



1 **PLANNED ACTION**

2 The City Center Sub-Area Plan SEIS envisioned that it (Lynnwood City Center Sub-  
3 Area Plan SEIS) would be the basis for and support a planned action ordinance for the  
4 Lynnwood City Center. A planned action ordinance has not been adopted since the  
5 time of the City Center Sub-Area Plan Final SEIS issuance. The City of Lynnwood now  
6 desires to move ahead with the adoption of a planned action ordinance for the City  
7 Center.

8  
9 Washington Administrative Code (WAC) 197-11-164 provides for definitions and criteria  
10 for a planned action and states

11 **“WAC 197-11-164 - Planned actions — Definition and criteria**

12  
13  
14 “(1) Under RCW 43.21C.031, GMA counties/cities may designate a planned action. A planned  
15 action means one or more types of project action that:

16  
17 “(a) Are designated planned actions by an ordinance or resolution adopted by a GMA  
18 county/city;

19 “(b) Have had the significant environmental impacts adequately addressed in an EIS  
20 prepared in conjunction with:

21  
22 “(i) A comprehensive plan or subarea plan adopted under chapter 36.70A RCW; or

23  
24 “(ii) A fully contained community, a master planned resort, a master planned  
25 development, or a phased project;

26  
27 “(c) Are subsequent or implementing projects for the proposals listed in (b) of this  
28 subsection;

29 “(d) Are located within an urban growth area, as defined in RCW 36.70A.030, or are  
30 located within a master planned resort;

31 “(e) Are not essential public facilities, as defined in RCW 36.70A.200; and

32 “(f) Are consistent with a comprehensive plan adopted under chapter 36.70A RCW.  
33

34 “(2) A GMA county/city shall limit planned actions to certain types of development or to specific  
35 geographical areas that are less extensive than the jurisdictional boundaries of the GMA  
36 county/city.

37  
38 “(3) A GMA county/city may limit a planned action to a time period identified in the EIS or the  
39 designating ordinance or resolution adopted under WAC 197-11-168.”  
40

41 Consistent with WAC 197-11-164, the City of Lynnwood is required to plan under the  
42 Growth Management Act (GMA) and has prepared a FSEIS in conjunction with a sub-  
43 area plan. Significant adverse environmental impacts were addressed in the FSEIS.  
44

45 Studies and reports prepared since the time of the FSEIS’ issuance have provided even  
46 greater clarity on environmental impacts of the proposed action. Adopted plans and  
47 development regulations since FSEIS issuance have similarly addressed environmental  
48 issues associated with City Center development.  
49

1 These studies, reports and ordinances bring the SEIS up to date and confirm that  
2 environmental impacts are adequately addressed to support the adoption of a planned  
3 action ordinance.

4  
5  
6 **UPDATES TO CITY CENTER ZONING REGULATIONS AND DESIGN GUIDELINES**

7 Concurrent with consideration of the planned action designation, the City is proposing  
8 updates to the zoning regulations for the City Center (primarily codified in Chapter 21.60  
9 of the Lynnwood Municipal Code (LMC)) and the City Center Design Guidelines  
10 (adopted by reference in LMC 21.60.600). These amendments include, but are not  
11 limited to, accomplishing the following purposes:

- 12
- 13 • Revise requirements in Ordinance No. 2627 for dedication of right-of-way for grid  
14 streets by removing certain future streets;
  - 15 • Revise requirement for showing consistency of project design review applications  
16 with the planned locations of parks in LMC 21.60.600;
  - 17 • Revise the factors and incentive rates in the floor-area ratio bonus system in  
18 LMC 21.60.400;
  - 19 • Revise other provisions in the City Center District (LMC Chapter 21.60) including,  
20 but not limited to, use limitations, basic development standards, street types, design  
21 review, and non-conforming provisions.
  - 22 • Revise the City Center Design Guidelines.
  - 23 • Amend the City of Lynnwood zoning map to identify prominent intersections and  
24 gateways within the City Center.
- 25

26  
27 **REASON FOR ADDENDUM**

28 As indicated earlier, the City of Lynnwood intends to adopt a planned action ordinance  
29 and to amend development regulations and guidelines for the City Center.

