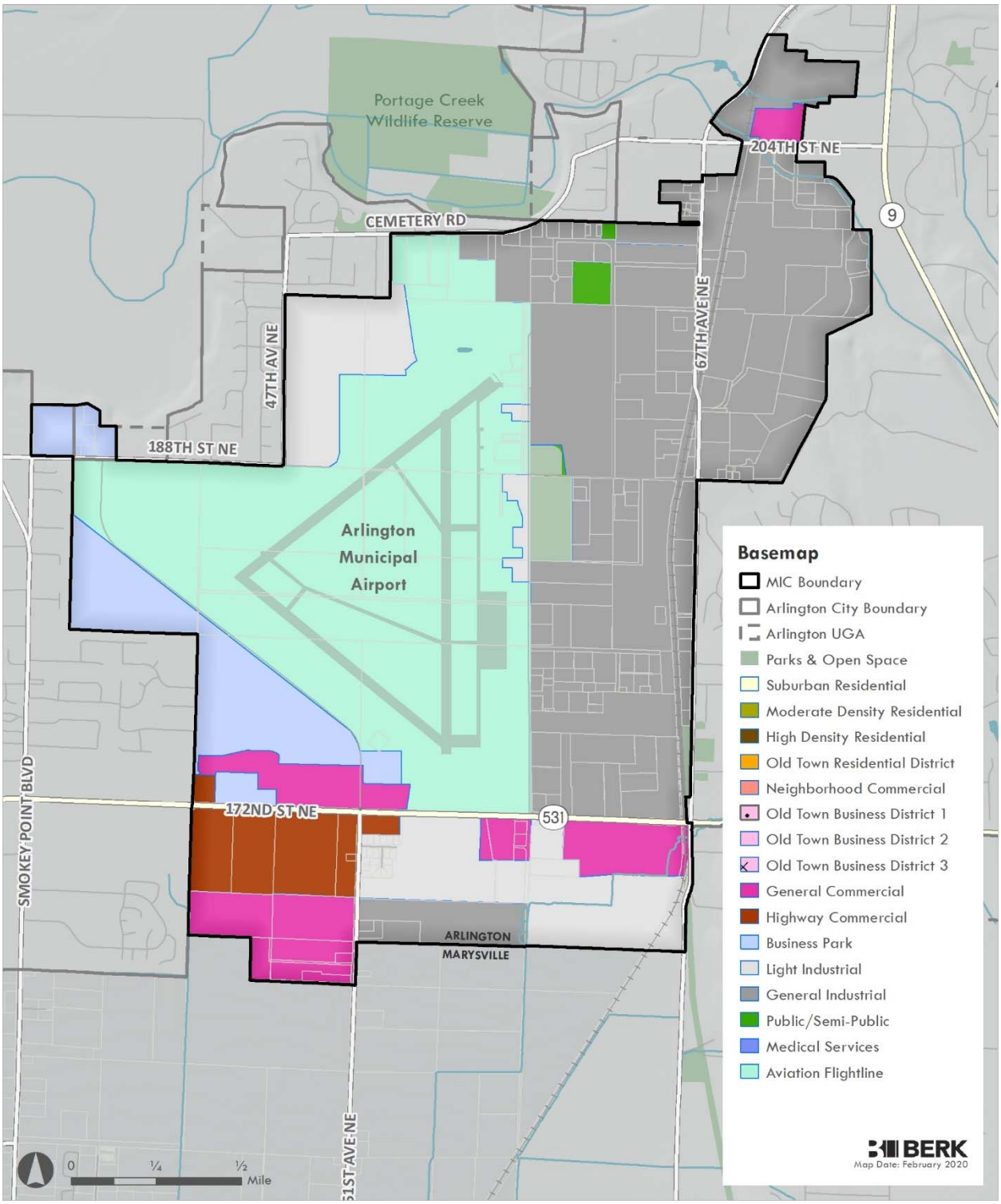
No Action Alternative

The No Action Alternative would continue the current Comprehensive Plan designation and Zoning for the study area. No changes to the Comprehensive Plan to addressed added infrastructure investments in the Capital Facility Plan or other amendments necessary to implement Subarea Plan strategies for CIC opportunity sites in Arlington would be addressed. No Planned Action would be adopted to facilitate environmental review of new development or redevelopment.

The current intent for the Arlington portion of the CIC is to serve as a manufacturing and industrial employment center, with a diverse range of industrial activities that provide employment opportunities for residents in Snohomish County and the region.

The majority (~80%) of the Study Area is currently zoned for industrial/aviation uses across Aviation Flightline, General Industrial, and Light Industrial zoning districts. See Exhibit 13 and Exhibit 14. The No Action Alternative would allow for net growth rounded to 4,824 jobs with no changes to housing. See Exhibit 12. The No Action Alternative plans assume current employment density and sectoral distribution with the existing 4,969 jobs maintained and increased; however, there are no incentives or investments planned.

Exhibit 3. Current Zoning Designations within CIC, 2020

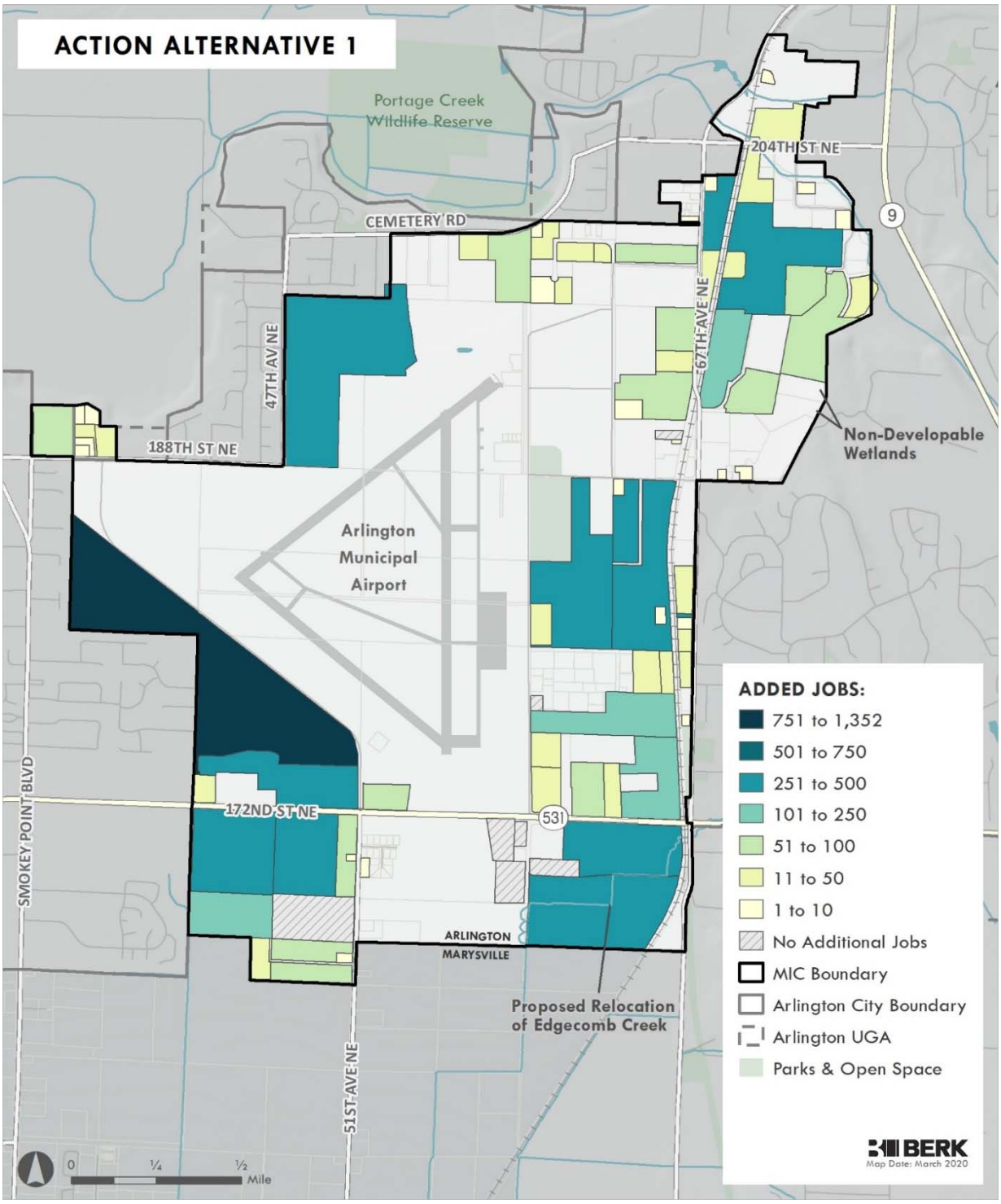


Source: City of Arlington, 2020; Snohomish County, 2020; BERK, 2020.

Alternative 1: Cascade Center Vision Job Sectors

Alternative 1 is based on the vision for job growth, geographical distribution, and sector mix of the Arlington-Marysville Manufacturing Industrial Center (AMMIC) Subarea Plan. Higher density employment is anticipated on sites identified as "opportunity sites" in the Subarea Plan and lower density development (at existing employment density) is anticipated on the remaining sites with development capacity. High density employment is anticipated in sectors identified in the Subarea Plan such as aerospace, advanced manufacturing, food processing, maritime, wood products and mass timber manufacturing. The greatest increases in employment are anticipated on undeveloped, shovel-ready land at the Airport Business Park site immediately west of the Arlington Municipal Airport. Slightly smaller increases are anticipated on the site north of the airport at 47th Ave NE, on the parcel at the intersection of 67th Ave NE and 199th St NE, on the site east of 59th Ave and south of 172nd Avenue NE, and on the site east of the airport and west of 67th Ave NE. Employment uses would be designed to take advantage of the area's natural features, including a relocated Edgecomb Creek. In addition to high density industrial or manufacturing employment, workforce training, incubators and similar entrepreneurial support facilities would be newly established on the Airport Business Park site immediately west of the airport. This would support the industry sectors identified in the Subarea Plan especially food processing and seafood industries and robotics. Along with diverse industrial development, future development under this alternative is anticipated to include a small amount of new residential development that is compatible with the industrial land use mix of the center

Exhibit 4. Alternative 1: Cascade Center Vision Job Sectors



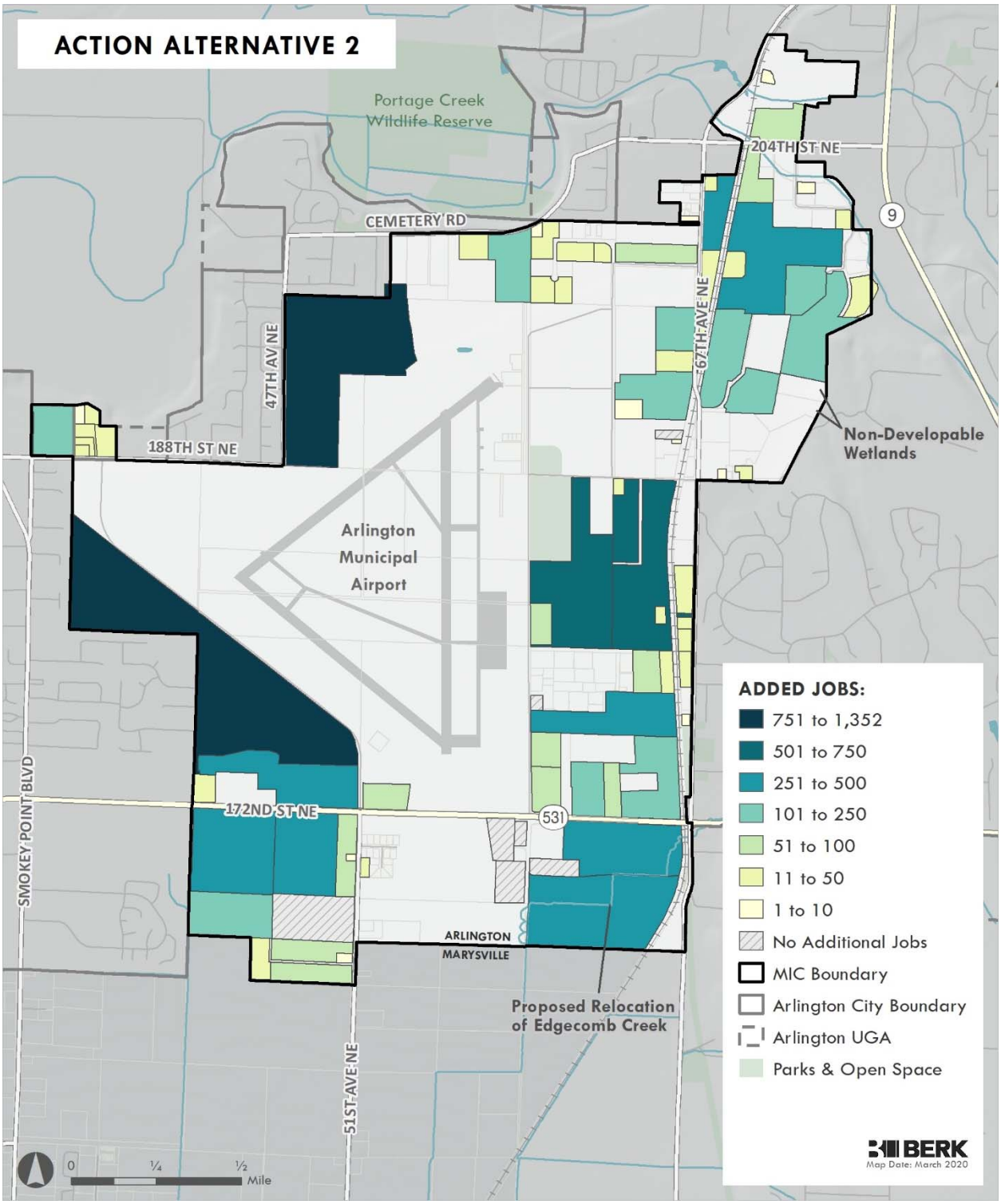
Source: City of Arlington 2020; BERK, 2020.

Alternative 2: High Growth Trend Sectors

Alternative 2 anticipates a high growth scenario for employment within the center. Employment increases are anticipated across the center on all sites with development capacity. See Exhibit 10. The greatest increases in employment are anticipated on undeveloped, shovel-ready land at the Airport Business Park site immediately west of the Arlington Municipal Airport and the site north of the airport at 47th Ave NE. Slightly smaller increases of employment are anticipated on the parcel at the intersection of 67th Ave NE and 199th St NE, on the site east of 59th Ave and south of 172nd Avenue NE, and on the site east of the airport and west of 67th Ave NE. Similar to Alternative 1, employment uses would be designed to take advantage of the area's natural features, including a relocated Edgecomb Creek.

The sectoral mix of employment under this alternative is anticipated to reflect current patterns and countywide trends. Current employment patterns show less than half of the total jobs in Manufacturing and close to 20% of jobs in Warehousing, Transportation and Utilities. Workforce training, incubators and similar entrepreneurial support facilities or residential development suitable to industrial districts are not anticipated in this alternative. Without a focus on manufacturing sectors identified in the Subarea Plan, and supportive investments in workforce training and education, this pattern is expected to continue.

Exhibit 5. Alternative 2: High Growth Trend Sectors



Source: City of Arlington 2020; BERK, 2020.

Preferred Alternative

Following the Draft EIS comment period, the City developed a Preferred Alternative that is similar to studied alternatives. The Preferred Alternative provides for the high growth employment of Alternative 2 with the Alternative 1 vision, geographical distribution, and sector mix of the AMMIC Subarea Plan. High density employment is anticipated in sectors identified in the Subarea Plan such as aerospace, advanced manufacturing, food processing, maritime, wood products and mass timber manufacturing. A small amount of residential development and workforce training facilities are also anticipated. Similar to the Action Alternatives, Edgecomb Creek is anticipated to be relocated under the Preferred Alternative.

Land Use Comparison

Each alternative proposes a different mix of employment sectors within existing land use designations, particularly Alternative 1. See Exhibit 20.

Exhibit 6. Alternative Parcel Acres by Zoning District

Designation	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
General Industrial	861.86	861.86	861.86	861.86
Aviation Flightline	737.02	737.02	737.02	737.02
Light Industrial	236.68	312.52	236.68	312.52
Business Park	165.57	193.01	165.57	193.01
General Commercial	165.23	63.44	165.23	63.44
Highway Commercial	88.42	86.93	88.42	86.93
Public/Semi-Public	35.98	35.98	35.98	35.98
Grand Total	**2,290.78**	**2,290.78**	**2,290.78**	**2,290.78**

Source: BERK, 2020.

Growth Comparison

Each alternative's projected growth is listed in Exhibit 7. Alternative Comparison of Total and Net Growth. Alternative 2 has the greatest total employment and would retain and increase jobs. It would not add any new dwellings compared to the No Action Alternative. Alternative 1 would increase employment by 6,625, or 1,801 jobs more than the No Action Alternative and 2,219 less than Alternative 2. Alternative 1 would support the vision, intent and sectoral mix outlined in the Subarea Plan and accommodate supportive uses such as educational/workforce training facilities and business incubators. Alternative 1 would also add a small number of dwellings such as live/work units suitable in industrial districts compared to the No Action Alternative and Alternative 2.

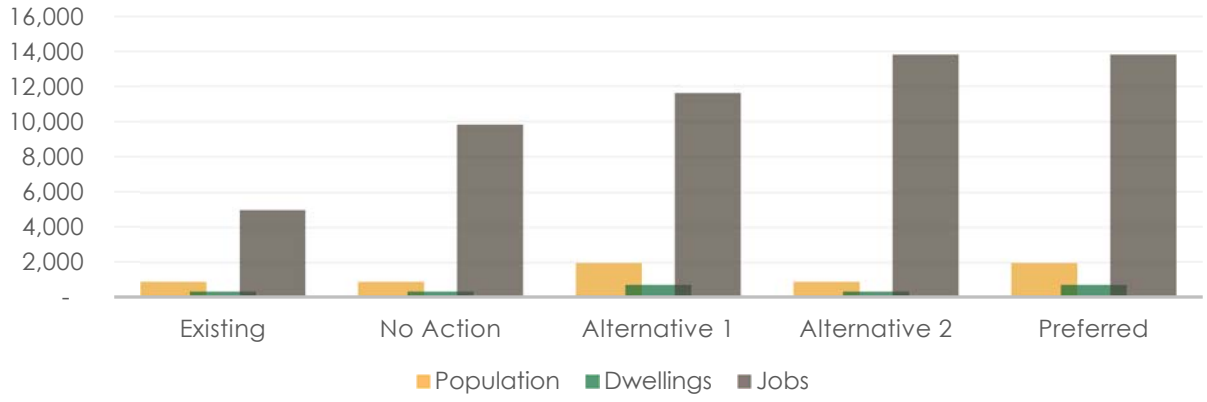
Exhibit 7. Alternative Comparison of Total and Net Growth

	Existing	No Action	Net Change*	Alternative 1	Net Change*	Alternative 2	Net Change*	Preferred Alternative	Net Change*
Population	890	890	0	2,273	1,383	890	0	2,273	1,383
Dwellings	332	332	0	848	516	332	0	848	516
Jobs	4,969	9,793	4,824	11,594	6,625	13,813	8,844	13,813	8,844

*Net change compared to existing.
Source; PSRC 2020; Transpo Group 2020; BERK, 2020.

The total population, housing, and jobs for each alternative is illustrated in Exhibit 8. Total Population, Dwellings, and Jobs 2040 by Alternative. As noted above, Alternative 2 has the greatest total jobs with sectors similar to current conditions and trends whereas Alternative 1 grows jobs compared to No Action Alternative and has a different sectoral mix than both the No Action and Alternative 2; Alternative 1 has a smaller number of total jobs than Alternative 2 and has includes a small share of housing. Given the location of the CIC, the No Action Alternative would likely result in a mix of industrial and commercial employment sectors. Though the No Action Alternative has capacity for jobs, without further investment there are not likely to be the land use mix or employment sectors envisioned in the Subarea Plan. The Preferred Alternative includes the same number of jobs as Alternative 2 and the housing of Alternative1. Jobs sectors and geographic distribution of jobs in the Preferred Alternative are expected to be similar to Alternative1.

