

**From:** [David Toyer](#)  
**To:** [Amy Rusko](#)  
**Cc:** [Mike Pati](#); [Eric Weden](#)  
**Subject:** Island Crossing Subarea DEIS Comments  
**Date:** Tuesday, September 2, 2025 10:00:08 AM  
**Attachments:** [TSA-Pape Draft DEIS Comments.pdf](#)

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Amy,

Attached please find electronic copy of our DEIS comments. Thank you!

DAVID K. TOYER, PRESIDENT  
[TOYER STRATEGIC ADVISORS, INC.](#)  
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425-344-1523  
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September 2, 2025

Ms. Amy Rusko  
Community Development Director  
City of Arlington  
18204 59th Avenue NE  
Arlington, WA 98233

## **ISLAND CROSSING SUBAREA DEIS COMMENTS**

Dear Ms. Rusko:

Our firm has been retained by Papé Properties, Inc. which owns parcels within and immediately adjacent to the municipal boundaries of Arlington (see attached map), which includes parcels that will fall within the Island Crossing Subarea Plan and/or be affected by same. We have very similar questions and comments regarding the DEIS that we had during the scoping period. These include:

- 1. The subarea plan has focused on a regional compensatory flood storage facility north of SR 530, but it does not appear the city (through the subarea plan or otherwise) has adequately evaluated other viable alternatives such as Papé’s proposed compensatory flood storage site to the south, especially considering:**
  - Papé’s regional flood mitigation project would not impact adjacent properties as demonstrated by HEC-RAS 2D modeling.
  - The Papé site has been studied and designed such that it could accommodate regional compensatory storage while maintaining the land’s agricultural use in a manner that benefits the broader community. Papé has signed a Memorandum of Understanding (MOU) that would allow the Arlington Community Food Bank (in partnership with area farmers) to manage the agricultural lands to be a source for local, fresh produce needed by the members of the community they serve.
  - Papé has offered to sell the City its mitigation project (once permitted)—subject to the parties agreeing to mutually acceptable terms.
  - What’s the rationale for the City not studying Papé’s site as an alternative that can achieve similar results?
  
- 2. Specific to regional compensatory flood storage proposed at a facility north of SR 530, Papé has the following questions and comments related to the DEIS’s evaluation of probable significant impacts:**
  - Has there been a hydraulic analysis performed that ensures no adverse impacts to adjacent properties, as well as properties generally located within the entirety of Island Crossing? This would include impacts due to flood elevation changes and scouring velocities.
  - Has there been a volume calculation performed to ensure the proposed compensatory flood storage basin can adequately displace development impacts from fill activities within the floodplain as planned? This would include determining the seasonal-high ground water elevation to establish the flood basin’s floor elevation.
  - The proposed mitigation site appears to propose a compensatory flood mitigation site that does not have a viable outlet, which proposal does not recognize that waters naturally flow north and south during flood events. The proposal does not contemplate “daylighting” the mitigation basin to the north

toward the Stillaguamish River; instead, page vii of the Subarea Plan shows a proposed expansion of a culvert under SR 530 that would redirect flood waters south. What analysis has been done (or will be done) to evaluate whether redirecting flood waters south will impact other properties?

- The culvert under I-5 at South Slough is known to have inadequate capacity to convey flood waters to the west, acting as a choke point for flood waters in the area. Has analysis been done to determine if redirecting floodwaters to the south under 530 has the potential to impact I-5?
- Comparing alternatives, Papé's regional flood mitigation project will not impact adjacent properties as demonstrated by HEC-RAS 2D modeling, but construction of the culvert under SR 530 and redirection of flood waters to the south may have significant, adverse impacts to Papé's mitigation project and surrounding properties.
- The Subarea plan does not include mitigation considerations for probable significant impacts to existing compensatory flood mitigation basins for Pilot or Dwayne Lane Chevrolet, yet these significant areas of land are zoned commercial, included within the City's Comprehensive Plan for development, served by City utilities, accessed by roads within City ROW, and integral to the City's future economic development goals.
- If future floodwaters are directed south, and they impact properties like Papé's, how will the City mitigate and/or compensate property owners for these impacts and/or additional development costs?

**3. It is not clear that the DEIS fully addresses probable significant impacts such as:**

- The approvals required for the City's proposed mitigation basin if it directs flood waters to outlet at the Stillaguamish River and/or south to the South Slough culvert at I-5 (WSDOT, USACE, NOAA, etc.).
- The potential ESA and/or turbidity impacts related to directing the compensatory storage north to an outlet into the Stillaguamish River.
- How does the current proposal reconcile with the NEPA application already completed for the Highway 530 roundabout which specifically identifies mitigating flood impacts to a compensatory flood mitigation site south of 530?

**4. The proposed mitigation site as identified in the Subarea Plan and DEIS appears to conflict with the City's intended effort to maximize the development potential of Island Crossing even as it focuses most of its attention north of SR 530.** Thus, the subarea plan does not account for all development alternatives and potential economic development benefits that can be achieved from alternatives (including Papé's compensatory mitigation site) that can support development in the south portion of this subarea.

Thank you for your time and consideration. As this process moves forward, we anticipate having additional questions.