30  
31 WAC 197-11-706 defines an "Addendum" as,

32  
33 "Addendum" means an environmental document used to provide additional information  
34 or analysis that does not substantially change the analysis of significant impacts and  
35 alternatives in the existing environmental document. The term does not include  
36 supplemental EISs. An addendum may be used at any time during the SEPA process.

37  
38 This addendum documents additional information from certain studies, reports and/or  
39 ordinances related to certain elements of the environment since FSEIS issuance in  
40 2004. It analyzes whether or not the environmental analysis of the FSEIS is still current  
41 and can serve as the environmental documentation for the adoption of a planned action  
42 ordinance and the regulations and guidelines amendments.

43  
44  
45 **ANALYSIS**

46 Four issues have been identified as necessitating updating since the issuance of the  
47 City Center Sub-Area Plan FSEIS. These include:

1  
2 **1. Storm Drainage**

3 The City Center Sub-Area Plan SEIS envisioned the City's adoption of  
4 Department of Ecology requirements for stormwater management. This has  
5 since been done.  
6

7 **2. Greenhouse Gas Emissions**

8 Since the SEIS issuance, the Department of Ecology (DOE) has responded to  
9 environmental concerns regarding greenhouse gas emissions. DOE has issued  
10 a guidance document ("State Actions to Reduce Greenhouse Gas Emissions")  
11 and a working paper of "Greenhouse Gas Emissions and SEPA" that suggest  
12 and recommend that greenhouse gas issues and concerns should be discussed  
13 in SEPA documents. DOE has begun to draft guidance documents for lead  
14 agency use of SEPA to evaluate greenhouse gas emissions.  
15

16 A study has been prepared that specifically evaluates the City Center Sub-Area  
17 Plan and greenhouse gas impacts.  
18

19 **3. Transportation**

20 Further studies to evaluate and refine the City Center Sub-Area transportation  
21 system have been prepared since completion of the City Center Sub-Area Plan  
22 SEIS. These studies have resulted in revised conclusions as to street capacity  
23 needs within the City Center Sub-Area as well as modifications to certain  
24 improvements (particularly the grid street network) needed to support City Center  
25 development. In addition, the City has recently adopted a transportation impact  
26 fee ordinance (that became effective January 1, 2011) and updated its  
27 concurrency management program (in 2008).  
28

29 **4. Utilities (Sewer, Water, Storm)**

30 The additional studies of transportation issues and impacts have recommended  
31 revisions to the grid street network in the City Center. As the discussions of  
32 increasing sewer, water and storm utility service capacity recommended  
33 installing new mains in the grid streets, the question was asked whether the new  
34 grid street network could accommodate new mains that would meet the service  
35 requirements of redevelopment of the City Center.  
36

37 Each of these elements of the environment is discussed in greater detail below.  
38

39 **Storm Drainage**

40 In 2007, the Washington State Department of Ecology (DOE) initiated the National  
41 Pollutant Discharge Elimination System (NPDES) Phase II Municipal Stormwater  
42 Permit. This permit requirement established a phased-in timeline for actions that the  
43 City of Lynnwood and other cities were required to take, including adopting stricter  
44 regulations regarding management of stormwater from new and redevelopment projects  
45 as well as regulating illicit discharges.  
46

1 Water quality is the primary focus of the NPDES Phase II Permit. The regulations  
2 contain a detailed list of prohibited discharges, require best management practices for  
3 pollutant handlers, and require spill control and response plans of certain businesses.  
4

