

City of Arlington | **Lindsay Subarea**

# Planned Action Environmental Impact Statement Volume I



November 2025



# City of Arlington

Community & Economic Development

November 25, 2025

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

Dear Reader,

The City of Arlington, jointly with MJS Investors, is developing the Lindsay Subarea Plan and has completed a programmatic Environmental Impact Statement (EIS) analyzing potential impacts of implementing the plan. The Draft EIS was published on September 26, 2025, and the City provided a 30-day comment period. The Final EIS builds on the Draft EIS. Chapter 4 presents updates and clarifications, and Chapter 5 responds to comments on the Draft EIS.

The City is considering adoption of a Planned Action Ordinance (PAO) under RCW 43.21C.440 and associated SEPA Rules in WAC 197-11 to streamline environmental review and permitting process for future proposals consistent with the PAO, Subarea Plan, and development regulations. This Planned Action EIS provides a broad assessment of potential environmental impacts of planning policies and planning-level decisions, comparing a “No Action” Alternative and an “Action” Alternative to help the City assess impacts, benefits, and trade-offs, and select a Preferred Alternative.

As the City reviews and adopts 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 and infrastructure investments and what environmental impacts may occur from such growth. This EIS evaluates potential impacts related to the following topics: Land Use and Urban Form, Natural Environment, Transportation, Public Services, and Utilities.

The EIS analyzes two alternatives for the Lindsay Subarea, and the City selected Alternative 2 Proposal as the preferred alternative:

- **Alternative 1 No Action:** Retain existing Residential Ultra Low-Capacity zoning and follow current development standards and capital improvement plans over the next 20 years.
- **Alternative 2 Proposal, Preferred Alternative:** Implement AMC 20.44.032 to allow for low- to moderate-intensity housing such as small-lot homes, townhomes, and multifamily units, supported by infrastructure, transportation, and parks and trails investments. The Preferred Alternative includes more detail on the intended residential density and flexibility on building type variety.

Please see the Fact Sheet for more information. Thank you for your interest in the Lindsay Subarea Plan and EIS.

Sincerely,

A handwritten signature in blue ink that reads "Amy Rusko". The signature is written in a cursive, flowing style.

Amy Rusko, Community & Economic Development Director and SEPA Official

# Fact Sheet

## Project Title

Lindsay Subarea Planned Action

## Proposed Action and Alternatives

The City of Arlington, jointly with MJS Investors, is conducting a community planning process to develop a vision, plan, and implementation strategies for the Lindsay Subarea. This planning process will lay the groundwork for continued, coordinated, and efficient growth of the neighborhood. The final product is an adopted Lindsay Subarea Plan, which will be incorporated in the City's development code, and Planned Action Ordinance (PAO) to facilitate development that meets community goals. The subarea plan is being developed for consistency with the Growth Management Act, countywide planning policies, and the City of Arlington Comprehensive Plan.

The PAO will be developed under RCW 43.21C.440 and associated SEPA rules in WAC 197-11 based on the Environmental Impact Statement (EIS). Future proposals consistent with the Planned Action Ordinance, Subarea Plan, and development regulations would have a streamlined environmental review and permitting process.

The Planned Action EIS will assess two alternatives. The No Action alternative assumes no change to current regulations under the existing Residential Ultra Low Capacity zoning and development standards. Additionally, the City commitments, policies, and capital improvement plans would continue as planned over the next 20 years. The Action Alternative implements AMC 20.44.032 to accommodate low- to moderate-intensity residential uses, including small-lot detached single-family homes, townhomes, and multifamily housing. This alternative also includes investments in capital infrastructure, transportation improvements, and a comprehensive system of parks, open spaces, and trails within the subarea.

## Proponent

MJS Investors

## Lead Agency

City of Arlington

## Location

The Lindsay Master Plan Subarea is bounded by SR 531 (172<sup>nd</sup> St NE) on the north, the 84<sup>th</sup> Ave NE alignment on the east, the 168<sup>th</sup> St NE alignment on the south, and the 75<sup>th</sup> Ave NE alignment on the west, in the Hilltop neighborhood.

## Tentative Date of Implementation/Action

Subarea Plan adoption expected Winter 2025

## Responsible SEPA Official

Amy Rusko, Community and Economic Development Director  
City of Arlington  
18204 59th Avenue NE,  
Arlington, WA 98233  
[arusko@arlingtonwa.gov](mailto:arusko@arlingtonwa.gov)  
(360) 403-3550

## Contact Person

Amy Rusko, Community and Economic Development Director  
City of Arlington  
18204 59th Avenue NE,  
Arlington, WA 98233  
[arusko@arlingtonwa.gov](mailto:arusko@arlingtonwa.gov)  
(360) 403-3550

## Required Approvals

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

- Adoption of Lindsay Subarea plan
- Adoption of Design and Development Regulations 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.

## Principal EIS Authors and Contributors

Under the direction of the City of Arlington, the consultant team prepared the EIS as follows:

- **MAKERS:** Prime, alternatives, land use/urban form, public services, noise, subarea plan, and outreach
- **Land Technologies Inc:** Action alternative, utilities
- **Transpo Group:** Transportation
- **Soundview:** Natural environment

## Draft EIS Date of Issuance

September 26, 2025

## Public Comments on the Draft EIS

The City received 6 comments from citizens, agencies, tribes, and all interested parties during the public comment period on the Draft EIS held from September 26, 2025 to October 27, 2025.

## 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](#).

## Subsequent Environmental Review

If the Planned Action Ordinance is adopted, project-specific review would follow procedures outlined in the Planned Action Ordinance.

## 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 EIS

This EIS is posted on the website below. 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/892/Lindsay-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
- WSDOT Aviation Division
- Department of Commerce
- Department of Corrections
- Department of Ecology
- Energy Facility Site Evaluation Council (EFSEC)
- Department of Fish and Wildlife
- Department of Health
- Department of Natural Resources
- Parks and Recreation Commission
- Department of Social and Health Services
- Department of Transportation
- Department of Transportation - Management of Mobility Division

## Regional & County Agencies

- Puget Sound Partnership
- Puget Sound Regional Council
- Snohomish County – Public Works
- Snohomish County – Planning

## Arlington, Adjacent Jurisdictions, Service Providers

- Snohomish County
- Snohomish County PUD
- Snohomish Health District
- Waste Management
- Arlington Public Works
- Arlington School District
- Arlington Police Department
- North County Regional Fire Authority
- City of Marysville

## Community Organizations & Individuals

- Property owners within 500 feet of the subarea

# Contents

<b>1</b>	<b>SUMMARY</b>	<b>1</b>
1.1	Introduction	2
1.2	Study Area	2
1.3	Purpose	4
1.4	SEPA Process	6
1.4.1	Environmental Review	6
1.4.2	Public Comment Opportunities	6
1.4.3	Scope of Environmental Review	7
1.5	Objectives and Alternatives	7
1.5.1	Objectives	7
1.5.2	Alternatives Summary	8
1.6	Key Issues & Options	8
1.7	Benefits and Disadvantages of Delaying Implementation of the Proposal	9
1.8	Summary of Impacts & Mitigation Measures	9
1.8.1	Land Use and Urban Form	10
1.8.2	Natural Environment	11
1.8.3	Transportation	12
1.8.4	Public Services	13
1.8.5	Utilities	14
1.9	Significant Adverse Impacts	15
<b>2</b>	<b>PROPOSAL &amp; ALTERNATIVES</b>	<b>16</b>
2.1	Introduction	17
2.1.1	Proposal Overview	17
2.1.2	Study Area	18
2.2	SEPA Process	19
2.2.1	Environmental Review Process	19
2.2.2	Scope of Environmental Review	19
2.3	Planning Context	21

2.3.1	Arlington Comprehensive Plan	21
2.3.2	AMC 20.44.032 Subarea Plans	22
2.4	Public Engagement	24
2.5	Objectives and Alternatives	27
2.5.1	Proposal Objectives	27
2.5.2	Alternative 1: No Action	27
2.5.3	Alternative 2: Proposal, Preferred Alternative	29
<b>3</b>	<b>AFFECTED ENVIRONMENT, IMPACTS, &amp; MITIGATION MEASURES</b>	<b>39</b>
<hr/>		
3.1	Land Use and Urban Form	40
3.1.1	Affected Environment	40
3.1.2	Potential Impacts	49
3.1.3	Mitigation Strategies	55
3.1.4	Significant Unavoidable Adverse Impacts	60
3.2	Natural Environment	60
3.2.1	Affected Environment	60
3.2.2	Potential Impacts	63
3.2.3	Mitigation Strategies	70
3.2.4	Significant Unavoidable Adverse Impacts	77
3.3	Transportation	78
3.3.1	Affected Environment	78
3.3.2	Potential Impacts	85
3.3.3	Mitigation Strategies	93
3.3.4	Significant Unavoidable Adverse Impacts	94
3.4	Public Services	95
3.4.1	Affected Environment	95
3.4.2	Potential Impacts	102
3.4.3	Mitigation Strategies	106
3.4.4	Significant Unavoidable Adverse Impacts	107
3.5	Utilities	108
3.5.1	Affected Environment	108
3.5.2	Potential Impacts	112
3.5.3	Mitigation Strategies	114
3.5.4	Significant Unavoidable Adverse Impacts	115
<b>4</b>	<b>CORRECTIONS AND CLARIFICATION</b>	<b>116</b>
<hr/>		
4.1	Introduction	117
4.2	Chapter 1 Summary	117

4.3	Chapter 2 Proposal & Alternatives	117
4.4	Chapter 3 Affected Environment, Impacts & Mitigation	118
4.4.1	Section 3.1 Land Use and Urban Form	118
4.4.2	Section 3.2 Natural Environment	118
4.4.3	Section 3.3 Transportation	118
4.4.4	Section 3.4 Public Services	118
4.4.5	Section 3.5 Utilities	119
4.5	Appendices	119
<b>5</b>	<b>COMMENTS AND RESPONSES</b>	<b>120</b>
<hr/>		
5.1	Introduction	121
<b>6</b>	<b>ACRONYMS &amp; REFERENCES</b>	<b>127</b>
<hr/>		
6.1	Acronyms	128
6.2	References	128

# Exhibits

Exhibit 1.1-1. Lindsay Subarea Context	3
Exhibit 1.1-2. Lindsay Subarea Study Area	4
Exhibit 1.3-1. Planned Action Process	6
Exhibit 1.7-1. Summary of Potential Land Use and Urban Form Adverse Impacts and Mitigation Measures to Reduce Impacts	10
Exhibit 1.7-2. Summary of Potential Natural Environment Adverse Impacts and Mitigation Measures to Reduce Impacts	11
Exhibit 1.7-3. Summary of Potential Transportation Adverse Impacts and Mitigation Measures to Reduce Impacts	12
Exhibit 1.7-4. Summary of Potential Public Services Adverse Impacts and Mitigation Measures to Reduce Impacts	13
Exhibit 1.7-5. Summary of Potential Utilities Adverse Impacts and Mitigation Measures to Reduce Impacts	14
Exhibit 2.1-1. Study Area	18
Exhibit 2.4-1. Engagement Summary	24
Exhibit 2.5-1. Alternative 1: No Action	28
Exhibit 2.5-2. Alternative 1: No Action - Housing and Jobs Capacity by 2044	28
Exhibit 2.5-3. Preferred Alternative	29
Exhibit 2.5-4. Alternative 2: Proposal Example Site Plan	30
Exhibit 2.5-5. Alternative 2, Preferred: Expected Housing Units	31
Exhibit 2.5-6. Alternative 2, Preferred: Proposed Housing	31
Exhibit 2.5-7. Alternative 2: Proposal, Preferred – Future Development Area Residential Density	32
Exhibit 2.5-8. Alternative 2, Preferred: Housing Types	33
Exhibit 2.5-9. Housing type examples	33
Exhibit 2.5-10. Open Space and Trails	34
Exhibit 2.5-11. Recreational Facilities, Open Space, and Trail System	35
Exhibit 2.5-12. Shared Open Space Illustrations	36
Exhibit 2.5-13. Alternative 2, Preferred: Street Types	37

Exhibit 2.5-14. Street type examples	38
Exhibit 3.1-1. Summary of City and Regional Planning Framework	41
Exhibit 3.1-2. Lindsay Zoning Map	42
Exhibit 3.1-3. RULC Density and Dimension Standards	43
Exhibit 3.1-4. Lindsay’s 2044 Comprehensive Plan and PSRC Housing Capacity	44
Exhibit 3.1-5. Lindsay Subarea Full TAZs Map	45
Exhibit 3.1-6. Noise levels near Lindsay Subarea	47
Exhibit 3.1-7. Arlington Municipal Airport Traffic Patterns	48
Exhibit 3.1-8. Alternatives Consistency with City and Regional Planning Framework	49
Exhibit 3.1-9. Net New Housing Units in 2044 by Alternatives	51
Exhibit 3.1-10. Lindsay Development Standards	55
Exhibit 3.1-11. Lindsay Design Standards Overview	57
Exhibit 3.2-1. Wetlands and Streams	61
Exhibit 3.2-2. AMC 20-93 Code Allowances with Associated Mitigation Requirements	71
Exhibit 3.3-1. Subarea Location and Study Intersections Locations	79
Exhibit 3.3-2. Existing (2025) PM Peak Hour Volumes	82
Exhibit 3.3-3. Existing Weekday PM Peak Hour Intersection LOS Summary	83
Exhibit 3.3-4. Five Year Collision Summary – 2019 to 2023	84
Exhibit 3.3-5. 2044 Lindsay Subarea Full TAZs Weekday PM Peak Hour Trip Generation	87
Exhibit 3.3-6. 2044 Alternative 1 PM Peak Hour Volumes	88
Exhibit 3.3-7. 2044 Alternative 1 Weekday PM Peak Hour Intersection LOS Summary	89
Exhibit 3.3-8. 2044 Alternative 2– Lindsay Subarea Plan Weekday PM Peak Hour Trip Generation	90
Exhibit 3.3-9. 2044 Alternative 2 PM Peak Hour Volumes	91
Exhibit 3.3-10. 2044 Alternative 2 – Proposal (Lindsay Subarea Plan) Weekday PM Peak Hour Intersection LOS Summary and Comparison	92
Exhibit 3.4-1. Public Services in Arlington	95
Exhibit 3.4-2. Parks and Trails within 1 mile of Lindsay	96
Exhibit 3.4-3. PRMP Planned Improvements	98
Exhibit 3.4-4. Average Class Size based on Educational Service Standards 2022-2023	99
Exhibit 3.4-5. Public School Serving the City of Arlington	99
Exhibit 3.4-6. New Students by Alternative	102
Exhibit 3.4-7. New Officers Required to Maintain Current Ratio	103
Exhibit 3.4-8. New Firefighters Required to Maintain Current Ratio	103
Exhibit 3.5-1. Existing offsite infrastructure and optional routes	109

Exhibit 3.5-2. Offsite water system	111
Exhibit 3.5-3. Arlington Capital Projects near Lindsay Subarea	115
Exhibit 5.2-1. Responses to Individual Comments	121

# 1 SUMMARY

# 1.1 Introduction

The Final Environmental Impact Statement (Final EIS) completes the environment review process for the City of Arlington’s Lindsay Subarea Plan, development and design standards, and Planned Action Ordinance. It incorporates the comments received on the Draft EIS and applies the necessary corrections or clarifications. The Final EIS presents the preferred alternative as Alternative 2 Proposal, Preferred Alternative, adding flexibility for the Future Development Area’s site layout to better reflect critical area buffers, provided that land uses remain consistent with AMC 20.44.032 and maintain the anticipated residential density of around 11 units per acre within the gross buildable land area (excluding critical areas, buffers, and easements).

The Final EIS builds on the Draft EIS by providing updates since the Draft EIS was issued on September 26, 2025. Because the Preferred Alternative closely matches the Draft EIS’s Alternative 2 Proposal, no new analyses have been conducted. The Final EIS adds Chapter 4 Corrections and Clarifications, Chapter 5 Comments and Responses, and Appendix G Comment Letters. Appendix G Comment Letters provides a copy of the comments received during the Draft EIS comment period. In the Final EIS’s Chapters 1 through 3, text deletions are shown with ~~strikethrough~~, and new text is underlined.

## 1.2 Study Area

The Lindsay Subarea, also referred to as the Subarea, is located at the southern portion of the Hilltop neighborhood in southeast Arlington. The Lindsay Annexation was completed in 2022 under Ordinance 2022-003, making Lindsay one of the neighborhoods within the Hilltop Subarea. Lindsay retains much of its agricultural-rural character, with single family homes interspersed with large open fields and natural areas like forests and wetlands. A ravine is located at the western portion of the Subarea and the seasonal Edgecomb Creek tributaries run through at two locations. Future development is anticipated to mirror the patterns of nearby subdivisions, such as Edgecomb, Gleneagle, and Northern Hilltop (see Exhibit 1.1-1. Lindsay Subarea Context).

The SR 531 (172<sup>nd</sup> St NE) and SR 9 provide local and regional connections across Arlington and into nearby towns and cities. The SR 531(172<sup>nd</sup> St NE) runs along the northern edge of the Subarea and provide connection to I-5 to the east and SR 9 to the west. SR 9 connects Arlington to other the cities within Snohomish and Skagit counties.

Lindsay benefits from its proximity to key commercial, civic, and industrial hubs, supporting its evolution as a complete neighborhood.

- **Commercial:** The intersection of SR 531 (172<sup>nd</sup> St NE) and SR 9 is identified as a future commercial node with retail, services, and community-focused businesses that serve nearby residents and visitors.
- **Civic:** Just northeast of Hilltop, at the intersection of Crown Ridge Blvd and SR 9, is a cluster of institutions, including Pioneer Elementary School, Arlington High School, and the Byrnes Performing Arts Center.
- **Cascade Industrial Center (CIC):** West of 67<sup>th</sup> Ave NE is the second-largest Manufacturing-Industrial Center in Snohomish County. The CIC includes a range of resource-based manufacturing and processing facilities, as well as the Arlington Municipal Airport. It is a key employment hub and may attract family and working-age households to the Lindsay area.

Lindsay Subarea has two development areas as defined below. Development boundaries are identified in Exhibit 1.1-2 Lindsay Subarea Study Area.

- **Pending Project Area:** Properties assembled by MJS investors, and where development is anticipated closely following the Subarea Plan adoption.
- **Future Development Area:** Properties within the Subarea that are outside of MJS land assembly. The timing and nature of development in this area remain uncertain.

### Exhibit 1.1-1. Lindsay Subarea Context



Source: MAKERS, 2025.

**Exhibit 1.1-2. Lindsay Subarea Study Area**



Note: Replaced map: the Pending Project Area expanded to include additional properties.  
 Source: MAKERS, 2025

## 1.3 Purpose

This document is a draft non-project EIS that analyzes environmental impacts associated with the Lindsay 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 City of Arlington, jointly with MJS Investors, has begun the community planning process for the Lindsay Subarea to guide future land use, economic development, environment, public facilities and services, and transportation. The Lindsay Subarea Plan is being developed in accordance with the Growth Management Act (GMA), countywide planning policies, and Arlington’s Comprehensive Plan. Once adopted, the Subarea Plan will be integrated into the City’s development code and guide future land use decisions.

The Lindsay Subarea planning process is also guided by [Arlington Municipal Code \(AMC\) 20.44.032](#) Subarea Plans, amended in November 2023 through the [Ordinance No. 2023-016](#) (see Section 2.3.2). AMC 20.44.032 requires subarea plans for all fourteen Comprehensive Plan-designated subareas, including Lindsay, and mandates they include a Planned Action

EIS to support coordinated development with a mix of housing, transportation, amenities, infrastructure, and capital improvements.

As part of this process, the City intends to adopt a Planned Action Ordinance for the Lindsay Subarea under RCW 43.21C.440 and associated State Environmental Policy Act (SEPA) rules in WAC 197-11, streamlining permitting processes for development proposals consistent with the Planned Action Ordinance and Lindsay Subarea Plan.

Alternatives are different approaches to achieve the proposal's objective and serve as the basis for environment analysis. The two alternatives under consideration in this EIS are described in **Section 1.4** and summarized below:

- **Alternative 1: No Action.** Maintains current regulations under the existing Residential Ultra Low-Capacity zoning and development standards. City commitments and capital improvement plans would continue as planned over the next 20 years.
- **Alternative 2: Proposal.** Implements AMC 20.44.032 to accommodate low- to moderate-intensity housing (e.g., small-lot homes, townhomes, multifamily), along with investments in infrastructure, transportation, parks and trails.

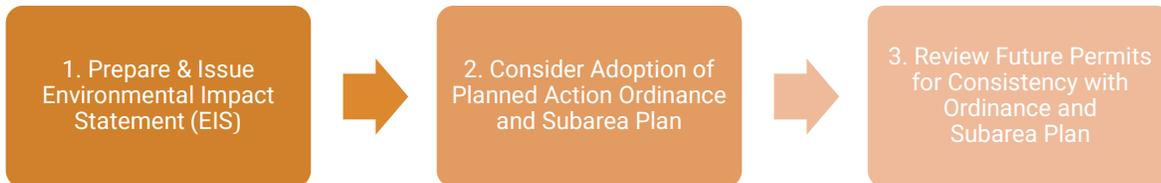
# 1.4 SEPA Process

## 1.4.1 Environmental Review

Under RCW 43.21C.440 and WAC 197-11-164, the City of Arlington is designating the Lindsay Subarea as a Planned Action area. Instead of conducting project-by-project environmental reviews, 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.

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 the completion of the EIS process, the City will consider adopting the Planned Action Ordinance and Subarea Plan. Future permits will be reviewed for consistency with these adopted plans.

### Exhibit 1.3-1. Planned Action Process



## 1.4.2 Public Comment Opportunities

The City led numerous community engagement activities and informal conversations from the Comprehensive Plan outreach that help inform the Subarea Plan and the alternative concepts studied in the Draft EIS. In late May 2025, the city held a 21-day scoping period. A summary of the public engagement is found in Section 2.4..

## 1.4.3 Scope of Environmental Review

SEPA elements of the environment that will be analyzed in the EIS include:

- **Land Use and Urban Form:** Relationship to existing land use plans, aesthetics/urban form, housing, and noise
- **Natural Environment:** Earth and water quality and plants and animals
- **Transportation:** Non-motorized facilities, traffic volumes, operations, and safety
- **Public Services:** Parks, schools, police, and fire emergency services
- **Utilities:** Water, sewer, electrical power, and natural gas

See section 2.2.2 Scope of Environmental Review for information on why other environmental topics were not included.

# 1.5 Objectives and Alternatives

## 1.5.1 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:

- Define action strategies that reflect community priorities and citywide goals for Lindsay, compatible with the Arlington Comprehensive Plan.
- Evaluate environmental hazards and growth potential to align future infrastructure investment that supports housing, public space, multimodal transportation, and environmental health.
- Develop recommendations for new zoning standards, design standards, and adjustments to other city regulations for City Council consideration

## 1.5.2 Alternatives Summary

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

Under SEPA rules, 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, and impacts and compare them to the impacts of the No Action baseline.

This EIS analyzes two alternatives:

- **Alternative 1: No Action** assumes that development would occur within the Subarea based on the current Comprehensive Plan land use, zoning, and development standards
- **Alternative 2: Proposal, Preferred Alternative**, implements AMC 20.44.032 to accommodate varied housing, along with investments in infrastructure, transportation, parks and trails.

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. Alternative 2, with slight clarifications, is the Preferred Alternative. The alternatives are described in detail in Chapter 2.

## 1.6 Key Issues & Options

The key issues facing decision makers are summarized below.

- Approval of a Subarea Plan Update including a vision, guiding principles, goals and strategies for land use, transportation, natural systems, utilities, proposed infrastructure investments, and programmatic recommendations.
- Approval of a new set of design standards.
- Approval of code amendments for wetland and stream buffers flexibility.
- Type and location of transportation and park infrastructure, and housing in future phases.

## 1.7 Benefits and Disadvantages of Delaying Implementation of the Proposal

If the proposed action is delayed, growth in the Subarea would continue under the Comprehensive Plan and current zoning, instead of under a coordinated and more geographic-specific and detailed subarea plan. This would allow for growth but would not fully accommodate regional growth strategies or targets to the same degree as described in Alternative 2 Proposal. Retention of Alternative 1 No Action would lead to a dispersed growth pattern that falls short of meeting housing goals for more diverse housing types. It could result in inconsistencies with transportation metrics, as well as delays in infrastructure investments. Alternative 1 No Action would likely cause greater adverse impacts on natural resources and miss opportunities to leverage the Tulalip Tribes efforts to enhance the Edgecomb Creek and surrounding wetlands. Delaying Alternative 2 would also be inconsistent with the Growth Management Act and City of Arlington planning policies, potentially hindering the City to attain regional, state, and federal grants and loans for infrastructure.

## 1.8 Summary of Impacts & Mitigation Measures

This section highlights the impacts that would potentially result from the alternatives analyzed in this Draft EIS. This summary is not intended to be a substitute for the complete discussion of each element that is contained in Chapter 3.

# 1.8.1 Land Use and Urban Form

**Exhibit 1.7-1. Summary of Potential Land Use and Urban Form Adverse Impacts and Mitigation Measures to Reduce Impacts**

	Alternative 1: No Action	Alternative 2: Proposal
<b>Impacts</b>	<ul style="list-style-type: none"> <li>▪ <b>Relationship to Existing Land Use Plans/Housing:</b> Projected housing growth in Alternative 1 is much lower than the adopted growth targets in Arlington Comprehensive Plan.</li> <li>▪ <b>Aesthetics/Urban Form:</b> Alternative 1’s gradual transition to a more developed landscape is not expected to have urban form impacts.</li> </ul>	<ul style="list-style-type: none"> <li>▪ <b>Relationship to Existing Land Use Plans/Housing:</b> Projected housing growth in Alternative 2 would meet the adopted growth targets in Arlington Comprehensive Plan.</li> <li>▪ Redevelopment would be consistent with the Lindsay Subarea Plan, the intent and goals of the Arlington’s Comprehensive plan, Puget Sound Regional Council’s VISION 2050 regional plan for growth, and the requirements of the Washington State Growth Management Act.</li> <li>▪ <b>Aesthetics/Urban Form:</b> Expected development likely shifts from a rural residential landscape to a residential development pattern similar to the adjacent Gleneagle and Hilltop neighborhoods with a slightly more compact urban form but more connected and usable open spaces. More housing type variety with small lot single family homes, townhouses, and apartments/condominiums, coordinated parks, trails, and street design for multimodal connectivity.</li> </ul>
<b>Measures to reduce or eliminate impacts</b>	<ul style="list-style-type: none"> <li>▪ Existing development code and design standards regulate urban form</li> <li>▪ No mitigation measures to meet growth targets</li> </ul>	<ul style="list-style-type: none"> <li>▪ Updates development regulations to allow development that meets Arlington’s residential growth needs.</li> <li>▪ Lindsay Design Standards will be applied to new development to encourage appearance.</li> </ul>

## 1.8.2 Natural Environment

**Exhibit 1.7-2. Summary of Potential Natural Environment Adverse Impacts and Mitigation Measures to Reduce Impacts**

	Alternative 1: No Action	Alternative 2: Proposal
<b>Impacts</b>	<ul style="list-style-type: none"> <li>▪ Grading to level site for development</li> <li>▪ Loss of open field habitat</li> <li>▪ Increased impervious surface</li> <li>▪ Increased runoff</li> <li>▪ Temporary buffer impacts due to grading</li> <li>▪ Expansion of 79<sup>th</sup> Avenue NE</li> <li>▪ <b>Piecemeal development and implementation over extended time, which results in difficult-to-quantify cumulative impacts, and also limits the ability to implement minimization measures, such as grouping developments</b></li> <li>▪ <b>Man-made total fish passage barrier located within Edgecomb Creek on parcel 31052600100300 will likely remain in place</b></li> <li>▪ <b>Degraded Stream Z channel will not be enhanced</b></li> <li>▪ <b>Degraded stream buffers will not be enhanced</b></li> <li>▪ <b>Degraded wetlands will not be enhanced</b></li> <li>▪ <b>Continued non-conforming land uses</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ Grading to level site for development</li> <li>▪ Loss of open field habitat</li> <li>▪ Increased impervious surface</li> <li>▪ Increased runoff</li> <li>▪ Temporary buffer impacts due to grading</li> <li>▪ Expansion of 79<sup>th</sup> Avenue NE</li> <li>▪ <b>Complete and/or partial fill of several low functioning wetlands onsite, resulting in direct and indirect wetland impacts</b></li> <li>▪ <b>Permanent and temporary buffer impacts for allowed uses</b></li> </ul>
<b>Measures to reduce or eliminate impacts</b>	<ul style="list-style-type: none"> <li>▪ Avoid steep slopes</li> <li>▪ Enhance degraded wetland buffers in vicinity of any proposed development per AMC 20.93.830</li> <li>▪ Protected critical areas tracts</li> <li>▪ Stormwater treatment</li> <li>▪ Restoration of temporarily impacted buffer areas</li> <li>▪ Culvert replacement for 79<sup>th</sup> Avenue NE crossing</li> <li>▪ <b>Potential to avoid all direct wetland and stream impacts depending on proposed</b></li> </ul>	<ul style="list-style-type: none"> <li>▪ Avoid steep slopes</li> <li>▪ Enhance degraded wetland buffers in vicinity of any proposed development per AMC 20.93.830</li> <li>▪ Protected critical areas tracts</li> <li>▪ Stormwater treatment</li> <li>▪ Restoration of temporarily impacted buffer areas</li> <li>▪ Culvert replacement for 79<sup>th</sup> Avenue NE crossing</li> <li>▪ <b>Implementation of vegetated corridors</b></li> <li>▪ <b>Use of buffer averaging to ensure no loss of buffer area onsite</b></li> </ul>

Alternative 1: No Action	Alternative 2: Proposal
<p><b>development over the next 20 years</b></p>	<ul style="list-style-type: none"> <li>▪ <b>Enhancement of degraded stream buffers</b></li> <li>▪ <b>Net ecological lift throughout the site and watershed as a result of proposed mitigation actions</b></li> <li>▪ <b>Strategic design will utilize existing degraded or developed areas and group developments together to minimize impacts</b></li> <li>▪ <b>Remove existing non-conforming land uses</b></li> <li>▪ <b>Purchase of credits from appropriate mitigation bank as compensation for impacts</b></li> <li>▪ <b>Onsite wetland creation and enhancement of existing degraded wetlands as compensation for wetland impacts</b></li> <li>▪ <b>Removal of man-made total fish passage barrier located within Edgecomb Creek on parcel 31052600100300 (with project-specific analysis and redevelopment)</b></li> <li>▪ <b>Buffer creation and enhancement as mitigation for buffer impacts</b></li> <li>▪ <b>Implementation of standard minimization measures specified in AMC Table 20.93-5</b></li> <li>▪ <b>Wetland and stream buffer flexibility</b></li> </ul>

## 1.8.3 Transportation

**Exhibit 1.7-3. Summary of Potential Transportation Adverse Impacts and Mitigation Measures to Reduce Impacts**

	Alternative 1: No Action	Alternative 2: Proposal
<p><b>Impacts</b></p>	<ul style="list-style-type: none"> <li>▪ All study intersections meet operational standards with planned improvements except for the SR 9/204th Street NE intersection and 80th Drive NE/SR 531 (172nd Street NE) intersection.</li> </ul>	<ul style="list-style-type: none"> <li>▪ All study intersections meet operational standards with planned improvements except for the SR 9/204th Street NE intersection.</li> <li>▪ As part of the development of the Lindsay subarea, access will be required on a new south leg of the</li> </ul>

	Alternative 1: No Action	Alternative 2: Proposal
<b>Measures to reduce or eliminate impacts</b>	<ul style="list-style-type: none"> <li>▪ The SR 9/204th Street NE intersection is a WSDOT intersection, and it is assumed that WSDOT will assess and address operational deficiencies.</li> <li>▪ To accommodate other planned improvements along SR 531 (172nd Street NE) and provide operations that meet LOS standards, a 2-lane roundabout would be installed at the 80th Drive NE/SR 531 (172nd Street NE) intersection.</li> </ul>	<p>80th Drive NE/SR 531 (172nd Street NE) intersection.</p> <ul style="list-style-type: none"> <li>▪ Two additional accesses would be required along SR 531 (172nd Street NE).</li> <li>▪ The SR 9/204th Street NE intersection is a WSDOT intersection, and it is assumed that WSDOT will assess and address operational deficiencies.</li> <li>▪ To accommodate other planned improvements along SR 531 (172nd Street NE) and provide operations that meet LOS standards, a 2-lane roundabout with an added south leg would be installed at the 80th Drive NE/SR 531 (172nd Street NE) intersection.</li> <li>▪ A full access would be provided west of 80th Drive NE, and a right-in/right-out only access would be provided east of 80th Drive NE.</li> </ul>

## 1.8.4 Public Services

**Exhibit 1.7-4. Summary of Potential Public Services Adverse Impacts and Mitigation Measures to Reduce Impacts**

	Alternative 1: No Action	Alternative 2: Proposal
<b>Impacts</b>	<ul style="list-style-type: none"> <li>▪ Parks, schools, police, and fire/emergency services have adequate capacity for the expected level of growth.</li> <li>▪ Residential growth could occur without a coordinated parks and trails system in new residential neighborhoods.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Although there is an increase in demand for schools, police, and fire/emergency services, existing plans support the expected level of growth.</li> <li>▪ Transportation investments enhance service delivery/emergency response times and access to community destinations such as schools and parks.</li> <li>▪ 12% of the site is designated as active open space, including common open space and parks, exceeding the AMC 20.44.032 requirement for 10% of the site to be dedicated to parks and trails.</li> <li>▪ Parks investments improve access to green space and other recreational facilities.</li> </ul>

	Alternative 1: No Action	Alternative 2: Proposal
<b>Measures to reduce or eliminate impacts</b>	<ul style="list-style-type: none"> <li>Plans are regularly updated to maintain alignment with evolving community needs, and should continue to do so.</li> </ul>	<ul style="list-style-type: none"> <li>The City, School District, and Fire District should continue coordinating and updating their plans to maintain alignment with evolving community needs.</li> </ul>

## 1.8.5 Utilities

**Exhibit 1.7-5. Summary of Potential Utilities Adverse Impacts and Mitigation Measures to Reduce Impacts**

	Alternative 1: No Action	Alternative 2: Proposal
<b>Impacts</b>	<ul style="list-style-type: none"> <li>Demand for water, sewer, and dry utilities would increase modestly. With planned improvements, sewer and utility capacity likely sufficient.</li> <li>Less compact development patterns would result in less efficient utility infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>Growth would increase demand for water, sewer, and dry utilities. With planned improvements, Arlington’s sewer and water system will have sufficient capacity to serve the additional homes anticipated in Lindsay. With coordination with dry utilities providers, no impacts are anticipated.</li> <li>Utility system would be designed for efficiency, maximizing homes served.</li> </ul>
<b>Measures to reduce or eliminate impacts</b>	<ul style="list-style-type: none"> <li>Planned water and sewer improvements, and ongoing coordination with dry utility providers will maintain adequate system capacity.</li> <li>Utilities will be designed to avoid and mitigate impacts to wetlands and streams, with review during project approval.</li> <li>All new utilities, including improvements along SR 531, will be placed underground.</li> </ul>	<ul style="list-style-type: none"> <li>Onsite sewer and water systems will be built to handle anticipated demand and designed for efficiency.</li> <li>Coordination with dry utility providers will maintain adequate system capacity.</li> <li>Offsite infrastructure upgrades depends on sewer and water modeling.</li> <li>Utilities will be designed to avoid and mitigate impacts to wetlands and streams, with review during project approval.</li> <li>All new utilities, including improvements along SR 531, will be placed underground.</li> </ul>

# 1.9 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:** Alternative 1 No Action would likely not meet the 2044 housing growth targets adopted in the Arlington Comprehensive Plan under the Residential Ultra Low Capacity zoning and development standards. **Not meeting the adopted target could be considered a significant adverse impact unless** the City is able to accommodate housing growth elsewhere.