Exhibit 8. Total Population, Dwellings, and Jobs 2040 by Alternative



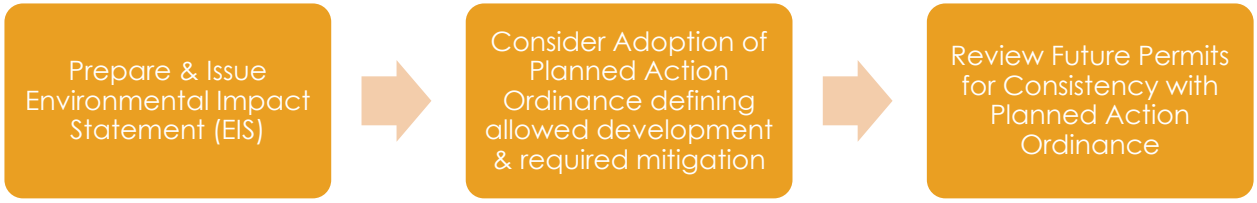
Source: PSRC, 2020; Transpo Group, 2020; BERK, 2020.

Planned Actions

Action Alternatives 1 and 2 and the Preferred Alternative propose the designation of a Planned Action in the Study Area, as authorized under SEPA (RCW 43.21C.440 and WAC 197-11-164 through -172). Planned actions provide more detailed environmental analysis during the area-wide planning phase, rather than during the permit review process. Future projects in the Study Area that develop under the designated Planned Action will not require SEPA threshold determinations at the time of permit application if they are certified as consistent with the type of development, growth and traffic assumptions, and mitigation measures studied in the EIS. Such projects are still required to comply with adopted laws and regulations and would undergo review pursuant to the City's adopted land use and building permit procedures.

See Exhibit 9. Planned Action Process for a summary of the process. A draft Planned Action Ordinance is included in Appendix B.

Exhibit 9. Planned Action Process



Source: BERK, 2020.

Comparison of Features

Based on the description of alternatives in this chapter, Exhibit 10 compares the features of the alternatives in terms of changes to plans and regulations and infrastructure investments.

Exhibit 10. Alternative Features

Feature	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Plans and Regulations				
Continue Current Plans and Regulations	X		X	
Implements Subarea Plan including changes to Capital Facilities Element to Support Growth		X	X	X
Implements Changes to Development Regulations Consistent with Subarea Plan		X		X
Planned Action Ordinance		X	X	X
Investments				
Current Transportation Investments	X	X	X	X

Feature	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Added Multimodal Transportation Investments to support Job Types		X	X	X
Add trail in the buffer of relocated Edgecomb creek		X	X	X

Source: BERK, 2020.

1.5 Key Issues and Options

1.5.1 Other Alternatives

The City explored several options for a mix of land use and zoning designations with during the Subarea Plan process before creating a bookend of alternatives to test in this EIS. These EIS alternatives are meant to identify pros, cons, and tradeoffs of employment intensities and patterns. A preferred alternative was developed through input and evaluated in the Final EIS, and combined elements of the Draft EIS Alternatives. The Preferred Alternative was in the range of alternatives studied and evaluated in the Draft EIS.

1.5.2 Major Issues, Significant Areas of Controversy and Uncertainty, and Issues to be Resolved

The key issues facing decision makers include:

- Consideration of a Preferred Alternative illustrating the desired future for the subarea.
- Type and level of growth to be incentivized in a Planned Action.
- Type and location of new street investments to serve new growth.

1.6 Summary of Impacts and Mitigation Measures

This section summarizes the evaluation of each alternative by environmental topic.

1.6.1 Natural Environment

How did we analyze Natural Environment?

Impacts on the natural environment were identified by evaluating the presence, extent, and type of existing natural resources through a review of available information about the site (e.g., surveys and studies); identifying changes anticipated under each action alternative compared to the No Action Alternative such as housing and employment density, changes in impervious surfaces, and changes in open spaces and habitat; and analyzing anticipated effects of those changes on specific elements of the natural environment in the study area. Sources included a literature review of existing soils, wetlands, streams, vegetation and fish and wildlife.

What impacts did we identify?

Impacts to natural resources in the study area from all alternatives could include impacts to wetlands, streams, buffers, existing vegetation, and fish and wildlife.

Impacts common to all alternatives also include temporary construction-related exposure to soil erosion until building sites are permanently stabilized. These impacts will be minimized by implementation of stormwater requirements related to stormwater pollution prevention at construction sites.

What is different between the alternatives?

Employment increases are anticipated across the Study Area under the No Action Alternative and both Action Alternatives; however, the proposed land uses and level of intensity would differ between each alternative. Substantial differences in impacts to the natural environment between the No Action Alternative and Action Alternatives 1 and 2 could occur based on the level of development activities in or adjacent to critical areas and their buffers. Action Alternative 1 and Action Alternative 2 would both result in more rapid and intense development than the No Action Alternative and have a greater risk of impacts to critical areas. Given that the Preferred Alternative is within the range of growth in Alternative 2 and the housing in Alternative 1, it is anticipated that it would result in more rapid and intense development than the No Action Alternative and have a greater risk of impacts to critical areas.

What are some solutions or mitigation for Natural Environment impacts?

All alternatives are expected to attract development within the study area and within critical areas and/or buffers. The City of Arlington will comply with applicable federal, state, and local

environmental regulations and apply reasonable mitigation measure to reduce significant adverse impacts.

Potential measures to mitigate adverse impacts of specific projects within the Study Area, as well as avoidance and minimization measures that would be part of those projects, will be refined through final design and permitting of each project. During redevelopment or new development under all alternatives, opportunities exist to strategically reduce impervious surfaces, employ low impact development techniques, and restore native vegetation to improve the conditions of the natural environment in these spaces.

The surface water runoff volume from the site is expected to increase under all the alternatives because the proposed development will increase the total area of impervious surfaces. However, development projects will be required to install stormwater facilities that control flow rates and treat stormwater pollutants prior to discharge to receiving water bodies. For redevelopment projects, this would result in an overall improvement (relative to existing conditions) for older developments that do not currently have modern stormwater management facilities.

The relocation of Edgecomb Creek away from the ditches and into a more naturally sinuous channel with a riparian corridor could ensure that sufficient wetland and stream advanced mitigation is incorporated into the selected Action Alternatives to address habitat and critical areas impacts associated with some of the proposed development in the CIC.

With mitigation, what is the ultimate outcome?

Under all proposed alternatives, any redevelopment or new development will require compliance with all applicable regulations to avoid, minimize, or mitigate any impacts to critical areas including wetlands, streams, buffers, and critical aquifer recharge areas. Redevelopment or new development will also need to meet stormwater requirements to protect surface and groundwater from increased flow or water quality impacts. Therefore, no significant unavoidable adverse impacts are anticipated on the natural environment under any of the proposed alternatives.

1.6.2 Cultural Resources

How did we analyze Cultural Resources?

Assessment methods included a review of previous ethnographic, historical, and archaeological investigations in the local area, a records search at on DAHP's Washington Information System for Architectural and Archaeological Records Data (WISAARD) (DAHP 2020a) for known sites in the immediate area, a review of relevant background literature and maps (including General Land Office [GLO], United States Geological Service [USGS], and county atlases), preliminary

field investigations, and the preparation of this report. The Consultant (CRC) contacted cultural resource staff of the Snohomish Tribe, Stillaguamish Indian Tribe, and Tulalip Tribes. This correspondence was not intended to be or replace formal government-to-government consultation. This assessment utilized research design that considered previous studies, the magnitude and nature of the undertaking, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the project, as well as other applicable laws, standards, and guidelines (per 36 CFR 800.4(b)(1)) (DAHP 2020b).

For the purposes of this project, a cultural resource of significance will include any historic property which has been deemed eligible for addition to an historical register, including the National Register of Historic Places (NRHP), the Washington Heritage Register (WHR), or county and city level registers. In general, all archaeological sites are considered resources of significance and should be avoided or mitigated appropriately. Exceptions to this include select historic era archaeological sites which have been deemed ineligible for listing on an historic register based on NRHP criteria for significance.

Based on NRHP assessment criteria developed by the National Park Service (NPS 2002:2), historical significance is conveyed by properties that:

A. Are associated with events that have made a significant contribution to the broad patterns of our history; or
B. Are associated with the lives of persons significant in our past; or
C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
D. Have yielded, or may be likely to yield, information important in prehistory or history.

According to NRHP guidelines, the "essential physical features" of a property must be intact for it to convey its significance, and the resource must retain its integrity, or "the ability of a property to convey its significance" (NPS 2002:44). The seven aspects of integrity are:

1. Location (the place where the historic property was constructed or the place where the historic event occurred);
2. Design (the combination of elements that create the form, plan, space, structure, and style of a property);
3. Setting (the physical environment of a historic property);
4. Materials (the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property);
5. Workmanship (the physical evidence of the crafts of a particular culture or people during any given period of history or prehistory);
6. Feeling (a property's expression of the aesthetic or historic sense of a particular period of time); and

7. Association (the direct link between an important historic event or person and a historic property).

Criteria used for assessment of potential eligibility for the Washington Heritage Register (WHR) are similar to NRHP criteria (DAHP 2019). Criteria to qualify include:

- The resource should have documented historical significance at the local or state level;
- The resource should have a high to medium level of integrity; and
- The resource must be at least 50 years old. If newer, the resource should have documented exceptional significance.

What impacts did we identify?

Proposed work in the study area has the potential to impact known archaeological sites and historic properties of significance. Development under any of the proposed alternatives would presumably result in removal of two archeological sites and two historic properties recorded within the proposed action. Site 45SN720 has been determined not eligible for the NRHP; disturbance to this site would not generate significant impacts. Disturbances to the remaining three resources, including any archaeological test excavations, would require further consultation with DAHP.

Exhibit 11. Cultural Resources Which Meet the Threshold of Significance

Cultural Resource	Type	Register Status	Section
Arlington Municipal Airport – Bore Sighting Range	Historic Property	Determined eligible	16
Arlington Municipal Airport – Small Arms Range	Historic Property	Determined eligible	21
45SN26	Pre-Contact Lithic Scatter	No determination made	22
45SN720	Historic Isolate	Determined not eligible	22

Source: DAHP 2020b; CRC, 2020.

Surface and subsurface investigations indicated substantial surface disturbances throughout the surveyed parcels with disturbance sources varying from repeated clear-cutting of the forest, changes to creek flow and flooding, road cut and construction, utilities installation, and fill zones. The negative shadow of an early to mid-twentieth century house was observed in parcel 31051500202400. The structure appears to have been removed recently and no intact features were observed. A road cut observed in parcel 31051400304200 was of late-twentieth century construction and does not meet the threshold of significance. No previously unrecorded archaeological sites or historic properties were identified through this survey. However, due to

the limited nature of the survey, it remains possible for as-yet unknown potentially significant archaeological or historic sites to be present within the project. It is therefore recommended that DAHP be consulted to determine need for cultural resources surveys for any specific development actions under the proposal.

What is different between the Alternatives?

There is no difference in impact between each of the alternatives for cultural resources. Under all studied Alternatives, additional growth and development will occur in the study area, leading to potential increases in height and bulk of buildings and increased land use intensity, resulting in similar impacts to cultural resources. Given that the Preferred Alternative includes the job growth studied evaluated under Alternative 2 and the housing evaluated under Alternative 1, impacts of the Preferred Alternative are expected to be similar to the studied Alternatives. There is no difference in impact between the alternatives for cultural resources.

What are some solutions or mitigation for Cultural Resources impacts?

Regarding cultural resources, mitigation refers to the outcome of the consultation process when a significant impact to cultural resources is identified. In such situations, mitigation is used to moderate impacts. The following measures could be implemented to help avoid and manage significant impacts to recorded and as-yet unrecorded cultural resources within the Arlington CIC:

- Consult DAHP to determine need for cultural resources surveys for any specific development actions under the proposal. The preliminary field investigations conducted in this study were based on a conceptual design and provide a general history of the study area and limited insight into the subsurface conditions within tested areas that may be developed under the proposal.
- Continue coordination of cultural resource avoidance and mitigation programs for future project-level development through formal government-to-government consultation with the Snohomish Tribe, Stillaguamish Indian Tribe, and Tulalip Tribes. Tribes often are able to provide additional information regarding cultural resources not documented in published literature which can help direct cultural resources investigations and support compliance assessments to ensure that cultural resources are not significantly impacted by development activities.
- Consider partnering with existing businesses or agencies with a strong interest in history, and which likely maintain good historical records of the project location.

Under the Archaeological Sites and Resources Act (RCW 27.53) and the Indian Graves and Records Act (RCW 27.44), a permit from DAHP is required to conduct activities that may alter an archaeological site containing prehistoric objects. This includes importing fill, compaction, use of heavy machinery, tree removal, construction, and any other activities that would change or impact the site. Such a permit would be needed for development in the location of site 45SN26.

Should any potentially significant archaeological or historic sites be encountered in development under the proposal and it is not possible to avoid them, impacts would be generated. These impacts could potentially be minimized through development and implementation of mitigation measures appropriate to the nature and extent of discovered sites. Mitigation measures may include one or more of the following:

- Limiting the magnitude of the proposed work;
- Modifying proposed development through redesign or reorientation to minimize or avoid further impacts to resources;
- Rehabilitation, restoration, or repair of affected resources;
- Preserving and maintaining operations for any involved significant historic structures;
- Archaeological monitoring, testing, or data recovery excavations;
- Documentation of historic elements of the built environment through photographs, drawings and narrative, at the appropriate level based upon Department of Archaeology and Historic Preservation standards (DAHP 2020a).

With mitigation, what is the ultimate outcome?

With mitigation, the ultimate outcome is no significant unavoidable impacts to cultural resources.

1.6.3 Transportation

How did we analyze Transportation?

Transportation impacts were evaluated consistent with the methods of the Arlington Comprehensive Plan 2017 with the exception of the SR 531 corridor. The SR 531 corridor was evaluated using microsimulation to determine intersection delay, corridor travel times and intersection vehicle queues based on coordination with WSDOT. The transportation analysis includes 2040 traffic forecasts using the City of Arlington travel demand mode and an evaluation of street system operations, non-motorized and transit facilities. Transportation impacts of the Action Alternatives were identified through a comparison to the No Action Alternative.

What impacts did we identify?

Transportation demands for all modes would be increased with the Action Alternatives compared to the No Action Alternative. Transit ridership and travel times would increase during the weekday PM peak hours with the alternatives. There are non-motorized facilities to facilitate walking and biking and it is anticipated that as development occurs and transportation improvements are completed additional non-motorized facilities would be constructed. Under

the No Action Alternative and Action Alternatives, 6 of the 12 study intersections are forecast to operate at LOS F during the weekday PM peak hour. Additionally, under the Action Alternatives, eastbound travel times along SR 531 between I-5 and SR 9 are anticipated to decrease and increase in the westbound direction when compared to the No Action Alternative. The evaluation includes improvements already contemplated in the WSDOT's STIP and City's TIP.

What is different between the alternatives?

Action Alternative 2 and the Preferred Alternative are anticipated to generate more weekday PM peak hour trips compared to Action Alternative 1 and the No Action Alternative. As a result of the higher trip generation, it is anticipated that increases in traffic volumes, delays and travel times would be higher with Alternative 2 compared to the No Action Alternative and Alternative 1. For the Preferred Alternative, the trip generation would be between Alternatives 1 and 2, and lower than Alternative 2, because with the job/housing better balanced there are fewer vehicle trips coming to/from the CIC from external uses.

What are some solutions or mitigation for Transportation impacts?

The transportation analysis highlighted the need for the planned but uncertain improvements along SR 531 between 43rd Street NE and 67th Avenue NE. In addition, a traffic signal should be installed at the 67th Avenue NE/NE 188th Street intersection and the I-5/SR 531 Interchange and Smokey Point Blvd/SR 531 intersections should be improved to address future operational issues with the alternatives. The CIC development could contribute a proportional cost share to unfunded improvements.

As development occurs, required frontage improvements would help complete the network and new development would be required to pay traffic impact fees to contribute towards planned improvements.

Other mitigation measures include:

- **Transportation Impact Fees** – The City of Arlington has a traffic impact fee program and developers would be required to pay fees to mitigate transportation impacts.
- **Transportation Demand Management (TDM)** – The City should consider TDM mitigation measures. TDM works to move people out of single occupant vehicles (SOVs) to more sustainable modes like walking, biking, and transit. As part of the alternatives mitigation, it is recommended that businesses be required to implement transportation demand management plans. To support TDM, Community Transit has planned enhancements including a Swift line that would improve service in the study area and help encourage transit use. In addition, as part of the SR 531 corridor improvements multiuse trails are planned

for both sides of the corridor and other roadway improvements and frontage improvements would provide enhancements to sidewalks and bicycle facilities.

- **Intelligent Transportation Systems (ITS)** – ITS improvements such as adaptive signal control systems would improve traffic operations at intersections within the CIC area.
- **Capacity Improvements** – Adding capacity at key intersections that are impacted by the CIC and development in the area could improve LOS and decrease vehicle delays.
- **LOS Policy –** Increasing capacity at intersections and along the roadway system may improve LOS for vehicles; however, it could create impacts for other modes. The City may desire to revisit LOS policies to have a more multimodal LOS that gives priority to other modes and considers connectivity of the pedestrian and bicycle network and/or minimizing barriers for non-auto modes.

With mitigation, what is the ultimate outcome?

The Action Alternatives would allow for additional growth in the study area beyond what would occur with the No Action Alternative. With implementation of the proposed mitigation measures, there would be no significant and unavoidable impacts related solely to the proposed Action Alternatives.

Several intersections operate at LOS F during the weekday PM peak hour along SR 531 with or without the Action Alternatives. These intersections would also have poor operations with mitigation under both the No Action and Action Alternatives conditions. The SR 531 impacts are considered a cumulative significant and unavoidable adverse impact that would occur with or without the action alternatives.

There may be secondary impacts related to widening the SR 531 corridor as part of the proposed mitigation for the action alternatives. Providing the corridor improvements is anticipated to shift traffic volumes and delays may increase at some locations along SR 531. Reducing reliance on auto travel within the study area would help reduce secondary impacts. The mitigation measures identified, and pro-rata cost, would be applicable to the Preferred Alternative identified by the City

1.6.4 Land Use and Aesthetics

How did we analyze Land Use and Aesthetics?

This analysis addresses consistency of the studied alternatives with City and regional plans and policies. This section also addresses physical land use patterns within and surrounding the Study

Area, considering changes in type and intensity of industrial and residential uses. Existing land use pattern conditions are based on field reconnaissance, imagery review, and Snohomish County and City of Arlington parcel data.

What impacts did we identify?

The evaluation reviewed whether alternatives would cause:

- Inconsistency with current plans and policies.
- Differences in activity levels at boundaries of uses likely to result in incompatibilities.
- Change to land use patterns or development intensities that preclude reasonable transitions between areas of less intensive zoning and more intensive zoning.

Policy Consistency: All alternatives are consistent with Growth Management Act (GMA) goals to focus growth and reduce sprawl in the region. All alternatives would support an industrial center per the City's Comprehensive Plan though some would alter the level of jobs, distribution and sectors.

Land Use Patterns in the Center: All studied alternatives include some amount of redevelopment. As redevelopment occurs within the Study Area, there is the potential for localized land use compatibility impacts to occur where newer development is of greater height and intensity than existing development. These compatibility impacts, if they occur, are temporary and will be resolved over time. The extent of these conflicts varies by alternative and can be reduced by the application of existing or new development and industrial design standards.

New growth is expected to occur under all the studied alternatives, although the amount of growth and composition of the mix of land uses will vary by alternative. Activity levels would increase across the Study Area with new businesses, employees and some residents.

Land Use Surrounding the Study Area: Land use compatibility impacts are unlikely to occur to the south, southwest or north of the Study Area due to physical barriers, topography, or the buffer requirements of the Arlington Municipal Airport.

What is different between the alternatives?

Policy Consistency: The No Action Alternative and the Action Alternatives would continue to meet GMA goals by identifying the CIC as a manufacturing industrial center which can focus growth and avoid sprawl in the region. However, with no further investments the area may be less likely to redevelop as envisioned in the AMMIC Subarea Plan under the No Action Alternative. Given its relatively lower employment capacity, the No Action Alternative is also less likely to assist the City in meeting its growth allocations for 2035, whereas the Action Alternatives could assist with that objective.

