

City of Arlington | Island Crossing Subarea

PLANNED ACTION DRAFT ENVIRONMENTAL IMPACT STATEMENT

Volume 1

DRAFT August 2025

City of Arlington





City of Arlington

Community & Economic Development

August 1, 2025

Subject: City of Arlington Island Crossing Subarea Plan and Planned Action Environmental Impact Statement

Dear Reader,

The City of Arlington has developed a Subarea Plan and has completed a programmatic Draft Environmental Impact Statement (DEIS) analyzing a potential impacts from implementation of the plan. The DEIS is being published for public and agency review and is available here: <https://www.arlingtonwa.gov/867/Island-Crossing-Subarea-Plan>.

As the City creates new subarea plans it is important to understand how the subarea fits into the City's and Snohomish County's long-term plans for growth, employment, and infrastructure investments and what environmental impacts may occur from such growth.

The EIS analyzes three different alternatives for the subarea:

- **Alternative 1:** No Action – Existing codes remain in place and no new infrastructure projects except what is planned in the Transportation Master Plan and utilities comprehensive plans.
- **Alternative 2:** Subarea Plan Partial Implementation – Implementation of development code changes proposed in draft Island Crossing Subarea Plan, but additional infrastructure investments.
- **Alternative 3:** Subarea Plan Full Implementation – Implementation of development code changes and infrastructure projects proposed in draft Island Crossing Subarea Plan.

A programmatic environmental impact statement provides a broad assessment of potential environmental impacts that may occur related to various planning policies and planning-level decisions. The DEIS analyzes potential impacts related to the following topics: Land Use and Urban Form, Transportation, Natural Environment, Water, and Utilities.

Analysis of a “No Action” Alternative (Alternative 1) is required under the Washington State Environmental Policy Act (SEPA). In this case, “no action” means that the draft Subarea Plan would not be adopted. Analysis under this alternative provides the opportunity to understand what the consequences may be if no action is taken. Alternative 1 also assumes that policy and zoning changes would be made in compliance with recent state legislation, including updates to parking requirements and design standards.

Please see the Fact Sheet for more information about to get involved in the planning process. Thank you for your interest in the Island Crossing Subarea Plan and DEIS.

Sincerely,



Amy Rusko, Community & Economic Development Director and SEPA Official

Fact Sheet

Project Title

Island Crossing Planned Action

Proposed Action and Alternatives

The City of Arlington is conducting a subarea planning process in Island Crossing to position the area for economic growth, address flooding hazards, and strengthen connections to Stillaguamish Valley agricultural heritage. The City is proposing to adopt a Subarea Plan and development regulations for the subarea.

The City is also considering adoption of a Planned Action Ordinance under RCW 43.21C.440 and associated SEPA Rules in WAC 197-11. Future proposals consistent with a Planned Action Ordinance, Subarea Plan, and development regulations would have a streamlined environmental review and permitting process.

The Planned Action EIS reviews current plans and regulations (No Action Alternative required under the State Environmental Policy Act or SEPA) and two action alternatives: Alternative 2, which would implement some of the subarea features, and Alternative 3, which would fully implement the Subarea Plan.

Proponent and Lead Agency

City of Arlington

Location

Island Crossing is located in northwest Arlington in a triangular area bounded by I-5 to the west and Smokey Point Blvd and 27th Ave NE to the east, with the northern boundary running about 800 feet north of SR 530. The subarea comprises the City of Arlington area northwest of the point 48°10'40"N 122°11'36"W.

Tentative Date of implementation/Action

Fall 2025

Responsible SEPA Official

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Required Approvals

The following City of Arlington actions would be required to implement the Proposal:

- Adoption of Island Crossing Subarea Plan and associated amendments to the Comprehensive Plan
- Adoption of Zoning and Development Regulation Amendments
- Adoption of a Planned Action ordinance

Prior to City action, the State of Washington Department of Commerce will coordinate state agency review of the legislative proposal.

After City action, the likely permits to be acquired by individual development proposals include but are not limited to land use permits, construction permits, building permits, and right-of-way use permits. These include documentation on how the development proposal meets AMC 20.64 - Floodplain Development Regulations, along with Tribal, County, and State regulations.

Principal EIS Authors and Contributors

Under the direction of City of Arlington Community and Economic Development, the team prepared the EIS as follows:

- [MAKERS](#): Land use and urban form: Relationship to land use plans, policies, and regulations; aesthetics/scenic resources
- [Transpo Group](#): Transportation
- [Herrera](#): Water, natural environment
- City of Arlington Community and Economic Development: Utilities

Draft EIS Date of Issuance

August 1, 2025

Draft EIS Comment Period

The City of Arlington is requesting comments from citizens, agencies, tribes, and all interested parties on the Draft EIS from August 1, 2025 to September 2, 2025. Comments are due by **September 2, 2025 at 5:00 pm**.

All written comments should be directed to:

Amy Rusko
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18204 59th Ave NE, Arlington, WA 98223
360-403-3550
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Submittal of comments by email is preferred. Please include in the subject line “Island Crossing Subarea DEIS Comments.”

Prior Environmental Review

The City of Arlington developed an EIS in association with its Comprehensive Plan in 2024. See the [Comprehensive Plan Appendix O: Final Environmental Impact Statement](#).

Location of Background Data

You may review the project website for more information at the project website below. If you desire clarification or have questions, please see the contact person above.

Purchase/Availability of Draft EIS

This Draft EIS is posted on the website below. Thumb drives or print copies of the document are available for purchase at cost at City of Arlington, Community and Economic Development, 18204 59th Avenue NE Arlington, WA, 98233

Please arrange the copies with the contact person above.

Project website: <https://www.arlingtonwa.gov/867/Island-Crossing-Subarea-Plan>

Distribution List

The following agencies and organizations are receiving a notice that the Draft Environmental Impact Statement is available for review.

Federal & Tribal Agencies

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

State Agencies

- Department of Agriculture
- Department of Archaeology and Historic Preservation
- Department of Commerce
- Department of Corrections
- Department of Ecology
- Department of Fish and Wildlife
- Department of Health
- Department of Natural Resources
- Department of Social and Health Services
- Department of Transportation
- Department of Transportation - Management of Mobility Division
- Energy Facility Site Evaluation Council (EFSEC)

- Farm Bureau
- Parks and Recreation Commission
- Puget Sound Partnership
- Puget Sound Regional Council
- WSDOT Aviation Division

Regional & County Agencies

- Snohomish County – Agriculture
- Snohomish County – Public Works
- Snohomish County – Parks
- Snohomish County – Planning
- Snohomish County – Surface Water Management

Arlington, Adjacent Jurisdictions, Service Providers

- Arlington Police Department
- Arlington School District
- North County Regional Fire Authority
- Snohomish County PUD
- Snohomish Health District
- Waste Management

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1 Summary

1.1 Purpose

The City of Arlington Comprehensive Plan, *Arlington in Motion 2024 & Beyond*, was adopted in December 2024. The plan identifies Island Crossing as one of Arlington's fourteen designated subarea with the potential to become a unique economic and cultural hub. Subareas are intended to serve both residents of both nearby areas and the broader region.

In 2024, the City of Arlington began conducting a community planning process for Island Crossing to guide its transformation from a convenience stop into a celebrated, safe, and well-connected gateway to the Stillaguamish Valley. The Island Crossing Subarea Plan (Subarea Plan) is intended to: (1) satisfy the requirements of the state's Growth Management Act (GMA) for Arlington to plan for forecasted growth; (2) support the goals of Arlington's Comprehensive Plan; and (3) comply with Arlington Municipal Code (AMC) 20.44.032 – Subarea plans. Once adopted, the Subarea Plan will be integrated into the City's development code and guide future land use decisions.

As part of the planning process, and consistent with the State Environmental Policy Act (SEPA) rules, the City intends to adopt a Planned Action Ordinance, which would streamline environmental review of development proposals when consistent with the proposed Island Crossing Subarea Plan and Planned Action Ordinance.

The following alternatives are different approaches to achieve the proposal's objective and serve as the basis for environment analysis. The three alternatives under consideration in this EIS are described in Section 2.5.2 and summarized below:

- **Alternative 1: No Action.** Maintains current Highway Commercial zoning and Mixed Use and Flood District overlays. City commitments and capital improvement plans would continue as planned over the next 20 years.
- **Alternative 2: Subarea Plan Partial Implementation.** Implement the land use and urban design, transportation, and public services and utilities actions of the Arlington Island Crossing Subarea Plan, but not the regional flooding/compensatory storage facility actions.
- **Alternative 3: Subarea Plan Full Implementation.** Include all other actions in Alternative 2, as well as investment in regional floodwater compensatory storage

infrastructure to address vulnerability to Stillaguamish River flooding and increase development capacity in the Subarea.

1.2 Study Area

The Island Crossing area (or Subarea), comprised of about 87 acres in northwest Arlington, is set within the Snohomish County agricultural and natural lands with views to the east of the Cascade Mountain Range. The Subarea is accessible from I-5 by exit 208, and serves as a gateway to the Stillaguamish Valley and Old Town Arlington by SR 530. The area is primarily auto-oriented commercial, with uses such as retail, gas stations, and truck stops. Several factors constrain development feasibility in the Subarea, particularly the floodplains, critical areas, and the Olympic Pipeline.

Exhibit 1.3.1-1 Island Crossing Site Plan



Source: MAKERS, 2024.

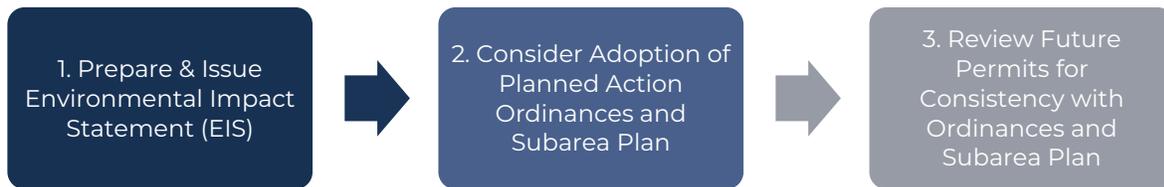
1.3 SEPA Process

1.3.1 Environmental Review

The City of Arlington is designating the Island Crossing Subarea as a Planned Action area under RCW 43.21C.440 and WAC 197-11-164. Instead of conducting project-by-project environmental reviews, this Environmental Impact Statement (EIS) provides a comprehensive, subarea-wide analysis to support adoption of a Planned Action Ordinance. The ordinance will establish mitigation requirements for both the City and future developers.

Development proposals that are consistent with the Planned Action Ordinance and Subarea Plan will not require a new SEPA threshold determination or additional environmental review of topics analyzed in the EIS. This process offers regulatory certainty, streamlines permitting, and advances the goals of SEPA and the GMA. Following completion of the EIS, the City will consider adoption of the Planned Action Ordinance and Subarea Plan. Future permits will be reviewed for consistency with these adopted plans.

Exhibit 1.6.1-1 Planned Action Process



1.3.2 Public Comment Opportunities

The City led community engagement activities and informal conversations from May 2024 through July 2025 to inform the Subarea Plan and the alternative concepts studied in the Draft EIS. These included several advisory and transportation technical group meetings and two community meetings. In June 2025, the city held a 21-day scoping comment period and community meeting. A public engagement summary is found in Section 2.4.

1.3.3 Elements not addressed

SEPA elements of the environment considered but not analyzed in this Draft EIS include the following:

- **Earth.** Consideration of landforms is integrated into the analysis of the Water element. As a floodplain environment, land and water constantly interact and intermingle in Island Crossing.

- **Air.** Air quality and Greenhouse gas emissions were not analyzed because the Subarea Plan alternatives are not expected to result in significant adverse impacts on Air.
- **Plants and Animals** are analyzed as part of the Natural Environment element.
- **Energy and Natural Resources.** The Subarea Plan does not anticipate significant changes to energy use outside of the range planned for by utility providers. **Electric power and natural gas** will be addressed in project-level SEPA review, and any properties with the Olympic Pipeline easement will coordinate with the Olympic Pipeline. Green energy facilities are encouraged in Island Crossing and their impact on the energy system would need to be determined at the project level.
- **Environmental Health** is considered in the Natural Environment element.
- **Shoreline Use.** There are no designated shorelines within the subarea. Flooding of the Stillaguamish River (a designated shoreline of the state) is addressed under Water.
- **Housing.** There are few housing units present in the subarea, which is designated for job growth under the Comprehensive Plan. New housing is not generally allowed in Island Crossing and under draft code implementing the Subarea Plan is proposed to be explicitly prohibited.
- **Light and glare.** Existing building and street standards prevent impacts from redevelopment.
- **Recreation.** No recreation amenities are present within the subarea at this time, therefore no impacts to recreation are expected. The Subarea Plan includes recommendations for recreation and open space improvements.
- **Historic and cultural preservation.** The area's rural aesthetic character is considered within the Land Use and Urban Form element, but historic and cultural preservation more broadly should be addressed with project-specific review.
- **Public services.** Drinking water, sewer, and stormwater facilities are addressed under the Utilities element. There are no expected significant adverse impacts on Public Services including Schools, Police, and Fire Emergency Services. Those public services continually plan for future growth in the subarea through their own planning efforts.

Scoping comments did not reveal any specific concerns other than those already planned for analysis. See Appendix A for the Scoping Notice & Comment Summary.

1.4 Objectives and Alternatives Summary

1.4.1 Objectives

SEPA requires a statement of objectives describing the purpose and need for the proposal. The following objectives apply to the alternatives evaluated in this EIS:

- Bring property and business owners, nearby residents, and other interested parties together to shape a shared vision for the future of Island Crossing compatible with the Arlington Comprehensive Plan.
- Evaluate environmental hazards, infrastructure needs, and growth potential, and align future infrastructure investment plans with the shared vision.
- Develop recommendations for new land use and zoning standards, design standards, and adjustments to other city regulations for City Council consideration.

1.4.2 Alternatives Summary

Alternatives represent different ways of achieving a project's purpose and serve as the basis for environmental analysis. Each alternative is evaluated for its potential impacts on elements of the environment such as water, habitats, land use, or transportation. The alternatives are described in greater detail in Chapter 2 of this Draft EIS.

Under SEPA, an EIS must include an alternative that represents “no action” and one or more alternatives that include changes to land use or policies, called the “Action Alternatives.” Action Alternatives allow the City to understand the impacts of a range of growth scenarios and test ideas, implications, benefits, impacts, and trade-offs of potential changes when compared to the No Action baseline.

This EIS analyzes three alternatives:

- Alternative 1: No Action assumes future development would occur within the Subarea based on the current Comprehensive Plan land use, zoning, and development standards.
- Alternative 2: Subarea Plan Partial Implementation would implement the land use and urban design, transportation, and public services and utilities actions of the Arlington Island Crossing Subarea Plan, but not the regional flooding/compensatory storage facility actions.

- Alternative 3: Subarea Plan Full Implementation includes all actions in Alternative 2, as well as investment in regional floodwater compensatory storage infrastructure to address vulnerability to Stillaguamish River flooding and increase development capacity in the subarea.

Analyzing different alternatives, and especially the differences among them, allows decision-makers and the public to compare the effects of different options and ultimately to select a Preferred Alternative. The alternatives are described in detail in Chapter 2, Description of Alternatives.

1.5 Key Issues & Options

Key issues facing Arlington decision makers include:

- Approval of a Subarea Plan Update including a vision, guiding principles, goals and strategies for land use, transportation, natural systems, public services and utilities, proposed infrastructure investments, and programmatic recommendations.
- Approval of a new set of development regulations.
- Level of growth to be included within the scope of a Planned Action.
- Type, location, cost, and financing of transportation, floodwater/stormwater, and park infrastructure.

1.6 Summary of Impacts & Mitigation Measures

This section highlights the alternative proposals' potential environmental impacts analyzed in this Draft EIS. See the complete discussion of the affected environment, impacts, and mitigation measures in Chapter 3.

1.6.1 Land Use & Urban Form

Exhibit 1.6.1-1 Summary of Potential Land Use and Urban Form Adverse Impacts and Mitigation Measures to Reduce Impacts

Alternative 1: No Action	
Impacts	<ul style="list-style-type: none"> ▪ Relationship to Existing Plans/Estimated Population & Employment: Projected job growth in Alternative 1 is much lower than the adopted growth targets in the Arlington Comprehensive Plan. ▪ Aesthetics/scenic resources: Alternative 1 continues the gradual transition toward a more developed landscape with an increase in paved areas, gas stations, hotels, restaurants, and retail.
Measures to reduce or eliminate impacts	None
Alternative 2: Subarea Plan Partial Implementation	
Impacts	<p>Similar to Alternative 1:</p> <ul style="list-style-type: none"> ▪ Relationship to Existing Plans/Estimated Population & Employment: Projected job growth in Alternative 2 is lower than the adopted growth targets in the Arlington Comprehensive Plan. ▪ Aesthetics/scenic resources: Alternative 2 continues the gradual transition toward a more developed landscape with an increase in paved areas, hotels, restaurants, and retail.
Measures to reduce or eliminate impacts	<p>Island Crossing-specific design standards would be applied to new development to improve its appearance and align with the rural character of the area.</p> <p>Elevation of SR 530 and careful placement of street trees will improve views of Cascade peaks and farmland and mitigate view blockage potentially caused by taller buildings.</p>
Alternative 3: Subarea Plan Full Implementation	
Impacts	<ul style="list-style-type: none"> ▪ Relationship to Existing Plans/Estimated Population & Employment: Alternative 3 would nearly meet the Comprehensive Plan's job growth targets. ▪ Aesthetics/scenic resources: With more development under Alternative 3 there is likely to be a more significant shift away from a rural aesthetic landscape than other alternatives. More numerous, taller buildings may obscure views of Cascade peaks in places.

Measures to reduce or eliminate impacts	<p>Similar to alternative 2:</p> <ul style="list-style-type: none"> ▪ Island Crossing-specific design standards would be applied to new development to improve its appearance and align with the rural character of the area. ▪ Elevation of SR 530 and careful placement of street trees will improve views of Cascade peaks and farmland and mitigate view blockage potentially caused by taller buildings.
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1.6.2 Transportation

Exhibit 1.6.2-1 Summary of Potential Transportation Adverse Impacts and Mitigation Measures to Reduce Impacts

Alternative 1: No Action	
Impacts	<ul style="list-style-type: none"> ▪ Intersections: Increases in vehicle traffic would result in intersections serving the Subarea not meeting level of service (LOS) standards including the I-5/SR 530 Interchange.
Measures to reduce or eliminate impacts	<p>Coordinate with WSDOT to on improvements to the I-5/SR 530 Interchange. Collect transportation impact fees. Implement complete streets policy.</p>
Alternative 2: Subarea Plan Partial Implementation	
Impacts	<ul style="list-style-type: none"> ▪ Intersections: Increases in vehicle traffic would result in intersections serving the Subarea not meeting level of service (LOS) standards including the I-5/SR 530 Interchange. ▪ Multimodal Access and Connectivity: Additional density results in increases in pedestrian, bike and vehicle activity and conflicts that could be potential safety issues.
Measures to reduce or eliminate impacts	<p>Consider LOS policy changes. Coordinate with WSDOT to improvements at the I-5/SR 530 Interchange Require payment of a proportional cost share towards SR 530 roadway improvements. Implement new street design standards for SR 530 that consolidates access points, constructs midblock crossings and roundabouts, and provides a shared multimodal path. Adopt transportation strategies in the IC Subarea Plan to improve safety, comfort, connectivity, and multimodal travel. Collect transportation impact fees. Implement complete streets policy.</p>
Alternative 3: Subarea Plan Full Implementation	

Impacts	<ul style="list-style-type: none"> ▪ Intersections: Increases in vehicle traffic would result in intersections serving the Subarea not meeting level of service (LOS) standards including SR 530/Smokey Point Blvd and I-5/SR 530 Interchange. ▪ Multimodal Access and Connectivity: Additional development results in increases in pedestrian, bike and vehicle activity and conflicts that could be potential safety issues.
Measures to reduce or eliminate impacts	<p>Same as Alternative 2:</p> <p>Consider LOS policy changes.</p> <p>Coordinate with WSDOT on improvements at the I-5/SR 530 Interchange</p> <p>Require payment of a proportional cost share towards SR 530 roadway improvements including SR 530/ Smokey Point Blvd intersection.</p> <p>Implement new street design standards for SR 530 that consolidates access points, constructs midblock crossings and roundabouts, and provides a shared multimodal path.</p> <p>Adopt transportation strategies in the IC Subarea Plan to improve safety, comfort, connectivity, and multimodal travel.</p> <p>Collect transportation impact fees.</p> <p>Implement complete streets policy.</p>

1.6.3 Water

Exhibit 1.6.3-1 Summary of Potential Water Adverse Impacts and Mitigation Measures to Reduce Impacts

Alternative 1: No Action	
Impacts	<ul style="list-style-type: none"> ▪ Floodplain: Increased flood depths and frequency and increased overtopping of SR 530. Increased flood-related business damage and risk to public safety. Increase in pollutant generating surfaces and flooding will decrease water quality. ▪ Surface Water: Inefficient stormwater conveyance due to a degraded SR 530 culvert. Inadequate site drainage for new development. ▪ Groundwater: Groundwater rise may impact resources in the area and the performance of existing stormwater infrastructure. ▪ Wetlands: Existing wetlands may expand due to increased flood and groundwater.
Measures to reduce or eliminate impacts	<p>On-site stormwater storage would be required for new development. Permits and compensatory mitigation would be required for any stream, wetland, or buffer impacts.</p>
Alternative 2: Subarea Plan Partial Implementation	

Impacts	<ul style="list-style-type: none"> ▪ Floodplain: Increased flood depths and frequency (less than Alternative 1). Reduced overtopping of SR 530. Increased flood-related business damage and risk to public safety (less than Alternative 1). ▪ Surface Water: Inadequate site drainage for new development. ▪ Groundwater: Groundwater rise may impact resources in the area and the performance of existing stormwater infrastructure. ▪ Wetlands: Existing wetlands may expand due to increased flood and groundwater.
Measures to reduce or eliminate impacts	On-site stormwater storage would be required for new development. Permits and compensatory mitigation would be required for any stream, wetland, or buffer impacts.
Alternative 3: Subarea Plan Full Implementation	
Impacts	<ul style="list-style-type: none"> ▪ Floodplain: Increased flood depths and frequency significantly reduced for northern parcels. SR 530 overtopping may be eliminated. Public safety risks minimized. ▪ Surface Water: None, regional floodwater facility would improve conveyance and will provide treatment for much of the subarea. ▪ Groundwater: Minor groundwater rise (less than Alternatives 1 and 2). ▪ Wetlands: The regional floodwater facility would improve wetland hydrologic functions.
Measures to reduce or eliminate impacts	<p>Permits and compensatory mitigation would be required for any stream, wetland, or buffer impacts.</p> <p>Multi-functional regional floodwater facility would help reduce flooding impacts on SR 530 and nearby properties, while also improving water quality, minimizing infrastructure damage, enhancing habitat connectivity, and supporting ecological functions.</p>

1.6.4 Natural Environment

Exhibit 1.6.4-1 Summary of Potential Natural Environment Adverse Impacts and Mitigation Measures to Reduce Impacts

Alternative 1: No Action	
Impacts	<ul style="list-style-type: none"> ▪ Habitat Loss: Potential for low-quality undeveloped terrestrial vegetation to be converted to commercial area. Development pressure less than other alternatives and therefore less likely to impact existing wetlands, streams, and riparian habitat. ▪ Indirect Habitat Impacts: Increased risk of fish stranding after flood events. No change to poorly functioning habitat connectivity due to roads and traffic levels.

Measures to reduce or eliminate impacts	Permits and compensatory mitigation would be required for any stream, wetland, or buffer impacts.
Alternative 2: Subarea Plan Partial Implementation	
Impacts	<ul style="list-style-type: none"> ▪ Habitat Loss: Potential for low-quality undeveloped terrestrial vegetation to be converted to commercial area. Wetland and riparian areas may be more vulnerable to encroachment (compared to Alternative 1). Off-site mitigation may lead to habitat loss and reduced ecological functions within the subarea. ▪ Indirect Habitat Impacts: Less risk of fish stranding after flood events (compared to Alternative 1). Increased traffic and potential new roads increases wildlife movement barriers and risk of wildlife-vehicle collisions.
Measures to reduce or eliminate impacts	<p>Permits and compensatory mitigation would be required for any stream, wetland, or buffer impacts.</p> <p>Routing high flows to riparian corridors and areas like connected ditches helps prevent fish from becoming stranded after flood events.</p>
Alternative 3: Subarea Plan Full Implementation	
Impacts	<ul style="list-style-type: none"> ▪ Habitat Loss: Potential for low-quality undeveloped terrestrial vegetation to be converted to commercial area. Regional floodwater facility maintains or improves existing habitat functions within the subarea. ▪ Indirect Habitat Impacts: Less risk of fish stranding after flood events. Increased traffic and potential new roads increases wildlife movement barriers and risk of wildlife-vehicle collisions.
Measures to reduce or eliminate impacts	<p>Permits and compensatory mitigation would be required for any stream, wetland, or buffer impacts.</p> <p>Routing high flows to riparian corridors and areas like connected ditches helps prevent fish from becoming stranded after flood events.</p> <p>Regional floodwater facility provides opportunity for compensatory mitigation to occur within the subarea.</p> <p>Regional floodwater facility could provide new opportunities to improve wildlife connectivity.</p>

1.6.5 Utilities

Exhibit 1.6.5-1 Summary of Potential Utilities Adverse Impacts and Mitigation Measures to Reduce Impacts

Alternative 1: No Action	
Impacts	<ul style="list-style-type: none"> Small increase in water and sewer demand and stormwater runoff.
Measures to reduce or eliminate impacts	<p>Utilities improvements described in utility-specific comprehensive plan (i.e., Water System Comprehensive Plan, etc.) will address general growth.</p> <p>Code requires project specific upgrades with new development when necessary to maintain service standards.</p>
Alternative 2: Subarea Plan Partial Implementation	
Impacts	<ul style="list-style-type: none"> Similar to Alternative 1, with small increases in water and sewer demand and stormwater runoff.
Measures to reduce or eliminate impacts	<p>Utilities improvements described in utility-specific comprehensive plan (i.e., Water System Comprehensive Plan, etc.) will address general growth.</p> <p>Code requires project specific upgrades with new development when necessary to maintain service standards.</p>
Alternative 3: Subarea Plan Full Implementation	
Impacts	<ul style="list-style-type: none"> Greatest increase in water and sewer demand.
Measures to reduce or eliminate impacts	<p>Utilities improvements described in utility-specific comprehensive plan (i.e., Water System Comprehensive Plan, etc.) will address general growth.</p> <p>Code requires project specific upgrades with new development when necessary to maintain service standards.</p>

1.7 Significant Adverse Impacts

Based on the full analysis presented in Chapter 3 of the Draft EIS, implementation of the alternatives would result in the following significant unavoidable adverse impacts for the following elements of the environment:

- **Land Use and urban form:** Alternatives 1 and 2 would likely not meet the 2044 job growth targets adopted in the Arlington Comprehensive Plan. Alternatives 1 and 2 are projected to produce just 292 and 375 jobs, compared to the Comprehensive Plan target of 935. **Not meeting the adopted target could be considered a significant adverse impact unless** the City is able to accommodate job growth elsewhere.
- **Transportation:** With implementation of the planned improvements in the study area and proposed mitigation measures, there would be no significant and unavoidable impacts related solely to the proposed alternatives.
- **Water:** In Alternative 1, ongoing unregulated flooding and fragmented stormwater management lead to increasing flood impacts, unsafe conditions for drivers and low-lying development and declining water quality all of which **would be significant adverse impacts**.
- **Natural Environment:** Alternatives 1 and 2 could lead to habitat loss and degradation, **which would be considered a significant adverse impact**. Uncontrolled flooding under Alternative 1 increases risk of fish stranding which **would be a significant adverse impact**. Under Alternatives 1 and 2, development near riparian areas or habitat patches may further fragment habitat, limit wildlife movement, and increase the risk of wildlife-vehicle collisions which **would be a significant adverse impact**.
- **Utilities:** None.

