

# AGENDA

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## BOTHELL PLANNING COMMISSION

\*\*\*VIRTUAL MEETING\*\*\*

Bothell City Hall, 18415 101st Avenue NE  
October 7, 2020, 6:00 PM

Pursuant to Governor Inslee's continued Stay Home Stay Healthy Proclamation 20-25 and the possible extension of Proclamation 20-28 regarding open public meetings, and in an effort to curtail the spread of the COVID-19 virus, this Planning Commission meeting will be conducted remotely unless otherwise directed by the Governor's proclamation. We encourage members of the public to attend and participate in the meeting remotely, as described in more detail below.

To attend the meeting:

- Watch the meeting [LIVE online](#) on the City of Bothell YouTube Channel
- Watch the meeting live on BCTV Cable Access Channels 21/26 (must have Frontier/Comcast Cable)
- Listen to the meeting live by phone: +1-510-338-9438 USA Toll - Access code: **126 756 7891**
- **If you plan on attending the meeting remotely and want to provide public comments/testimony or would like to submit written comments please email Michael Kattermann at [Michael.kattermann@bothellwa.gov](mailto:Michael.kattermann@bothellwa.gov) by 3:00 PM. (day of the meeting)**

Planning Commission meetings are also recorded and available the next day on the [City of Bothell YouTube Channel](#).

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### 1. CALL TO ORDER

### 2. PUBLIC COMMENTS

If you wish to comment (either in writing or orally) please submit your comments or request to [michael.kattermann@bothellwa.gov](mailto:michael.kattermann@bothellwa.gov) prior to 3PM (day of meeting). Persons making oral comments will be allowed 3 minutes to speak. All comments will be made part of the record.

### 3. APPROVAL OF MINUTES

September 16, 2020

### 4. NEW BUSINESS

### 5. PUBLIC HEARING

Canyon Park Subarea Plan Update cont'd

### 6. STUDY SESSION

Canyon Park Subarea Plan Update

### 7. OLD BUSINESS

### 8. REPORTS FROM STAFF

### 9. REPORTS FROM MEMBERS

### 10. ADJOURNMENT

## Projected Schedule of Land Use Items

**City Council (CC)** meetings, shown in **bold**, start at 6 p.m. unless otherwise noted.  
*Planning Commission (PC)* meetings, shown in *italics*, start at 6 p.m. unless otherwise noted.  
 Other Board meetings shown in normal text, start at 6 p.m. unless otherwise noted.  
 Meetings are held in the **City Hall building at 18415 101<sup>st</sup> Avenue NE** unless otherwise noted.  
For planning purposes only: schedule subject to change without notice

### October 2020

| Monday    | Tuesday   | Wednesday   | Thursday  | Friday    |
|-----------|---|---|-----------|-----------|
|           |   |   | <b>1</b>  | <b>2</b>  |
| <b>5</b>  | <b>6</b>  | <b>7</b><br><br><i>Canyon Park<br/>Subarea Plan Update<br/>cont'd Public Hearing</i>  | <b>8</b>  | <b>9</b>  |
| <b>12</b> | <b>13</b>                                       | <b>14</b>   | <b>15</b> | <b>16</b> |
| <b>19</b> | <b>20</b>                                       | <b>21</b><br><br><i>Draft Bike Plan<br/>briefing</i><br><br><i>Canyon Park<br/>Subarea Plan Update<br/>potential<br/>recommendation</i> | <b>22</b> | <b>23</b> |
| <b>26</b> | <b>27</b><br><br>Landmark<br>Preservation Board | <b>28</b>   | <b>29</b> | <b>30</b> |

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# September 16, 2020 Minutes

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**BOTHELL PLANNING COMMISSION**

**REGULAR MEETING** – September 16, 2020

**COMMISSIONERS PRESENT:** Kevin Kiernan

**COMMISSIONERS PRESENT (via WebEx):** Jenne Alderks, Carston Curd, Amanda Dodd Olson, Sarah Gustafson, Brad Peistrup, David Vliet

**COMMISSIONER ABSENT AND EXCUSED:** None

**STAFF PRESENT:** Community Development Director Michael Kattermann

**STAFF PRESENT (via WebEx):** Capital Division Manager Steve Morikawa

**CALL TO ORDER:** The Regular Meeting of the Bothell Planning Commission was called to order by Chair Kevin Kiernan on September 16, 2020, at 6:00 p.m. in the Council Chambers at the Bothell Town Hall, 18415 101<sup>st</sup> Avenue NE.

**PUBLIC COMMENTS:** (see video for detailed comments)

- Kim Foley - Member of the Bothell Arts Commission

**APPROVAL OF MINUTES:**

|  |
|--|
| <b>CURD MOVED TO APPROVE THE MINUTES FOR SEPTEMBER 2, 2020. VLIET SECONDED. MOTION PASSED WITH ALL PRESENT IN FAVOR.</b> |
|--|

**NEW BUSINESS:** None

**PUBLIC HEARING:**

Chair Kiernan opened the continued Public Hearing on the Canyon Park Subarea Plan Update.

Public Testimony: (see video for detailed testimony)

- Roger Belanich - Developer of Canyon Park Business Center - concerns regarding traffic congestion around the Canyon Park Business Subarea and the 405 offramp. Storm water has not been addressed in the subarea plan.
- Ann Aagaard - Bothell, WA – Sept 10 Comment Letter – Wetlands Mitigation concerns.
- Travis Lynn – Capital Projects Manager with GenoTherapeutics – regulation changes for current projects that are underway.
- Donald Jones – CKC Laboratories – Concerns regarding traffic impacts.
- Ian Morrison – Attorney - regulation changes for current projects that are underway.