Land Use Patterns in the Center: Overall there are no differences in allowed heights under the No Action Alternative or the Action Alternatives. Alternative 1 and the Preferred Alternative would distribute high-density employment growth on sites identified as priority sites in the AMMIC subarea plan while the No Action Alternative and Alternative 2 are anticipated to continue existing patterns of growth.

The greatest employment growth is associated with Alternative 2 and only Alternative 1 and the Preferred Alternative anticipate a slight increase in residential growth. The No Action Alternative has the lowest growth anticipated of the three alternatives. There are proposed industrial design standards for development compatibility.

Land Use Surrounding the Study Area: Compatibility conflicts could occur due to changes in the mix of land use and changes related to the increased intensity and height of new development. Building height increases on the northwest side of the Study Area, west of 47th Ave NE could place future buildings of up to 50 feet in this area. However, these maximum heights are not likely since much of the land is also restricted by FAA regulations. Within the Study Area there is limited potential for land use conflicts under the No Action Alternative and Action Alternatives since new development is not anticipated to be of greater height or intensity compared to existing development. Given that the Preferred Alternative includes the jobs of Alternative 2 and the sectoral distribution of Alternative 1, no impacts are anticipated.

What are some solutions or mitigation for Land Use and Aesthetics impacts?

- The manufacturing industrial center is intended to take the majority of the city's projected employment growth. Minor changes to the Comprehensive Plan would be incorporated into the implementation of the Action Alternatives to ensure full consistency between the Comprehensive Plan and the Subarea Plan.
- Careful attention in the creation of industrial development-specific design standards could limit any potential land use compatibility conflicts between the Study Area and in adjacent areas.

With mitigation, what is the ultimate outcome?

Under all studied alternatives, additional growth and development will occur in the Study Area, leading to increases in height and bulk of buildings and increased land use intensity. This transition is unavoidable but is not considered significant or adverse within an urban area designated as a Manufacturing Industrial Center in the Comprehensive Plan.

Future growth is likely to create temporary or localized land use compatibility issues as development occurs. The potential impacts related to these changes may differ in intensity and

location in each of the alternatives. However, with existing and new development regulations, and design guidelines, no significant adverse impacts are anticipated.

1.6.5 Utilities and Public Services

How did we analyze Utilities and Public Services?

Utilities and public services were analyzed by considering how the proposed alternatives, including changes in population, dwelling units, and jobs would affect water demand, wastewater generation, and the quantity of stormwater runoff as well as police, fire, parks, and schools. Stormwater quality is discussed in the Natural Environment section.

What impacts did we identify?

Water, Wastewater, and Stormwater: Increased demand for drinking water, increased wastewater generation, and changes in surfaces that generate the need for additional stormwater infrastructure.

Police: Each alternative would increase employee population but increases in industrial jobs are anticipated to have little impact on the City's adopted LOS standards for police services. While the population within the CIC is anticipated to increase under Alternative 1 this increase is small enough that significant impacts to crime rate, crime clearance rate, response time, or events per officer that would constitute the need to examine police staffing levels is not anticipated.

Fire: Additional employment in the area would increase daytime population and potentially increase call volumes as well. The City is in the process of constructing a new, two story fire station (Station 48), which will likely ensure response times are within the adopted LOS. The new facility is being constructed with commercial and industrial grade infrastructure for water supply as well.

Parks: Employees under all alternatives could use parks and recreation facilities in the city.

Schools: Alternative 2 and the No Action Alternative would not affect school generation.

What is different between the alternatives?

Utilities: Demand for water and generation of wastewater are scalable with population and jobs. As a result, all the alternatives increase water demand and wastewater generation. The Action Alternatives include larger increases in jobs than the No Action Alternative, so the Action Alternatives would result in larger increases in water demand and wastewater generation.

Alternative 1 includes some additional population, which are not included in the No Action Alternative and Alternative 2. Alternative 2 includes more new jobs than the No Action Alternative or Alternative 1. Base on application of planning level estimates of water demand and wastewater generation per person and per employee, Alternative 2 is expected to result in the greatest increase in water demand and wastewater generation; however, water use can vary significantly by industry.

There is no substantial difference between the No Action Alterative, Alternative 1, or Alternative 2, from the standpoint of stormwater flow generation and ability of the stormwater system to convey the flow.

Public Services:

Police and Fire: All alternatives increase demand for police and fire services with No Action the least and Alternative 1 and the Preferred Alternative the most.

Parks: Under Alternative 1 and the Preferred Alternative, there could be aa deficit 5.4 acres of community parks based on expected population growth.

Schools: The Preferred Alternative and Alternative 1 are expected to generate 238 students.

What are some solutions or mitigation for Utilities and Public Services impacts?

- The Arlington Comprehensive Plan addresses levels of service and capital improvements for fire, police, and parks. This is updated periodically with the Comprehensive Plan.
- The Arlington Municipal Code includes common open space standards for new residential developments.
- The City could incentivize or require participation in regional stormwater when concepts are developed to help spur development and water quality and stormwater management.
- The City could employ crime prevention through environmental design standards through its industrial design guidelines.
- Park and recreation improvements are proposed with each action alternative such as in association with the relocation of Edgecomb Creek.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts are anticipated for the water, wastewater, and stormwater utilities under any of the alternatives. The City has developed comprehensive plans for all three utilities and these plans are updated regularly to reflect system needs. The capital project needs to support redevelopment of the Study Area are similar in scale to projects that

the utilities execute on a regular basis. The costs of these improvements would be partially offset by general facility connection charges and rates for service.

No significant unavoidable adverse impacts are anticipated for fire, police, schools, and parks and recreation under any of the alternatives. With regular capital facility planning and implementation of mitigation measures no significant unavoidable adverse impacts are anticipated.

2.0 Preferred Alternative

2.1 Introduction and Purpose

The proposal includes the adoption of a Planned Action consistent with RCW 43.21c.440 and associated Comprehensive Plan amendments to address necessary capital investments that study implementation of the Arlington-Marysville Manufacturing Industrial Center (AMMIC) Subarea Plan and associated implementing policies/regulatory amendments. Opportunity sites identified in the subarea plan are further evaluated for potential job growth and mix that meet the subarea plan vision, goals, and intent for jobs in aerospace, robotics, advanced manufacturing, food processing, maritime, wood products and mass timber. Job increases of nearly 5,000 to 9,000 or more are studied representing potential capacity under the current Comprehensive Plan (No Action) and under two Action Alternatives that vary capital investments and any necessary policy or code amendments that encourage added land use and growth consistent with the Subarea Plan. Action alternatives also consider options for Edgecomb Creek realignment and restoration.

2.2 Description of the Study Area

The study area is the Arlington portion of the Cascade Industrial Center. Formerly known as the AMMIC the CIC straddles the cities of Arlington and Marysville. The Arlington portion of this center encompasses about 2,291 acres surrounding and including the Arlington Municipal Airport (AWO).

2.3 Process

2.3.1 Planning Process

The Arlington CIC planning process reflects the following phases.

- **Scoping** – Conduct a scoping process to obtain comments on the environmental topics and alternatives to be studied.
- **Draft Plan and EIS** – Prepare a Draft EIS to test alternatives.
- **Preferred Alternative and Final Plan** – Considering the Draft EIS and public input, engage stakeholders and the community to create a Preferred Alternative. Develop a Final EIS incorporating the Preferred Alternative.

2.3.2 Public Comment Opportunities

AMMIC Subarea Plan Engagement Efforts

Public participation was an important aspect of the subarea planning process; feedback informed various stages of Plan development, from visioning, plan alternatives, goals and policies. Engagement activities included:

Stakeholder Interviews

In September 2017, the project team conducted eight interviews with individual stakeholders, property owners, and business owners in the MIC. The interviews provided insights into the needs and concerns in the area as well as an opportunity to introduce and connect interviewees to the upcoming planning process.

Online Community Survey

In March 2018, an online survey was distributed to residents in both cities as well as business owners and employees in the MIC. This was a way to both increase awareness of the Subarea Planning process and gather input from people who could not attend in-person meetings. A total of eighty-four respondents provided feedback through the online survey. Their input underscored the needs and concerns raised through interviews.

Vision Public Workshop

More than 80 property owners and community members attended the AMMIC Subarea Plan kickoff workshop on April 4, 2018 to learn about the project and provide input. The consultant team set up project boards including informational and interactive boards to receive public input. The public had opportunities to provide input through three ways:

- An open house where the consultant team was at hand to provide information and answer.

- questions. There were also boards where points of interest or ideas for future improvements could be noted.
- A facilitated large group discussion.
- Three smaller group discussions, which involved a facilitated conversation and mapping activity.

Advisory Committee Meetings

In addition to these engagement activities, the Cities created an advisory group to review technical information, provide input and recommendations, and works collectively to refine components of the Subarea Plan. This group was comprised of senior technical staff from regional agencies, and AMMIC business and property owners. The advisory group met three times over the course of preparation of the Subarea Plan to provide input on substantive aspects of plan development.

Draft Plan Public Workshop

More than 80 property owners and community members attended the AMMIC Subarea Plan workshop on October 17, 2018 to provide input on the draft plan concepts. The consultant team set up project boards including informational and interactive boards to receive public input. The meeting included an open house, presentation, question and answer session and time for one-on-one discussion with City staff and consultants. Attendees were encouraged to provide input related to strengths and weaknesses in the Plan.

Legislative Process

The AMMIC Subarea Plan was adopted by Council in December 2018 following a Planning Commission hearing and recommendation.

Recent Public Engagement Efforts

To date public comment opportunities have included the activities described below.

EIS Scoping – April 2020. A public scoping notice was issued to a mailing list and posted online to receive comments on issues that should be studied in the EIS. The scoping period extended from April 8 to April 29, 2020.

Draft EIS Comment Period – October 2020. With the publication of the Draft EIS, a 30-day comment period was been established from October 1, 2020 to October 30, 2020. A public meeting is planned in this period to assist with development of a Preferred Alternative.

The Planning Commission held a public hearing on the Draft Comprehensive Plan Amendments and Planned Action. Their recommendations have been forwarded to the City Council for a public hearing and deliberation. The schedule has been included at the City of Arlington

website: http://www.arlingtonwa.gov/310/Public-Notices.

2.4 Objectives and Alternatives

2.4.1 Proposal Objectives

SEPA requires a statement of objectives that address the purpose and need for the proposal. The proposal objectives for the EEC are based on the AMMIC Subarea Plan Guiding Principles and objectives for coordinated planning and investments.

Guiding Principles

Coordinated investments and regional impact.

Coordinated investments within the AMMIC allow it to function as a regional center with a focus on production, especially advanced manufacturing. AMMIC businesses leverage and support manufacturing industrial activity across the region, including activities at Paine Field, Port of Everett and Port of Seattle Tacoma. In addition to Arlington and Marysville, Snohomish County and the central Puget Sound region benefit from development in the AMMIC through its positive impact on regional economic health and competitiveness.

Economic diversity.

The presence of a variety of economic activities allows cities and regions to be resilient against changing economic trends and cycles. The AMMIC provides opportunities for a broad range of economic activities and industries. Employment-rich production businesses contribute to job growth in the Center. These include business in advanced manufacturing, aerospace, food processing, mass timber, as well as broader manufacturing activity. AMMIC businesses also engage in repair and distribution to support and leverage manufacturing and industrial activity.

Building on and strengthening distinctive competitive advantages.

The AMMIC enjoys a distinct competitive advantage in the region for manufacturing, especially related to aerospace. In addition to a diverse range of firms, the AMMIC builds on this recognized business and industry clusters to leverage its comparative advantage and agglomeration benefits.

Economic activity and opportunity.

AMMIC's industrial businesses create jobs that pay good wages and are accessible to people with all levels of education. Partnerships with local community colleges, high schools, as well as

other local and regional institutions ensure residents have access to training opportunities and businesses have access to a trained workforce. The presence of affordable housing in both Arlington and Marysville support the local workforce and economy.

Accessibility and connectivity.

Planned transportation improvements in and around the AMMIC have increased capacity, reduced conflicts with the railroad, and improved freight connectivity. AMMIC employees can access readily available public transit, including the future SWIFT BRT on Smokey Point Blvd. The Cities of Arlington and Marysville, local businesses and Community Transit, have partnered to provide innovative micro-transit or feeder routes that serve industrial facilities and provide good connections to transit and to park and ride facilities. Nonmotorized facilities within the AMMIC have improved and employees and residents enjoy easy access to the Arlington Airport Trail and the Centennial Trail.

High quality design.

Industrial development in the MIC is consistent with design standards to ensure quality development that benefits property owners and the Cities.

Sustainability.

Development in the AMMIC is consistent with standards for modern industrial development and environmental requirements. Where feasible, industrial facilities integrate low impact development concepts, including rain gardens, pervious pavements, and green roofs. Industrial development also utilizes alternative energy sources such as wind and solar power.

2.4.2 Alternatives

No Action Alternative

The No Action Alternative would continue the current Comprehensive Plan designation and Zoning for the study area. No changes to the Comprehensive Plan to addressed added infrastructure investments in the Capital Facility Plan or other amendments necessary to implement Subarea Plan strategies for CIC opportunity sites in Arlington would be addressed. No Planned Action would be adopted to facilitate environmental review of new development or redevelopment.

The current intent for the Arlington portion of the CIC is to serve as a manufacturing and industrial employment center, with a diverse range of industrial activities that provide employment opportunities for residents in Snohomish County and the region.

The majority (~80%) of the Study Area is currently zoned for industrial/aviation uses across Aviation Flightline, General Industrial, and Light Industrial zoning districts. See Exhibit 13 and Exhibit 14. The No Action Alternative would allow for net growth rounded to 4,824 jobs with no changes to housing. See Exhibit 12. The No Action Alternative plans assume current employment density and sectoral distribution with the existing 4,969 jobs maintained and increased; however, there are no incentives or investments planned.

Exhibit 12. No Action Alternative: Current and Planned Growth

	Population	Dwellings	Jobs
Existing	890	332	4,969
Planned Growth (net) 2040	0	0	4,824
Total	**890**	**216**	**9,793**

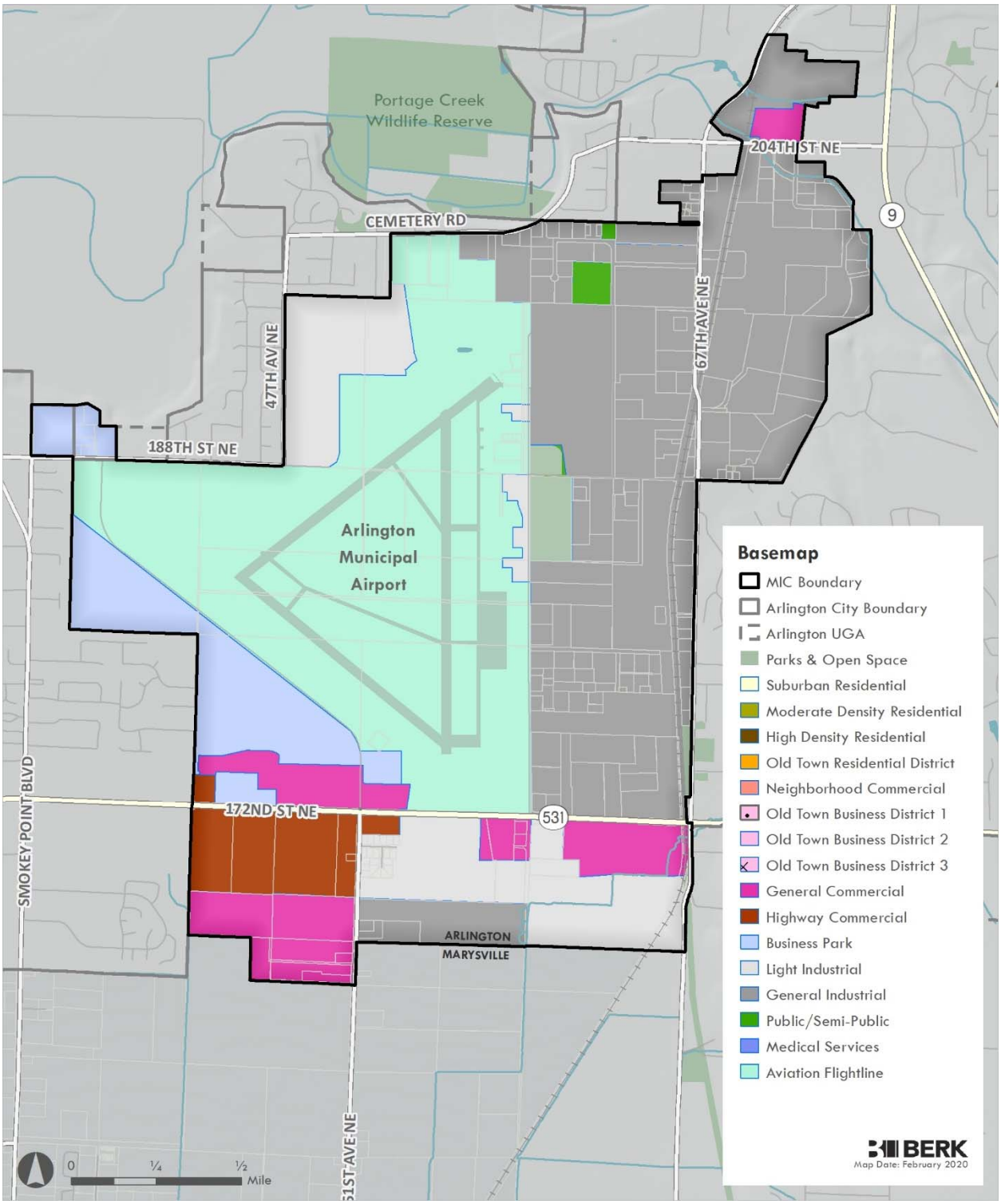
Source: City of Arlington, 2020; PSRC 2020; Transpo Group, 2020; BERK, 2020.

Exhibit 13. Study Area Zoning by Acreage, 2020

Zone	Acres
General Industrial	862
Aviation Flightline	737
Light Industrial	237
Business Park	166
General Commercial	165
Highway Commercial	88
Public/Semi Public	36
Total	**2,291**

Source: City of Arlington, 2020; Snohomish County, 2020; BERK, 2020.

Exhibit 14. Current Zoning Within Study Area



Source: City of Arlington, 2020; Snohomish County, 2020; BERK, 2020.

Alternative 1: Cascade Center Vision Job Sectors

Alternative 1 is based on the vision for job growth, geographical distribution, and sector mix of the Arlington-Marysville Manufacturing Industrial Center (AMMIC) Subarea Plan. Higher density employment is anticipated on sites identified as "opportunity sites" in the Subarea Plan and lower density development (at existing employment density) is anticipated on the remaining sites with development capacity. High density employment is anticipated in sectors identified in the Subarea Plan such as aerospace, robotics, advanced manufacturing, food processing, maritime, wood products and mass timber manufacturing. The greatest increases in employment are anticipated on undeveloped, shovel-ready land at the Airport Business Park site immediately west of the Arlington Municipal Airport. Slightly smaller increases are anticipated on the site north of the airport at 47th Ave NE, on the parcel at the intersection of 67th Ave NE and 199th St NE, on the site east of 59th Ave and south of 172nd Avenue NE, and on the site east of the airport and west of 67th Ave NE. Employment uses would be designed to take advantage of the area's natural features, including a relocated Edgecomb Creek. In addition to high density industrial or manufacturing employment, workforce training, incubators and similar entrepreneurial support facilities would be newly established on the Airport Business Park site immediately west of the airport. This would support the industry sectors identified in the Subarea Plan especially food processing and seafood industries and robotics. Along with diverse industrial development, future development under this alternative is anticipated to include a small amount of new residential development that is compatible with the industrial land use mix of the center. See Exhibit 16. This alternative supports net increases of employment of 6,625 jobs, 516 dwellings, and 1,383 residents. See Exhibit 15.