2 Proposal & Alternatives

2.1 Introduction

2.1.1 Proposal Overview

This document is a draft non-project environmental impact statement (EIS) that provides both qualitative and quantitative analysis of environmental impacts associated with the Island Crossing Subarea Plan proposal and its alternatives. The purpose of this EIS is to inform and assist the public and City of Arlington decision-makers in evaluating options for future growth, multimodal transportation improvements, and policy/code appropriate within the Subarea.

The Island Crossing Subarea Plan is a proactive effort to build on existing assets and shape Island Crossing's future, guiding its transformation from a convenience stop into a celebrated, safe, and well-connected gateway to the Stillaguamish Valley. The plan identifies a long-term vision and strategies for resilience to flooding, identity-strengthening and better-connected development, an SR 530 design concept that celebrates Island Crossing as a gateway and improves flooding resilience, and economic development strategies that respect its agricultural roots, natural resources, and cultural significance.

Arlington will foster Island Crossing's transformation into a celebrated gateway by focusing on four key priorities: 1) adopt zoning and design standards to ensure new development reflects community values and strengthens neighborhood identity, 2) coordinate with property owners and set funding strategy for a regional compensatory storage facility to support flood resilience, 3) coordinate with WSDOT to secure funding and implement SR 530 improvements, and 4) attract desired businesses through proactive relationship building with developers, property owners, and businesses.

2.1.2 Study Area

Island Crossing is an 87-acre area in northwest Arlington, well-connected to the region and the economic centers of Old Town and the Cascade Industrial Center, and a gateway to the Stillaguamish Valley and Snohomish County's agricultural lands. Though it has the potential to play a vital role in the region's commercial, agritourism, and outdoor recreation economies, it has been developing as a highway-oriented convenience stop.

2.2 SEPA Process

2.2.1 Environmental Review Process

Under RCW 43.21C.440 and WAC 197-11-164, the City of Arlington is designating the Island Crossing Subarea as a Planned Action area. This EIS provides a cumulative, subarea-wide environmental analysis to support adoption of a Planned Action Ordinance, which will define City and developer mitigation responsibilities. Future development that is consistent with the Planned Action Ordinance and Island Crossing Subarea Plan would not have to repeat the environmental review completed in this EIS. This provides regulatory certainty and predictability for developers and the community, supports streamlined environmental review for permitting, and aligns with the goals of SEPA and the Growth Management Act (RCW Chapter 36.70A).

The EIS process includes the following steps: (1) scoping the EIS content with input from agencies, tribes, and the public; (2) preparing a draft EIS and allowing for public comments; (3) responding to comments and establishing a preferred alternative; (4) issuing the Final EIS; and (4) adopting supporting legislation aligned with the EIS.

A Final EIS will be issued in October 2025 and will include responses to public comments received during the Draft EIS comment period. Following the EIS process, the City will consider adoption of the Subarea Plan.

2.2.2 Scope of Environmental Review

The City of Arlington held a joint community workshop and SEPA EIS scoping meeting July 9, 2025 (see Public Engagement). Following scoping, the City identified the following elements and associated environmental topics to be analyzed in the EIS:

- Land Use and Urban Form: Relationship to existing land use plans and aesthetics/scenic resources
- Transportation: Non-motorized facilities; traffic volumes, operations, and safety
- Water: Floodplain, surface water, groundwater, wetlands
- Natural Environment: Stream, riparian, wetland, and terrestrial habitats; priority species and habitats
- Utilities: Water, sewer, stormwater, electrical power, and natural gas

These elements are presented in Chapter 3 of the EIS, respectively, including an analysis of the affected environment, potential impacts, and mitigation measures.

2.3 Planning Context

2.3.1 Arlington Comprehensive Plan

The City's Comprehensive Plan was adopted in December 2024. The Comprehensive Plan identifies Island Crossing as one of fourteen subareas that “distinguish specific geographical areas and existing neighborhoods within the community.” The plan emphasizes the importance of Subarea Planning in partnership with community members. The Island Crossing Subarea Plan furthers several plan goals related to economic development and strategic targeting of growth to areas with appropriate infrastructure.

SELECTED LAND USE GOALS

- Goal LU-1 Provide unique places and context for the growth of social capital and community resiliency.
- Goal LU-3 Address cross-jurisdictional growth, social, and cultural issues by working with affected jurisdictions.
- Goal LU-6 Identify, protect, and enhance community resiliency to climate change impacts, including social, economic, and built environment factors, that support adaptation to climate impacts consistent with environmental justice.

SELECTED ECONOMIC DEVELOPMENT GOALS

- Goal ED-1 Support a range of employment options at different income levels and a variety of amenities are available throughout the city.
- Goal ED-2 Promote a strong, diversified, and sustainable local and regional economy.
- Goal ED-3 Actively cooperate with other agencies and local businesses to support economic development.
- Goal ED-6 Guide economic development practices within the city that protect and support the natural environment.
- Goal ED-7 Encourage the development of unique economic hubs at various scales throughout the city to adequately serve residents and the region.
- Goal ED-8 Support economic development activities that enhance the quality of life for Arlington residents

The City of Arlington and Snohomish County are planning for residential growth and expect no housing growth in Island Crossing. See section 2.5.2 for employment growth projections.

2.3.2 Arlington Municipal Code 20.44.032

Arlington Municipal Code (AMC) 20.44.032 – Subarea plans lays out the parameters for subarea planning for the fourteen designated subareas in Arlington. City-initiated subarea plans, such as the Island Crossing Subarea Plan, are subject to a public hearing before the hearing examiner (following the procedures of AMC 20.24), who reviews and may choose to recommend the plan to City Council for the final ordinance. Approved subarea plans are recorded with the Snohomish County auditor office and future land use permit applications must comply with the development regulations established with the plan.

2.4 Public Engagement

From May through November 2024, the City gathered stakeholders' and community members' ideas and goals for the subarea. This engagement included workshops, surveys, and advisory group meetings with business and property owners. Additionally, technical meetings with Snohomish County representatives, the Washington State Department of Transportation (WSDOT), and Community Transit informed the design considerations for SR 530. A summary table of this plan's public engagement activities is below.

Exhibit 2.3.2-1 Engagement Summary

Event	Date	Audience	What we learned
Kick-off tour and meeting	Mar. 2024	Elected officials	<ul style="list-style-type: none"> ▪ Flooding is a major issue, particularly flooding across 530. ▪ Herrera to research feasibility and impact of a side channel along the edge of the County-owned park property. ▪ Conversations with property owners between 530 and the river may be needed. ▪ Interventions are unlikely to get the entire area out of the floodplain. ▪ Access control along 530 is an issue; road improvements are needed. ▪ Potential to bring activity/assets to the highway frontage.
Visioning Open House	May 2024	Arlington community	<ul style="list-style-type: none"> ▪ Flooding impacts to properties and roads are a major concern. ▪ Diverging visions for future land uses include additional auto-oriented commercial uses, preservation of agricultural land, and promotion of agritourism. ▪ Transportation challenges include truck traffic and lack of access control to businesses. Differing opinions on SR 530 design.

Event	Date	Audience	What we learned
Community survey	May-June 2024	Arlington community	<ul style="list-style-type: none"> ▪ Desire to preserve culturally significant farmland and agricultural scenery. ▪ Desire to maintain the subarea’s current level of development to minimize impact on farmland and avoid noise, traffic, and light pollution. ▪ Appreciation for businesses that support agricultural uses and encourage agritourism. ▪ Worry that increased development could intensify flood risk and impact wildlife habitat. ▪ Using farmland for flood mitigation is viewed negatively as it reduces agricultural capacity. ▪ Concerns for traffic congestion and related safety impacts. ▪ Concerns that increased development and additional truck stops will strain infrastructure. ▪ Lack of sidewalks and crosswalks makes the area auto-oriented and uncomfortable for pedestrians and cyclists. Strong support for shared-use paths and regional bike connections.
Stakeholder interview	July 2024	Subarea property owner	<ul style="list-style-type: none"> ▪ Desire for City-owned regional compensatory storage strategy. ▪ Vision for development of properties facing SR 530 included aesthetically pleasing truck stop combined with other uses. Truck stop considered an economically feasible option. ▪ Interest in an east-west path connecting Silvana to Centennial Trail for bringing community together and supporting tourism. ▪ Interest in supporting agritourism, but unsure about its feasibility if it has to pay for floodwater storage.

Event	Date	Audience	What we learned
Advisory Groups	Aug. and Sept. 2024	Subarea property owners and other stakeholders	<ul style="list-style-type: none"> ▪ Desire for farmland and agricultural heritage preservation and to address flooding. Mixed interest in truck-stop development. ▪ Interest in street improvements to reduce speed and improve compatibility with pedestrian and bike mobility. ▪ Design roundabouts to accommodate freight and farm vehicles. ▪ Mixed views on park-and-ride/transit station, particularly feasibility. ▪ Divided views on compensatory storage: <ul style="list-style-type: none"> ○ Some interest in compensatory storage north of the subarea (and in southern tip) ○ Several interested in individual mitigation ○ Strong views on avoiding storage on farmland ▪ Strong interest in agritourism and hotel, recreation, restaurant, and retail/grocery/service follows ▪ North/northeastern area identified as ideal location for new development ▪ Identified “pin” locations generally align with land use options
Transportation Technical Group	July and Nov. 2024	Agency partners	<ul style="list-style-type: none"> ▪ Traffic congestion is a major concern. ▪ Roundabouts are preferred by WSDOT rather than signalized intersections. ▪ Consolidated driveways (as opposed to frontage roads) is the preferred option which allows for piecemeal development and easier grade transition to private properties if SR 530 is elevated. ▪ The lack of population in the subarea reduces feasibility of transit service regardless of commercial growth. Microtransit is a viable alternative. ▪ Concerns with landscape maintenance.
Scoping Community Meeting	July 2025	Arlington community	<ul style="list-style-type: none"> ▪ Relationship to Existing Land Use Plans, Transportation, and Utilities (sewer, water, stormwater, and street lighting), were considered the most important topic. ▪ Request for additional study of proposed floodable park/compensatory storage site. Consider other alternatives (Pape’s compensatory mitigation site). ▪ Consider economic viability of truck stops, ▪ Request for additional hydraulic analysis to promote balanced development while protecting floodplain habitat ▪ Continue coordination with the Tribe for the Smokey Point roundabout and future development. ▪ Strong interest in recreational facilities such as trails with views, and an event/community center

2.5 Objectives and Alternatives

2.5.1 Proposal Objectives

SEPA requires the statement of objectives describing the purpose and need for the proposals. The following objectives apply to the alternatives considered in this EIS:

1. Bring property and business owners, nearby residents, and other interested parties together to shape a shared vision for the future of Island Crossing compatible with the Arlington Comprehensive Plan.
2. Evaluate environmental hazards, infrastructure needs, and growth potential and align future infrastructure investment plans with the shared vision.
3. Develop recommendations for new land use and zoning standards, design standards, and adjustments to other city regulations for City Council consideration.

2.5.2 Description of Alternatives

Alternative 1: No Action

Alternative 1: No Action assumes no change to current regulations and that City commitments, policies, and capital improvement plans would continue as planned over the next 20 years. The Highway Commercial zoning and Mixed Use and Flood District overlays would remain in place, allowing a broad range of commercial uses and no residential development.

Under No Action Island Crossing is expected to add about 97 new jobs and no new residences.

Exhibit 2.5-1. Alternative 1: No Action – Jobs Capacity

Existing (2025)	Net New Jobs	Total Jobs
215	183	292

Existing jobs source: 2019 Snohomish County Buildable Lands Report with modifications to account for recent development.

TRANSPORTATION

The No Action alternative would implement projects currently in the Transportation Improvement Plan (TIP):

- Multimodal improvements along Smokey Point Blvd between 200th St and SR 530 (add sidewalks and bicycle accommodations and widen to three lanes)
- A roundabout at SR 530/Smokey Point Blvd (currently being designed by City)
- Improvements at the I-5/SR 530 interchange, including potential roundabouts on each side of I-5

WATER

No major actions.

NATURAL ENVIRONMENT

No major actions.

UTILITIES

The No Action alternative would implement two water service improvements identified in the Comprehensive Plan for Island Crossing:

- 12” Water Main 204th Street NE
- Local improvement district (LID) to coordinate developer-funded installation of a 12-inch ductile iron water main along the western boundary of the subarea.

The No Action alternative includes planned construction of Lift Station 11 and Lift Station 14 submersible pump stations to provide adequate sewer capacity to accommodate growth.

Alternative 2: Subarea Plan Partial Implementation

Alternative 2: Subarea Plan Partial Implementation would implement the land use and urban design, transportation, and public services and utilities actions of the Arlington Island Crossing Subarea Plan, but not the regional flooding/compensatory storage facility actions.

The combination of more generous height limits near I-4 and investments in SR-530 reconstruction is expected to modestly increase development relative to Alternative 1. Under Alternative 2 Island Crossing is expected to add about 97 new jobs and no new residences.

Exhibit 2.5-2. Alternative 2 – Jobs Capacity

Existing (2025)	Net New Jobs	Total Jobs
215	160	375

Existing jobs source: 2019 Snohomish County Buildable Lands Report with modifications to account for recent development.

LAND USE AND URBAN FORM

DEVELOPMENT REGULATIONS

Alternative 2 would implement new zoning and design standards for Island Crossing to encourage the growth of retail businesses and agritourism in clusters at key locations. The standards seek to promote a development pattern with buildings that are closer together and easier to access from adjacent sites. Design standards would encourage visual connections to the surrounding agricultural landscape and attempt to mitigate accessibility impacts from roadways and building pads that have been elevated as a flood mitigation measure.

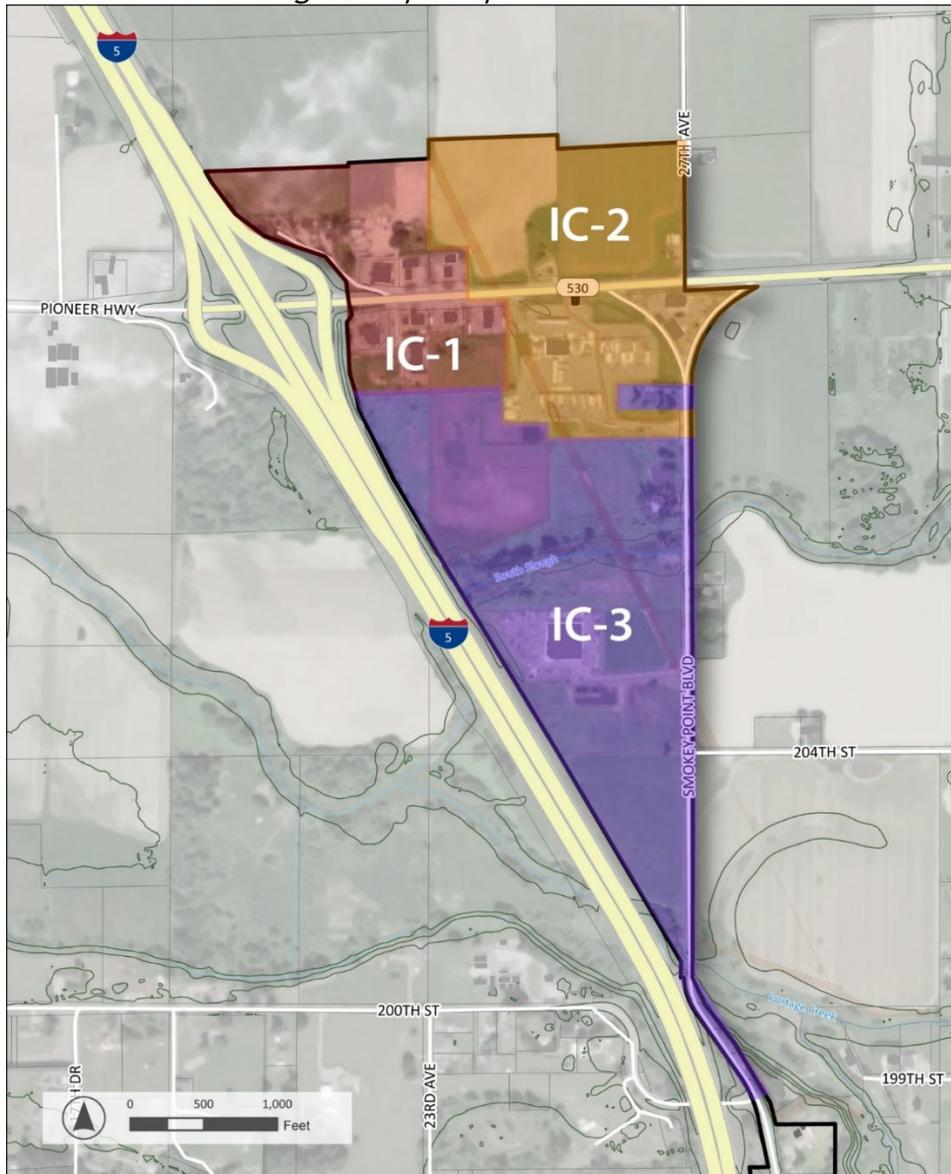
Exhibit 2.5-3. Alternative 2 Zoning Concepts

	IC-1	IC-2	IC-3
Intent	Accommodate highway-oriented commercial activities along I-5 to cater to commuters, tourists, and commerce.	Promote low- to medium-intensity commercial activities, including agri-commercial use. This area also allows for public/semi-public uses in partnership with the City.	Accommodate general commercial such as car and heavy equipment sales.
Generalized Allowed Uses	Permitted uses include retail, restaurant, hotels, and some public and semi-public facilities except for hospitals and schools. Vehicle services like car washes are allowed, but gas stations are not. Residential uses and offices are not permitted.	Uses allowed here include those allowed in IC-1, except for hotels or similar overnight accommodations. Vehicle services and fuel sales are not permitted.	Uses allowed here include those allowed in IC-1, except for hotels or similar overnight accommodations and beverage-related businesses such as breweries. IC-3 also permits heavy equipment sales and car dealerships. Vehicle services like car washes are allowed, but gas stations are not.
Height	50 feet Hotels only – 100 feet	50 feet	50 feet
Setbacks and Parking Orientation	Encourages buildings to locate close to SR 530 when possible and orient toward side streets and new connections	Encourages buildings to locate close to SR 530 when possible and orient toward side streets and new connections	Flexibility for buildings to locate further from the right-of-way

Parking	No changes to parking standards: see AMC 20.72 Parking		
Design Standards	Comply with Island Crossing Subarea Development Standards (to be adopted with Subarea Plan)	Comply with Island Crossing Subarea Development Standards (to be adopted with Subarea Plan)	Comply with Citywide Development Standards
Intent	Accommodate highway-oriented commercial activities along I-5 to cater to commuters, tourists, and commerce.	Promote low- to medium-intensity commercial activities, including agri-commercial use. This area also allows for public/semi-public uses in partnership with the City.	Accommodate general commercial such as car and heavy equipment sales.
Height	50 feet Hotels only – 100 feet	50 feet	50 feet

Source: 2019 Snohomish County Buildable Lands Report with modifications to account for recent development.

Exhibit 2.5-4. Zoning Concept Map



Source: MAKERS, 2024

URBAN/RURAL GATEWAY

Alternative 2 would implement Island Crossing Subarea Plan actions to encourage an aesthetic experience for people travelling through Island Crossing that is inviting and links the area with surrounding river valley and mountain landscapes. These actions include an improved SR 530 streetscape with public art, wayfinding, and signage, and updated development regulations and design standards to better integrate buildings and streets with the surrounding environment.

TRANSPORTATION

SR 530 RECONSTRUCTION

The City will coordinate with WSDOT to design and construct SR 530 and related road improvements to support all road users, including non-motorized users as well as trucks, farm equipment, and buses, and provide landscaping and gateway features. This project would also include a single-lane roundabout midway between I-5 and Smokey Point Blvd.

WATER

Alternative 2 would include two important water-related actions related to SR 530 reconstruction:

- Elevating the roadway to accommodate future climate change-influenced flood events by setting the base flood elevation higher than current FEMA recommendations.
- Expanding the culvert under SR 530 to eliminate SR 530 overtopping and better utilize flood storage areas south of SR 530.

NATURAL ENVIRONMENT

No major actions.

UTILITIES

Same as Alternative 1.

Alternative 3: Subarea Plan Full Implementation

Alternative 3: Subarea Plan Full Implementation would include all other actions in Alternative 2, as well as investment in floodwater compensatory storage infrastructure to address vulnerability to Stillaguamish River flooding and increase development capacity in the subarea. The creation of the regional compensatory flood facility is expected to significantly increase development feasibility, resulting in the creation of more jobs than Alternative 2.

Exhibit 2.5-5. Alternative 3 – Jobs Capacity

Existing (2025)	Net New Jobs	Total Jobs
215	610	825

Existing jobs source: 2019 Snohomish County Buildable Lands Report with modifications to account for recent development.

LAND USE AND URBAN FORM

DEVELOPMENT REGULATIONS

Alternative 2 would implement new zoning and design standards for Island Crossing to encourage the growth of retail businesses and agritourism in clusters at key locations. The standards seek to promote a development pattern with buildings that are closer together and easier to access from adjacent sites. Design standards would encourage visual connections to the surrounding agricultural landscape and attempt to mitigate accessibility impacts from roadways and building pads that have been elevated as a flood mitigation measure.

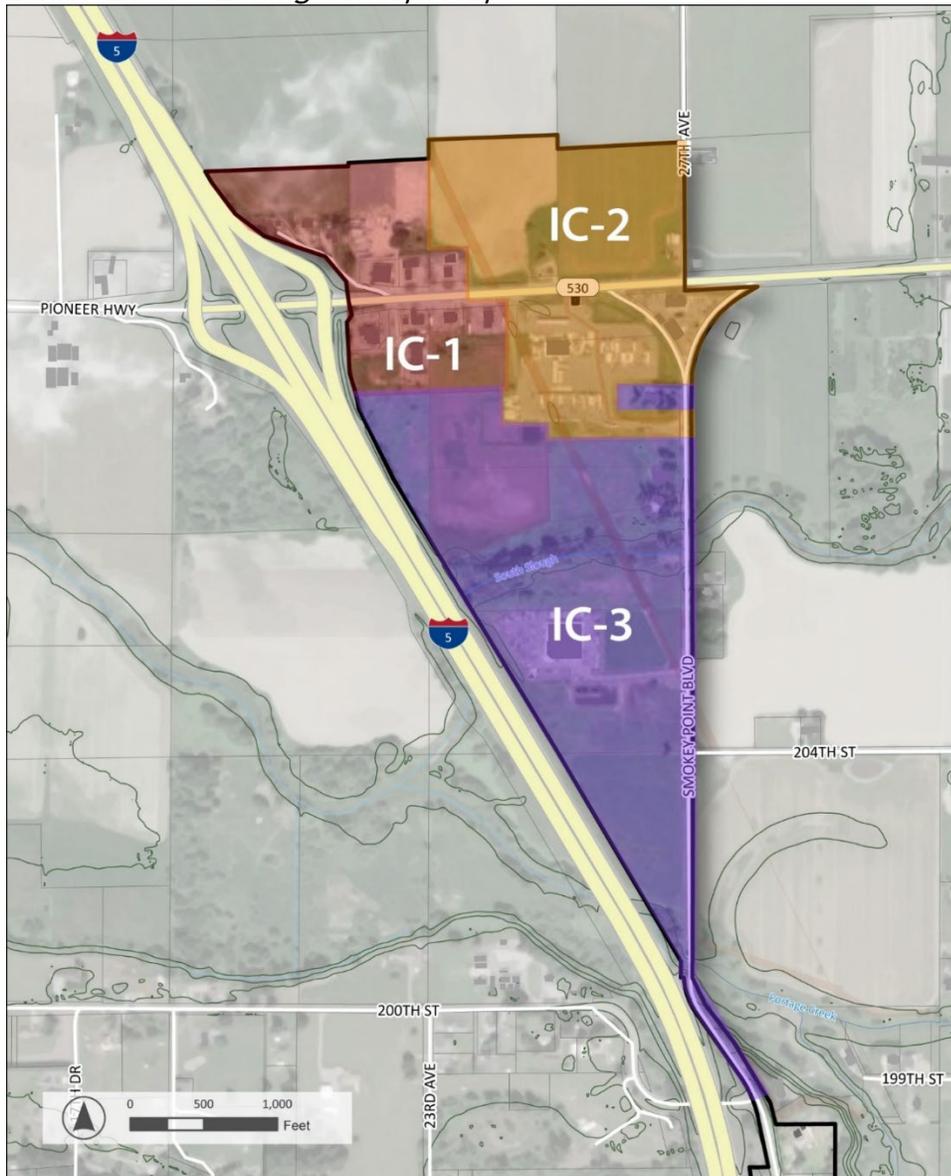
Exhibit 2.5-6. Alternative 3 Zoning Concepts

	IC-1	IC-2	IC-3
Intent	Accommodate highway-oriented commercial activities along I-5 to cater to commuters, tourists, and commerce.	Promote low- to medium-intensity commercial activities, including agri-commercial use. This area also allows for public/semi-public uses in partnership with the City.	Accommodate general commercial such as car and heavy equipment sales.
Generalized Allowed Uses	Permitted uses include retail, restaurant, hotels, and some public and semi public facilities except for hospitals and schools. Vehicle services like car washes are allowed, but gas stations are not. Residential uses and offices are not permitted.	Uses allowed here include those allowed in IC-1, except for hotels or similar overnight accommodations. Vehicle services and fuel sales are prohibited.	Uses allowed here include those allowed in IC-1, except for hotels or similar overnight accommodations and beverage-related businesses such as breweries. IC-3 also permits heavy equipment sales and car dealerships. Vehicle services like car washes are allowed, but gas stations are not.
Height	50 feet Hotels only – 100 feet	50 feet	50 feet
Setbacks and Parking Orientation	Encourages buildings to locate close to SR 530 when possible and orient toward	Encourages buildings to locate close to SR 530 when possible and orient toward	Flexibility for buildings to locate

	side streets and new connections	side streets and new connections	further from the right-of-way
Parking	No changes to parking standards: see AMC 20.72 Parking		
Design Standards	Comply with Island Crossing Subarea Development Standards (to be adopted with Subarea Plan)	Comply with Island Crossing Subarea Development Standards (to be adopted with Subarea Plan)	Comply with Citywide Development Standards
Intent	Accommodate highway-oriented commercial activities along I-5 to cater to commuters, tourists, and commerce.	Promote low- to medium-intensity commercial activities, including agri-commercial use. This area also allows for public/semi-public uses in partnership with the City.	Accommodate general commercial such as car and heavy equipment sales.
Height	50 feet Hotels only – 100 feet	50 feet	50 feet

Source: 2019 Snohomish County Buildable Lands Report with modifications to account for recent development.