The following environmental elements, with mitigation, are expected to have no significant adverse unavoidable impacts:

- **Land Use and Urban Form:** Alternative 2 meets the City's housing and urban form goals.
- **Natural Environment:** Alternative 1 would result in limited impacts to the natural environment but would also limit the potential improvements throughout the site. Alternative 2 would result in direct and indirect wetland impacts that would be compensated through onsite and offsite mitigation. The proposed impacts are not anticipated to be considered significant. **Therefore, neither alternative is anticipated to result in significant adverse impacts to the natural environment.** However, Alternative 2 does provide a significant amount of mitigation both as compensation for potential impacts as well as voluntary improvements that are anticipated to provide an overall net lift in ecological benefits of the site.
- **Transportation:** Alternative 1 No Action and Alternative 2 Proposal would result in operational impacts at the 80th Drive NE/SR 531 (172nd Street NE); however, a 2-lane roundabout would be installed to mitigate the operational impacts for both alternatives. **Therefore, neither alternative is anticipated to result in significant adverse transportation impacts.**
- **Public Services:** Anticipated growth under Alternative 1 and Alternative 2 may increase demand for parks, schools, police, and fire/emergency services; however, existing staffing and facility capacity, with continued coordination with agencies, **no significant adverse impacts public service impacts are anticipated.**
- **Utilities.** Utilities are available at varying capacity to accommodate increased land use intensity. Potential impacts cannot be determined until the City's updated system modeling is available; however, continued capital facilities planning and coordination and construction of planned improvements, **no significant adverse impacts are anticipated.**

# 2 PROPOSAL & ALTERNATIVES

# 2.1 Introduction

## 2.1.1 Proposal Overview

The Lindsay Annexation was completed in 2022 under Ordinance 2022-003, making Lindsay one of the neighborhoods within the Hilltop Subarea. In November 2023, *Ordinance 2023-016* amended Arlington Municipal Code (AMC) Section [20.44.032](#) Subarea Plans, which guides the subarea planning process. This amendment introduced several key changes:

- Subarea plans must be created for all fourteen Comprehensive Plan-designated subareas, including two areas designated as Master Planned Neighborhood (MPN) Overlay, which are Lindsay and East Hill.
- Each subarea plan must be developed in conjunction with a Planned Action Environmental Impact Statement (EIS) EIS.
- Planning efforts must support a coordinated and efficient approach to neighborhood development, including a diverse mix of housing, transportation options, community amenities, infrastructure, and capital improvements.

See 2.3.2 for detailed descriptions of required elements.

This draft EIS considers two alternatives for Lindsay Subarea.

- **Alternative 1: No Action** would retain existing Residential Ultra Low-Capacity zoning and follow current development standards and capital improvement plans over the next 20 years.
- **Alternative 2: Proposal, Preferred Alternative**, would implement AMC 20.44.032 to allow for low- to moderate-intensity housing such as small-lot homes, townhomes, and multifamily units, supported by infrastructure, transportation, and parks and trails investments. Allowed development layouts and types are flexible, provided land uses remain consistent with AMC 20.44.032 and maintain the minimum residential density of approximately 5 units per gross acre (approximately 436 units total on the 87.5-acre Lindsay subarea).

## 2.1.2 Study Area

The Lindsay Subarea, also referred to as the Subarea, is located at the southern portion of the Hilltop neighborhood in southeast Arlington. The Subarea encompasses approximately 87 acres. It is bounded by SR 531 (172<sup>nd</sup> St NE) on the north, the 84<sup>th</sup> Ave NE alignment on the east, the 168<sup>th</sup> St NE alignment on the south, and the 75<sup>th</sup> Ave NE alignment on the west.

The SR 531 (172<sup>nd</sup> St NE) and SR 9 provide local and regional connections across Arlington and into nearby towns and cities. The seasonal Edgecomb Creek flows through two locations of the site and the ravine is located in the western portion of the Subarea.

The Lindsay Subarea has two development areas:

- **Pending Project Area:** Properties assembled by MJS investors, and where development is anticipated closely following the Subarea Plan adoption.
- **Future Development Area:** Properties within the Subarea that are outside of MJS land assembly. The timing and nature of development in this area remain uncertain.

Future development proposals within the Pending Project Area and Future Development Area that align with the subarea plan and planned action will undergo streamlined project-level SEPA review. See Study Area 2.2.1 Environmental Review Process.

**Exhibit 2.1-1. Study Area**



Note: Replaced map; the Pending Project Area expanded to include additional properties. Source: MAKERS, 2025

## 2.2 SEPA Process

### 2.2.1 Environmental Review Process

Under RCW 43.21C.440 and Washington Administrative Code (WAC) 197-11-164, the City of Arlington is designating the Lindsay Subarea as a Planned Action area. Arlington will complete upfront SEPA analysis of anticipated future development and adopt a Planned Action Ordinance that clearly defines City and developer responsibilities for mitigation. This EIS provides a cumulative, subarea-wide impact analysis during the areawide planning stage, rather than piecemeal review of the environmental impacts and mitigation on a project-by-project basis during the permit review stage.

Future development that is consistent with the Planned Action Ordinance and Lindsay 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. Following the adoption of a Planned Action Ordinance including specific procedures and mitigation measures, future permits would be reviewed for consistency with the ordinance.

A The Final EIS, ~~will~~ be issued in Winter 2025, ~~and will~~ includes 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 in April 2025 (see Appendix A Scoping Notice & Comment Summary). Following scoping, the City identified the following elements and associated environmental topics that will be analyzed in the EIS:

- **Land Use and Urban Form:** Relationship to existing land use plans, aesthetics/urban form, housing, and noise
- **Natural Environment:** Earth and water quality and plants and animals

- **Transportation:** Non-motorized facilities, traffic volumes, operations, and safety
- **Public Services:** Schools, police, and fire emergency services
- **Utilities:** Water, sewer, cable/telephone, 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.

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

- **Air:** Air quality was not analyzed because the alternatives are not expected to result in significant adverse impacts. Minor dust and equipment exhaust emissions may occur during construction. Air pollution from vehicle exhaust over time is expected as part of urban growth, and by allowing growth in the urban growth area, regional roadway-related air pollution is reduced due to shorter and fewer vehicle trips. Standard mitigation measures are required under local laws such as dust control using water and compliance with vehicle emission standards.
- **Energy and Natural Resources** will continue to be addressed in project-level review with Snohomish County PUD and Puget Sound Energy due to site and use-specific energy needs. No significant adverse impacts are expected to natural resources.
- **Stormwater** is addressed in overview under Water Quality. No adverse impacts are anticipated because development would be required to adhere to City of Arlington Public Works Stormwater Standards and Specifications and *Department of Ecology Stormwater Management Manual for Western Washington (DOE Stormwater Management Manual)*, which would not allow for worsened unmitigated conditions to occur.
- **Environmental Health (topics other than noise)** are not analyzed because the alternatives are not expected to result in significant adverse impacts to environmental health (e.g., toxic chemicals, hazardous waste). Noise is addressed under Land Use and Urban Form due to community interest raised during the scoping community meeting.
- **Light and Glare.** The types of glare and lights (e.g., auto traffic, street lights, and night lights from homes) likely to be produced are typical to the urban environment, are regulated by local building and street standards to prevent spillover onto adjacent properties and promote a dark night sky, and are not expected to result in significant adverse impacts.
- **Recreation** is analyzed in the Public Service element under Parks, and parks and trails opportunities are expected to expand as a result of the Subarea Plan.
- **Historic and cultural preservation.** Project-level review will condition permit approvals to require all construction activity to be subject to study, monitoring, and preservation of tribal cultural and archaeological resources, as is standard practice. No post-colonial historic resources were identified.

## 2.3 Planning Context

### 2.3.1 Arlington Comprehensive Plan

The City's Comprehensive Plan, was adopted in December 2024. As part of this process, the City collaborated with the community to establish a framework guiding future growth in the Hilltop area. The Subarea chapter of the Comprehensive Plan outlines the community's vision for Hilltop, including the Lindsay Subarea, as follows:

*"In 2044 Hilltop has a diversity of housing types allowing all types of families to call this subarea home. Hilltop is home to many residents of Arlington and has entertainment and retail opportunities for the community".*

[Arlington in Motion 2024 & Beyond](#) include goals and policies to ensure the subareas develop in a way that is consistent with the community's visions to promote sustainable, equitable growth that will improve the City's quality of life for generations to come. The following selected goals addressed in the Lindsay Subarea Plan includes:

#### Economic Development Natural Environment

*E-1 Preserve and enhance open space, natural, and cultural resources and strive for equitable geographic and demographic distribution.*

*E-5 Identify, protect, and enhance natural areas to foster resiliency to climate impacts, as well as areas of vital habitat for safe passage and species migration.*

#### Land Use

*LU-1 Provide unique places and context for the growth of social capital and community resiliency.*

*LU-8 Ensure new services and facilities are provided within a reasonable time after the annexation of unincorporated Urban Growth Areas.*

*LU-10 Future growth in the City will be accommodated and served consistent with the PSRC Regional Growth Strategy.*

#### Housing

*HU-1 Encourage a quality and diverse housing stock within the City.*

*HU-2 Provide housing options affordable to all demographics and incomes in all areas and zoning districts of the City.*

*H-5 Encourage mixed-income and mixed-use neighborhoods.*

*Parks, Recreation, and Open Space*

*P-1 Develop an equitable, high-quality parks and recreation system that provides a diversity of recreational, cultural, and educational opportunities that are inclusive and welcoming for all.*

*P-5 Utilize the parks and recreation system to protect unique environmental qualities, natural amenities, wildlife habitats, forest lands, and scenic areas within the city.*

*P-6 Provide a trail system that creates links between commercial and residential areas in Arlington and connects to regional trails, parks, recreation facilities, and open spaces.*

*Transportation*

*T-13 Consider the special needs of subarea transportation facilities including appearance and safety.*

*T-15 Use “Vision Zero” and “Safe Routes to School” guidelines to provide safe walking and biking routes for our residents.”*

The City of Arlington and Snohomish County are planning for residential and employment growth in Hilltop, though no employment growth is projected within the Lindsay Subarea. Housing growth in the Lindsay Subarea is expected to significantly increase by 2044, as outlined in Exhibit 3.1-4. Lindsay’s 2044 Comprehensive Plan and PSRC Housing Capacity

## 2.3.2 AMC 20.44.032 Subarea Plans

[Ordinance No. 2023-016](#), adopted in November 2023, amended [AMC 20.44.032 Subarea Plans](#). This amendment reflects community priorities identified through the 2024 Comprehensive Plan engagement process and emphasizes the importance of coordinated land development through a subarea planning process. [AMC 20.44.032](#) requires subarea plans for all fourteen Comprehensive Plan-designated subareas, including two areas designated with the Master Planned Neighborhood (MPN) Overlay, East Hill and Lindsay. Key amendments include the following:

*“(c) A subarea plan is typically developed to encompass the entire subarea, however under certain circumstances it may be developed to include only specific neighborhoods, corridors, downtown, or other types of special districts that show cohesive characteristics. The East Hill and Lindsay Annexation subareas shall be developed in their entirety.*

*(d) As subarea plans are created, elements of form based code are proposed to be included to provide the community with a predictable design and development pattern that is customized for the specific area*

*(e) Subarea plans are to be processed in conjunction with a Planned Action Environmental Impact Statement (EIS). A planned action is a development project whose impacts have been identified and addressed through an EIS associated with the subarea plan for the specific geographical area before individual projects are proposed. A planned action involves detailed State Environmental Policy Act (SEPA) review and preparation of EIS documents in conjunction with subarea plans, consistent with RCW 43.21C.031 and WAC 197-11-164 through WAC 197- 11-172. The up front analysis of impacts and mitigation measures then facilitates environmental review of subsequent individual development projects.*

*(f) A subarea plan application under the Master Planned Neighborhood (MPN)*

*Overlay shall include the following information:*

*(1) A land use application and submittal checklist with all required documents.*

*(2) Permit fee, as shown on the most current fee schedule.*

*(3) The subarea plan shall include the following elements:*

*i. One element shall be small lot detached single-family residential or cottage housing, with a minimum lot size of 3,600 square feet and a maximum of 4,500 square feet and consisting of seventy (70) percent of the total lots.*

*ii. Second element shall be attached residential, such as town homes, row houses, or duplexes, and shall be developed as fee simple lots through a unit lot subdivision (subject to §20.44.020 Unit lot Subdivisions) and consisting of twenty (20) percent of the total lots.*

*iii. Third element shall be one of the below options and shall consist of ten (10) percent of the total lots.*

*(A) Accessory Dwelling Unit (constructed with residence)*

*(B) Mixed-Use Development (vertical)*

*(C) Multi-Family Apartments*

*(D) Multi-Family Fourplex*

*(E) Multi-Family Garden Apartments*

*(F) Small Commercial*

*iv. Fourth element shall be the location of Recreational Facilities, Open Space, and Trail System that consists of ten (10) percent of the total area of land, minus areas to be preserved as Native Growth Protection Areas (NGPA).*

*(A) This designation shall include areas proposed to be dedicated to the city as public spaces. All dedicated parks shall be a minimum of two (2) acres in size and coordinated with the city prior to approval.*

*(B) The trail system shall consist of a paved trail that connects the required sidewalk system and to all recreation facilities and open spaces.*

- (4) *The subarea plan shall show the location of each housing type listed above in the way of a subdivision layout.*
  - (5) *The architectural design of the structures shall comply with the Development Design Standards pursuant to §20.46 Design.*
  - (6) *The subarea plan shall show the conceptual infrastructure plans that include location, types, and sizes of streets, sewer, water, stormwater, etc.*
  - (7) *Public infrastructure impacts and financing strategies including any improvements to existing on or off-site facilities necessary to support the proposed subarea plan.*
  - (8) *Transportation impact analysis and financing strategies including any improvements to existing on or off-site facilities necessary to support the proposed subarea plan. The analysis shall also include all current and future designated multi-model plans.*
  - (9) *The subarea plan shall adhere to the Arlington Complete Streets Program.*
  - (10) *The subarea plan shall provide anticipated phasing or sector lines on the subarea map.*
- (g) *The subarea plan for the East Hill and Lindsay Annexation area serves as the typical preliminary plat document for development and shall follow the process of a conditional use permit (§20.16.225 Special Use Permits and Conditional Use Permits). “*

## 2.4 Public Engagement

The input from the scoping/neighborhood meeting and Comprehensive Plan outreach helped the City develop the alternatives for this EIS. See Appendix A for scoping/neighborhood meeting summary.

### Exhibit 2.4-1. Engagement Summary

Event	Date	What We Heard
Scoping / Neighborhood Meeting	March 20 - April 10, 2025/ April 7, 2025	<ul style="list-style-type: none"> <li>▪ Community members value the rural character of the area but there are conflicting visions for future land uses within the Subarea.</li> <li>▪ Single-family homes and attached home styles are most preferred in the area. Some community members raised concerns about smaller lot sizes and higher housing density, noting they may not align with the character of surrounding neighborhoods. Others emphasized the importance of offering affordable housing options to support young families and future generations.</li> <li>▪ There is equal interest in placing multifamily homes close or away from 172<sup>nd</sup> St.</li> <li>▪ There is strong interest in expanding park and recreational opportunities. The most desired park feature is an open field or lawn, followed by pedestrian lighting, playgrounds, and seating.</li> </ul>

Event	Date	What We Heard
		<p>Parks located near 172nd Street are considered the most accessible and likely to be used by residents</p> <ul style="list-style-type: none"> <li>▪ Community members stressed the importance of conducting further traffic studies and prioritizing investments in infrastructure along 172nd Street to address safety and meet anticipated capacity needs.</li> <li>▪ Preservation of cultural artifacts and environmental resources in coordination with the Tulalip and Stillaguamish Tribe.</li> <li>▪ Residents should be made aware of the proximity of their dwelling to the Arlington Municipal Airport and associated airport-related impacts (noise and air pollution). Future plans should be reviewed for airspace hazard.</li> </ul>
Comprehensive Plan Public Engagement and Outreach - Housing Survey	2022-2024	<ul style="list-style-type: none"> <li>▪ 48% of those surveyed are satisfied with the sense of community among residents.</li> <li>▪ 12% of those surveyed believed there was an availability of affordable housing within the city.</li> <li>▪ 47% of those surveyed had acceptance of residents of all backgrounds.</li> </ul>
Comprehensive Plan Public Engagement and Outreach - Hilltop Subarea Survey*	2022 -2024	<ul style="list-style-type: none"> <li>▪ Good appearance and has adequate lighting</li> <li>▪ No essential services nearby</li> <li>▪ No easy access to medical services</li> <li>▪ No variety of housing types</li> <li>▪ No bus stops</li> <li>▪ No fully improved streets</li> <li>▪ Not part of a trail network</li> <li>▪ No obvious attractions</li> <li>▪ No public art</li> <li>▪ Mixed results on walkability, neighborhood safety, close to employment, public services, pedestrian concerns, and sites for socialization.</li> </ul>

\*Note: The following survey response is for the Hilltop Subarea and guide the Lindsay Subarea planning process.



## 2.5 Objectives and Alternatives

### 2.5.1 Proposal Objectives

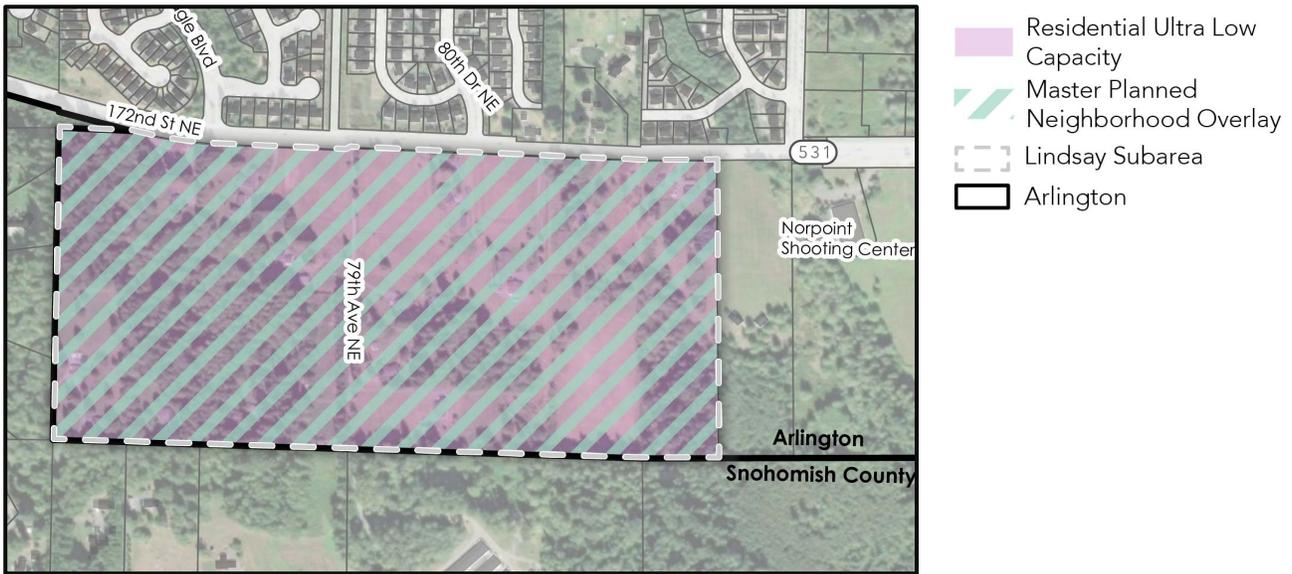
SEPA requires the statement of objectives describing the purpose and need for the proposals. The following objectives apply to the alternatives considered in this EIS:

- Articulate a vision and action strategies to meet community and citywide goals for Lindsay, compatible with the Arlington Comprehensive Plan.
- Encourage diverse housing options, accommodating planned housing growth within the subarea that aligns with citywide goals.
- Encourage high-quality, pedestrian-oriented design that prioritizes walkability, safety, accessibility, and opportunities for social connection.
- Advance Arlington’s tree canopy goals and climate resilience strategies.
- Develop a safe, comfortable, and accessible transportation network for people of all ages and abilities—whether walking, biking, rolling (e.g., wheelchairs and mobility devices), or driving.
- Create a well-connected, cohesive network of parks, open space, and trails.
- Enhance natural environment health through protecting and enhancing wetland and stream health.

### 2.5.2 Alternative 1: No Action

A No Action Alternative is required to be evaluated in the EIS under SEPA. It assumes no change to current regulations and that City commitments, policies, and capital improvement (i.e., parks, roads, and utilities) plans would continue as planned over the next 20 years. The area is zoned Residential Ultra Low Capacity, meaning limited development is allowed without making use of the Master Planned Neighborhood Overlay.

**Exhibit 2.5-1. Alternative 1: No Action**



Source: City of Arlington, MAKERS, 2025

Under the Residential Ultra Low Capacity zoning and development standards, development feasibility, and thus housing capacity, is limited. The City planned for the Lindsay Subarea to develop with about 85 net new housing units, for a total of 102 housing units, over a 20 year period. No jobs currently exist in the Lindsay subarea, and none would be expected with any development occurring under the Residential Ultra Low Capacity zoning.

**Exhibit 2.5-2. Alternative 1: No Action - Housing and Jobs Capacity by 2044**

	Existing	Net New	Total
<b>Housing Units</b>	17	85	<b>102</b>
<b>Jobs</b>	0	0	<b>0</b>

Source: Comprehensive Plan Land Use Forecasts, 2024

Development would likely be piecemeal over time without a cohesive parks, open space, and trails system. A mini-park would be created with any development greater than 25 units (per [AMC 20.52.010](#)). If developments include fewer than 25 units, it is likely no parks would be included. Development would likely include no trails.

# 2.5.3 Alternative 2: Proposal, Preferred Alternative

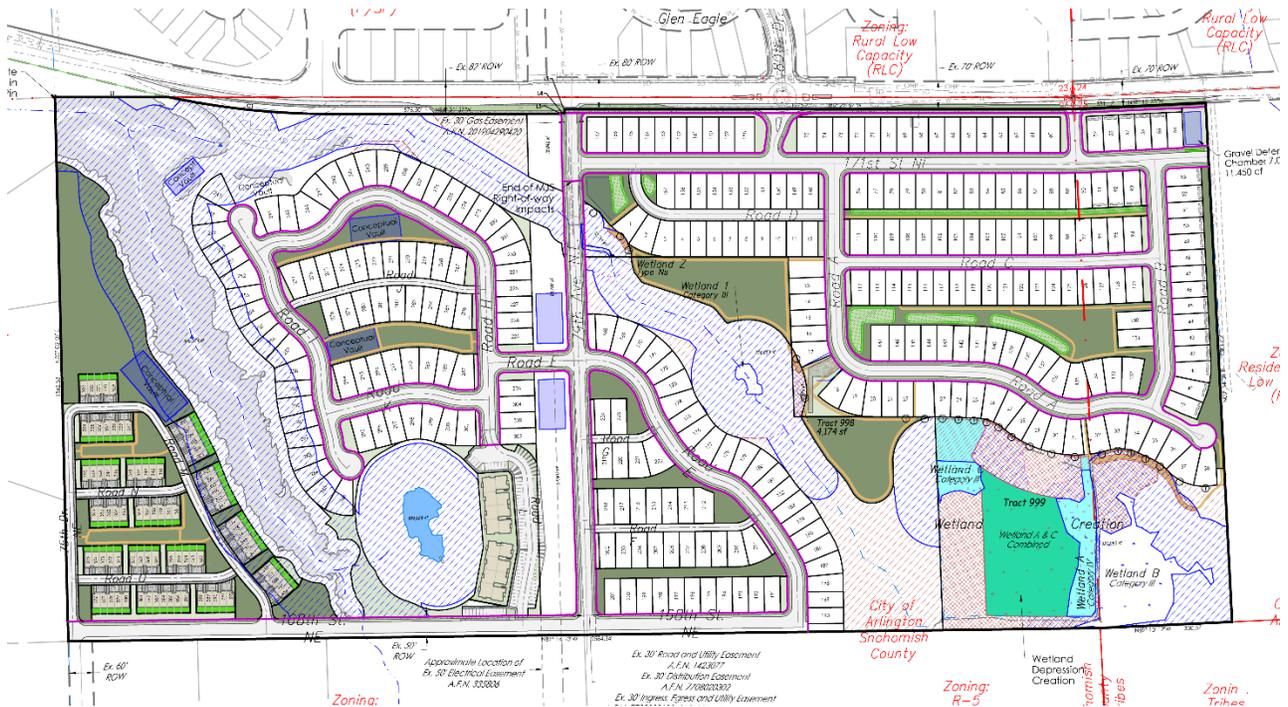
Alternative 2 Proposal would make use of the Master Planned Neighborhood Overlay and implement [AMC 20.44.032](#) (see 2.3.2 AMC 20.44.032 Subarea Plans), accommodating low-to moderate-intensity residential uses, including small-lot detached single-family homes, townhomes, and multifamily housing. This alternative also includes investments in capital infrastructure, transportation improvements, and a park(s), open space, and trails system.

**Exhibit 2.5-3. Preferred Alternative**



Note: This site plan represents a likely land use configuration in the Pending Project Area, while the site layout in the Future Development Area is flexible, provided it follows the Lindsay Subarea Plan standards to ensure the Lindsay Subarea as a whole implements AMC 20.44.032.  
 Source: Land Technologies, 2025; MAKERS, 2025.

**Exhibit 2.5-4. Alternative 2: Proposal Example Site Plan**



Note: This site plan represents one of several possible land use configurations to implement AMC 20.44.032. It would likely need updates in the Future Development Area to meet critical area buffer requirements, and distribution of housing types may change.  
 Source: Land Technologies, 2025

## Land Use

In accordance with [AMC 20.44.032](#), the proposal includes a diverse mix of housing types, totaling 436 units at an average gross density of 5 units per acre. The Subarea would primarily accommodate single-family homes on 3,600 square-foot lots, which would make up approximately 70% of the expected housing units. Townhomes would make up 20% of the units, and multifamily homes would make up 10% of units.

Houses and townhomes are allowed to be up to 3 stories (35 feet), and apartments up to 5 stories (50 feet).

**Exhibit 2.5-5. Alternative 2, Preferred: Expected Housing Units**

	Single family homes	Townhomes	Multifamily homes or other*	Lindsay Subarea
<b>Pending Project Area</b>	167 (38%)	0 (0%)	0 (0%)	167 (38%)
<b>Future Development Area</b>	138 (32%)	87 (20%)	44 (10%)	269 (62%)
<b>Subarea Total</b>	<b>305 (70%)</b>	<b>87 (20%)</b>	<b>44 (10%)</b>	<b>436</b>

	Single family homes	Townhomes	Multifamily homes or other <sup>1</sup>	Total
<b>Pending Project Area</b>	224 (51%)	0 (0%)	0 (0%)	<b>224 (51%)</b>
<b>Future Development Area<sup>2</sup></b>	81 (19%)	87 (20%)	44 (10%)	<b>212 (49%)</b>
<b>Lindsay Subarea</b>	<b>305 (70%)</b>	<b>87 (20%)</b>	<b>44 (10%)</b>	<b>436</b>

Gross area (acres)	<b>87.5</b>
Gross density (units per acre)	<b>5.0</b>
Pending Project Area gross area (acres)	48.2
Pending Project Area gross density (units per acre)	4.6
Future Development Area gross area (acres)	39.3
Future Development Area gross density (units per acre)	5.4

1. Mixed-use, small commercial, and ADUs are allowed, but not included in draft proposal.  
 2. Example land use mix meeting AMC 20.44.032 and aligning with Pending Project Area development. Additional housing types not explicitly mentioned in the chart (e.g., duplexes, triplexes, stacked flats) would also be allowed.

Note: Housing units chart replaced; the Preferred Alternative includes a larger Pending Project Area than the Draft EIS's Alternative 2, resulting in more units counted in the Pending Project Area.  
 Source: Land Technologies, MAKERS, 2025.

**Exhibit 2.5-6. Alternative 2, Preferred: Proposed Housing**

	Existing	Net New	Total
<b>Housing Units</b>	17	419	<b>436</b>

Source: Land Technologies, 2025; MAKERS, 2025.

The Preferred Alternative achieves a minimum residential density of approximately 5 units per gross acre (see Exhibit 2.5-5). The Pending Project Area is anticipated to develop similarly to the layout shown in Exhibit 2.5-3, while the Future Development Area’s site plan is not determined. The Preferred Alternative’s Future Development Area achieves a residential density of 5.4 units per gross acre, or 11 units per gross buildable acre (excludes critical areas, buffers, and easements), and the layout, housing types, and opportunity for small commercial is flexible.