5 The City of Lynnwood has responded to this requirement. On May 10, 2010 the  
6 Lynnwood City Council adopted Ordinance No. 2834 and Ordinance No. 2835, both  
7 related to stormwater management and both bringing the City into compliance with the  
8 Phase II Municipal Stormwater Permit requirement.  
9

10 Prior to the adoption of these ordinances, the City of Lynnwood's stormwater  
11 regulations dated back to 1989, and did not comply with the requirements of the NPDES  
12 Phase II Permit. (The City had been using the "substantive authority" in SEPA to  
13 require mitigation of potential stormwater impacts, in a manner that was consistent with  
14 DOE regulations.)  
15

16 The City Center Sub-Area Plan SEIS envisioned that the City would adopt new  
17 stormwater regulations. The DSEIS states, as one drainage mitigation measure,  
18

19 "Require that new streets, open space and private redevelopment projects comply with  
20 the adopted City of Lynnwood standards and/or DOE requirements for stormwater  
21 detention and treatment. It is assumed that the City will adopt and implement DOE  
22 requirements in connection with City Center redevelopment." Page III-81)  
23

24 With the adoption of Ordinance No. 2834 and Ordinance No. 2835 the City has adopted  
25 more restrictive stormwater management development regulations, consistent with DOE  
26 requirements, than existed at issuance of the City Center Sub-Area Plan SEIS.  
27 Stormwater impacts of City Center development will be mitigated through the  
28 application of these development standards to City Center redevelopment. Further, as  
29 the treatment standards in the DOE Manual are higher than those in effect when most  
30 of the City Center was developed, applying the requirements of the DOE Manual to  
31 redevelopment of the area will result in improved management of stormwater runoff  
32 from the City Center over current conditions.  
33

#### 34 **Greenhouse Gas Emissions**

35 Since the time of the City Center Sub-Area Plan's SEIS issuance in 2004, the  
36 Washington State Department of Ecology has responded to concerns regarding  
37 greenhouse gas emissions and has begun to draft guidance documents for lead agency  
38 use of SEPA to evaluate such impacts.

39 In recognition of potential impacts associated with greenhouse gas emissions, the City  
40 had a report entitled "City of Lynnwood - The City Center Vehicle-Miles Traveled and  
41 CO2 Emissions Modeling Report." (January 2010) prepared by David Evans and  
42 Associates. The report evaluates carbon dioxide (CO<sub>2</sub>) emission impacts from vehicle-  
43 miles traveled (VMT) based on assumptions in the City of Lynnwood Comprehensive  
44 Plan, including the City Center Sub-Area Plan.

45 Among the conclusions of the report are:

1 "The analysis demonstrates that the Build alternative would improve  
2 transportation efficiency for the surrounding region by concentrating jobs and  
3 homes in a high density urban center and reducing the need for residents to  
4 travel to neighboring cities for work, shopping, and other needs, which would  
5 thereby reduce future total VMT and CO2 emissions in the region compared to  
6 the No Build scenario".

7 The analysis in the David Evans and Associates report supports the conclusion  
8 that there is no adverse environmental impact of the proposed City Center  
9 development on greenhouse gas emissions. Rather, the development type  
10 envisioned under the City Center Plan lends itself to a reduction in greenhouse  
11 gas emissions over the SEIS No Build Alternative.

## 12 Transportation

13 Since SEIS issuance in 2004, the City of Lynnwood has conducted studies to refine the  
14 transportation network and improvement needs for the City Center. Two key studies  
15 include:

- 16 • Lynnwood City Center. City Center Street Master Plan. David Evans and Associates,  
17 Inc. December 2009.

18 This study provides further analysis of the street system, optimal location of the  
19 proposed street grid, and confidence that the street layout is operationally and physically  
20 feasible.

- 21 • City Center Access Study. Perteet Engineering. September 2007.