Exhibit 2.5-7. Zoning Concept Map



Source: MAKERS, 2024

URBAN/RURAL GATEWAY

Alternative 2 would implement Island Crossing Subarea Plan actions to encourage an aesthetic experience for people travelling through Island Crossing that is inviting and links the area with surrounding river valley and mountain landscapes. These actions include an improved SR 530 streetscape with public art, wayfinding, and signage, and updated development regulations and design standards to better integrate buildings and streets with the surrounding environment.

TRANSPORTATION

SR 530 RECONSTRUCTION

Like Alternative 2, the City will coordinate with WSDOT to design and construct SR 530 and related road improvements to support all road users, including non-motorized users as well as trucks, farm equipment, and buses, and provide landscaping and gateway features. This project would also include a single-lane roundabout midway between I-5 and Smokey Point Blvd.

WATER

Collaborate with property owners to design, fund, and build a regional compensatory flood facility north of SR 530. This facility will compensate for impacts from new development that would otherwise increase flood exposure for nearby properties. The facility would be co-located with a regional park and sports fields.

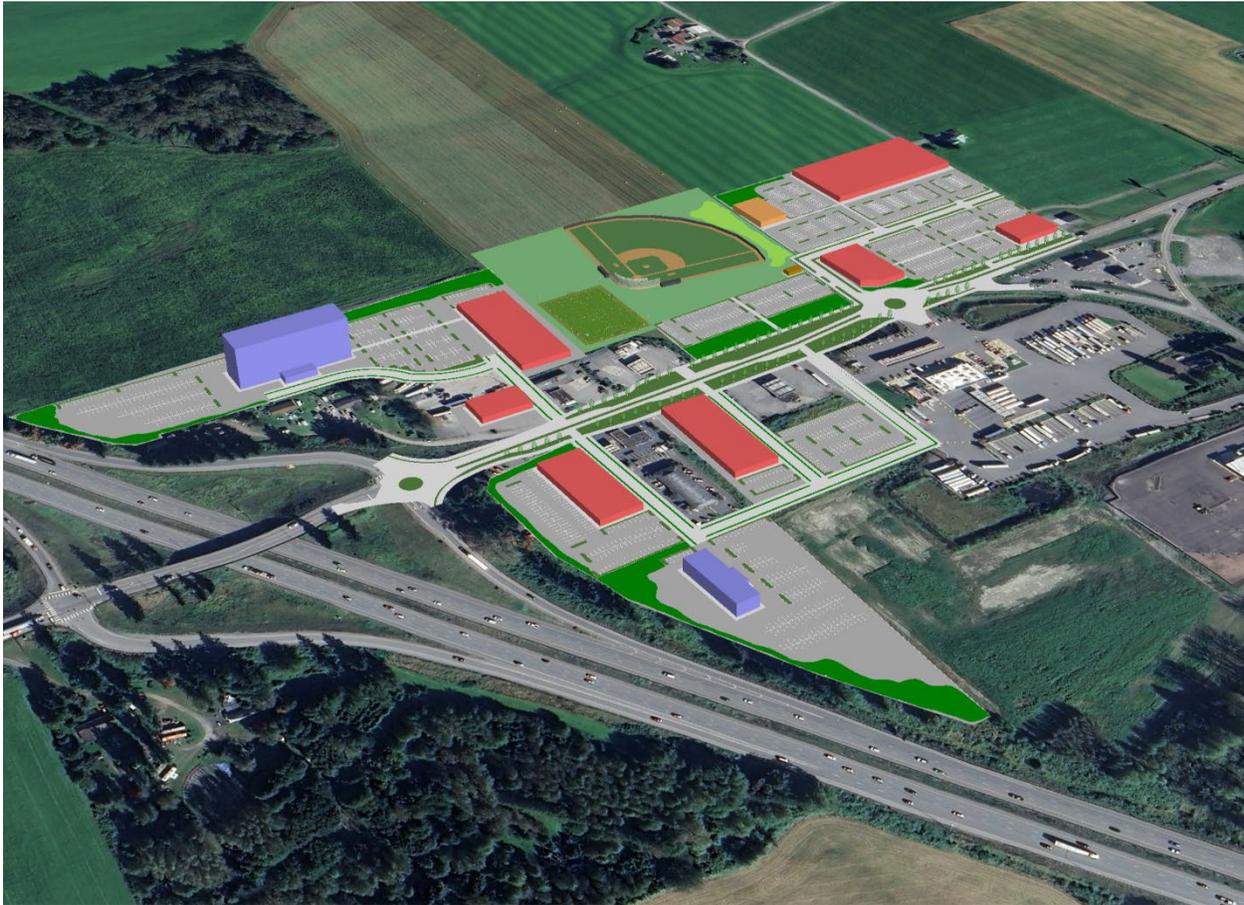
NATURAL ENVIRONMENT

No major actions.

UTILITIES

Alternative 3 includes development of an Island Crossing Stormwater Plan to address stormwater management in the area.

Exhibit 2.5-8. Alternative 3 Conceptual Site plan



Source: MAKERS

Note: This is a conceptual rendering – actual location, size, and type of buildings will differ.

3 Environment, Impacts & Mitigation

This chapter describes the affected environment, potential impacts, and mitigation measures for the following topics:

- Section 3.1 Land Use & Urban Form
- Section 3.2 Transportation
- Section 3.3 Water
- Section 3.4 Natural Environment
- Section 3.5 Utilities

After reviewing the affected environment, this analysis compares alternatives and offers mitigation measures for identified impacts. It also summarizes whether any significant adverse impacts are unavoidable.

3.1 Land Use & Urban Form

3.1.1 Affected Environment

Relationship to Existing Plans

This section provides a summary of State, Region, County, and City plans and policies relevant to the Island Crossing Planned Action.

COMPREHENSIVE PLAN

In 2024 the City of Arlington adopted a new Comprehensive Plan. There were no changes to land use designations or zoning in Island Crossing relative to the previous version of the plan. Zoning and land use designations are summarized in the Zoning and Future Land Use Designation section below.

SELECTED LAND USE GOALS AND POLICIES

- **Goal LU-1 Provide unique places and context for the growth of social capital and community resiliency.**
 - LU-1.1 Ensure both publicly- and privately-owned civic spaces are included throughout the City to provide adequate gathering spaces.
 - LU-1.2 Establish development standards and regulations based on the availability and serviceability of developable lands to maintain a balanced mix and arrangement of land uses in the City.

- LU-1.4 Encourage development patterns that provide safe and welcoming environments for walking and bicycling.
- **Goal LU-2 Ensure equitable access to City resources and programs through proactive and transparent outreach efforts, completed on multiple platforms, and where appropriate, in multiple languages.**
 - LU-2.1 Regularly review existing development regulations to remove requirements that unnecessarily hinder the development process.
 - LU-2.3 Employ outreach efforts to gain input from residents and business owners on public improvements and land use actions that have the potential to affect the identity of existing neighborhoods.
 - LU-2.4 Review city projects to mitigate displacement risk and minimize impacts to private property owners, including consideration of projects that may necessitate property condemnation, right-of-way acquisition, and/or eminent domain.
- **Goal LU-3 Address cross-jurisdictional growth, social, and cultural issues by working with affected jurisdictions.**
 - LU-3.5 Recognize and work with contiguous systems that cross jurisdictional boundaries, including natural systems, land use patterns, and transportation and infrastructure systems, in community planning, development, and design.
- **Goal LU-4 Encourage local businesses through the continued application of mixed-use residential corridors and multiple locations for neighborhood serving businesses.**
 - LU-4.2 Promote the development of new retail, service, and civic mixed-uses and promote the enhancement of existing spaces to create urban centers.
 - LU-4.3 Support the transformation of key underutilized lands, such as surplus public lands or environmentally contaminated lands, to higher density, mixed-use areas to enhance and complement the development of neighborhood centers.
 - LU-4.5 Tailor concurrency programs for urban centers and other subareas to encourage development that can be supported by transit.
 - LU-4.6 Encourage developments that place employment areas and living areas in close proximity in order to maximize transportation choices, minimize vehicle miles traveled, optimize the use of existing and planned transportation systems and capital facilities, and improve the jobs-housing balance.
 - LU-4.7 Encourage coordination among the City, transportation providers, and developers to ensure that joint- and mixed-use developments are designed to promote and improve physical, mental, and social health, and reduce the impacts of climate change on the natural and built environments.

- **Goal LU-6 Identify, protect, and enhance community resiliency to climate change impacts, including social, economic, and built environment factors, that support adaptation to climate impacts consistent with environmental justice.**
 - LU-6.2 Ensure land development patterns minimize or prevent impacts on natural open spaces and resource lands.
 - LU-6.3 Development patterns shall be responsive to critical areas and other environmental factors, while minimizing the fragmentation of the built environment.
 - LU-6.5 Establish best management practices that protect the long-term integrity of the natural environment and adjacent land uses.
 - LU-6.6 Encourage the protection of the quality and quantity of groundwater used for public water supplies.
- **Goal LU-7 Promote energy conservation by developing incentives and/or requirements for energy-saving transportation, land development patterns and practices, and building construction and operation methods and materials.**
 - LU-7.3 Use innovative development standards, design guidelines, regulatory incentives, and applicable low-impact development measures to provide compact, high-quality communities

SELECTED ECONOMIC DEVELOPMENT GOALS AND POLICIES

- **Goal ED-1 Support a range of employment options at different income levels and a variety of amenities are available throughout the city.**
 - ED-1.1 Encourage a diversified and vibrant economy in order to facilitate high and stable rates of employment within the city, available at a range of income levels.
 - ED-1.2 Establish and support economic development activities that help to attract, retain, expand, and diversify businesses throughout the city, particularly those that provide living-wage jobs.
 - ED-1.3 Promote diverse and sustainable employment sectors to support and encourage residents to live and work in Arlington.
 - ED-1.4 Foster an equitable business and regulatory environment that supports the establishment and growth of startups, small businesses, locally owned, and women- and minority-owned businesses.
- **Goal ED-2 Promote a strong, diversified, and sustainable local and regional economy.**
 - ED-2.1 Plan for adequate land capacity to support commercial and industrial uses and to provide sufficient employment meeting the 20-year employment targets for Arlington.

- ED-2.2 Plan for adequate retail sales base (i.e., commercial land base) to provide financial support for the services the City provides.
- ED-2.5 Leverage Arlington’s visibility from Interstate-5 and encourage the development and enhancement of the city’s gateways to attract additional consumer base.
- ED-2.9 Identify sectors of the economy within Arlington where opportunities might exist to create additional jobs and identify potential strategies for attracting employment in those fields.
- **Goal ED-3 Actively cooperate with other agencies and local businesses to support economic development.**
 - ED-3.4 Participate or otherwise assist in business sponsored activities to increase local awareness of goods and services available in Arlington.
 - ED-3.7 Coordinate with Snohomish County on potential tourism grants to support citywide and regional tourism efforts.
- **Goal ED-6 Guide economic development practices within the city that protect and support the natural environment.**
 - ED-6.2 Encourage economic development activities that take into consideration the capacities of the area’s natural resources, public services, and facilities.
- **Goal ED-7 Encourage the development of unique economic hubs at various scales throughout the city to adequately serve residents and the region.**
 - ED-7.1 Promote the viability of Old-Town Business District, Smokey Point Boulevard, the Cascade Industrial Center, and Island Crossing as regional economic draws, while maintaining and improving upon smaller neighborhood hubs to serve local residents.
 - ED-7.7 Develop economic development strategies to differentiate and enhance the different subareas of the city.
- **Goal ED-8 Support economic development activities that enhance the quality of life for Arlington residents**
 - ED-8.2 Encourage businesses that process and sell locally produced resources, particularly healthy food products.
 - ED-8.3 Develop a variety of strategies aimed at enhancing the diversity of Arlington’s tourism base, with particular focus on agritourism, farm-to-table, and local crafts industry products.

ZONING AND FUTURE LAND USE DESIGNATION

The Island Crossing subarea is zoned Highway Commercial, allowing a broad range of commercial activities. Island Crossing also has a Mixed Use Overlay, which in other parts of the city allows a mix of commercial and residential high density uses in order to create a pedestrian-friendly, mixed use zone near employment opportunities. However, in Island Crossing the mixed-use overlay prohibits residential development.

Exhibit 3.1.1-1 HC Density and Dimension Standards

Zone			Highway Commercial
Minimum Lot Size (square feet)			0
Minimum Residential Density			N/A
Minimum Lot Width (feet)			70
Building Setback Requirements – Minimum Distance, in feet from:	Non-Arterial Street Right of Way Line	Building	25 if building > 10,000 sf 10 if building < 10,000 sf
		Freestanding Sign	10
	Arterial Street Right of Way Line	Building	25 if building > 10,000 sf 10 if building < 10,000 sf
		Freestanding Sign	5
	Rear Lot Boundary Line	Building	Primary – 20 Accessory – 5
	Side Lot Boundary Line or Alley	Building and Freestanding Sign	5
ECA Buffer	15		
Height Limit (feet)			50 (Hotels 100)
Max. Lot Coverage (%)			100

Source: City of Arlington

AIRPORT PROTECTION SUBDISTRICT

The majority of Island Crossing lies within the Airport Protection Subdistrict D, which restricts uses that would interfere with airport and flight operations, limits building/structure heights to 166 feet, and does not limit residential or employment intensities. The southeast corner of the subarea falls within the Airport Protection Subdistrict C, which, in addition to the restricted uses of Subdistrict D, restricts uses that would increase bird populations.

PUGET SOUND REGIONAL COUNCIL VISION 2050 (2020)

In 2020, the Puget Sound Regional Council (PSRC) adopted VISION 2050, a regional plan for coordinated transportation and land use planning.

Metropolitan Planning Policies (MPPs) are required under the Growth Management Act to guide the planning of King, Pierce, and Snohomish Counties. A series of goals and policies identify the need for healthy, equitable and vibrant communities with compact housing and walkable neighborhoods, active and connected transportation, healthy environments, rural and natural area conservation, and access to parks and open space. Selected goals and policies are listed below.

Regional Growth Strategy Goal: The region accommodates growth in urban areas, focused in designated centers and near transit stations, to create healthy, equitable, vibrant communities well-served by infrastructure and services. Rural and resource lands continue to be vital parts of the region that retain important cultural, economic, and rural lifestyle opportunities over the long term.

MPP-RGS-4 Accommodate the region's growth first and foremost in the urban growth area. Ensure that development in rural areas is consistent with the regional vision and the goals of the Regional Open Space Conservation Plan.

MPP-RGS-6 Encourage efficient use of urban land by optimizing the development potential of existing urban lands and increasing density in the urban growth area in locations consistent with the Regional Growth Strategy.

Development Patterns Goal: The region creates healthy, walkable, compact, and equitable transit-oriented communities that maintain unique character and local culture, while conserving rural areas and creating and preserving open space and natural areas.

MPP-DP-1 Develop high-quality, compact urban communities throughout the region's urban growth area that impart a sense of place, preserve local character, provide for mixed uses and choices in housing types, and encourage walking, bicycling, and transit use.

MPP-DP-6 Preserve significant regional historic, visual, and cultural resources, including public views, landmarks, archaeological sites, historic and cultural landscapes, and areas of special character.

Economy Goal: The region has a prospering and sustainable regional economy by supporting businesses and job creation, investing in all people and their health, sustaining environmental quality, and creating great central places, diverse communities, and high quality of life.

SNOHOMISH COUNTY COUNTYWIDE PLANNING POLICIES

Development Patterns Goal: The cities, towns, and Snohomish County will provide livable communities for all residents by directing growth into designated urban areas to create urban places that are equitable, walkable, compact, and transit oriented, preserve and create open space, and protect rural and resource lands.

URBAN GROWTH AREAS AND LAND USE

DP-5 The County and cities shall adopt comprehensive plans and development regulations (RCW 36.70A.040). In Urban Growth Areas (UGAs), such plans and regulations shall:

- a. Achieve urban uses and densities;
- b. Provide for urban governmental services and capital facilities sufficient to accommodate the broad range of needs and uses that will accompany the projected urban growth; and
- c. Permit the urban growth that is projected to occur in the succeeding twenty-year period (RCW 36.70A.110(2)).

DP-15 The County and cities should adopt policies, development regulations, and design guidelines that allow for infill and redevelopment of underutilized lands and other appropriate areas.

DP-16 Jurisdictions should encourage the use of innovative development standards, design guidelines, regulatory incentives, and applicable low impact development measures to provide compact, high quality communities

COMMUNITY DESIGN

DP-33 Jurisdictions should minimize the adverse impacts on resource lands and critical areas from new developments through the use of environmentally sensitive development and land use practices

- DP-36** Jurisdictions should develop high quality, compact urban communities that impart a sense of place, preserve local character, provide for mixed uses and choices in housing types, and encourage walking, bicycling, and transit use
- DP-41** The County and cities should adopt policies that create opportunities for: a. Supporting urban food production practices, distribution, and marketing such as community gardens and farmers markets; and b. Increasing the local agricultural economy's capacity to produce, market, and distribute fresh and minimally processed foods.

ECONOMIC DEVELOPMENT

Economic Development Goal: Cities, towns, and Snohomish County government will encourage coordinated, sustainable economic growth by building on the strengths of the county's economic base and diversifying it through strategic investments in infrastructure, education and training, and sound management of land and natural resources

- ED-5** Jurisdictions should promote economic and employment growth that creates a countywide economy that consists of a diverse range of living wage jobs for all of the county's residents.
- ED-15** Jurisdictions should ensure that economic development sustains and respects the county's natural environment and encourages the development of existing and emerging industries, technologies, and services that promote environmental sustainability, especially those addressing climate change and resilience

2019 SHORELINE MASTER PROGRAM AND RELATED DOCUMENTS

Arlington's Shoreline Master Program (SMP) and supporting documents were updated in 2019. Shoreline Master Programs include comprehensive shoreline plans, mutually adopted by local governments and the Washington State Department of Ecology that regulate shoreline use and development in areas subject to regulation under the State Shoreline Management Act. Under the provisions of the Act, local governments must base SMP provisions on an analysis of the most relevant and accurate scientific and technical information. This includes meeting the mandate of "no net loss" of shoreline ecological functions, as well as providing mechanisms for restoration of impaired shoreline functions. The original SMP for the City of Arlington (City) was approved in 1974 and was updated in 2019. All SMP documents are located here: [Arlington Shoreline Master Program Documents](#).

2019 AMENDMENT TO THE COMPREHENSIVE WATER PLAN

The City's Water System Plan (WSP) fulfills state law (WAC 246-290-100) by detailing how the City will safely and efficiently operate its water system for the next 10 years. In 2019, the City amended the 2017 amended version of the 2015 WSP for consistency with other City and Snohomish County planning documents, and the City was supported by RH2 and FCS Group consultants in this work. The 2019 amendments were completed for consistency with state regulations when changes are made to the City's Water Service Area (WSA) boundary after the City acquired 17.89 acres of the City of Marysville's WSA in Smokey Point in order to meet a developer's service requirements. The WSP is provided here in multiple documents: [2019 Amended Water System Plan](#) (one volume for the plan, one volume for maps, and appendices).

2018 COMPLETE STREETS POLICY AND PROGRAM

Arlington's Complete Streets Program aims to address the needs of all users when development and redevelopment of traffic corridors are proposed within the City of Arlington, including people who drive, family and commuter cyclists, pedestrians, people with accessibility needs, and people who use transit. It also focuses on the aesthetics of our streets. More information is available here, including the City's Adopted Complete Streets Policy document: <https://www.arlingtonwa.gov/574/Complete-Streets>.

2017 AMENDMENT TO THE COMPREHENSIVE WASTEWATER PLAN

The City of Arlington adopted the 2017 amendments to the 2015 Comprehensive Wastewater Plan (CWP), and the City was supported by RH2 and FCS Group consultants in this work. The CWP fulfills state law (WAC 173-240-050) by detailing how the City will safely and efficiently operate our sanitary sewer and wastewater treatment systems for the next 10 to 20 years. The amendment is necessary to assure consistency with a concurrent amendment to the City's overall Comprehensive Plan update, which defines how the City is planning to grow. The 2017 plan is available here: [2017 Amended Comprehensive Wastewater Plan](#). The City conducts capital improvements planning on a biennial basis and recently updated wastewater system and facility needs for the CIP, as noted in the Capital Facilities Book of the Comprehensive Plan. The City will be updating its overall Comprehensive Wastewater Plan as an outcome of the comprehensive planning process to ensure alignment with planned growth through 2044.

2014 ARLINGTON RIVERFRONT MASTER PLAN

Through the creation and adoption of the 2014 Arlington Riverfront Master Plan, the City Council recognized the special role the Stillaguamish River plays in the Arlington. The river

provides many quality of life benefits for Arlington residents and visitors to the city including recreation, employment, tourism, and habitat preservation. The plan provides a pro-active vision for the riverfront area north of downtown Arlington. Although the plan addresses a different section of the Stillaguamish River, it provides context for the City's approach to the river in other areas, including Island Crossing. The Riverfront Master Plan and supporting documentation is available here: [Arlington Riverfront Master Plan](#).

2005 STILLAGUAMISH WATERSHED CHINOOK SALMON RECOVERY PLAN

The Stillaguamish Chinook Salmon Recovery Plan is intended to provide guidance to local stakeholders in a collaborative effort to restore and protect Chinook salmon populations in the Stillaguamish River watershed – Water Resource Inventory Area (WRIA) 5. The plan identifies lower Stillaguamish River floodplain, including Island Crossing, as a priority for floodplain restoration.

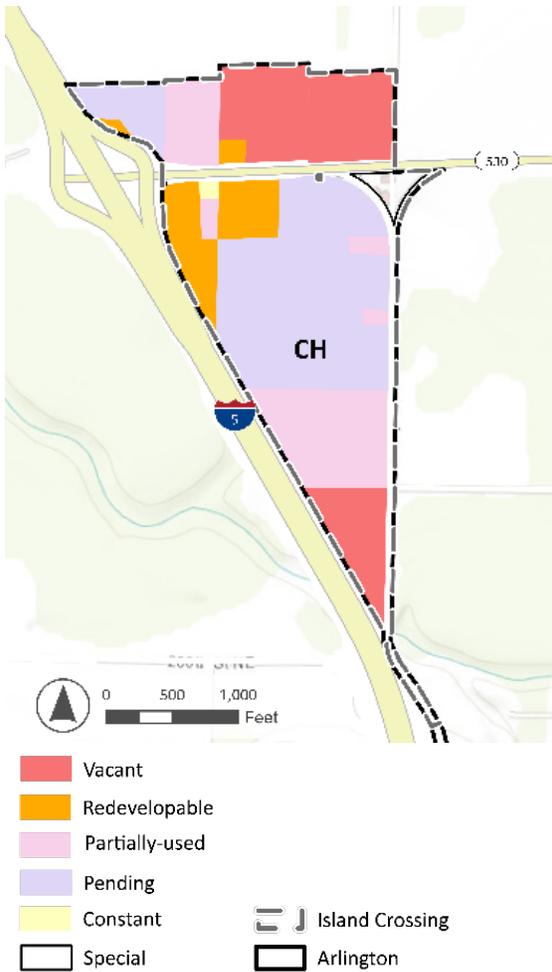
Employment Capacity

BUILDABLE LANDS REPORT

The Snohomish County Buildable Lands Report (BLR) was used by Arlington and Snohomish County to set baseline assumptions for future growth based on current conditions. The BLR shows total employment doubling by 2035, from approximately 201 jobs in 2024 to 397 by 2035 (Snohomish County Buildable Lands Report, 2021).

Growth targets developed for the Arlington Comprehensive Plan document how the City's growth strategy is expected to play out in different areas, including an elevated role for designated subareas like Island Crossing in attracting jobs and (in other subareas) housing growth. The Comprehensive Plan projected significant increase in jobs to 935 and a slight reduction in the number of housing units in Island Crossing by 2044.

Exhibit 3.1.1-2 Buildable Lands Map



Source: Snohomish County, MAKERS, 2024

Exhibit 3.1.1-3 Comprehensive Plan Development Assumptions



Source: City of Arlington, 2024

Exhibit 3.1.1-4 Buildable Lands Report and Comprehensive Plan Growth Projections

Existing Housing Units	Housing Unit Capacity	Total Housing Potential	Existing Jobs	Net New Jobs	Total Job Potential
5 (2019)	2	7	201 (2019)	196	397
5 (2020)	0	2	249 (2020)	686	935

Source: Snohomish County, 2019; City of Arlington, 2020

COMPREHENSIVE PLAN

Exhibit 3.1.1-5 2044 Comprehensive Plan Jobs Targets

	Existing (2025)	Net New Jobs	Total Jobs
2044 Comprehensive Plan	215	720	935

Source: City of Arlington, 2024

Aesthetics/Scenic Resources

Island Crossing is located immediately east of the I-5/SR 530 interchange, which provides the most direct access to downtown Arlington from I-5. From the interchange to downtown SR 530 passes through farmland and by the Stillaguamish River and forestlands to the north, with views to the east of Whitehorse Mountain, Three Fingers Mountain, and Mount Pilchuck in the Cascade Range. As a result, Island Crossing plays a unique role as the gateway into this scenic landscape.