**Exhibit 2.5-7. Alternative 2: Proposal, Preferred – Future Development Area Residential Density**

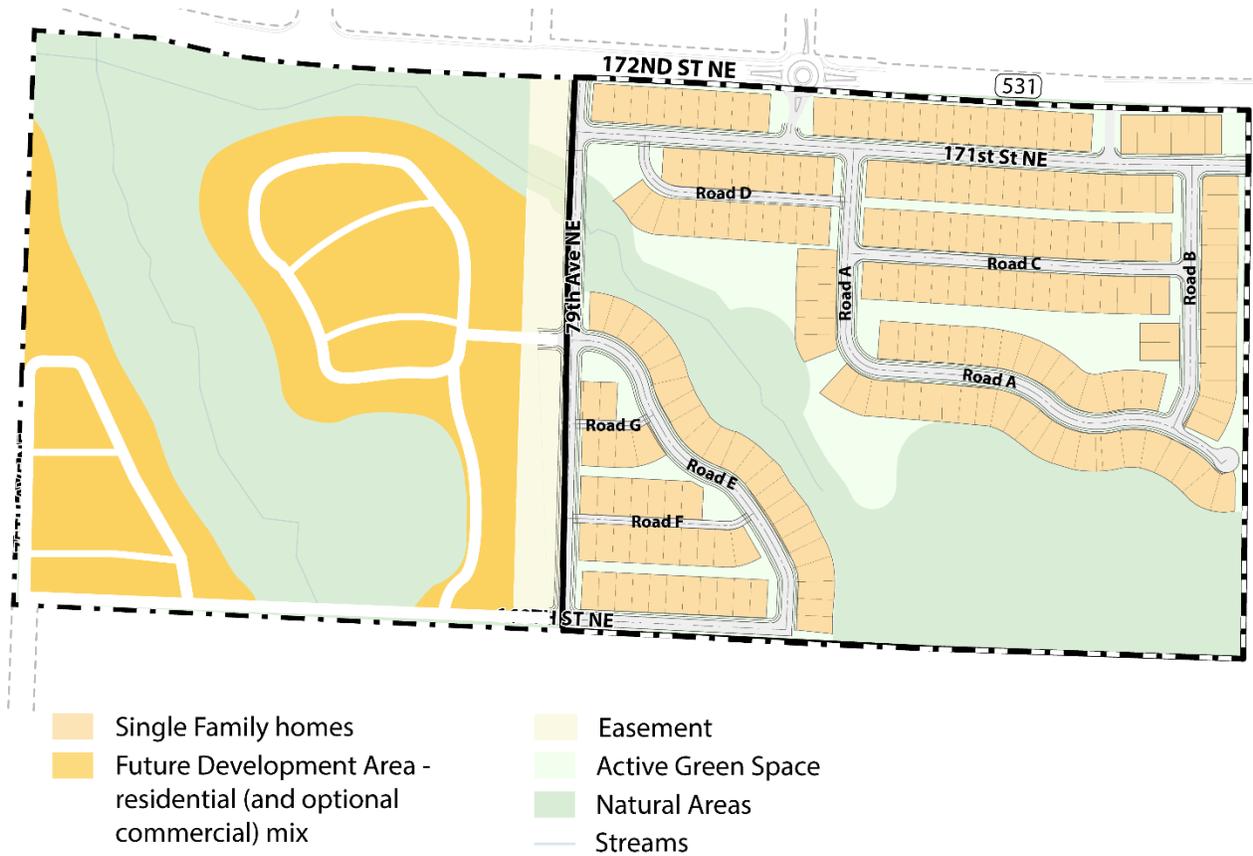
<b>Future Development Area Minimum Residential Density</b>	
Future Development Area gross area (acres)	39
Unbuildable land - critical areas, buffers, and easements (acres)	20
Gross buildable land (acres)	19
<b>Residential Density</b>	<b>11</b>
Expected units/gross buildable land acres (units/acre)	

Note: If development in the Pending Project Area does not occur as expected, the subarea-wide minimum gross density and land use mix requirements would continue to apply. Development may be configured across the full subarea differently than displayed in the example site plan.

Source: Land Technologies, 2025

Though the proposal does not address commercial uses, the [AMC 20.44.032](#) allows for a small portion of mixed-use, small commercial, and accessory dwelling units (ADUs), which could be included in the Future Development Area. Home Occupations are allowed in every residential home or unit by code.

**Exhibit 2.5-8. Alternative 2, Preferred: Housing Types**



Note: The types of developments may be updated in future phases, provided that the intent for land uses under AMC 20.44.032 is maintained. The Future Development Area site plan is shown as an example.

Source: Land Technologies, MAKERS, 2025

Housing types are envisioned to be similar to the examples shown in Exhibit 2.5-7.

**Exhibit 2.5-9. Housing type examples**



Source: Land Technologies, MAKERS, 2025

## Parks and Open Space

Housing would be organized around two open space corridors that follow the Edgecomb Creek tributaries, and parks and trails would be interspersed throughout the development. The parks and open space plan features include:

- Several active green spaces (see illustrations in Exhibit 2.5-8), including shared common open spaces between buildings and parks facing the natural open space corridors, some of which double as stormwater vaults
- A planned trail system connecting sidewalks and open spaces
- A preserved wooded wetland in the southeast corner
- Restoration of other wetlands and the historic Edgecomb Creek (canyon on the west side of the subarea)

Exhibit 2.5-10. Open Space and Trails



Note: The types of developments may be updated in future phases, provided that the intent for land uses under AMC 20.44.032 is maintained. The Future Development Area site plan is shown as an example and would be updated to meet critical area requirements.

Source: Land Technologies, MAKERS, 2025

Approximately 12% of the site would be designated as active green space and trails, exceeding the [AMC 20.44.032](#) requirement for 10% of the non-Native Growth Protection Area (NGPA) site area to be recreation, open space, and trails. The NGPA would account for 30% of the site.

**Exhibit 2.5-11. Recreational Facilities, Open Space, and Trail System**

	Area (sf)	% of Gross
<b>Total Lindsay Subarea Gross Area</b>	<b>3,810,914</b>	
<b>Required Open Space</b> (10% of (gross area minus NGPA))	<b>268,223</b>	
Native Growth Protection Areas (NGPA)	1,128,685	30%
Open Space	142,307	4%
Parks: Storm Management, Recreation Areas	462,564	<b>12%</b>
<b>Pending Project Area</b>		
NGPA	337,425	9%
Open Space	35,530	1%
Parks: Storm Management, Recreation Areas	115,192	3%
<b>Future Development Area</b>		
NGPA	791,260	21%
Open Space	106,777	3%
Parks: Storm Management, Recreation Areas	348,372	9%

	Area (sf)	% of Gross
<b>Total Lindsay Subarea Gross Area</b>	<b>3,810,914</b>	
<b>Required Open Space</b> (10% of (gross area minus NGPA))	<b>268,223</b>	
Native Growth Protection Areas (NGPA)	1,128,685	30%
Open Space	108,244	3%
Parks: Storm Management, Recreation Areas	470,776	<b>12%</b>
<b>Pending Project Area</b>		
NGPA	337,425	9%
Open Space	43,834	1%
Parks: Storm Management, Recreation Areas	122,426	3%
<b>Future Development Area</b>		

	Area (sf)	% of Gross
NGPA	791,258	21%
Open Space <sup>1</sup>	64,410	3%
Parks: Storm Management, Recreation Areas <sup>1</sup>	348,350	9%

1. Example of open space and parks dedication to meet [AMC 20.44.032](#)

**Exhibit 2.5-12. Shared Open Space Illustrations**



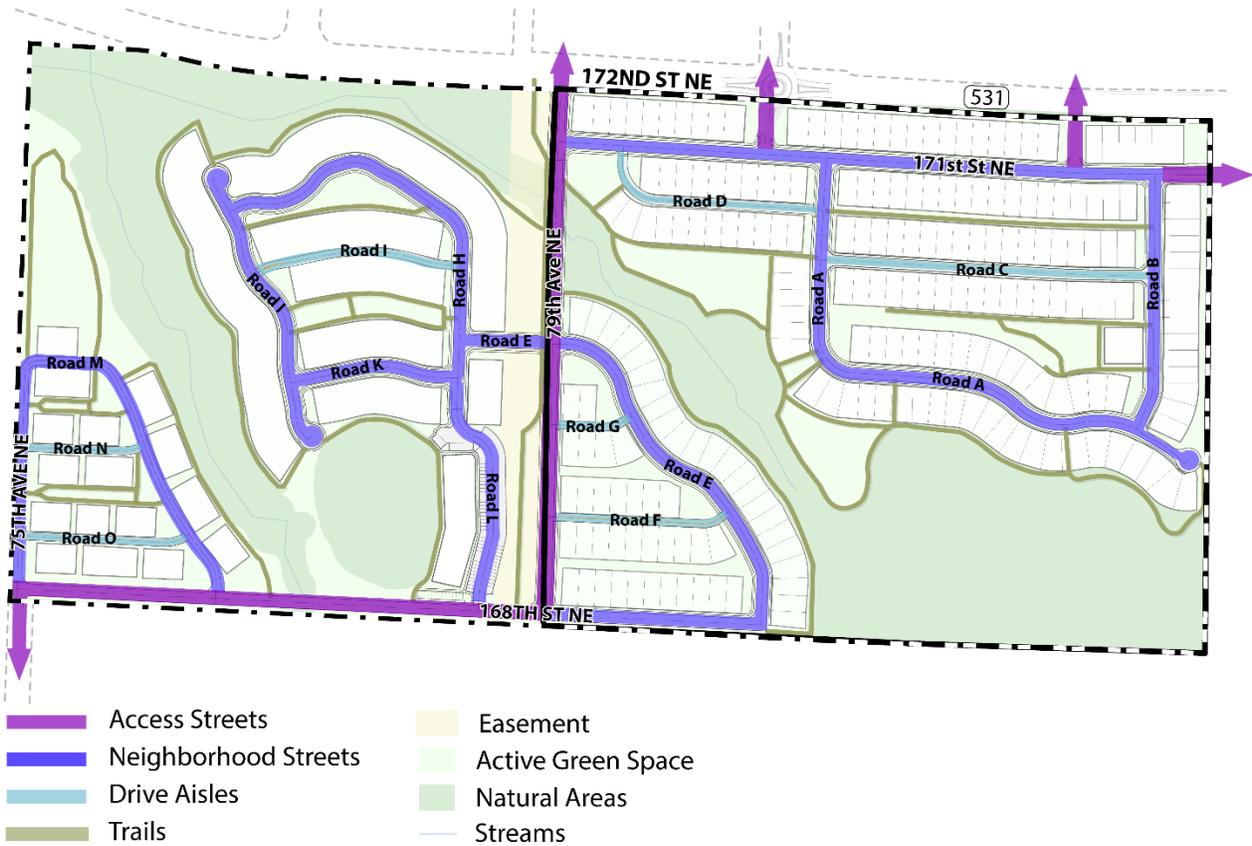
Sources: Land Technologies, 2025

**Transportation**

The proposed street system includes a north-south connection—79<sup>th</sup> Ave NE—and east-west connections (non-continuous because of the stream) approximately 176 ft, 670 ft, and 1,330 ft south of SR 531 (172<sup>nd</sup> St NE). All streets and alleys would comply with complete streets principles and would follow appropriate street guidance, such as [NACTO](#) Neighborhood Street, Yield Street, Residential Shared Street, or Green Alley. Within the smaller areas, a trail network would provide connections for people walking, biking, and rolling (i.e., wheelchair, scooter) at shorter intervals.

The developer and/or City would install a roundabout at 80<sup>th</sup> Dr NE, depending on timing of development, and the developer would improve SR 531 (172<sup>nd</sup> St NE) along the Subarea.

Exhibit 2.5-13. Alternative 2, Preferred: Street Types



Note: The types of developments may be updated in future phases, provided that the intent for land uses under AMC 20.44.032 is maintained. The Future Development Area site plan is shown as an example and would be updated to meet critical area requirements.

Source: Land Technologies, MAKERS, 2025

**Exhibit 2.5-14. Street type examples**



Source: Land Technologies, MAKERS, 2025

# **3 AFFECTED ENVIRONMENT, IMPACTS, & MITIGATION MEASURES**

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

- Section 3.1 Land Use
- Section 3.2 Natural Environment
- Section 3.3 Transportation
- Section 3.4 Public Services
- 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 and Urban Form

### 3.1.1 Affected Environment

#### Existing Land Use Plans

##### City and Regional Planning Framework

The table below summarizes pertinent city and regional plans and policies, that guide land use and development for the Lindsay Subarea Plan. Plans, policies, and code addressed include:

- Puget Sound Regional Council (PSRC) VISION 2050, adopted in 2020, contains multicounty planning policies for King, Pierce, and Snohomish Counties and a Regional Growth Strategy for the three counties as well as Kitsap County.
- Snohomish Countywide Planning Policies (CPP) adopted in 2011 that guide local government Comprehensive Plans including subarea plans that are elements of them.
- Arlington Comprehensive Plan, Arlington in Motion 2024 & Beyond, adopted in 2024, that identifies a vision, land use concept, and policies guiding decisions for future growth and development.

### Exhibit 3.1-1. Summary of City and Regional Planning Framework

Planning Framework	
<b>Growth Strategy &amp; Development Pattern</b>	<p>Accommodate future growth in alignment with the PSRC Regional Growth Strategy by encouraging the development of walkable, healthy, and equitable communities, while preserving rural and resource lands and fostering a strong sense of community</p> <p>Vision 2050: Regional Growth Strategy Goal, MPP-RGS-6, Development Pattern Goal; Snohomish CPP: Development Pattern Goal; Arlington 2024 &amp; Beyond: LU-1, LU-8, and LU-10</p>
<b>Housing</b>	<p>Expand the housing stock to provide equitable access to affordable, diverse housing options that meet the needs of all income levels and demographic groups. Support the development of mixed-income neighborhoods strategically located near jobs, essential services, and transit to promote accessibility and inclusivity.</p> <p>Vision 2050: Housing Goal, MPP-H-2, and MPP-H-7; Snohomish CPP: Housing Goal and CPP-HO-2; Arlington 2024 &amp; Beyond: H-1, H-2, and H-5</p>
<b>Connectivity</b>	<p>Promote safe, convenient movement of people, goods, and services through a well-connected multimodal transportation system that enhances both regional and local connectivity and supports economic growth. Encourage healthier, more sustainable travel options by expanding transit access and investing in active transportation infrastructure for people of all ages and abilities.</p> <p>Vision 2050: Transportation Goal, MPP-T-8, and MPP-T-14; Snohomish CPP: Transportation Goal and CPP-TR-4; Arlington 2024 &amp; Beyond: T-13 and T-15</p>
<b>Parks &amp; Recreation</b>	<p>Develop high-quality parks, trails, and open spaces that promote healthy and active lifestyles, while supporting environmental stewardship by thoughtfully locating recreational facilities to enhance and complement natural site features.</p> <p>Vision 2050: MPP-En-15; Snohomish CPP: CPP-Env-2; Arlington 2024 &amp; Beyond: E-1, E-5, P-1, P-5 and P-6. Refer to Public Services for the Parks and Recreation Master Plan.</p>

### Airport Protection Subdistrict

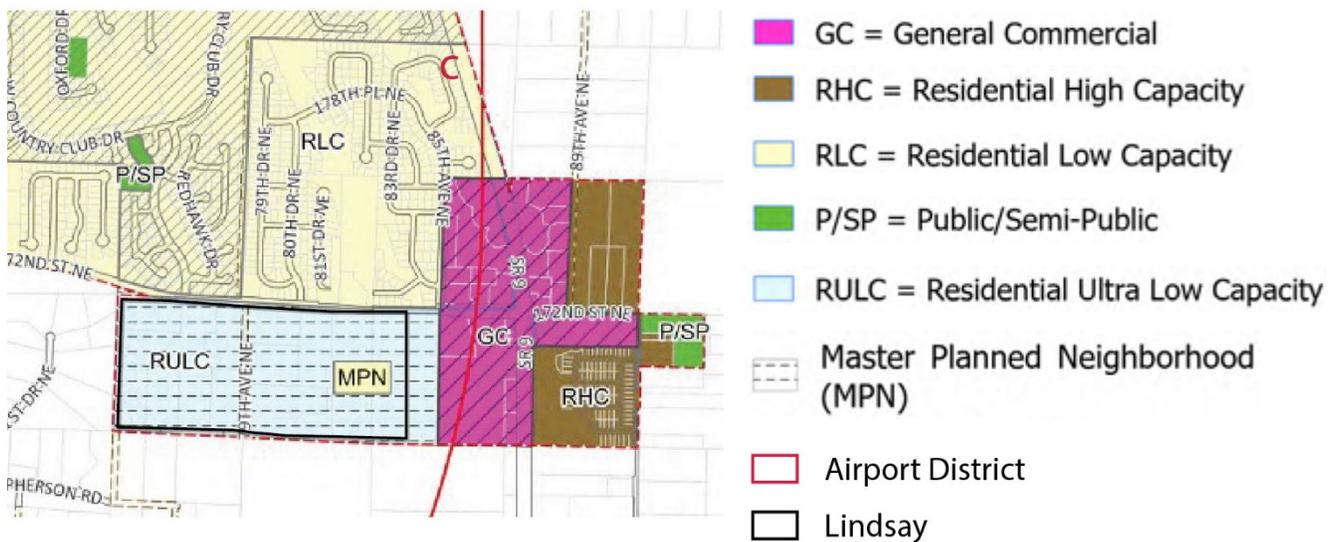
The majority of Lindsay lies within the Airport Protection Subdistrict C (See Exhibit 3.1-2), which restricts uses that would interfere with airport and flight operations, limits building/structure heights to 166 feet, deters uses that increase bird impact problems, and does not limit residential or employment intensities.

## Land Use/Zoning

Lindsay’s current land uses are predominantly low-density residential. Single-family houses and some barns are interspersed within open fields, wetlands, streams, and forested areas. Its existing development pattern is consistent with Snohomish County’s rural residential areas that sometimes include agriculture.

In 2022, Lindsay was annexed into the Hilltop Subarea under AMC 20.44.032, following the sewer plant expansion that enabled service to the area. As part of the adoption, the City proposed a zoning designation of Residential Ultra Low Capacity (RULC) with a Master Planned Neighborhood (MPN) overlay to support the goals of the Growth Management Act. See Exhibit 3.1-2. Lindsay Zoning Map.

**Exhibit 3.1-2. Lindsay Zoning Map**



Source: City of Arlington, MAKERS 2025

RULC allows for 1-4 dwelling units per acre and primarily accommodates single-family homes on large lots, 9,600 square feet or more, and permitted building height up to 35’, or three stories tall (See Exhibit 3.1-3). The intent of the MPN overlay is to promote a more coordinated, efficient, and effective land development. Section 2.3.2 AMC 20.44.032 Subarea Plans provide more details about the specific policies and criteria to meet the provisions of [AMC 20.44.032 Subarea Plans](#) for MPN designated areas.

**Exhibit 3.1-3. RULC Density and Dimension Standards**

Zone			Residential Ultra Low Capacity
Minimum Lot Size (square feet)			9,600 or larger
Minimum Residential Densities			1-4 Du/AC
Minimum Lot Width (feet)			70
Building Setback Requirements - Minimum Distance, in feet from:	Non-Arterial Street Right of Way Line	Building	25
		Freestanding Sign	10
	Arterial Street Right of Way Line	Building	40
		Freestanding Sign	10
	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)			35
Max. Lot Coverage (%)			35

Source: AMC Chapter 20.48 Density and Dimensional Regulations.

## Housing Capacity

The table below presents housing capacity to accommodate growth targets and projected housing needs in Arlington, as analyzed in the Comprehensive Plan and by PSRC. Recognizing Lindsay's redevelopment potential, the City identified the Subarea as a key opportunity area to accommodate housing growth. No significant job growth is anticipated in this area.

To plan proactively, the City has analyzed a higher-end growth scenario in the Comprehensive Plan, reflecting a more aggressive pace of development to accommodate HB 1220 (housing needs by income) requirement and to concentrate growth near Manufacturing/Industrial Centers (MIC) and high-capacity transit stations. As a result, the

City’s Comprehensive Plan’s estimated housing capacity across the City is higher than PSRC’s estimates.

Under the Comprehensive Plan, the City planned for the Lindsay Subarea to see about 85 net new housing units, for a total of 102 housing units, and significant growth within the broader Hilltop area, especially the southeastern corner.

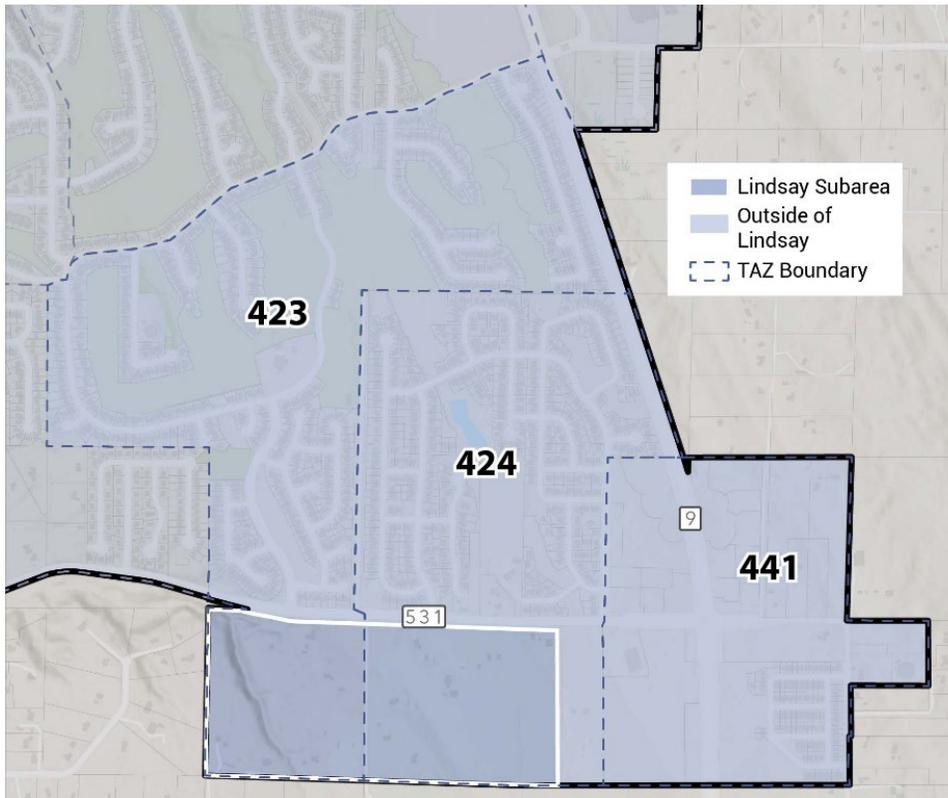
The PSRC growth target is not an alternative to be analyzed in this EIS, but included for information purposes only. In the Lindsay Subarea, it closely aligns with the intent for a subarea plan developed under the City’s Master Planned Neighborhood Overlay regulations, rather than the underlying ultra-low intensity residential zoning.

Lindsay is part of the broader Hilltop geographic area—Traffic Analysis Zones (TAZs) 423, 424, and 441—for which housing capacity is modeled (see Exhibit 3.1-5). Two TAZs extend beyond the Lindsay Subarea boundary, and the southeastern TAZ is critical to the Hilltop area as a whole, so the “Outside of Lindsay” area shows the housing capacity for that larger area excluding Lindsay.

**Exhibit 3.1-4. Lindsay’s 2044 Comprehensive Plan and PSRC Housing Capacity**

	Existing	Net New Housing 2044		Total Housing Units 2044	
		Comprehensive Plan	PSRC <sup>1</sup>	Comprehensive Plan	PSRC <sup>1</sup>
<b>Lindsay</b>					
TAZ 423	9	34	242	43	251
TAZ 424	8	51	239	59	247
<b>Subtotal</b>	<b>17</b>	<b>85</b>	<b>480</b>	<b>102</b>	<b>497</b>
<b>Outside of Lindsay</b>					
TAZ 423	542	-	-	542	542
TAZ 424	382	20	20	402	402
TAZ 441	92	1,916	466	2,008	588
<b>Subtotal</b>	<b>1,016</b>	<b>1,936</b>	<b>486</b>	<b>2,952</b>	<b>1,502</b>
<b>Total</b>	<b>1,033</b>	<b>2,021</b>	<b>966</b>	<b>3,054</b>	<b>1,999</b>

<sup>1</sup> PSRC targets are included only for informational purposes.  
Source: Comprehensive Plan Land Use Forecasts

**Exhibit 3.1-5. Lindsay Subarea Full TAZs Map**

Source: MAKERS, 2025

## Aesthetics/Urban Form

Lindsay's character is shaped by its prior unincorporated Snohomish County rural residential zoning and agricultural legacy. The area maintains a rural character defined by low-density residential development, large open fields, and natural areas like forests and wetlands. Existing single-family homes are located on large lots and are typically set far back from the road, resulting in no or limited build-to-street relationship.

This area is largely car-dependent, with limited pedestrian pathways, bicycle infrastructure, and transit. Roads serving homes in Lindsay lack sidewalks, and other than SR 531 (172<sup>nd</sup> St NE), are unpaved and lack street lighting.

## Current Adjacent Land Use Pattern

To the west and south, the Subarea is bordered by unincorporated Snohomish County rural residential lands, forested lands with a similar low density residential development pattern as within Lindsay. To the east is the property owned by the Stillaguamish Tribe, which is largely an undeveloped open space.

There are existing subdivisions to the north, including Gleneagle and Northern Hilltop. These neighborhoods typically feature two-story single-family homes on lot sizes ranging from 7,000 to 8,000 square feet. Small parks and a golf course are interwoven into the neighborhood.

The subdivisions are screened from SR 531 (172<sup>nd</sup> St NE) with fences and street trees. Sidewalks along SR 531 (172<sup>nd</sup> St NE) are limited and exist only where adjacent to these subdivision developments, resulting in a sporadic and fragmented sidewalk network.

## Housing

As shown in Exhibit 3.1-4, there are currently 17 housing units in Lindsay, all of which are single-family homes situated on spacious lots consistent with the area's low-density, rural development pattern. For over two decades, there has been no residential development in the Subarea.

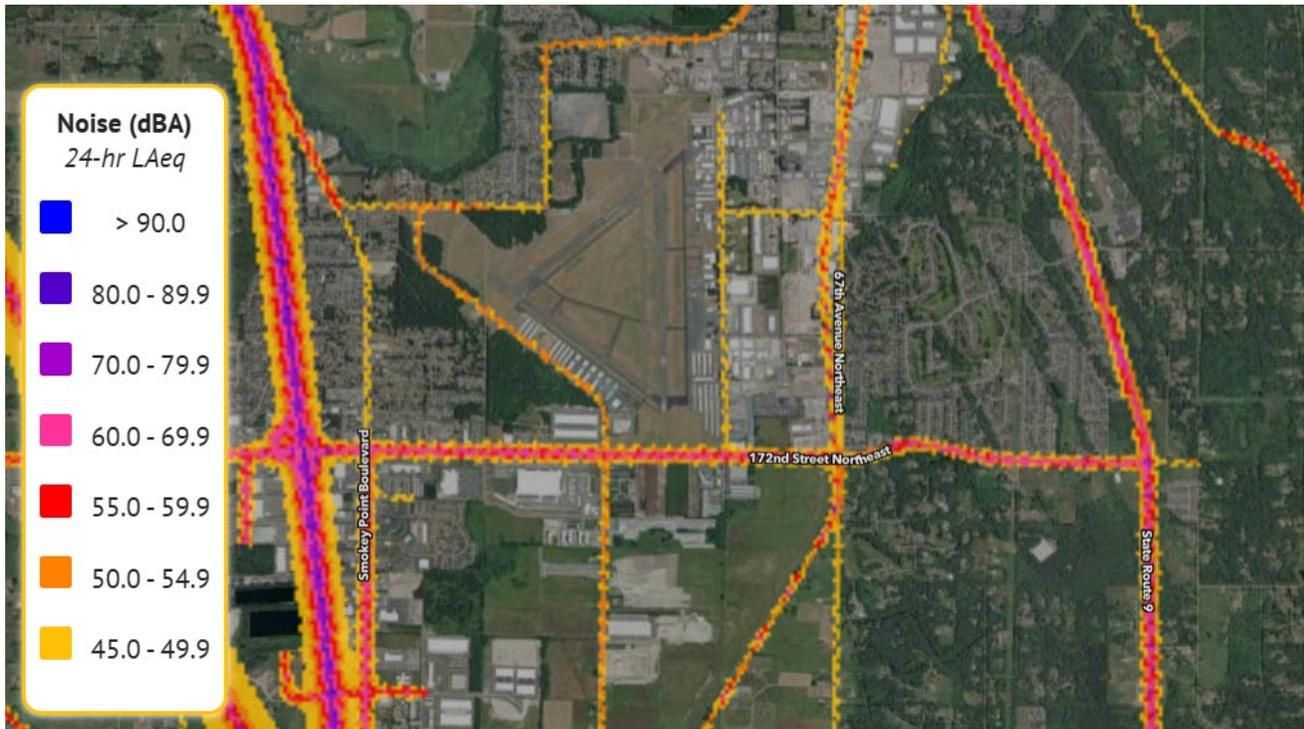
## Noise

Noise sources in and near Lindsay include typical neighborhood sounds, such as lawn equipment, children playing, car horns, sirens, and music played outdoors; roadway-related noise from vehicles' tires hitting pavement and engine sounds, especially along SR 531 (172<sup>nd</sup> St NE); Arlington Municipal Airport-related air traffic noise; an indoor shooting range east of Lindsay; and a chicken farm south of Lindsay. Aircraft follow standard National Business Aircraft Association noise abatement procedures and are asked to be aware of noise sensitive areas.

**AMC 20.44.210 – Noise**, pursuant to **WAC Chapter 173-60**, limits the maximum permissible noise level within a residential zone to 55 dBA, with limits reduced by 10 dBA between the hours of 10:00pm and 7:00am. Louder intermittent sounds are allowed with limits on their time (1.5 to 15 minutes depending on volume) in a one-hour period. Sounds generated from temporary construction sites as a result of construction activity are exempt from this provision between the hours of 7:00am and 10:00pm, or when conducted beyond 1,000 feet from any residence. Motor vehicle and aircraft noise follow separate rules.

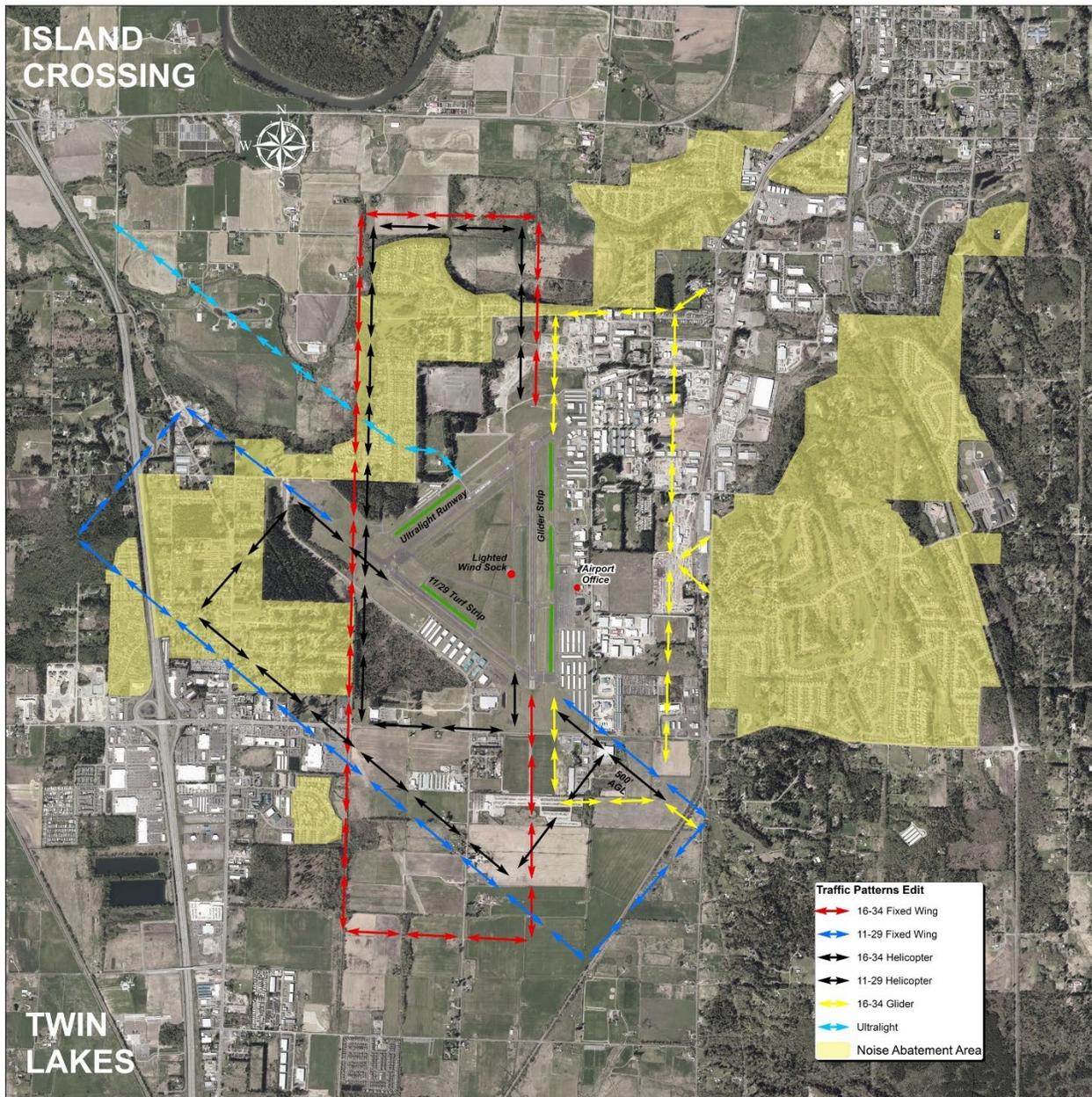
**AMC Chapter 9 – Peace, Morals and Safety** and **AMC Chapter 7 – Nuisances** provide additional guidelines regarding allowable noise, violations, and exemptions. Noise must not rise to the level of public nuisance that disturbs a community or neighborhood. Variances may be approved subject to City approval. Homeowners' associations may also enforce supplemental regulations.