Sincerely,



David Toyer  
President

**From:** [David Toyer](#)  
**To:** [Amy Rusko](#)  
**Cc:** [Eric Weden](#); [Mike Pati](#)  
**Subject:** Island Crossing Subarea DEIS Comments  
**Date:** Tuesday, September 2, 2025 10:09:25 AM  
**Attachments:** [Pape Parcels - Subarea.pdf](#)  
[Pape Parcels.pdf](#)

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Amy,

My apologies. These two maps should have accompanied the comment letter I just emailed a few minutes ago.

Thanks!

DAVID K. TOYER, PRESIDENT  
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## Executive Summary

### Background and Purpose

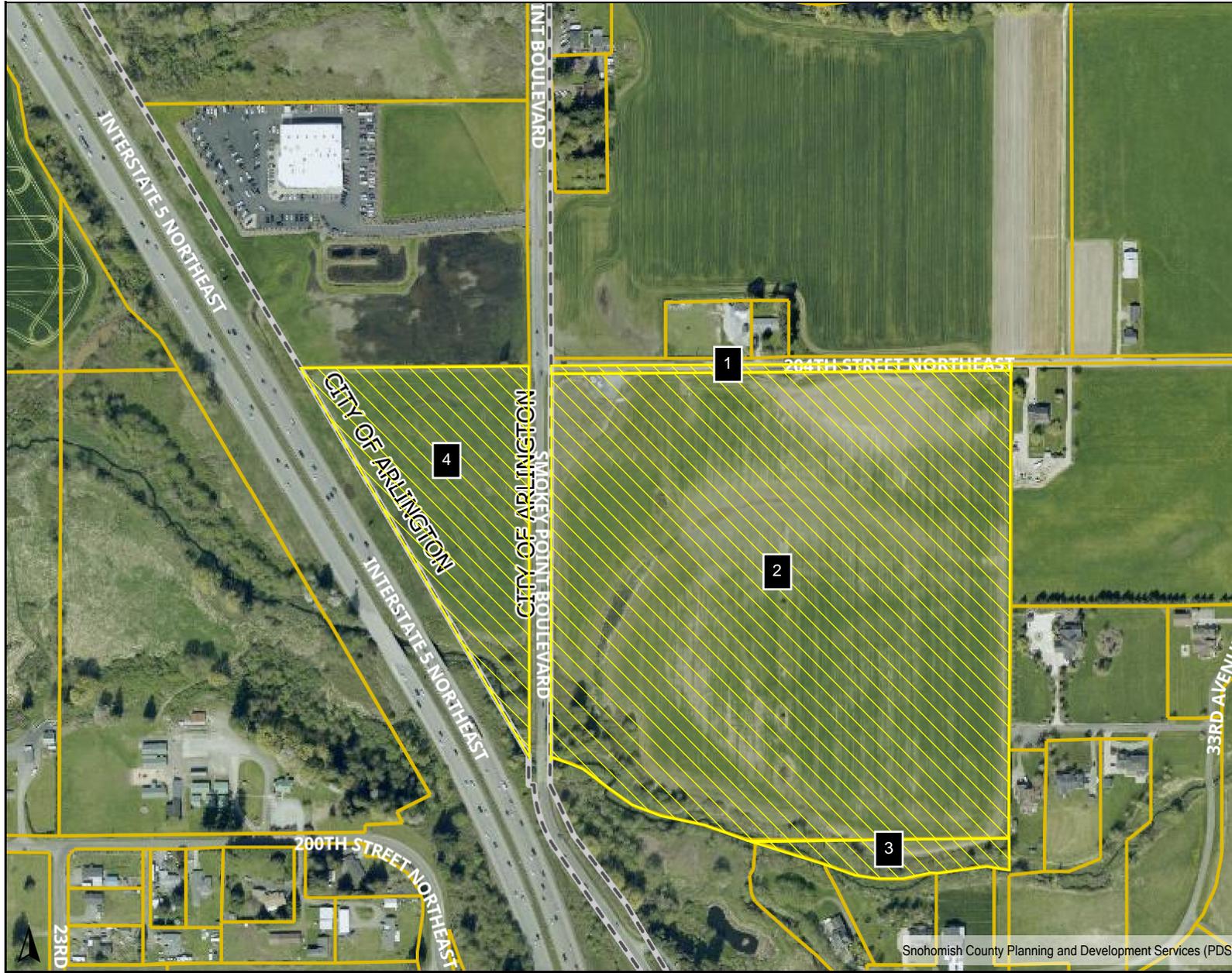
Island Crossing is an 87-acre area in northwest Arlington, well-connected to the region and the economic centers of Old Town and the Cascade Industrial Center, and a gateway to the Stillaguamish Valley and Snohomish County's agricultural lands. Though it has the potential to play a vital role in the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

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.



# Pape Parcels

Map Generated On: 07/08/2025



## Legend

Administrative Boundaries

City Limits



Cadastral

Parcels

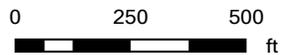


Aerial Imagery

Road Labels (white)

Aerial 2024

- Red: Band\_1
- Green: Band\_2
- Blue: Band\_3



Scale 1 : 7425

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Snohomish County Planning and Development Services (PDS)