Exhibit 3.1.1-6. Typical eastward view from the I-5/SR 530 Interchange.



Numbered peaks are #1 Whitehorse Mountain, #2 Mt Bullon, #3 Three Fingers Mountain. Mt. Pilchuck out of frame to the right.
Source: MAKERS, 2024

Within Island crossing many parcels are dedicated to agricultural uses, with broad open views, tree lines and hedgerows between fields, and small agricultural buildings. A small number of houses, some associated with farms, built many decades ago are present in the subarea. The agricultural fields vary in appearance significantly depending on the season, with lush green plantings, mature golden crops, or bare stubble, depending on the time of year or type of production pursued by the farmer. This type of rural or pastoral landscape,

with a mix of open vistas and groves of trees, has been shown to produce positive feelings in people across cultures.¹

Exhibit 3.1.1-7. Eastward view from the subarea featuring Three Fingers Mountain (center-right).



Photo courtesy of Deborah Nelson

Within Island Crossing the immediate scenery is typical of low-density commercial development near freeway interchanges, with one-story commercial buildings surrounded by paved surface parking areas. There are few trees and small landscaped islands along the roadway. Utility poles and lines are the primary vertical feature visible. In the eastern half of the subarea, farmland is visible to the north of SR 530 and to the east of Smokey Point Blvd.

¹ See literature review in: [Bennett, K. \(2019\). The Savanna Hypothesis and Landscape Preferences](#). In: Shackelford, T., Weekes-Shackelford, V. (eds) Encyclopedia of Evolutionary Psychological Science. Springer, Cham. https://doi.org/10.1007/978-3-319-16999-6_3726-1

Exhibit 3.1.1-8 Eastbound traffic on SR 530 near the entrance to Pilot Travel Center.



Source: MAKERS, 2024

3.1.2 Potential Impacts

Thresholds of Significance

Thresholds of significance are here used to define impacts that would have adverse effects prior to or without any mitigation. Thresholds of significance include:

- **Relationship to existing land use plans/estimated population and employment.**
Alternative is inconsistent with PSRC VISION 2050 Growth Strategy, Countywide Planning Policies, city growth targets, or Comprehensive Plan policies.
- **Aesthetics/scenic resources.**
 - Completely obscured views of Cascade peaks from SR 530.
 - Complete loss of rural visual and cultural landscape.

Impacts Common to All Alternatives

RELATIONSHIP TO EXISTING PLANS/ESTIMATED POPULATION & EMPLOYMENT

All alternatives would see some increase in jobs in Island Crossing, generally strengthening the local job base, in line with Comprehensive Plan and regional plan economic development goals. This would involve the conversion of some vacant and under-utilized land within city limits to more productive uses, and would support the diversification of businesses in the city, in line with Comprehensive Plan Economic Development Goal 2.

However, under all alternatives, development would be primarily oriented towards employment uses, with no new residences added. This could potentially conflict with goals and policies related to mixed-use development, and increasing the proximity of jobs and amenities that are within walking or biking distance of rural homes, such as Land Use Goal 4, VISION 2050- police MPP-DP-1, and Snohomish County Planning Policy DP-36.

AESTHETICS/SCENIC RESOURCES

Construction of buildings, parking areas, floodwater storage facilities, and other site improvements on working farmland or vacant sites is likely to occur under all alternatives. This will likely result in aesthetics in the subarea continuing to transition from a rural crossroads with a pastoral ambience, to a more developed landscape featuring fewer trees, seasonal plantings, and open spaces, and more human-made surfaces and structures including buildings and parking lots. Under all alternatives taller buildings may in some cases obscure views of Cascade mountain peaks to the east from certain specific vantage points.

Alternative 1: No Action

RELATIONSHIP TO EXISTING PLANS/ESTIMATED POPULATION & EMPLOYMENT

Alternative 1 would see modest job growth under existing development regulations and with no major investments in regional floodwater storage. Job growth would be significantly below the Comprehensive Plan targets.

Existing zoning supports the growth of highway-oriented businesses like gas stations, restaurants, and big-ticket retail operations like automotive dealerships and machinery sales. However, the requirement for on-site floodwater storage will add significant cost to development, inhibiting development. Job growth estimates for Alternative 1 are based on the 2019 Snohomish County Buildable Lands Report projection, reflecting market trends instead of the updated, aspirational Comprehensive Plan growth targets, with updates to the existing jobs total to account for recent development and vacancies.

Exhibit 3.1.2-1 Alternative 1 2044 Job Growth Projection Compared to Comprehensive Plan Target

	Existing (2025)	Net New Jobs	Total Jobs
2044 Comprehensive Plan	215	720	935
Alternative 1: No Action		77	292

Source: 2019 Snohomish County Buildable Lands Report, Arlington 2044 Comprehensive Plan, MAKERS, 2025

AESTHETICS/SCENIC RESOURCES

Under Alternative 1 the aesthetics of the subarea will likely continue to gradually transition from a rural/crossroads landscape to a developed landscape with typical “sprawl” development patterns featuring large paved areas, gas stations, restaurants, and retail stores. Views of Cascade Range mountain peaks are unlikely to be impeded by predominantly one-story construction.

Alternative 2: Subarea Plan Partial Implementation

RELATIONSHIP TO EXISTING PLANS/ESTIMATED POPULATION & EMPLOYMENT

Alternative 2 would feature updates to development regulations and design standards in line with the goals and policies of the Comprehensive Plan and other city and regional plans. Under Alternative 2, Island Crossing would see a modest increase in job growth relative to No Action, due to the better calibration of development regulations to local market conditions and bonus height for new hotel development. The types of jobs created would be better aligned with the goals of the Comprehensive Plan than under Alternative 1, with a stronger focus on linkages in with the local agricultural economy and agritourism. However, actual job growth is likely to be well below targets in the Comprehensive Plan.

Exhibit 3.1.2-2 Alternative 2 2044 Job Growth Projection Compared to Comprehensive Plan Target

	Existing (2025)	Net New Jobs	Total Jobs
2044 Comprehensive Plan	215	720	935
Alternative 2: Subarea Plan Partial Implementation		160	375

Source: Arlington 2044 Comprehensive Plan, MAKERS, 2025

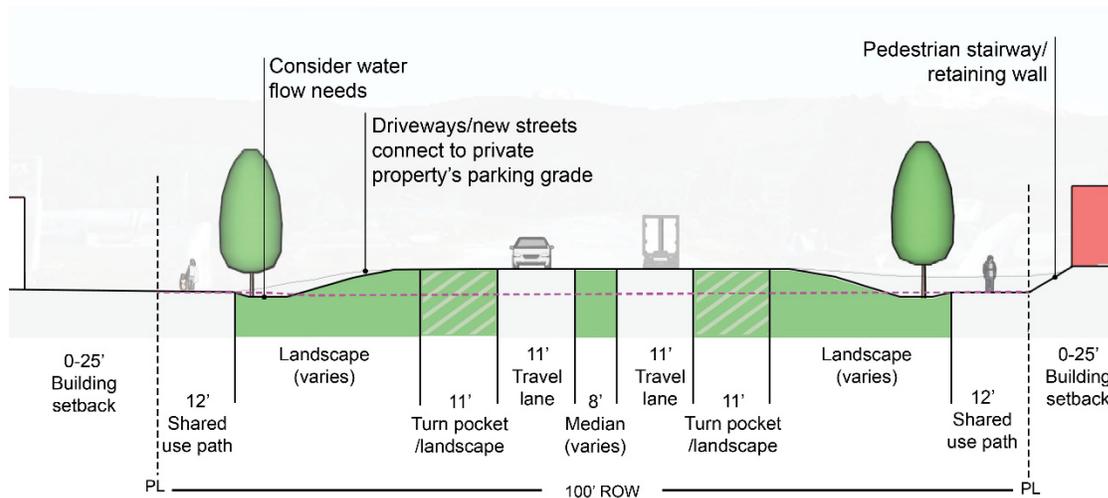
AESTHETICS/SCENIC RESOURCES

Alternative 2 would see a level of new development similar to Alternative 1, gradually transitioning the area towards a more developed landscape. However, Alternative 2 includes adoption of design standards that would improve the appearance of commercial development along the primary view corridor on SR 530.

This alternative also includes reconstruction and elevation of SR 530 through the subarea to reduce vulnerability to floods and improve aesthetics. The rebuilt roadway would feature the addition of trees and landscaped areas along the roadway, as well as shared use paths for walking, rolling, and cycling. These would improve the aesthetic experience for motorists on

SR 530 and for pedestrians on the paths. The elevated roadway would have improved views of Cascade peaks to the east and surrounding farmland and riverine landscapes. Some of the mountain views may be obscured as the trees mature, but relatively narrow and short tree species could be selected to limit view impacts.

Exhibit 3.1.2-3 Cross-section of proposed SR 530 conceptual design



Note: Not to scale; conceptual design for planning purposes only.

Source: MAKERS, 2025

Alternative 3: Subarea Plan Full Implementation

RELATIONSHIP TO EXISTING PLANS/ESTIMATED POPULATION & EMPLOYMENT

Under Alternative 3 the development regulation updates and transportation improvements included in Alternative 2 are augmented with investment in a regional floodwater compensatory storage facility, reducing development costs for most properties in the subarea. As a result, Alternative 3 would likely see significant job growth in sectors like hospitality, agritourism, dining, and retail. Overall job growth under Alternative 3 is similar to (though somewhat below) what was projected for the area under the Comprehensive Plan.

Alternative 3 aligns well with the goals of the Comprehensive Plan, especially economic development goals and policies related to economic diversification (goals ED-1 and ED-2 and related policies), developing tourism (ED 3.7 and 8.3), growing distributed economic hubs (ED 7.1 and 7.7), and pursuing businesses that can improve quality of life in Arlington (goal ED-8). It aligns well with land use goals and policies related to creating unique community centers in different parts of the city (LU 4.2 and 4.3), more comfortable environments for walking and biking (LU 1.4), compact, high-quality communities (LU 7.3), and improving and revising development regulations to remove unnecessary hinderances to development (LU 2.1).

Exhibit 3.1.2-4 Alternative 3 2044 Job Growth Projection compared to Comprehensive Plan Target

	Existing (2025)	Net New Jobs	Total Jobs
Comprehensive Plan	215	720	935
Alternative 3: Subarea Plan Full Implementation		610	825

Source: Arlington 2044 Comprehensive Plan, MAKERS, 2025

AESTHETICS/SCENIC RESOURCES

Like Alternative 2, Alternative 3 includes design standards that, with redevelopment, would help improve the appearance of commercial development along the SR 530 view corridor. It also includes rebuilding SR 530 and the addition of trees, landscaped areas, and shared use paths along the roadway, with similar aesthetic benefits and impacts as Alternative 2.

Because Alternative 3 would see significantly more development than Alternative 2, with more numerous and likely taller buildings, there is more potential for views of Cascade Range peaks to be obscured by multi-story buildings, including from the SR 530 corridor and the I-5 interchange/gateway area.

3.1.3 Mitigation Strategies

Incorporated Plan Features

ESTIMATED POPULATION AND EMPLOYMENT

The Subarea Plan features a range of measures to increase commercial development feasibility. These measures include:

- Updates to development regulations to reduce barriers to desired development.
- Design standards requiring new street connections, improving connectivity in areas not currently well served by the street grid.
- Investment in regional floodwater compensatory storage to reduce development costs for individual property owners.
- Investment in streetscape and roadway infrastructure to improve the functionality, resilience, and attractiveness of the public realm.
- Other utility improvements to support new development.

With all planned measures in place, the projected employment for the subarea nearly achieves the targets of the adopted Comprehensive Plan. The employment mix, which would feature more agritourism and hospitality sector jobs, is better aligned with the Comprehensive Plan than the Alternative 1 employment mix.

AESTHETICS/SCENIC RESOURCES

CASCADE VIEWS

The Subarea Plan incorporates a conceptual design (see Exhibit 3.2.2-5 SR 530 Concept Cross-section) for the reconstruction of SR 530 to limit vulnerability of the roadway to closure due to flooding by elevating the roadway above flood levels. Elevation of the roadway will also help mitigate the impact of taller and more numerous buildings on scenic views of Cascade Range peaks to the east from SR 530.

DESIGN STANDARDS

Design standards to be adopted with the Subarea Plan will require development within Island Crossing to incorporate elements of architectural character, massing, and exterior finish materials that reflect the region's agricultural heritage. These standards will help to mitigate impacts of new development on the area's rural aesthetic landscape.

Regulations and commitments

State and local law require new development to conform to minimum standards for safety, compatibility, and consistent with adopted infrastructure plans.

- Arlington's Zoning Code ([AMC Title 20: Zoning](#)) and citywide [Development Design Standards](#) regulate land use, landscaping, parking, design, and other aspects of development to ensure development meets the City's long-term vision.
- Arlington's [Engineering Standards](#) regulate street design.
- Also see 3.4.3 Mitigation Strategies for environmental regulations that impact land use and development.
- As required by GMA (RCW 36.70A.106), the City must submit proposed Comprehensive Plan amendments and updated regulations for review and comment by the State prior to final adoption.

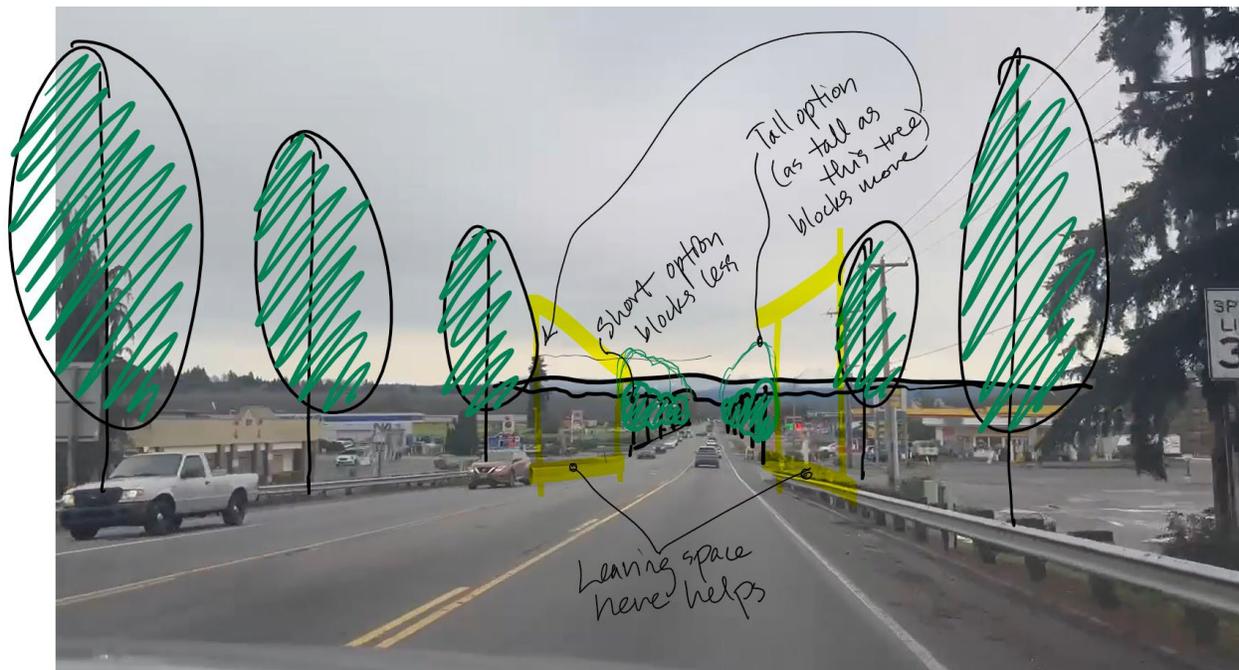
Other Potential Mitigation Measures

SR 530 TREE SPACING AND SPECIES SELECTION

In addition to roadway elevation, the conceptual designs for SR 530 would include landscaping, a shared use path, and trees planted along both sides of the roadway. As these

trees mature their crowns will expand in height and width, potentially obscuring views of the Cascade peaks from SR 530. Designs for tree planting with sufficient spacing between trees, and use of tree species that maintain a narrow, columnar crown would mitigate the potential for impact to cascade views. Use of tree species with a lower height and broader crown for portions of the roadway to the east would help avoid blocking mountain views from the interchange/gateway area. Avoiding the planning of street trees along elevated portion of SR 530 that rises towards the interchange would also limit view impacts.

Exhibit 3.1.3-1 SR 530 tree height and spacing considerations.



Source: MAKERS, 2025

3.1.4 Significant Unavoidable Adverse Impacts

Alternatives 1 and 2 fail to align with adopted growth targets under the Arlington Comprehensive Plan, creating a significant impact under the threshold established in section 3.1.2.

With implementation of the planned improvements in the study area and proposed mitigation measures, there would be no significant and unavoidable impacts related solely to the proposed alternatives.

3.2 Transportation

This chapter provides an understanding of current transportation conditions and the potential transportation-related impacts of the development alternatives for the Arlington Island Crossing Subarea.

3.2.1 Affected Environment

This section describes existing transportation conditions and key facilities near the Island Crossing Subarea. Information is provided regarding the non-motorized facilities, transit service and facilities, traffic volumes, traffic operations and traffic safety in the study area. The study area defined for this analysis is as follows:

- I-5 Southbound Ramps/SR 530
- I-5 Northbound Ramps/SR 530
- Smokey Point Boulevard/SR 530
- Smokey Point Boulevard/Smokey Point Boulevard
- Smokey Point Boulevard/200th Street NE

A map of the subarea location and study area intersections is shown on Exhibit 3.2.1-1.

Exhibit 3.2.1-1 Study Area



Source: Transpo Group, 2025

NON-MOTORIZED FACILITIES

Existing non-motorized facilities in the Island Crossing subarea include pedestrian crossings located at the signalized intersection of the I-5 on and off ramps and SR 530 (intersection #1 and #2 on Exhibit 3.2.1-1), across SR 530 at the west fork of the Smokey Point Boulevard intersection (between #3 and #6), and midway along the east fork of the Smokey Point Boulevard/SR 530 intersection (between #3 and #4). There are no sidewalks or bicycle facilities along SR 530 or Smokey Point Boulevard within the Island Crossing subarea. Paved shoulders along SR 530 may be wide enough to accommodate non-motorized travelers, including bicyclists, though the volume, proximity, and speed of adjacent vehicle traffic may discourage this use.

The Pedestrian and Bicycle Plans (both dated October 2018) identify Smokey Point Boulevard as critical to citywide non-motorized connectivity. Connectivity to the Smokey Point Transit Center is also identified as a high priority. The project identified to enhance connectivity to the Smokey Point Transit Center is a multi-use trail along Smokey Point Boulevard from 188th Street to SR 530.

TRANSIT

Transit in this area is provided through Island Crossing by Community Transit, though there are no bus stops in Island Crossing. Route 201 travels north-south along Smokey Point Boulevard to Smokey Point Transit Center south of the subarea, where routes 220 and 230 connect to historic downtown Arlington to the east.

ROADWAY NETWORK

The key roadways serving the Island Crossing subarea are described below.

Interstate 5 (I-5) is a north-south interstate with speed limits of 60-70 mph that provides regional access to the Island Crossing subarea via SR 530. I-5 is a designated freight route and strategic freight corridor within the study area.

SR 530 is an east-west other principal arterial that connects I-5 to the west and SR 9 to the east. It is a two-lane roadway within the study area with posted speed limits of 35 to 55 mph. No parking is allowed and there are no pedestrian or bicycle facilities provided within the study area except for the crosswalk across SR 530 at the west fork of the Smokey Point Boulevard intersection (between #3 and #6). SR 530 is a designed freight route and strategic freight corridor within the study area.

Smokey Point Boulevard is a north-south arterial that meets SR 530 on the east boundary of the Island Crossing subarea. It is a two-lane roadway within the study area with posted speed limits of 35 to 40 mph. Smokey Point Boulevard is a designated freight route. No parking is

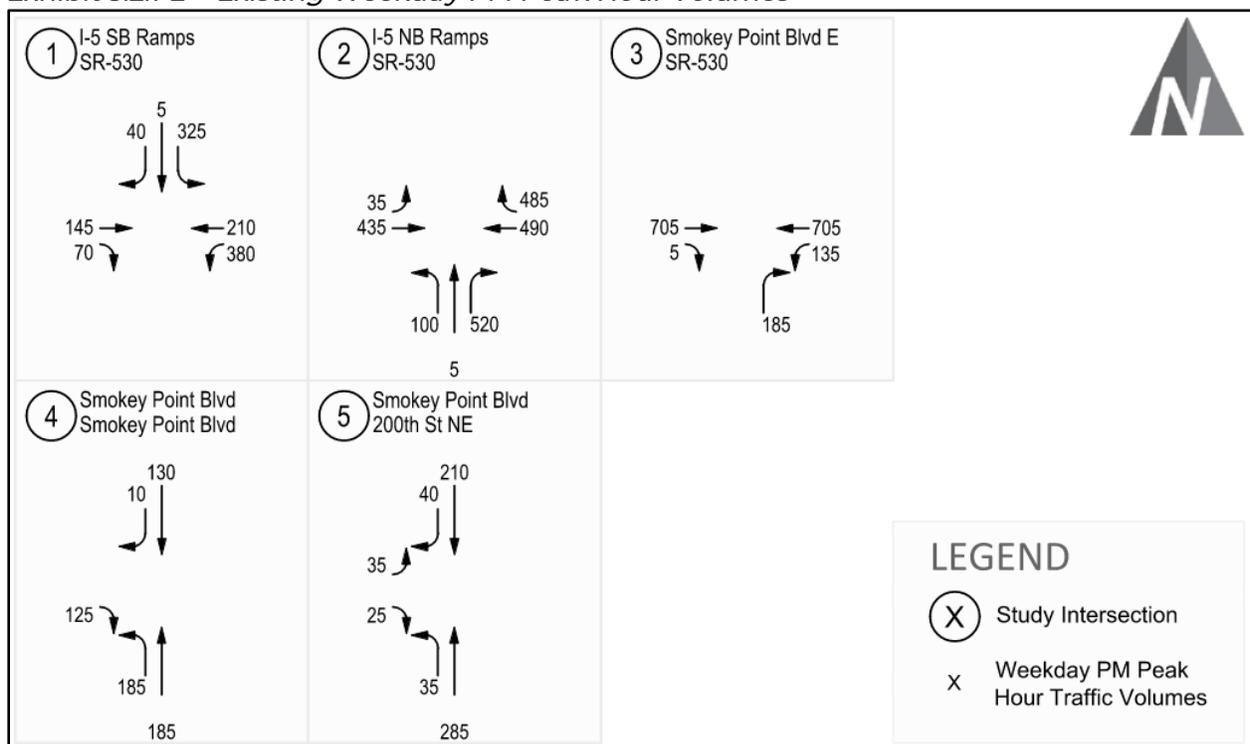
allowed and there are no pedestrian or bicycle facilities provided within the study area except for the crosswalk midway along the east fork of the Smokey Point Boulevard/SR 530 intersection (between #3 and #4). Smokey Point Boulevard currently meets SR 530 at two separate locations, which will be reconfigured with the planned improvement to provide a roundabout at the east intersection (#3) and change the west intersection (#4) to a one-way southbound for the fork between SR 530 and Smokey Point Boulevard.

200th Street is an east-west roadway located west of the City of Arlington boundary in unincorporated Snohomish County. It is a two-lane roadway with a posted speed limit of 25 mph just south of the study area. No parking is allowed and there are no pedestrian or bicycle facilities provided within the study area.

TRAFFIC VOLUMES

Existing traffic counts were collected in June 2022 for the study intersections. The weekday PM peak hour (one hour between 4 and 6 p.m.) is typically used by the City in evaluating transportation system needs as it represents the highest travel activity experienced during the day. The detailed traffic count worksheets are provided in Appendix B. Existing weekday PM peak hour volumes are shown on Exhibit 3.2.1-2. The weekday PM peak hour traffic volume along SR 530 within the Subarea is about 1,400 vehicles per hour and along Smokey Point Boulevard is about 500 vehicles per hour.

Exhibit 3.2.1-2 Existing Weekday PM Peak Hour Volumes



Source: Transpo Group, 2025

TRAFFIC OPERATIONS

Weekday PM peak hour traffic operations were evaluated at the study intersections based on level of service (LOS). The analysis was based on procedures identified in the *Highway Capacity Manual* 7th Edition using Synchro 12.0. For signalized intersections, LOS is measured in average delay per vehicle and is reported for the intersection as a whole. At side-street stop-controlled intersections LOS is measured in average delay per vehicle during the peak hour of traffic and is reported for the worst operating approach or movement of the intersection. Traffic operations and average vehicle delay for an intersection can be described qualitatively with a range of levels of service (LOS A through LOS F), with LOS A indicating free-flowing traffic and LOS F indicating extreme congestion and long vehicle delays.

The study intersections are in the City of Arlington and WSDOT jurisdictions. The City of Arlington has adopted LOS D for City arterials. WSDOT has an adopted LOS C standard for I-5 and SR 530 in the study area. Exhibit 3.2.1-3 summarizes the existing weekday PM peak hour intersection operations at the study intersections.

Exhibit 3.2.1-3 Existing Weekday PM Peak Hour Level of Service Summary

Intersections	Traffic Control	LOS Standard	LOS ¹	Delay ²	WM ³
1. I-5 Southbound Ramps/SR 530	Signal	C	C	25.5	-
2. I-5 Northbound Ramps/SR 530	Signal	C	F	91.7	-
3. Smokey Point Boulevard/SR 530	Two-Way Stop	C	C	22.0	NBR
4. Smokey Point Boulevard/Smokey Point Boulevard	Two-Way Stop	C	A	9.7	EBR
5. Smokey Point Boulevard/200th Street NE	Two-Way Stop	D	B	12.8	EB

Source: Transpo Group, 2025

Notes: **Red bold** indicates LOS standard is not met.

1. Level of service (LOS) based on *Highway Capacity Manual* 7th Edition.
2. Average delay in seconds per vehicle.
3. Worst movement reported for unsignalized intersections where NBR = northbound right-turn, EBR = eastbound right-turn, and EB = eastbound.

