

Appendix F: Environmental Review

F-1: Supplemental Environmental Impact Statement -- 2015

F-2: Response to Comments -- 2015

F-3: Addendum – June 2017

On April 22, 2015 the Arlington Comprehensive Plan Draft Update was issued with a Supplemental EIS included as Appendix F-1. Comments were due on June 8, 2015. One comment letter was received from the Puget Sound Regional Council. It is included on the following pages, with responses from the City (F-2). Some changes were made to the Plan where noted.

An Addendum to the SEIS (F-3) has been issued after certain adjustments were made in June 2017.

Appendix F-1:

City of Arlington Urban Area Comprehensive Plan Supplemental Environmental Impact Statement (SEIS) -- 2015

CITY OF ARLINGTON URBAN AREA COMPREHENSIVE PLAN SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (SEIS)

Description of Proposal: The City of Arlington plans under the Washington Growth Management Act (GMA) (RCW 36.70A.). The Act requires that cities periodically update their plans with current information, new rules and revised city codes. Arlington adopted its last plan in 2008, with forecasts and policies geared toward a Year 2025 vision. This updated Plan has a “horizon year” of 2035 and embraces the Puget Sound region’s Vision 2040.

Requirements for an SEIS are governed by WAC 197-11-620:

An SEIS shall be prepared in the same way as a draft and final EIS (WAC 197-11-400 to 197-11-600), except that scoping is optional. The SEIS should not include analysis of actions, alternatives, or impacts that is in the previously prepared EIS.

The following document supplements the Final Environmental Impact Statement adopted as part of the 2008 Plan adoption.

Objectives of the Proposal: This Comprehensive Plan was developed in accordance with the GMA to address growth issues in the City of Arlington and the adjacent UGA. It represents the community's policy plan for growth over the next 20 years. It will assist the management of the City by providing policies to guide decision-making for growth, development and public services. Cities are required to update their plans every ten years. The original Arlington GMA Plan was adopted in 1994 and planned through the year 2015. The City adopted an updated Comprehensive Plan in 2004 designed to carry the community forward through 2025. This update plans for a target year of 2035.

Proponent: City of Arlington
238 N. Olympic Avenue
Arlington, WA 98223

Phone: 360.403.3441

Fax: 360.403.4605

E-Mail: administration@arlingtonwa.gov

Location of Proposal: Arlington Urban Growth Area (UGA)

Lead Agency: City of Arlington

EIS Required: A Supplemental Environmental Impact Statement (SEIS) was deemed necessary under RCW 43.21C.030(2)(c). The SEIS contains new information and analysis, but also builds on data and analysis contained in previous environmental documents prepared as part of the 2008 Comprehensive Plan.

The lead agency identified the following elements of the environment for discussion in the Supplemental EIS:

- I. Natural Environment:** Topography, soils, erosion, air quality, surface and groundwater, public water supplies, plant and animal habitat, fisheries, energy and natural resources.
- II. Built Environment:** Population, housing and employment through year 2035; land use, housing, recreation, transportation, public services, and utilities.

Purpose of the Supplemental EIS

The purpose of this Supplemental EIS is to assist the public and agency decision-makers in considering future decisions on land use patterns and Comprehensive Plan goals, policies, and development regulations for the City of Arlington as part of the Comprehensive Plan update. These broad decisions will provide direction and support for more specific actions by the City, such as capital improvements and implementing regulations.

The SEPA review of the Plan is a “planning level” analysis as opposed to a “project level” analysis. The latter is done for specific projects on specific sites and is much more detailed. A planning-level analysis is more general in nature. SEPA requires that analysis be as specific as the information available. Because the comprehensive plan is more general in its discussion of topics, the SEPA analysis will be more general than what might be found in a project level SEPA review. It is assumed that as specific projects or decisions are made in the future, more detailed information will be provided, and that the policies of this Plan will be considered in decision making. This is referred to as “Phased Review” and will be a part of future decision making using the 2015 updated Plan.

Programmatic Analysis

This Supplemental EIS provides qualitative and quantitative analysis of environmental impacts appropriate to the general nature of the Comprehensive Plan amendment proposals. The adoption of comprehensive plans or other long-range planning activities are classified by SEPA as a non-project (i.e. programmatic) action. A non-project action is defined as an action that is broader than a single site-specific project and involves decisions on policies, plans or programs. An EIS for a non-project proposal does not require site-specific analysis; instead the EIS discusses impacts and alternatives appropriate to the scope of the non-project proposal and to the level of planning for the proposal (WAC 197-11-442).

Integrating Environmental Impact Analysis with Growth Management Planning

The Washington State Environmental Policy Act (SEPA) requires all State and local agencies to use an interdisciplinary, integrated approach to build environmental factors into planning and the decision-making processes.

During the development of this Comprehensive Plan update, the City of Arlington is required to consider the potential environmental impacts of plan policies and alternatives. Cities and counties planning under GMA may address environmental concerns during the growth planning process by combining the requirements of GMA with those of SEPA, as specified by 1995 amendments to Chapter 197-11 of the Washington Administrative Code (WAC), SEPA Rules.