22 This study identifies concepts that would move local trips from the I-5 corridor and onto  
23 the local transportation system; selects concepts that would reduce congestion on the  
24 principal arterials with I-5 interchanges to relieve congestion at those interchanges; and  
25 identifies concepts that might improve the High Accident Corridor (HAC)/High Accident  
26 Locations (HAL) in the Study Area.

27 The conclusions of these studies are particularly relevant to one primary concept  
28 advanced in the City Center Sub-Area Plan and analyzed in the SEIS related to the City  
29 Center Secondary Street Network (discussed below).

30  
31 In addition to these two studies, in 2008, the City of Lynnwood amended the  
32 Comprehensive Plan to establish an updated citywide concurrency management  
33 program. In 2010 the City of Lynnwood adopted a traffic impact fee ordinance that went  
34 into effect January 1, 2011. Each of these items is discussed in greater detail below.

### 35 36 Secondary Street Network

37 The City Center Sub-Area Plan envisioned new secondary streets to improve circulation  
38 in the City Center and improve on pedestrian circulation. New secondary streets are  
39 identified as a key concept in the City Center Sub-Area Plan:

- 40  
41 "1. New Secondary Streets

1 Better circulation is the most important element for a City Center. An additional  
2 secondary street network should be introduced throughout the area to  
3 supplement the existing street pattern. This will add more east-west and north-  
4 south connections, reduce the length of city blocks, make the City Center more  
5 walkable and pedestrian-friendly, disperse the traffic from major arterials and  
6 provide more choices for circulating through the area.” (Page 15)  
7

8 The Lynnwood City Center Street Master Plan studied the secondary (“grid”) street  
9 network concept further. The report states,

- 10       ▪       Page 11: “**New Local Street Operational Analysis:** The new local streets proposed to  
11 provide access to parcels internal to the City Center Subarea are forecast to operate well  
12 below capacity, better than LOS E. The LOS E standard recommended in the SEIS  
13 requires intersection improvements typically calling for additional turn lanes at the  
14 intersections of the new local streets and the principle arterials. Intersections internal to  
15 the City Center subarea do not typically require additional turn lanes. The new local  
16 streets are effectively providing access to adjacent parcels and vehicles and non-  
17 motorized mobility. The operation of the new local streets for vehicles is anticipated to be  
18 right-in-right-out only at the intersections with the principle arterials. Left-turns into or out  
19 of the new local streets will be effectively impossible at principle arterials given the high  
20 traffic volumes on the principle arterial system.”
  
- 21       •       Page 14: “The new local streets anticipated for the City Center Street Master Plan; new  
22 access streets at the approximate locations of 41st Avenue W, 43rd Avenue W, 197th  
23 Street SW and 199th Street SW, provide access to individual buildings or parcels, create  
24 an urban setting, establish building frontages with streetscape access and provide non-  
25 motorized circulation internally in the City Center subarea. The provision of a more  
26 significant street at 42nd Avenue SW will provide the basic structure of the City Center  
27 street network
  
- 28       ▪       Page 24: “**High Priority Actions:**... The widening of 196th Street SW to provide added  
29 capacity near term and create an identity for the corridor... 194th Street SW extension...  
30 42nd Street W extension... 198th Street SW/Promenade”
  
- 31       ▪       Page 25: “**City Center Street Master Plan Roadway Improvements:**... Action: The  
32 conversion of the new local streets (41st Avenue W, 43rd Avenue W, SW 197th Street  
33 SW and SW 199th Street SW) in the Subarea to private roadways and access points with  
34 design standards related to non-motorized mobility is recommended. “  
35

36 The Lynnwood City Center Street Master Plan study concluded that two new secondary  
37 streets - 42<sup>nd</sup> Avenue West and 194<sup>th</sup> Street SW extension - were “system  
38 improvements” – both will be needed to address capacity within the City Center. The  
39 remainder of the new secondary streets (e.g. 41<sup>st</sup> Avenue W; 43<sup>rd</sup> Avenue W, etc.) are  
40 identified as “project improvements” – but are not necessary to support transportation  
41 capacity needs for the City Center. The City Center Street Master Plan study further  
42 recommended that the “project improvements” could be converted to private roadways  
43 and access points with design standards related to non-motorized mobility.  
44

45 Based on the City Center Street Master Plan study, the City Center goals for pedestrian  
46 orientation and access are now proposed to be met by code amendments that provide

1 for an alternate system of private roads and/or private walkways, protected by  
2 easements, allowing for more flexible development opportunities for property owners.