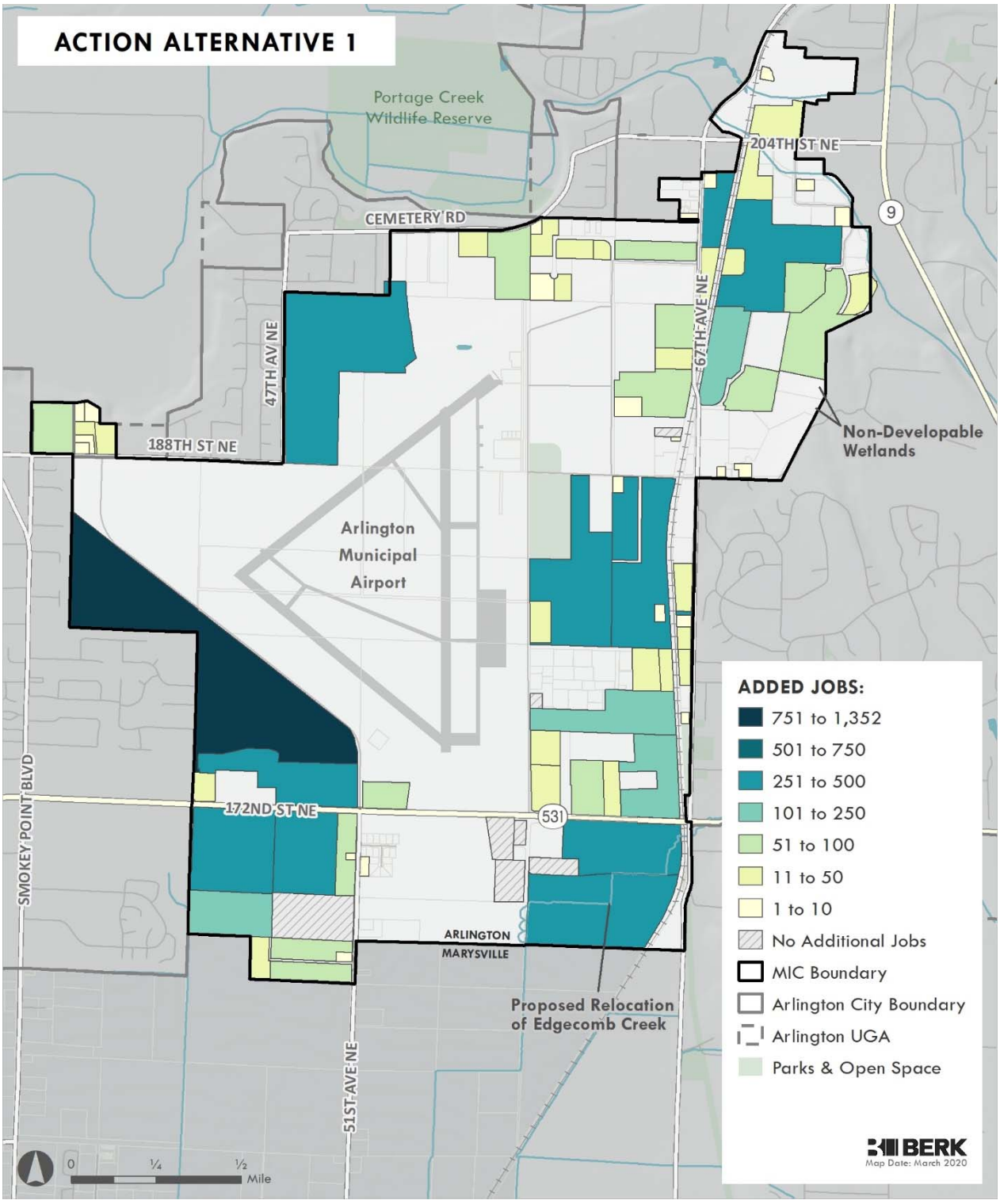
Exhibit 15. Alternative 1, Current and Planned Growth

	Existing	Alternative 1: 2040	Net Change*
Population	890	2,273	1,383
Dwellings	332	848	516
Jobs	4,969	11,594	8,844

*Net change compared to existing.
Source; PSRC 2020; Transpo Group 2020; BERK, 2020.

Alternative 1 would implement the AMMIC Subarea Plan and include Comprehensive Plan amendments to address necessary capital investments as well as zoning changes that increase Light Industrial and Business Park zoning and decrease General Commercial and Highway Commercial zoning. See Exhibit 16. This alternative will adopt a Planned Action Ordinance to help facilitate environmental review of new development and redevelopment.

Exhibit 16. Alternative 1: Cascade Center Vision Job Sectors



Source: BERK, 2020.

Alternative 2: High Growth Trend Sectors

Alternative 2 anticipates a high growth scenario for employment within the center. Employment increases are anticipated across the center on all sites with development capacity. See Exhibit 18. The greatest increases in employment are anticipated on undeveloped, shovel-ready land at the Airport Business Park site immediately west of the Arlington Municipal Airport and the site north of the airport at 47th Ave NE. Slightly smaller increases of employment are anticipated on the parcel at the intersection of 67th Ave NE and 199th St NE, on the site east of 59th Ave and south of 172nd Ave NE, and on the site east of the airport and west of 67th Ave NE. Similar to Alternative 1, employment uses would be designed to take advantage of the area's natural features, including a relocated Edgecomb Creek. Areas of substantial development, besides the Airport Business Park, will be in the southwest quadrant of 51st Ave/172nd St and the southwest quadrant of 67th Ave/172nd

The sectoral mix of employment under this alternative is anticipated to reflect current patterns and countywide trends. Current employment patterns show less than half of the total jobs in Manufacturing and close to 20% of jobs in Warehousing, Transportation and Utilities. Workforce training, incubators and similar entrepreneurial support facilities or residential development suitable to industrial districts are not anticipated in this alternative. Without a focus on manufacturing sectors identified in the Subarea Plan, and supportive investments in workforce training and education, this pattern is expected to continue. See Exhibit 18.

This alternative supports net increases of employment of 8,844 jobs with no changes to dwellings or population compared to existing conditions and the No Action Alternative. See Exhibit 17.

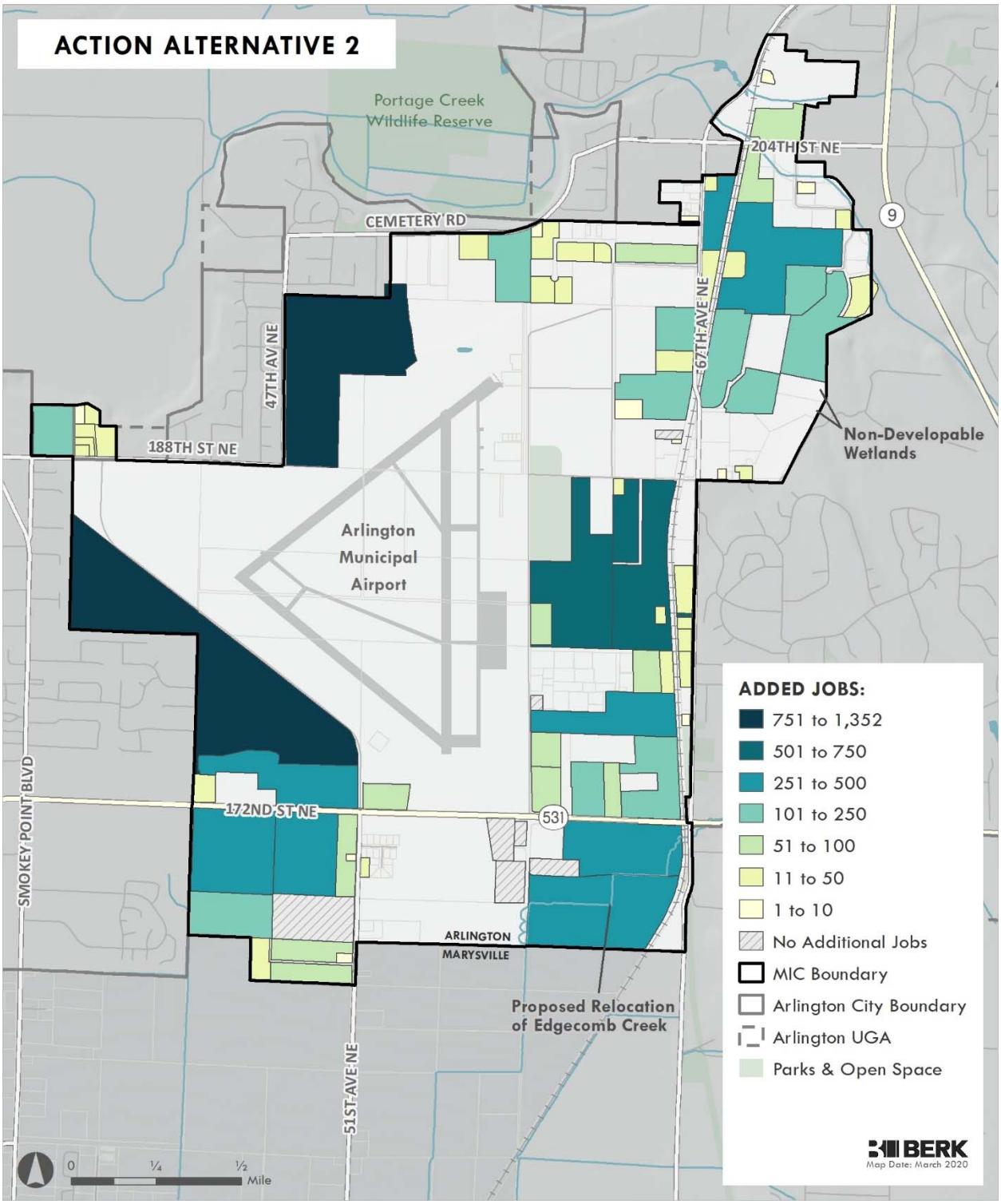
Exhibit 17. Alternative 2, Current and Planned Growth

	Existing	Alternative 2: 2040	Net Change*
Population	890	890	0
Dwellings	332	332	0
Jobs	4,969	13,813	8,844

*Net change compared to existing.
Source; PSRC 2020; Transpo Group 2020; BERK, 2020.

Alternative 2 would adopt a Comprehensive Plan capital facility plan amendment regarding infrastructure investments necessary to support the study area, and a Planned Action Ordinance to help guide future development and facilitate environmental review of new development and redevelopment.

Exhibit 18. Alternative 2: High Growth Trend Sectors



Source: BERK, 2020.

Preferred Alternative

The Preferred Alternative provides for the high growth employment of Alternative 2 with the Alternative 1 based on the vision geographical distribution, and sector mix of the AMMIC Subarea Plan. High density employment is anticipated in sectors identified in the Subarea Plan such as aerospace, advanced manufacturing, food processing, maritime, wood products and mass timber manufacturing. A small amount of residential development and workforce training facilities are also anticipated. Similar to the Action Alternatives, Edgecomb Creek is anticipated to be relocated under the Preferred Alternative.

Exhibit 19. Preferred Alternative, Current and Planned Growth

	Existing	Preferred Alternative: 2040	Net Change*
Population	890	2,273	1,383
Dwellings	332	848	516
Jobs	4,969	13,813	8,844

*Net change compared to existing.
Source; PSRC 2020; Transpo Group 2020; BERK, 2020.

2.4.3 Alternative Comparisons

Major features of the alternatives are described and compared below.

Land Use

Each alternative proposes a different mix of employment sectors within existing land use designations, particularly Alternative 1. See Exhibit 20.

Exhibit 20. Alternative Parcel Acres by Zoning District

Designation	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
General Industrial	861.86	861.86	861.86	861.86
Aviation Flightline	737.02	737.02	737.02	737.02
Light Industrial	236.68	312.52	236.68	312.52
Business Park	165.57	193.01	165.57	193.01
General Commercial	165.23	63.44	165.23	63.44
Highway Commercial	88.42	86.93	88.42	86.93

Designation	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Public/Semi-Public	35.98	35.98	35.98	35.98
Grand Total	**2,290.78**	**2,290.78**	**2,290.78**	**2,290.78**

Source: BERK, 2020.

Growth

Each alternative's projected growth is listed in **Error! Reference source not found.**. Alternative 2 has the greatest total employment and would retain and increase jobs. It would not add any new dwellings compared to the No Action Alternative. Alternative 1 would increase employment by 6,625, or 1,801 jobs more than the No Action Alternative and 2,219 less than Alternative 2. Alternative 1 would support the vision, intent and sectoral mix outlined in the Subarea Plan and accommodate supportive uses such as educational/workforce training facilities and business incubators. Alternative 1 would also add a small number of dwellings such as live/work units suitable in industrial districts compared to the No Action Alternative and Alternative 2. The Preferred Alternative would have the jobs of Alternative 2, the housing in Alternative 1 and the sectoral and geographic distribution of Alternative 1.

Exhibit 21. Alternative Comparison of Total and Net Growth

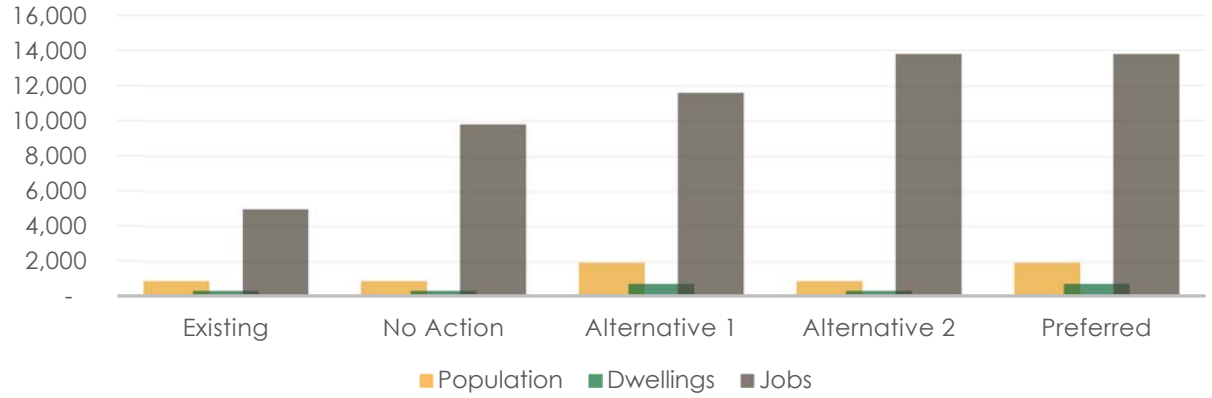
	Existing	No Action	Net Change*	Alternative 1	Net Change*	Alternative 2	Net Change*	Preferred	Net Change*
Population	890	890	0	2,273	1,383	890	0	2,273	1,383
Dwellings	332	332	0	848	516	332	0	848	516
Jobs	4,969	9,793	4,824	11,594	6,625	13,813	8,844	13,813	8,844

*Net change compared to existing.
Source; PSRC 2020; Transpo Group 2020; BERK, 2020.

The total population, housing, and jobs for each alternative is illustrated in Exhibit 22. As noted above, Alternative 2 has the greatest total jobs with sectors similar to current conditions and trends whereas Alternative 1 grows jobs compared to No Action Alternative and has a different sectoral mix than both the No Action and Alternative 2; Alternative 1 has a smaller number of total jobs than Alternative 2 and includes a small share of housing. Given the location of the CIC, the No Action Alternative would likely result in a mix of industrial and commercial employment sectors. Though the No Action Alternative has capacity for jobs, without further investment there

are not likely to be the land use mix or employment sectors envisioned in the Subarea Plan. As noted above, the Preferred Alternative has the job growth of Alternative 2 and the housing increase of Alternative 1.

Exhibit 22. Total Population, Dwellings, and Jobs 2040 by Alternative



Source: PSRC, 2020; Transpo Group, 2020: BERK, 2020.

Action Alternative 2 and the Preferred Alternative are anticipated to generate more weekday PM peak hour trips compared to Action Alternative 1 and the No Action Alternative. As a result of the higher trip generation, it is anticipated that increases in traffic volumes, delays and travel times would be higher with Alternative 2 compared to the No Action Alternative and Alternative 1. For the Preferred Alternative, the trip generation would be between Alternatives 1 and 2, and lower than Alternative 2, because with the job/housing better balanced there are fewer vehicle trips coming to/from the CIC from external uses. See Exhibit 23.

Exhibit 23. Trip Generation 2040 of Preferred Alternative

Weekday PM Peak Hour Trip Generation			
	In	**Out**	**Total**
No Action	1,687	4,557	6,244
Preferred Alternative	2,225	5,680	7,905
Net New Trips	**538**	**1,123**	**1,661**

Source: Transpo Group, 2020: BERK, 2020.

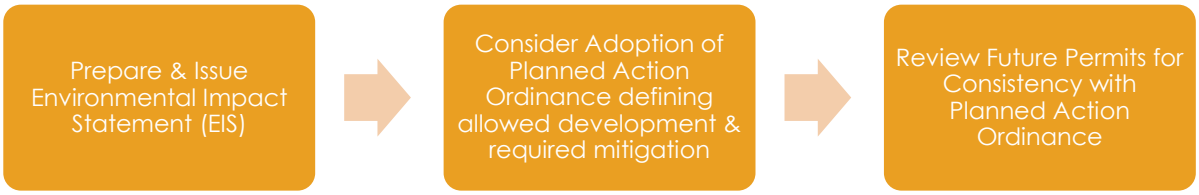
Planned Actions

Action Alternatives 1 and 2 and the Preferred Alternative propose the designation of a Planned Action in the Study Area, as authorized under SEPA (RCW 43.21C.440 and WAC 197-11-164

through -172). Planned actions provide more detailed environmental analysis during the area-wide planning phase, rather than during the permit review process. Future projects in the Study Area that develop under the designated Planned Action will not require SEPA threshold determinations at the time of permit application if they are certified as consistent with the type of development, growth and traffic assumptions, and mitigation measures studied in the EIS. Such projects are still required to comply with adopted laws and regulations and would undergo review pursuant to the City's adopted land use and building permit procedures.

See Exhibit 24 for a summary of the process. A draft Planned Action Ordinance is included in Appendix B.

Exhibit 24. Planned Action Process



Source: BERK, 2020.

Comparison of Features

Based on the description of alternatives in this chapter, Exhibit 25 compares the features of the alternatives in terms of changes to plans and regulations and infrastructure investments.

Exhibit 25. Alternative Features

Feature	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Plans and Regulations				
Continue Current Plans and Regulations	X		X	
Implements Subarea Plan including changes to Capital Facilities Element to Support Growth		X	X	X
Implements Changes to Development Regulations Consistent with Subarea Plan		X		X
Planned Action Ordinance		X	X	X
Investments				
Current Transportation Investments	X	X	X	X
Added Multimodal Transportation Investments to support Job Types		X	X	X

Feature	No Action Alternative	Alternative 1	Alternative 2	Preferred Alternative
Add trail in the buffer of relocated Edgecomb creek		X	X	X

Source: BERK, 2020.

Proposed design standards to implement the Preferred Alternative is anticipated to include:

Exhibit 26. Proposed Industrial Design Standards

Feature	
Site Context	▪ Integration of the natural environment ▪ Circulation ▪ Site Character ▪ Edges and adjacent areas ▪ Security and lighting ▪ Landscaping ▪ Screening ▪ Service facilities ▪ Parking
Building Design	▪ Building form and scale ▪ Building orientation ▪ Building materials
Specific Development Types	▪ Industrial complexes and campus industrial ▪ Incubator industrial ▪ Advanced manufacturing facilities ▪ Food processing facilities ▪ Maritime facilities ▪ Wood products manufacturing facilities ▪ Industrial service facilities ▪ Industrial live/work facilities

Source: BERK, 2020.

2.5 Benefits and Disadvantages of Delaying the Proposed Action

Delaying the proposed action would limit the overall amount of development in the Arlington portion of the CIC that could otherwise occur with the proposal by changing development regulations or approving a Planned Action Ordinance. Delaying the proposal would also delay any increased demand for public services or utilities associated with development. Delaying the proposal would delay improvements of water quality accompanying redevelopment and green infrastructure investments.

If the proposal is not adopted, the area would continue with the established industrial land use designation, though with a different employment sector mix than under the proposed action.

3.0 Responses to Comments and Clarifications and Corrections to Draft EIS

3.1 Comment Opportunities

During the Draft EIS comment period, written comments were received from the Washington State Department of Transportation. The issues raised are numbered on the letter and are followed by correspondingly numbered responses. Comments that state preferences on alternatives or other matters are acknowledged with a response that the comment is noted and forwarded to City decision makers. Comments that address methods, analysis results, mitigation, or other matters are provided a response. The City also held an online community meeting during the comment period; there was one attendee but no commenter. The meeting was posted on You Tube.