**Exhibit 3.1-6. Noise levels near Lindsay Subarea**



Note: Map includes road and rail-related noise. Aviation noise data is not available.  
Source: National Transportation Noise Map, 2020

Exhibit 3.1-7. Arlington Municipal Airport Traffic Patterns



Source: [Traffic Patterns](#), City of Arlington, 2025

## 3.1.2 Potential Impacts

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.
- **Land use compatibility and City urban form goals.** An increase in potential for incompatible land use transitions or inability to maintain a desirable built environment as defined in the City of Arlington Development Design Standards’ intent statements.
- **Housing:** Meet AMC 20.44.032 Subarea Plans goals to diversify housing options:
  - 70% single-family residential or cottage housing, with a lot size of 3,600-4,500 square feet
  - 20% attached residential, such as town homes, row houses, or duplexes
  - 10% attached dwelling unit, multifamily homes (e.g., garden apartment, fourplex), mixed-use, and/or small commercial

## Impacts Common to All Alternatives

### Relationship to Existing Land Use Plans

The table below outlines the regional and city planning framework and evaluates how well each alternative addresses them within the Subarea. Alternative 1 No Action and Alternative 2 Proposal are consistent with VISION 2050 goals, but Alternative 2 Proposal more effectively advances key priorities such as increasing densities and providing housing options, enhancing multimodal connectivity, and integrating parks and recreation to support development of healthy, connected community.

**Exhibit 3.1-8. Alternatives Consistency with City and Regional Planning Framework**

Planning Framework	Alternative 1: No Action	Alternative 2: Proposal	Notes
<b>Growth Strategy &amp; Development Pattern</b> Accommodate future growth in alignment with the PSRC Regional Growth Strategy by encouraging the development of walkable, healthy, and equitable communities, while preserving rural and resource lands and fostering a strong sense of community	✓	✓+	Alternatives would see residential growth within neighborhoods with nearby amenities and opportunities. Alternative 2 would increase the potential for denser development, improve community connectivity, include updated design standards for walkability, and create gathering spaces such as parks and shared courtyards to strengthen sense of community.

Planning Framework	Alternative 1: No Action	Alternative 2: Proposal	Notes
<p><b>Housing</b> Expand the housing stock to provide equitable access to affordable, diverse housing options that meet the needs of all income levels and demographic groups. Support the development of mixed-income neighborhoods strategically located near jobs, essential services, and transit to promote accessibility and inclusivity.</p>	✓-	✓+	Alternatives support increasing housing stock. Alternative 1 would be unlikely to increase housing type diversity or increase housing stock to the same extent as Alternative 2. Alternative 2 would accommodate planned residential growth and allow a variety of home types.
<p><b>Connectivity</b> Promote safe, convenient movement of people, goods, and services through a well-connected multimodal transportation system that enhances both regional and local connectivity and supports economic growth. Encourage healthier, more sustainable travel options by expanding transit access and investing in active transportation infrastructure for people of all ages and abilities.</p>	✓	✓+	Alternatives would adhere to City “Complete Streets”, “Vision Zero”, and “Safe Routes to School” guidelines to enhance walkability and streetscape. Alternative 2 would connect more residences to active transportation infrastructure and make use of updated street standards.
<p><b>Parks &amp; Recreation</b> Develop high-quality parks, trails, and open spaces that promote healthy and active lifestyles, while supporting environmental stewardship by thoughtfully locating recreational facilities to enhance and complement natural site features.</p>	✓-	✓+	Alternative 2 would increase the potential for publicly accessible parks and recreation while protecting critical areas.
<p>Legend: ✓- = partially meets    ✓ = meets    ✓+ = optimally meets</p>			

## Aesthetics/Urban Form

Housing development is anticipated under all the alternatives, though the scale and mix will vary. These developments will likely lead to noticeable changes in aesthetics, marking a shift in neighborhood character from a rural, pastoral setting to a more developed landscape. This transformation may include an increased presence of built elements such as buildings, roads, and parking areas, as well as landscaped areas, parks, and open space.

### Land Use Compatibility

An increase in residential density (from low to medium) may introduce limited potential for land use transition conflicts, particularly where new development abuts existing rural or lower-density areas. SR 531 (172<sup>nd</sup> St NE) is a wide right-of-way that visually and physically separates Lindsay from Hilltop’s other neighborhoods. Any changes in scale or housing type

across the street would not impact existing development’s solar access, privacy, or other feature of a residential neighborhood, and increased housing type variety may be considered a benefit to the neighborhood.

Lindsay’s other boundaries are surrounded by rural, less developed, mostly wooded land. The protection of critical areas would maintain large open space corridors visually maintaining Lindsay’s place in its ecological setting, and setback standards would prevent development from inappropriately abutting adjacent sites.

**Urban Form Goals**

Both alternatives would adhere to design standards. Any potential impacts would be effectively mitigated through design standards and development regulations that promote high-quality, context-sensitive design.

**Housing**

The City of Arlington recognizes Lindsay Subarea as a key area to accommodate a portion of the City’s growth. In the figures below, the "Existing" reflects housing units as of 2024. Alternative 1 No Action represents Lindsay’s housing capacity analyzed under the Comprehensive Plan. Alternative 2 Proposal supports a more proactive strategy, accommodating more housing units and achieving long-term growth objectives under [AMC 20.44.032 Subarea Plans](#).

**Housing goal.** Increasing housing capacity achieves City and community housing goals like increased affordability and expanded housing choice. Introducing low- to medium- density housing types provide a range of housing options that better align with resident needs at various income levels and life stages. It also supports the creation of more affordable options by reducing pressure on the existing housing stock and providing alternatives to traditional single-family homes.

**Exhibit 3.1-9. Net New Housing Units in 2044 by Alternatives**

	Existing	Net New Housing		Total Housing Units	
		Alternative 1: No Action	Alternative 2: Proposal	Alternative 1: No Action	Alternative 2: Proposal
Lindsay	17	85	419	102	436

Source: Comprehensive Plan Land Use Forecasts, Land Technologies, 2025

## Noise

Under both alternatives, during active construction, noise is expected to be elevated during allowed hours of construction operation (7am to 7pm, Monday through Saturday), and equipment is generally required to use noise suppression.

Increased residential density and small businesses may contribute to higher ambient noise levels, though these would likely generate noise levels comparable to typical residential conditions.

Under both alternatives, traffic volumes are expected to be comparable, with an increase over existing conditions. Traffic-related noise from SR 531 (172<sup>nd</sup> St NE) may increase, though not to an extent that would be considered a significant unavoidable adverse noise impact. The shift to electric and hybrid vehicles may contribute to a reduction in noise pollution, especially at low speeds.

Traffic-related noise may be further reduced by improvements to SR 531 (172<sup>nd</sup> St NE), such as the installation of a landscape buffer and fencing to reduce the perception of noise from roadways and a roundabout, which reduces noise from idling and sudden acceleration. Streets within Lindsay would adhere to the Lindsay design standards, which include relatively narrow streets and traffic calming measures, which result in lower noise volumes from motor vehicles. Indoor space can also be mitigated with noise reduction design and construction techniques, including enhanced insulation and sound-rated windows and doors.

Under both alternatives, more residences would be developed near the Arlington Municipal Airport. This could result in more homes being impacted by aircraft-related noise if flight path guidance does not treat Lindsay as a noise sensitive area.

## Alternative 1: No Action

### Relationship to Existing Land Use Plans

The existing low-density residential zone constrains development feasibility, making it unlikely that the Subarea will meet its expected housing capacity under current conditions. Without strategic land development and supportive policy framework, the Subarea is unlikely to deliver a diverse mix of housing types, multimodal connectivity, and integrated network of parks and recreation.

## Aesthetics/Urban Form

### Land Use Compatibility

If the current trend continues, the Subarea's rural and low-density development pattern would see modest increases in density, with the potential effects described under Impacts Common to All Alternatives.

### Urban Form Goals

Development would likely occur in a piecemeal fashion, resulting in inconsistent urban design strategies to support a more pedestrian-oriented environment and limit opportunities to foster neighborhood identity, cohesion, and walkability. Streetscapes may lack continuity, and the built environment would offer few unifying elements or shared community amenities that could emerge from more coordinated redevelopment.

## Housing

As shown in Exhibit 3.1-4. Lindsay's 2044 Comprehensive Plan and PSRC Housing Capacity , Alternative 1 No Action is projected to add 85 net new housing units and 102 total housing units. The Subarea would not likely meet housing goals without the subarea planning efforts under the Master Planned Neighborhood overlay to reach desired densities and encourage more growth than the existing zoning. Not meeting city and regional growth targets could be considered a significant adverse impact unless the region plans to accommodate population growth elsewhere.

The types of development expected under this alternative would primarily be low-density residential, limiting the potential to provide a broader range of housing choices and affordability levels.

## Noise

No further impacts beyond those common to all are anticipated.

## **Alternative 2: Proposal, Preferred Alternative**

### Relationship to Existing Land Use Plans

Alternative 2 closely aligns with land use goals and policies, particularly those calling for more coordinated, efficient development patterns. It would achieve the intended outcomes of a diverse housing mix in a walkable, well-connected community. This alternative also supports the preservation and enhancements of natural areas. The potential for public-

private partnerships or development agreements under this alternative may encourage infrastructure improvements in the Subarea to occur sooner than under Alternative 1.

## Aesthetics/Urban Form

### Land Use Compatibility

The predominant proposed land use consists of up to 3-story (35 feet) single-family homes, maintaining a residential scale similar to the northern neighborhoods. Low to medium-density housing, including townhomes (up to 3 stories or 35 feet) and multifamily homes (up to 5 stories or 50 feet), is proposed to be situated away from SR 531 (172<sup>nd</sup> St NE), which helps minimize the perceived intensity of change in residential scale and supports a more gradual transition from existing lower-density neighborhoods. Even if plans change and more intense development occurs close to 172<sup>nd</sup> St NE, the road provides a wide area to transition from a more intense scale to a lower scale, and taller buildings would complement the scale of the wide right-of-way.

As noted in Section 3.1.2, Impacts Common to All Alternatives, any compatibility impacts on Lindsay's other borders would be mitigated through the preservation of open space corridors, effectively nestling residential development within the rural landscape, proposed development standards (e.g., setbacks), and Lindsay-specific design standards, promoting compatibility and continuity with surrounding land uses.

### Urban Form Goals

A combination of citywide and Lindsay-specific design standards—described in Section 3.1.3 Incorporated Plan Features—would be applied to the area, encouraging development to meet citywide urban form goals. Residential buildings would feature active fronts with porches or stoops and landscaping enhancing visual appeal and encouraging informal interaction between residents. Shared amenities like common open spaces, parks, and trails contribute to a cohesive urban form that promotes a welcoming neighborhood atmosphere.

A finer-grained street network and enhanced streetscape improve connectivity, enabling Lindsay to physically and visually integrate with the existing neighborhoods. This fosters a connected Hilltop community while strengthening Lindsay's neighborhood identity and sense of place.

## Housing

Alternative 2 is projected to add 419 net new housing units and a total of 436 housing units to the Subarea, significantly expanding the housing stock compared to Alternative 1. This added capacity would support the City's housing targets and help accommodate anticipated population growth.

The alternative introduces a broader mix of housing types including single-family homes, townhomes, and multifamily homes, which offer greater housing choice for residents across a range of income levels, life stages, and household sizes. Alternative 2 supports key community goals related to housing affordability and accessibility.

## Noise

Development under Alternative 2 would likely include more residential development than Alternative 1. This may result in noise over longer construction periods and following construction, a modest increase in noise from typical residential activity. These increases are expected to remain within levels typical of urban residential environments and are not anticipated to create significant adverse impacts.

More people would live near the airport, but the airport’s flight guidance suggests avoiding impacts to sensitive noise areas, including residential zones. Guidance could be clarified to explicitly include the Lindsay Subarea and a Noise Abatement Area.

# 3.1.3 Mitigation Strategies

## Incorporated Plan Features

The Subarea Plan includes a range of strategies to enhance the feasibility of residential development and encourage a high quality urban form. These measures include:

- Development regulations to reduce barriers to desired housing types and support a diverse mix of ownership and rental options. See Exhibit 3.1-10.
- Design standards for livability and wellbeing with a focus of people-oriented development (e.g., pedestrian -friendly streetscape, “eyes on the street” approach).
- Investment in streetscape and roadway infrastructure to enhance the functionality, resilience, and visual appeal of the public realm.

**Exhibit 3.1-10. Lindsay Development Standards**

Single-family or cottage housing	
<b>Minimum Lot Size</b>	3,600 square feet
<b>Maximum Lot Size</b>	4,500 square feet
<b>Minimum Lot Width</b>	30 feet
Single-family houses, cottage housing, or townhouses	
<b>Maximum Height</b>	35 feet
<b>Building Setbacks</b>	Front - minimum: 10 feet*

Front - maximum: 15 feet (greater distance allowed if lot shaped requires it)  
 Side - minimum: 5 feet  
 Rear Loaded Rear Setback from sidewalk or drive aisle paving edge if no sidewalk:  
 ■ Garage: 2-5 feet or 20-22 feet, or  
 ■ Surface parking only: 20' minimum if parking is perpendicular to drive aisle, or 10' if parking is parallel to drive aisle  
 Front Loaded Rear Setback: 10 feet minimum  
 Projections: Roof overhangs, fireplace projections, and bay and box windows are allowed to project up to 18" inches into the setbacks

**Parking Orientation**

Drive aisles are strongly encouraged. When drive aisles are present, parking must be accessed from the drive aisle. Otherwise, front-loaded parking is allowed.

**Impervious Coverage**

Refer to setback and stormwater manual for initial development. For redevelopment, impervious surface area may not increase by more than 10%.

**Apartments, mixed use, or small commercial**

**Maximum height**

50 feet

**Building Setbacks**

Front - minimum: 5 feet\*

Side - minimum: 5 feet

Rear: 10 feet

**Parking Orientation**

Allow parking areas and lots between a residence and the street only as an exception, when a building is intended to orient toward a park, trail, or common open space.

**Commercial Size**

Maximum: 2,000 square feet

**Impervious Coverage**

Refer to setback and stormwater manual for initial development. For redevelopment, impervious surface area may not increase by more than 10%.

\* Porches are allowed within the front setback up to 5' from the property line.

- **Lindsay Design Standards** supplement the **Arlington Development Design Standards**, which provide citywide baseline guidance to ensure consistent, high-quality building design. The Lindsay Design Standards reinforce the community's vision and ensure that new development meets desired design outcomes within the Subarea. Recommended changes are noted in Exhibit 3.1-11.

**Exhibit 3.1-11. Lindsay Design Standards Overview**

Citywide Development Design Standards		Subarea Plan Reference	Relevant Codes
<b>Street Character and Liveliness</b>			
Inhabited Streets	<input type="radio"/>	Pedestrian-Oriented Façade	
<b>Pedestrian Environment</b>			
Access to Buildings from the Street	<input checked="" type="checkbox"/>		
Screening Blank Walls and Retaining Walls	<input type="radio"/>	Pedestrian-Oriented Façade	
Service Element Screening	<input checked="" type="checkbox"/>		
Screening Parking Lots	<input checked="" type="checkbox"/>		
Screening Parking Garages	<input checked="" type="checkbox"/>		
Parking Garage Entries and Driveways	<input type="radio"/>	Vehicular Entrances and Driveways	
Lighting Design	<input type="radio"/>	Lighting	
<b>Landscape Design</b>			
Continuity Along the Street	<input checked="" type="checkbox"/>		
Parking Lots	<input checked="" type="checkbox"/>		
Trees	★	Trees	20.76.124 Shade Trees on Lots and 20.76.110 Required Trees Along Dedicated Streets
<b>Transition Between Occupied Spaces and Street</b>			
Buffering Private Spaces	<input type="radio"/>	Public to Private Space Transitions	20.46.080 Walls and Fences
<b>Neighborhood Character</b>			
Creating Streetscape Compatibility	<input checked="" type="checkbox"/>		
Orienting the Building to the Street	<input type="radio"/>	Orienting to Public Spaces	
Compatibility within Emerging Centers	<input checked="" type="checkbox"/>		
<b>Adjacent Properties</b>			
Retaining Privacy and Solar Access	<input type="radio"/>	Solar Access	
Parking Adjacent to Residences	<input type="radio"/>	Parking Lots Location	Chapter 20.72 Parking, 20.76.130 Shade Trees in Parking Areas, and 20.76.110 Required Trees Along Dedicated Streets
<b>Siting</b>			

Citywide Development Design Standards	Subarea Plan Reference	Relevant Codes
Creating Usable Open Space	○ Residential Open Space	20.44.032 Subarea Plans and 20.52.030 Residential Usable Open Space
Siting Parking Areas	○ Parking Lots Location Vehicular Entrances and Driveways	Chapter 20.72 Parking, 20.76.130 Shade Trees in Parking Areas, and 20.76.110 Required Trees Along Dedicated Streets
Siting Service Elements	✓	
<b>Transit Facilitation</b>		
Integrating Transit into Site Planning	✓	
Pedestrian Circulation in Multi-Family Complexes	○ Parking Lots Location	Chapter 20.72 Parking, 20.76.130 Shade Trees in Parking Areas, and 20.76.110 Required Trees Along Dedicated Streets
<b>Architecture Character</b>		
Consideration of Site Conditions	✓	
Unifying Design Concept	✓	
Compatibility with Neighborhoods	✓	
<b>Character and Massing</b>		
Articulation and Modulation	✓	
Architectural Scale	✓	
Rooflines	✓	
<b>Architecture Elements</b>		
Human Scale	✓	
Building Features	✓	
Entries	✓	
<b>Exterior Finish Materials</b>		
Appropriate Materials	✓	
<b>Parking Garages</b>		
Compatibility with Occupiable Spaces	✓	
Integration with the Attached Building	✓	
<b>Mixed-Use Buildings</b>		
Site and Building Design	✓	

Legend: ✓ = Applicable citywide Development Design Standard  
 ○ = Refined design standard for the Lindsay Subarea    ★ = New topic for the Lindsay Subarea

- Recommend to incorporate the Lindsay Subarea within the **Noise Abatement Area** mapped on the Arlington Municipal Airport’s [Traffic Patterns](#) Map to encourage flight paths to avoid impacts on Lindsay.
- [AMC 20.76.090](#) Special Screening Requirements for SR 531 (172<sup>nd</sup> St NE), which requires a 30-foot-wide landscape screen is not applied to the Lindsay Subarea. Instead, SR 531 (172<sup>nd</sup> St NE) street design include a buffer and design elements (e.g., trees, shrubs, and residential fences) consistent with Complete Streets, Lindsay Design Standards, and planned improvements. These features are intended to reduce the perception of traffic noise and actual noise levels by slowing vehicles and blocking some sound.

## Regulations and Commitments

State and local laws require new development to meet minimum standards for safety, compatibility, and alignment with adopted infrastructure plans. Applicable regulations are summarized below.

### Development Regulations and Design Standards

- **Title 20 of the Arlington Municipal Code** establishes zoning and development regulations that govern building design, site planning, and strategies to minimize land use conflicts. Proposed changes are noted in Exhibit 3.1-10.
- **Arlington’s [Engineering Standards](#)** regulate street design unless otherwise adjusted within the **Lindsay Street Design Standards**.
- The **Arlington Development Design Standards** provide citywide baseline guidance to ensure consistent, high-quality building design, and are modified by the Lindsay Design Standards as noted in Exhibit 3.1-11.
- See 3.2.3 Natural Environment 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.

### Noise Regulations

- AMC 20.44.210, pursuant to WAC 173-60, prohibits “annoying or disruptive” noise outside of the use and regulates the maximum permissible noise level within residential zones, including the underlying zone RULC.
- AMC Chapter 9 – Peace, Morals and Safety and AMC Chapter 7 – Nuisances provides additional guidelines regarding allowable noise, violations, and exemptions.

- AMC Chapter 20.76 Screening and Trees provides guidance for additional strategies to minimize noise.

## Other Potential Mitigation Measures

Potential mitigation measures include:

- To achieve a greater variety of housing types more quickly, the City might consider incentivizing townhouse and multifamily types in earlier development phases.
- To encourage a walkable community and provide nearby amenities within Hilltop neighborhoods, the City might consider incentivizing small commercial use(s) within Lindsay.

### 3.1.4 Significant Unavoidable Adverse Impacts

Alternative 1 No Action fails to align with adopted growth targets under the Arlington Comprehensive Plan. This is a significant adverse impact unless the City is able to accommodate growth elsewhere. Under Alternative 2 Proposal, with implementation of the planned improvements in the study area and proposed mitigation measures, there would be no significant and unavoidable land use and urban form impacts related solely to the proposal. No noise created by uses in the Lindsay subarea would be considered a significant adverse impact, though clarifying that the airport's Noise Abatement Area includes Lindsay would reduce the chances of noise impacts on Arlington's planned residential areas.

## 3.2 Natural Environment

### 3.2.1 Affected Environment

#### Earth and Water Quality

**Earth.** Topography in the Subarea is rolling, with variable slopes ranging from 1 to 45 percent. The greatest slopes are associated with ravines situated on the western portion of

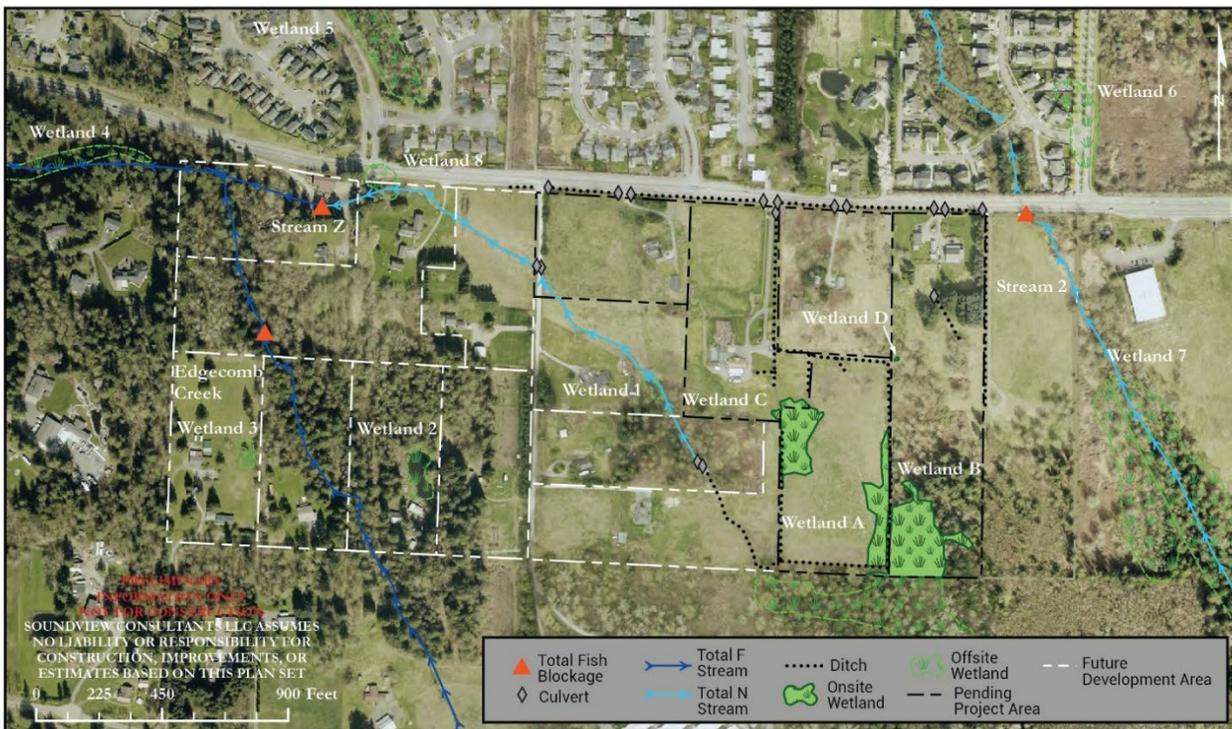
the Subarea. The NRCS soil survey map identify soils within the Subarea as Tokul gravelly loam; however, pockets of siltier soils have been identified in areas coinciding with wetland and streams. The Subarea has no history or indications of unstable soils.

**Wetlands and streams.** Soundview Consultants (SVC) completed a formal site investigation of the approximately 32.28-acre Lindsay’s Pending Project Area (referred to as the “PPA”) in December of 2022 and April of 2024 and identified and delineated four wetlands (Wetlands A-D) and one stream (Stream Z) within the PPA, and identified one wetland (Wetland 1) offsite within 300 feet of the PPA (see Exhibit 3.2-1 ). The results of the assessment are documented in Appendix B *Wetland and Fish and Wildlife Habitat Assessment Report for Lindsay Annexation* dated June 21, 2024 (SVC, 2024a).

Following the formal site investigations within the PPA, SVC completed a desktop study to identify additional potential habitat in the Subarea, including the Future Development Area (referred to as the “FDA”). The desktop study included reviewing online critical area maps and resources, prior studies, topographic maps, and LiDAR imagery to identify potential wetlands, streams, and other fish and wildlife conservation areas. The results of the desktop study preliminarily identified six additional wetlands (Wetlands 2-8) on or within 300 feet of the Subarea, as well as two additional streams (Streams 1 and 2) within the Subarea. The desktop analysis is documented in Appendix C.

Exhibit 3.2-1 identifies the wetlands and streams within and near Lindsay.

**Exhibit 3.2-1. Wetlands and Streams**



Source: Soundview, 2024

Coordination with Tulalip Tribe Biologists has determined that the feature identified as “Stream 1” within the FDA serves as headwaters to Edgecomb Creek. For this analysis, Stream 1 is referred to as “Edgecomb Creek”. Stream Z is an unnamed tributary to Edgecomb Creek and will continue to be referred to as “Stream Z” for the purposes of this document. Stream 2 appears to drain to Tex Lake offsite to the north and then continue north where it eventually outlets to Portage Creek, a tributary to the Stillaguamish River.

Many of the wetlands within the Subarea are situated in degraded landscapes and have been impacted by prior land clearing, mowing, and the encroachment of non-native invasive species. Edgecomb Creek flows through a forested corridor. However, the areas adjacent to Stream Z and Stream 2 appear to be similarly degraded, mowed and/or utilized for agriculture, and lacking native riparian vegetation along much of their lengths within the Subarea.

## Plants and Animals

Upland vegetation throughout the Subarea consists predominantly of pasture grasses with smaller forested and scrub-shrub patches/corridors. Vegetation within the open field areas is largely dominated by creeping buttercup (*Ranunculus repens*), perennial ryegrass (*Lolium perenne*), common velvetgrass (*Holcus lanatus*), common dandelion (*Taraxacum officinale*), and non-native invasive reed canarygrass (*Phalaris arundinacea*). Vegetation within the forested/scrub-shrub areas consists of a mix deciduous and coniferous canopy largely dominated by western red cedar (*Thuja plicata*), Douglas fir (*Pseudotsuga menziesii*), red alder (*Alnus rubra*), and black cottonwood (*Populus balsamifera*), with an understory dominated by osoberry (*Oemleria cerasiformis*), salmonberry (*Rubus spectabilis*), and non-native invasive Himalayan blackberry (*Rubus armeniacus*).

Wetland vegetation throughout the Subarea appears to consist of a mix of emergent and forested/scrub-shrub areas. Wetlands within the disturbed/degraded pastures onsite are largely dominated by soft rush (*Juncus effusus*) and non-native invasive reed canarygrass, while wetlands within the undeveloped patches of forest/shrub areas are dominated by western red cedar, red alder, salmonberry, skunk cabbage (*Lysticium americanum*), youth-on-age (*Tolmiea menziesii*), water parsley (*Oenanthe sarmentosa*), creeping buttercup, water horsetail (*Equisetum arvense*), slough sedge (*Carex obnupta*), and non-native invasive reed canarygrass.

Animals present throughout the Subarea likely consist of typical urban wildlife species including deer, squirrels, crows, songbirds, and other small birds and mammals, as well as aquatic species associated with the identified wetlands and streams throughout the FDA.

The reach of Edgecomb Creek identified within the Subarea is not identified on the DNR Stream Typing map, Snohomish County Streams map, or WDFW and NWIFC-SWIFD. However, onsite investigations completed by SVC and the Tulalip Tribe on parcel 31052600100800 located at the northwest corner of the Subarea identified a natural

defined stream channel within the large ravine that runs from south to north through the western area of the Subarea. These observations combined with additional online desktop assessment confirmed that this reach of channel is the natural headwaters of Edgecomb Creek. Significant improvements have been made to Edgecomb Creek downgradient of the Subarea, including extensive channel relocation and enhancement and stream crossing upgrades meant to improve fish accessibility to the upgradient portions of the stream. The portion of Edgecomb Creek within the Subarea is considered a Type F (fish-habitat-ESA) water due to its physical characteristics, including a channel width of more than 2 feet wide on average and gentle slope. One manmade fish passage barrier was identified on parcel 31052600100300, and could potentially be removed as part of a project-specific mitigation plan to allow for fish passage upgradient to the south.

The majority of the Stream Z reach and Stream 2 have been identified as Type Ns (non-fish habitat, seasonal) waters that do not support fish presence. Natural slope barriers as well as several culverts, some within the study area, currently create total fish passage barriers, precluding fish access to the upper reaches of these streams. A large approximately 200-foot-long elevated culvert is present beneath the gravel machine yard on parcel 31052600100800, which prevents upstream fish passage within Stream Z. Additionally, it is likely that if the 200-foot long culvert were to be removed, a natural fish passage barrier would likely still be present due to the slope and gradient within the channel of Stream Z throughout this portion of the stream. Additionally, upgradient of the large 200-foot-long culvert and Wetland 8, there is a steep approximately 40-foot long vegetated slope with no bed or bank that would prevent fish passage upgradient. Stream Z does transition to Type F (fish-habitat) waters on the northwest corner of the Subarea downgradient of the large culvert on parcel 31052600100800. Additionally, Wetland 4 located outside of the Subarea adjacent to Edgecomb Creek may provide suitable off channel habitat for salmonids during periods of high flows.

## 3.2.2 Potential Impacts

### Impacts Common to All

Under both alternatives, new development will occur within the Subarea. New impacts are anticipated to be universal regardless if the alternative includes increased residential densities and impervious surfaces throughout the Subarea. Additionally, both development plans will likely require road improvements including the expansion of 79<sup>th</sup> Ave NE.

### Earth and Water Quality

Under both alternatives, new development will require grading and increases in impervious surfaces that will affect existing topography and water quality. Areas of rolling topography

will be filled/leveled; however, development activities are generally anticipated to avoid areas potentially containing steep slopes defined/regulated under AMC 20.93.600. Increased runoff and pollutants associated with new impervious surfaces and increased residential density throughout the Subarea will be offset through stormwater infrastructure designed to filter stormwater runoff and maintain existing site drainage patterns and hydrology.