As shown in Exhibit 3.2.1-3, the intersection of the I-5 Northbound Ramps at SR 530 does not meet the adopted LOS C standard during the weekday PM peak hour and is operating at LOS F. Detailed LOS worksheets are provided in Appendix C.

TRAFFIC SAFETY

Collision data for the most recent five-year period for intersections was reviewed to identify potential safety issues within the study area. The Washington State Department of Transportation (WSDOT) reported collision data between January 1, 2020, and December 31, 2024 is summarized in Exhibit 3.2.1-4.

Exhibit 3.2.1-4 Five Year Collision Summary – 2020 to 2024

Location	Traffic Control	Number of Collisions					Total	Annual Average	Collisions per MEV ¹
		2020	2021	2022	2023	2024			
1. I-5 Southbound Ramps/SR 530	Signal	7	5	5	7	8	32	6.40	1.49
2. I-5 Northbound Ramps/SR 530	Signal	7	6	2	8	4	27	5.40	0.71
3. Smokey Point Boulevard/SR 530	Two-Way Stop	2	1	1	3	4	11	2.20	0.35
4. Smokey Point Boulevard/Smokey Point Boulevard	Two-Way Stop	1	0	1	1	2	5	1.00	0.43
5. Smokey Point Boulevard/200th Street NE	Two-Way Stop	0	1	0	0	0	1	0.20	0.09

1. Collisions per million entering vehicles

Study intersections with a collision rate greater than one collision per million entering vehicles (MEV) should be considered for further review to determine if a safety issue may exist. As shown on Exhibit 3.2.1-4, all study intersections have collisions per MEVs less than one except for I-5 Southbound Ramps/SR 530. Based on the City of Arlington Comprehensive Plan, a roundabout is the recommended improvement to be installed in the future at this location. A roundabout would improve safety conditions at the intersection by reducing vehicle speeds to and through the intersection, along with creating one-way travel and reducing conflict points.

Along with a review of intersections, SR 530 and Smokey Point Boulevard collisions were also reviewed. Spatial analysis of the crashes reported on SR 530 revealed that the driveways to

the Pilot Travel Center Truck Stop were closely associated with dense clusters of rear-end crashes, the majority of which were associated with personal vehicles and not trucks. Incidents of angle crashes were more densely grouped along the driveways associated with retail, food, and travel services nearer to I-5, west of the truck stop. The analysis shows that the lack of access control and number of driveways along SR 530 is a contributing factor for crashes given the concentration of crashes near Pilot and other commercial driveways and the rear-end and angle type crashes related to following too closely, inattention, and not granting right-of-way.

Spatial analysis of crashes on Smokey Point Boulevard within Island Crossing showed that angle crashes and rear ends are clustered at the intersections of SR 530 and 204th Street NE, and fixed object crashes are clustered at curves in the roadway. Based on the analysis of contributing factors, driver behaviors, like speeding and inattention, plays a more significant role in crashes along Smokey Point Boulevard within Island Crossing than infrastructure design.

3.2.2 Potential Impacts

The transportation impacts of the No Action and Action Alternatives are described in this section. Transportation impacts are identified through a comparison of the No Action Alternative to the Action Alternatives.

Thresholds of Significance

The Arlington Draft Transportation Master Plan (TMP) has established vehicular and non-motorized LOS standards.

VEHICULAR

The study intersections are within Arlington and WSDOT jurisdictions. The vehicular LOS standards for the study area are described as follows:

City of Arlington LOS Standards. The City of Arlington has adopted LOS D for arterials and collectors. The City of Arlington further recognizes and adopts the most current LOS standard along state highways.

WSDOT. I-5 and SR 530 are considered rural facilities and have an adopted LOS C.

NON-MOTORIZED

Non-motorized LOS standards are based on providing the future sidewalk, pathway, and trail system within the City. This non-motorized system considers the Complete Streets Program,

which identifies a Pedestrian Plan and a Bike Plan for the City. The Draft TMP indicates locations where the adopted LOS standard is to have pedestrian or bicycle facilities that complete the City's network. The standard for SR 530 and Smokey Point Boulevard within the Island Crossing subarea is to have pedestrian facilities on both sides of the streets and provide for bicycle facilities. It is noted that these roadways currently do not meet this standard within the subarea.

Impacts Common to All Alternatives

The following conditions and impacts are common to all alternatives, including the No Action Alternative.

PLANNED IMPROVEMENTS

Several transportation improvement projects are currently planned in and around the study area. Key projects are discussed below.

- SR 530/Smokey Point Blvd intersection. Construction of a roundabout at the SR 530/Smokey Point Blvd intersection. This project is being coordinated with WSDOT, Stillaguamish Tribe, City of Arlington, and Snohomish County. The project is part of the City of Arlington 6-Year Transportation Improvement Plan (TIP) 2025-2030.
- I-5/SR 530 Interchange. This interchange has been identified in Comprehensive Plan Appendix H Draft Transportation Master Plan (TMP), June 2024 for improvements. Potential improvements include providing a roundabout at both the northbound and southbound ramps and bridge improvements and widening to include sidewalks and bike facilities.
- Smokey Point Boulevard/200th Street NE. Improvements were identified in Comprehensive Plan Appendix H Draft Transportation Master Plan (TMP), June 2024 for this intersection. Potential improvements include providing a roundabout.
- Smokey Point Boulevard 200th Street NE to SR 530. Widen to a 3-lane facility including sidewalks.
- Smokey Point Boulevard 200th Street NE to SR 530. Provide a multi-use trail along the Smokey Point Boulevard.

The improvements described above were assumed as part of the analysis to address LOS issues consistent with those identified in the Comprehensive Plan for the year 2044.

TRANSIT

As described in the Affected Environment, transit is not provided within the study area. Journey 2050: Community Transit Long Range Transit Plan, December 2023 does not identify plans for new fixed route transit services within the study area and serving Island Crossing. Journey 2050 does discuss alternative transit like microtransit, which could be an option for Island Crossing in the future where services are on-demand. With all the alternatives, there could be additional demand for transit services and without transit travelers would use other modes.

TRAFFIC FORECASTS

Future (2044) weekday PM peak hour traffic forecasts for all the Alternatives were developed using the City of Arlington travel demand model. The land use (outside of the Island Crossing subarea) and transportation system assumptions are the same for all Alternatives. The Island Crossing subarea land use and quantities were adjusted within the City's travel demand model for each Alternative. The City's travel demand model is used for the Island Crossing subarea trip distribution and assignment to the study area. Future 2044 forecasts are developed by adding intersection volume growth identified between the model base and future years to the existing traffic volumes. Adjustments are made to the traffic volumes for balancing. This methodology is an industry standard practice for post-processing raw travel demand model results into forecast traffic volumes.

Alternative 1: No Action

The No Action Alternative transportation impacts are described in this section. The No Action scenario reflects no regulatory changes resulting in lower density of land use and no additional investments beyond what is identified in the TMP as described in the previous section.

NON-MOTORIZED FACILITIES

Along with the planned improvements described previously, the No Action Alternative would provide the Island Crossing Trail, which is a multi-use trail along SR 530 between Smokey Point Boulevard and the I-5 interchange. This improvement was identified in the TMP. It is assumed that frontage improvements would be provided as properties develop to provide sidewalks and bicycle facilities to meet the non-motorized LOS standard.

TRAFFIC VOLUMES

No Action Alternative volume forecasts for the Island Crossing subarea assumes 292 jobs. Volumes for the No Action Alternative were developed using the Arlington travel demand model. Exhibit 3.2.2-1 provides a summary of the forecast No Action Alternative weekday PM peak hour trip generation.

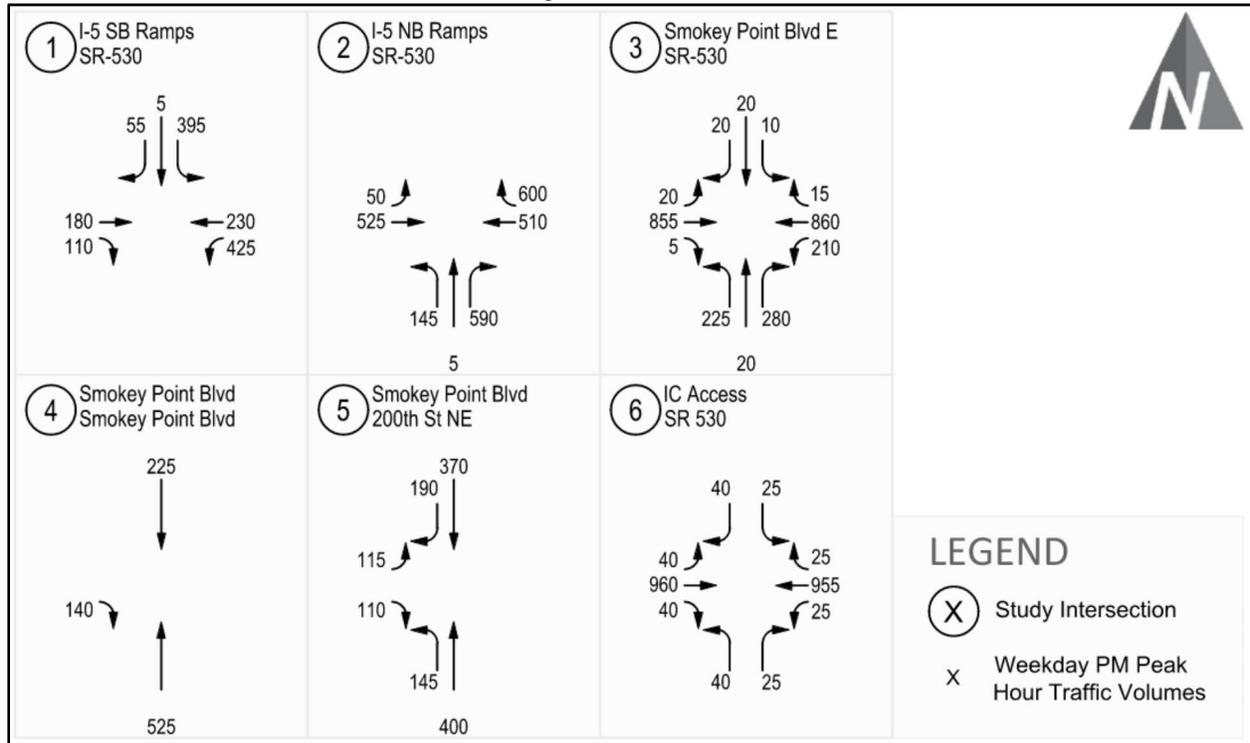
Exhibit 3.2.2-1 2044 Island Crossing Subarea No Action Weekday PM Peak Hour Trip Generation

Land Use	Total Trips
Residential	3
Office	27
Retail	1,228
Total	1,258

Source: Arlington Travel Demand Model, Transpo Group, June 2025

As shown in Exhibit 3.2.2-1, a total of 1,258 weekday PM peak hour trips are anticipated to be generated under the No Action Alternative. The travel demand model was used to distribute and assign the Subarea trip generation. The total 2044 No Action Alternative volumes (2044 forecast plus No Action Alternative trips) are shown on Exhibit 3.2.2-2.

Exhibit 3.2.2-2 2044 No Action Weekday PM Peak Hour Volumes



Source: Transpo Group, 2025

TRAFFIC OPERATIONS

Traffic operations were evaluated based on intersection operations within the defined study area. For roundabout controlled intersections, LOS is measured in average delay per vehicle and is reported for the intersection as a whole. In addition, the volume-to-capacity (v/c) ratio is reported for roundabouts. WSDOT typically considers a v/c of 0.90 as the threshold for a roundabout.

Exhibit 3.2.2-3 provides a summary of the intersection operations with the planned and proposed roundabouts installed. Detailed LOS worksheets are provided in Appendix C.

Exhibit 3.2.2-3 2044 No Action Weekday PM Peak Hour Level of Service Summary

Intersections	Traffic Control	LOS Standard	2044 No Action		
			LOS ¹	Delay ²	WM ³ or v/c ⁴
1. I-5 Southbound Ramps/SR 530	<u>Proposed Roundabout</u>	C	B	13.1	0.64
2. I-5 Northbound Ramps/SR 530	<u>Proposed Roundabout</u>	C	B	11.4	0.91
3. Smokey Point Boulevard/SR 530	<u>Planned Roundabout</u>	C	C	23.1	1.03
4. Smokey Point Boulevard/Smokey Point Boulevard	Two-Way Stop	C	B	10.7	EB
5. Smokey Point Boulevard/200th Street NE	<u>Proposed Roundabout</u>	D	A	6.0	0.48

Source: Transpo Group, 2025

Notes: **Bold** indicates LOS standard is not met or V/C ratio higher than 0.90 threshold.

2. Level of service (LOS) based on Highway Capacity Manual 7th Edition methodology unless otherwise noted.

3. Average delay in seconds per vehicle.

4. Worst movement reported for unsignalized intersections where EB = eastbound.

5. v/c (volume/capacity) reported for roundabout intersections.

As shown in Exhibit 3.2.2-3, all study intersections are projected to operate at LOS C or better during the weekday PM peak hour with the No Action meeting the LOS standard. The Smokey Point Boulevard/SR 530 and I-5 Northbound Ramps/SR 530 intersections would have a v/c ratio higher than 0.90; therefore, widening may be needed with the No Action Alternative to accommodate the growth if it is desired to maintain the 0.90 threshold. The Smokey Point Boulevard/SR 530 roundabout is currently being designed to allow for future expansion. A northbound right-turn lane may be needed at the I-5 Northbound Ramps/SR 530 intersection as part of the roundabout improvement. Transportation mitigation measures are described in section in 3.2.3.

TRAFFIC SAFETY

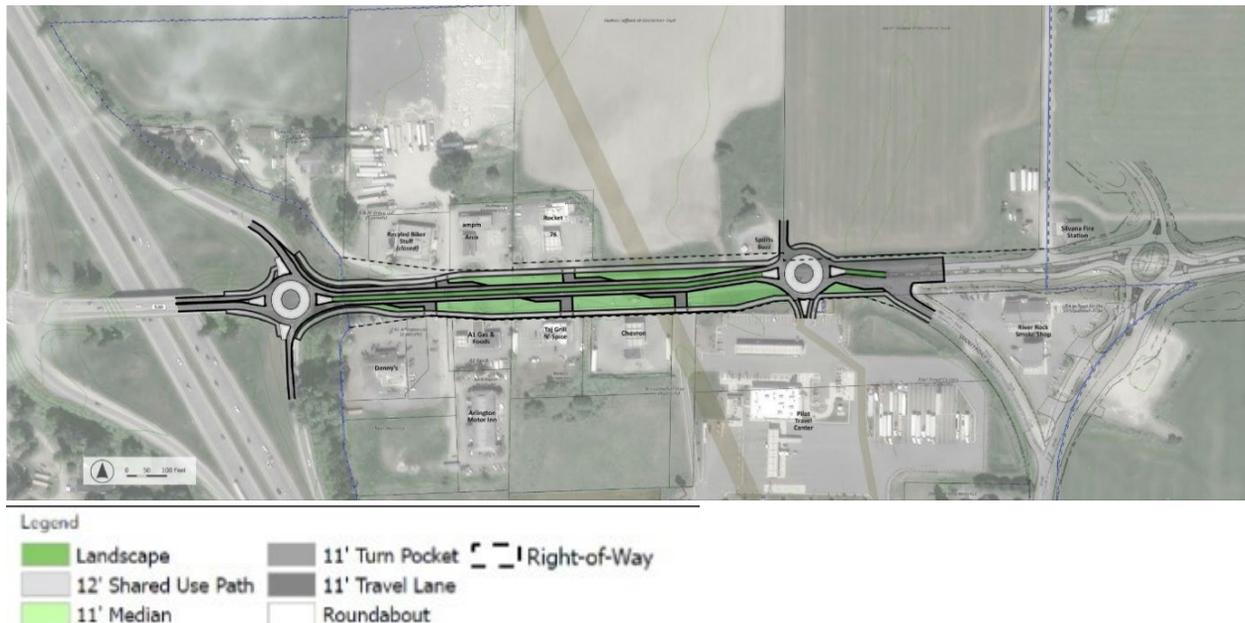
Traffic generated by the No Action Alternative results in a proportionate increase in the probability of collisions. However, the planned non-motorized facilities would enhance safety for pedestrians and bicyclists and roundabouts at major intersections would help reduce travel speeds and severity of collisions. The No Action Alternative is not proposing specific access control or consolidation of driveways; therefore, conflicts are likely to increase along SR 530 and safety issues may also proportionally increase. In addition, this alternative would

not elevate SR 530 so periodic flooding would continue, which could result in flood related safety challenges.

Alternative 2: Subarea Plan Partial Implementation

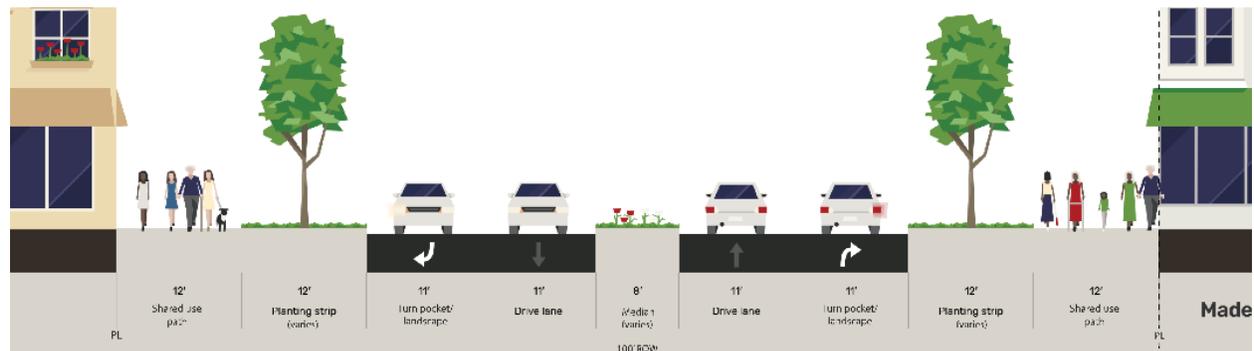
Alternative 2 transportation impacts are described in this section. Alternative 2 would have regulatory changes that accommodate additional density within the Subarea and additional transportation improvements beyond what is planned in the TMP. Exhibit 3.2.2-4 illustrates the street design concept including a new roundabout controlled intersection SR 530 between I-5 and Smokey Point Boulevard and consolidation of driveways. Exhibit 3.2.2-5 shows the proposed street concept with Alternative 2. The cross section has a 12-foot shared use path on both sides of SR 530, a center landscape median, one through travel lane in each direction with right-turn lanes at access points.

Exhibit 3.2.2-4 SR 530 Street Design Concept Plan View



Source: Arlington Island Crossing Subarea Plan

Exhibit 3.2.2-5 SR 530 Concept Cross-section



Source: Arlington Island Crossing Subarea Plan

NON-MOTORIZED FACILITIES

Alternative 2 would provide an enhanced environment for non-motorized travel compared to the No Action Alternative. The street design for SR 530 consolidates the property access points to reduce the number of driveways along SR 530 resulting in fewer crossings for pedestrians and bicyclists. The center median restricts driveways along SR 530 to right-in/right-out movements to reduce conflicts and reduces speeds along the corridor to improve safety. Midblock crossings with traffic control such as a rectangular rapid flashing beacon (RRFB) are also planned on SR 530 to improve pedestrian safety along the corridor and facilitate movement of pedestrians to businesses on both sides of the street. The improved pedestrian access will allow for visitors to park once and access multiple users on foot rather than driving within Island Crossing. Alternative 2 would meet the non-motorized LOS standards.

TRAFFIC VOLUMES

Alternative 2 volume forecasts for the Island Crossing subarea reflects 375 jobs compared to 292 jobs with the No Action Alternative. Trip generation for Alternative 2 was determined using the Arlington travel demand model consistent with the No Action Alternative. Exhibit 3.2.2-6 provides a comparison of the No Action and Alternative 2 weekday PM peak hour trip generation.

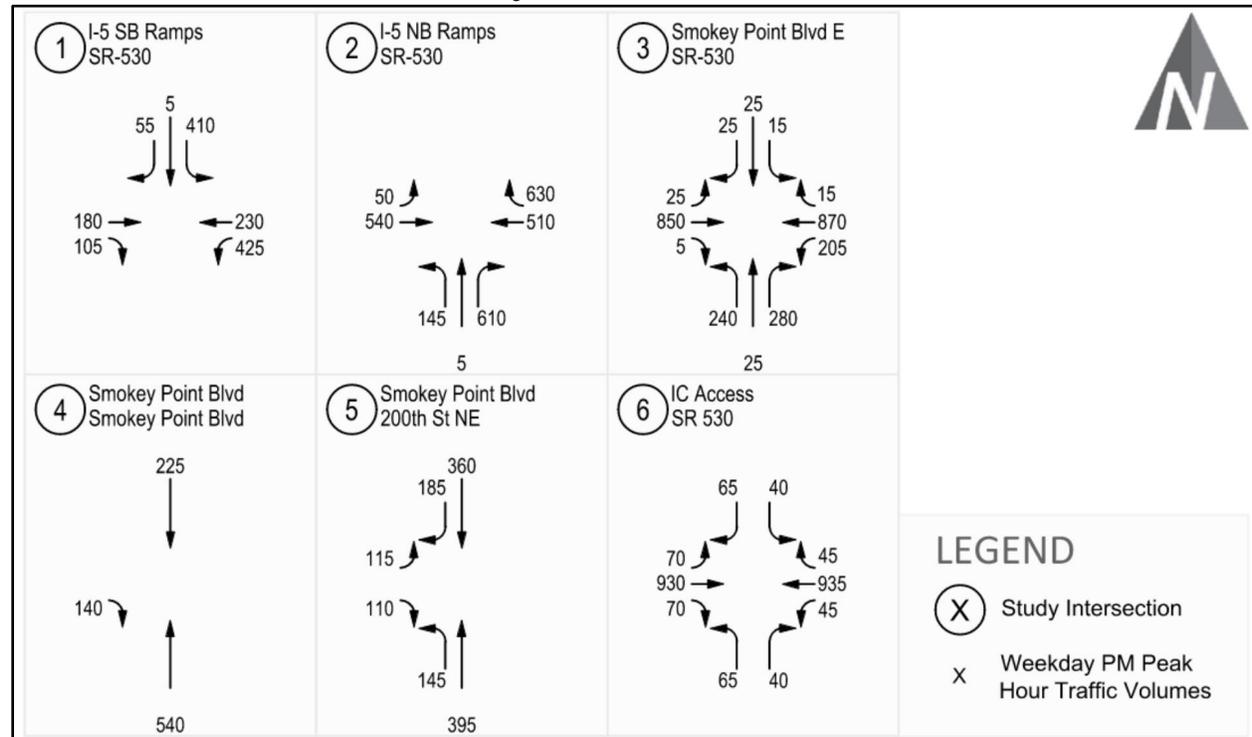
Exhibit 3.2.2-6 Comparison of No Action and Alternative 2 Weekday PM Peak Hour Trip Generation

Land Use	No Action Total Trips	Alternative 2 Total Trips
Residential	3	2
Office	27	0
Retail	1,228	1,611
Total	1,258	1,613

Source: Arlington Travel Demand Model, Transpo Group, June 2025

As shown in Exhibit 3.2.2-6, a total of 1,613 weekday PM peak hour trips are anticipated to be generated under the Alternative 2, which is 385 trips more than the No Action Alternative. The travel demand model was used to distribute and assign the Subarea trip generation. The total Alternative 2 volumes (2044 forecast plus Alternative 2 trips) are shown on Exhibit 3.2.2-7.

Exhibit 3.2.2-7 Alternative 2 Weekday PM Peak Hour Volumes



Source: Transpo Group, 2025

TRAFFIC OPERATIONS

Traffic operations were evaluated based on intersection operations within the defined study area. Exhibit 3.2.2-8 provides a comparison of the No Action and Alternative 2 traffic operations. Detailed LOS worksheets are provided in Appendix C.

Exhibit 3.2.2-8 Comparison of No Action and Alternative 2 2044 Weekday PM Peak Hour Level of Service

Intersections	Traffic Control	LOS Standard	No Action			Alternative 2		
			LOS ¹	Delay ²	WM ³ or v/c ⁴	LOS ¹	Delay ²	WM ³ or v/c ⁴
1. I-5 Southbound Ramps/SR 530	Proposed Roundabout	C	B	13.1	0.64	B	13.2	0.65
2. I-5 Northbound Ramps/SR 530	Proposed Roundabout	C	B	11.4	0.91	B	13.2	0.94
3. Smokey Point Boulevard/SR 530	Planned Roundabout	C	C	23.1	1.03	C	27.7	1.06
4. Smokey Point Boulevard/Smokey Point Boulevard	Two-Way Stop	C	B	10.7	EB	B	10.7	EB
5. Smokey Point Boulevard/200th Street NE	Proposed Roundabout	D	A	6.0	0.48	A	6.0	0.47
6. Island Crossing Access/SR 530	New Roundabout	C	-	-	-	A	6.6	0.84

Source: Transpo Group, 2025

Notes: **Bold** indicates LOS standard is not met or V/C ratio higher than 0.90 threshold.

1. Level of service (LOS) based on Highway Capacity Manual 7th Edition.
2. Average delay in seconds per vehicle.
3. Worst movement reported for unsignalized intersections where EB = eastbound.
4. v/c (volume/capacity) reported for roundabout intersections.

As shown in Exhibit 3.2.2-8, Alternative 2 would result in some increase in intersection delay compared to the No Action Alternative but all study intersections would continue to operate at LOS C or better meeting the LOS standard. Similar to the No Action Alternative, with Alternative 2, the Smokey Point Boulevard/SR 530 and the I-5 Northbound Ramps/SR 530 intersections would have a v/c ratio higher than 0.90. As discussed previously, widening the roundabout may be needed to accommodate future growth to maintain the 0.90 threshold. The Smokey Point Boulevard/SR 530 roundabout is currently being designed to allow for

future expansion and a northbound right-turn lane may need to be considered for the I-5 Northbound Ramps. Transportation mitigation measures are described in section in 3.2.3.