Exhibit 27. Comment and Response Matrix

Comment Summary	Potential Approach in Preferred Alternative or Final EIS
Letter 1 (Sent via email) WSDOT 10/28/20	
Summary Comment 1-1 Thank you for the opportunity to provide comments on the Cascade Industrial Center Draft EIS. The Arlington CIC is an area encompassing 2300 acres adjacent to one of the most congested segments of I-5. Also currently congested in proximity to the	Comment noted. Thank you for the comment.

Comment Summary	Potential Approach in Preferred Alternative or Final EIS
subarea are State Routes (SR) 9, SR 530, and SR 531. Based on the draft EIS, Alternative 2 could generate up to 8,844 new jobs, almost three times the existing. WSDOT therefore expects significant adverse environmental impacts to transportation will occur on I-5 and SR 9, SR 530, and SR 531. We appreciate the opportunity to collaborate with you and your team during the EIS scoping period. Also, we appreciate the opportunity to review the draft transportation section ahead of the issuance of the DEIS. Thank you for addressing some of our earlier comments. However, we are concerned that several of our comments remain unaddressed and are summarized below:	
Summary Comment 1-2 On page 3-55 of the Arlington DEIS it is stated: "The SimTraffic microsimulation model was calibrated to the traffic operation condition on a typical weekday based on Google Map Traffic." On page 3-55 and page 3-56, it is mentioned: "Transpo adjusted the SimTraffic settings to be consistent with the vehicle queuing/ congestion patterns from the Google Traffic Map historical data." However, no supporting information is provided nor a description of the settings that were adjusted. This is information that is needed to support the findings that are presented.	**Response 1-2** 1.As described in the DEIS on pages 3-55 and 3-56, the SimTraffic was calibrated based on queuing and congestion patterns shown in Google Traffic Map historical data. The settings adjusted in SimTraffic model to calibrate it to historical data included: ▪ Taper lengths ▪ Ideal sat flow rate ▪ Mandatory distance ▪ Positioning distance ▪ Mandatory distance 2 ▪ Positioning distance 2 ▪ Headway factor These SimTraffic settings were incrementally adjusted until the existing conditions simulation and results matched the historical traffic queuing and congestion.
Summary Comment 1-3 Synchro is not the appropriate analysis tool for roundabout operation, operational evaluation of any roundabout intersection would need to be performed in Sidra. WSDOT was provided Sidra reports for the existing SR 9 / SR 531 roundabout intersection, but not for the 4 intersections that will be improved as part of the WSDOT SR 531 – 43rd to 67th project. Synchro results for the mitigated scenario (with	**Response 1-3** As described in the comment, Sidra is the appropriate analysis tool for roundabout controlled intersections. Transpo used Sidra to evaluate intersection operations at roundabout controlled intersections. The analysis of mitigated conditions was based on future 2040 Synchro models provided by WSDOT for the SR 531 corridor. At the time the Arlington CIC DEIS traffic analysis was performed, WSDOT was evaluating traffic control along the SR 531 corridor and had not determined that roundabout control was the preferred improvement. The Arlington CIC DEIS analysis of mitigated conditions assumed traffic signal control at the SR 531 intersections with 43rd, 51st, 59th and 67th Avenues NE based on the Synchro models provided by WSDOT. The DEIS describes that the Alternatives would require SR 531 corridor improvements to mitigate the

Comment Summary	Potential Approach in Preferred Alternative or Final EIS
roundabouts) are not acceptable. The 2040 Action Alternative 2 "mitigated" Synchro model shows traffic signals at 43rd, 51st, 59th and 67th rather than roundabouts.	impacts of the Alternatives. Page 3-79 of the DEIS states "The analysis assumes maintaining traffic signal control at the study intersections; however, roundabout control could be provided. Specific improvements at intersections will require a detailed intersection control evaluation (ICE) as part of the WSDOT design process."
Summary Comment 1-4 Some methodology to compare corridor-wide operation, when there is a combination of signals, stop control and roundabouts, needs to be developed. Similar to above, the Synchro and SimTraffic output do not accurately reflect the expected future traffic controls at 4 intersections.	**Response 1-4** See response to comment 1-3.
Comment 1-4 Potential impacts to the I-5 mainline need to be evaluated. Specifically, we request a review of potential queuing issues that might impact the I-5 mainline. This could be reported in terms of expected 95th % queue lengths, compared to available storage. We commend the City for its commitment through this project to create a multimodal environment in order to reduce single occupancy vehicles (SOVs). In addition, the city's proposal will add workforce housing to the area, which can result in employees living in closer proximity to their jobs, which can reduce trip. Distances improve air quality and quality of life. These measures will likely help reduce travel in I-5 and increase use of non-auto modes. However, a review of potential queuing issues that might impact the I-5 mainline is needed for a better understanding of the potential impacts.	**Response 1-4** Pages 3-71 and 3-78 of the DEIS describe the potential impacts to the I-5 mainline with a discussion of potential queuing at the I-5/SR 531 interchange off-ramps. The Arlington CIC DEIS shows that the vehicle queues at the off-ramps are not anticipated to back-up onto the I-5 mainline with the Alternatives. Table 1 below provides a summary of the I-5/SR 531 off-ramp weekday PM peak hour vehicle queuing for the No Action and Action Alternative 2 based on the analysis shown in the DEIS.

Table 1. I-5/SR 531 Off-Ramp Weekday PM Peak Hour Queuing Summary

Ramp/Direction	Approximate Storage Length[1]	95th Percentile Vehicle Queue[2]	
		No Action Alternative	Alternative 2
Southbound Off-Ramp			
Southbound Left	395 feet	275 feet	250 feet
Southbound Through/Left	1,690 feet	1,025 feet	1,025 feet
Southbound Right	395 feet	575 feet	550 feet
Northbound Off-Ramp			
Northbound Left	395 feet	375 feet	375 feet
Northbound Through/Left	1,800 feet	1,550 feet	1,550 feet
Northbound Right	1,800 feet	1,600 feet	1,650 feet

1. Storage length is measured from Google aerial, 2020.
2. 95th Percentile vehicle queues are rounded to the nearest 25-feet.

As shown in Table 1, all of the vehicle queues are accommodated within the available storage length under the No Action and Action Alternative 2 except the I-5/SR 531 Southbound Off-Ramp right-turn. The southbound right-turn queue may exceed the available right-turn storage; however, it is not anticipated to extend back to mainline I-5 but rather spill out of the right turn pocket and be accommodated in the adjacent southbound through lane. The southbound lane adjacent to the right-turn pocket is approximately 1,690 feet and the through/left-turn vehicle queue is estimated to be 1,025 feet with the Alternatives; therefore, there is

Comment Summary	Potential Approach in Preferred Alternative or Final EIS
	available storage to accommodate the anticipated spillover from the right-turn lane of approximately 155 to 180-feet.
Comment 1-5 There is not a clear list of the intended mitigation measures. A discussion is needed of additional mitigation measures, particularly at the I-5 interchange ramp terminals and SR 531 / Smokey Pt Blvd.	**Response 1-5** Mitigation measures are described starting on page 3-79 of the DEIS and the intersection and roadway improvements are documented on pages 3-79 to 3-80. Exhibit 76 summarizes the mitigation measures and pro-rata cost. The DEIS identifies on page 3-80 mitigation for the I-5/SR 531 interchange and Smokey Point Blvd/SR 531 intersection and indicates that the City is requiring more detailed review of potential mitigation measures as part of a current development application. The FEIS includes an updated Exhibit 76 with refined pro-rata cost recommendations and a list of the intersections and roadways requiring mitigation. The recommended mitigation measures documented in the DEIS include: ▪ Payment of pro-rata cost based on a per trip fee for improvements to: i. SR 531 between 43rd and 67th Avenues NE ii. SR 531 between 67th Avenue NE and SR 9 iii. 67th Avenue NE/188th Street NE intersection iv. I-5/SR 531 Interchange v. Smokey Point Blvd/SR 531 (172nd Street NE) ▪ Payment of the City of Arlington transportation impact fee ▪ Implementation of transportation demand management strategies ▪ Consideration of other measures such as ITS improvement or changes to LOS policies.
Comment 1-6 WSDOT Aviation has reviewed the Draft EIS and offers the following comments for consideration. Aviation Division fully supports the development of commercial / industrial facility in the airport industrial park in Arlington, Washington. This proposal is consistent with WSDOT's Airport and Compatible Land Use Guidebook for airports and does not impede the Arlington Municipal Airport's traffic pattern nor the FAA airspace structure. Special attention should be paid to ensure that this project does not create a height hazard obstruction, smoke, glare, electronic, wildlife attractants or other airspace hazards.	**Response 1-6** Comment noted. Thank you for the comment.

3.2 Corrections to Chapter 1 Summary

The following content was added to Section 1.6.3. Transportation in Chapter 1 Summary to match Draft EIS Chapter 3 text:

Section 1.6.3 Transportation

With mitigation, what is the ultimate outcome?

The Action Alternatives would allow for additional growth in the study area beyond what would occur with the No Action Alternative. With implementation of the proposed mitigation measures, there would be no significant and unavoidable impacts related solely to the proposed Action Alternatives.

Several intersections operate at LOS F during the weekday PM peak hour along SR 531 with or without the Action Alternatives. These intersections would also have poor operations with mitigation under both the No Action and Action Alternatives conditions. The SR 531 impacts are considered a cumulative significant and unavoidable adverse impact that would occur with or without the action alternatives.

There may be secondary impacts related to widening the SR 531 corridor as part of the proposed mitigation for the action alternatives. Providing the corridor improvements is anticipated to shift traffic volumes and delays may increase at some locations along SR 531. Reducing reliance on auto travel within the study area would help reduce secondary impacts.

The corrected Section 1.6.5 Utilities and Public Services is below. Additions included references to public services matching the results of Chapter 3 of the Draft EIS.

Section 1.6.5 Utilities and Public Services

How did we analyze Section 1.6.5 Utilities and Public Services?

Utilities and public services were analyzed by considering how the proposed alternatives, including changes in population, dwelling units, and jobs would affect water demand, wastewater generation, and the quantity of stormwater runoff as well as police, fire, parks, and schools. Stormwater quality is discussed in the Natural Environment section.

What impacts did we identify?

Water, Wastewater, and Stormwater: Increased demand for drinking water, increased wastewater generation, and changes in surfaces that generate the need for additional stormwater infrastructure.

Police: Each alternative would increase employee population but increases in industrial jobs are anticipated to have little impact on the City's adopted LOS standards for police services. While the population within the CIC is anticipated to increase under Alternative 1 this increase is small enough that significant impacts to crime rate, crime clearance rate, response time, or events per officer that would constitute the need to examine police staffing levels is not anticipated.

Fire: Additional employment in the area would increase daytime population and potentially increase call volumes as well. The City is in the process of constructing a new, two story fire station (Station 48), which will likely ensure response times are within the adopted LOS. The new facility is being constructed with commercial and industrial grade infrastructure for water supply as well.

Parks: Employees under all alternatives could use parks and recreation facilities in the city.

Schools: Alternative 2 and the No Action Alternative would not affect school generation.

What is different between the alternatives?

Utilities: Demand for water and generation of wastewater are scalable with population and jobs. As a result, all the alternatives increase water demand and wastewater generation. The Action Alternatives include larger increases in jobs than the No Action Alternative, so the Action Alternatives would result in larger increases in water demand and wastewater generation. Alternative 1 includes some additional population, which are not included in the No Action Alternative and Alternative 2. Alternative 2 includes more new jobs than the No Action Alternative or Alternative 1. Base on application of planning level estimates of water demand and wastewater generation per person and per employee, Alternative 2 is expected to result in the greatest increase in water demand and wastewater generation; however, water use can vary significantly by industry.

There is no substantial difference between the No Action Alterative, Alternative 1, or Alternative 2, from the standpoint of stormwater flow generation and ability of the stormwater system to convey the flow.

Public Services:

Police and Fire: All alternatives increase demand for police and fire services with No Action the least and Alternative 1 and the Preferred Alternative 1 the most.

Parks: Under Alternative 1 and the Preferred Alternative, there could be aa deficit 5.4 acres of community parks based on expected population growth.

Schools: The Preferred Alternative and Alternative 1 are expected to generate 238 students.

What are some solutions or mitigation for Section 1.6.5 Utilities and Public Services impacts?

- The Arlington Comprehensive Plan addresses levels of service and capital improvements for fire, police, and parks. This is updated periodically with the Comprehensive Plan.
- The Arlington Municipal Code includes common open space standards for new residential developments.
- The City could incentivize or require participation in regional stormwater when concepts are developed to help spur development and water quality and stormwater management.
- The City could employ crime prevention through environmental design standards through its industrial design guidelines.
- Park and recreation improvements are proposed with each action alternative such as in association with the relocation of Edgecomb Creek.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts are anticipated for the water, wastewater, and stormwater utilities under any of the alternatives. The City has developed comprehensive plans for all three utilities and these plans are updated regularly to reflect system needs. The capital project needs to support redevelopment of the Study Area are similar in scale to projects that the utilities execute on a regular basis. The costs of these improvements would be partially offset by general facility connection charges and rates for service.

No significant unavoidable adverse impacts are anticipated for fire, police, schools, and parks and recreation under any of the alternatives. With regular capital facility planning and implementation of mitigation measures no significant unavoidable adverse impacts are anticipated.

3.3 Corrections to Section 2.3.2

Corrected part of section 2.3.2 is below to reference the Draft Comprehensive Plan Amendments rather than the Subarea Plan:

The Planning Commission will hold a public hearing on the Draft Comprehensive Plan

Amendments and Planned Action. Their recommendations will be forwarded to the City Council for a public hearing and deliberation. The schedule will be included at the City of Arlington website: http://www.arlingtonwa.gov/310/Public-Notices.

3.4 Updates to Transportation

Based on coordination with WSDOT and consideration of the No Action and Action Alternative impacts, it was determined that pro-rata mitigation cost should be calculated relative to existing traffic volumes to mitigate the full future growth in the study area. Since no specific mitigation measures were identified for the No Action Alternative in other planning documents that could be built upon, the measurement relative to existing traffic conditions ensures mitigation of all the future traffic growth included in the No Action Alternative and the Action Alternatives rather than just a pro-rata cost for the incremental increase in traffic for the Action Alternatives.

Exhibit 76 of the DEIS has been updated with the adjusted pro-rata cost considering the existing traffic volumes and the Preferred Alternative, which has slightly lower trips than Action Alternative 2. In addition, to provide one complete list of capacity improvement mitigation measures that are identified for the Alternatives, the I-5/SR 531 Interchange and Smokey Point Blvd NE/SR 531 intersection have been added to the exhibit. When the City defines specific mitigation measures for the I-5/SR 531 Interchange and Smokey Point Blvd NE/SR 531 intersection, the total pro-rata cost for the CIC would be updated and the cost per trip would be adjusted.

Exhibit 76. Summary of Mitigation and Action Alternative Pro-Rata Cost

Location	Improvement	Estimated Total Cost (Million $)[1]	Existing Intersection Vehicle Volumes[2]	2040 Preferred Intersection Vehicle Volumes[2]	Total Volume Increase[3]	Percent Pro-Rata Share[4]	Pro-Rata Cost (Million $)[5]
SR 531 between 43rd Avenue NE and 67th Avenue NE	Widening SR 531 from 2 to 4-lanes with intersection improvements such as roundabouts at major intersections. Multiuse paths constructed along SR 531	$39.3	10,660	14,330	3,670	25.6%	$10.061
SR 531 between 67th Avenue NE and SR 9		$45.0	3,660	5,775	2,115	36.6%	$16.470

Location	Improvement	Estimated Total Cost (Million $)[1]	Existing Intersection Vehicle Volumes[2]	2040 Preferred Intersection Vehicle Volumes[2]	Total Volume Increase[3]	Percent Pro-Rata Share[4]	Pro-Rata Cost (Million $)[5]
67th Avenue NE/188th Street NE	Installation of traffic signal and railroad crossing improvements	$3.1	1,120	1,760	640	36.4%	$1.128
I-5/SR 531 Interchange	Specific intersection improvements are being reviewed with the City of Arlington as part of a development application	TBD	8,505	10,425	1,920	18.4%	TBD
Smokey Point Blvd/SR 531		TBD	4,480	5,260	780	14.8%	TBD
Total		**$87.4**					**$27.659**

Source: Transpo Group, 2020.
TBD = To be determined when the specific improvement is identified.
1. SR 531 43rd Avenue NE to 67th Avenue NE project cost based on WSDOT published as of September 25, 2020 https://wsdot.wa.gov/projects/sr531/43rd-ave-67th-ave/home. SR 531 67th Avenue NE to SR 9 project cost based on City of Arlington Six-Year Transportation Improvement Program 2019-2024. Intersection improvement cost 67th Avenue NE/188th Street NE based on estimates prepared by Transpo Group.
2. Volumes for SR 531 are total entering volumes for the major intersections.
3. 2040 Preferred Alternative intersection vehicle volumes – existing intersection vehicle volumes.
4. Project trips / 2040 Preferred Alternative intersection vehicle volumes.
5. Percent Pro-Rata Share x Estimated Total Cost.

As described in the DEIS, the pro-rata cost could be charged using a per trip fee. The cost would be adjusted when improvements were determined for the I-5/SR 531 Interchange and Smokey Point Blvd NE/SR 531 intersection. Considering the total pro-rata cost of the CIC Preferred Alternative of $27.659 million and the 4,735 trip increase (compared to existing trips), the fee per trip would be $5,841.39 based on the current information.

The mitigation measures identified, and pro-rata cost would be applicable to the Preferred Alternative identified by the City.

4.0 Acronyms and References

4.1 Acronyms

ADA	Americans with Disabilities Act
AMC	Arlington Municipal Code
CAO	Critical Areas Ordinance
CIP	Capital Improvement Program
CTR	Commute Trip Reduction
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
GHG	Greenhouse Gas
GMA	Growth Management Act
gpm	Gallons per Minute
HCM	Highway Capacity Manual
LF	Linear Feet
LOS	Level of Service
MDD	Maximum Daily Demand
MEV	Million Entering Vehicles
mgd	million gallons per day
MPH	Miles per Hour
MVMT	Million Vehicle Miles Traveled
NFIP	National Flood Insurance Program
NWI	National Wetlands Inventory
PSCAA	Puget Sound Clean Air Agency
PSRC	Puget Sound Regional Council
RCW	Revised Code of Washington
SMP	Shoreline Master Program
SOV	Single Occupancy Vehicle
SR	State Route
TMDL	Total Maximum Daily Load
VMT	Vehicle Miles Traveled
WRIA	Water Resource Inventory Area
WSDOT	Washington State Department of Transportation

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5.0 Appendices

A Inadvertent Discovery Plan

Protocols for Discovery of Archaeological Resources

In the event that archaeological resources are encountered during project implementation, the following actions will be taken:

In the find location, all ground disturbing activity will stop. The find location will be secured from any additional impacts and the supervisor will be informed.

The project proponent will immediately contact the agencies with jurisdiction over the lands where the discovery is located, if appropriate. The appropriate agency archaeologist or the proponent's contracting archaeologist will determine the size of the work stoppage zone or discovery location in order to sufficiently protect the resource until further decisions can be made regarding the work site.

The project proponent will consult with DAHP regarding the evaluation of the discovery and the appropriate protection measures, if applicable. Once the consultation has been completed, and if the site is determined to be NRHP-eligible, the project proponent will request written concurrence from the agency or tribe(s) that the protection and mitigation measures have been fulfilled. Upon notification of concurrence from the appropriate parties, the project proponent will proceed with the project.

Within six months after completion of the above steps, the project proponent will prepare a final written report of the discovery. The report will include a description of the contents of the discovery, a summary of consultation, and a description of the treatment or mitigation measures.

Protocols for Discovery of Human Remains

If human remains are found within the project location, the project proponent, its contractors or permit-holders, the following actions will be taken, consistent with Washington State RCWs 68.50.645, 27.44.055, and 68.60.055:

If ground-disturbing activities encounter human skeletal remains during the course of construction then all activity will cease that may cause further disturbance to those remains. The area of the find will be secured and protected from further disturbance. The project proponent will prepare a plan for securing and protecting exposed human remains and retain consultants to perform these services. The finding of human skeletal remains will be reported to the county medical examiner/coroner and local law enforcement in the most expeditious manner possible. The remains will not be touched, moved, or further disturbed. The county medical examiner/coroner will assume jurisdiction over the human skeletal remains and make a determination of whether those remains are forensic or non-forensic. If the county medical

examiner/coroner determines the remains are non-forensic, then they will report that finding to DAHP, which will then take jurisdiction over the remains. DAHP will notify any appropriate cemeteries and all affected tribes of the find. The State Physical Anthropologist will make a determination of whether the remains are Indian or Non-Indian and report that finding to any appropriate cemeteries and the affected tribes. DAHP will then handle all consultation with the affected parties as to the future preservation, excavation, and disposition of the remains.