6PPD is a chemical used in the fabrication of automobile tires. As tires wear on the road and in parking lots, they leave micro deposits and small chunks of tire material behind. When 6PPD is exposed to ozone and suspended/dissolved in stormwater it transforms into 6PPD-q, which in 2020 was identified as the chemical responsible for pre-spawn coho salmon mortality events in urban streams. The coho pre-spawn urban runoff associated mortality was known previously as URMS (Urban Runoff Mortality Syndrome) and has been documented since the 1990's throughout the Puget Sound basin in urban and rural areas with direct discharge of transportation system runoff. Since the discovery of the chemical responsible and its effects in 2020, research has been conducted showing that other species of salmonids such as ESA listed Steelhead and Chinook salmon are also sensitive to 6PPD-q, however toxicity thresholds appear to be much lower in coho than other salmonids studied to date. Long term low level or repeated sublethal exposure effects have yet to be evaluated, however preliminary results from toxicity threshold testing show sublethal exposures still result in neurological damage in surviving individuals in both juveniles and adults.

## Plants and Animals

Under both alternatives, new development will require land clearing and the loss of vegetation and habitat within the Subarea. Both alternatives will primarily result in the loss of open field areas degraded due to prior land clearing, ongoing maintenance, and the encroachment of non-native invasive species. Clearing in areas dominated by intact native forest habitat is anticipated to be minor. Alternative 2 Proposal may require additional land clearing and the loss of habitat within vegetated wetland and stream buffers throughout the site due to the extent of encumbrance by critical areas onsite. These impacts will be minimized through the implementation of vegetated corridors and/or minimization measures described in AMC 20.93.830(a) Table 20.93-5 required to implement wetland buffers described in AMC 20.93-4, buffer averaging described in AMC 20.93.320 to reduce wetland and stream buffers at select locations while avoiding the loss of protective buffer area onsite, and by limiting development in buffers to those allowed uses described in AMC 20.93.720 and 20.93.820 to the greatest extent feasible. If impacts beyond what can be accommodated through these allowances are required, they will be treated as permanent buffer impacts or indirect wetland impacts and mitigated as described in Section 0 below.

Both alternatives will result in some level of environmental enhancement due to the requirement to enhance degraded wetland buffers per AMC 20.93.830. It is anticipated that

an existing culvert conveying Stream Z under 79<sup>th</sup> Ave NE will be upgraded to a spanning crossing design as part of required frontage improvements. While this reach of the channel is not accessible to fish due to a slope barrier downgradient, and a large approximately 200-long elevated culvert, the spanning crossing, the replacement of the existing culvert with a spanning crossing will ultimately improve the overall channel habitat and hydrology.

Minimization measures and, where required, protected corridors connecting wetlands to other specified habitats will be incorporated into future development designs to utilize standard buffer widths described in AMC 20.93.830 Table 20.93-4. Furthermore, AMC 20.93.290 requires the establishment of protected critical areas tracts and easements containing critical areas and associated buffers. These measures will result in improved habitat for wildlife and the establishment of protected movement corridors for wildlife.

## **Alternative 1: No Action**

### **Earth and Water Quality**

Under Alternative 1 No Action, fill and grading activities are anticipated to create level ground for development. Exact quantities for earthwork have not been calculated, but it is presumed these quantities would be substantially smaller in scale than what is proposed under the Alternative 2 Proposal. Additionally, under Alternative 1, impervious surfaces will increase throughout the Subarea, resulting in subsequent increases in runoff and pollutants. In general, development activities will be situated away from areas potentially defined/regulated as steep slopes under AMC 20.93.600.

Alternative 1 is expected to retain identified wetlands and streams in their existing condition and adhere to critical area buffers described in AMC 20.93. AMC 20.93.830 describes requirements for prescribed wetland buffers, which may include the enhancement of degraded/unvegetated buffers, and in some cases the incorporation of minimization measures in development design and the establishment of a protected, 100-foot-wide vegetated corridor between wetlands and specified habitats. Per AMC 20.93.830(a)(4), if existing wetland buffers are degraded, increased buffer widths may be utilized in lieu of buffer enhancement. AMC 20.93.730 describes requirements for prescribed stream buffers, which includes the protection of existing native vegetation and the development of a Temporary Erosion and Sedimentation Control Facilities (TESC) Plan to protect stream and stream buffer functions. In addition to adhering to required buffers, as a general condition of development AMC 20.93.290 requires the establishment of critical areas easements or tracts dedicated to the City to protect environmentally critical areas.

The greatest limitations to environmental improvements under Alternative 1 are that (1) low density development will occur over a 20-year period, (2) stream buffers will likely not be enhanced due to there being no requirement to enhance stream buffers under AMC Chapter 20.93, (3) the man made total fish passage barrier located within Edgecomb Creek on

parcel 31052600100300 will likely not be removed, (4) stream channel restoration within the degraded Stream Z will likely not occur due to their being no requirement under AMC Chapter 20.93, (5) wetlands will likely not be enhanced due to there being no requirement for wetland enhancement under AMC Chapter 20.93, and (6) environmental enhancements and protections will be implemented slowly over 20-year period. Further, AMC 20.93.730 does not include requirements for stream buffer enhancement, and it is presumed that Alternative 1 will not provide additional improvements beyond what is required in the City's code as all stream buffer requirements will be met.

In general, increased runoff and pollutants associated with increases in impervious surfaces and residential use of the Subarea will be offset through the implementation of stormwater infrastructure designed to collect and treat runoff before dispersing to buffers in order to maintain existing site drainage patterns and hydrology. Additionally, wetland buffer enhancement actions will provide increase plant densities which will provide additional structure to filter pollutants and sediments from runoff entering the identified streams. However, under Alternative 1 it is expected that enhancement measures will be implemented slowly over time and be smaller in scale than what will be achieved under Alternative 2.

## Plants and Animals

Alternative 1 may require impacts to existing plant communities and habitat in order to accommodate development. Some environmental improvements are anticipated under Alternative 1, as degraded wetland buffers may require enhancement under AMC 20.93.830, and AMC 20.93.290 requires the establishment of critical areas easements or tracts to protect environmentally critical areas as a condition of development, which will in turn establish protected wildlife movement corridors. However, as noted above, AMC Chapter 20.93 does not require the enhancement of degraded stream buffers, stream channel restoration, removal of manmade fish passage barriers, or wetland enhancement. No enhancement of habitat areas outside of wetland buffers is assumed or required under Alternative 1. The establishment of contiguous critical area easements or tracts will occur under Alternative 1.

Alternative 1 is also anticipated to allow the existing residential development to stay in place. Several of these developments appear to be located within wetland and/or stream buffers, indicating non-conforming land uses. Residential structures and impervious surfaces located in close proximity to these critical areas can all have degrading effects on these features. Furthermore, the current landscape within many of the critical areas, their buffer, and the adjacent uplands are degraded by mowing, agricultural land uses, and non-native species. These factors all contribute to degraded water quality and habitat. The current residences utilize onsite septic drain fields which could also have adverse effects on water quality of nearby waters or wetlands. Proposed new development under Alternative 1 would connect into municipal sewer systems, which is potentially

unachievable in areas of the Subarea due to the topography onsite and costs associated with construction of tying into the municipal sewer. However, under this alternative, the development throughout the Subarea will occur slowly over a 20-year period, allowing these ongoing land uses to continue degrading these habitats in the meantime.

## **Alternative 2: Proposal, Preferred Alternative**

### **Earth and Water Quality**

Alternative 2 Proposal includes the development of approximately 305 single family homes, 87 townhomes, and 44 multifamily homes and associated infrastructure including required frontage improvements and site access, landscaping, open space and recreational areas, utilities, and stormwater management facilities in order to meet the goals of the GMA and City of Arlington Comprehensive Plan. Snohomish County's growth targets for the City of Arlington, as outlined in the City's Comprehensive Plan, identify significant increases expected for Arlington employment, population, and housing units between 2020 and 2044. The identified growth targets anticipate a population increase of 15,088 people, an additional 14,462 jobs created, and the construction of 7,913 new housing units between 2020 and 2044. Alternative 2 significantly supports these growth targets through the creation of 436 additional homes in close proximity to areas of increasing employment opportunities, while also providing a net lift in the ecological functions and value to the wetlands and streams identified throughout the Subarea.

To create level ground for development, fill and grading activities and increases in impervious surfaces are anticipated. The Subarea is approximately 87 acres in size, and approximately 69 acres will be disturbed by earthwork, including approximately 4.5 acres of wetland creation and mitigation alone for the Lindsay's Pending Project Area. Over the course of several years, preliminary analyses estimate up to 80,000 cubic yards of surface soil will be stripped and repurposed for landscaping throughout the site. Structural cuts and fills will move approximately 90,000 cubic yards of materials and be balanced such that there are no imports or exports. Approximately 35 percent of the Subarea will be covered by impervious surfaces.

Wetlands and streams are distributed throughout the Subarea, and impacts, including wetland fill, will be necessary and unavoidable to facilitate continued efficient neighborhood growth and to accommodate lot layouts and required infrastructure. Preliminary site plan drawings for the Subarea require the complete fill of Wetlands D and 3, and the partial fill of Wetlands A and C. The proposed wetland fill would result in the complete loss of water quality functions associated with these areas and indirect impacts to wetland areas adjacent to partial fill as these areas will transition to function as buffer.

Additionally, a combination of buffer averaging and reduction and permanent and temporary buffer impacts are anticipated in the buffer areas associated with both wetlands and

streams throughout the Subarea. Wetland buffers described in AMC 20.93.820(a) Table 20.93-4 require the establishment of a 100-foot-wide vegetated corridor for wetland that score six or more points for habitat functions and/or minimization measures outlined in AMC 20.93.820(a) Table 20.93-5 in accordance with AMC 20.93.820(a)(1). Buffer averaging pursuant to AMC 20.93.320 may also be utilized to reduce wetland and stream buffers while avoiding the loss of buffer area onsite. If additional buffer impacts cannot be avoided through buffer reduction and averaging measure, impacts will be treated as permanent buffer impacts or indirect wetland impacts and mitigated as described in Section 0 below. To the greatest extent feasible, permanent buffer impacts will be limited to allowed uses in wetlands and streams/associated buffers described in AMC 20.93.720 and 20.93.820. Furthermore, increases in impervious surfaces and residential capacity throughout the Subarea will increase runoff and pollutants in the landscape.

Additionally, a bridge may be needed in the southwest Future Development Area to cross the Edgecomb Creek headwaters.

These impacts will be offset through a combination of onsite and offsite wetland mitigation, onsite buffer creation, enhancement, and restoration, and the implementation of stormwater management facilities that will collect and treat new runoff prior to dispersing to critical area buffers to maintain existing water quality and quantity. Overall, mitigation measures are anticipated to be designed to achieve a net lift in ecological functions onsite and on a watershed scale. See **Plants and Animals** 0 As new development is largely proposed within the footprint of areas previously impacted by historic land clearing, mowing, and the encroachment of non-native invasive species, impacts to local wildlife will likely be limited to loss of open field habitat and increased noise during construction. Species that rely on these open field habitats are typically disturbance-tolerant species found in more urbanized areas, and that are capable of adapting to human land uses. Construction noise will largely dissuade wildlife from utilizing habitat for the duration of construction. However, in the long term, the proposed development will improve habitat by planting disturbed/degraded areas within critical areas and associated buffers with a dense assortment of native trees, shrubs, and groundcovers (See Section 0 for further details), and connected habitat corridors will be placed in NGPAs to protect these areas from future development. These retained corridors will provide safe movement for local wildlife.

Alternative 2 will remove existing non-conforming land uses within critical areas and/or their buffers that may be resulting in degraded water quality or habitat functions within the wetlands and streams within and downgradient of the Subarea. Termination of the agricultural land uses, transition from onsite septic drain fields to municipal sewer, and proper collection and treatment of stormwater associated with the proposed development is anticipated to result in an overall improvement to water quality leaving the site compared to current conditions. Improved surface water quality leaving the site subsequently improves salmonid habitat in downgradient reaches of Edgecomb Creek.

Mitigation Strategies for more information.

Additionally, under Alternative 2, all degraded stream buffers have the potential to be fully enhanced and or restored through the removal and control of non-native invasive species and the installation of native trees, shrubs, and groundcovers which will significantly improve riparian habitat, increase shading of the stream channels, and help to improve water quality onsite and downgradient of the Subarea. Stream buffer enhancement is not required under AMC Chapter 20-93, and the potential implementation of stream buffer enhancement under Alternative 2 is a significant benefit of Alternative 2 in comparison to Alternative 1.

## Plants and Animals

Alternative 2 will primarily result in the loss of open field/pasture areas dominated by grasses and forbs, and degraded due to the encroachment of non-native invasive species found throughout the surrounding landscape. Some tree and shrub removal will occur; however, these habitat areas largely exist in corridors containing/connecting identified wetlands and streams that will be retained and protected in established NGPAs to protect these areas from future development and fragmentation.

As new development is largely proposed within the footprint of areas previously impacted by historic land clearing, mowing, and the encroachment of non-native invasive species, impacts to local wildlife will likely be limited to loss of open field habitat and increased noise during construction. Species that rely on these open field habitats are typically disturbance-tolerant species found in more urbanized areas, and that are capable of adapting to human land uses. Construction noise will largely dissuade wildlife from utilizing habitat for the duration of construction. However, in the long term, the proposed development will improve habitat by planting disturbed/degraded areas within critical areas and associated buffers with a dense assortment of native trees, shrubs, and groundcovers (See Section 0 for further details), and connected habitat corridors will be placed in NGPAs to protect these areas from future development. These retained corridors will provide safe movement for local wildlife.

Alternative 2 will remove existing non-conforming land uses within critical areas and/or their buffers that may be resulting in degraded water quality or habitat functions within the wetlands and streams within and downgradient of the Subarea. Termination of the agricultural land uses, transition from onsite septic drain fields to municipal sewer, and proper collection and treatment of stormwater associated with the proposed development is anticipated to result in an overall improvement to water quality leaving the site compared to current conditions. Improved surface water quality leaving the site subsequently improves salmonid habitat in downgradient reaches of Edgecomb Creek.

## 3.2.3 Mitigation Strategies

### Incorporated Plan Features

Several features will be incorporated into the development design for the Subarea in order to avoid and minimize impacts to critical areas from the proposed development.

In general, the proposed development will be designed to avoid and minimize critical area impacts to the greatest extent feasible, in accordance with mitigation sequencing required under AMC 20.93, by adhering to the stream and wetland buffer requirements specified in AMC 20.93 (See the Regulations and Commitments section below for further details) and utilizing buffer averaging (AMC 20.93.320) to limit the degree of permanent buffer impacts throughout the site. Standards for wetland buffers described in AMC 20.93.830 require minimization measures specified in AMC Table 20.93-5 and the enhancement of degraded wetland buffers which will be incorporated into project designs. Stream buffer requirements in AMC 20.93.730 do not require buffer enhancements, but do require the retention of native plant communities, which will also be incorporated. Under Alternative 2, degraded stream buffers have the potential to be fully enhanced and or restored through the removal and control of non-native invasive species and the installation of native trees, shrubs, and groundcovers which will significantly improve riparian habitat, increase shading of the stream channels, and improve water quality onsite and downgradient of the Subarea. If impacts cannot be avoided and/or minimized, mitigation measures described in the Other Potential Mitigation Measures section below will be incorporated.

The use of mitigation banks or in lieu fee (ILF) programs for impacts within the same watershed is preferred by both WSDOE and USACE, as they are associated with larger scale systems and can provide an even greater improvement to the watershed as a whole. The site is located within the service area for the Skykomish Habitat Mitigation Bank (SHMB) and Snohomish Basin Mitigation Bank (SBMB), both of which are approved for use and have credits available for purchase. The site is not located within the service area of any approved ILF programs. Therefore, potential mitigation options for any potential impacts include either permittee responsible onsite in-kind, permittee responsible onsite out-of-kind, permittee responsible offsite in-kind, permittee responsible offsite out-of-kind, or mitigation banks.

As the site is degraded, there is the potential for mitigation to occur onsite. The type of onsite mitigation will be dependent upon the type and extent of impacts proposed, the likelihood of success, and coordination with the local, state, federal, and tribal agencies. It is unlikely that the site has the spatial capabilities to support mitigation for all proposed impacts, and as such, purchase of credits from a mitigation bank for the remaining deficit is reasonable and acceptable.

In its existing state, the subarea is largely degraded by mowing, agricultural land uses including farm animals, and a relatively heavy presence of non-native invasive species. These conditions are prevalent in both uplands as well as critical areas and their associated buffers. If no development is proposed, the existing conditions will be retained as they currently are as enhancement of wetland buffers is only required when associated with a proposed development in their vicinity. As a result, Alternative 1 would ultimately likely result in the bulk of wetlands and streams remaining degraded, functioning below their ecological potential, as only buffer enhancement is required for wetland buffers utilizing reduced buffers; while stream buffers and the wetlands themselves do not require enhancement under AMC 20-93.

Conversely, as any form of development would require enhancement of degraded wetland buffers at a minimum, the final condition for any of the potential impact and mitigation strategies associated with Alternative 2 results in either net zero loss or overall lift in ecological function. Any combination of these strategies could be applied in order to avoid, minimize, rectify, and compensate for potential impacts.

Exhibit 3.2-2 below outlines the various code allowances for proposed development with the associated mitigation requirements. The table outlines the AMC 20-93 code allowances for wetland and stream buffer modifications, temporary and permanent buffer impacts, and buffer mitigation options. Additionally, the table outlines the AMC 20-93 code allowances for temporary and permanent wetland impacts, and the allowed mitigation options to offset impacts to critical areas and associated buffers as outlined within AMC 20-93.

**Exhibit 3.2-2. AMC 20-93 Code Allowances with Associated Mitigation Requirements**

Code Allowance <sup>1</sup>	Mitigation Sequencing <sup>2</sup>	Requirements <sup>3</sup>	Mitigation Options <sup>4</sup>	Proposed Condition <sup>5</sup>
Natural Buffer Retention AMC 20.93.330	Avoid	Retain natural buffer condition	None required.	Buffers remain degraded
Standard Buffer Requirements AMC 20.93.830(a)	Avoid	Increase buffer width	None required	Buffer width increased, but remains degraded
		Implement mitigation measures and improve degraded buffer	Enhancement	Avoid and/or limit impacts to critical areas and their buffers while improving buffer condition
Buffer Impacts (Temporary) AMC 20.93.330	Minimize and rectify	Where disturbed, revegetate	Restoration	Impacted buffers are restored, in areas where the buffers are currently degraded, this will result in improved conditions
Buffer Impacts (Permanent)	Minimize and compensate	Onsite in-kind, presumed 1:1 replacement	Creation	Replace impacted buffer area onsite, degraded areas will be

Code Allowance <sup>1</sup>	Mitigation Sequencing <sup>2</sup>	Requirements <sup>3</sup>	Mitigation Options <sup>4</sup>	Proposed Condition <sup>5</sup>
AMC 20.93.820				improved through enhancement measures.
		Offsite replacement	Mitigation Bank	Impacted buffer will be compensated through the purchase of credits from a mitigation bank within the same watershed
Buffer Averaging AMC 20.93.320	Avoid	Buffer width reduction up to 25%, net zero loss of buffer area	Enhancement (if degraded)	Average buffer to avoid impacts and improve buffer conditions for any part of the existing buffer that is degraded
Mitigation Wetland Impacts AMC 20.93.840	Rectify	Restore areas temporarily impacted by construction activities	Restoration	Ensures temporarily impacted areas are restored with native vegetation, may provide improvement over existing degraded condition
	Compensate	Onsite in-kind replacement according to Table 20.93-7	Creation, restoration, and/or enhancement	Impacted critical area will be replaced onsite at a higher ratio resulting in overall net increase of that critical area onsite
	Compensate	Offsite replacement	Mitigation Bank	Impacted critical areas will be compensated through the purchase of credits from a mitigation bank within the same watershed

1. AMC 20-93 code allowances for buffer modifications, temporary and permanent buffer impacts, indirect wetland impacts, and permanent wetland impacts.
2. Mitigation sequencing as outlined in AMC 20.93.100 "Mitigation".
3. Mitigation requirements per AMC 20-93 to offset impacts to critical areas or associated buffers.
4. Mitigation allowances to offset impacts to critical areas per AMC 20-93, 20.93.740, and 20.93.840.
5. Description of conditions of mitigation implementation.

Based on preliminary site plans for the Subarea, mitigation will be needed to offset two types of impacts:

- Direct and indirect wetland impacts associated with the partial fill of such areas and
- Indirect impacts to wetlands and streams<sup>3</sup> associated with intrusions into the buffers that cannot be accommodated through buffer averaging.

These impacts will likely be offset through a combination of wetland creation, enhancement, and the purchase of mitigation bank credits from the Skykomish Habitat Mitigation Bank (SHMB).

**Wetland creation and enhancement.** Based on preliminary analysis, onsite mitigation is likely limited due to the spatial requirements to provide mitigation at required ratios

specified in AMC 20.93.840 Table 20.93-7 and interagency mitigation guidance documents (WSDOE et al., 2021) and associated perimeter buffers. Onsite wetland creation actions coupled with the enhancement of existing degraded wetland areas will improve wetland functions in the immediate landscape consistent with the mitigation preferences of AMC 20.93.840(a) by establishing native forest and scrub-shrub wetland communities in areas currently degraded by prior land clearing and mowing and the encroachment of non-native invasive species.

**Wetland mitigation bank credits.** The purchase of mitigation bank credits to offset any remaining mitigation deficits is consistent with interagency mitigation preferences and will contribute to environmental improvements on a watershed scale. The credits contribute to a large-scale third party responsible mitigation site within the Snohomish River watershed.

**Avoiding/minimizing wetland and stream buffer impacts.** Permanent impacts to buffer areas associated with the identified wetlands and streams will be avoided/minimized to the greatest extent feasible by utilizing buffer averaging measures allowed per AMC 20.93.320. Where applicable, undisturbed vegetated corridors between wetlands and habitats specified in AMC 20.93.830(1)(A) will be maintained for standard buffer widths specified in AMC Table 20.93-4.

**Buffer enhancement.** AMC 20.93.830(4) requires the enhancement of degraded wetland buffers; as such, any degraded wetland buffers identified within the Subarea would be fully restored with an assortment of native trees, shrubs, and groundcover to improve screening and habitat between the wetlands and development. Where permanent wetland and stream buffer impacts are required beyond the standard allowances of AMC Chapter 20.93, mitigation measures may include a combination of buffer creation designed to meet the ratios specified in AMC 20.93. If space is not available onsite to meet required mitigation ratios, permanent buffer impacts may also be compensated through the purchase of credits from the SHMB.

**Culvert replacement.** Preliminary plans for the Subarea generally avoid new/direct stream impacts. However, the project will require frontage improvements and the expansion of 79<sup>th</sup> Ave NE for site access. Stream Z is currently conveyed beneath 79<sup>th</sup> Ave NE through a piped culvert that impedes flow. Any frontage improvements will include upgrading the stream crossing to improve/restore drainage patterns in the landscape.

**Temporary buffer impacts and restoration.** Construction activities such as site grading and the installation of utilities/stormwater infrastructure will likely result in temporary impacts to buffers. All temporary buffer impacts will be fully restored with native plantings once development activities have concluded.

**Permanent critical areas protection.** Finally, as part of the future development plans for the Subarea, all of the remaining wetlands, streams, and associated buffer areas will be placed in a protected NGPA to maintain habitat corridors and prevent future development. The

NGPA will be marked with critical areas signs and delineated with a split-rail fence to prevent intrusion.

**Edgecomb Creek crossing.** If a road crosses the Edgecomb Creek headwaters in the southwestern area, mitigation measures would be required to maintain drainage patterns and fish passage.

## Proposed Code Amendments

Per AMC 20.44.032.(d) *“As subarea plans are created, elements of form based code are proposed to be included to provide the community with a predictable design and development pattern that is customized for the specific area”*. As such, AMC allows for code customized for the specific subarea to be proposed that will provide the community with a predictable design and development pattern. The City will make the following code amendments to support feasible development with a net benefit to ecological functions and values.

### Wetland buffers flexibility

The City of Arlington will apply the following options to the Lindsay Subarea to:

- Allow a 25-percent wetland buffer reduction beyond the minimum wetland buffer requirements identified in AMC Table 20.93-4, if the wetland is enhanced with native tree and shrub plantings and non-native invasive plants are removed.
- Allow wetland buffer averaging of the 25-percent-reduced wetland buffers (beyond the minimum wetland buffer requirements identified in AMC Table 20.93-4) when associated with wetland enhancement.

**Rationale.** Currently, AMC 20.93 does not have any code mechanisms requiring the enhancement of degraded wetlands that are lacking native tree and shrub cover and that are dominated by non-native invasive species. Thus, the proposed 25-percent buffer reduction allowance that would require wetland enhancement would allow for more flexibility within the Subarea plan design, and would also result in a net ecological lift in the functions and values of the wetlands within the Subarea through wetland enhancement. As many of the wetlands identified within the Lindsay are dominated by herbaceous plants and non-native invasive species, and significantly lack native shrub and tree cover, there would be significant ecological benefit to wetland habitat and water quality functions through allowing for a 25-percent buffer reduction with required wetland enhancement. As currently codified, future development in the Subarea would not be required to enhance wetland areas, and would only be required to enhance wetland buffer areas, which would result in wetland buffers being enhanced but wetland areas not being enhanced.

The buffer averaging of reduced buffers would allow for greater flexibility in site plan design to meet City housing goals while also avoiding direct wetland impacts and permanent buffer impacts. The reduced wetland buffer averaging allowance would align with the criteria identified in AMC 20.93.320- Buffer Averaging.

### Stream buffers flexibility

The City of Arlington will apply the following options to the Lindsay Subarea in the Future Development Area:

- Allow a 25-percent stream buffer reduction beyond the standard buffers for any buffer over 50 feet (as identified in AMC Table 20.93-3), if the stream buffers are enhanced and/or restored through the removal of non-native invasive plants and installation of native trees and shrubs.
- Allow stream buffer averaging of the reduced stream buffers beyond the minimum stream buffer requirements identified in AMC Table 20.93-3.

In the Pending Project Area, the buffer of Edgecomb Creek/Stream Z shall be 50 feet, as generally depicted in Appendix G.

**Rationale.** Currently, AMC 20.93 does not allow for any outright stream buffer reductions and does not require stream buffer enhancement. As many of the stream buffer areas onsite are degraded through the presence of non-native invasive species and lack native tree and shrub cover, a 25-percent reduced stream buffer combined with stream buffer enhancement would provide a net ecological lift to the habitat and water quality functions within riparian areas and streams within the Subarea.

Buffer averaging (of the reduced buffers) allows for greater flexibility in site plan design. It also aligns with the criteria identified in AMC 20.93.320- Buffer Averaging.

## Stormwater Management

**Stormwater facilities for water quality and quantity.** Impacts associated with increases in impervious surfaces and the residential capacity of the Subarea will be offset through stormwater facilities preliminarily designed to include several stormwater detention ponds that will collect runoff. Collected runoff will undergo enhanced water quality treatment prior to being dispersed to wetland/stream buffers to maintain existing site drainage patterns and hydrology. The presence of Edgecomb Creek, a stream with documented salmonids, within the sub-area necessitates additional considerations for stormwater treatment, specifically in regard to 6PPD, as enhanced water quality treatment alone is not sufficient to remove 6PPD from stormwater.

Based on the current best available science provided by the WSDOE and the Washington Stormwater Center, 6PPD and 6PPDq are removed below toxicity levels or detection levels if biofiltration and infiltration Best Management Practices (BMPs) are applied to stormwater treatment. 6PPD appears to change conformation and bind to biological media similar to other active organic compounds. Given the unknown long-term impact to aquatic species and of particular interest to ESA-listed bull trout, chinook salmon, and steelhead, the WSDOE recommends using BMPs to remove 6PPD and 6PPDq from stormwater. The WSDOE has identified 28 BMPs for flow and treatment control and 9 BMPs for source control with a high

treatment potential effectiveness for 6PPD and 6PPDq based on what is currently known about the pollutant. Example BMPs include:

- Dispersing stormwater into vegetated wetland/stream buffers, bioswales, or rain gardens for the vegetation and soil to remove the 6PPD and 6PPDq.
- Including approved engineered soils within a stormwater pond that bond to 6PPD and 6PPDq and remove the toxin before stormwater leaves the pond.

## Regulations and Commitments

The Subarea will have to be designed to adhere to the regulations established in AMC Chapter 20.93 – Critical Area Ordinance (CAO), as applicable and to the greatest extent feasible in order to protect critical areas and associated buffers identified throughout the site. General allowances for activities in critical areas and associated buffers are specified in AMC 20.93.200. Additional allowances for activities in streams and associated buffers are specified in AMC 20.93.720. Additional allowances for activities in wetlands and associated buffers are provided in AMC 20.93.820. The EIS was drafted in November 2025 prior to the City’s planned adoption of an updated CAO. It is acknowledged that future development that is not vested under the CAO in effect as of November 2025 will be required to comply with the future adopted CAO.

In the Pending Project Area, the buffer of Edgecomb Creek/Stream Z shall be 50 feet, as generally depicted in Appendix G. In the Future Development Area, all streams will be classified in accordance with the definitions provided in AMC 20.93.700, which has adopted the state stream classification system specified in WAC 222-16-030. Stream buffers will be established and maintained as established herein and in accordance with the requirements of AMC 20.93.730. Where stream and/or stream buffer impacts are necessary and unavoidable, mitigation will be required in accordance with AMC 20.93.740.

All wetlands will be classified in accordance with the definitions provided in AMC 20.93.800, which has adopted to current Washington State Wetland Rating System for Western Washington (Hruby and Yahnke, 2023). Wetland buffers will be established in accordance with the requirements of AMC 20.93.830. Where wetland and/or wetland buffer impacts are necessary and unavoidable, mitigation will be required and provided in accordance with AMC 20.93.840.

Impacts to critical areas and associated buffers will require coordination and authorization from the City of Arlington. Additionally, direct and indirect wetland and stream impacts will require coordination and authorization with state and federal agencies. Federal authorizations will likely be applied for under Section 404 of the CWA through a Nationwide Permit, and additional authorizations from WSDOE for Section 401 of the CWA will be obtained through a Water Quality Certification and consistency with the Coastal Zone Management Program.

Any in-water work (i.e., culvert replacements) within the identified streams will require coordination and authorization from WDFW by requesting a Hydraulic Project Approval (HPA).

## Other Potential Mitigation Measures

Several mitigation measures are incorporated in the plan; no additional potential mitigation measures are currently under consideration.

### 3.2.4 Significant Unavoidable Adverse Impacts

Alternative 1 would retain wetlands, streams, and required buffers in their existing conditions and comply with AMC 20.93, with limited improvements beyond current code requirements. Alternative 2 would result in direct and indirect critical areas impacts. The proposed impacts are not anticipated to be considered significant and would be compensated through onsite and offsite mitigation. This includes NGPA designations; onsite wetland creation, enhancement, and restoration; stream channel restoration; fish passage improvements; buffer enhancement; and purchase of credits from the Skykomish Habitat Mitigation Bank. Additionally, stormwater facilities would be designed to collect and treat runoff to maintain existing water quality. Collectively, these measures are expected to achieve a net lift in ecological functions onsite and at a watershed scale, ensuring that no significant adverse impacts to wetlands, streams, or associated buffers would occur.

**Therefore, neither alternative is anticipated to result in significant adverse impacts to the natural environment.** However, Alternative 2 does provide a significant amount of mitigation both as compensation for potential impacts as well as voluntary improvements that are anticipated to provide an overall net lift in ecological benefits of the site.

## 3.3 Transportation

This chapter provides an assessment of current transportation conditions and the potential transportation-related impacts of the development alternatives for the Lindsay subarea.