Cities and counties planning under GMA have the option of combining analyses, documentation and public involvement required under environmental and growth management laws. This results in an “integrated document”, satisfying both GMA and SEPA requirements in one document, with the Environmental Summary serving as the Supplemental Environmental Impact Statement (SEIS) for this Plan.

A major benefit of this integrated approach is a more predictable process for development review. Evaluation of environmental choices during the planning process should facilitate analysis of potential environmental impacts as a result of development. This should result in more certainty and predictability for developers and landowners in association with future development proposals. The Comprehensive Plan and subsequent implementing regulations should therefore result in a timelier and more focused environmental review process.

Public Comment

Public workshops will be held by the Planning Commission on at City Hall, 223 N. Olympic Avenue, Arlington, Washington. The dates are April 21st, May 5th, May 18th (with Airport Commission), and May 19th. A public hearing will be held by the Planning Commission on June 2nd. Comments received at those meetings will be incorporated into the Final EIS. The June 2nd public hearing may result in a recommendation to the City Council which will also be incorporated into the Final EIS.

Analysis of Alternatives

No-Action Alternative

If the City Council takes no action to adopt a new comprehensive plan, the existing City of Arlington Comprehensive Plan adopted in 2008 will remain in effect. This alternative would continue to have conflicting growth targets for 2025 and 2035, inconsistencies between policies and improvement plans for Transportation and Utilities, buildable lands and other elements required to be reviewed as part of the mandatory 2015 update.

As a result, State funding of roads, parks, utilities and other infrastructure through the Public Works Trust Fund, PSRC, IAC and other sources could be denied. Other sanctions could be imposed if the Growth Management Hearings Board finds the City of Arlington to be out of compliance with State-mandated update requirements.

Proposed Action

The Proposed Action is adoption of the City of Arlington 2015 updated Comprehensive Plan. The 2015 updated Plan and Supplemental Environmental Impact Statement (SEIS) provide an updated land use plan and policies to address growth for a 20-year planning period through the year 2035 within the Arlington Urban Growth Area. The Plan includes updates to certain sections of the 2008 Plan and to ensure internal and external consistencies with Sewer, Water, Transportation Vision 2040, Transportation 2040 Plans; and with Multi-County and Snohomish County countywide planning policies.

A revised Critical Areas Ordinance using Best Available Science will also be adopted.

The Proposed Action consists of updates to the following components:

- Chapter 1: Introduction**
 - Chapter 2: Maps and Figures**
 - Chapter 3: Goals and Policies**
 - Chapter 4: Description of Planning Area**
 - Chapter 5: Land Use Element**
 - Chapter 6: Housing Element**
 - Chapter 7: Parks and Recreation Element**
 - Chapter 8: Transportation Element**
 - Chapter 9: Capital Facilities and Public Services Element**
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- Appendix A: Glossary of Terms**
 - Appendix B: Essential Public Facility Siting Process**
 - Appendix C: Consistency Matrix - Countywide Planning Policies**
 - Appendix D: Comprehensive Plan Checklist**
 - Appendix E: Natural Environment**
 - Appendix F: Draft Supplemental Environmental Impact Statement**
 - Appendix G: Response to Comments on DSEIS**
 - Appendix H: Public Participation Program**

II. FACT SHEET

Proposed Action:	Adoption of an update of the City of Arlington’s Comprehensive Plan as required by the Growth Management Act (GMA). The updated Comprehensive Plan provides an updated land use plan and policies to address growth for a planning period through the year 2035 within the Arlington Planning Area. The Plan includes updates to certain sections of the 2008 Plan. Development Regulations will be updated in 2015 to implement the policies of the updated Plan.
Location of Proposal:	The City of Arlington and its surrounding unincorporated urban growth area (UGA). Arlington contains about 6600 acres of land within its current City limits. There is a pending proposal for a 239-acre addition to Arlington’s UGA under consideration as part of the County’s Docket XVII process, west of I-5.
Proponent:	City of Arlington
Lead Agency:	City of Arlington 238 N. Olympic Avenue Arlington, WA 98223 Phone: 360.403.3441 Fax: 360.403.4605
Responsible Official:	Paul Ellis, SEPA Responsible Official
Required Approvals:	Planning Commission recommendation City of Arlington City Council – Adoption Washington Department of Commerce -- Acceptance
EIS Authors:	City of Arlington Shockey Planning Group
Date of Supplemental EIS Issue:	April 22, 2015
Date of Final Action:	July 6, 2015
Location of Prior Environmental Documents and Background Information:	City of Arlington Arlington, WA

Cost of Document: CD copies are available for free at City Hall at the address above. The document is also available to view on the City's website at: www.arlingtonwa.gov.

