



DAVID EVANS  
AND ASSOCIATES INC.

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## Memorandum

**DATE:** May 18, 2016

**TO:** Ngan Ha Yang  
Project Manager, City of Lynnwood

Julie Highton  
Senior Planner, Snohomish County

**FROM:** Katie Carroz  
Senior Environmental Planner

**SUBJECT:** SEPA Compliance

**PROJECT:** 36th/35th Avenue West Improvements

**PROJECT NO.:** LYNN00000016

**COPIES:** File

The City of Lynnwood and Snohomish County propose adopting the completed National Environmental Policy Act (NEPA) Categorical Exclusion Documentation Form (CED) and related background studies to comply with the State Environmental Policy Act (SEPA), for the 36th/35th Avenue W Improvement Project (project). The project will complete two miles of roadway improvements along 36th/35th Avenue W from Maple Road to SR 99, and will add a two-way left turn lane; a traffic signal; a roundabout; and continuous curb, sidewalks, and bicycle facilities on both sides of the road for the length of the corridor.

The purpose of this memorandum is to address the SEPA environmental elements not addressed during the NEPA process. For those elements addressed during the NEPA process, the memorandum refers to the specific portion of the NEPA documentation where the element is addressed. Washington Administrative Code (WAC) 197-11-444 sets forth SEPA environmental elements.

### SEPA Part B., ENVIRONMENTAL ELEMENTS

#### 1. Earth

SEPA topics related to earth are steep slopes, unstable soils, and soil erosion, which are discussed on pages 8, 9, 20, 22, 29, 31, 39, and 42 of **Enclosure A Critical Areas Report**. Geology, soils, topography, unique physical features, and erosion are addressed in general in **Enclosure A Critical Areas Report**.

#### 2. Air

SEPA topics related to air include off-site sources of emissions and project-related emissions during construction and operation. These topics are addressed on page i and pages 11 through 19 of the Attachment I to the CED (Air Quality Technical Report). In addition to Attachment I to the CED (Air Quality Technical Report), air quality is also addressed in Part 4, Section 1 of the NEPA CED. Climate is



addressed in Attachment I to the CED (Air Quality Technical Report). No change in off-site sources of emissions or odor would occur. Existing sources of odor include traffic emissions from road traffic.

### **3. Water**

SEPA topics related to water include work within surface waters and the 100-year floodplain, groundwater withdrawals and discharges, and water runoff. Surface water movement, quantity, and quality and the 100-year floodplain are addressed in the NEPA CED Part 4, Sections 2, 4 and 9. Groundwater is addressed on pages ES-1 5, 6, and 9, and in Table 1 in the Hazardous Materials Report, Attachment D to the NEPA CED. Water runoff and absorption are addressed in the CED Part 4, Section 11.

### **4. Plants**

SEPA topics related to plants include types of vegetation, proposed removal of vegetation, threatened and endangered species, weeds, and invasive species. These topics are addressed in the NEPA CED Part 5; the Conceptual Mitigation Plan (Attachment B to the NEPA CED); and pages 16 through 19, page 37, and pages 43 through 50 of Enclosure A Critical Areas Report.

### **5. Animals**

SEPA topics related to animals (types of birds and animals, threatened and endangered species, migration routes, and measures to enhance or preserve wildlife) are addressed in the NEPA CED Part 4, Section 2 and Part 5; the Conceptual Mitigation Plan (Attachment B to the NEPA CED); and the ESA No Effect Determination (Attachment H to the NEPA CED). Habitat for and numbers or diversity of species of fish or other wildlife are addressed in the NEPA CED Part 4, Section 2; and Part 5. Threatened and endangered species are addressed in the NEPA CED Part 4, Section 2; and Part 5. No known fish or wildlife migration routes are located along the project corridor.

### **6. Energy and Natural Resources**

SEPA topics related to energy and natural resources include the project's energy needs and conservation features and solar energy use by adjacent properties. Businesses and residences within the project area will continue to use energy for light and heating after the project is built. Puget Sound Energy (PSE) and Snohomish County Public Utilities District (PUD) provide natural gas and electricity service, respectively, to the area and employ conservation techniques and encourage customers to use energy efficiently. The use of non-renewable resources, such as natural gas, gasoline, and oil, with the project would be similar to non-renewable resource use under existing conditions. Construction would require gasoline and oil. The project would not result in a substantial increase in demand for energy or natural resources. The project would not affect neighboring properties use of solar energy.

### **7. Environmental Health**

SEPA topics related to environmental health include environmental health hazards and noise. Potential releases to the environment affecting public health, such as toxic or hazardous materials, are addressed in NEPA CED Part 4, Section 5; and on pages 6 through 9 of the Hazardous Materials Technical Report (Attachment D to the NEPA CED). The risk of explosion would not change with the project in the long term. Risk of explosion during the temporary construction period would be slightly higher due to the on-site presence of additional equipment and vehicles holding and using gasoline. Noise is addressed in the



NEPA CED Part 4, Section 6; and in the Traffic Noise Technical Report (Attachment E to the NEPA CED).