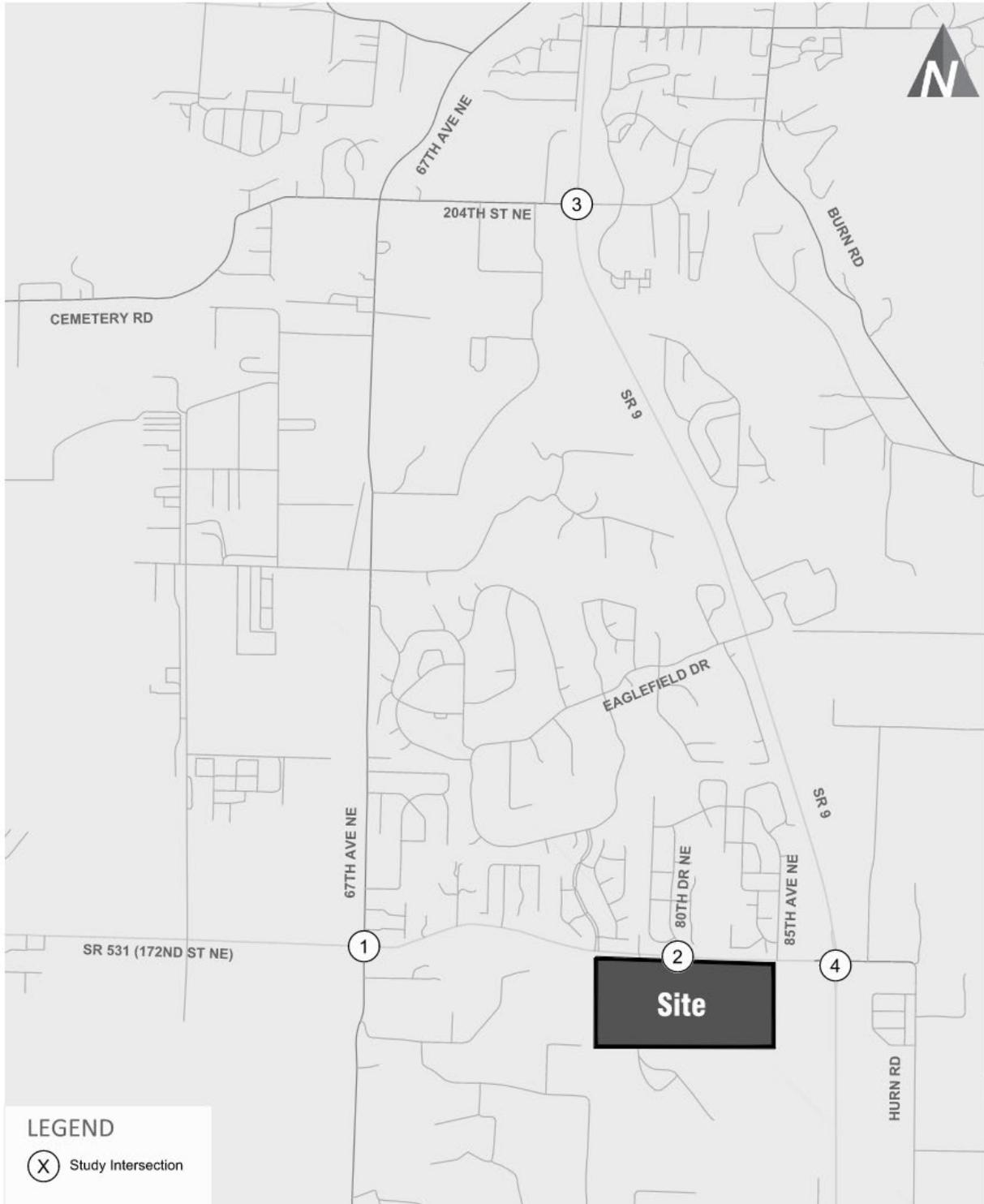
### 3.3.1 Affected Environment

This section describes existing transportation conditions and key facilities near the Lindsay Subarea. Information is provided regarding the non-motorized facilities, transit service and facilities, traffic volumes, and traffic operations in the study area. The study area defined for this analysis includes the SR 531 (172<sup>nd</sup> St NE) corridor from 67<sup>th</sup> Ave to SR 9 and the SR 9/204<sup>th</sup> St NE intersection:

1. 67<sup>th</sup> Ave NE/SR 531 (172<sup>nd</sup> St NE)
2. 80<sup>th</sup> Dr NE/SR 531 (172<sup>nd</sup> St NE)
3. SR 9/204<sup>th</sup> St NE
4. SR 9/SR 531 (172<sup>nd</sup> St NE)

A map of the subarea location and study area intersections is shown on Exhibit 3.3-1.

Exhibit 3.3-1. Subarea Location and Study Intersections Locations



Source: Transpo Group, 2025

## Non-Motorized Facilities

There are currently no sidewalks or bicycle facilities along SR 531 (172<sup>nd</sup> St NE) between 67<sup>th</sup> Ave and SR 9.

The Centennial Trail runs along the eastern side of 67<sup>th</sup> Ave and is approximately 23 miles long connecting the Cities of Snohomish, Lake Stevens, and Arlington. The path is a 10-foot wide paved trail used for walking, bicycling, hiking, and horseback riding.

The SR 531 Trail (67<sup>th</sup> Ave to Highway 9) is a planned 12-foot-wide multi-use trail along the north side of SR 531 from 67<sup>th</sup> Ave to SR 9. The trail will be grade-separated and will include landscaping and street and pedestrian lighting. The trail will provide non-motorized access to the Cascade Industrial Center and the Centennial Trail at 67<sup>th</sup> Ave on the west end, and access to a future trail north of SR-9 that will access Old Town Arlington and other retail centers on the east end.

## Transit

Transit service in the study area is provided by Community Transit with service primarily along SR 531 (172<sup>nd</sup> St NE) and Smokey Point Boulevard. The nearest bus stop to the project is located at Smokey Point Boulevard/ SR 531 (172<sup>nd</sup> St NE) approximately 2.75 miles away and is served by routes 201 and 202. Routes 201 and 202 provide service between the Smokey Point Transit Center in Arlington and the Lynnwood Transit Center. Transit service for routes 201 and 202 is provided 7 days a week with AM and PM peak hour headways of approximately 40 minutes on weekdays and 60 minutes on weekends.

## Roadway Network

The key roadways serving the Lindsay Subarea are described below.

**SR 531 (172<sup>nd</sup> St NE)** is an east-west highway of regional significance that runs along the Lindsay Subarea frontage connecting I-5 to the west and SR 9 to the east. It is primarily a two-lane roadway between 67<sup>th</sup> Ave NE and SR 9 with a posted speed limit of 35 mph. No parking is allowed and no pedestrian or bicycle facilities are currently provided east of 67<sup>th</sup> Ave NE.

The SR 531 (172<sup>nd</sup> St NE) Trail (67<sup>th</sup> Ave to Highway 9) is a planned 12-foot-wide multi-use trail along the north side of SR 531 from 67<sup>th</sup> Ave to SR 9. The trail will be grade-separated and will include landscaping and street and pedestrian lighting. The trail will provide non-motorized access to the Cascade Industrial Center and the Centennial Trail at 67<sup>th</sup> Ave on the west end, and access to a future trail north of SR 9 that will access Old Town Arlington and other retail centers on the east end.

**204<sup>th</sup> St NE** is an east-west roadway arterial located north of the Lindsay Subarea. The roadway has a posted speed limit of 20 mph east of SR 9 and 35 mph west of SR 9, with a predominantly two-lane cross section. Sidewalks are provided on both sides of the roadway. No bike lanes are available.

**67<sup>th</sup> Ave NE** is a north-south minor arterial located west of the Lindsay Subarea. The roadway generally has a posted speed limit of 35 mph and a predominately three-lane cross section. Sidewalks are provided along the east side of the roadway and no parking is allowed. The Centennial Trail runs along the east side of 67<sup>th</sup> Ave NE, providing bicycle and additional pedestrian facilities.

**80<sup>th</sup> Dr NE** is a north-south local roadway located directly north of the Lindsay Subarea. The roadway has a posted speed limit of 25 mph and a two-lane cross-section. Sidewalks are provided on both sides of the roadway; however, no bike lanes are available. Parking is allowed on both sides of the roadway.

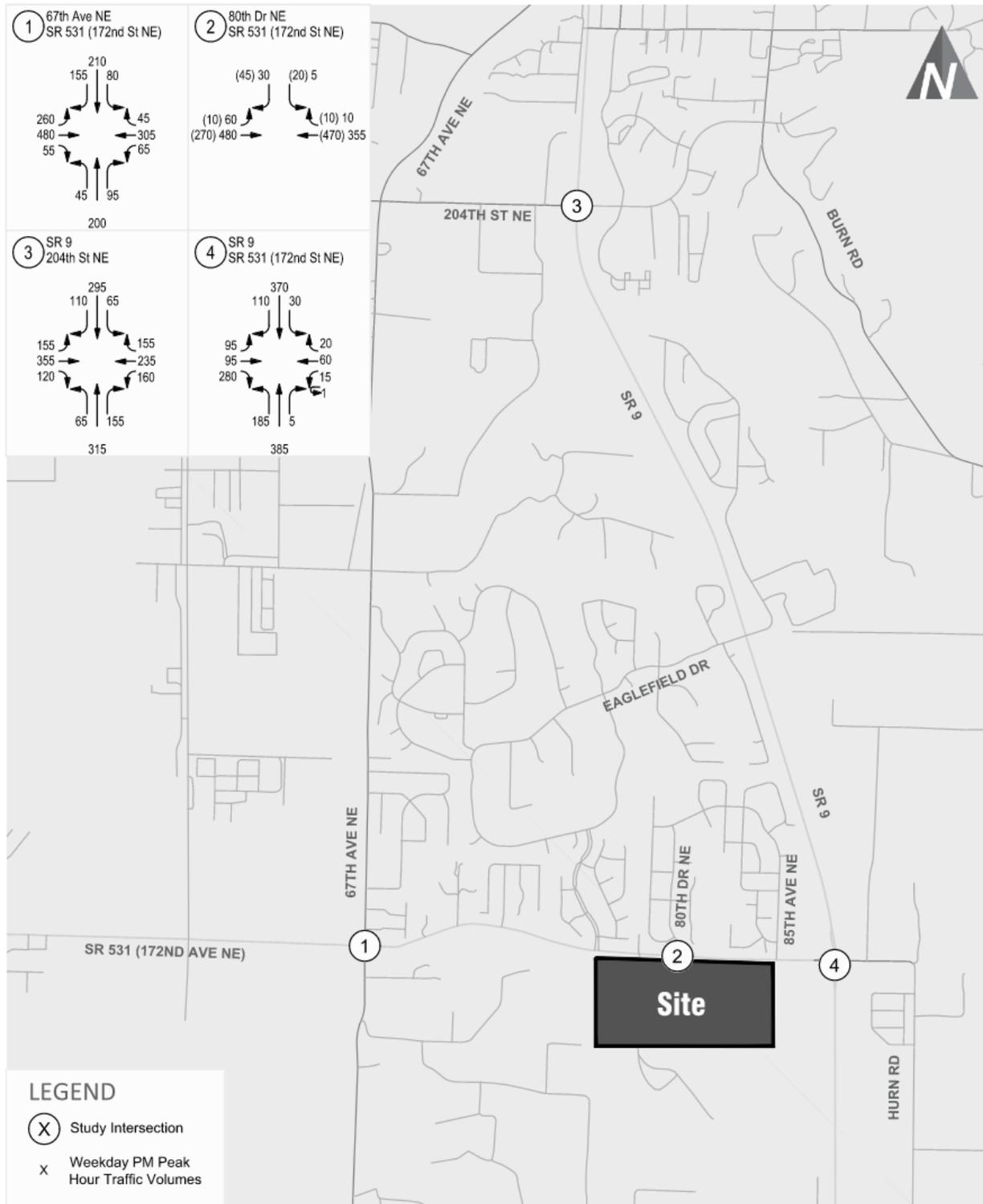
**SR 9** is a north-south highway located east of the Lindsay Subarea connecting Lake McMurray to the north and Snohomish to the south. It is a two-lane facility with a posted speed limit of 45 mph near the Lindsay Subarea. Access to the Lindsay Subarea from SR 9 is provided via an at-grade intersection with SR 531 (172<sup>nd</sup> St NE). There are no sidewalks, bicycle facilities, or parking along SR 9.

## Traffic Volumes

Existing weekday PM peak hour traffic volumes were collected in June 2024 and November 2024. 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. Existing traffic counts are provided in Appendix D.

Weekday PM peak hour traffic volumes along SR 531 (172<sup>nd</sup> St NE) were less than 800 vehicles in either direction. Volumes along SR 9 near SR 531 (172<sup>nd</sup> St NE) were less than 700 vehicles in either direction during the weekday PM peak hour. Volumes along 67<sup>th</sup> Ave NE near SR 531 (172<sup>nd</sup> St NE) were less than 550 vehicles in either direction during the weekday PM peak hour. The local roadway of 80<sup>th</sup> Dr NE had volumes of less than 100 vehicles in either direction. Higher volumes along SR 531 (172<sup>nd</sup> St NE) are consistent with the State Route functional class designation whereas lesser volumes along 67<sup>th</sup> Ave NE and 80<sup>th</sup> Dr NE are representative of the classification as an arterial and local roadway, respectively. Existing (2025) PM peak hour volumes are shown on Exhibit 3.3-2.

Exhibit 3.3-2. Existing (2025) PM Peak Hour Volumes



Source: Transpo Group, 2025

# Traffic Operations

Performance measures were identified for determining traffic operations including intersection delay-based level of service (LOS) at the 3 study intersections.

## Intersection LOS

For signalized locations, LOS is measured in average delay per vehicle and is reported for the intersections 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 of the intersection. Traffic operations for an intersection can be described alphabetically with a range of levels of service (LOS A through F), with LOS A indicating free-flowing traffic and LOS F indicating extreme congestion and long vehicle delays. Appendix E contains a detailed explanation of LOS criteria and definitions.

City of Arlington study intersections traffic operations were evaluated based on the procedures identified in the *Highway Capacity Manual (HCM), 7th Edition* and using the *Synchro 12* software program. Sidra 9 and the WSDOT Sidra Policy and Settings parameters were used to evaluate operations at roundabout controlled intersections. Signal timing splits and offsets were optimized for all future conditions.

Exhibit 3.3-3 summarizes the study intersections existing operations. The adopted standard at all of the study intersections is LOS D. Detailed LOS worksheets are provided in Appendix F.

As shown in Exhibit 3.3-3, all intersections operate at LOS D or better, meeting the current LOS standards.

**Exhibit 3.3-3. Existing Weekday PM Peak Hour Intersection LOS Summary**

Intersection	Jurisdiction	LOS Standard	Traffic Control	LOS <sup>1</sup>	Delay <sup>2</sup>	WM <sup>3</sup>
1. 67th Ave NE/SR 531 (172nd St NE)	WSDOT	D	Signal	D	47	-
2. 80th Dr NE/SR 531 (172nd St NE)	WSDOT	D	Two Way Stop	C	20	SB
3. SR 9/204th St NE	WSDOT	D	Signal	C	33	-
4. SR 9/SR 531 (172nd St NE)	WSDOT	D	Round-about	A	7	-

Source: Transpo Group, 2025.

1. Level of Service (A – F) as defined by the Highway Capacity Manual (TRB, 7th Edition)
2. Average delay per vehicle in seconds
3. Worst movement reported for unsignalized two-way stop-controlled intersections. NB = Northbound, SB = Southbound, WB = Westbound.

## Traffic Safety

Exhibit 3.3-4 summarizes the most recent 5-year collision history at the study intersections and roadway segments based on data obtained from the WSDOT. The data was reviewed to understand if there are any existing traffic safety issues within the study area.

**Exhibit 3.3-4. Five Year Collision Summary – 2019 to 2023**

Location	Traffic Control	2019	2020	2021	2022	2023	Total	Annual Average	Collisions per MEV <sup>1</sup>
<b>Intersections</b>									
1. 67th Ave NE/SR 531 (172nd St NE)	Signal	8	4	8	2	5	27	5.40	<b>0.74</b>
2. 80th Dr NE/SR 531 (172nd St NE)	Two-Way Stop	1	0	0	0	0	1	0.20	<b>0.06</b>
3. SR 9/204th St NE	Signal	6	5	4	6	2	23	4.60	<b>0.58</b>
4. SR 9/SR 531 (172nd St NE)	Round-about	2	2	3	2	0	9	1.80	<b>0.30</b>

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 3.3-4, all study intersections have collisions per MEVs less than one.

## 3.3.2 Potential Impacts

The transportation impacts of the No Action and Action Alternative are described in this section.

The study intersections are within Arlington and WSDOT jurisdictions. The LOS standards (and thresholds of significance) 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. In addition, the LOS D standard applies to local roads that primarily serve its central business district or industrial areas. The City of Arlington further recognizes and adopts the most current LOS standard along state highways.
- **WSDOT.** LOS D for highways of statewide significance (HSS) facilities in urban areas.

### Impacts Common to All

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 531 (172<sup>nd</sup> St NE) Widening, Phase 1**

Widening of SR 531 (172<sup>nd</sup> St NE) from 43<sup>rd</sup> Ave NE to 59<sup>th</sup> Avenue NE to a four-lane facility with two travel lanes in each direction is listed in the WSDOT Statewide Transportation Improvement Program (STIP). The improvement project would install roundabouts at the 51<sup>st</sup> Ave NE and 59<sup>th</sup> Ave NE intersections along SR 531 (172<sup>nd</sup> St NE). The project is completely funded by WSDOT with construction beginning in 2025 and completed in 2026.

- **SR 531 (172<sup>nd</sup> St NE) Widening, Phase 2**

Widening of SR 531 (172<sup>nd</sup> St NE) between 59<sup>th</sup> Ave NE and SR 9 to a four-lane facility with two travel lanes in each direction is listed in the WSDOT STIP. In addition, there will be a roundabout constructed at 67<sup>th</sup> Ave NE and SR 531 (172<sup>nd</sup> St NE). The timing of this widening project is anticipated to be completed before 2044, such that this improvement was assumed in the future analysis.

In addition, non-motorized improvements would be made along the SR 531(172<sup>nd</sup> St NE) corridor including a multi-use trail along the north side of the roadway in the study area.

## Non-Motorized Facilities

The future non-motorized system within the study area is consistent across alternatives. The planned improvement section above describes non-motorized improvements that would occur as new roadways are constructed. The study area will be well connected with sidewalks and bicycle facilities. In addition, future roadway improvements would provide additional connectivity. The network of sidewalks, bike facilities and multimodal trails access to and from as well as within the study area encourages trip making via walking and biking for commuter or other purposes.

## Traffic Safety

Traffic generated by the alternatives results in a proportionate increase in the probability of collisions. It is unlikely that the project traffic would significantly change safety issues in the study area.

## Traffic Forecasts

Future (2044) weekday PM peak hour traffic forecasts were developed consistently for Alternatives using the City of Arlington travel demand model. The land use (outside of the Lindsay Subarea) and transportation system assumptions are the same for all Alternatives. The Lindsay 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 Lindsay Subarea trip distribution and assignment to the study area. Future 2044 forecasts are developed by adding intersection volume growth identified between the models existing and future years. Adjustments are made to the 2044 background traffic volumes for balancing. This methodology is an industry standard practice for post-processing raw travel demand model results into forecast traffic volumes. Forecast traffic volumes for all Alternatives are provided in Appendix F.

## Alternative 1: No Action

### Volume Forecasts

Alternative 1 No Action volume forecasts for the Lindsay Subarea are based on the land use and jobs projections consistent with the Arlington Comprehensive Plan for traffic analysis zones (TAZs) 423, 424, and 441. (See Exhibit 3.1-5. Lindsay Subarea Full TAZs Map.) Volumes for Alternative 1 were developed using the Arlington travel demand model trip generation, trip distribution and assignment. Exhibit 3.3-5 provides a summary of the traffic volume forecasts for Alternative 1 No Action Alternative's weekday PM peak hour trip generation (for the Lindsay Subarea full TAZs) estimated using Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition) rates.

**Exhibit 3.3-5. 2044 Lindsay Subarea Full TAZs Weekday PM Peak Hour Trip Generation**

Alternative 1 No Action	In	Out	Total
Retail (LUC 822)	74	74	148
Restaurant (LUC 932)	44	19	63
Single Family Homes (LUC 210) <sup>1</sup>	64	37	101
Office (LUC 710)	13	65	78
<b>Total</b>	<b>195</b>	<b>195</b>	<b>390</b>

Source: Arlington Comprehensive Plan

<sup>1</sup> The current RULC zoning for Lindsay only allows for the development of low-density single-family homes.

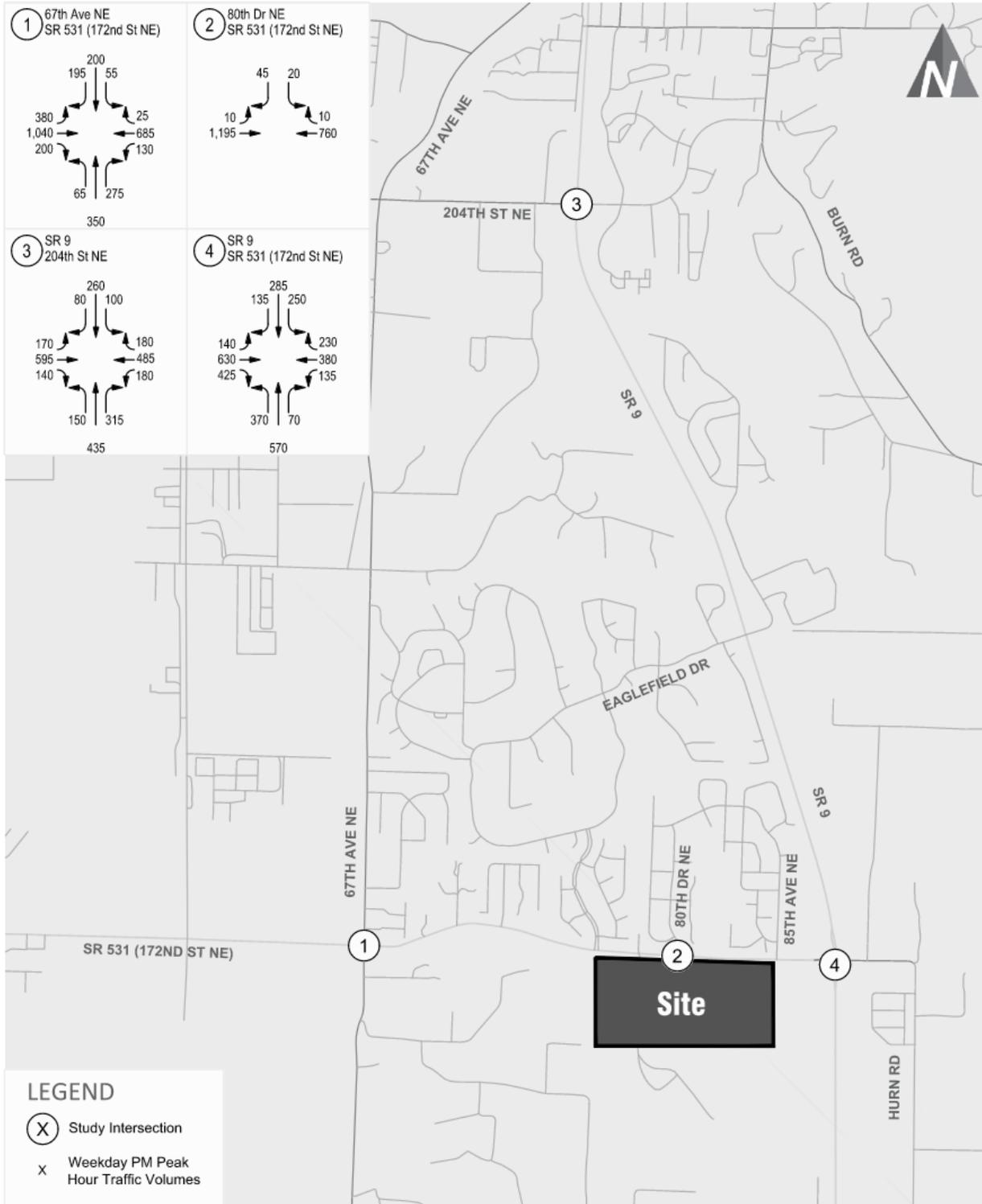
As shown in Exhibit 3.3-5, a total of 390 weekday PM peak hour trips are anticipated to be generated under Alternative 1.

The general distribution of the Lindsay Subarea traffic is anticipated to be:

- 13 percent to/from the north via SR 9
- 16 percent to/from 204<sup>th</sup> Str NE via SR 9
- 9 percent to/from Eaglefield Dr east of and via SR 9
- 5 percent to/from the east via SR 531 (172<sup>nd</sup> St NE)
- 35 percent to/from the south via SR 9
- 6 percent to/from neighborhoods north of and via SR 531 (172<sup>nd</sup> St NE)
- 5 percent to/from 67<sup>th</sup> Ave NE via SR 531 (172<sup>nd</sup> St NE)
- 11 percent to/from the west via SR 531 (172<sup>nd</sup> St NE)

The total Alternative 1 volumes (2044 forecasts plus Alternative 1 trips) are shown on Exhibit 3.3-6.

Exhibit 3.3-6. 2044 Alternative 1 PM Peak Hour Volumes



Source: Transpo Group, 2025

## Traffic Operations

As discussed previously, traffic operations were evaluated based on intersection delay within the local study area defined for this project. Signal timing splits and offsets were optimized for future 2044 operations.

Exhibit 3.3-7 provides a summary of the intersection operations. Detailed LOS worksheets are provided in Appendix F.

### Exhibit 3.3-7. 2044 Alternative 1 Weekday PM Peak Hour Intersection LOS Summary

Intersection	Jurisdiction	LOS Standard	Traffic Control	LOS <sup>1</sup>	Delay <sup>2</sup>	WM <sup>3</sup> or V/C <sup>4</sup>
1. 67th Ave NE/SR 531 (172nd St NE)	WSDOT	D	Round-about	B	11.5	0.70
2. 80th Dr NE/SR 531 (172nd St NE)	WSDOT	D	TWSC <sup>5</sup>	E	45.3	SBL
3. SR 9/204th Str NE	WSDOT	D	Signal	F	107.4	-
4. SR 9/SR 531 (172nd Str NE)	WSDOT	D	Round-about	B	11.0	0.68

Source: Transpo Group, 2025.

1. Level of Service (A – F) as defined by the Highway Capacity Manual (TRB, 7th Edition)
2. Average delay per vehicle in seconds
3. Worst movement reported for unsignalized two-way stop-controlled intersections. NB = Northbound, SB = Southbound, WB = Westbound.
4. Volume to capacity (V/C) ratio for roundabout controlled intersections.
5. TWSC – Two way stop controlled intersection

As shown in Exhibit 3.3-7, all study intersections operate at LOS D or better with planned improvements except for the SR 9/204<sup>th</sup> St NE intersection and 80<sup>th</sup> Dr NE/SR 531 intersection.

## Alternative 2: Proposal, Preferred Alternative

### Volume Forecasts

The traffic analysis for Alternative 2 Proposal reflects a reduction in city-wide growth as compared to forecasts and environmental review conducted for the City comprehensive plan. In addition, the land use density targeted for the Lindsay subarea has been reallocated from TAZs 423, 424, and 441 and concentrated within this area. Exhibit 3.3-8. 2044 Alternative 2– Lindsay Subarea Plan Weekday PM Peak Hour Trip Generation provides a summary of the weekday PM peak hour trip generation, which was estimated using Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition) rates.

**Exhibit 3.3-8. 2044 Alternative 2– Lindsay Subarea Plan Weekday PM Peak Hour Trip Generation**

Land Use	In	Out	Total
Apartments (LUC 220)	15	9	24
Single-Family Detached Housing (LUC 210)	186	110	296
Single-Family Attached Housing (LUC 215)	30	21	51
<b>Total Trips*</b>	<b>231</b>	<b>140</b>	<b>371</b>

\*See analysis regarding addition of up to 10,000 square feet of commercial below.

Note: LUC = ITE Land Use Code.

Source: Transpo Group, 2020.

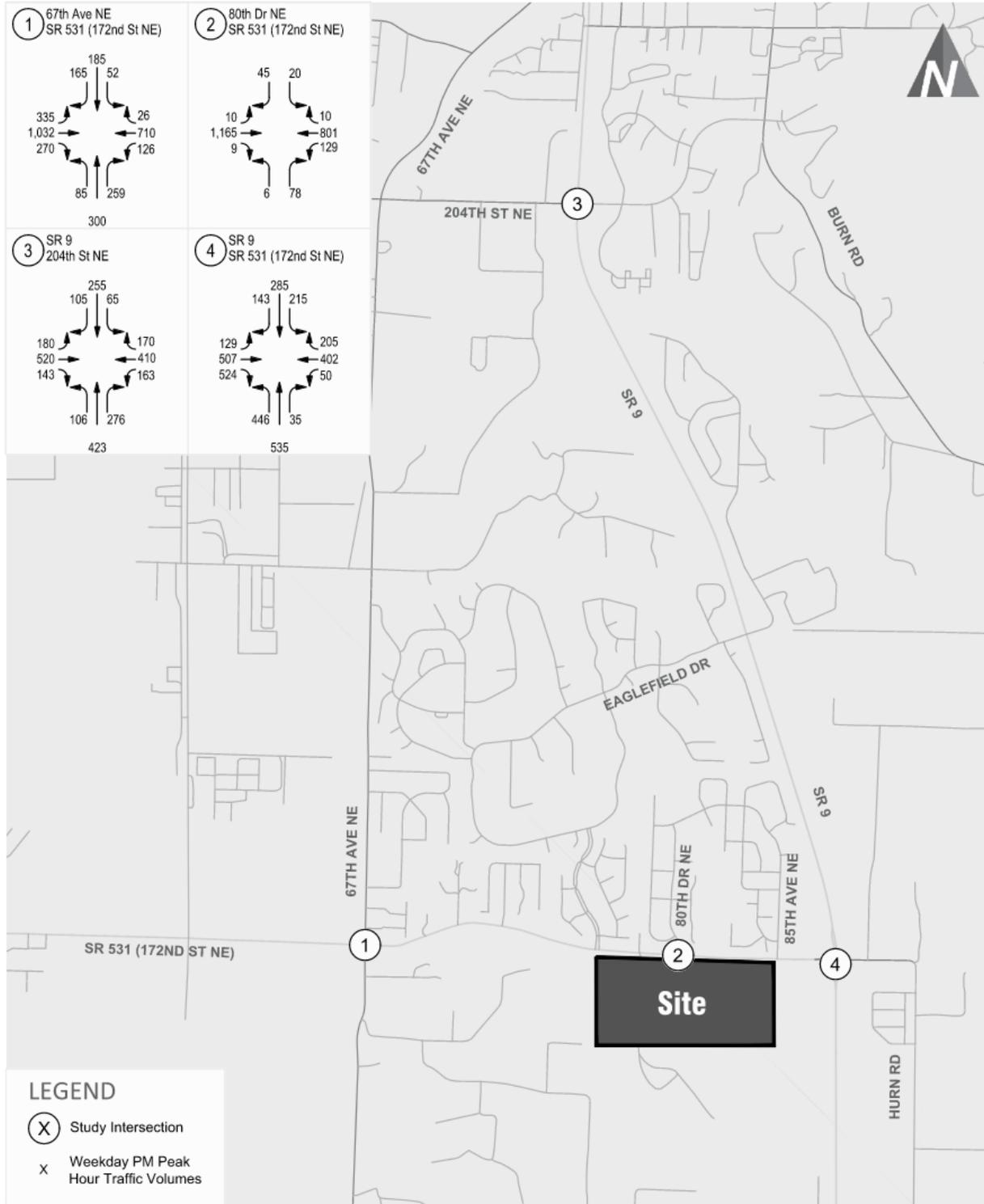
As shown in Exhibit 3.3-8, Alternative 2 is anticipated to generate approximately 371 weekday PM peak hour vehicle trips. The general travel patterns for Alternative 2 are anticipated to be similar to Alternative 1. The total Alternative 2 volumes (2044 forecasts plus Alternative 2 trips) are shown on Exhibit 3.3-9.

While not included in the draft site plan, up to 10,000 square feet of retail could develop under Alternative 2. The EIS has analyzed 371 trips regardless of whether they are residential or commercial in origin. A future project that includes commercial could provide a traffic study to show no additional impacts are caused by the project, or that the trips generated do not cause the trip generation in the Planned Action Area (i.e., the Lindsay Subarea) to exceed 371 trips.

Based on the ITE Trip Generation Manual rates for retail below 40,000 square feet (land use code 822), 10,000 square feet of retail would generate approximately 652 daily trips, including 78 trips during the PM peak hour. A portion of retail trips generated are pass-by trips, which reflect traffic already on streets in the vicinity of the PAO that would visit the commercial components of the project while on the way to its final destination. Based on the ITE Trip Generation Manual, the pass-by rates for the retail use would be 40 percent. After accounting for pass-by trips, 10,000 square feet of retail would generate approximately 392 new daily trips, including 46 new trips during the PM peak hour.

Should the commercial component, which would generate 46 new PM peak hour trips, be added to the 371 trips analyzed, for a total of 417 PM peak hour trips, the trips generated by the Lindsay Subarea would increase by 12% and the traffic in the site vicinity would increase by 2%. As such, if commercial trips are added to the EIS trips analyzed, a 2% increase in traffic is not expected to cause significant adverse impacts.

**Exhibit 3.3-9. 2044 Alternative 2 PM Peak Hour Volumes**



Source: Transpo Group, 2025

## Planned Improvements

As part of the development of the Lindsay Subarea, access will be provided on a new south leg of the 80<sup>th</sup> Dr NE/SR 531 (172<sup>nd</sup> St NE) intersection. To accommodate other planned improvements along SR 531 (172<sup>nd</sup> St NE) and provide operations that meet LOS standards, a 2-lane roundabout will be installed and was assumed in the future analysis.