SEPA Distribution List (To be Updated)

Federal Agencies

Bonneville Power Administration (BPA)
 Bureau of Indian Affairs
 Federal Aviation Administration
 Federal Emergency Management Agency (FEMA)
 National Marine Fisheries Service
 Natural Resource Conservation Service
 NOAA Fisheries
 NOAA Northwest Regional Office
 U.S. Army Corps of Engineers
 U.S.D.A. Forest Service
 U.S. Environmental Protection Agency
 U.S. Fish and Wildlife Service

State Agencies via e-mail from Department of Commerce (reviewteam@commerce.wa.gov)

- Department of Agriculture
- Department of Archeology and Historic Preservation
- Department of Ecology
- Department of Fish and Wildlife
- Department of Health
- Department of Natural Resources
- Department of Transportation
- Parks and Recreation Commission
- Washington State Parks and Recreation

Regional Agencies

Puget Sound Clean Air Agency
 Puget Sound Regional Council
 Puget Sound Water Quality Action Team
 Snohomish County

Local Government, Tribes and Utilities

Arlington Fire District
 Arlington School District
 BNSF Railway Company
 Cascade Natural Gas
 City of Arlington Police Department
 City of Arlington Parks and Recreation Department
 City of Arlington Public Works Department
 City of Marysville

City of Stanwood
City of Darrington
Comcast
Frontier
Lakewood School District
Puget Sound Energy
Snohomish County Planning and Development Services
Snohomish County PUD
Snohomish County Sheriff
Snohomish Health District
Stillaguamish Tribe
Tulalip Tribe

Organizations and Interest Groups

Puget Sound Partnership

Media

Arlington Times
Everett Herald

Libraries

Sno-Isle Regional Library, Arlington Branch

SEPA Approach

The last complete update of the Comprehensive Plan occurred in 2005, which was an update of the original 1995 Plan. The Plan was further updated in 2008 with incorporation of the revised Stormwater Management Comprehensive Plan; the Sewer Comprehensive Plan; and the Comprehensive Water System Plan. The Capital Facilities Elements of the Comprehensive Plan were updated accordingly.

The following is a comparison of the 2005 and 2015 environmental impacts and mitigation measures presented in a format similar to the 2005 document. As mentioned, the 2015 Plan is an integrated SEPA/GMA document.

Following is a list of GMA and SEPA elements and their treatment in this 2015 Comprehensive Plan update.

Update Topics

Element	Compliant	Update	New
Land Use			
Consistency with countywide planning policies		X	
Consistency with multi-county planning policies (PSRC)		X	
Land use map		X	
Population projection uses latest forecast		X	
UGA review (required every 8 years)			X
Reasonable measures adopted if needed	X		
Planning for physical activity		X	
Public use lands – All documented		X	
List of acquisitions – Current and Planned	X		
No incompatible uses near airports		X	
Stormwater planning		X	
BAS used to designate and protect critical areas	X		
Critical Aquifer Recharge Areas (CARA) to protect water quality and quantity	X		
TDR or PDR program for forest or agricultural lands inside UGAs		X	
Forest lands designated	X		
Agricultural lands designated	X		
Limit accessory uses on agricultural lands	X		
Review mineral resource lands	X		
If applicable, development outside UGA consistent with RCW	X		
Housing			
Inventory of existing housing and projected housing		X	

Update Topics

Element	Compliant	Update	New
needs using latest population projection			
Goals, policies for housing		X	
Identify sufficient land for housing		X	
Affordable housing planned	X		
Capital Facilities			
Inventory of existing facilities		X	
Adopted LOS	X		
Forecast of future needs		X	
Proposed locations and capacities of expanded or new facilities.		X	
Six-year funding plan consistent with comp plan		X	
Impact fees used only for projects included in the CFP	X		
Land Use reassessment policy included	X		
Utilities			
General location and capacity of existing and proposed facilities		X	
Rural Element (NA)			
Transportation			
Transportation inventory		X	
Levels of service for all facilities; local, regional, and state		X	
Concurrency	X		
TDM Strategies	X		
Bicycle and pedestrian planning		X	
10-year Traffic forecast		X	
Land use element assumptions used to forecast travel		X	
Future needs		X	
Funding program		X	
Funding analysis		X	
Intergovernmental coordination	X		
Plan certified by RTPO		Pending	
Shoreline Management			
SMP goals and policies	X		
Essential Public Facilities			
EPF identification and siting process	X		
No preclusion policy	X		
List considered	X		

Update Topics

Element	Compliant	Update	New
Consistency			
CWPPs		X	
Internal consistency	X		
External consistency	X		
Public Outreach	X		
Broadly publicized plan amendment process	X		
Plan amendments no more than once a year			

ENVIRONMENTAL SUMMARY

The various chapters and appendices of the updated plan are integrated with SEPA elements and are updated as follows for this SEIS. A review of the 2005 EIS document is summarized along with the nature of 2015 updates.

	2025 Population Projection	2035 Projection	DESCRIPTION OF EXISTING CONDITIONS
			This update uses the same planning subareas and updates land use, housing, economic and other SEPA-related information. These are discussed in Chapters 4-6.
Alt 1	24,487	24,937	
Alt 2	24,487		
Alt 3	30,538		

SCOPE OF ENVIRONMENTAL ANALYSIS

MITIGATING EFFECTS OF IMPLEMENTING GROWTH MANAGEMENT

As with 2005, this Supplemental EIS evaluates at a *programmatic* level the current conditions and potential impacts of changes to past assumptions. The integrated analysis identified updated development forecasts, determined where 2035 growth will occur, matched locations with the available or planned infrastructure, avoided critical areas and identified other mitigation measures that are embodied in the capital facilities plan, goals, policies and implementation measures.