3  
4 Transportation capacity impacts are still addressed by leaving two future streets -  
5 42<sup>nd</sup> Avenue West and 194<sup>th</sup> Street SW (extended) subject to the requirements of the  
6 City Center Street Grid Protection ordinance (Ordinance No. 2627).

### 7 8 Impact Fee Ordinance

9 On September 13, 2010 the Lynnwood City Council adopted Ordinance No. 2850  
10 establishing a transportation impact fee system. (On November 29, 2010 the City  
11 Council adopted Ordinance No. 2869 amending Ordinance No. 2850 regarding the  
12 boundaries of areas of different impact fees. That amendment did not change the  
13 impact fee requirement for the City Center.)

14  
15 The calculation of the traffic impact fee includes City Center transportation projects and  
16 provides an additional funding mechanism for transportation improvements. Funding  
17 mechanisms for transportation improvements identified in the SEIS were general,  
18 stating that funding,

19  
20 "…will likely involve a combination of development regulations and standards,  
21 capital improvements, … Project-specific requirements could include payment of  
22 development fees, construction of improvements, dedication of land, and similar  
23 techniques. Project related conditions of approval/mitigation requirements will  
24 be identified in a planned action ordinance, if the City designates the city center  
25 Plan as a planned action, or in development regulations." (FSEIS, Page S-25).

26  
27 The City's adoption of a transportation impact fee ordinance is consistent with the City  
28 Center Sub-Area Plan FSEIS and the Plan's implementation concept.

### 29 30 Concurrency

31 The City Center Plan discussed traffic concurrency in accordance with the requirements  
32 of State law. In 2008 the City updated its concurrency management requirements as  
33 part of the City of Lynnwood Comprehensive Plan update (See City of Lynnwood  
34 Comprehensive Plan Transportation Element). The purpose of concurrency is to assure  
35 that those public facilities and services necessary to support development are adequate  
36 to serve that development at the time it is available for occupancy and use, without  
37 decreasing service levels below locally established minimum standards. Concurrency is  
38 required for locally owned transportation facilities.

39  
40 The City's concurrency management program is based on a system-level perspective -  
41 looking at the City as a whole rather than focusing exclusively on impacts to individual  
42 intersections. The travel experience is not defined by what happens at a single  
43 intersection but rather what occurs along the entire trip route. So as not to allow one  
44 congested intersection to stop all development in an area, the City's concurrency  
45 standard allows 20% of the City's *signalized* intersections to be below their associated  
46 level of service (LOS) before concurrency is considered to be failed. While the  
47 concurrency test is applied to signalized intersections, impacts on non-signalized

1 intersections are also evaluated. Impacts on non-signalized intersections may require  
2 additional analysis to determine if potential mitigation is required.

3  
4 The concurrency test is applied during the SEPA process. All developments generating  
5 ten or more peak hour trips are evaluated for traffic impacts during the SEPA process.  
6 All developments generating ten or more peak hour trips are evaluated for traffic  
7 impacts during the SEPA process.

8  
9 The City Center FSEIS envisioned that certain transportation improvements would be  
10 necessary to maintain the adopted level of service and concurrency in the City Center.  
11 With the concurrency program adopted in the Comprehensive Plan, concurrency in the  
12 City Center is now evaluated on a Citywide basis. In 2009, the City identified a number  
13 of additional city-wide peak hour trips that could be added to the system before  
14 concurrency is threatened.