Two additional accesses would be provided along SR 531 (172<sup>nd</sup> St NE). ~~A full access would be provided west of 80<sup>th</sup> Dr NE, and a~~ A right-in/right-out only access would be provided east of 80<sup>th</sup> Dr NE. A full access intersection would be provided at 79<sup>th</sup> Ave NE (west of 80<sup>th</sup> Dr NE) until construction of the SR 531 (172<sup>nd</sup> St NE) Widening, Phase 2 project, during which it would be converted to a right-in/right-out access.

## Traffic Operations

As discussed previously, traffic operations were evaluated based on intersection delay for intersections in the study area. Signal timing splits and offsets were optimized for future 2044 operations.

Exhibit 3.3-10 provides a summary of the intersection operations. Detailed LOS worksheets are provided in Appendix F.

**Exhibit 3.3-10. 2044 Alternative 2 – Proposal (Lindsay Subarea Plan) Weekday PM Peak Hour Intersection LOS Summary and Comparison**

Intersection	Jurisdiction	LOS Standard	Traffic Control	LOS <sup>1</sup>	Delay <sup>2</sup>	WM <sup>3</sup> or V/C <sup>4</sup>
2044 Alternative 2: Proposal						
1. 67th Ave NE/SR 531 (172nd St NE)	WSDOT	D	Round-about	B	10.7	0.73
2. 80th Dr NE/SR 531 (172nd St NE)	WSDOT	D	Round-about	A	6.9	0.84
3. SR 9/204th St NE	WSDOT	D	Signal	F	90.0	-
4. SR 9/SR 531 (172nd St NE)	WSDOT	D	Round-about	B	10.8	0.69
2044 Alternative 1: No Action						
1. 67th Ave NE/SR 531 (172nd St NE)	WSDOT	D	Round-about	B	11.5	0.70
2. 80th Dr NE/SR 531 (172nd St NE)	WSDOT	D	TWSC <sup>5</sup>	E	45.3	SBL
3. SR 9/204th St NE	WSDOT	D	Signal	F	107.4	-
4. SR 9/SR 531 (172nd St NE)	WSDOT	D	Round-about	B	11.0	0.68

Source: Transpo Group, 2025

1. Level of Service (A – F) as defined by the Highway Capacity Manual (TRB, 7th Edition)
2. Average delay per vehicle in seconds
3. Worst movement reported for unsignalized two-way stop-controlled intersections. NB = Northbound, SB = Southbound, WB = Westbound.
4. Volume to capacity (V/C) ratio for roundabout controlled intersections.
5. TWSC – Two way stop controlled intersection

As shown in Exhibit 3.3-10, all study intersections operate at LOS D or better with planned improvements except for the SR 9/204th St NE intersection. Intersection delays under the Alternative 2 are forecast to be lower than Alternative 2 1.

In addition to the offsite study intersections, two additional proposed site accesses on SR 531 (172<sup>nd</sup> St NE) were evaluated. The western access, which is proposed to provide full access, is forecast to operate at LOS D with a northbound delay of 34.9 seconds. The eastern access, which is proposed to provide right-in/right-out access only, is forecast to operate at LOS D with a northbound delay of 25.7 seconds.

Alternative 2 traffic volumes and traffic operations impacts would be less than or similar to those described for Alternative 1, which is consistent with the Arlington Comprehensive Plan. Given the similar transportation impacts of all the Alternatives, section 3.3.3 Mitigation Strategies shows similar measures are recommended for all Alternatives.

### 3.3.3 Mitigation Strategies

This Section presents mitigation measures that would offset or reduce potential transportation impacts of the Alternatives. The impacts of the alternatives are similar, which results in similar mitigation measures. Mitigation measures include physical improvements to intersections and roadways to facilitate vehicular traffic.

## Intersection and Roadway Improvements

As part of the development of the Lindsay Subarea, access will be provided on a new south leg of the 80<sup>th</sup> Dr NE/SR 531 (172<sup>nd</sup> St NE) intersection. To accommodate other planned improvements along SR 531 (172<sup>nd</sup> St NE) and provide operations that meet LOS standards, a 2-lane roundabout will be installed.

No new off-site impacts have been identified due to the shifting of density into the subarea. Development in the subarea will contribute to funding City-wide improvement projects defined through the comprehensive plan. Improvements will be funded through the payment of transportation impact fees.

## **Incorporated Plan Features**

All alternatives would include frontage improvements following City and State design standards including sidewalk, curb and gutter.

## **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 program. Impact fees will be determined at a project level when permit applications are filed.

## **3.3.4 Significant Unavoidable Adverse Impacts**

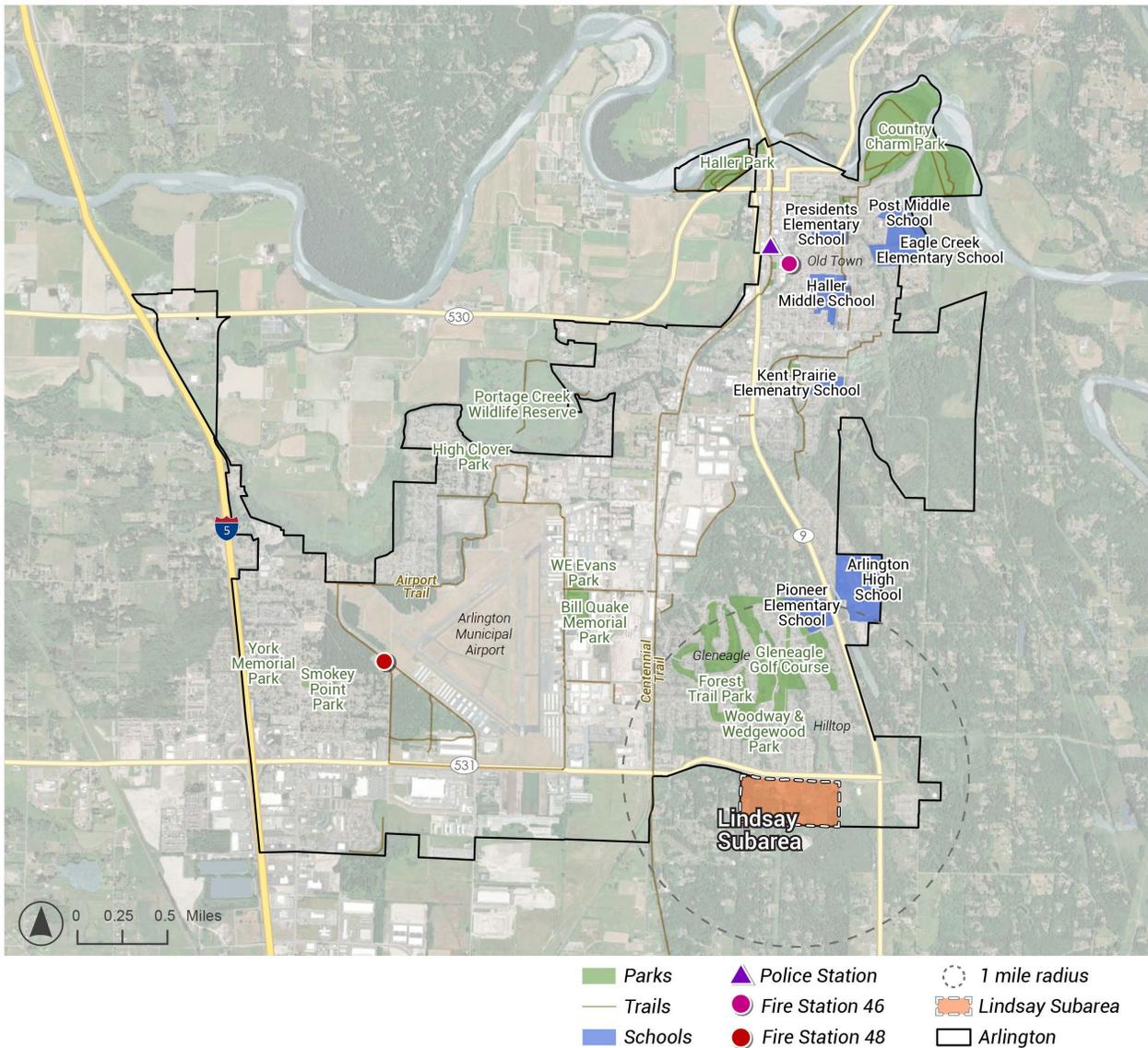
With implementation of the planned improvements in the study area and proposed mitigation measures, there would be no significant and unavoidable impacts related solely to the proposed alternatives.

# 3.4 Public Services

## 3.4.1 Affected Environment

This section describes current conditions for parks, schools, police, and fire/emergency services. See Exhibit 3.4-1 for the location of parks, schools, police and fire facilities in the city and near Lindsay.

**Exhibit 3.4-1. Public Services in Arlington**



Source: City of Arlington, MAKERS, 2025

## Parks

There are currently no existing parks in Lindsay. North of the Subarea are neighborhood subdivisions, Gleneagle and Northern Hilltop, with public and HOA parks, a golf course, and open space lands, interwoven within the neighborhood. See below for the inventory of parks within one mile from the Subarea and Exhibit 3.4-1 for park locations.

**Exhibit 3.4-2. Parks and Trails within 1 mile of Lindsay**

Parks	Location	Acreage	Ownership	Description
Pioneer Elementary and Open Space	8213 Eaglefield Dr	15 acre <sup>1</sup>	Arlington School District	School playground, multipurpose hall, and athletic field, adjacent to wooded riparian habitat with natural trails and exhibits
Forest Trail Park	18005 Oxford Dr	2 acre	Arlington	Park with picnic tables, play area, and sport court
Wedgewood & Woodway Park	17510 Gleneagle Blvd	2.5 acre	Arlington	Wooded park land with picnic tables and play area
Whitehawk Tot Lot	Whitehawk Dr	0.09 acre	HOA	Minipark with playground
Crossing at Edgecomb Creek 1	172 <sup>nd</sup> Ave NE	2.48 acre	HOA	Wooded minipark with two tennis courts
Crossing at Edgecomb Creek 2	73 <sup>rd</sup> Dr NE	0.29 acre	HOA	Minipark with playground and basketball court
Playworld Park	174 <sup>th</sup> PI NE	0.30 acre <sup>1</sup>	HOA	Minipark with playground and basketball court
Eagle Heights Park	179 <sup>th</sup> PI NE	0.35 acre <sup>1</sup>	HOA	Minipark with playground, basketball court, and picnic shelter
Gleneagle Golf Course	7619 E County Club	138.2 acre	Private	Opened in 1993 with driving range, a shop, and a restaurant

Source: Parks and Recreation Master Plan, 2044

<sup>1</sup> Site area estimate excluding, if present, the building and parking footprint.

## Parks and Recreation Master Plan

Completed in 2024, the [Park and Recreation Master Plan \(PRMP\)](#) provides direction for the planning, acquisition, development, and renovation of parks, open space, recreation facilities and programs. The PRMP finds that existing parkland—172.9 acres owned by the city and 1,349.8 acres total, including land owned by HOAs, school district, state, and other entities—is sufficient to support growth if all sites are developed to capacity. The City is also continuing to protect critical areas and is exploring the purchase of development rights to preserve habitat and trail corridors.

The City’s goal is for a park system that provides a park, trail, playground, community center, or other recreation facility within a 5-minute walk of any residential area measured by actual walking routes on trails, paths, sidewalks, or other routes ([Arlington PRMP](#), pp 23-24).

The PRMP identifies that “under the existing level-of-service (ELOS) for Arlington-owned park land and facilities in the city, the forecasted population increase will create a city-wide need for an additional 104.5 acres of land and 8,917 facility units (square feet, courts, fields, etc.) by the year 2050.” However, recognizing a more nuanced approach, “under the proposed level-of-service (PLOS) for all park land and facilities in the city, the forecasted population increase will create a city-wide proposal for an additional 1.0 acres of land and 29,165 facility units (square feet, courts, fields, etc.) by the year 2050” (Arlington PRMP, p. E-15).

In 2022, as part of the PRMP update, the Parks and Recreation Department completed an outreach survey to receive feedback and understand community priorities for potential park facilities improvements. 431 residents responded and key findings include:

- Multiuse trails and playgrounds were top outdoor priorities; activity centers and pools are preferred indoor facilities.
- Teen and youth programs ranked highest with strong interest in after-school and educational programs, supported by facilities such as youth centers, gyms, and children’s museums.
- Environmental programs (e.g., park and trail maintenance) and outdoor recreation (e.g., hiking, camping) received moderate interest.
- Community events like farmers’ markets, craft bazaars, and festivals received moderate to high support.
- Additional priorities included conserving and enhancing creek corridors, improving picnic shelters, and upgrading sports courts.

Based on this feedback and an assessment of existing facilities, the PRMP recommends conceptual projects focused on expanding trail and park capacity. For more information about the proposed SR 531(172<sup>nd</sup> St NE) and SR 9 Trail, refer to 3.3.1 Transportation Affected Environment.

**Exhibit 3.4-3. PRMP Planned Improvements**

Proposed <sup>1</sup>	Description
SR 531/172 <sup>nd</sup> St NE Trail	Extend Airport Trail east on 172 <sup>nd</sup> St NE to SR-9; 1.7 miles
SR-9 Trail	Develop trail on SR-9 from Centennial Trail south to SR 531/172 <sup>nd</sup> St NE
Skate Dots at Forest Trail Park	Install skate dot in park activity area
Sport court at Wedgewood Park	Install sports court in park activity area

Source: Parks and Recreation Master Plan, 2044

<sup>1</sup>Note: The park proposals are conceptual and subject to further study and coordination with public and private partnerships to refine and develop.

**Parks existing regulations**

The following requirements ensure that development meets the City’s goal for every residential area to have a park, trail, playground, community center, or other recreation facility within a 5-minute walk ([Arlington PRMP](#), pp 23-24). They also ensure Arlington continues to meet its existing or proposed level-of-service in terms of park land ([Arlington PRMP](#), p. E-15).

**AMC 20.52.010 - Residential mini-parks required**

AMC 20.52.010 requires any residential development that creates 25 or more units to provide mini-parks or pay a fee in-lieu in addition to providing usable open space as required by AMC 20.52.030. Mini-park land must have an area of at least 65 square feet per person, as determined by average persons per unit type (e.g., studio, 2-bedroom, 3-bedroom), and each mini-park must be between 2,000 and 30,000 square feet.

**AMC 20.52.030 - Residential usable open space**

Every residential development must dedicate at least 10% of the total area (minus critical areas) as usable open space.

**AMC 20.44.032 Subarea Plans - Park Requirement**

As outlined in Section 2.3.2, the fourth element of the AMC 20.44.032 Subarea Plans supersedes the above two requirements, and similarly requires 10% of the total land area (excluding the Native Growth Protection Area (NGPA)) to be dedicated to recreational facilities, open spaces, and a trail system. This must include areas proposed to be dedicated to the city as public spaces. All dedicated parks within the Subarea Area must amount to a minimum of two acres in size and coordinated with the city prior to approval. The proposed trail system must be paved and connect the sidewalk network to all recreation facilities and open spaces.

# Schools

## Arlington School District Capital Facilities Plan

The public schools that serve the City of Arlington and portions of unincorporated Snohomish County are part of Arlington Public Schools (the “District”). The District serves a student population of 5,466 with four elementary schools (K-5), two middle schools (grades 6-8), and one high school (grades 9-12). The District prepared the [Six Year Capital Facilities Plan \(2024 - 2029\)](#) to plan for future needs.

The educational service standards outlined below reflect the standards set by the District. The outlined standards apply only to regular classrooms and do not include special education rooms, labs, gyms, or other special-use spaces. For the school years of 2022-2023, the District’s compliance with the minimum educational service standards was as follows.

**Exhibit 3.4-4. Average Class Size based on Educational Service Standards 2022-2023**

Grade level	Minimum Average Class Size	Reported Average Class Size
Elementary school	26	20.7
Middle school	26	19.3
High school	32	28.6

Source: Arlington School District Capital Facilities Plan, 2024

The Arlington School District operates 11 public schools within the City of Arlington. The Stillaguamish Valley School and Weston High School are housed in separate District-owned facilities and not included in the District’s capital facilities plan. The table below provides an inventory of schools owned and operated by the Arlington School District within the City of Arlington. Pioneer Elementary School and Arlington High School are located within a mile of Lindsay.

**Exhibit 3.4-5. Public School Serving the City of Arlington**

School	Building Area (sq ft)	Teaching Stations	Permanent Capacity
Eagle Creek Elementary School	57,362	28	630
Kent Prairie Elementary School	57,362	28	630
Presidents Elementary School	60,977	31	680
Pioneer Elementary School*	61,530	25	562
Post Middle School	76,323	36 <sup>1</sup>	907 <sup>2</sup>
Hailer Middle School	86,002	31 <sup>1</sup>	612

School	Building Area (sq ft)	Teaching Stations	Permanent Capacity
Arlington High School*	273,871	63	2,036 <sup>3</sup>

Source: Arlington School District Capital Facilities Plan, 2024

\*Schools within 1-mile of Lindsay.

<sup>1</sup>Includes a total of six special education classroom between Post and Hailer Middle School

<sup>2</sup>Includes 150 added seats for the replacement and expansion of Post Middle School, which is expected to be complete in 2028.

<sup>3</sup>Includes Arlington High School Addition – 256 seats, completed summer 2022.

The District has identified several projects to address student growth over the next six years, including the replacement of Post Middle School with 150 additional permanent seats and additions of portable classrooms as needed. In 2022, the Arlington High School expansion, which added 256 permanent seats, was completed to support projected enrollment growth. The recent and planned increase in permanent capacity at the middle and high school levels has created a projected surplus through 2029. However, even with the Post Middle School replacement, the District anticipates shortfalls beginning around 2028-2029. The District has begun exploring options to expand elementary school capacity.

## Public Safety

According to the *Book 7 Public Safety* of the Comprehensive Plan, the City’s level of service for police, fire, and emergency medical services has generally kept pace with recent growth and development. With continued planning, adequate funding, and strong interagency coordination—supported by the [Arlington Police Department’s 2024 Strategic Plan](#) and [North County Fire & EMS 2019-2044 Strategic Plan](#)—Arlington will maintain current service levels and effectively support future growth.

### Police

The Arlington Police Department (APD) is located in the Old Town neighborhood and shares facilities with City Hall and the City Council Chambers. The city’s assets include a police station, police vehicles, training facilities, and equipment. The Arlington’s Police Department currently employs 37 sworn officers.

APD has adopted a care-first approach to enhance public safety services by focusing on prevention, outreach, and support. A key component of this approach is the Embedded Social Worker Program, which pairs a full-time Arlington police officer with a social worker to address issues such as homelessness, substance use, and mental health. In 2020, the City also launched a two-year, \$750,000 pilot program in partnership with the Center for Justice Social Work. This initiative aims to reduce non-emergency 911 calls by delivering integrated social services in the field, such as referrals and home visits.

## Fire/Emergency Services

On February 9, 2021, voters overwhelmingly approved the annexation of the Arlington Fire Department into the North County Regional Fire Authority (NCFA), also known as “North County Fire & EMS”, which provide service to 25,000 people over 110 square miles, including community members of Arlington, Stanwood, and Snohomish County unincorporated areas. As of August 2021, NCFA provides fire and emergency services to the City of Arlington, including:

- Emergency fire suppression, including wildland firefighting
- Emergency medical services and transport
- Fire prevention, inspections, and plan reviews
- Public education and outreach

Arlington is served by two fire stations: Station 46 in downtown Arlington, equipped with a medic unit, engine, and brush truck; and Station 48 at the Arlington Airport, which houses a medic unit, ladder truck, and aid unit. (See Exhibit 3.4-1)

For emergency and medical services, the City of Arlington relies on Skagit Regional Health and Cascade Valley Hospital.

### Wildfire Risk and Response

A wildfire is any uncontrolled fire that involves vegetative fuels that occurs in wildland or wildland-urban interface areas (WUI), where wildland vegetation meets urban and suburban development. Lindsay is located within a WUI Intermix area, characterized by lower-density housing interspersed with undeveloped wildland vegetation. The Snohomish County Wildfire Hazard Map indicates that much of the City of Arlington falls within the lowest wildfire risk zone.

To mitigate wildfire risk, the City’s regulations require clear property addressing to improve emergency response times, require multiple ingress and egress routes, and encourage the use of non-combustible materials in new development.

## 3.4.2 Potential Impacts

Thresholds of significance include:

- **Parks:** Meet PRMP goal for any residential area to be within a 5-minute walk (1/4 mile) of a park, trail, playground, community center, or other recreation facility as measured by actual walking routes on trails, paths, sidewalks, or other routes.
- **Schools, Police, Fire/EMS:** Increase in demand for service/facilities that cause a decline in levels of service beyond planned capacity.

### Impacts Common to All

#### Parks

Each alternative would generate new housing units, and depending on the type and intensity of development, increase the demand for additional parks and green spaces. Under both alternatives, usable open space would be required with residential development.

#### Schools

The number of housing units added under each alternative are expected to drive population growth and a rise in school-aged children. The District determined the student-to-population ratio is 15.75%. This rate is then applied to the net population increase under each alternative to estimate the number of new students generated.

**Exhibit 3.4-6. New Students by Alternative**

Students	Alternative 1: No Action	Alternative 2: Proposal
<b>Lindsay</b>	<b>40</b>	<b>198</b>

Source: MAKERS, 2025.

The projected increase in students could place pressure on existing school facilities and resources at the elementary level where deficits are expected by 2028. According to the [Arlington Public Schools 2024 Facilities Plan](#), the elementary level capacity is -129 students by 2029, which may not accommodate growth in Lindsay if Arlington as a whole grows as projected. If planned construction does not address needs and interim strategies such as portable classrooms are not available, the District could make scheduling, instructional model, grade configuration, class size, and school calendar changes to accommodate growth.

## Police

Arlington’s Police Department employed 37 officers in 2024, which represents 1.8 officers per 1,000 population. Applying the current level of service ratio to the net increase in population under the alternatives, additional officers may be needed to serve the new growth if maintaining the same ratio.

**Exhibit 3.4-7. New Officers Required to Maintain Current Ratio**

Officers	Alternative 1: No Action	Alternative 2: Proposal
<b>Lindsay</b>	<b>0.5</b>	<b>2.3</b>

Source: MAKERS, 2024.

Under both alternatives, the City would implement its [Arlington Police Department’s 2024 Strategic Plan](#), which outlines several goals, including increasing patrol officer capacity to enhance coverage and improve response times and additional support staff to meet the operational demands.

## Fire/Emergency Services

According to the [North County Fire & EMS 2019-2044 Strategic Plan](#), the agency “provide[s] service to 25,000 people over 110 square miles with more than 70 emergency personnel.” This produces an existing level of service of 2.8 firefighters per 1,000 population. Applying that rate to the net increase in population for each alternative, additional firefighters to maintain that ratio is estimated in Exhibit 3.4-8.

**Exhibit 3.4-8. New Firefighters Required to Maintain Current Ratio**

Firefighters	Alternative 1: No Action	Alternative 2: Proposal
<b>Lindsay</b>	<b>0.7</b>	<b>3.5</b>

Source: MAKERS, 2024.

With an increase in residents and total population, there would be a corresponding rise in the demand for fire protection and emergency medical services. The [North County Fire & EMS Strategic Plan](#) outlines the planned investments to increase capacity through additional staffing, training, and equipment to ensure adequate response times and maintain service levels expected by the community.

# Alternative 1: No Action

## Parks

Alternative 1 No Action would result in the lowest increase in demand for publicly accessible parks and open space facilities. Development would be required to provide usable open space for the residents' use. If 25 or more units are developed in one project, mini-park(s) would also be required. With small, disconnected, piecemeal projects spread over the area, a connected and cohesive park and trail system is unlikely. Usable open space, though an important amenity for the residents, may not be publicly accessible. Existing parks and open spaces, particularly in the Gleneagle and Hilltop neighborhoods, may experience localized increases in use.

## Schools

Under Alternative 1, the Subarea would experience the fewest new housing units among the alternatives, resulting in the lowest student generation, about 40 students. Existing school facilities, including elementary, middle, and high schools, have sufficient capacity to accommodate the modest increase in students associated with this alternative.

## Police

Alternative 1 results in a moderate population increase in the Subarea, which requires an additional 0.5 or 1 officer to meet population demand. Existing and planned increases in police staffing levels are expected to adequately meet service needs without the requirement for significant expansion of facilities or personnel.

## Fire/Emergency Services

Alternative 1 No Action would produce the lowest demand for fire and emergency services, requiring 0.7 or 1 firefighter to meet population demand. The limited scale of growth under this scenario suggests that the current staffing and facility levels of fire departments and emergency responders would be sufficient to serve the Subarea, with minimal need for additional resources or infrastructure.

## **Alternative 2: Proposal, Preferred Alternative**

### **Parks**

Alternative 2 would generate the highest demand for new park and open space facilities. The proposal exceeds the AMC 20.44.032 Subarea Plans minimum requirement by dedicating 12% of the gross site area to parks and recreation, surpassing the 10% standard. This alternative would enhance recreational opportunities through a planned, connected trail and park network, improving access to green space and recreation. It also includes roughly 2-acre open space areas that could be dedicated to the City.

### **Schools**

Alternative 2 is projected to generate the highest number of new housing units, likely leading to an increase in the school-age population, an estimated 198 new students. The long-term capacity of local schools may be insufficient to accommodate the increase in the number of students, particularly at the elementary levels, though some capacity may be available at the middle school and high school level. Additional planning and potential expansion of school facilities would likely be required to serve the anticipated growth.

### **Police**

Alternative 2 projected housing and population growth would increase demand for police services. To maintain current level of service, 2.3 or 3 additional officers would be needed. Planning for phased increases in staffing and resources would help meet future needs and maintain public safety.

### **Fire/Emergency Services**

With an increase in housing stock and population, service calls are expected to rise. To maintain the current level of service, an estimated 3.5 or 4 additional firefighters would likely be needed. Fire Stations 46 and 48 are likely to experience the most significant rise in service demand.

Planned street infrastructure is designed to support emergency access, with accommodations for fire trucks and other emergency vehicles. New buildings incorporate fire-resistant materials, such as concrete patios and fiber cement siding, to enhance fire safety. Additionally, new street connections within the development will create a more connected street network, which will improve emergency response times and enhance service delivery, not only within Lindsay but also for adjacent rural residential areas in Snohomish County.

## 3.4.3 Mitigation Strategies

### Incorporated Plan Features

Existing staffing levels and facility capacity for parks, schools, police, and fire/emergency services are anticipated to adequately serve the population growth projected under both alternatives with minimal needs for additional resources and infrastructure improvements. As a result, no policies specific to these services are proposed in the Subarea Plan.

However, the Lindsay Subarea Plan includes policies and strategies that align with broader City initiative per AMC 20.44.032 Subarea Plans at improving access to parks and enhancing transportation infrastructure which improve service delivery and response time and efficient connections to schools and parks.

### Regulations and Commitments

AMC 20.44.032 Subarea Plans (applicable to Alternative 2) and AMC 20.52.030 - Residential usable open space and AMC 20.52.010 – Residential mini-parks (applicable to Alternative 1) require parks as a part of new residential development. More detail is included in the Parks existing regulations section.

The City and other agencies have developed plans that are regularly updated and coordinated to meet the expected growth of the community. These plans include:

- Parks and Recreation Master Plan
- Transportation Master Plan
- Arlington School District Capital Facilities Plan
- Arlington Police Department Strategic Plan
- North County Fire & EMS Strategic Plan

### Other Potential Mitigation Measures

- The City could consider adding additional police officers and staff to maintain the current level of service consistent with growth.
- As development occurs, the Fire District could reassess their plans to ensure adequate fire/emergency services staff and equipment are located close enough to Lindsay to maintain adequate response times.
- The City could consider requiring a mitigation agreement at the time a development application is submitted to address additional staffing needs and needed capital investments at stations serving the study area (e.g., stations, ladder trucks, or other).

- The City could condition Planned Action proposals during development review to develop protocols for fire aid and emergency medical services with the Fire District.
- The City and developers could explore WUI-appropriate building and landscape strategies for an urban area, such as home hardening (i.e., fire-resistant buildings and plants) and urban-appropriate defensible space.
- The City could coordinate with tribes and other agencies to facilitate wildfire suppression efforts through vegetation management.

### 3.4.4 Significant Unavoidable Adverse Impacts

Population growth will increase the demand for public services including schools, police, fire, and emergency services. Development would occur in phases in Lindsay and incrementally over the 20-year planning period citywide, and would be addressed in regular capital planning. Each service provider in conjunction with the City could evaluate levels of service and funding sources to balance expected growth; if funding falls short, there may need to be an adjustment to levels of service or growth as part of the Growth Management Act. With regular coordination, capital planning, and implementation of the proposed parks and open space improvements in the study area (or by providing required usable open space under Alternative 1), no significant unavoidable impacts are anticipated.

## 3.5 Utilities

### 3.5.1 Affected Environment

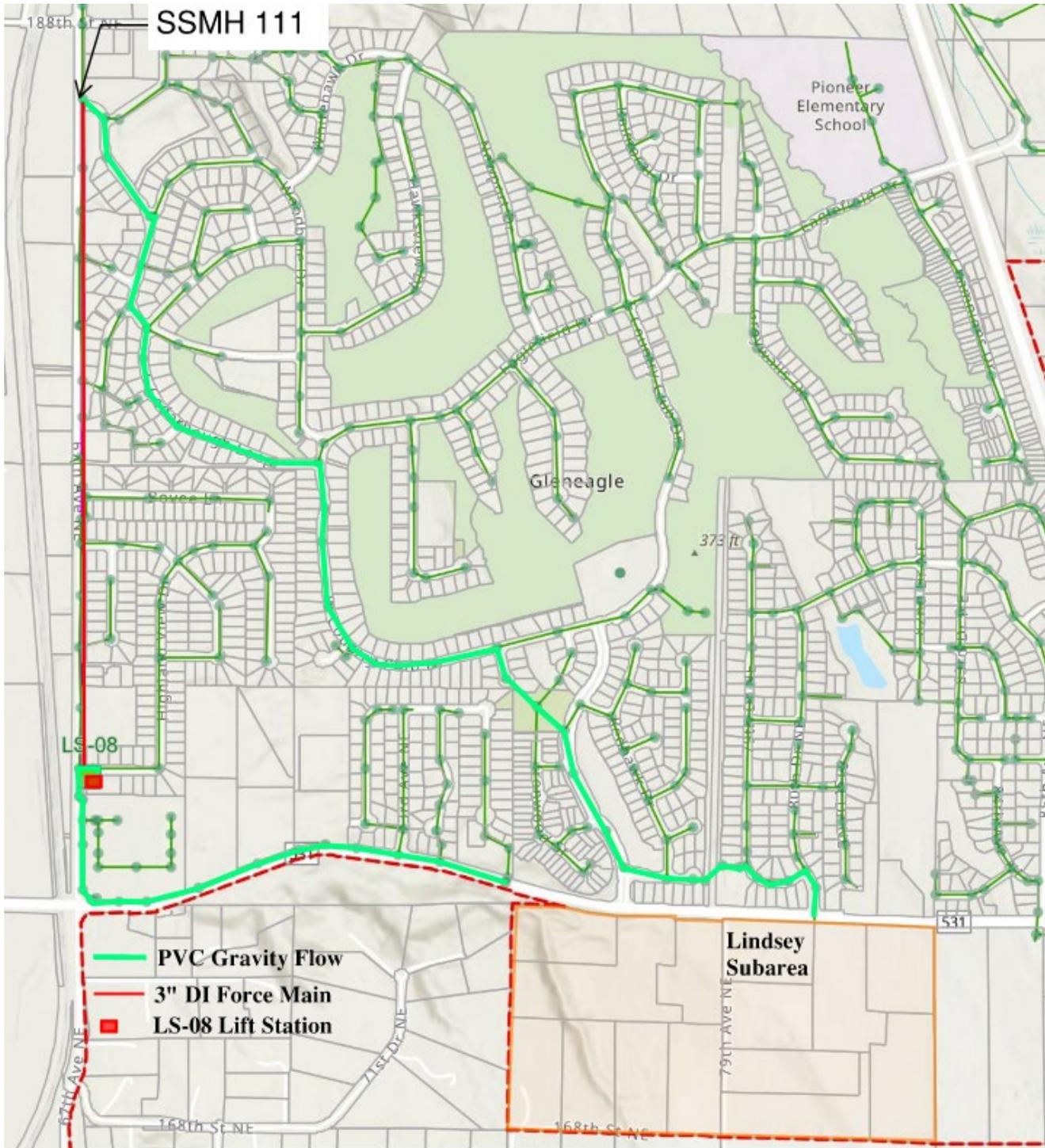
The Lindsay Subarea has utilities—electricity, natural gas, refuse service, telephone, cable, water, sewer, and stormwater—available at varying capacities to accommodate increased land use intensity. The City has recently completed updated modeling of its sewer and water infrastructure. This work evaluated system capacity for all pipe segments and the City’s 15 lift stations. However, the results of this modeling have not yet been made available to assess the infrastructure that could serve the Lindsay Subarea. While modeling is not required at this planning stage, it will be necessary before construction can begin on any portion of the Subarea. The modeling will estimate available capacity, evaluate alternative routes, and routing options like gravity versus lift station. It will also provide peak load flow analyses to support phased project development.