Contact Information

Snohomish Tribe
11014 19th Avenue SE, Suite 8, Everett, WA 98208-5121
Primary Contact: The Honorable Michael Evans, Chairman, Phone: 425-671-1387

Stillaguamish Tribe of Indians
3310 Smokey Point Drive
PO Box 277, Arlington, WA 98223-0277
Primary Contact: Kerry Lyste, THPO, Cultural Resources, Phone: 360-652-7362 ext. 226

Tulalip Tribes
6410 23rd Avenue NE, Tulalip, WA 98271
Primary Contact: Richard Young, Cultural Resources, Phone: 360-716-2652 Cell: 425-239-0182

Washington Department of Archaeology and Historic Preservation
PO Box 48343, Olympia, WA 98504-8343
Lead Representative: Allyson Brooks, State Historic Preservation Officer, office: 360-586-3066
Primary Contact: Stephanie Jolivette, Local Government Archaeologist, Office: (360) 586-3088, Cell: (360) 628-2755
Primary Contact for Human Remains: Guy Tasa, State Physical Anthropologist, office: 360-586-3534, cell: 360-790-1633

Snohomish County Medical Examiner's Office
9509 29th Ave. West, Everett, WA 98204
Primary Contact: J. Matthew Lacy, Chief Medical Examiner, 425-438-6200

Snohomish County Sheriff's Office
3000 Rockefeller Avenue MS 606, Everett, WA 98201

Primary Contact: Adam Fortney, Sheriff, (425) 388-3393

B Planned Action Ordinance

ORDINANCE NO._____

AN ORDINANCE of the City Council of the City of Arlington, Washington, establishing a planned action for the Cascade Industrial Center pursuant to the State Environmental Policy Act

WHEREAS, the State Environmental Policy Act (SEPA) and implementing rules provide for the integration of environmental review with land use planning and project review through designation of "Planned Actions" by jurisdictions planning under the Growth Management Act (GMA); and

WHEREAS, the City has adopted a Comprehensive Plan complying with the GMA; and

WHEREAS, to guide the Cascade Industrial Center's growth and redevelopment, the City has engaged in extensive subarea planning and adopted AMMIC Subarea Plan, retitled as the Cascade Industrial Center subsequent to adoption; and

WHEREAS, the City desires to designate a Planned Action for the Cascade Industrial Center; and

WHEREAS, designation of a Planned Action expedites the permitting process for subsequent, implementing projects whose impacts have been previously addressed in a Planned Action environmental impact statement (EIS), and thereby encourages desired growth and economic development; and

WHEREAS, the Cascade Industrial Center Planned Action EIS identifies impacts and mitigation measures associated with planned development in the Cascade Industrial Center; and

WHEREAS, the City has adopted development regulations and ordinances which will help protect the environment; and

WHEREAS, the City's SEPA Rules, set forth in AMC 20.98.020 provide for Planned Actions within the City; and

WHEREAS, the City as lead agency provided public comment opportunities through an EIS scoping period from October 1 to October 30, 2020; and

THE CITY COUNCIL OF THE CITY OF ARLINGTON, WASHINGTON, DOES HEREBY ORDAIN AS FOLLOWS:

SECTION 1. *Recitals.* The recitals set forth in this ordinance are hereby incorporated as if fully set forth herein.

SECTION 2. *Purpose.* The City Council declares that the purpose of this ordinance is to:

A. Combine environmental analysis, land use plans, development regulations, City codes and ordinances together with the mitigation measures in the Cascade Industrial Center Planned Action EIS to mitigate environmental impacts and process planned action development applications in the Planned Action Area;

B. Designate the Cascade Industrial Center as a Planned Action Area for purposes of environmental review and permitting of subsequent, implementing projects pursuant to SEPA, RCW 43.21C.440;

C. Determine that the EIS prepared for the Cascade Industrial Center meets the requirements of a Planned Action EIS pursuant to SEPA;

D. Establish criteria and procedures, consistent with state law, that will determine whether subsequent projects within the Planned Action Area qualify as Planned Actions;

E. Provide the public with information about Planned Actions and how the City will process implementing projects within the Planned Action Area;

F. Streamline and expedite the land use permit review process by relying on the EIS completed for the Planned Action; and

G. Apply the City's development regulations together with the mitigation measures described in the EIS and this Ordinance to address the impacts of future development contemplated by this Ordinance.

SECTION 3. *Findings.* The City Council finds as follows:

A. The City is subject to the requirements of the GMA (RCW 36.70A), and is applying the Planned Action to a UGA [Urban Growth Area]; and

B. The City has adopted a Comprehensive Plan complying with the GMA; and

C. The City is adopting capital facility plan amendments to implement said Plan; and

D. An EIS has been prepared for the Planned Action Area, and the City Council finds that the EIS adequately identifies and addresses the probable significant environmental impacts associated with the type and amount of development planned to occur in the designated Planned Action Area; and

E. The mitigation measures identified in the Cascade Industrial Center Planned Action EIS and attached to this ordinance as Exhibit B, incorporated herein by reference, together with adopted City development regulations, will adequately mitigate significant impacts from development within the Planned Action Area; and

F. The AMMIC Subarea Plan (retitled the Cascade Industrial Center) and Cascade Industrial Center Planned Action EIS identify the location, type and amount of development that is contemplated by the Planned Action; and

G. Future projects that are implemented consistent with the Planned Action will protect the environment, benefit the public and enhance economic development; and

H. The City provided several opportunities for meaningful public involvement in the Cascade Industrial Center Subarea Plan and Planned Action EIS;

I. Essential public facilities defined in RCW 47.06.140 are excluded from the Planned Action and not eligible for review or permitting as Planned Actions unless they are accessory to or part of a project that otherwise qualifies as a planned action; and

J. The Planned Action applies to a defined area that is smaller than the overall City boundaries and smaller than overall County designated UGAs; and

K. Public services and facilities are adequate to serve the proposed Planned Action, with implementation of Subarea Plan and mitigation measures identified in the EIS.

SECTION 4. Procedures and Criteria for Evaluating and Determining Planned Action Projects within Planned Action Area.

A. Planned Action Area. This Planned Action designation shall apply to the area shown in **Exhibit A**, incorporated herein by reference.

B. Environmental Document. A Planned Action determination for a site-specific project application within the Planned Action Area shall be based on the environmental analysis contained in the Draft EIS issued by the City on October 1, 2020 and the Final EIS published on January 2021. The Draft and Final EIS documents shall comprise the Cascade Industrial Center Planned Action EIS for the Planned Action Area. The mitigation measures contained in **Exhibit B,** attached to this Ordinance and incorporated herein by reference, are based upon the findings of the Planned Action EIS and shall, along with adopted City regulations, provide the framework that the City will use to apply appropriate conditions on qualifying Planned Action projects within the Planned Action Area.

C. Planned Action Designated. Land uses and activities described in the Planned Action EIS, subject to the thresholds described in Subsection 4(D) and the mitigation measures contained in **Exhibit B**, are designated Planned Actions or Planned Action Projects pursuant to RCW 43.21C.440. A development application for a site-specific Planned Action project located within Planned Action Area shall be designated a Planned Action if it completes the modified SEPA Checklist in **Exhibit B** and meets the criteria set forth in Subsection 4(D) of this Ordinance and all other applicable laws, codes, development regulations and standards of the City are met.

D. Planned Action Qualifications. The following thresholds shall be used to determine if a site-specific development proposed within the Planned Action Area was contemplated as a Planned Action and has had its environmental impacts evaluated in the Planned Action EIS:

(1) Qualifying Land Uses.

(a) Planned Action Categories: The following general categories/types of land uses are defined in the AMMIC Subarea Plan (now retitled the Cascade Industrial Center) and are considered Planned Actions:

i. Industrial/Manufacturing: The general industrial (GI) and light industrial (LI) uses primarily to accommodate enterprises engaged in the manufacturing, processing, creating, repairing, renovating, painting, cleaning, or assembling of goods, merchandise, or equipment. Aerospace, robotics, advanced manufacturing, food processing, maritime, wood products and mass timber manufacturing are desired sectors identified in the subarea plan. Workforce development uses and limited amounts of workforce housing tied to these sectors are also allowed. The performance standards set forth in Part I of Chapter 20.44 place limitations on the characteristics of uses located in these districts. The light industrial district is distinguished from the general industrial district in that the light industrial district is intended to be a cleaner, more business park-like area, whereas the general industrial district allows more resource-based manufacturing, and has a greater tolerance of the nuisances that typically accompany such manufacturing. Furthermore, the limitations in the light industrial district are more restrictive than those in the general industrial district.

ii. Aviation-related uses: Aviation Flightline uses proximate to airport runways and taxiways. Aviation related uses include any uses related to supporting aviation that require direct taxiway access as a necessary part of their business operations, such as aviation services, manufacturing of aviation-related goods, general services whose primary customers would be those engaged in aviation-related activities (e.g., restaurants primarily catering to pilots, employees, or passengers), or other uses that are clearly related to aviation.

iii. Commercial: Industrial serving commercial uses including retail, office, and services consistent with zone requirements.

iv. Open Space, Recreation: Active and passive parks, recreation, and open space facilities consistent with zone requirements, including fish and wildlife habitat enhancements considered in the AMMIC Subarea Plan or associated EIS.

(b) Planned Action Uses: A land use shall be considered a Planned Action Land Use when:

i. it is within the Planned Action Area as shown in Exhibit A;

ii. it is within one or more of the land use categories described in subsection 1(a) above; and

iii. it is listed in development regulations applicable to the zoning classifications applied to properties within the Planned Action Area.

A Planned Action may be a single Planned Action use or a combination of Planned Action uses together in a mixed use development. Planned Action uses include accessory uses.

(c) Public Services: The following public services, infrastructure and utilities are also Planned Actions: Multi-modal transportation improvements, water and sewer improvements, and stormwater improvements, considered in capital plans associated with the AMMIC Subarea Plan (now retitled Cascade Industrial Center).

i. Applicants for public services, infrastructure and utilities projects shall demonstrate consistency with the AMMIC Subarea Plan (now retitled Cascade Industrial Center), Arlington Shoreline Master Program, and Arlington Critical Areas Ordinance.

ii. Essential public facilities defined in RCW 47.06.140 are excluded from the Planned Action and not eligible for review or permitting as Planned Actions unless they are accessory to or part of a project that otherwise qualifies as a planned action.

(2) Development Thresholds:

(a) Land Use: The following amounts of various new land uses are contemplated by the Planned Action:

Table D2a-1. Alternative Comparison of Total and Net Growth

*	Existing	Preferred	Net Change*
Population	890	2,273	1,383
Dwellings	332	848	516
Jobs	4,969	13,813	8,844

**Net change compared to existing. Source; PSRC 2020; Transpo Group 2020; BERK, 2020.*

(b) Shifting development amounts between land uses in Subsection 4(D)(2)(a) may be permitted when the total build-out is less than the aggregate amount of development reviewed in the EIS; the traffic trips for the preferred alternative are not exceeded; and, the development impacts identified in the Planned Action EIS and are mitigated consistent with Exhibit B.

(c) Further environmental review may be required pursuant to WAC 197-11-172, if any individual Planned Action or combination of Planned Actions exceed the development thresholds specified in this Ordinance and/or alter the assumptions and analysis in the Planned Action EIS.

(3) Transportation Thresholds:

(a) Trip Ranges & Thresholds. The maximum number of PM peak hour trips anticipated in the Planned Action Area and reviewed in the EIS is as follows:

Table D3a-1. PM Peak Hour Vehicle Trips Generated, Preferred Alternative

Weekday PM Peak Hour Trip Generation

	PM Peak Hour Vehicle Trips (In)	PM Peak Hour Vehicle Trips (Out)	PM Peak Hour Vehicle Trips Total
Existing	890	2,280	3,170
Preferred Alternative	2,225	5,680	7,905
Net New Trips	1,335	3,400	4,735

Source: Transpo Group, 2020.

(b) Concurrency. All Planned Actions shall meet the transportation concurrency requirements and the level of service (LOS) thresholds established in the Arlington Comprehensive Plan and AMC Chapter 20.56.

(c) Traffic Impact and Mitigation. The responsible City official shall require documentation by Planned Action Project applicants demonstrating that the total trips identified in Subsection 4.D(3)(a) are not exceeded, that the project meets the concurrency standards of Subsection 3.D(3)(b), and that the project has mitigated impacts consistent with **Exhibit B**. Planned action applicants shall provide the following documentation at a minimum unless otherwise required to address standards of AMC 20.04.120 and AMC 20.56,:

(i) Trip generation and total trips in relation to the trip bank in Subsection 3.D(3)(a) and (d).

(ii) Site-specific access design and consistency with City standards.

(iii) Implementation of required frontage improvements per Exhibit B-3 and applicable City engineering standards.

(iv) Share of cost on areawide mitigation per Exhibit B-3.

(d) Discretion. The City Engineer or his/her designee shall have discretion to determine incremental and total trip generation, consistent with the Institute of Traffic Engineers (ITE) Trip Generation Manual (latest edition) or an alternative manual accepted by the City Engineer at his or her sole discretion, for each project permit application proposed under this Planned Action.

(4) Elements of the Environment and Degree of Impacts. A proposed project that would result in a significant change in the type or degree of adverse impacts to any element(s) of the environment analyzed in the Planned Action EIS, would not qualify as a Planned Action.

(5) Changed Conditions. Should environmental conditions change significantly from those analyzed in the Planned Action EIS, the City's SEPA Responsible Official may determine that the Planned Action designation is no longer applicable until supplemental environmental review is conducted.

(6) Substantive Authority. Pursuant to SEPA Substantive Authority at AMC 20.98.200 and Comprehensive Plan Policies, impacts shall be mitigated through the measures included in **Exhibit B**.

E. Planned Action Review Criteria.

(1) The City's SEPA Responsible Official may designate as "planned actions", pursuant to RCW 43.21C.030, applications that meet all of the following conditions:

(a) The proposal is located within the Planned Action area identified in **Exhibit A** of this ordinance;

(b) The proposed uses and activities are consistent with those described in the Planned Action EIS and Subsection 4(D) of this ordinance;

(c) The proposal is within the Planned Action thresholds and other criteria of Subsection 4(D) of this ordinance;

(d) The proposal is consistent with the City of Arlington Comprehensive Plan and the AMMIC Subarea Plan (now retitled Cascade Industrial Center);

(e) The proposal's significant adverse environmental impacts have been identified in the Planned Action EIS;

(f) The proposal's significant impacts have been mitigated by application of the measures identified in **Exhibit B**, and other applicable City regulations, together with any modifications or variances or special permits that may be required;

(g) The proposal complies with all applicable local, state and/or federal laws and regulations, and the SEPA Responsible Official determines that these constitute adequate mitigation; and

(h) The proposal is not an essential public facility as defined by RCW 36.70A.200(1), unless the essential public facility is accessory to or part of a development that is designated as a planned action under this ordinance.

(2) The City shall base its decision on review of a Planned Action SEPA checklist (Exhibit B), or an alternative form approved by state law, and review of the application and supporting documentation.

(3) A proposal that meets the criteria of this section shall be considered to qualify and be designated as a planned action, consistent with the requirements of RCW 43.21C.030, WAC 197-11-164 et seq., and this ordinance.

F. Effect of Planned Action.

(1) Designation as a Planned Action Project by the SEPA Responsible Official means that a qualifying proposal has been reviewed in accordance with this Ordinance and found to be consistent with the development parameters and thresholds established herein, and with the environmental analysis contained in the Planned Action EIS.

(2) Upon determination by the City's SEPA Responsible Official that the proposal meets the criteria of Subsection 4(D) and qualifies as a planned action, the proposal shall not require a SEPA threshold determination, preparation of an EIS, or be subject to further review pursuant to SEPA.

G. Planned Action Permit Process. Applications for planned actions shall be reviewed pursuant to the following process:

(1) Development applications shall meet all applicable requirements of the Arlington Municipal Code (AMC). Applications for planned actions shall be made on forms provided by the City and shall include the Planned Action SEPA checklist (Exhibit B).

(2) The City's SEPA Responsible Official shall determine whether the application is complete as provided in AMC Chapter 20.98.

(3) If the application is for a project within the Planned Action Area defined in Exhibit A, the application will be reviewed to determine if it is consistent with the criteria of this ordinance and thereby qualifies as a Planned Action project.

(a) The decision of the City's SEPA Responsible Official regarding qualification of a project as a Planned Action is an administrative decision. The SEPA Responsible Official shall notify the applicant of his/her decision. Notice of the determination on zoning permit decisions per AMC 20.16.100 involving a planned action shall also be mailed or otherwise verifiably delivered to federally recognized tribal governments and to agencies with jurisdiction over the planned action project, pursuant to RCW 43.21C.440.

(b) If the project is determined to qualify as a Planned Action, it shall proceed in accordance with the applicable permit review procedures specified in AMC Chapter 20.16, except that no SEPA threshold determination, EIS or additional SEPA review shall be required.

(c) Notice of the application for a planned action project shall be consistent with Chapter 20.98 AMC.

(4) If notice is otherwise required for the underlying permit, the notice shall state that the project has qualified as a Planned Action. If notice is not otherwise required for the underlying permit, no special notice is required by this ordinance. See Subsection 4(G)(3)(a) regarding notice of the zoning permit decision.

(5) To provide additional certainty about applicable requirements, the City or applicant may request consideration and execution of a development agreement for a Planned Action project, consistent with RCW 36.70B.170 et seq.

(6) If a project is determined to not qualify as a Planned Action, the SEPA Responsible Official shall so notify the applicant and prescribe a SEPA review procedure consistent with the City's SEPA regulations and the requirements of state law. The notice shall describe the elements of the application that result in failure to qualify as a Planned Action.

(7) Projects that fail to qualify as Planned Actions may incorporate or otherwise use relevant elements of the Planned Action EIS, as well as other relevant SEPA documents, to meet their SEPA requirements. The SEPA Responsible Official may limit the scope of SEPA review for the non-qualifying project to those issues and environmental impacts not previously addressed in the Planned Action EIS.

SECTION 5. *Monitoring and Review.*

A. The City should monitor the progress of development in the designated Planned Action area as deemed appropriate to ensure that it is consistent with the assumptions of this ordinance and the Planned Action EIS regarding the type and amount of development and associated impacts, and with the mitigation measures and improvements planned for the Planned Action Area.

B. This Planned Action Ordinance shall be reviewed by the SEPA Responsible Official no later than five years from its effective date. The review shall determine the continuing relevance of the Planned Action assumptions and findings with respect to environmental conditions in the Planned Action area, the impacts of development, and required mitigation measures. The SEPA Responsible Official shall also consider the implementation of Public Agency Actions and Commitments in Exhibit C. Based upon this review, the City may propose amendments to this ordinance and/or may supplement or revise the Planned Action EIS.

SECTION 6. *Conflict***.** In the event of a conflict between this Ordinance or any mitigation measures imposed thereto, and any Ordinance or regulation of the City, the provisions

of this Ordinance shall control, except that the provision of any International Building Code shall supersede.

SECTION 7. *Severability*. If any one or more sections, subsections, or sentences of this Ordinance are held to be unconstitutional or invalid such decision shall not affect the validity of the remaining portions of this Ordinance and the same shall remain in full force and effect.

SECTION 8. *Effective Date*. This ordinance shall take effect and be in force ten (10) days from and after its passage, approval and publication as provided by law.