TRAFFIC SAFETY

Traffic generated by Alternative 2 could result in a proportionate increase in the probability of collisions; however, Alternative 2 incorporates street design features to address existing safety issues. The street design for SR 530 consolidates the property access points to reduce the number of driveways along SR 530 resulting in fewer conflict points along the corridor. The center median restricts driveways along SR 530 to right-in/right-out movements to reduce conflicts and reduces speeds along the corridor to improve safety. Roundabouts along the corridor will also help slow speeds, reduce conflicts and enhance safety. In addition, midblock crossings that would include traffic control such as a rectangular rapid flashing beacon (RRFB) are planned on SR 530 to improve pedestrian safety. This alternative would elevate SR 530 so safety issues related to flood would be eliminated.

Alternative 3: Subarea Plan Full Implementation

Alternative 3 impacts are described in this section. Alternative 3 would see increased development activity, resulting in more job density than the other alternatives. The planned SR 530 street design would be the same as Alternative 2.

NON-MOTORIZED FACILITIES

Alternative 3 would have the same non-motorized impacts of Alternative 2 except the number of pedestrians and bicyclists within the Subarea could be higher with more density. The planned non-motorized facilities would accommodate additional pedestrians and bicyclists with Alternative 3. In addition, it is anticipated with a higher level of development it is anticipated that there would be interconnectivity between properties providing greater improvement in pedestrian and bicycle mobility within the subarea. Alternative 3 would meet the non-motorized LOS standards.

TRAFFIC VOLUMES

Alternative 3 allows for additional development resulting in up to 825 jobs (533 more jobs than No Action and 475 more jobs than Alternative 2). Alternative 3 trip generation was determined using the Arlington travel demand model. Exhibit 3.2.2-9 provides a summary of the weekday PM peak hour trip generation for all the Alternatives.

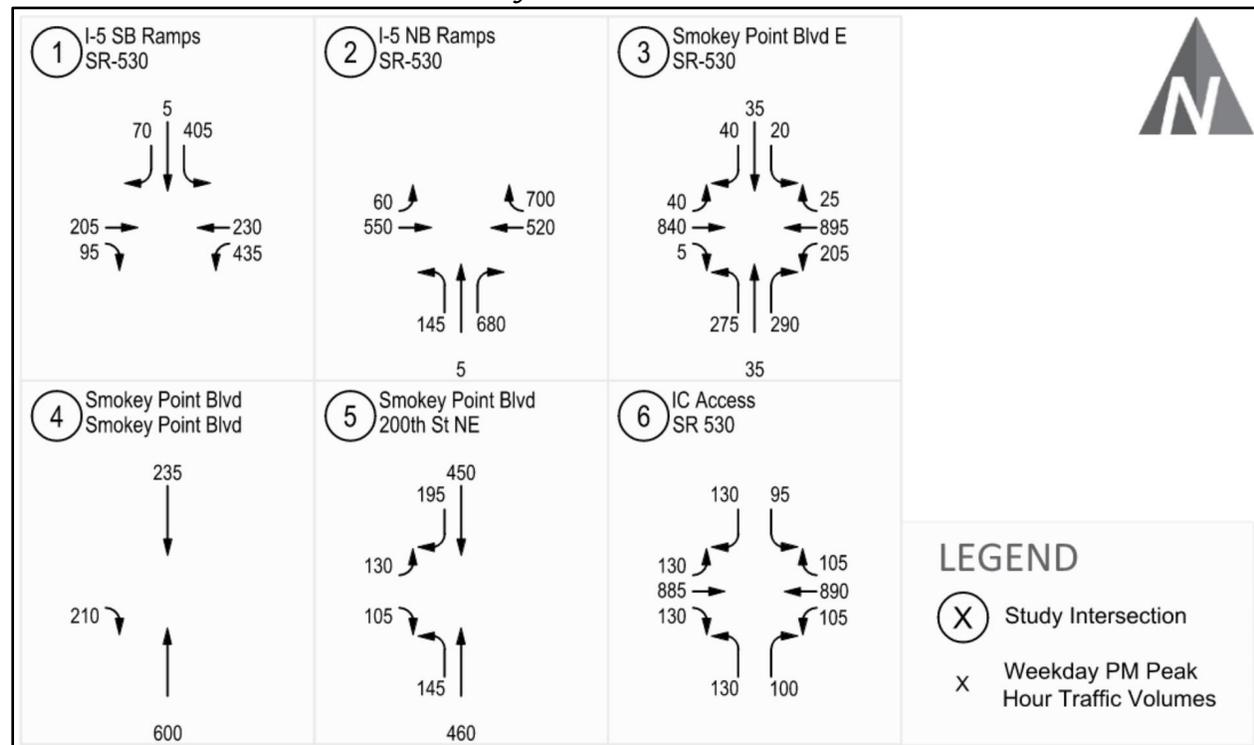
Exhibit 3.2.2-9 No Action and Action Alternatives Weekday PM Peak Hour Trip Generation

Land Use	No Action Total Trips	Alternative 2 Total Trips	Alternative 3 Total Trips
Residential	3	2	2
Office	27	0	0
Retail	1,228	1,611	3,507
Total	1,228	1,613	3,509

Source: Arlington Travel Demand Model, Transpo Group, June 2025

As shown in Exhibit 3.2.2-9, a total of 3,509 weekday PM peak hour trips are anticipated to be generated under Alternative 3, which is about three times more than the No Action and two times more than Alternative 2. The total Alternative 3 volumes (2044 forecast plus Alternative 3 trips) are shown on Exhibit 3.2.2-10.

Exhibit 3.2.2-10 Alternative 3 Weekday PM Peak Hour Volumes



Source: Transpo Group, 2025

TRAFFIC OPERATIONS

Traffic operations were evaluated based on intersection operations within the defined study area. Exhibit 3.2.2-11 provides a summary of the intersection operations for Alternative 3 compared to the No Action and Alternative 2 conditions. Detailed LOS worksheets are provided in Appendix C.

Exhibit 3.2.2-11 Comparison of No Action and Action Alternatives 2044 Weekday PM Peak Hour Level of Service Summary

Intersections	Traffic Control	LOS Standard	No Action			Alternative 2			Alternative 3		
			LOS ¹	Delay ²	WM ³ or v/c ⁴	LOS	Delay	WM or v/c	LOS	Delay	WM or v/c
1. I-5 SB Ramps/SR 530	Prop. RAB	C	B	13.1	0.64	B	13.2	0.65	B	13.3	0.66
2. I-5 NB Ramps/SR 530	Prop. RAB	C	B	11.4	0.91	B	13.2	0.94	C	21.4	1.05
3. Smokey Point Boulevard/ SR 530	Planned RAB	C	C	23.1	1.03	C	27.7	1.06	D	43.9	1.16
4. Smokey Point Boulevard/ Smokey Point Boulevard	Two-Way Stop	C	B	10.7	EB	B	10.7	EB	B	11.5	EB
5. Smokey Point Boulevard/ 200th Street NE	Prop. RAB	D	A	6.0	0.48	A	6.0	0.47	A	6.2	0.56
6. Island Crossing Access/SR 530	New RAB	C	-	-	-	A	6.6	0.84	B	16.8	0.96

Source: Transpo Group, 2025

Notes: **Red bold** indicates LOS standard is not met or V/C ratio higher than 0.90 threshold.

1. Level of service (LOS) based on Highway Capacity Manual 7th Edition.
2. Average delay in seconds per vehicle.
3. Worst movement reported for unsignalized intersections where EB = eastbound.
4. v/c (volume/capacity) reported for roundabout intersections.

As shown in Exhibit 3.2.2-11, Alternative 3 would result in increases in intersection delay compared to the No Action Alternative and Alternative 2. The Smokey Point Boulevard/SR

530 intersection would operate at LOS D and not meet the LOS C standard. The Smokey Point Boulevard/SR 530 and I-5 Northbound Ramps/SR 530 intersections would have a v/c ratio higher than 0.90 like the evaluation of the other alternatives and widening may be needed to maintain the 0.90 threshold. Transportation mitigation measures are described in section in 3.2.3.

TRAFFIC SAFETY

Traffic generated by Alternative 3 could result in a proportionate increase in the probability of collisions. However, like Alternative 2, Alternative 3 incorporates street design features to address existing safety issues. Traffic safety impacts for Alternative 3 are anticipated to be similar to Alternative 2. This alternative would elevate SR 530 so safety issues related to flood would be eliminated.

3.2.3 Mitigation Strategies

This section presents mitigation measures that would offset or reduce potential transportation impacts of the Alternatives. Mitigation measures include physical improvements to intersections and roadways to facilitate vehicular traffic.

Potential Policy Changes

Consideration could also be given to changes to the jurisdictions LOS policy and/or v/c ratio threshold. Increasing capacity at intersections and along the roadway system may improve LOS for vehicles; however, it could create impacts for other modes. The City and/or WSDOT 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. For example, a v/c ratio over 0.90 and/or a LOS standard of D instead of C may be considered acceptable allowing for a single-lane roundabouts to accommodate growth in the Island Crossing Subarea.

Intersection and Roadway Improvements

Based on the identified impacts under the Alternatives, SR 530 within the Subaera should be improved and intersection improvements are recommended at key intersections along the SR 530 and Smokey Point Boulevard corridors. Arlington's TMP identified improvements at the study intersections that have been assumed as part of the analysis; however, funding is uncertain at the I-5/SR 530 interchange and additional improvements at the SR 530/Smokey Point Boulevard intersection are needed beyond those included in the traffic impact fee (TIF) program.

I-5/SR 530 INTERCHANGE

The analysis of the alternatives assumes roundabouts are constructed at the SR 530 interchange. The need for roundabouts was identified based on the evaluation completed for the City's TMP as well as a review of the affected environment. In addition, the analysis of alternatives identifies the potential for a v/c ratio greater than 0.90 in 2044 resulting in the need for the single-lane roundabout with an additional northbound right-turn lane at the I-5 northbound ramps to provide a v/c ratio less than 0.90. With the roundabout improvements and the right-turn lane, the interchange would meet the LOS C standard and have a v/c ratio of less than 0.90. Funding for the interchange improvements is uncertain, and this project is not included in the City's TIF program. Planning level cost estimates indicate that roundabout improvements at the ramp terminals without widening the underpass would be approximately \$14 million. Specific mitigation for the interchange would need to be coordinated with WSDOT and could include payment of an impact or proportional share fee or other agreed upon mitigation. The proportional share of the alternatives at the intersection is 2% for the No Action, 5% for Alternative 2 and 20% for Alternative 3.

SR 530 ROADWAY AND SR 530/SMOKEY POINT BLVD INTERSECTION IMPROVEMENTS

Alternatives 2 and 3 improve SR 530 including elevating the road and constructing a new culvert as part of mitigation for flood and safety. Additional detail on the SR 530 improvement is provided in the street improvement discussion under incorporated plan features. Improvements along SR 530 would need to be developed as one project to allow for elevating the road and constructing culvert; therefore, rather than frontage improvements along SR 530 with Alternatives 2 and 3, the city would collect proportional share fees to complete SR 530 improvements as a capital project.

Arlington's 6-Year TIP 2025-2030 includes construction of a roundabout at the SR 530/Smokey Point Boulevard intersection. Construction of the single-lane roundabout at the SR 530/Smokey Point Blvd intersection is included in the City's TIF. The analysis of the alternatives shows that for the No Action and Action Alternatives the v/c ratio would be greater than 0.90 and with Alternative 3 the SR 530/Smokey Point Blvd intersection would not meet the LOS C standard. The roundabout is being designed for potential expansion to two lanes along SR 530. With the expansion of the roundabout, the SR 530/Smokey Point Blvd intersection would operate at LOS A and have a v/c ratio of 0.51. There are no current funded projects that expand the SR 530/Smokey Point Boulevard proposed roundabout. Improvements will be needed at this intersection with or without Alternatives 2 and 3. To mitigate the impacts of the Alternatives, it is recommended that developments within the

study area contribute a percent proportionate share of identified transportation improvement projects.

PROPORTIONAL COST SHARE

Exhibit 3.2.3-1 provides a summary of the mitigation and the Alternatives pro-rata cost estimates. The pro-rata is calculated based on the net new Subarea trips and the total projected traffic at the intersections based on the alternative. Alternative 1, No Action, is not part of the proportional share cost since it would not implement the SR 530 improvements and it is assumed that the v/c threshold does not result in required improvements at the Smoke Point Blvd/SR 530 intersection.

Exhibit 3.2.3-1 Summary of Mitigation and Alternative Pro-Rata Cost

Percent Pro-Rata Share ¹ (Pro-Rata Cost in millions of \$) ²				
Improvement	Estimated Cost (2024 dollars)	Alt 1	Alt 2	Alt 3
Smokey Point Blvd/SR 530				
Expand to a two-lane roundabout. The city is currently designing and included in the TIF a one-lane roundabout that can be expanded.	\$6.73 million	NA	NA	20% (\$1.35)
SR 530 Improvements				
Improve SR 530 including elevating road, constructing new culvert, consolidating driveways and providing a cross-section of 12-foot shared use path on both sides a center landscape median, one through travel lane in each direction with right-turn lanes at access points.	\$20.38 million	NA	5% (\$1.02)	20% (\$4.08)
Construct single-lane roundabout along SR 530 to provide access and circulation.	\$6 million	NA	5% (\$0.30)	20% (\$1.20)
Total Costs		NA	\$1.32	\$6.63

Source: Transpo Group, 2025

Notes: NA = Not applicable to alternative.

1. Based on the overall growth in trip ends for the Subarea.
2. Percent Pro-Rata Share x Estimated Total Cost

The total proportional share of the mitigation improvement cost could be charged using a per trip fee. Considering the total cost of the Island Crossing development share and the new trips generated by the Subarea, the fee per trip would be between approximately \$2,300 and \$2,700 per new PM peak hour trip.

Incorporated Plan Features

STREET IMPROVEMENTS

The No Action Alternative includes frontage improvements following City and State design standards.

Alternatives 2 and 3 would incorporate the street design outlined in the Island Crossing Subarea Plan, 2025. Improvements along SR 530 would need to be developed as one project to incorporate elevating the road and constructing a culvert; therefore, rather than frontage improvements along SR 530 with Alternatives 2 and 3, the City would collect proportional share fees to complete SR 530 improvements as a capital project. The street design provides enhanced multimodal facilities to accommodate walking, biking, rolling and driving (including trucks and buses). The design increases capacity to accommodate expected growth in traffic and provides access to the adjacent properties.

The street design for SR 530 under Alternatives 2 and 3 consolidates the property access points to reduce the number of driveways along SR 530 and improve safety. Exhibit 3.2.2-5, presented in the impacts section, shows the street cross section. The cross section has a 12-foot shared use path on both sides of SR 530, a center landscape median, one through travel lane in each direction with right-turn lanes at access points. The center median restricts driveways along SR 530 to right-in/right-out movements to reduce conflicts and reduces speeds along the corridor to improve safety. Exhibit 3.2.2-6 illustrates the plan view for the SR 530 street design and shows a central roundabout between the I-5/SR 530 interchange and the Smokey Point Blvd/SR 530 intersection that allows for vehicles to turn and access businesses on both sides of the street. Midblock crossings that would include traffic control such as a rectangular rapid flashing beacon (RRFB) are also planned on SR 530 to improve pedestrian safety along the corridor and facilitate movement of pedestrians to businesses on both sides of the street. The improved pedestrian access will allow for visitors to park once and access multiple uses on foot rather than driving within Island Crossing. Proportional share cost related to SR 530 and the midblock roundabout are described in Exhibit 3.2.3-1.

TRANSPORTATION STRATEGIES

The City of Arlington Island Crossing Subarea Plan, 2025 includes transportation strategies to improve safety, comfort, connectivity and multimodal travel through and within the area. The strategies also help to encourage non-auto travel within Island Crossing to help reduce the traffic impacts related to vehicles. The strategies are described below.

SR 530 STREET DESIGN AND OTHER TRANSPORTATION IMPROVEMENTS

These strategies overlap with the mitigation measures described in the intersection improvements and incorporated plan features.

- T-1** Coordinating with WSDOT, design and construct SR 530 to:
 - a. Be consistent with the Complete Street Program and include shared use paths to support and encourage non-motorized travel and reduce vehicle miles traveled.
 - b. Ensure the design accommodates truck, farm equipment, and transit maneuvers.
 - c. Provide landscape and gateway features along SR 530 to improve the corridor appearance, enhance Island Crossing's identity as a gateway to Arlington and the surrounding region (e.g., protect views of Cascade Mountains), and manage storm water to the extent feasible.
- T-2** Work with WSDOT to design and construct improvements at the I-5/SR 530 interchange to accommodate growth and improve safety.
- T-3** Complete the design and construct the SR 530/Smokey Point Boulevard roundabout. Ensure the roundabout accommodates truck, bus, and farm equipment maneuvers.
- T-4** Design and construct a roundabout approximately midway between I-5 and Smokey Point Boulevard along SR 530 to facilitate circulation and non-motorized crossings within Island Crossing.
- T-5** Design and construct multimodal improvements along Smokey Point Boulevard between 200th Street NE and SR 530 to accommodate growth and support non-motorized travel.
- T-6** Incorporate Island Crossing intersection improvements along SR 530 and Smokey Point Boulevard into the City of Arlington traffic impact fee program or determine another cost sharing approach to assist with funding.

STREET DESIGN STANDARDS/INTER-SITE CONNECTIVITY

- T-7** Provide midblock crossings along SR 530 to improve walking, biking, and rolling connectivity within Island Crossing and across SR 530.
- T-8** Promote connectivity between parcels within Island Crossing to improve safety and circulation.
- T-9** Work with developers as part of permitting to include a multimodal connection between properties and facilitate walking, biking, rolling, and driving without needing to rely solely on SR 530. See Subarea Plan strategy LU-6 Inter-site Connectivity for conceptual locations of streets to be dedicated to the City for the City to construct and maintain.

BIKE PARKING

- T-10** Encourage measures or facilities in both private and public development that support alternate modes of transportation, such as showers/dressing rooms, lockers, and secure bike parking.

TRANSIT SUPPORT

- T-11** Explore opportunities with Community Transit to provide microtransit services to/from Island Crossing.
- T-12** Design and construct facilities such that opportunities for transit service are not precluded.

Regulations and Commitments

TRANSPORTATION IMPACT FEES

Mitigation will be collected in the form of transportation impact fees. The City of Arlington has a traffic impact fee (TIF) program. Impact fees will be determined at a project level when permit applications are filed. The following projects with the Island Crossing Subarea are included in the current TIF program:

- SR 530/Smokey Point Blvd intersection. Construction of a single-lane roundabout. This project is being coordinated with WSDOT, Stillaguamish Tribe, City of Arlington, Snohomish County. The project is part of the City of Arlington 6-Year Transportation Improvement Plan (TIP) 2025-2030.
- Smokey Point Boulevard/200th Street NE. Single-lane roundabout.
- Smokey Point Boulevard 200th Street NE to SR 530. Widen to a 3-lane facility including sidewalks.

- Smokey Point Boulevard 200th Street NE to SR 530. Provide a multi-use trail along Smokey Point Boulevard.

TRAFFIC MITIGATION AGREEMENTS

SR 530 also serves as a major regional route for Snohomish County. The Arlington travel demand model estimates about 40 to 50% of the growth at the study intersections would be related to travel from outside of the City of Arlington. Arlington has an interlocal agreement with Snohomish County related to mitigation of transportation impacts². Per the agreement, Arlington can determine transportation impacts of County developments in transportation service area (TSA) A on City streets including state highways. The City may request that County development contribute a proportionate share of programmed capacity improvements to mitigate impacts to City streets. Given the amount of growth outside the Subarea that is anticipated to impact the study area intersections, it is recommended that County development pay a proportional share towards the improvements identified in Exhibit 3.2.3-1. The amount paid should be calculated based on the current interlocal agreement and the fee per trip identified as part of the Final EIS.

COMPLETE STREET

Arlington Complete Streets Policy (November 2018) would need to be followed as part of the subarea development. The policy addresses the needs of all users of the transportation system. As noted previously, the City has identified Smokey Point Boulevard as critical to citywide non-motorized connectivity.

3.2.4 Significant Unavoidable Adverse Impacts

With implementation of the planned improvements in the study area and proposed mitigation measures, there would be no significant and unavoidable impacts related solely to the proposed alternatives.

² 1999 Agreement on Reciprocal Mitigation of Transportation Impacts accessed June 27, 2025
<https://snohomishcountywa.gov/DocumentCenter/View/6740/Arlington--1999-Agreement?bidId=>

3.2.5 Affected Environment

STILLAGUAMISH RIVER FLOODPLAIN

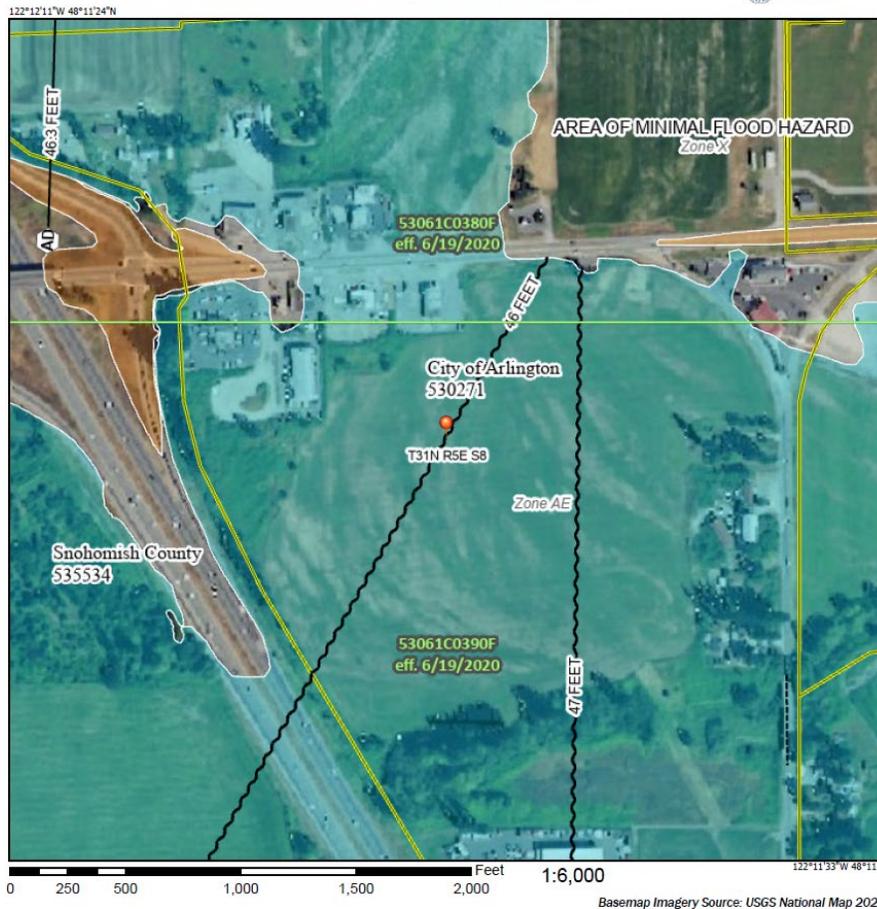
The subarea lies just south of the Stillaguamish River. Nearly the entire subarea is within the mapped 100-year floodplain of the river, the only exception being a small portion of high ground at the northeast corner of the subarea and the approaches to the State Route (SR) 530 interchange to I-5 (Exhibit 3.3.1-1).

In addition to nearly the entire area being within the 100-year floodplain, smaller flood events from the Stillaguamish River routinely inundate portions of the subarea (Exhibit 3.3.1-2), though it is outside the floodway. In particular, a swale extends through the middle of the subarea from north to south in the northern half of the subarea. Water from the swale is conveyed across State Route (SR) 530 where the swale intersects the roadway. A culvert at this location is intended to carry flood water from the Stillaguamish River under SR 530. However, the culvert is undersized and frequently plugs, as it did in December 2023, causing floodwaters to flow over the roadway (Exhibit 3.3.1-2). When the culvert is operating, flow is delivered to a series of stormwater facilities, which function both stormwater and flood compensatory functions, south of SR 530 and described in the next section.

Flooding during modest flood events sometimes results in inundation of existing development and pollutant generating surfaces, including flow over SR 530. It is also a significant human health hazard to the driving public on SR 530 (Exhibit 3.3.1-2) due to fast-flowing water over the roadway. The uncontrolled inundation in developed areas is also an ongoing impact to the fisheries in the Stillaguamish River (see next section for details). The inundation of developed areas also impacts water quality. Finally, it also impacts economic activity, as flooding can damage low-lying structures throughout the subarea, triggering closure of businesses, even for floods smaller than the 100-year event.

In addition to floodwater entering the subarea directly from the river to the north, floodwater further upstream on the Stillaguamish River enters both South Slough and Portage Creek, overwhelming these streams. The flooding from the north and these streams is generally separate except during the largest (100-year event and larger) events. During flood events, both South Slough and Portage Creek swell with this influx of water from upstream and overtop their banks flooding surrounding low-lying land in the southern portion of the subarea.