ENVIRONMENTAL TOPICS**Natural Environment**

2005 Air Quality Resources Discussion

- Construction Impacts
- Localized Transportation Impacts at Congested Intersections
- Emission Control and Permitting for Stationary Sources
- Regional Air Quality Impacts Due to Transportation
- Residential Wood Burning
- Burning Brush and Other Vegetation

The 2005 Plan found that regional air quality impacts caused by population growth and transportation emissions would not be significant because the forecasted population forecasts were within the forecasted emissions for the four-county region. In 2015, population, housing, employment and traffic forecasts are within estimates by Vision 2040.

2005 Biological Resources Discussion

The 2005 Plan found that under all alternatives studied, there would be a reduction in the amount of wildlife habitat in the City and proposed UGA over time as currently planned projects and future development projects are implemented.

- Habitat types most likely to be lost would be forested and agricultural/grassland/pasture.
- Existing agricultural/grassland/pasture may be converted to vegetated suburban residential or a developed condition.
- Development of currently vacant or underdeveloped parcels could lead to fragmentation of wildlife habitat.
- Indirect effects could include:
 - a reduction in wildlife habitat quality and function due to increased human disturbance.
 - increases in noise and light in adjacent wildlife habitat.
 - increases in predatory species (crows, etc.).
 - an overall decrease in biodiversity and habitat.

Wetlands would receive some level of protection under the City's environmentally critical area regulations (AMC 20.88).

The 2005 Plan said that increased densification in the Arlington and other UGAs would benefit wildlife and wildlife habitat regionally by relieving pressure to develop more rural areas currently outside of the UGA. In addition, goals and policies would help minimize potential impacts to wildlife and wildlife habitat. These policies have been retained in 2015. Several existing regulations, in effect in 2005, help to minimize or avoid impact to wildlife and wildlife habitat, including sections of AMC 20.88, Environmentally Critical Areas, which require that such resources be protected.

The former plan called for low-impact development, with emphasis on native plant retention to retain habitat. In 2015, the City is implementing regulations that allow the use of Low Impact Design (LID) for the management of stormwater run-off including Best Management Practices with preferred designs and optional types of LID systems. The City has implemented LID projects such as rain gardens and the large old-town Stormwater Wetland as pilot projects that landowners can visit to consider if that may work for their project. These methods will continue into the next planning period.

2005 Surface Water/Water Quality Discussion

The 2005 Plan noted that, as a programmatic EIS, no direct impacts would occur to water resources, but that the Land Use map and development policies would direct development into managed drainage basins. The Preferred Alternative would indirectly affect surface water resources when development proposals affected the landscape patterns and surface water protections.

Stream channel protections were identified including:

- Strategies for facilities that preserves and supplements the natural drainage ways and other natural hydrologic systems to minimize runoff impacts from development.
- Federal NPDES regulations as well as City stormwater regulations that require stormwater quantity and quality controls.
- AMC 20.88, Environmentally Critical Areas which defines stream, flood hazard area, and other critical area protections and applies regulations to adjacent developments.
- The City's SEPA authority and City codes that require mitigation for impacts to drainage, habitat, and water quality.
- AMC 13.28 containing stormwater management standards that require the detention of stormwater for major development activity.
- The City's adherence to the Stormwater Management Manual for Western Washington.
- Use of drainage systems that mimic natural drainage systems, such as vegetated swales, wet ponds, and created wetlands.
- Protective detention standards that require new development to detain larger volumes of stormwater runoff on their sites and in such a way as to better mimic the pre-developed stormwater patterns.
- More protective water quality standards, such as more protective requirements for water quality BMPs as identified in the City's NPDES permit.
- Reduced impervious surface area policies
- Drainage/treatment systems on a sub-basin level that optimize treatment and manage existing and future stormwater flows.
- Retrofit of existing detention facilities to improve water quality treatment
- Channel specific improvements to correct existing erosion problems and reduce the potential for increased erosion in the future.
- Stormwater quality monitoring to evaluate the effectiveness of stormwater practices and standards.

These measures are in place in 2015, with updates to the Stormwater Comprehensive Plan, development standards or proposed capital improvements.

2005 Groundwater Resources Discussion

The 2005 Plan called out the aquifer under the Arlington Airport as a key concern. The depth of the is approximately 150 feet¹ and the 2015 Plan finds that most uses should not affect the water quality if best management practices are used.

In terms of quantity, drinking water in the UGA is provided by Arlington. Some of this water is derived from wells. The Haller well supplies approximately 92%, while the airport well is 2%, and Snohomish County PUD provides 6%. Additionally, some residents use wells as their main source of drinking water.

Impacts to groundwater quality result primarily from land uses that produce higher levels of non-point source pollution, such as urban runoff or residential zoning with septic disposal; and land uses associated with point source pollutants, such as industrial facilities and stormwater infiltration facilities.