15  
16 The City is currently in the process of developing an updated concurrency management  
17 ordinance to include more formal provisions for capacity reservation, concurrency  
18 certificate issuance etc. It will also establish a non-SEPA based concurrency  
19 management system.

20  
21 Until such time an updated concurrency management ordinance is adopted, the City  
22 Center Planned Action Ordinance (if adopted prior to the adoption of the Concurrency  
23 Management Ordinance) will ensure City concurrency requirements are satisfied  
24 through a review of information provided in the SEPA checklist (or other project review  
25 form as specified in WAC 197-11-315, filed with the project application). Submittal of  
26 the SEPA checklist or other form will be a minimum requirement of City Center planned  
27 action projects. That information will identify additional peak hour trips generated by the  
28 development proposal and, if the additional peak hour trips stays below the maximum  
29 city-wide threshold, no further environmental review is required.

### 30 31 **Utilities (Sewer, water, storm)**

32 Public Works staff reviewed the conceptual plans for installing new mains for sewer,  
33 water and storm water service capacity in light of the changes to the proposed layout of  
34 public streets in the City Center. That review determined that the size of the pipes may  
35 need to be increased (to 12 inches from eight inches) but that in all other respects  
36 locating the new mains in the (reduced) set of public streets in the City Center would  
37 have no impact on providing these utility services to new development in the City  
38 Center. In addition, the upsizing of lines means that construction work needed for utility  
39 facilities will take place in a reduced number of streets. Utility related construction  
40 impacts and disruptions will be less than originally evaluated in the FSEIS.

41  
42 No change to the mitigation measures for these utilities is needed.

1 **CONCLUSION**

2 The Lynnwood Environmental Review Committee – the SEPA Responsible Official for  
3 the City – has determined that this addendum is appropriate to reflect changes and  
4 additional information prepared since the SEIS.  
5

6 Certain changes that have occurred since the time of the City Center Sub-Area Plan  
7 SEIS relate to regulatory changes anticipated in the SEIS rather than to changes in the  
8 City Center preferred alternative itself (i.e. there are no changes to the development  
9 assumptions in the 2004 SEIS). These regulatory changes have the effect of improving  
10 environmental impacts and/or facilitate implementation of the Plan.

11 Additional studies conducted since the time of the City Center Sub-Area Plan's issuance  
12 in 2004 have further documented no adverse environmental impacts (i.e. Greenhouse  
13 Gas emissions report (2010)) and/or that the proposal and/or mitigation identified in the  
14 SEIS are still applicable or even lessened (i.e. City Center Street Master Plan (2010)  
15 and City Center Access Study (2009).)

16 **PROJECT PROPONENT**

17 City of Lynnwood  
18  
19

20 **LEAD AGENCY**

21 City of Lynnwood  
22 4114 198<sup>th</sup> Street SW, Suite 7  
23 Lynnwood, WA  
24  
25

26 **COMMENT PERIOD**

27 No comment period is required for this addendum.  
28  
29

30 **APPEAL PERIOD**

31 There is no appeal period for an addendum.  
32  
33

34 **CIRCULATION**

35 This addendum is being circulated in accordance with WAC 197-11-625(4) (provide  
36 copies of the addendum to recipients of the prior SEIS) and WAC 197-11-630(3)(c)  
37 (when an addendum is being prepared and an existing EIS is being adopted, that the  
38 agency shall include the statement of adoption with the addendum and circulate both as  
39 in subsection 197-11-630(3)(a)).  
40  
41

42 **SEPA RESPONSIBLE OFFICIAL**

43 Lynnwood Environmental Review Committee:  
44

NAME	POSITION	SIGNATURE
Kevin Garrett, AICP	Planning Manager	
Arnold Kay, PE	Development Services Supervisor	
Laurie Cowan	Parks Planner	
Community Representative	VACANT	

1

2

DATE OF SIGNATURE: May 24, 2011