Exhibit 3.3.1-1 FEMA 100-year floodplain
National Flood Hazard Layer FIRMette



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS	Without Base Flood Elevation (BFE) Zone A, V, A99
	With BFE or Depth Zone AE, AO, AH, VE, AR
	Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD	0.2% Annual chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
	Future conditions 1% Annual chance Flood Hazard Zone X
	Area with Reduced Flood Risk due to Levee. See Notes, Zone X
	Area with Flood Risk due to Levee Zone D
OTHER AREAS	Area of Minimal Flood Hazard Zone X
	Effective LOMRs
	Area of undetermined Flood Hazard Zone D
GENERAL STRUCTURES	channel, culvert, or Storm Sewer
	Levee, Dike, or Floodwall
OTHER FEATURES	Cross Sections with 1% Annual chance Water Surface Elevation
	Coastal Transect
	Base Flood Elevation Line (BFE)
	Limit of Study
	Jurisdiction Boundary
	Coastal Transect Baseline
	Profile Baseline
	Hydrographic Feature
MAP PANELS	Digital Data Available
	No Digital Data Available
	Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 6/17/2025 at 9:42 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Source: FEMA, 2025

Exhibit 3.3.1-2 Flooding across SR 530 in December 2023



Source: Don Vanney, 2023

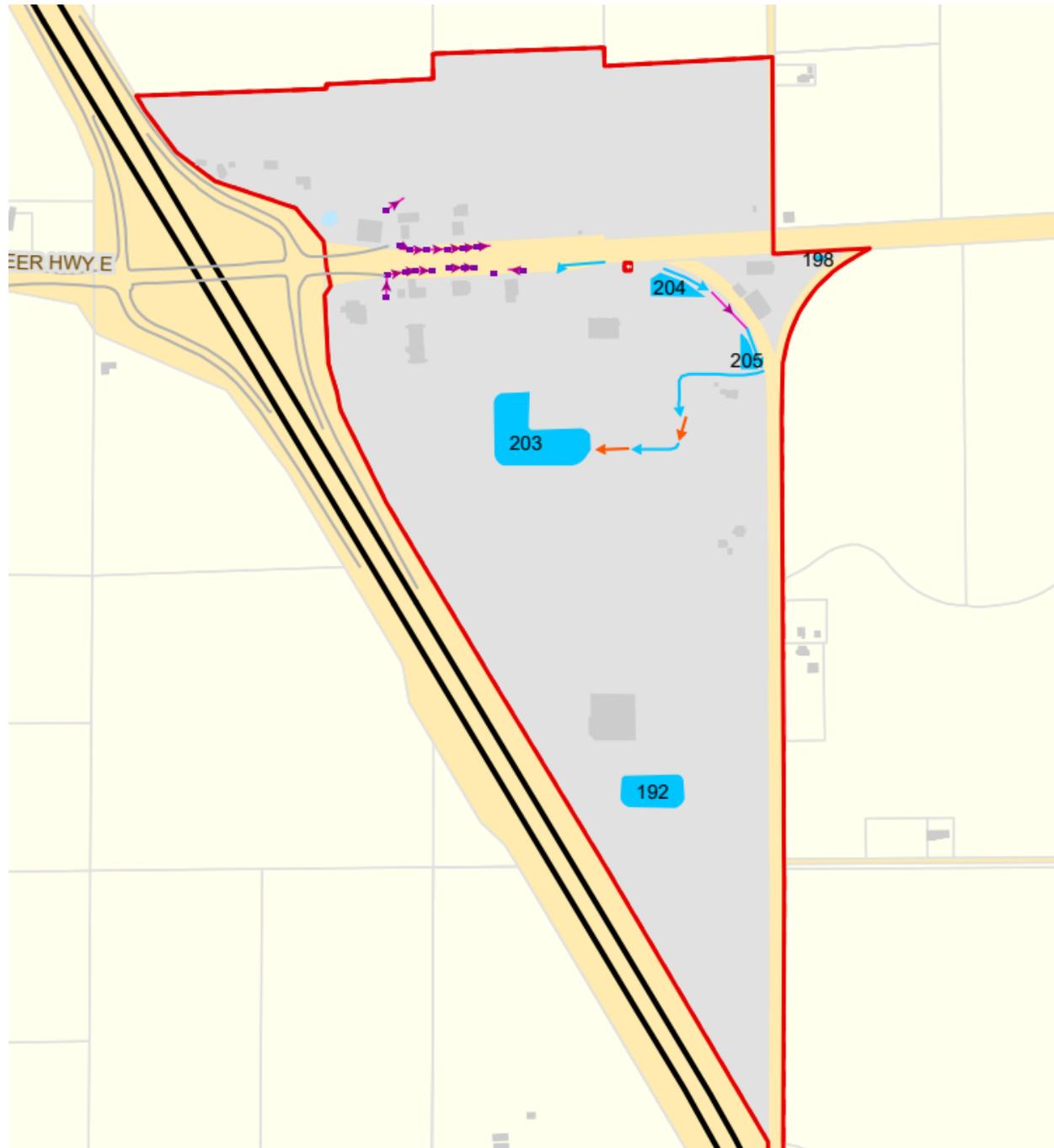
SURFACE WATER

Most surface water in the northern half of the subarea is routed through a series of constructed ditches to a series of stormwater facilities constructed to support the Pilot Truck Stop (Exhibit 3.3.1-3). This flow is complicated by the introduction of Stillaguamish River floodwater when flood events occur. The subarea includes a culvert crossing at SR 530. There are several other smaller stormwater facilities scattered just south of SR 530 and in the eastern part of the subarea.

In the southern portion of the subarea, near South Slough and Portage Creek, there is very little formal stormwater infrastructure (Exhibit 3.3.1-3).

When the Stillaguamish River is flooding, water flow from the river through the subarea is much larger than runoff. The flow is driven from the two primary sources of Stillaguamish overbank flow: 1) local overbank that arrives from the north primarily through the low-lying swale that bisects the subarea (discussed above in previous subsection), 2) flow via South Slough and Portage Creek from overbank much further upstream (east of) the subarea. The local overbank flow primarily flows north to south, whereas South Slough and Portage Creek flows primarily from east to west.

Exhibit 3.3.1-3 City of Arlington Stormwater Facility Map



Source: [City of Arlington, 2025]

GROUNDWATER

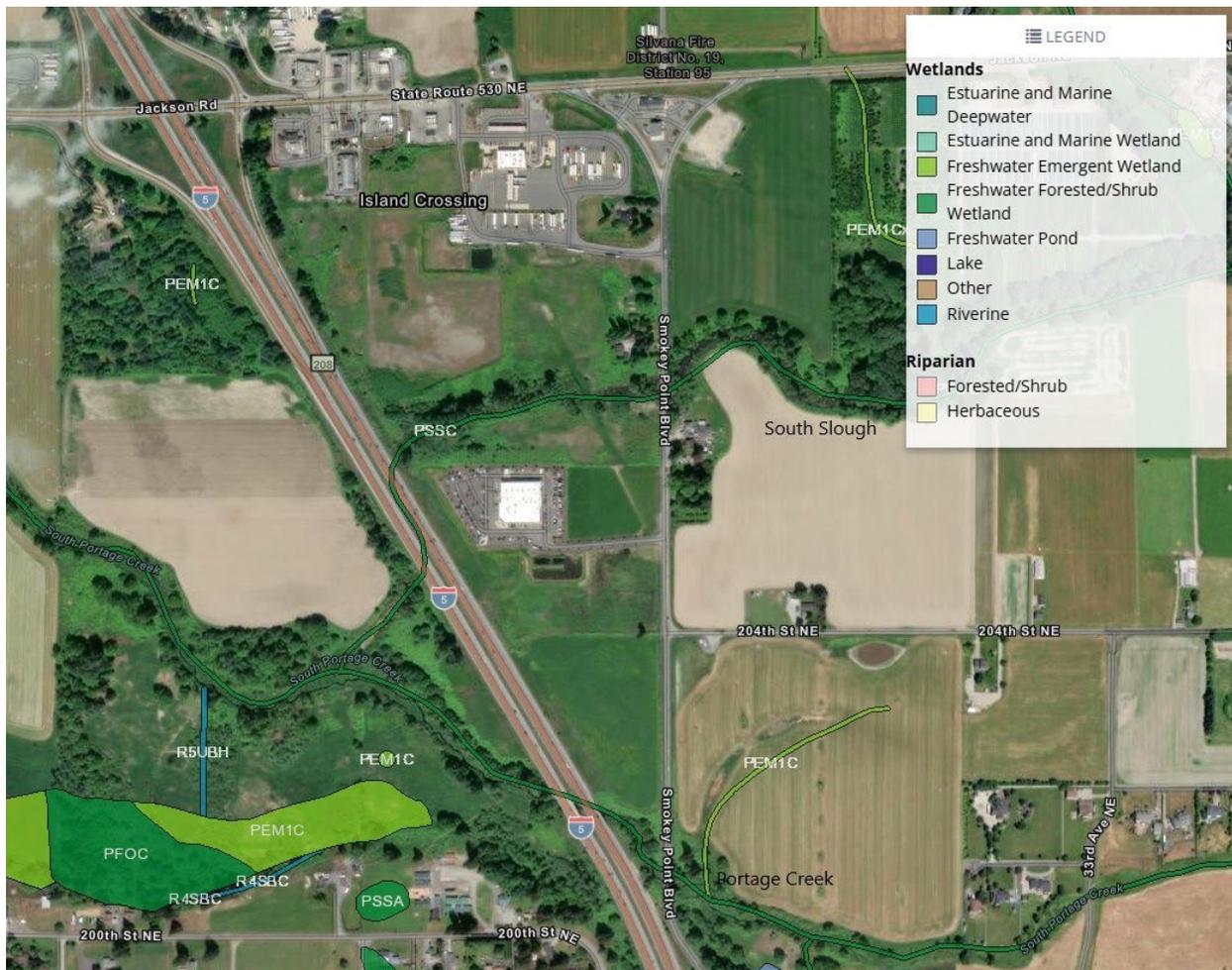
Groundwater throughout the subarea is closely connected to the water levels present in the Stillaguamish River. As a result, the groundwater table is close to the ground surface

throughout the subarea. In some places in the subarea ground level elevation has been increased by the addition of fill material, increasing the separation of the groundwater table from the land surface.

WETLANDS

The only mapped wetlands in the National Wetland Inventory (NWI) are those associated with South Slough and Portage Creek (NWI 2025, Exhibit 3.3.1-4). However, the hydrology of the area is such that ponded water is common, particularly through the swales (natural and constructed) that are located throughout the subarea. These features typically have wetland characteristics with standing water from both local runoff and Stillaguamish River inputs frequently throughout the year.

Exhibit 3.3.1-4 National Wetlands Inventory Map of the Subarea



Source: NWI, 2025

3.3 Water

3.3.1 Potential Impacts

Impacts Common to All Alternatives

Climate change will impact all the alternatives. The Stillaguamish River is an unmanaged (i.e., lacks flood-control dams) river; therefore, it is the subject to precipitation changes associated with climate change (Tohver et al. 2013). As described in numerous scientific publications regarding climate change, including Tohver et al. (2013), this will mean larger, more frequent flood events in the fall and winter and lower flows during the dry summertime.

The Stillaguamish River, as a river delta in this area, will also aggrade (sediment will be deposited) over time, slowly raising the river bed. This will increase out-of-bank flow during flood events, regardless of changes to the hydrology of the river itself and may be exacerbated by sea level rise.

Ongoing hydrologic changes caused by existing development will also continue. In particular, SR 530 hydrologically separates the northern portion of the subarea from the southern portion during non-flood flows. I-5 will also continue to focus Stillaguamish River floodwater through existing crossings on the mainstem Stillaguamish River, South Slough, and Portage Creek. Heightened runoff from existing impervious surfaces will continue in all the alternatives.

STILLAGUAMISH RIVER FLOODPLAIN

More frequent large flood events in the Stillaguamish River are expected to occur in the future. Flooding intensity and frequency will be exacerbated by ongoing sedimentation in the lower Stillaguamish River, triggering out-of-bank flow more regularly than has occurred in the past.

South Slough and Portage Creek are less understood. Their inputs are a combination of local runoff, groundwater, and residual overtopping and flooding from the Stillaguamish River. As a result, high/flood flows will likely increase, but the magnitude of that increase is highly uncertain since it is dependent on development outside of the City and geomorphic changes in the river itself.

SURFACE WATER

More intense precipitation events are expected as a result of climate change. These increases may overwhelm existing stormwater infrastructure and trigger local inundation on some existing developed parcels that were developed prior to modern stormwater regulations.

GROUNDWATER

On average, groundwater levels are expected to increase throughout the subarea over time, primarily because of aggradation in the Stillaguamish River, raising the bed of the river and therefore the groundwater table. Seasonal variation is also expected to increase with higher groundwater levels in the winter than current conditions, while summer lows may be lower than historical levels due to decreased summer precipitation. These variations are included in an overall increase in average annual levels.

WETLANDS

Impacts to wetlands or their regulatory buffers as defined by the Arlington code, may require permits and compensatory mitigation from the City of Arlington, the Washington Department of Ecology (Ecology), and the U.S. Army Corps of Engineers (USACE). See section 3.3.3 for an overview of applicable regulations.

Under all alternatives, some degree of wetland loss may occur due to development activities, including grading, filling, and construction within or near jurisdictional areas. While mitigation would be required, the loss or degradation of these aquatic resources could reduce the overall water storage capabilities and water quality within the subarea.

It is unclear what changes will occur to wetlands from climate change. Wetland areas are expected to be wetter in the fall and winter and drier in the summer. Ongoing degradation from water quality impacts from SR 530 and other pollutant generating surfaces is expected.

Alternative 1: No Action

STILLAGUAMISH RIVER FLOODPLAIN

As in existing conditions, flooding will impact the subarea. These impacts will continue to occur and likely increase over time as flow increases in the Stillaguamish River, increasing flooding inundation and frequency. Flooding will also likely increase due to aggradation in the river channel itself. This means that flood waters will overtop SR 530 more frequently. As a result, businesses will be flooded more often and to greater depth. Exposure to additional pollutant generating surfaces will decrease water quality of the flood water over time. It will

also continue to endanger traffic on SR 530 during flood events. Flooding may increase to the point where existing low-lying development becomes economically infeasible.

SURFACE WATER

Surface water will continue to be routed as it is now. The primary system south of SR 530 is generally oversized for local heavy rain events, even accounting for precipitation increases due to climate change. Although built to accommodate some unknown amount of Stillaguamish River input, it is often not engaged properly due to the frequent blockage of the SR 530 culvert. The culvert, already poorly performing, is expected to continue to degrade, increasing overtopping of the roadway over time, regardless of flood input changes.

On-site stormwater storage would be required for any new development, however increased Stillaguamish flooding would make adequate drainage runoff management challenging. It is likely that regulatory and site constraints will discourage new development.

GROUNDWATER

Average annual groundwater level increases would be modest under this alternative. It is unclear whether the groundwater elevation increases associated with Stillaguamish River aggradation will have significant impacts on the resources in the area, or the performance of existing stormwater infrastructure.

WETLANDS

Wetlands could expand on those parcels incapable of being developed, partly due to increased flood inundation and rising groundwater levels. These wetlands may be disturbed by past fills and land uses, fragmented due to surrounding development, and provide minimal ecological connectivity in terms of habitat, hydrologic, and water quality functions. However, development may increase their value in maintaining the baseline hydrologic and water quality functions in the subarea.

Alternative 2: Subarea Plan Partial Implementation

STILLAGUAMISH RIVER FLOODPLAIN

Improvements to SR 530 will eliminate routine overtopping of SR 530 by raising the roadway and improving conveyance across it by expanding the culvert. This will better engage the large stormwater system on the south side of SR 530. The improvements might not eliminate all overtopping, since portions of the highway mostly outside of the City's jurisdiction might remain below the 100-year water surface elevation, but the risks to the driving public would

be reduced compared to existing conditions and Alternative 1. These improvements will also improve water quality when flooding occurs.

The lack of a new regional compensatory floodwater/stormwater storage facility means that flooding will likely continue to impact existing businesses, but flooding will be reduced compared to Alternative 1 and existing conditions due to the improved culvert, particularly on the north side of SR 530 where impoundment (i.e., water collecting on the upstream/north side) on the highway prism is common.

There will be very little impact to the southern portion of the subarea since it is hydrologically distinct from the SR 530 improvement area.

On-site flood storage or elevation of structures would be required for any new development (in addition to the stormwater storage discussed below). Such measures are expensive and may not be feasible in all cases. It is likely that these constraints will dissuade new development from being constructed

SURFACE WATER

With improvements to the SR 530 culvert, the primary stormwater facility south of Pilot serving the SR 530 area will see increased use as both a stormwater facility and compensatory flood storage facility. However, over time the increases in flood magnitude and frequency, both from existing and increased out-of-bank flow, may eventually overwhelm the facility. It is unclear what impact if any this would have on adjacent development.

On-site floodwater/stormwater storage would be required for any new development (in addition to the compensatory floodwater storage discussed above), but it would be complicated by the inability or expense to meet regulatory requirements for stormwater management. It is likely that these constraints will dissuade new development from being constructed.

Water quality will be improved due to reduced SR 530 overtopping and associated contamination. Somewhat lower flood elevations on the north side of SR 530 (due to improved culvert to the southside facility) may facilitate better function of local stormwater facilities on this side of the highway. Lower flood elevations in developed areas will also reduce flood damage to existing development, though it will not eliminate it. Otherwise, drainage patterns during non-flood events are unlikely to change significantly.

GROUNDWATER

No significant additional stormwater storage capacity will be added in this alternative compared to Alternative 1, so there will not be an increase in recharge. Like Alternative 1,

groundwater changes would be modest. It is unclear whether the groundwater elevation increases associated with Stillaguamish River aggradation will have significant impacts on the resources in the area, or the performance of existing stormwater infrastructure.

WETLANDS

Changes to wetland hydrology would generally be modest and similar to Alternative 1, at least on those properties that remain undeveloped. Wetlands could expand on those parcels incapable of being developed, partly due to increased flood inundation and rising groundwater levels. These wetlands may be disturbed by past fills and land uses, fragmented due to surrounding development, and provide minimal ecological connectivity in terms of habitat, hydrologic, and water quality functions. However, development may increase their value in maintaining the baseline hydrologic and water quality functions in the subarea.

Alternative 3: Subarea Plan Full Implementation

STILLAGUAMISH RIVER FLOODPLAIN

Full implementation of the Subarea Plan will reduce flooding on existing developed properties throughout the northern half of the subarea by storing floodwater and better conveying it across SR 530. It will likely not significantly impact the southernmost end of the subarea, since these southern areas are generally hydrologically disconnected from northern-originated flooding during most flood events. It will also significantly reduce risk to the driving public on SR 530. It may be sufficient to eliminate all overtopping of SR 530 (unlike the other alternatives). It also will be more able to accommodate the increasing flooding due to climate change. Finally, it will improve water quality of floodwater, which would also likely have habitat benefits (discussed in detail in the next section).

SURFACE WATER

During non-flood precipitation events the new regional floodwater/stormwater storage facility will address all the runoff treatment in the subarea, regardless of the expected increased development. The improvements will improve groundwater recharge and likely wetland function.

The regional floodwater/stormwater facility will assist the management of Stillaguamish River floodwater. It will reduce impact of heightened flooding on the existing stormwater network south of SR 530. It will reduce flood elevations in developed portions of the subarea, increasing the feasibility of new development and reducing flood exposure of existing properties. The facility will improve water quality by more efficiently addressing runoff and floodwater as required by current regulatory requirements.

GROUNDWATER

Groundwater recharge would increase in this alternative and may raise the groundwater water slightly and locally, assuming that the design can accommodate rising annual average groundwater levels over time. The floodwater/stormwater facility and associated infrastructure would likely cause total infiltration to increase during flood events. This increased recharge would store more floodwater underground and mediate the larger seasonal variations expected to occur due to climate change.

WETLANDS

The proposed regional floodwater/stormwater facility will likely have a wetland component. Although it is likely that some of the facility area is already a wetland, the facility would likely incorporate wetland features and include greater wetland areas than currently exist north of SR 530. These would be enhanced over time by a rising groundwater table. More formal connection to the Stillaguamish River would further enhance the function of the wetlands.

3.3.2 Mitigation Strategies

Incorporated Plan Features

All alternatives will incorporate applicable regulations and require compensatory mitigation for new development to minimize impacts on wetlands, streams, floodplain function and water quality as described in the Regulations and Commitments section. As part of the draft Subarea Plan in Alternative 3, mitigation measures include identifying and supporting multi-purpose compensatory floodwater storage areas, such as floodable organic agricultural or recreational lands, to reduce flooding impacts on SR 530 and adjacent properties while improving water quality, reducing damage to infrastructure from flooding, enhancing habitat connectivity, and maintaining ecological function.

Alternatives 2 and 3 will be aligned with the current Stormwater Management Manual for Western Washington (SMMWW), as revised. The ICSM will also coordinate all stormwater treatment in the subarea, both existing and future development. All future development in Alternative 1 will also have to meet the requirements of SMMWW, though it will be implemented on a piecemeal basis – and not for the entire subarea (i.e., not for those areas that have existing development and it will not be coordinated across the subarea).

530 LANDSCAPING

Landscaping along SR 530 will incorporate green stormwater infrastructure (GSI) features, slowing stormwater flows.

Regulations and commitments

Exhibit 3.3.3-1 includes a list of regulations and commitments related to water quality and flooding for development actions. A more detailed list is provided in the Natural Environment section that addresses other natural resources concerns. Existing regulations requiring mitigation of impacts to water resources would continue to apply under all alternatives.

Exhibit 3.3.3-1 Federal, State and Local Laws, Plans and Policies.

REGULATORY PROGRAM OR POLICIES	LEAD AGENCY	DESCRIPTION
Clean Water Act Section 404 - 33 USC 1251-1387 (CWA)	U.S. Army Corps of Engineers	The CWA is the primary federal law governing water pollution and fill with the objective to restore and maintain the chemical, physical, and biological integrity of the nation's waters.
Hydraulic Code RCW Chapter 77.55	Washington Department of Fish and Wildlife	Work that affects the flow or bed of freshwater or marine waters, including areas above the bank, requires an hydraulic project approval (HPA). WDFW issues general HPAs for routine maintenance and preservation activities. This may include any number of the swales, ditches and side channels in the subarea.
Arlington Municipal Code (AMC) Chapter 20.93 Critical Areas Ordinance	City of Arlington	Arlington regulates trees, fish and wildlife habitat conservation areas, wetlands, and other critical areas under Chapter 20.93 of AMC. The also City regulates shoreline use, development, and ecological protection through its Shoreline Master Program, adopted under the Shoreline Management Act.
State Environmental Policy Act (SEPA)	City of Arlington	SEPA identifies and analyzes environmental impacts associated with governmental decisions. SEPA can be used to modify or deny a proposal to avoid, reduce, or compensate for probable impacts.
Arlington Municipal Code Chapter 20.64 Floodplain Development Regulations	City of Arlington	Most of the subarea is within the FEMA 100-year floodplain (Exhibit 3.3.1-1) and is therefore regulated by Chapter 20.64. Any new development within the 100-year floodplain, in whole or in part, would be required to obtain a flood hazard permit, as described in Section 20.64.125. This will likely entail significant documentation of how flooding will be addressed by the development.
Arlington Municipal Code Chapter 13.28 Stormwater Utility	City of Arlington	Any new construction in any of the alternatives would have to comply with Section 13.28.210, which requires a Construction Drainage Permit. This document may have to be combined with Flood Hazard Permit mentioned in the row above.

Other Potential Mitigation Measures

The City of Arlington has an opportunity to protect City water quality from additional impacts by providing space for floodwaters and separating developed uses from common flow pathways. Specific actions could include:

- Encouraging restoration of degraded critical areas and buffers to support slowing of flow, water storage, and infiltration.
- Working with neighboring jurisdictions to restore floodplain areas to slow flow from the Stillaguamish River and reduce flood water surface elevations.
- Implementing opportunities to use stormwater facilities and green stormwater infrastructure beyond the regulatory requirements that can improve groundwater recharge and surface water quality.
- Encourage infiltration of runoff as a part of new development where feasible to improve and provide storage volume during extreme events.
- Planning for climate resilience of natural areas, using a regional landscape-scale approach.

3.3.3 Significant Unavoidable Adverse Impacts

In Alternative 1, there remains significant and increasing flood impacts associated with unregulated flooding and piecemeal stormwater and flood management for existing and new development. These impacts are not only to the natural environment but produce unsafe conditions for the driving public and users of the low-lying development in the area. They also degrade water quality through piecemeal stormwater management and unregulated flooding.

3.4 Natural Environment

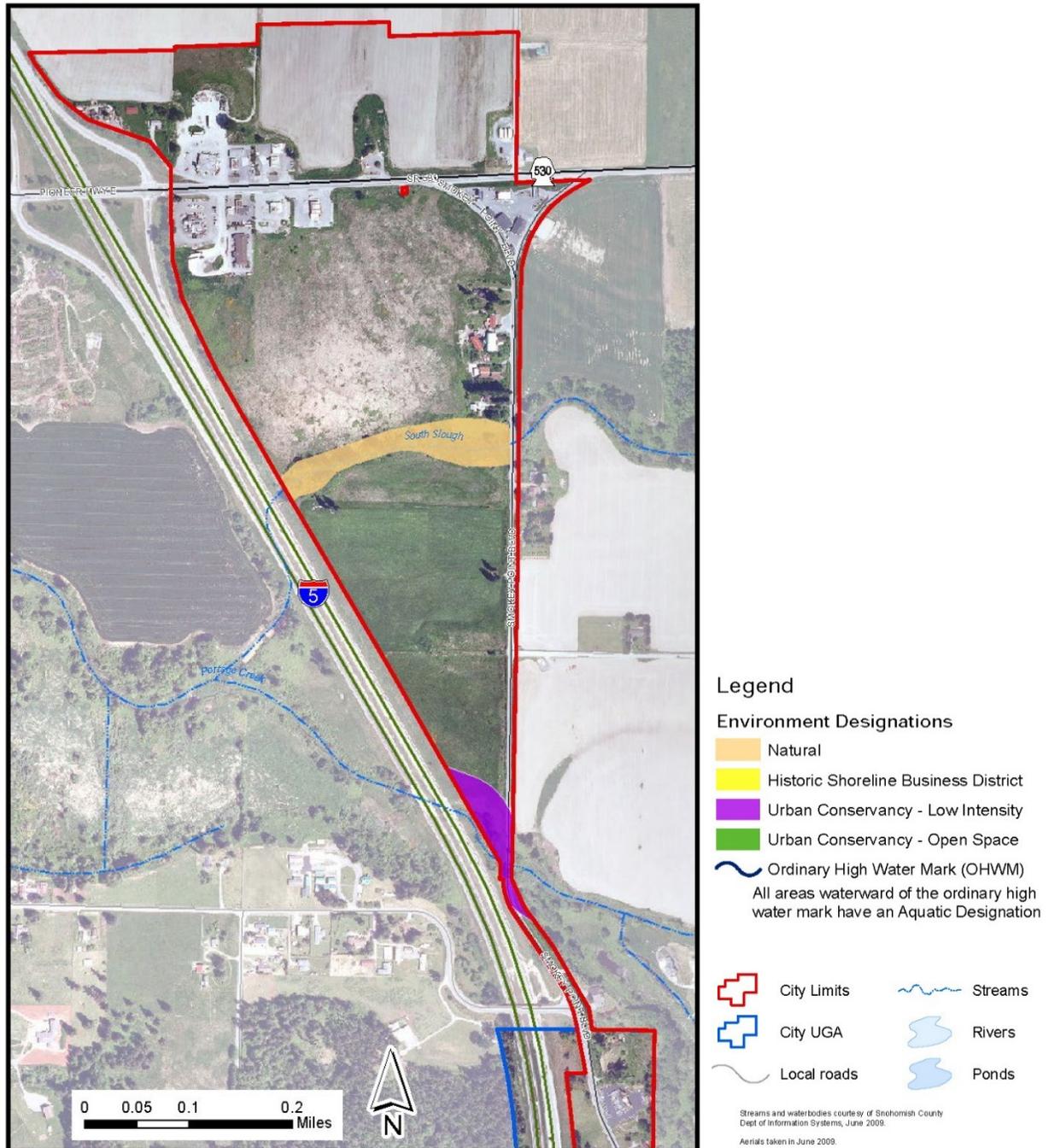
3.4.1 Affected Environment

SEPA elements of the Natural Environment include streams, wetlands, terrestrial habitat, and priority habitats that support species listed by state or federal agencies as endangered, threatened, sensitive, or of local importance. Mapped habitat areas are primarily identified using the Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species (PHS) data, the Statewide Washington Integrated Fish Distribution (SWIFD) dataset, and the National Wetlands Inventory (NWI), supplemented by aerial imagery review and field observations.