#### Sewer

Existing homes currently use on-site septic systems. Future sewer service will be provided by City of Arlington Public Works Sewer Division. The City has approximately 72 miles of gravity flow sewer mains and about 9 miles of force mains.

**Offsite sewer infrastructure.** There is a sewer pipe stub out at the intersection of 80<sup>th</sup> Ave NE and SR 531 (172<sup>nd</sup> St NE). From here it ‘spiderwebs’ its way through Gleneagle to the NW corner at Woodlands Way and 67<sup>th</sup> Ave NE where it discharges into the SSMH 111. SSMH 111 is a juncture of this described flow and the manhole where the force main from LS-08 also discharges. All route options for the Lindsay Sub Area end up and MH-111 where it flows north to the Treatment Plant.

Exhibit 3.5-1. Existing offsite infrastructure and optional routes



Source: City of Arlington, Land Technologies, 2025

## Water

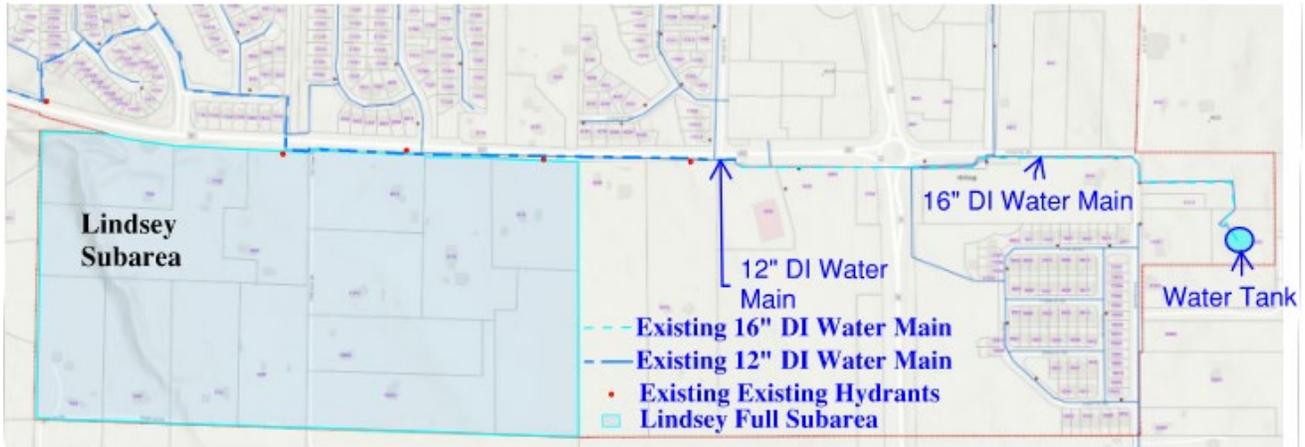
Existing homes in Lindsay use on-site domestic wells. Future water service will be provided by the City of Arlington Public Works Water Division. The City's Water Department maintains a Water System Plan (WSP) reviewed and approved by the Department of Health to assure provision of safe and ample water supplies for public health and fire protection.

The Arlington 2024 Comprehensive Plan Final Environmental Impact Statement states that the City is currently at maximum capacity and is planning numerous facility improvements, including increasing the production capacity of the water treatment plant. The City's LOS standard for water service, which is based on maximum demand projections, is 3,959 gallons per minute (gpm). Single family residential customers use an average of approximately 158 gallons per day per connection, and multi-family customers use an average of 773 gallons per day per connection.

**Demand.** Residential consumption accounts for nearly 3/4 of the total consumption in the City of Arlington (commercial, industrial, institutional, and municipal uses compose the rest). The City's Water Plan assumes a consumption rate of 80 gallons per day per resident. On an annual basis, the average single-family residence will use about 196 gallons for outdoor and indoor use each day. Indoor use at each residence ranges seasonally from about 160 to 180 gallons each day. During summer months with their intensive outdoor uses, single family residences can use 300 gallons each day. The greatest residential uses, then, are summer activities such as lawn and garden watering, car washing, and water-based recreation, which can average 120 gallons per day.

**Offsite water infrastructure.** The existing 12-inch ductile iron water main runs along the south side of SR 531 (172<sup>nd</sup> St NE) from east of the subarea (where it downsizes from a 16-inch pipe) to 79<sup>th</sup> Ave NE. It is in the 520 pressure zone and flows from the water storage tank located east of SR 9, just east of 91<sup>st</sup> Ave NE. There are three existing fire hydrants along the frontage. This infrastructure is currently adequate for fighting fires.

The watermain serves Hilltop and Gleneagle, teeing into Hilltop at 85<sup>th</sup> Ave NE and 80<sup>th</sup> Ave NE and into Gleneagle on the west side of the 79<sup>th</sup> Ave NE utility corridor. There is no water main along SR 531 (172<sup>nd</sup> St NE) west of 79<sup>th</sup> Ave NE; pipes "spiderweb" through Gleneagle before returning to SR 531 (172<sup>nd</sup> St NE).

**Exhibit 3.5-2. Offsite water system**

Source: City of Arlington, Land Technologies, 2025

Pressures at the hydrants along 172<sup>nd</sup> St NE along the Lindsay Subarea have been listed between 55 psi in the hydrant at the east end of the Subarea and as high as 101 psi at the hydrant at the NW corner of the site. This is currently adequate capacity for fighting fires. The difference in pressure may be attributed to the 100-foot difference in hydrant elevations.

## Dry Utilities

**Electricity.** Snohomish County Public Utility District (PUD) provides electricity. The PUD has 3-phase power along the north side of SR 531 (172<sup>nd</sup> St NE) and along 79<sup>th</sup> Ave NE. Individual homes have overhead power services from these mainlines to individual homes.

**Gas.** Puget Sound Energy has mainline gas in SR 531 (172<sup>nd</sup> St NE) but unlikely serves any of these existing homes.

**Refuse and Recycling.** Waste Management provides service to individual homes.

**Cable/telephone.** Zply provides telephone service and fiber optic cable for high-speed internet, with service lines along SR 531 (172<sup>nd</sup> St NE). Zply has stated they have adequate service available for this area. Xfinity (Comcast) and Spectrum provide cable service to this area and have infrastructure in SR 531 (172<sup>nd</sup> St NE). Some existing homes along SR 531 (172<sup>nd</sup> St NE) have Comcast service currently.

## 3.5.2 Potential Impacts

Threshold of Significance:

- Increased demand for drinking water, firefighting water flow, wastewater, and other utilities (power/gas/cable) beyond the capacity of existing and planned systems.

### Impacts Common to All

#### Sewer

Under both alternatives, the addition of homes (and potentially businesses) would increase flows into the sewer system from the Lindsay Subarea, through the Gleneagle and Hilltop neighborhoods to the Sewer Treatment Plant. The routing could take one of two paths to reach SSMH-111, as illustrated in Exhibit 3.5-1 Arlington's sewage treatment plan has sufficient capacity to serve the additional homes anticipated in Lindsay, however, offsite infrastructure upgrades to the sewer mains and lift stations may be needed.

#### Water

Under both alternatives, growth would increase water demand, both for home use and for fighting fires. According to the City of Arlington's reported water use data, the entire subarea will require an average of approximately 85,000 gallons of water per day. The City of Arlington, when considering planned improvements, has sufficient capacity in their system to support added water consumption from new development. Offsite infrastructure upgrades will depend on water system modeling.

#### Dry Utilities

Under both alternatives, growth would increase demand on power, gas, cable, and Waste Management. Dry utility providers, including Snohomish County PUD, Puget Sound Energy (natural gas), and Ziplly (cable) have indicated that service is available to the subarea. Existing infrastructure is located along SR 531 (172<sup>nd</sup> St NE), ensuring accessibility for future development.

#### Utility Installation

Most new utility infrastructure would be installed along or under the future road alignments. As a result, the environmental impacts of utility construction would largely overlap with impacts from clearing and grading for these roads. Utilities located within road alignments

would not add significant impacts beyond those already accounted for in the road construction.

In the eastern portion of the Subarea, short sewer segments may extend outside of roadways. These segments may affect wetland or stream buffers, and appropriate site-specific mitigation measures would be determined through project-level analysis.

## Alternative 1: No Action

Under Alternative 1 No Action, demand for water, sewer, and dry utilities would increase modestly. Existing sewer system and dry utilities capacity is expected to accommodate Alternative 1's level of growth. However, the water system may need upgrades. In addition, given the piecemeal and less compact development pattern likely under Alternative 1, utilities systems would be less efficient in terms of amount of pipe or line infrastructure constructed per home.

## Alternative 2: Proposal, Preferred Alternative

**Onsite water and sewer.** Under Alternative 2, the onsite system would be designed to accommodate anticipated water needs and sewer flows, cross Edgecomb Creek and enter its buffer areas where necessary without impacting water flow or quality, and connect to the existing offsite systems. The system would be designed for efficiency, maximizing homes served by infrastructure lines more than Alternative 1.

**Offsite sewer.** Under Alternative 2 Proposal, growth would increase demand for sewer capacity. Preliminary estimates indicate an increase in peak flows of approximately 306.8 gallons per minute (GPM) or 0.614 cubic feet per second (cfs).

Lindsay would be developed in phases, and each project would include new connections to the existing sewer system, adding flows along two routes. Arlington's sewage treatment plant has the capacity to accommodate these additional flows. However, the existing sewer main and lift station system that connects Lindsay to the treatment plant may need upgrades, especially for the additional flows expected for the full Subarea.

**Offsite water.** Alternative 2's greater level of growth would increase the demand on water and fire flows more than Alternative 1. Development will be required to ensure adequate water service including proper water pressure.

**Dry utilities.** With continued coordination with dry utilities service providers, no impacts are anticipated.

## 3.5.3 Mitigation Strategies

### Incorporated Plan Features

**Onsite sewer capacity.** Onsite sewer systems will be designed and constructed with the capacity to accommodate anticipated demand.

**Utilities in Edgecomb Creek and/or wetland/stream buffers.** Utilities outside of roadways will be designed and constructed to avoid and mitigate any impacts to wetlands and streams. These will be evaluated during project review.

**Power undergrounding.** Any improvements to SR 531 (172<sup>nd</sup> St NE) will underground electric and communication lines. Likewise, all new utilities throughout Lindsay will be underground.

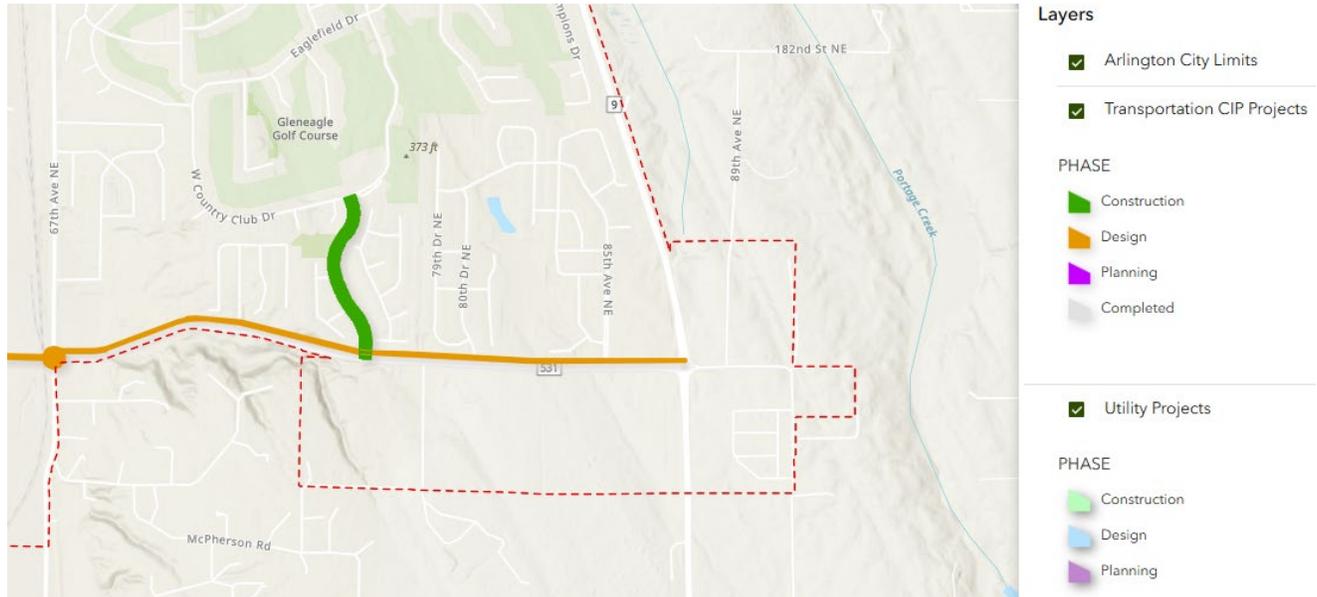
### Regulations and Commitments

Plans and regulations adopted at the time development permits are submitted will be applicable, such as:

- 1972 Clean Water Act (CWA)
- Phase II of the National Pollutant Discharge Elimination System (NPDES) permit program. Under this set of regulations, the City maintains measures to protect and improve runoff conditions in relation to the receiving waters.
- City of Arlington Municipal Code Title 13 – Water and Sewers
- City of Arlington Municipal Code Title 21 – Cable Systems Regulations
- City of Arlington Municipal Code Title 6 – Health and Sanitation
- City of Arlington Municipal Code Chapter 20.93 – Critical Areas Ordinance
- Snohomish County Code
- Snohomish County Drainage Manual 2021
- Stormwater Management Program Plan 2025
- City of Arlington Comprehensive Plan Update—Book 8: Capital Facilities and Utilities Supporting Analysis (November 2024)
- Electric vehicle (EV)-related regulations in AMC 20.114.415, WAC 51-50-0429, RCW 19.27.540, and RCW 46.08.185
- Arlington Water Systems Plan (2024)
- The Capital Improvement Plan includes the following City-funded improvements:
  - Project SM27 – Primary Interceptor (67<sup>th</sup> Ave Trunkline) Improvements (Phase 1 & 2), horizon year 2025

- 2025 Utility Improvement & Pavement Preservation Project to install new utility lines and preserve pavement surfaces (green line along Gleneagle Blvd in Exhibit 3.5-3) – construction began Summer 2025

**Exhibit 3.5-3. Arlington Capital Projects near Lindsay Subarea**



Notes:

- Green line - Install new utility lines and preserve pavement surfaces; construction started Summer 2025
- Orange line – Design and construct 12-foot wide trail along SR 531, estimated start date based on funding

Source: [Arlington, WA Capital Projects](#), City of Arlington, 2025

## Other Potential Mitigation Measures

The City could consider studying and updating its funding plan for water and sewer upgrades to prepare for growth.

## 3.5.4 Significant Unavoidable Adverse Impacts

Though existing water and sewer systems may be deficient in serving growth in the Lindsay Subarea, and potential impacts cannot be assessed until the City’s updated system modeling is available, continued capital facilities planning and coordination and construction of planned improvements are expected to result in no significant adverse impacts.

# 4 CORRECTIONS AND CLARIFICATION

## 4.1 Introduction

Corrections and clarifications to the Draft EIS are listed in this section and tracked with underlines (added text) and ~~strikethroughs~~ (deleted text) in the prior chapters.

Throughout the document, mentions of Alternative 2 Proposal have been updated to note that Alternative 2 is the "Preferred Alternative." Additionally, all references to this document as the "Draft EIS" have been removed and replaced simply with "EIS".

## 4.2 Chapter 1 Summary

**Page 2:** Added Introduction section to describe the organization of the Final EIS.

**Page 4:** Replaced study area map to reflect expanded Pending Project Area. The full Lindsay Subarea remains the same.

## 4.3 Chapter 2 Proposal & Alternatives

**Page 18:** Replaced study area map to reflect expanded Pending Project Area. The full Lindsay Subarea remains the same.

**Page 29:** Added Alternative 2 Proposal, Preferred Alternative Map to clarify that the Pending Project Area's site plan is likely to be developed in the near future with a similar land use layout, and that the Future Development Area has greater flexibility in its layout provided it follows the Lindsay Subarea Plan.

**Page 30:** Clarified that the Lindsay Subarea-wide site plan is an example illustrating general layout and circulation but would likely need updates to meet critical area buffer requirements in the Future Development Area.

**Page 31:** Updated the Expected Housing Units chart because expanding the Pending Project Area resulted in greater units in the Pending Project Area and fewer units in the Future Development Area. Clarified that the distribution of housing types is an example that meets the Subarea Plan intent, but that additional housing types (e.g., duplexes, triplexes, stacked flats), even if not explicitly mentioned, would also be allowed.

## 4.4 Chapter 3 Affected Environment, Impacts & Mitigation

### 4.4.1 Section 3.1 Land Use and Urban Form

No corrections or clarifications.

### 4.4.2 Section 3.2 Natural Environment

**Page 68:** Corrected cross-reference to the Plants and Animals section so that the cross-reference includes the heading and not the full paragraph text.

**Page 75:** Updated stream buffer mitigation measures to address the Pending Project Area and Future Development Area distinctly.

### 4.4.3 Section 3.3 Transportation

**Page 90:** Updated the trip generation analysis to include 10,000 square feet of commercial uses in addition to the residential already analyzed under Alternative 2. Given the small change (2% increase) to traffic, the traffic operations analysis was not revised.

**Page 92:** Updated the access information that would be provided along SR 531 (172<sup>nd</sup> St NE) as part of Lindsay's development.

### 4.4.4 Section 3.4 Public Services

No corrections or clarifications.

## 4.4.5 Section 3.5 Utilities

No corrections or clarifications.

## 4.5 Appendices

**Appendix H:** Added updated Pending Project Area site plan and mitigation.

# 5 COMMENTS AND RESPONSES

# 5.1 Introduction

This chapter includes the responses to public comments received on the Draft EIS. The Draft EIS was issued on September 26, 2025, and included a 30-day comment period, which ended on October 27, 2025. The City received 6 emailed comments during the Draft EIS comment period. Appendix G Comment Letters includes all comments received.

As shown in Exhibit 5.2-1, responses are provided for each comment and are intended to provide clarification and refinement of information presented in the EIS, and if needed, correct or update information in the EIS. See Chapter 4 for revisions and additions to the DEIS integrated in the Final EIS.

**Exhibit 5.2-1. Responses to Individual Comments**

No	Comment	Responses
<b>Agencies and Tribes</b>		
<b>1</b>	<b>Tamela Smart</b>	<b>Washington State Department of Archaeology and Historic Preservation</b>
<b>1a</b>	<p>Thank you for contacting the State Historic Preservation Officer (SHPO) and the Department of Archaeology and Historic Preservation (DAHP) with documentation regarding the above referenced project. An Archaeological survey was completed on the eastern portion of the Lindsay Subarea Plan project area and no protected cultural resources were encountered. We concur with the results and recommendations provided in the survey report. We recommend that the project proceed as planned with an Inadvertent Discovery Plan on-site and followed should cultural resources or human remains be encountered.</p> <p>We appreciate receiving any correspondence or comments from concerned tribes and other parties that you receive as you consult on this project.</p> <p>These comments are based on the information available at the time of this review. Should the project scope of work and/or location change significantly, please contact DAHP for further review</p>	Thank you for your comments; comments noted.
<b>2</b>	<b>Kelli Price</b>	<b>Washington State Department of Ecology</b>
<b>2a</b>	<p>Thank you for the opportunity to provide comments on the State Environmental Policy Act (SEPA) Draft Environmental Impact Statement (DEIS) for the Lindsay Subarea Plan. Based on review of the documents associated with this project, the Department of Ecology (Ecology) has the following comments:</p> <p>We support the goals and objectives for the Natural Environment stated in the Lindsay Subarea Plan.</p>	Thank you for your comments; comments noted.

No	Comment	Responses
	<p>Specifically, we support:</p> <ul style="list-style-type: none"> <li>▪ Protecting and enhancing wetlands, critical areas, and their buffers to maintain ecosystem services. Restoring the health of Edgecomb Creek and its tributaries.</li> <li>▪ Protecting fish and wildlife habitat in the subarea.</li> <li>▪ Preserving the Native Growth Protection Area (NGPA) and critical areas and their associated buffers.</li> <li>▪ Implementing a wetland mitigation plan to protect the wooded wetland.</li> </ul> <p>Partnering with the Tulalip Tribes to restore fish passage and ecological functions in Edgecomb Creek.</p>	
<b>2b</b>	<p>The wetlands delineated on this property would be waters of the state subject to the applicable requirements of state law (see RCW 90.48 and WAC 173.201A) and Section 401 of the Clean Water Act (33 USC §1341) and 40 CFR Section 121.2. If any direct wetland impacts are proposed, the applicant shall obtain all necessary state and federal authorizations prior to beginning any ground-disturbing activities or vegetation removal. To obtain state and federal authorization, you should provide:</p> <ul style="list-style-type: none"> <li>▪ A jurisdictional determination from the U.S. Army Corps of Engineers stating which delineated wetlands on the property are under federal jurisdiction.</li> <li>▪ A Joint Aquatic Resource Permit Application (JARPA) form for impacts to jurisdictional wetlands submitted to Ecology at <a href="mailto:ecyrefedpermits@ecy.wa.gov">ecyrefedpermits@ecy.wa.gov</a>.</li> <li>▪ For any non-federally regulated wetlands that the U.S. Army Corps of Engineers does not take jurisdiction for, submit a JARPA to Ecology at <a href="mailto:ecyrefedpermits@ecy.wa.gov">ecyrefedpermits@ecy.wa.gov</a> so we can issue an Administrative Order.</li> </ul> <p>A mitigation plan for unavoidable wetland impacts following the standards in Wetland Mitigation in Washington State - Part 1: Agency Policies and Guidance (Ecology Publication #21-06-003).</p>	<p>Thank you for your comments; comments noted.</p>
<b>3</b>	<b>Dawn Anderson</b>	<b>Washington State Department of Transportation</b>
<b>3a</b>	<p>I sent it to our hydraulic team, and they noted that there was not an accompanying hydraulic memo so they will need confirmation that the runoff will not affect WSDOT right of way.</p>	<p>Thank you for your comments. No stormwater from the project site will be routed to or within the WSDOT right-of-way (SR 531). All stormwater generated from the WSDOT right-of-way that currently drains toward the Lindsay Subarea will be managed along the existing drainage pathways or on the Lindsay site. With planned SR 531 improvements, the City and WSDOT will design stormwater infrastructure to manage drainage within the right-of-way or easements, according to the Western Washington Stormwater Manual.</p>

No	Comment	Responses
<b>3b</b>	The other comment was from our traffic group, “a new intersection at 79th Ave NE should be prohibited due to spacing to roundabout at 80th Drive NE, if this intersection is allowed it should be RIRO.”	The Preferred Alternative’s Planned Improvements (see page 92) and Subarea Plan have been updated to note that prior to SR 531 planned improvements, the 79 <sup>th</sup> Ave NE intersection may include full access. However, when SR 531 is improved with the roundabout at 80 <sup>th</sup> Dr NE, the 79 <sup>th</sup> Ave NE access must convert to right-in-right-out only.
<b>4 Liz Voytas</b>		<b>Department of Fish and Wildlife</b>
<b>4a</b>	The attached SEPA states, “ravine steep slopes, may meet the definition of a Landslide Hazard Area.” Please ensure erosion BMPs will be utilized and specify what BMPs will be used in sensitive areas (WAC 220-660-110).	<p>Only the parcels east of 79<sup>th</sup> Ave NE within the Pending Project Area have been fully assessed on the ground for critical areas and steep slopes. The culvert and natural fish passage barrier on parcels 31052600100800 and 31052600100300 have been assessed by SVC and Tulalip Tribe biologists to aid in determining the stream typing of Stream Z.</p> <p>All parcels west of 79<sup>th</sup> Ave NE—the Future Development Area—have only been assessed from adjacent roads and/or online resources. These parcels will be assessed at a later date once developers are assessing potential development opportunities.</p> <p>Steep slope setbacks will be implemented for lots and houses adjacent to steep slopes. All appropriate best management practices (BMPs) such as temporary erosion and sediment control (TESC) measures consisting of silt fencing, seeding of disturbed soils will be implemented during construction. We have updated the subarea plan strategy NE-14 to explicitly mention erosion control.</p>

No	Comment	Responses
<p><b>4b</b></p>	<p>The attached SEPA states that Edgecomb creek does not support fish life. The Subarea Plan Volume 1 states “Edgecomb Creek provides suitable fish habitat for important salmonid species, such as the Coho Salmon and Bull Trout, and an existing fish barrier could be removed.”</p> <ul style="list-style-type: none"> <li>▪ According to PHS mapping, Edgecomb Creek flows into The Middle Fork Quilceda Creek which houses multiple salmonid and other fish. This is critical habitat for fish and should be protected (WAC 220-660-100).</li> <li>▪ Removal of fish passage barriers is recommended to add to the mitigation plan.</li> <li>▪ The manmade dam inhibiting fish passage at the head of the river is scheduled to be removed in the summer of 2026. This will allow fish passage further up the creek and should be accounted for when considering buffer widths and future development in the vicinity.</li> </ul>	<p>The headwaters of Edgecomb Creek located on parcels 31052600101400, 31052600101500, 31052600100300, and 31052600100800 on the western area—the Future Development Area—is considered to be a Type F fish bearing stream throughout the stream’s entire reach within the Lindsay Subarea. However, Stream Z located on the northcentral and eastern portion of the Lindsay Subarea is considered a Type Ns stream due to a natural fish passage barrier on parcel 31052600100300 where there is a steep slope with no defined bed or bank that precludes fish passage. Additionally, there is a large, approximately 260-foot long elevated culvert that prevents fish passage upstream on parcel 31052600100800, and communication with the owner of parcel 31052600100800 indicated that they have no intentions of removing the 260-foot long culvert as it would require them to shut down their entire forest road construction and maintenance business. The 260-foot culvert and the natural fish passage barrier upgradient have been assessed by SVC and Tulalip Tribe biologists in the field, which led to the Type Ns determination for Stream Z upgradient of the large 260-foot culvert.</p> <p>The current culvert that transports Stream Z under 79<sup>th</sup> Ave NE is planned to be removed and replaced with a bottomless box culvert. Other culverts are anticipated to be removed and replaced as development occurs within the Lindsay Subarea.</p> <p>It is great to hear that the manmade dam inhibiting fish passage on the upper reach of Edgecomb Creek on parcel 31052600100300 is planned to be removed in 2026.</p>
<p><b>4c</b></p>	<p>The Subarea Plan notes that there are invasive plant species on site. Himalayan blackberries, Scotch broom, Canada thistle are noted.</p> <ul style="list-style-type: none"> <li>▪ We recommend adding invasive species removal to the mitigation plan.</li> </ul>	<p>Intensive invasive plant removal and control, along with the installation of native plantings is planned to be implemented within any mitigation areas within the Lindsay Subarea (see Subarea Plan strategies NE-2, NE-3, and NE-7 that include direction to remove invasive species). Details on specific mitigation proposals and invasive plant control will be specified in conceptual and final mitigation plans for each proposed development as the Lindsay Subarea is built out over time. For example, the Pending Project Area parcels on the eastern portion of the site have proposed a robust mitigation plan that involves creating approximately 1.25 acres of wetland, and enhancing and restoring all the wetland and stream buffer areas located within the proposed development. All future development proposals will also be required to submit and implement mitigation plans.</p>

No	Comment	Responses
<b>Individuals</b>		
<b>5 Annet Gamble-Olson</b>		
<b>5a</b>	I am objecting to another huge development being allowed in Arlington that has insufficient roads and services before the houses are put in.	<p>Thank you for your comments. The planned transportation system, as analyzed in section 3.3 Transportation, is adequate for the level of growth planned in Lindsay. In addition, the proposed parks, trails, and street network in Lindsay would improve access and connectivity to parks and services for a greater proportion of Arlington residents.</p> <p>Public services, including parks, schools, police, fire/emergency services, and utilities, are expected to accommodate Lindsay’s projected growth with continued service provider-City coordination, capital planning, and implementation of proposed improvements (see sections 3.4 Public Services and 3.5 Utilities). Project-level permitting will continue to be conditioned on adequate utility capacity, guided by updated City modeling (see section 3.5.2 Utilities, Potential Impacts).</p>
<b>5b</b>	I need more information about where this development is going in and how it will affect me at [address redacted]	<p>Thank you for your interest. All notice requirements have been and will continue to be satisfied. The commenter has also been made a party of record. In addition, the commenter was provided a link to the City of Arlington Lindsay Subarea Plan website for the subarea plan and additional project documents.</p>
<b>6 Shannon Oquist</b>		
<b>6a</b>	I am writing to express my concern regarding a notice we received about an environmental impact and a proposed growth plan. There are already environmental impacts to the continued building in and around Arlington. Wildlife is running out of places to live, and things like trees and shrubbery are disappearing to build apartments and commercial buildings that are sitting empty. Any amount of building also poses risk to ground water, and air pollution when trees are removed.	<p>Thank you for your comments. The City of Arlington is required to plan for projected population growth, and Arlington’s projected trends show that additional development is needed to house the growing population (see the Comprehensive Plan’s <a href="#">Land Use Forecasts</a>). Though there are some vacancies in Arlington, these are due to unique circumstances or typical vacancy rates for a healthy market and do not indicate a lack of need for homes.</p> <p>The proposed neighborhood development and associated environmental mitigation and restoration that will occur are anticipated to achieve a net lift in ecological functions and values within the Lindsay Subarea. Wildlife corridors will be preserved and enhanced within the riparian management zones adjacent to the streams within the Subarea. Currently, the stream corridors and wetlands onsite are largely degraded due to historic cattle grazing and ongoing mowing which has prevented native trees and shrubs from establishing in many of the riparian zones and wetlands within the Subarea. Future development will result in planting and</p>

No	Comment	Responses
		<p>maintaining the riparian corridors, wetlands and associated buffers with native trees and shrubs which will significantly improve ecological functions and habitat diversity within these natural areas. The anticipated mitigation and ecological restoration within the Subarea are anticipated to create additional wetland area, improve water quality within the streams through native plantings and removing failing septic systems, and to enhance degraded wildlife corridors.</p>
<p><b>6b</b></p>	<p>This does not even take into consideration the traffic impacts that such building is having on the citizens of Arlington.</p>	<p>Refer to Gamble-Olson comment 5a regarding traffic impacts.</p>
<p><b>6c</b></p>	<p>As a tax paying citizen in the city of Arlington, I would like to express my opposition to any further building. The Eagle Heights Neighborhood only has a few small wooded areas as is, please leave them alone</p>	<p>Refer to Oquist comment 6a regarding wildlife, trees, and habitat.</p>

# 6 ACRONYMS & REFERENCES

## 6.1 Acronyms

AMC = Arlington Municipal Code

CPP = Snohomish Countywide Planning Policies

DNR = Department of Natural Resource

EV = Electric vehicle

ESA = Endangered Species Act

FDA = Future Development Area

NCRS = Natural Resource Conservation Service

NGPA = Native Growth Protection Area

NWIFC = Northwest Indian Fisheries Commission

PSRC = Puget Sound Regional Council

PPA = Pending Project Area

PUD = Snohomish County Public Utility District

SWIFD = Statewide Washington Integrated Fis Distribution

USACE = U.S Amry Corps of Engineers

WDFW = Washington Department of Fish and Wildlife

WSDOE = Washington Department of Ecology

WSDOT = Washington Department of Transportation

## 6.2 References

Hruby and Yahnke. 2023. Washington State Wetland Rating System  
<https://apps.ecology.wa.gov/publications/documents/2306009.pdf>

National Academies of Sciences, Engineering, and Medicine. 2022. *Highway Capacity Manual 7th Edition: A Guide for Multimodal Mobility Analysis*