Review for potential groundwater contamination is performed at the time of development permit application review through the SEPA process. Additionally, the City's Environmentally Critical Areas regulations protect wetlands and aquifer recharge zones providing groundwater replenishment and filtration. And the WCP has a watershed and wellhead protection plan.

The 2005 Plan included potential mitigation measures such as case-by-case SEPA review, code requirements under AMC Chapters 20.64 (Drainage, Erosion Control, Storm Water Management), AMC 20.88 Part IX (Aquifer Recharge Areas). Those rules remain in effect in 2015.

Table E-7 lists other laws related to surface water quality and quantity that are in effect in Arlington and are part of all project reviews.

2005 Natural Disasters Discussion

Hazardous area protection and mitigation has heightened importance since the 2014 Oso disaster. While the topic was discussed in the 2005 Plan, the updated Plan and related codes were reviewed to ensure that the Land Use and other maps were sensitive to those conditions. AMC 20.88 (Critical Areas) provides local regulatory control of streams, wetlands, lakes, fish and wildlife habitat, and erosion-prone and geologically hazardous areas. It defines resource values, buffers and setback requirements, and other appropriate protective measures. The Natural Hazards section of Appendix E provide information on other susceptibilities and their mitigation.

The Island Crossing area was a topic of flood hazard discussions in the 2005 Plan. The entire area falls within the Stillaguamish 100-Year Floodplain. The Plan observed that any new

¹The Ground-Water System and Ground-Water Quality in Western Snohomish County, Washington; U.S. Geological Survey-Water Resources Investigations Report 96-4312.

development would need to build to FEMA's requirements. The Lane dealership land was a concern at the time, but has since (2015) been issued development permits based on floodplain mitigation and other construction requirements. Other developments may be required to perform additional modeling of anticipated flood impacts for project proposals in the floodplain.

Human Systems/Built Environment

A major goal and significant work effort in 2013-2015 has been to produce an update of the 2005 Plan to ensure that the land use, housing, employment, public facilities and other community elements are updated to remain current. The City embraces the fundamentals of what was adopted in 2005 because of its exhaustive effort to define a vision based on citizen consensus. There was no attempt in 2015 to change the vision or direction of the community. In line with Growth Management requirements, the principal objective has been to update information to "stay the course" in implementing the goals and vision of 2005.

As in 2005, there are not great changes in the existing plan, with a few exceptions. The main differences involve integration of the West Arlington Subarea Plan (WASA), interim density standards for the Brekhus/Beach area addition of the King-Thompson area to the Urban Growth Area (County docket: ARL3). Neighborhood Planning Subareas remain the primary planning units, with goals, policies, land use and other elements keyed to each. No changes are proposed to lands along the only Shoreline of Statewide Significance, that being the bank of the Stillaguamish River. No significant changes are anticipated in the policies or regulations governing development. Thus, there should be no significant changes in the type of development already allowed.

The 2015 Plan has been reviewed against the multi-county planning policies of Vision 2040, the Snohomish Countywide Planning Policies (2013), the County's Housing ("HO-5) Study and numerous other documents adopted by reference (Page 1-4). Care has been taken to meet the internal and external consistency standards of GMA.

In each of the elements (Chapters 3-9) and appendices, we integrate how each differs from the 2005 assumptions and how each change is consistent with SEPA-based mitigation or local, regional, State or federal policy. The City's integrated SEPA/GMA plan has also been reviewed against the current draft of the County's Draft EIS and is consistent, again with the exception of the proposed King-Thompson (ARL3) UGA expansion. A final decision on that matter will, by mutual agreement with the County, be taken up after the June adoption of both plans.

2005 Public Utilities Discussion

Arlington does not control all public utilities—only water, sewer, solid waste, and storm drainage. The other utilities are provided by either public utility districts or private companies, each of whom must analyze the environmental impacts of their actions in providing additional products or services. Thus, this analysis will only address those utilities and service provided by Arlington. The other utilities were consulted for the 2015 update and

are prepared to provide services to the current and near term population levels. Each continually assesses its needs and presumably will alert the City of any potential service shortfalls. None have been indicated.

The City had several utility plans in effect in 2005 and those remain in effect today, after recent updates.

- Water Comprehensive Plan
- Wastewater Comprehensive Plan
- Stormwater Comprehensive Plan

The results of these plan updates have been integrated into the Comprehensive Plan and are discussed in Chapter 9.

The key utility concern in 2005 was the effect of utility extensions outside the UGA on urban growth in rural areas. Current state and local codes and policies prohibit sewer extensions beyond UGA boundaries. Water can be extended into the City’s water service area, but is not considered an instigator of growth.

Another 2005 concern was the effect of utility extensions across environmentally sensitive areas, impact on riparian buffers and water quality. As discussed in Appendix E, several of these areas are healing through the maturing of past stream and wetland restoration projects. In 2015, the City recognizes the importance of minimizing further impacts. Development projects are reviewed for potential impacts to wildlife and habitat through the SEPA process. The City's adopted Environmentally Critical Areas regulations (AMC Chapter 20.88) are intended to protect wildlife and habitat. The rules prohibit the installation of utilities within critical areas unless necessary and then only under certain design considerations to minimize impacts.