## **8. Land and Shoreline Use**

SEPA topics related to land and shoreline use include current uses; farmlands; zoning, comprehensive plan and shoreline designations; critical areas; displacement; and compatibility with plans and policies. Current uses in the project area include single family residential, multi-family residential, commercial uses, an Alderwood Water & Wastewater District water tower, and Spruce Park. No farmlands are located in the project area, as addressed in the NEPA CED Part 4, Section 8. No shorelines exist in the project area. Critical areas within the project area are discussed in **Enclosure A Critical Areas Report**.

Development in the project area is guided by the Snohomish County Comprehensive Plan and the City of Lynnwood Comprehensive Plan. The City of Lynnwood Comprehensive Plan designates the project area as High-density and Medium-density Multi-family Residential; Mixed-use Urban Center; Regional Commercial; Public Facilities; Low-density Single Family Residential; Parks; Open Space; and Recreation; and Local Commercial. The Lynnwood portion of the project is primarily zoned RS-8 - Residential (8,400 square foot lots) with interspersed areas zoned P-1 – Public.

The Snohomish County Comprehensive Plan designates the project area as Urban Center, Urban Commercial, Urban High Density Residential, and Public/Institutional. Zoning in the Snohomish County portion includes Planned Residential Development, Community Business, General Commercial, Urban Center, Residential (8,400 square foot lots), Forestry and Recreation, Multi-family Residential, Low-density Multi-family residential, and Neighborhood Business. The project would result in no displacement or relocations.

## **9. Housing**

SEPA topics related to housing include the addition or elimination of housing. The project would not add or eliminate any housing stock, nor would any homes experience any long-term adverse impacts with the project.

## **10. Light and Glare**

SEPA topics related to light and glare include project-producing light and glare, safety hazards and view interference related to glare, and off-site glare sources potentially affecting the project. Light and glare will change with the project to the extent that additional lighting is provided along 36th/35th Avenue W. Safety features are included in the project, and glare would not detract from existing views. Off-site sources of light include existing street lighting and lighting associated with commercial uses – these will not adversely affect the project. See the Right-of-Way Memorandum (CED Attachment A) and Environmental Justice Memorandum (CED Attachment G) for further information.

## **11. Recreation**

SEPA topics related to recreation include displacement of recreational properties in the project area. Recreation in the project area includes Spruce Park, uses at which will not be displaced due to the project. A small portion of Spruce Park adjacent to 36<sup>th</sup> Avenue W will be converted to sidewalk. Recreation is addressed in the NEPA CED Part 4, Section 7; and in the Exemption of Section 4(f) Requirement Memorandum (Attachment F to the NEPA CED).



## **12. Historic and cultural preservation**

SEPA topics related to historic and cultural preservation include on-site structures over 45 years old or listed in preservation registers, evidence of historic occupation, and methods used to assess impacts on cultural and historic resources. The Washington Department of Archaeology and Historic Preservation (DAHP) has concurred that this project will not result in effects on historic properties. Further detail is provided in the NEPA CED Part 4, Sections 3 and 10; in the DAHP Letter of Concurrence (Attachment C to the NEPA CED); and in **Enclosure B**, Lake Stickney Work Memorandum.

## **13. Transportation**

SEPA topics related to transportation include public streets and highways; transit; parking spaces; water, rail, or air transportation; trips per day; and movement of agricultural goods. With the project, level of services (LOS) would improve at two major intersections on 36th Avenue W. PM peak hour traffic volumes are not expected to increase as a result of the project. The project would not result in major changes to traffic circulation.

Community Transit routes 112 and 113 and the Swamp Creek Park & Ride will continue to serve the project area. The project would not affect parking along the city segment. Along the county segment, the project would result in a decrease of 18 on-street parking spaces. This project would not affect or be affected by any waterborne, rail, or air traffic. Movement of agricultural goods would not be affected. Additional detail is provided in **Enclosure C1** City of Lynnwood Traffic Report and **Enclosure C2** Snohomish County Traffic Report.

## **14. Public Services**

SEPA topics related to public services include the increased need for public services with the project. The City of Lynnwood Fire Department and Snohomish County Fire District No. 1 will continue to provide fire protection services to the project area. Similarly, the Lynnwood Police Department and Snohomish County Sheriff's Office will continue to provide law enforcement services to the project area. Project area residents are served by the Edmonds School District (ESD). A small portion of the project alignment near SR 99 is within Mukilteo School District boundaries. The demand for public services would not change as a result of this project.

## **15. Utilities**

SEPA topics related to utilities include existing utilities and utilities proposed with the project. Snohomish County and the City of Lynnwood's public works departments would continue to maintain their respective segments of the road. Several companies would continue to provide telecommunication services within the project area, including AT&T, Comcast, DirecTV, Dish Network, and Frontier FiOS. Most major wireless service carriers are available within Lynnwood and are governed by the Washington Utilities and Transportation Commission. Alderwood Water and Wastewater District would continue to provide water and wastewater services to the project area. Waste Management NW and Republic Services would continue to provide garbage and recycling services to the project area.

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Enclosures:    **A. Critical Areas Report**  
                  **B. Lake Stickney Work Memorandum**  
                  **C1. City of Lynnwood Traffic Report**  
                  **C2. Snohomish County Traffic Report**

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