PASSED by the City Council the_____ day of _____, 2020

_____
Jessica Stickles, Mayor pro tem

Approved this _____ day of _____, 2020

_____
Barb Tolbert, Mayor

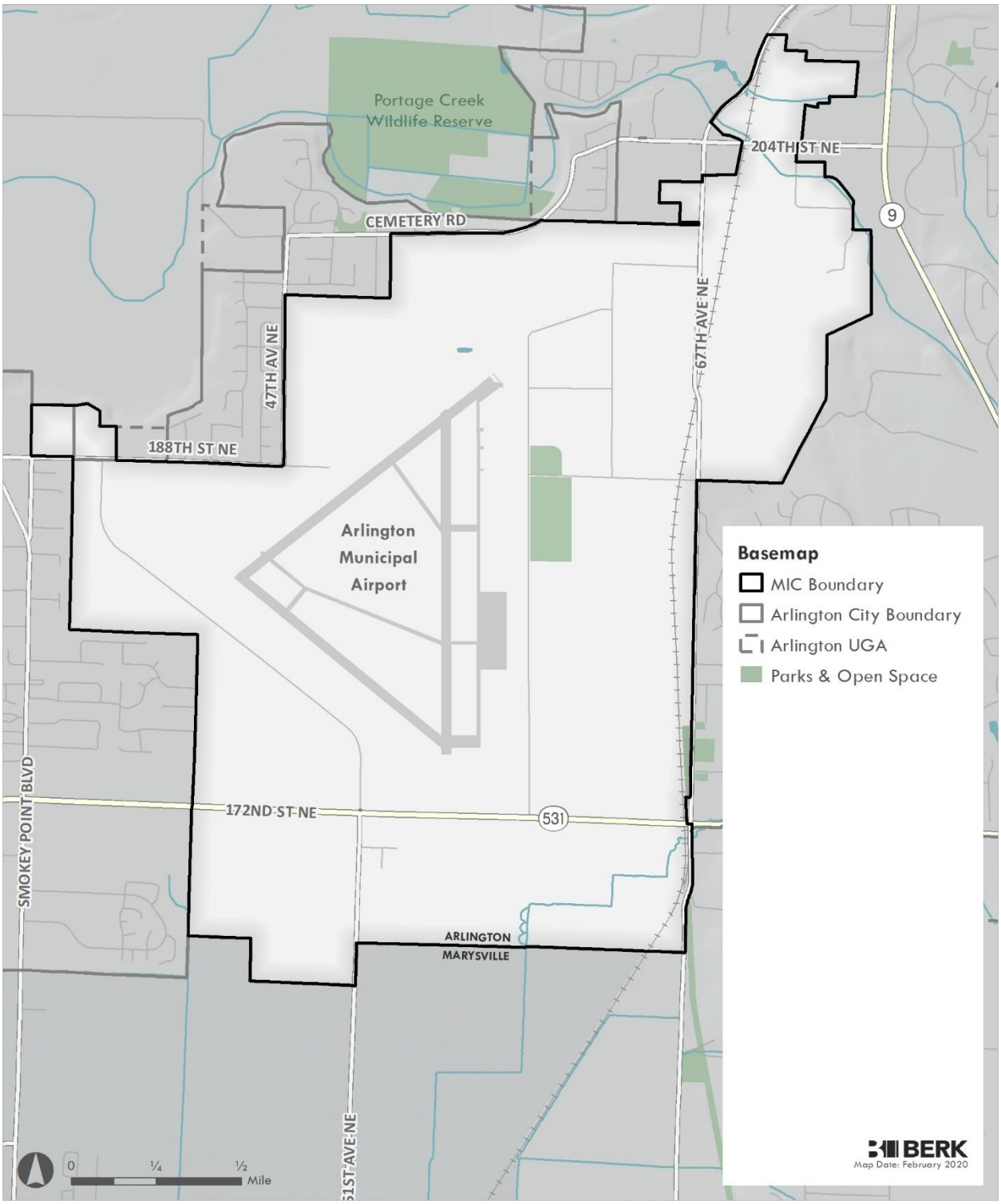
ATTEST: APPROVED AS TO FORM:

_____ _____
Wendy Van Der Meersche, City Clerk Steve Peiffle, City Attorney

PUBLISHED the_____ day of _____, 2020
EFFECTIVE the _____day of _____, 2020

ORDINANCE NO. _____

Exhibit A: Cascade Industrial Center Planned Action Area



Source: City of Arlington, 2020; BERK, 2020.

Exhibit B. SEPA Checklist and Mitigation Measures

Exhibit B: Example Environmental Checklist and Required Mitigation Document

INTRODUCTION

The State Environmental Policy Act (SEPA) requires environmental review for project and non-project proposals that are likely to have adverse impacts upon the environment. In order to meet SEPA requirements, the City of Arlington issued the Cascade Industrial Center Planned Action Draft Environmental Impact Statement (EIS) on October 1, 2020, and the Final EIS was issued on January 11, 2021. The Draft and the Final EIS together are referenced herein as the "EIS". The EIS has identified significant beneficial and adverse impacts that are anticipated to occur with the future development of the Planned Action Area, together with a number of possible measures to mitigate those significant adverse impacts.

On January 19, 2021, the City of Arlington adopted Ordinance No. _____ establishing a planned action designation for the Cascade Industrial Center studied as Planned Action in the EIS (see **Exhibit A**). SEPA Rules indicates review of a project proposed as a planned action is intended to be simpler and more focused than for other projects (WAC 197-11-172). In addition, SEPA allows an agency to utilize a modified checklist form that is designated within the planned action ordinance (see RCW 43.21c.440). This **Exhibit B-1** provides a modified checklist form adopted in the Cascade Industrial Center Planned Action Ordinance.

MITIGATION DOCUMENT

A Mitigation Document is provided in **Exhibit B-2**, and also summarized in the environmental checklist. **Exhibit B-2** establishes specific mitigation measures, based upon significant adverse impacts identified in the EIS. The mitigation measures shall apply to future development proposals which are consistent with the Planned Action scenarios reviewed in the EIS, and which are located within the Cascade Industrial Center Planned Action Area (see **Exhibit A**). In addition, **Exhibit B-3** provides details of transportation mitigation requirements.

APPLICABLE PLANS AND REGULATIONS

The EIS identifies specific regulations that act as mitigation measures. These are summarized in **Exhibit B-4** by EIS topic, and are advisory to applicants. All applicable federal, state, and local regulations shall apply to Planned Actions, including the regulations that are adopted with the Preferred Alternative. Planned Action applicants shall comply with all adopted regulations where applicable including those listed in the EIS and those not included in the EIS.

INSTRUCTIONS TO APPLICANTS

This environmental checklist asks you to describe some basic information about your proposal. The City of Arlington will use this checklist to determine whether the project is consistent with the analysis in the Cascade Industrial Center Planned Action EIS and qualifies as a planned action or would otherwise require additional environmental review under SEPA. Answer the questions briefly, with the most precise information known, or give the best description you can. You must answer each question accurately and carefully, to the best of your knowledge. The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The City may ask you to explain your answers or provide additional information. In most cases, you should be able to answer the questions from your own project plans and the Planned Action EIS without the need to hire experts.

EXHIBIT B-1 MODIFIED SEPA CHECKLIST

A. Proposal Description

Date:			
Applicant:			
Property Owner:			
Property Address	Street:	City, State, Zip Code:	
Parcel Information	Assessor Parcel Number:	Property Size in Acres:	
Give a brief, complete description of your proposal.			
Property Zoning	District Name:	Building Type:	
Permits Requested (list all that apply)	Land Use: Building:	Engineering: Other:	
	All Applications Deemed Complete? Yes __ No __ Explain:		
	Are there pending governmental approvals of other proposals directly affecting the property covered by your proposal? Yes __ No __ Explain:		
Existing Land Use	Describe Existing Uses on the Site:		
Proposed Land Use – Check and Circle All That Apply	Industrial/Manufacturing Aviation Flightline	Commercial Open Space, Recreation Other	
Non-residential Uses: Building Square Feet	Existing:	Proposed:	
	Employment in Ordinance: 13,813	Job Remainder as of _____20__ _____ square feet	
Dwellings	# Existing Dwellings: #____ Dwelling Type _____ #____ Dwelling Type _____	# Proposed Dwellings Units: #____ Type _____ #____ Type _____	Proposed Density (du/ac):
	Dwelling Threshold Total in Ordinance: 848	Dwelling Bank Remainder as of _____20__ _____dwellings	

Building Height	Existing Stories: Existing Height in feet		Proposed Stories: Proposed Height in feet:
Parking Spaces	Existing:		Proposed:
Impervious Surfaces	Existing Square Feet:		Proposed Square Feet:
PM Peak Hour Weekday Vehicle Trips	Existing Estimated Trips Total:	Future Estimated Trips Total:	Net New Trips:
	Source of Trip Rate: ITE Manual ___ Other ____		Transportation Impacts Determined Consistent with AMC 20.04.120 and Chapter 20.56. Yes ____ No ____
Proposed timing or schedule (including phasing).			
Describe plans for future additions, expansion, or further activity related to this proposal.			
List any available or pending environmental information directly related to this proposal.			

B. Environmental Checklist and Mitigation Measures

NATURAL ENVIRONMENT CHECKLIST AND MITIGATION MEASURES

Geology/Soils Checklist and Mitigation Measures

1. Description of Conditions A. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____ B. What is the steepest slope on the site (approximate percent slope)? _____ C. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? _____	**Staff Comments:**
2. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.	
3. Has any part of the site been classified as a "geologically hazardous" area? (Check all that apply) □ Landslide Hazards □ Erosion Hazards □ Seismic Hazards □ Liquefaction Hazards □ Other: _____ Describe:	
4. Proposed Measures to control impacts including **Exhibit B-2 and B-4** regarding Mitigation Document and Applicable Regulations and Advisory Notes, respectively: □ Temporary erosion and sediment controls □ Compliance with grading and fill standards □ Compliance with Critical Area Regulations Explain:	

Water Resources/Stormwater Checklist and Mitigation Measures

5. Will the proposal require or result in (check all that apply and describe below): □ any work over, in, or adjacent to (within 200 feet) of Edgecomb Creek or Portage Creek? □ fill and dredge material that would be placed in or removed from surface water or wetlands? □ surface water withdrawals or diversions? □ discharges of waste materials to surface waters? □ groundwater withdrawal or discharge? □ waste materials entering ground or surface waters?	**Staff Comments:**
6. Describe the source of runoff (including stormwater) and method of collection, treatment, and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.	
7. Is the area designated a critical aquifer recharge area? If so, please describe:	
8. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?	

Water Resources/Stormwater Checklist and Mitigation Measures

9. **What measures are proposed to reduce or control water resources/stormwater impacts?** Proposed Measures to control impacts including **Exhibit B-2 and B-4** regarding Mitigation Document and Applicable Regulations and Advisory Notes, respectively (check all that apply): □ Compliance with construction-related stormwater requirements, including temporary erosion and sediment control, and development and implementation of a stormwater pollution and spill prevention plan. □ Determination of necessary permanent, long-term water quality treatment requirements. □ Low Impact Development (LID) techniques employed, consistent with AMC 13.28? □ Adequate erosion protection at outfalls. □ Other: Explain:	

Plants and Animals Checklist and Mitigation Measures

10. Check or circle types of vegetation found on the site: □ Deciduous tree: Alder, maple, aspen, other _____ □ Evergreen tree: Fir, cedar, pine, other □ Shrubs □ Grass □ Pasture □ Crop or grain □ Wet soil plants: Cattail, buttercup, bullrush, skunk cabbage, other □ Water plants: Water lily, eelgrass, milfoil, other _____ Other types of vegetation: _____	**Staff Comments:**
11. Are there wetlands on the property? Please describe their acreage and classification.	
12. Is there riparian habitat on the property?	
13. What kind and amount of vegetation will be removed or altered?	
14. List threatened or endangered species known to be on or near the site	
15. Are there plants or habitats subject to Critical Areas and/or Shoreline Master Program?	
16. Is the proposal consistent with critical area regulations, shoreline regulations, and requirements of the AMMIC Subarea Plan (now retitled Cascade Industrial Center)? Please describe.	
17. Proposed landscaping, use of native plants, buffers, or other measures to preserve or enhance vegetation on the site, if any:	

Plants and Animals Checklist and Mitigation Measures

18. Proposed Measures to control impacts including **Exhibit B-2 and B-4** regarding Mitigation Document and Applicable Regulations and Notes, respectively (check all that apply): □ Compliance with Critical Areas Ordinance □ Compliance with Shoreline Master Program □ Implementation of on-site or street frontage green infrastructure □ Implementation of Chapter 20.76 - Screening and Trees □ Other: Explain:	

CULTURAL RESOURCES CHECKLIST AND MITIGATION MEASURES

Cultural Resources Checklist and Mitigation Measures

19. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national or state preservation registers? If so, specifically describe.	**Staff Comments:**
20. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.	
21. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national or state preservation registers? If so, specifically describe.	
22. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.	
Proposed Measures to control impacts including **Exhibit B-2 and B-4** regarding Mitigation Document and Applicable Regulations and Notes, respectively (check all that apply): □ Compliance with AMMIC (now renamed Cascade Industrial Center) Subarea Plan. □ Compliance with other applicable land use and shoreline policies and development regulations. □ Tribal, federal, or state consultations for cultural or eligible historic resources. □ Evaluation per Exhibit B-2 and implementation of associated recommended conditions. □ Inadvertent discovery plan. □ Other Explain:	

TRANSPORTATION CHECKLIST AND GREENHOUSE GAS MITIGATION MEASURES

Transportation Checklist and Mitigation Measures

23. Identify public streets and highways serving the site and describe proposed access to the existing street system. Show on site plans, if any.	**Staff Comments:**
24. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?	
25. How many parking spaces would the completed project have? How many would the project eliminate?	
26. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).	
27. How many PM peak hour vehicular trips per day would be generated by the completed project?	
28. Is the land use addressed by the EIS Greenhouse Gas Analysis?	
29. Proposed Measures to control impacts including **Exhibit B-2, Exhibit B-3, and B-4 regarding** Mitigation Document, Additional Mitigation Requirements and Procedures, and Applicable Regulations and Notes, respectively **(check all that apply):** □ Evaluate and mitigate roadways consistent with Planned Action Ordinance Section 4.D(3). □ Commute Trip Reduction (AMC Chapter 10.80) □ Transportation Demand Management (TDM) Programs □ Street frontage standards □ Impact fee and SEPA mitigation fee for fair share of capital improvements □ Other: Explain:	

LAND USE AND AESTHETICS CHECKLIST AND MITIGATION MEASURES

Land Use and Aesthetics Checklist and Mitigation Measures

30. What is the current use of the site and adjacent properties?	**Staff Comments:**
31. Describe any structures on the site. Will any structures be demolished? If so, what type, dwelling units, square feet?	
32. What is the current zoning classification of the site?	
33. What is the current Comprehensive Plan designation and zoning classification of adjacent sites?	
34. If applicable, what is the current shoreline master program designation of the site?	

Land Use and Aesthetics Checklist and Mitigation Measures

35. What is the planned use of the site? List type of use, number of dwelling units and building square feet.	
36. Approximately how many people would reside or work in the completed project?	
37. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.	
38. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.	
39. Approximately how many people would the completed project displace?	
40. What is the tallest height of any proposed structure(s)?	
41. Would any views in the immediate vicinity be altered or obstructed?	
42. Would the proposal produce light or glare? What time of day would it mainly occur?	
43. Could light or glare from the finished project be a safety hazard or interfere with views?	
44. What existing offsite sources of light or glare may affect your proposal?	
45. Would shade or shadow affect public parks, recreation, open space, or gathering spaces?	
Proposed Measures to control impacts including **Exhibit B-2 and B-4 regarding** Mitigation Document and Applicable Regulations and Notes, respectively (check all that apply): □ Compliance with AMMIC Subarea Plan. □ Compliance with other applicable land use and shoreline policies and development regulations. □ Other Explain:	

UTILITIES AND PUBLIC SERVICES CHECKLIST AND MITIGATION MEASURES

Public Services and Utilities Checklist

46. Water Supply: Would the project result in an increased need for water supply or fire flow pressure? Can City levels of service be met?	**Staff Comments:**
47. Wastewater: Would the project result in an increased need for wastewater services? Can City levels of service be met?	

Public Services and Utilities Checklist	
48. Police Protection: Would the project increase demand for police services? Can City levels of service be met?	
49. Fire and Emergency Services: Would the project increase demand for fire and/or emergency services? Can levels of services be met?	
50. Schools: Would the project result in an increase in demand for school services? Can levels of services be met? Is an impact fee required?	
51. Parks and Recreation: Would the project require an increase in demand for parks and recreation? Can levels of services be met?	
52. Other Public Services and Utilities: Would the project require an increase in demand for other services and utilities? Can levels of services be met?	
53. Proposed Measures to control impacts including **Exhibit B-1 and B-4 regarding** Mitigation Required for Development Applications and **Exhibit B-3** Applicable Regulations **(check all that apply):** □ Capital Facility Plan has been considered, and development provides its fair share of the cost of improvements consistent with applicable local government plans and codes. □ Law enforcement agency has been consulted, and development reflects applicable code requirements. □ Fire protection agency has been consulted, and development complies with Uniform Fire Code. □ School impact fee, if applicable. □ Parks impact fee, if applicable. □ Developer has coordinated with City to ensure that sewer lines, water lines, or stormwater facilities will be extended to provide service to proposed development site where required. □ General facility charges have been determined to ensure cumulative impacts to utilities are addressed. □ Other Measures to reduce or control public services and utilities impacts: Explain:	

C. Applicant Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:	
Date:	

D. Review Criteria

REVIEW CRITERIA

The City's SEPA Responsible Official may designate "planned actions" consistent with criteria in Ordinance No. _____ Subsection 4.E.

Criteria	Discussion
(a) the proposal is located within the Planned Action area identified in Exhibit A of this Ordinance;	
(b) the proposed uses and densities are consistent with those described in the Planned Action EIS and Section 4.D of this Ordinance;	
(c) the proposal is within the Planned Action thresholds and other criteria of Section 4.D of this Ordinance;	
(d) the proposal is consistent with the City of Arlington Comprehensive Plan and the AMMIC Subarea Plan;	
(e) the proposal's significant adverse environmental impacts have been identified in the Planned Action EIS;	
(f) the proposal's significant impacts have been mitigated by application of the measures identified in Exhibit B, and other applicable City regulations, together with any modifications or variances or special permits that may be required;	
(g) the proposal complies with all applicable local, state and/or federal laws and regulations, and the SEPA Responsible Official determines that these constitute adequate mitigation;	
(h) the proposal is not an essential public facility as defined by RCW 36.70A.200(1), unless the essential public facility is accessory to or part of a development that is designated as a planned action under this ordinance.	

DETERMINATION CRITERIA

Applications for planned actions shall be reviewed pursuant to the process in Ordinance No. ____ Section 4.G.

Requirement	Discussion
Applications for planned actions were made on forms provided by the City including this Cascade Industrial Center Environmental Checklist and Mitigation Document.	
The application has been deemed complete in accordance with BMC Chapter 20.02.	
The proposal is located within Planned Action Area pursuant to Exhibit A of this Ordinance	
The proposed use(s) are listed in Section 4D of the Ordinance and qualify as a Planned Action.	

E. SEPA Responsible Official Determination

A. Qualifies as a Planned Action: The application is consistent with the criteria of Ordinance_____ and thereby qualifies as a Planned Action project.
It shall proceed in accordance with the applicable permit review procedures specified in _____, except that no SEPA threshold determination, EIS or additional SEPA review shall be required.
Notice shall be made pursuant to AMC Chapter 20.98. as part of notice of the underlying permits and shall include the results of the Planned Action determination. If notice is not otherwise required for the underlying permit, no special notice is required. See Section 4.G(3)(a) regarding notice of the zoning permit decision.
The review process for the underlying permit shall be as provided in AMC Chapter 20.16.
NOTE: If it is determined during subsequent detailed permit review that a project does not qualify as a planned action, this determination shall be amended.

Signature	
Date:	

B. Does not Qualify as Planned Action: The application is not consistent with the criteria of Ordinance _____, and does not qualify as a Planned Action project for the following reasons:

Projects that fail to qualify as Planned Actions may incorporate or otherwise use relevant elements of the Planned Action EIS, as well as other relevant SEPA documents, to meet their SEPA requirements. The SEPA Responsible Official may limit the scope of SEPA review for the non-qualifying project to those issues and environmental impacts not previously addressed in the Planned Action EIS.

SEPA Process Prescribed:

C. Responsible Official Signature

Signature:	
Date:	

EXHIBIT B-2 MITIGATION DOCUMENT

A Mitigation Document is provided in this Exhibit B-1 to establish specific mitigation measures based upon significant adverse impacts identified in the Planned Action EIS. The mitigation measures in this Exhibit B-1 shall apply to Planned Action Project applications that are consistent with the Alternative range reviewed in the Planned Action EIS and which are located within the Planned Action Area (see Exhibit A).