Following are additional comments of particular relevance to the updating of the City’s 2005 environmental review of its Plan:

	2005	2015
Transportation	Avoid new roads through major Recommended road improvements	Same policy Table 9-3
Noise	65 dB noise contour within airport	Same status
	Incidental and temporary urban noises acceptable	AMC §20.44.210 (Noise)

Recreation and Open Space -- Need --	Regional Parks	0.0 acres	Regional Parks	0.0 acres
	Community Parks	65.8 acres	Community Parks	71.6 acres
	Neighborhood/Mini-Parks	28.7 acres	Neighborhood/Mini-Parks	5% of new development area
	Trails	33.0 miles	Trails	25 miles
	Open Space	50.2 acres	Open Space	0 acres
	Cultural Resources	20,148.1 sf	Cultural Resources	Grants pending
Housing	Encourage some higher-end housing	Same policy		
Urban Form	Critical area and tree protection measures	In addition, WASA form-based plan adopted		
Historic/Archaeological Resources	No identified significant sites within UGA. Tribal review of permits	Same procedure and policy		
Public Services	LOS and resources identified. Six-year CIP presented. Concurrency based	Same -- See Chapter 9		
Public Utilities	Agencies consulted	Agencies consulted -- See Chapter 9		

The 2005 Plan and EIS is adopted by reference in this update, so that readers can delve deeper into changes in the environmental analysis.

F-2: Response to Comments -- 2015

**APPENDIX F-2:
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
RESPONSE TO COMMENTS**

(FORMERLY APPENDIX G IN 2015 PLAN)

Response to Comments -- Puget Sound Regional Council

For the final plan, we have adjusted wording in several portions based on PSRC comments. Where we wish to retain the existing language, explanations are provided.

PSRC Comment	City Response
VISION 2040 context statement:	
<p>VISION 2040 calls for local plans to include a context statement that describes how the plan addresses regional policies and provisions adopted in VISION 2040. Examples of context statements are provided in PSRC’s Plan Review Manual, page 2-1. PSRC staff is also available to provide examples adopted in local comprehensive plans.</p>	<p>The City has adopted the Vision Statement contained in its 2005 Plan. In a contextual sense, it does reflect Vision 2040, as do several of the goals and policies of Chapter 3, as well as the substantive chapters dealing with the natural environment, housing, public services and capital facilities.</p> <p>In response to your comments, we have added language to the Vision Statement that borrows from the Plan Review Manual model, to more closely tie the City’s work to VISION 2040. We further emphasize in our Implementation measures discussed throughout the Plan, that each decision made by the City that affects transit, pedestrians, urban design and other GMA-related topics will be assessed against the policies of Appendix C (See Section 1.4) and the plans adopted by reference in Section 1.5. This compulsory review is our best assurance that the numerous plans and policies are considered in the City’s decision making.</p>
2035 Land Use and Land Capacity Assumptions	
<p>The land use element documents a shortfall in land capacity within the city to accommodate allocated 2035 growth targets (9,654 housing units and 20,829</p>	<p>Your letter discusses correctly notes that local plans, including Arlington, must strive for consistency with</p>

PSRC Comment	City Response
<p>jobs within the city in 2035). Growth targets represent agreement on how growth will be accommodated within the county, and are required to be consistent with both the state population projections at the county level and with the VISION 2040 regional growth strategy at the regional geography level. Land use assumptions in comprehensive plans, as a reflection of the adopted growth target, are similarly bound by consistency requirements given their effect on the timing, location, and financing of public services, and the provision of housing and other important public facilities (e.g. transportation, wastewater). Further, the Growth Management Act explicitly requires that local comprehensive plans demonstrate sufficient capacity of developable land within existing boundaries to accommodate allocated housing and employment growth (RCW 36.70A.115). Before the plan is finalized, the city should ensure that the city's land use assumptions are consistent with the allocated growth targets, are achievable given developable land capacity, and are internally consistent throughout the plan.</p>	<p>Vision 2040 and county population and job estimates through 2035. As discussed in Chapter 4, growth targets were taken from future population forecasts and are based on the Puget Sound Regional Council "Land Use Baseline", updated as of April 2014. Employment forecasts on Table 4-5 also were based on PSRC estimates. The City and Snohomish County reached agreement on buildable land figures and population targets in 2016. These are now a part of the Plan.</p>
Airport	
<p>We commend the plan's excellent policies with respect to the airport. Prior to finalizing the plan, we suggest that you review the guidance contained in the PSRC Airport Compatible Land Use Program (http://www.psrc.org/transportation/airtrans/compatible) as a basis for any needed additions or refinements. In particular, the plan should provide direct references to the PSRC program. In addition, to make the Land Use Map more clear and representative of Plan Section 5.6 Land Use Overlays, Airport Protection District, we suggest that you more clearly label the four Airport Protection District subdistricts and five Safety Zones (A, B, C, and D).</p>	<p>Thank you for your comments. The Land Use Map will be changed after Plan adoption to reflect ASO overlays.</p>
MIC Infrastructure	
<p>The plan contains many policies that support development of a manufacturing industrial center and a compact, mixed-use, pedestrian-oriented business district, which are supportive of VISION 2040's focus on supporting a variety of central places throughout the region. VISION 2040 also recommends that local jurisdictions prioritize infrastructure funding within their identified centers. Policies that prioritize transportation, public realm, and other investments in the city's</p>	<p>Thank you for your comments. The City is working with PSRC as we move forward with formal designation of the Arlington Marysville Manufacturing Industrial Center (AMMIC) in South Arlington/North Marysville. Part of that effort will be to prioritize road, sewer, water, non-motorized trails, parks, open space</p>