STREAM, RIPARIAN, AND WETLAND HABITAT

Within the subarea, South Slough and Portage Creek are both designated as Type S, fish-bearing Streams (Exhibit 3.4.1-1). Based on WDFW and WSDOT fish passage inventories, all mapped culverts in the subarea are currently passable to fish (WDFW 2025a). Documented fish use and federal and Endangered Species Act (ESA) status is summarized in Exhibit 3.4.1-2 (WDFW, 2025b, 2025c; NWIFC, 2025). In addition, Portage Creek is designated critical habitat for the Puget Sound Distinct Population Segment of Steelhead trout in accordance with the ESA (NOAA Fisheries, 2025).

Exhibit 3.4.1-1 National Wetlands Inventory Map of the Subarea



Source: City of Arlington, 2019

Exhibit 3.4.1-2 Fish Use of South Slough and Portage Creek.

Species	Scientific Name	Federal Status	South Slough Documented Use	Portage Creek Documented Use
Chum	<i>Oncorhynchus keta</i>	None	Gradient accessible	Gradient accessible
Chinook	<i>O. tshawytscha</i>	Threatened	Documented	Gradient accessible
Coho	<i>O. kisutch</i>	None	Gradient accessible	Documented rearing
Pink	<i>O. gorbuscha</i>	None	Gradient accessible	Gradient accessible
Sockeye	<i>O. nerka</i>	None	Documented	None
Steelhead	<i>O. mykiss</i>	Threatened	Gradient accessible	Documented rearing
Coastal cutthroat	<i>O. clarkii</i>	None	Documented	Documented
Bull trout	<i>Salvelinus confluentus</i>	Threatened	None	Presumed

Table Note: "Gradient accessible" means the stream is passable for salmon, and while none have been documented, they may still reach the area.

Source: WDFW, 2025b, 2025c; NWIFC, 2025

Both streams lie within the 100-year floodplain of the Stillaguamish River and within the subarea. They are designated under the City of Arlington Shoreline Master Program as follows:

- South Slough: Natural. This designation prioritizes long-term ecological functions with limited development.
- Portage Creek: Urban Conservancy – Low Intensity. This designation allows low-density development while maintaining shoreline ecological functions.

In accordance with the Shoreline Master Program, a 150-foot buffer is required for all regulated activities adjacent to fish and wildlife habitat conservation areas that support ESA-listed fish species (City of Arlington, 2019). The buffer consists of:

- A 100-foot inner zone where no human activity is permitted except specific approved uses (see SMP.430); and
- A 50-foot outer management zone where vegetation may be modified only for public health and safety concerns.

However, buffer widths may be increased on a case-by-case basis when needed to protect critical area functions as described in Chapter 20.93.

Instream habitat in both watercourses is low gradient and generally low in complexity with minimal large woody debris. The streams interact with the surrounding floodplains and wetlands and therefore provide some flood flow refugia for fish. However, large flood events

can lead to fish stranding (i.e. trapped in places where they can't get back to the main channel). This stranding may occur for fish coming from the South Slough and Portage Creek systems as well as from the Stillaguamish River directly. Instream shading from riparian vegetation is variable. At South Slough the riparian canopy is primarily deciduous including black cottonwood, red alder, and willows. Common invasive species include Himalayan blackberry and reed canarygrass are also prevalent. At Portage Creek the riparian vegetation community is similar but incorporates some small conifers such as western red cedar in some reaches.

The National Wetlands Inventory (NWI) identifies riverine wetlands associated with both streams in the study area (USFWS, 2025a). No other wetlands are mapped in the study area, however review of aerial imagery indicates the likely presence of seasonal depressional wetlands in undeveloped or agricultural portions of the subarea. These wetlands appear disturbed, often lacking native vegetation and habitat complexity. However, they may still offer functional habitat to birds (e.g. foraging and loafing habitat for swans) and other species accustomed to human activity.

Floodplain functions, including in Island Crossing, are of high importance to ESA-listed Chinook salmon. The Stillaguamish Watershed Chinook Salmon Recovery Plan identifies lower Stillaguamish River floodplain as a priority for floodplain restoration (Stillaguamish Implementation Review Committee, 2005). Unconstrained floodplains provide important off-channel refuge habitat during high flows, support nutrient cycling, filter floodwaters, and deposit fine sediment essential to aquatic food webs.

TERRESTRIAL HABITAT

Upland areas within the study area are visibly disturbed and characterized by weedy, non-native or naturalized vegetation, such as Himalayan blackberry and other noxious weeds. While these terrestrial areas may offer limited habitat functions, they are generally considered to have low habitat value due to the prevalence of invasive species and lack of native plant diversity.

HABITAT CONNECTIVITY

Habitat connectivity is essential for maintaining healthy wildlife populations, allowing animals to move freely across the landscape to access food, water, shelter, and breeding habitat. In areas fragmented by major highways and roads, connectivity is often severely reduced, leading to isolated populations, increased wildlife-vehicle collisions, and limited genetic exchange (Forman and Alexander, 1998).

In the study area, most terrestrial connectivity occurs in relatively undeveloped areas, where natural habitats remain contiguous and are not interrupted by dense development. In

addition, bridges and elevated roadways play a key role in facilitating wildlife movement by allowing animals to pass beneath highways and major roads, which helps to maintain healthy breeding populations. These underpasses can be especially important near riparian corridors, floodplains, and wetlands, where wildlife tends to concentrate. Preserving and enhancing these landscape linkages is important to reducing the barrier effects of road infrastructure and supporting regional biodiversity (Morrison and Matthewson, 2015; Dramstad et al., 1996).

The Portage Creek Wildlife Area, located upstream of the subarea, about 1.3 miles to the east, as well as the forested riparian corridor associated with the Stillaguamish River provides additional protected habitat and ecological connectivity. While located outside of the subarea, these resources emphasize the regional importance of the study area for providing habitat connectivity in the landscape.

PRIORITY HABITATS AND SPECIES

WDFW defines priority habitats as habitats with elements unique or significant value to a large number of species (WDFW, 2021). A priority habitat may consist of a unique vegetation type or a specific habitat feature. Priority habitats in the subarea include riparian areas, instream habitats, freshwater wetlands, and potentially forested areas rich in snags and logs (WDFW, 2025c). In the subarea, as with much of Western Washington, development has significantly altered habitat conditions from the historical condition. However, undeveloped areas in the subarea, such as the riparian and wetland areas retain some valuable habitat functions. Notably, WDFW mapping indicates that agricultural fields north of SR 530 support regular concentrations of swans, which is considered a Priority Habitat requiring protection under Arlington's critical area and SMP regulations (WDFW, 2025c).

ESA listed wildlife species potentially occurring in or near the subarea and their listing statuses are provided in Exhibit 3.4.1-3. Due to the specific and often narrow habitat requirements of the listed species, combined with the high levels of existing disturbance within the study area, it is unlikely that these species occur in the project vicinity.

Exhibit 3.4.1-3 Mapped ESA Wildlife Species.

Species	Scientific Name	Federal Status
Marbled murrelet	<i>Brachyramphus marmoratus</i>	Threatened
Yellow-billed cuckoo	<i>Coccyzus americanus</i>	Threatened
Northwestern pond turtle	<i>Actinemys marmorata</i>	Threatened
Monarch butterfly	<i>Danaus plexippus</i>	Proposed Threatened
Suckley's cuckoo bumble bee	<i>Bombus suckleyi</i>	Proposed Endangered

Table note: ESA fish species are noted in Exhibit 3.4.1-2.

Source: USFWS, 2025b

South Portage Creek is mapped as designated critical habitat for steelhead [Puget Sound DPS], specifically for juvenile rearing (NOAA Fisheries, 2025). No other designated critical habitats are located within the subarea.

3.4.2 Potential Impacts

This section evaluates the potential ecological impacts of each alternative, focusing on how changes in land use, development intensity, and infrastructure may affect habitat quality, connectivity, and species of concern. Because certain topics (e.g. wetland loss or edge effects) are not equally relevant to all alternatives, not every topic is addressed under each alternative. Instead, the analysis emphasizes the most applicable impacts based on the nature and extent of development proposed in each alternative.

Impacts Common to All Alternatives

STREAM, RIPARIAN, AND WETLAND HABITAT

Under all alternatives, wetlands may expand as rising groundwater and increased flooding from river aggradation raises the water table and inundates adjacent low-lying areas.

Impacts to wetlands or their regulatory buffers as defined by the Arlington code, may require permits and compensatory mitigation from the City of Arlington, the Washington Department of Ecology (Ecology), and the U.S. Army Corps of Engineers (USACE). See section 3.4.3 for an overview of applicable regulations.

Under all alternatives, some degree of wetland and stream loss may occur due to development activities, including grading, filling, and construction within or near jurisdictional areas. While mitigation would be required, the loss or degradation of these aquatic resources could reduce habitat availability and ecological functions such as water filtration and flood attenuation as described in section 3.3, specifically within the subarea. This is because compensatory mitigation has a high likelihood of occurring out of the subarea due to the limited available space within the subarea.

Climate change will also cause impacts to wetlands. Wetland areas are expected to be wetter in the fall and winter and drier in the summer. This change could influence species that use the wetland habitat.

The degradation and fragmentation of floodplain habitat due to increased development would result in the loss of floodplain functions including off-channel refuge habitat for salmon during high flows, nutrient cycling, floodwaters filtration, and deposition of fine sediment essential to the aquatic food web.

TERRESTRIAL HABITAT

The transition zones between developed and natural areas can produce "edge effects," where habitat conditions at the margins differ from those in the interior (Dramstad et al. 1996; Haddad et al. 2015). These differences, such as greater human disturbance, noise pollution, artificial light, and introduced nonnative plants, can negatively impact sensitive species and ultimately reduce biodiversity (Forman and Alexander 1998). Increased development introduces more noise pollution from vehicles, machinery, and construction. Potential increases in traffic levels and duration, particularly around dawn and dusk, have the potential to increase wildlife and vehicle collisions. Lights associated with increased development may also increase light pollution which could negatively impact wildlife in natural areas. Development activities or associated landscaping may cause the introduction of nonnative plant species to increase which may be exacerbated by the increasing quantity of edge habitat.

In addition, under all alternatives, development intensities would increase throughout Western Washington, which would increase the impacts to plants and animals throughout the region and would therefore be considered a cumulative impact within the City.

HABITAT CONNECTIVITY

Increased land use intensity can lead to habitat fragmentation, breaking up large, contiguous perennially vegetated areas (i.e. riparian areas or low intensity agricultural areas which offer seasonal habitat to swans and other species) into smaller, isolated patches

(Dramstad et al. 1996; McKinney 2008; Fahrig 2003; Forman and Alexander 1998; Haddad et al. 2015). This fragmentation disrupts ecosystems, restricts species movement, and reduces genetic diversity within populations (Dramstad et al. 1996; Fahrig 2003; Forman and Alexander 1998; Haddad et al. 2015). The severity of these impacts depends on the location of new development, land use intensity, habitat patch size, landscape connectivity in terms of habitat, as well as the regulations put in place to protect these resources. While federal, state, and local protections for sensitive species and critical areas like wetlands will likely remain, increased development will still accelerate fragmentation and connectivity loss. In particular, roads and traffic associated with growth may act as barriers to wildlife movement, reducing habitat connectivity and increase mortality from collisions (Forman and Alexander 1998).

PRIORITY SPECIES AND HABITATS

Priority species and habitats are protected under Arlington code. Protections include buffer widths and construction timing, which should be identified in a site-specific Habitat Management Plan (HMP) prepared by a qualified biologist for any development proposals that may impact this habitat in accordance with Arlington code. See section 3.4.3 for an overview of applicable development regulations.

Higher land use densities often convert natural habitats into urban, industrial, or agricultural areas, leading to substantial loss of native vegetation and biodiversity, which can hinder species reproduction (McKinney 2008). While mitigation or minimization measures may be required to reduce impacts to protected species and habitats they may not fully compensate for the permanent loss of habitat structure, connectivity, and ecological function.

Alternative 1: No Action

HABITAT LOSS

Under the No Action Alternative, the lowest amount of new development would occur compared to the action alternatives. While development would still likely occur, there would be likely fewer direct impacts to fish and wildlife habitat conservation areas. Existing habitats such as streams, wetlands, and riparian corridors, would face less pressure from land conversion. Although disturbed areas dominated by invasive vegetation would remain of low habitat value, the overall degradation of sensitive habitats would be minimized, supporting continued ecological function and minimizing cumulative impacts within the City and region.

INDIRECT HABITAT IMPACTS

Indirect impacts from increased human activity, traffic, and light or noise pollution would be less severe compared to Alternatives 2 and 3. Lack of flow under SR 530 raises the risk of fish becoming stranded when water recedes after flood events. Habitat connectivity and ecological functions within riparian areas, wetlands, and adjacent uplands would generally remain unchanged under this alternative. While existing connectivity is limited in some areas and could benefit from targeted improvements, this alternative would introduce the fewest new barriers to wildlife movement through increasing traffic volumes. However, because it does not include any major infrastructure or land use changes, it also offers no opportunity, beyond what is already required through regulatory protections, to actively improve or enhance connectivity.

Alternative 2: Subarea Plan Partial Implementation

HABITAT LOSS

Under Alternative 2, areas of primarily low-quality undeveloped terrestrial vegetation are at risk of conversion to commercial development. While any conversion to hardened infrastructure would result in some habitat loss, the ecological value of these areas is comparatively low compared to wetland or riparian areas. However, new development may also encroach into nearby wetland, riparian, and priority habitats or their buffers.

Under Alternative 2 remaining habitat is more vulnerable to both hydrologic impacts and uncoordinated, piecemeal development because it is more likely that growth will encroach incrementally into sensitive areas without the benefit of integrated design elements, such as connectivity between wetlands and riparian buffers. Because compensatory mitigation may occur off-site, more direct habitat loss and degradation may occur within the subarea itself, reducing local ecological function and resilience. While new development and traffic levels would be higher than under Alternative 1 and lower than under Alternative 3, the absence of the large compensatory flood storage area proposed in Alternative 3 means that some of the most sensitive natural resources, such as wetlands, streams, and priority habitat for swans, could experience greater degradation under Alternative 2 because floodwaters would be more dispersed and more likely to end up in developed areas, as opposed to habitat-forming pools (as would occur in natural conditions).

INDIRECT HABITAT IMPACTS

There would be a reduction in the risk of fish stranding under Alternative 2 compared to the No Action Alternative because flow will be more intentionally directed to areas that are permanently wetted and undeveloped. This includes routing high flows toward riparian

corridors and areas that provide temporary refuge habitat such as connected ditches, which reduces the likelihood of fish becoming trapped or isolated in dewatering areas after peak flows recede. Alternative 2 would involve an increase in land use intensity, primarily through additional commercial development in areas that are already partially developed or disturbed by past land use. Habitat in these areas is generally limited and of low ecological function. The moderate increase in traffic would primarily occur along existing arterials, which are already established barriers to wildlife movement, and therefore would not significantly increase the extent of barrier effects. However, construction of and increased traffic on commercial driveways and private roads, particularly those near riparian corridors or undeveloped patches, may introduce new localized barriers or increase the severity of existing barriers which can increase wildlife-vehicle collisions, and further degrade adjacent habitat quality.

Alternative 3: Subarea Plan Full Implementation

HABITAT LOSS

Similar to Alternative 2, Alternative 3 would primarily allow the conversion of low-quality undeveloped terrestrial vegetation to developed commercial area. However, Alternative 3 would also include the construction of large compensatory flood storage areas, which overlap with mapped wetlands, stream corridors, and WDFW priority habitat for swans. These flood storage areas could provide opportunities for restoration or enhancement of habitat functions in these sensitive areas, partially offsetting some of the adverse impacts of development. Although Alternative 3 would have the highest overall increase in land use intensity, it would concentrate new development in areas that are more ecologically appropriate, avoiding impacts to the most sensitive habitats.

INDIRECT HABITAT IMPACTS

Alternative 3 may reduce fish stranding by better reconnecting floodplain habitats and providing refuge in undeveloped areas during high flows. Alternative 3 would involve the highest increase in land use intensity, with new commercial development occurring in both previously disturbed areas and areas that are currently less developed, particularly north of SR 530. The associated increase in traffic would impact both major arterials and non-arterial roads, potentially expanding the extent of barrier effects for wildlife similar to Alternative 2. Roads near riparian corridors, wetlands, or other natural areas would be of particular concern, as increased traffic could elevate the risk of wildlife-vehicle collisions and further degrade adjacent habitat through noise, light pollution, and edge effects. The compensatory flood storage areas could provide new opportunities to improve wildlife connectivity and may

provide wildlife refugia, however if secondary recreational uses are planned for these areas, the extent of this benefit would be limited.

3.4.3 Mitigation Strategies

Incorporated Plan Features

All alternatives will incorporate applicable regulations and require compensatory mitigation for new development to minimize impacts on floodplain and wetland function, habitat, and water quality as described in the Regulations and Commitments section. Floodplain compensatory mitigation will be required and addressed by each development proposal within Island Crossing, as they occur. As part of the draft Subarea Plan in Alternative 3, mitigation measures include identifying and supporting multi-purpose compensatory floodwater storage areas, such as floodable agricultural or recreational lands, to reduce flooding impacts on SR 530 and adjacent properties while enhancing habitat connectivity and maintaining ecological function.

Regulations and Commitments

Exhibit 3.4.3-1. identifies the regulations and commitments relevant to development actions occurring in the study area. Existing regulations requiring mitigation of impacts to plants and animals would continue to apply under all alternatives.

Exhibit 3.4.3-1 Federal, State and Local Laws, Plans and Policies.

REGULATORY PROGRAM OR POLICIES	LEAD AGENCY	DESCRIPTION
Endangered Species Act - 16 USC 1531 (ESA)	National Marine Fisheries Service; U.S. Fish and Wildlife Service	The ESA aims to protect and recover imperiled species and their ecosystems. USFWS oversees terrestrial and freshwater species, while NMFS manages marine wildlife and anadromous fish like salmon.
Magnuson-Stevens Fishery Conservation Management Act - 16 USC 38 1801 (MSA)	National Marine Fisheries Service	The MSA, enacted in 1976, governs marine fisheries in U.S. federal waters to prevent overfishing, rebuild stocks, and ensure long-term biological, economic, and social sustainability of seafood resources.
Bald and Golden Eagle Protection Act - 16 USC 668–668c (BGEPA)	U.S. Fish and Wildlife Service	The BGEPA prohibits the taking, possession, or transport of bald and golden eagles, or their parts, nests, or eggs without a permit.
Migratory Bird Treaty Act - 16 USC 703–712 (MBTA)	U.S. Fish and Wildlife Service	The MBTA prohibits killing, capturing, selling, trading, or transporting protected bird species, including

		harm from construction that affects individuals or active nests.
Clean Water Act Section 404 - 33 USC 1251-1387 (CWA)	U.S. Army Corps of Engineers	The CWA is the primary federal law governing water pollution and fill with the objective to restore and maintain the chemical, physical, and biological integrity of the nation's waters.
Hydraulic Code RCW Chapter 77.55	Washington Department of Fish and Wildlife	Work that affects the flow or bed of freshwater or marine waters, including areas above the bank, requires a hydraulic project approval (HPA). WDFW issues general HPAs for routine maintenance and preservation activities.
Washington Regulations for Fish and Wildlife - WAC 220	Washington Department of Fish and Wildlife	Washington State sets its own criteria for listing species and has rules to protect them and their habitats, including definitions for suitable habitat, dispersal areas, buffers, critical habitat, and nesting seasons.
Arlington Municipal Code (AMC) Chapter 20.93 Critical Areas Ordinance	City of Arlington	Arlington regulates trees, fish and wildlife habitat conservation areas, wetlands, and other critical areas under Chapter 20.93 of AMC. The also City regulates shoreline use, development, and ecological protection through its Shoreline Master Program, adopted under the Shoreline Management Act.
State Environmental Policy Act	City of Arlington	SEPA identifies and analyzes environmental impacts associated with governmental decisions. SEPA can be used to modify or deny a proposal to avoid, reduce, or compensate for probable impacts.

Other Potential Mitigation Measures

The City of Arlington has an opportunity to protect habitat from additional impacts by strengthening protections for habitats and species of local importance. Specific actions could include:

- Encouraging restoration of degraded critical areas and buffers to support wildlife habitat.
- Identification, protection, and improvement of migratory corridors, including fish passage barriers, for fish and wildlife.
- Working with neighboring jurisdictions to maintain and improve migration corridors.
- Implementing opportunities to use stormwater facilities and green infrastructure beyond the regulatory requirements that can improve conditions for ground water and surface water quality.

- Planning for climate resilience of natural areas, including forests patches, using a regional landscape-scale approach.
- For Alternative 3, native habitat restoration should be integrated into the design of the regional compensatory floodwater storage facility by restoring or enhancing wetland habitat within or adjacent to the facility, which will improve ecological function while meeting regulatory requirements. To further maximize ecological benefits and regulatory efficiency, the City could develop a state and federally certified in-lieu fee (ILF) mitigation program that would include sites within the subarea. This approach would allow the City, or a qualified sponsor, to provide pre-permitted, consolidated mitigation for unavoidable wetland impacts elsewhere in the subarea or surrounding watershed. An ILF program offers ecological advantages by enabling larger, contiguous restoration areas with greater functional lift than small, fragmented off-site mitigation parcels. It would also help ensure mitigation occurs within the same landscape context as the impacts, preserving local hydrology and habitat connectivity.

3.4.4 Significant Unavoidable Adverse Impacts

Under Alternatives 1 and 2, the following significant unavoidable impacts may occur:

- **Degradation of Sensitive Habitats and Localized Habitat Loss:** Without the regional flood storage facility included in Alternative 3, wetlands, streams, and priority habitat for swans are more vulnerable to degradation from uncontrolled or piecemeal development. Although focused in areas of previously disturbed or low-quality terrestrial vegetation, development may still encroach on higher-quality habitat areas. Since compensatory mitigation may occur outside of the subarea, this could result in permanent habitat loss within the subarea, diminishing local ecological function and resilience. Alternative 1 also results in uncontrolled flooding, which places floodwaters in developed locations that can trigger fish stranding and water quality degradation.
- **Habitat Fragmentation and Connectivity Loss:** Increased development, particularly near riparian corridors or remaining patches of habitat, may result in additional barriers to wildlife movement and increased wildlife-vehicle collisions.

There are no significant unavoidable impacts anticipated under Alternative 3, due to its more coordinated design, inclusion of large flood storage and stormwater treatment areas, and greater opportunity for integrated habitat mitigation and restoration.

3.5 Utilities

3.5.1 Affected Environment

DRINKING WATER AND WASTEWATER

Utilities were analyzed by considering how the proposed alternatives, including changes with building structures and jobs would affect water demand, wastewater generation, and the quantity of stormwater runoff.

3.5.2 Potential Impacts

Thresholds of Significance

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

Impacts Common to All Alternatives

STORMWATER

There is no substantial difference between the No Action Alternative 1, Alternative 2, or Alternative 3, from the standpoint of stormwater flow generation and the ability of the stormwater system to convey the flow.

Alternative 1: No Action

Alternative 1 includes some additional employment and some new building structures that will occur naturally as property is developed or redeveloped, resulting in a small increase in water and sewer demand and stormwater runoff.

Alternative 2: Subarea Plan Partial Implementation

Alternative 2 provides a slight increase of employment over Alternative 1, so Alternative 2 would result in somewhat larger increases in water demand and wastewater generation.

Alternative 3: Subarea Plan Full Implementation

Alternative 3 expects a substantial increase of employment growth for the subarea. Based on application of planning level estimates of water demand and wastewater generation per

employee, Alternative 3 is expected to result in the greatest increase in water demand and wastewater generation; however, water use can vary significantly by industry.

3.5.3 Mitigation Strategies

Regulations and commitments

The City has developed comprehensive plans for all three utilities and these plans are updated regularly to reflect system needs. The Capital Improvement Plan includes the following improvements:

- 12" Water Main 204th Street NE
- Local improvement district (LID) to coordinate developer-funded installation of a 12-inch ductile iron water main along the western boundary of the subarea.

The capital project needed 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.

The Arlington Comprehensive Plan, Water System Comprehensive Plan, Wastewater Comprehensive Plan and Stormwater Comprehensive Plan address levels of service and capital improvements for water, wastewater and stormwater.

- **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 Building Official and/or Fire Code Official. The available fire flow will be determined by the City's engineering staff using the water system hydraulic model. AMC Chapter 13.08 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 into the Stillaguamish River, Portage Creek, and South Slough.

Other Potential Mitigation Measures

In addition to adopted plans and codes, other measures could include:

- Developments may reduce water demand by using new technologies that would reduce per-capita water use (and therefore wastewater service demand) by using newer, low- or no-flow plumbing fixtures and equipment.
- The City could incentivize or require participation in regional stormwater when concepts are developed to help spur development and water quality and stormwater management.

3.5.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts are anticipated for the water, wastewater, and stormwater utilities under any of the alternatives.

4 Acronyms & References

4.1 Acronyms

AMC = Arlington Municipal Code

BGEPA = Bald and Golden Eagle Protection Act

CWA = Clean Water Act

Ecology = Washington State Department of Ecology

ECDC = Edmonds Community Development Code

ESA = Endangered Species Act

HPA = Hydraulic Project Approval

I-5 = Interstate 5

MBTA = Migratory Bird Treaty Act

MEV = Million entering vehicles

MSA = Magnuson-Stevens Fishery Conservation Management Act

NMFS = National Marine Fisheries Service

NOAA = National Oceanic and Atmospheric Administration

SEPA = State Environmental Protection Act

SR 530 = Washington State Route 530

USACE = U.S. Army Corps of Engineers

USC = United States Code;

USFWS = United States Fish and Wildlife Service

WAC = Washington Administrative Code

WDFW = Washington Department of Fish and Wildlife

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