Where a mitigation measure includes the words "shall" or "will," inclusion of that measure in Planned Action Project application plans is mandatory in order to qualify as a Planned Action Project. Where "should" or "would" appear, the mitigation measure may be considered by the project applicant as a source of additional mitigation, as feasible or necessary, to ensure that a project qualifies as a Planned Action Project. Unless stated specifically otherwise, the mitigation measures that require preparation of plans, conduct of studies, construction of improvements, conduct of maintenance activities, etc., are the responsibility of the applicant or designee to fund and/or perform.

The City's SEPA Responsible Official's authorized designee shall determine consistency with this mitigation document.

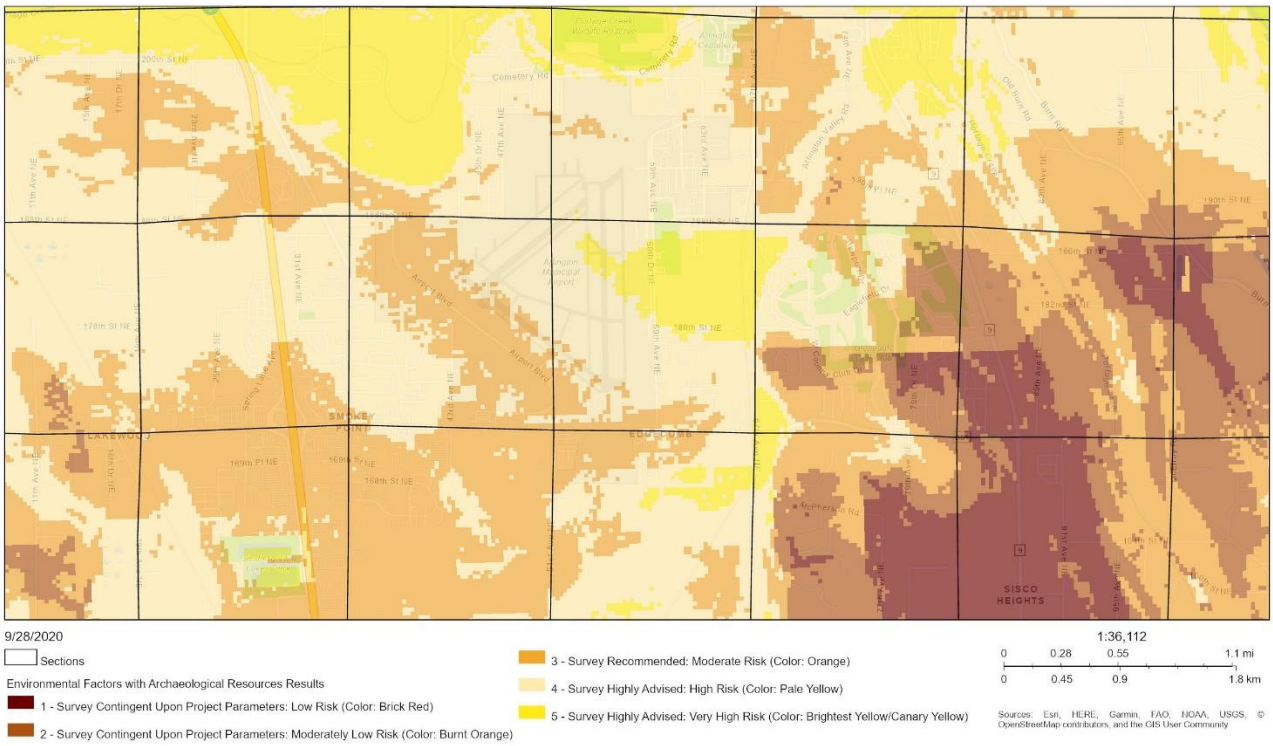
Natural Environment

1. Planned Actions shall be consistent with subarea plan dimensional and development standards including maximum impervious coverages.
2. Planned Actions shall be consistent with the relocation of Edgecomb Creek and associated habitat improvements.
3. Planned Actions shall implement required street frontages identified in the Arlington Complete Streets Program, including landscaping and green infrastructure.
4. Planned Actions may incorporate green stormwater retrofits that provide water quality benefits beyond standard requirements by code.

Cultural Resources

5. Within shoreline jurisdiction, Planned Actions must be consistent with cultural resources policies and regulations.
6. Planned Action notices shall be sent to DAHP and tribes (Snohomish Tribe, Stillaguamish Indian Tribe, and Tulalip Tribes) for each application consistent with Section G of the ordinance.
7. If DAHP predictive model maps location as high to very high probability (Map B-1.1):
    a. If cultural resources survey not previously completed, conduct cultural resources survey including subsurface testing where feasible and documentation of historic (i.e. 50 years old or older) built environment in advance of construction. Survey report will include inadvertent discovery plan (IDP).
    b. If cultural resources survey of the location completed more than 10 years ago, an updated report including IDP may be needed.
    c. If cultural resources survey of the location completed within past 10 years, prepare an IDP.
8. If DAHP predictive model maps location as low to moderate probability (Map B-1.1):
    a. If cultural resources survey not previously completed, conduct cultural resources desktop review and field reconnaissance including documentation of historic (i.e. 50 years old or older) built environment in advance of construction. Report will include inadvertent discovery plan (IDP).
    b. If cultural resources review completed for the location more than 10 years ago, an updated desktop review including IDP may be needed.
    c. If cultural resources survey of the location completed within past 10 years, prepare an IDP.
9. Where required under Mitigation Measures 7 and 8, Planned Actions shall prepare Inadvertent Discovery Plans as a condition of project approval.
10. The City may condition Planned Actions according to the results of required reviews under Mitigation Measures 7 and 8.

Map B-1.1 Cultural Resources Probability Department of Archaeology and Historic Preservation



Land Use and Aesthetics

11. Planned Actions shall be consistent with the AMC development standards and guidelines for the CIC.
12. Planned Actions shall implement design standards specific to industrial areas and development types.

Transportation

13. See Exhibit B-3.

Public Services

14. Planned Actions shall demonstrate consistency with crime prevention through environmental design principles through compliance with CIC development standards and guidelines.
15. Planned Actions shall pay applicable impact fees per Chapter 20.90 for parks and schools.
16. A Planned Action shall provide the common and private open space required per dwelling in the Arlington Municipal Code.

Utilities

17. Planned Actions shall meet City standards for adequate water and sewer service, pay applicable general facility charges, and incorporate water and sewer infrastructure improvements in street frontage improvements as appropriate.
18. Planned Action shall implement the required stormwater manual and implement necessary stormwater improvements. If a regional stormwater facility is approved by the City, an applicant may request or the City may condition development to

pay a fee based on the area of new and replaced impervious surface subject to the applicable stormwater management manual in place at the time of application.

EXHIBIT B-3 ADDITIONAL MITIGATION REQUIREMENTS & PROCEDURES

Transportation

Frontage Improvements

A. When a property redevelops and applies for permits, frontage improvements (or in-lieu contributions) and right-of-way dedications if needed are required by the Arlington Municipal Code (AMC 20.56.170).

B. If right-of-way (or an easement) is needed, it also must be dedicated to the City by the Planned Action Application property owner.

C. Planned Action applicants may request and the City may consider a fee-in-lieu for some or all of the frontage improvements that are the responsibility of the property owner consistent with criteria in AMC 20.56.170 and agreements pursuant to RCW 82.02.020 or other instrument deemed acceptable to the City and applicant.

Mitigation Fees

D. Areawide Improvements: Implementation of improvements identified in Table B.3-1 shall occur through a SEPA fair share fee program such that new development contributes its share of the cost for these projects.

E. Cost Basis: Unless amended, or replaced with a transportation impact fee, mitigation fees consistent with the proportionate share of costs shall be applied to planned action applications. This fee shall be payable in addition to the impact fee in AMC Chapter 20.90 until such time as the improvements in Table B.3-1 are incorporated into the City's impact fee basis.

F. A Planned Action's trips calculated per Section 4.D(3)(d) will be used to determine a development's demand and mitigation payment.

G. Mitigation Fee Payable at Permit Issuance: The mitigation fee shall be payable at the time of building permit issuance.

H. The Planned Action Share Transportation Fees will be incorporated into the City master fee schedule. Fees shall be subject to biennial review to affirm the cost basis including a construction cost index or an equivalent as determined by the City.

I. Should the State of Washington develop capital improvements that are scheduled in addition to the listed mitigation in Table B.3-1, the City may collect a fair share cost of such improvements to the extent the improvements add capacity to address growth.

Transportation Demand Management

J. Each Planned Action shall demonstrate consistency with requirements for Commute Trip Reduction (AMC Chapter 10.80). The City may condition Planned Actions to provide for transportation demand management measures to assist in meeting City levels of service and concurrency.

K. Each Planned Action shall provide for electric vehicle infrastructure (AMC Chapter 20.44.098).

Table B.3 -1. Summary of Mitigation and Action Alternative Pro-Rata Cost

Location	Improvement	Estimated Total Cost (Million $)[1]	Existing Intersection Vehicle Volumes[2]	2040 Preferred Alternative Intersection Vehicle Volumes[2]	Total Volume Increase[3]	Percent Pro-Rata Share[4]	Pro-Rata Cost (Million $)[5]
SR 531 between 43rd Avenue NE and 67th Avenue NE	Widening SR 531 from 2 to 4-lanes with intersection improvements such as roundabouts at major intersections. Multiuse paths constructed along SR 531	$39.3	10,660	14,330	3,670	25.6%	$10.061
SR 531 between 67th Avenue NE and SR 9		$45.0	3,660	5,775	2,115	36.6%	$16.470
67th Avenue NE/188th Street NE	Installation of traffic signal and railroad crossing improvements	$3.1	1,120	1,760	640	36.4%	$1.128
I-5/SR 531 Interchange	Specific intersection improvements are being reviewed with the City of Arlington as part of a development application	TBD	8,505	10,425	1,920	18.4%	TBD
Smokey Point Blvd/SR 531		TBD	4,480	5,260	780	14.8%	TBD
Total		**$87.4**					**$27.659**

Source: Transpo Group, 2020

TBD = To be determined when the specific improvement is identified.

1. SR 531 43rd Avenue NE to 67th Avenue NE project cost based on WSDOT published as of September 25, 2020 https://wsdot.wa.gov/projects/sr531/43rd-ave-67th-ave/home. SR 531 67th Avenue NE to SR 9 project cost based on City of Arlington Six-Year Transportation Improvement Program 2019-2024. Intersection improvement cost 67th Avenue NE/188th Street NE based on estimates prepared by Transpo Group.
2. Volumes for SR 531 are total entering volumes for the major intersections.
3. 2040 Preferred Alternative intersection vehicle volumes – existing intersection vehicle volumes
4. Project trips / 2040 Preferred Alternative intersection vehicle volumes.

Considering the total pro-rata cost of the CIC Preferred Alternative of $27.659 million and the 4,735 trip increase (compared to existing trips[1]), the fee per trip would be $5,841.39 based on the current information. The cost will be adjusted when improvements are determined for the I-5/SR 531 Interchange and Smokey Point Blvd NE/SR 531 intersection.

[1] Approximately 3,170 existing weekday PM peak hour trips are generated by the CIC compared to 7,905 total weekday PM peak hour trips for the Preferred Alternative.

EXHIBIT B-4 APPLICABLE REGULATIONS AND ADVISORY NOTES

In addition to the AMMIC Subarea Plan goals and policies and the Arlington Land Use Code development regulations, the following regulations may apply. All applicable local, state, and federal requirements shall be met regardless of whether they are highlighted in this Exhibit or not.

Natural Environment

Development and redevelopment projects within the study area that have the potential to impact environmentally sensitive natural resources will require compliance with federal, state, and local regulations. Mitigation sequencing to avoid, minimize, and mitigate environmental impacts is typically required for all applicable permitting reviews and authorizations. The table below provides a regulatory permit matrix for actions requiring local, state, and federal authorizations. Appropriate mitigation measures specific to project alternatives will need to be proposed when alternatives are farther along in the planning process. This may include preservation, enhancement, and restoration of wetland and marine shoreline buffer.

Table B.4-1. Environmental Regulations

Jurisdictional Agency	Regulations/Authorizations
City of Arlington	Pre-application submittal conference SEPA Determination (No Action Alternative) Planned Action Consistency Determination (Action Alternatives) Critical Areas review City of Arlington Stormwater Code Compliance
Washington State Department of Ecology	CWA Section 401 Water Quality Certification NPDES Construction Stormwater General Permit Coastal Zone Management Act Consistency Certification
Washington Department of Fish and Wildlife	Hydraulic Project Approval (HPA)
U.S. Army Corps of Engineers	CWA Section 404 Clean Water Act CWA Section 10 Rivers and Harbors Act Requires Compliance with: Section 7 of the Endangered Species Act Section 106 of the Historic Preservation Act Magnuson-Stevens Act

Sources: City of Arlington Municipal Code; Herrera 2020.

Land Use and Aesthetics

Arlington's Municipal Code contains regulations that help to ensure land use compatibility.

- Title 20 Land Use Code.
- Arlington Design Standards (Chapter 20.46 AMC).
- Arlington Shoreline Master Program (SMP).
- Airport Master Plan: contains regulations applicable to Flightline zone areas.

Cultural Resources

In terms of historic and cultural resources the following local, state, and federal laws or rules apply:

- Arlington's SMP includes policies and regulations that would require appropriate cultural review by tribal and other agencies.
- State funded capital projects require Governor's Executive Order 0505 review. Implementation of the Executive Order requires all state agencies implementing or assisting capital projects using funds appropriated in the State's biennial Capital Budget to consider how future proposed projects may impact significant cultural and historic places.
- Section 106 of the National Historic Preservation Act requires that each federal agency identify and assess the effects its actions may have on historic buildings.

Transportation

The following regulations address transportation:

- Travel Demand Management (TDM): Washington State Commute Trip Reduction (CTR) law requires employers with 100 or more employees and located in high-population counties to implement TDM programs.
- Arlington Complete Streets Program
- Arlington Transportation Improvement Program and Capital Improvement Program
- The following regulations and standards:
  - AMC Chapter 10.80 - Commute Trip Reduction
  - AMC Chapter 20.56 - Streets and Sidewalks
  - Chapter 20.90 - Concurrency and Impact Fees
  - Arlington Engineering Standards
  - AMC Chapter 20.44.098 – Electric Vehicle Infrastructure

Public Services

The following regulations address public services:

- Comprehensive Plan – Addresses levels of service and capital improvements for fire, police, and parks. This is updated every eight years with the Comprehensive Plan.
- Title 15 Fire – Includes requirements for fire suppression.
- Parks and Recreation Master Plan– Establishes a plan for 2016-2023 including capital projects.
- Arlington School District Levy 2020 – Addresses Capital Replacement projects to ensure proper function of current schools.

Utilities

Water

When evaluating new construction, Arlington Public Works and Utilities Department personnel determine the ability of the water system to meet fire flow requirements at that location with a minimum of 20 psi residual pressure throughout the distribution system. If the water system cannot provide the required fire flow for the specific project, the developer is required to revise building construction and/or make the necessary improvements to the distribution system to meet the project's fire flow requirements as established by the City Fire Chief. The available fire flow will be determined by the City's engineering staff using the water system hydraulic model.

AMC Chapter13.08. includes provisions for service connections and mains to be upgraded by developers during redevelopment if required to meet engineering design and construction standards. Chapter 13.08. also includes provisions for installation of pumps if required to achieve adequate pressure during peak demands.

Wastewater

AMC Chapter 13.36 includes provisions for wastewater service connections and extensions when existing connections are inadequate or sewer mains are not present along the frontage of a property.

Stormwater

AMC Chapter 13.28 includes provisions that require redevelopment to meet stormwater management requirements of the Stormwater Management Manual for Western Washington, which requires low impact development BMPs, flow control, and water quality treatment. Under all the alternatives these requirements are expected to result in a net improvement in the quality of stormwater that is discharged to the Stillaguamish River and Quilceda Creek via ditches, Hayho Creek, Westphal Creek, Portage Creek, Prairie Creek and Edgecomb Creek.

C Comment Letter

Washington State Department of Transportation

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October 28, 2020

Marc Hayes, Director
Arlington Department of Community & Economic Development
18204 – 59th Drive NE
Arlington, WA 98223
Sent via email to: MHayes@arlingtonwa.gov

Cascade Industrial Center Draft EIS Comments

Dear Mr. Hayes:

Thank you for the opportunity to provide comments on the Cascade Industrial Center Draft EIS. The Arlington CIC is an area encompassing 2300 acres adjacent to one of the most congested segments of I-5. Also currently congested in proximity to the subarea are State Routes (SR) 9, SR 530, and SR 531. Based on the draft EIS, Alternative 2 could generate up to 8,844 new jobs, almost three times the existing. WSDOT therefore expects significant adverse environmental impacts to transportation will occur on I-5 and SR 9, SR 530, and SR 531.

We appreciate the opportunity to collaborate with you and your team during the EIS scoping period. Also, we appreciate the opportunity to review the draft transportation section ahead of the issuance of the DEIS. Thank you for addressing some of our earlier comments. However, we are concerned that several of our comments remain unaddressed and are summarized below:

1. On page 3-55 of the Arlington DEIS it is stated: "The SimTraffic microsimulation model was calibrated to the traffic operation condition on a typical weekday based on Google Map Traffic." On page 3-55 and page 3-56, it is mentioned: "Transpo adjusted the SimTraffic settings to be consistent with the vehicle queuing/congestion patterns from the Google Traffic Map historical data." However, no supporting information is provided nor a description of the settings that were adjusted. This is information that is needed to support the findings that are presented.

2. Synchro is not the appropriate analysis tool for roundabout operation, operational evaluation of any roundabout intersection would need to be performed in Sidra. WSDOT was provided Sidra reports for the existing SR 9 / SR 531 roundabout intersection, but not for the 4 intersections that will be improved as part of the WSDOT SR 531 – 43rd to 67th project. Synchro results for the mitigated scenario (with roundabouts) are not acceptable. The 2040 Action Alternative 2 "mitigated"

Synchro model shows traffic signals at 43rd, 51st, 59th and 67th rather than roundabouts.

3. Some methodology to compare corridor-wide operation, when there is a combination of signals, stop control and roundabouts, needs to be developed. Similar to above, the Synchro and SimTraffic output do not accurately reflect the expected future traffic controls at 4 intersections.

4. Potential impacts to the I-5 mainline need to be evaluated. Specifically, we request a review of potential queuing issues that might impact the I-5 mainline. This could be reported in terms of expected 95th % queue lengths, compared to available storage.

   We commend the City for its commitment through this project to create a multimodal environment in order to reduce single occupancy vehicles (SOVs). In addition, the city's proposal will add workforce housing to the area, which can result in employees living in closer proximity to their jobs, which can reduce trip distances, improve air quality and quality of life. These measures will likely help reduce travel in I-5 and increase use of non-auto modes. However, a review of potential queuing issues that might impact the I-5 mainline is needed for a better understanding of the potential impacts.

5. There is not a clear list of the intended mitigation measures. A discussion is needed of additional mitigation measures, particularly at the I-5 interchange ramp terminals and SR 531 / Smokey Pt Blvd.

WSDOT Aviation has reviewed the Draft EIS and offers the following comments for consideration.

Aviation Division fully supports the development of commercial/industrial facility in the airport industrial park in Arlington, Washington. This proposal is consistent with WSDOT's Airport and Compatible Land Use Guidebook for airports and does not impede the Arlington Municipal Airport's traffic pattern nor the FAA airspace structure. Special attention should be paid to ensure that this project does not create a height hazard obstruction, smoke, glare, electronic, wildlife attractants or other airspace hazards.

Please contact me at 425-272-3864 or AlamN@wsdot.wa.gov if you would like to discuss further or have any questions.

Sincerely,

Nazmul Alam

Nazmul Alam
Corridor Planning Manager, WSDOT Management of Mobility Division

cc: Mike Koidal, WSDOT
Cameron Kukes, WSDOT
Ramin Pazooki, WSDOT
Max Platts, WSDOT Aviation
Robin Mayhew, WSDOT
Barbara Briggs, WSDOT
Commerce Review Team
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David Palay, Attorney General's Office