PSRC Comment	City Response
centers would strengthen the plan’s support for development in these locations (MPP-DP-7, MPP-T-11-12).	and other features of our Capital Improvements Plan. The AMMIC Plan will reflect the projects outlined in Chapter 9.
Air Quality	
We are pleased that the city recognizes the importance of meeting federal and state air quality requirements. We recommend strengthening air quality policies PT-13.1 and PT-13.2 by using “will” instead of “should”.	The wording has been strengthened.
Transportation Routes	
Similarly, we encourage the strengthening of policy PT-2.1 by replacing “should” with “will”. PT-2.1: <i>A motorized and non-motorized transportation plan should be developed by the City to ensure adequate transportation routes are created concurrent with new development.</i>	<p>The City has two policies intended to ensure that transportation routing is a key part of its planning and decision making:</p> <p>PT-1.4 Design the street system to distribute traffic evenly throughout the City.</p> <p>PT-1.5 Sign and maintain Truck Route(s) and enforce their use.</p>
Land Use Assumptions in Transportation Element	
The Growth Management Act requires that travel demand forecasts and transportation need assessments be based on land use assumptions that correspond with the most recently adopted growth targets. These population and employment assumptions must be consistent throughout the comprehensive plan (i.e., land use element, transportation element, and housing element) (RCW 36.70A.070(6)(a)(i)). Please add explanatory material to more clearly document the land use assumptions in the transportation element to demonstrate consistency.	The Land Use plan was used to develop “Focus Areas”. The Focus Area population projections are included in the 2035 Transportation Plan (transportation model) and 8.1
Sidewalk and Bicycle Mapping	
In addition to the map of trails, the plan should include a map or list of sidewalks and bicycle facilities (RCW 36.70A.070(6)(a)(iii)(A)). See the Washington State Department of Commerce’s Transportation Element Guidebook, pages 122-127, for information about how to inventory existing facilities and conditions as part of the pedestrian and bicycle component	Maps 2.5 and 2.7 present good depictions of where current streets lie, where new ones are planned and where pedestrian/bicycle trails are located. Policies PL 21.1, PT 4.10, PT 5.2, PT 8.1 and others encourage or require that bicycle lanes be

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	provided with new road construction. Additional mapping to show where bicycle lanes do not exist could be confusing and would not add to the City's commitment to provide them where warranted.
Freight routes	
Freight routes are an important part of the transportation system, particularly for cities with manufacturing industrial centers, and should be inventoried and planned for in comprehensive plan transportation elements. If you do not already have designated freight routes, see the Washington State Department of Commerce's Transportation Element Guidebook, pages 85-88, for how to consider freight in your plan	See "Transportation Routes" discussion above. The City has a Freight Mobility section its Transportation Plan and is currently working with WSDOT to update the State Freight Mobility Plan.
Non-Motorized LOS	
The transportation and other plan elements have many policies supportive of walking, biking and transit. Implementation of these policies would be strengthened through adoption of levels of service and a concurrency approach that includes multiple modes. The Growth Management Act requires level of service standards for all locally owned arterials and transit routes, and the MPPs call for other modes, such as biking and walking, to be addressed through this approach. This will help with the evaluation of needs when comparing the inventories to the level of service standards, as well as multimodal concurrency requirements. The Washington State Department of Commerce's Transportation Element Guidebook has information on how to set level of service standards and identify system needs (pages 143-150 and 183-189).	The City consulted the referenced Guidebook and compared it to the Transportation Plan. Policies in the two documents are consistent. The Transportation Plan is summarized in the Comprehensive Plan and is adopted by reference thereto. Future public and private projects will be reviewed against the Plan to determine if and how various travel modes will be accommodated.
Concurrency Standards for Non-Motorized Uses	
The city is encouraged to tailor its concurrency program to multimodal travel. For instance, as the city adopts standards for its nonmotorized facilities and transit, it could incorporate these into its concurrency assessment. MPP-DP-56 calls for tailoring concurrency programs, especially for centers, to encourage development that can be supported by transit.	"Concurrency" as a requirement does not include non-motorized or multi-modal elements. However, the City will scrutinize proposed projects for the means of providing multi-modal accommodations in the design. For example, when the Manufacturing Industrial Center (MIC) is master planned, multi-modal approaches will be taken into account in laying out circulation plan. The City will also look for similar accommodations in

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	existing centers as public improvements are considered.
SR 530 and SR 531	
<p>SR 530 and SR 531 should be recognized as highways of regional significance in the plan. The plan correctly lists the level of service for these facilities as LOS D.</p>	<p>Thank you for your comment. Improvements to SR531 are currently a part of the transportation revenue package pending in Olympia. Recommendations regarding both highways are included in the “Stillaguamish Valley Economic Recovery Plan”, currently being developed under and EDA Grant, in response to the Oso disaster. These roads are given the greatest priority and attention by the City and others with interest in the North Puget Sound Manufacturing Corridor (Economic Alliance of Snohomish County).</p>
Capital Financing Plan	
<p>The transportation element should include a financing plan and analysis of funding capability that addresses transportation facilities and strategy needs identified in the plan. This financing plan should include cost estimates for identified facilities and strategies as well as estimated sources of revenue. The Washington State Department of Commerce’s Transportation Element Guidebook has information on developing a financing plan for the transportation element (pages 202-213).</p>	<p>Discussion has been added to Chapter 9. Additional detail is available in the road, water and sewer capital facilities plans, currently in the City’s adoption process and adopted by reference as part of this Comprehensive Plan.</p>
Housing Need	
<p>The housing element, particularly Figure 6-3, provides valuable context for countywide housing need and expected local action relative to affordable housing goals set by Snohomish County. The housing element should also provide a more locally-based housing needs assessment that quantifies the unmet existing and future housing need that is to be addressed in the plan. For assistance calculating this need, please refer to the Snohomish County Housing Characteristics and Needs report, the PSRC Housing Element Guide, or contact Giulia Pasciuto at gpasciuto@psrc.org. In addition, please reference the land use capacity analysis in the housing element.</p>	<p>Chapter 6 (Housing) uses information taken from the Snohomish County Housing Needs (“HO-5”) report, which in turn is based on the Vision 2040 analysis. The Chapter is also consistent with the County’s recently finalized Environmental Impact Statement on its comprehensive plan update, particularly with regard to housing needs resulting from the Brekhus/Beach and King-Thompson TDR issues.</p>

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Housing Timeline	
<p>The policies in the draft housing element go a long way to advancing VISION 2040's housing goals. Many of the policies appear to rely on future work for successful implementation. The city should consider adding a discussion of strategies and timelines for implementation of the policies in the housing element.</p>	<p>Upon adoption of the Plan, the City will undertake various code or program initiatives based on priorities agreed to by the Mayor, Council, Planning Commission and community stakeholders. Some of these will likely affect housing (cottage housing ordinance, form-based infill, mobile home/RV parks, transit oriented development, etc). These priorities will be assessed each year as part of the budget process.</p>
Sewer Service	
<p>We commend the city for prioritizing sanitary sewer service for development within the city. Please consider formalizing this priority by adding a policy on connection to the sewer system to address MPP-PS-9: <i>Serve new development within the urban growth area with sanitary sewer systems or fit it with dry sewers in anticipation of connection to the sewer system. Alternative technology to sewers should only be considered when it can be shown to produce treatment at standards that are equal to or better than the sewer system and where a long-term maintenance plan is in place.</i></p>	<p>The City does require connection to the sanitary sewer system as part of new development. It also requires connection once sewer systems are available to areas currently served by septic systems (AMC 13.08.130).</p>
Policy MPP-PS 8 Water Conservation	
<p>The city has water conservation policies that help address multicounty planning policies on long-term water needs. These policies should be expanded to include promoting the use of water reclamation and reuse, as called for by MPP-PS-8.</p>	<p>Wording has been added to policy PS 7.2 to include "water reclamation and reuse".</p>
Greenhouse Gas Emissions; Climate Change.	
<p>The multicounty planning policies in VISION 2040 and the strategies in Transportation 2040 call for reducing greenhouse gas emissions and adapting to impacts related to climate change. See page 42 of VISION 2040 for an overview of climate change and related policies and page 34 in Transportation 2040 for information on the four-part greenhouse gas reduction strategy (land use, user fees, choices, and technology). The plan already includes some policies that support positive actions to reduce greenhouse gases, such as promoting transit and increasing nonmotorized transportation options. However, the</p>	<p>The City embraces the Multi-County Planning Policies, adopts them by reference and calls for them to be consulted as part of project, plan, policy and SEPA reviews.</p>

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<p>plan could be strengthened by directly addressing the climate change-related multicounty planning policies and including additional strategies such as emissions reductions from municipal operations and additional transportation demand management strategies.</p>	

Appendix F - 3: Supplemental EIS

**Addendum
June 2017**

CITY OF ARLINGTON URBAN AREA COMPREHENSIVE PLAN
2017 ADDENDUM TO
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (SEIS)
ADOPTED JUNE 30, 2015

An Addendum provides additional information or analysis that does not substantially change the analysis of significant impacts and alternatives in the existing environmental document. It is allowed under WAC 197-11-625.

Because it is an integrated SEPA/GMA document, the 2017 Plan update contains changes outlined in Appendix G, which contains comments from the Puget Sound Regional Council as part of its Certification Review.