Director Kattermann introduced Bob Bengford and Rachel Miller with MAKERS Architecture who shared a presentation on the Canyon Park Subarea Plan.

Discussion ensued

Director Kattermann asked that the Canyon Park Subarea Plan update hearing be continued to October 7, 2020.

**CURD MOVED TO CONTINUE THE CANYON PARK SUBAREA PLAN UPDATE HEARING UNTIL OCTOBER 7, 2020. OLSON SECONDED AND IT PASSED WITH ALL PRESENT IN FAVOR.**

**STUDY SESSION:** None

**OLD BUSINESS:** None

**REPORTS FROM STAFF:**

- Director Kattermann shared that approval has been given to fill Bruce Blackburn's position.
- Commissioner Curd spoke at the September 8 Council meeting summarizing the Commission's deliberation and recommendation on the ordinance regarding parking reductions. Council approved this ordinance, with the one staff modification to limit the reduction for market rate housing to ¼ mile pending further analysis.

**REPORTS FROM MEMBERS:**

- Commissioner Curd reminded the public that they should go to the city's website and attend and provide comments at the virtual open house for the Storm and Service Water Master Plan Update.

**ADJOURNMENT:**

**OLSON MOVED TO ADJOURN THE SEPTEMBER 16, 2020 PLANNING COMMISSION MEETING. ALDERKS SECONDED. MOTION PASSED WITH ALL PRESENT IN FAVOR.**

The meeting was adjourned at 8:58 P.M.

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# **Canyon Park Subarea Plan Update cont'd Public Hearing**

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# MEMORANDUM

## Community Development



City of Bothell

DATE: October 7, 2020

TO: Planning Commission

FROM: Michael Kattermann, Community Development Director

SUBJECT: Canyon Park Subarea Plan Update, Development Regulations - Continued Public Hearing on Draft Documents

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### Objectives

- Continue to receive public testimony and close the public hearing at the end of testimony;
- Receive a briefing and provide feedback on the draft implementation chapter (Attachment 1);
- Review responses to written comments and provide direction to staff on additional information or clarifications (Attachment 2); and
- Provide direction to staff on specific recommendations to City Council.

No action is required at this time.

### Discussion

Over the past several months the Commission has received briefings from the project team, received oral and written public testimony and provided feedback and direction on the draft subarea plan, development regulations and planned action ordinance. The project team is working diligently to wrap up the final drafts to the documents for the Commission to be able to prepare a recommendation to City Council. The feedback and direction provided by the Commission based on the information in this packet represents a significant step in preparing the final draft.

### Implementation Chapter

Chapter 10, Implementation, is the last major piece for review. Most of the actions have already been reviewed in the draft plan. Please note the “Action numbering” key on the page preceding the action table – the numbering system is different from the July 8<sup>th</sup> document. There also have been some modifications to the actions from the July 8<sup>th</sup> draft plan to clarify the language and to reflect direction from the Commission. Brand new actions are highlighted.

Staff is requesting review and feedback on the three left columns of the table, specifically:

1. Action – a concise description of actions needed to implement the plan, organized by type (e.g. Council Actions, Capital Investments) under each plan chapter.

- a. Is the description of the action clear?
  - b. Does it reflect previous direction from the Commission?
2. Timing – an estimate of when the action could begin within the planning horizon. Actual timing will depend on multiple factors (e.g. funding, staffing, relative sequencing, project complexity, competing priorities) and will change over the life of the plan.
  - a. Questions about the assigned time periods?
  - b. Suggested changes to timing?
3. Priority – a ranking of the proposed order in which actions will be undertaken. As with timing, the assignment is based on a number of factors (e.g. importance, relative sequencing, availability of resources). These will also change over the life of the plan as actions are completed, new actions are identified, and priorities shift.
  - a. Questions about assigned priority for specific actions?
  - b. Suggested changes to priorities?

If the Commission has suggested changes to the timing or priorities, staff may need to provide additional information about why a particular timing or priority was assigned. The remaining columns provide generalized information to identify primary and secondary responsibility for actions, broad categories of estimated city costs (i.e. does not reflect private or other public agency costs), potential funding sources, and related actions that are considered key to implementation. Staff is still reviewing the information in the remaining columns and refining as necessary. For example, responsibilities assigned in column 4 are preliminary. The intent is to identify specific city departments, outside agencies, private sector parties and others that would have lead responsibility or a substantive role in carrying out the actions. The information regarding cost categories, potential funding sources and related actions are relatively complete.

### Response to Comments

Attachment 2 contains the substantive comments from letters received since the Commission began considering which land use alternative to recommend as preferred. Although comments on the draft plan do not require a response, it is important for the Commission to have the information available in developing the recommendation. The attached table provides a response to questions and comments (highlighted in yellow) related to issues for Commission consideration. Most of the questions and issues have been addressed in the various draft documents to date (i.e. draft EIS and addendum, subarea plan, development regulations and planned action ordinance). In some instances the staff has suggested and/or the Commission has directed changes to the draft plan or regulations to directly address an issue. There are issues that cannot be resolved as requested due to other considerations.

Staff is seeking feedback or direction on the following list of questions and/or staff recommendations on outstanding issues from the comments. These are noted in Attachment 2 (highlighted in green) and briefly described below.

Comment 1a

A request to retain the 100-foot building height currently allowed in the R-AC zone for non-residential uses. Staff recommends retaining current proposed heights at this time and is requesting this item be deferred to the October 21 Commission meeting when it can be discussed in the context of other code changes.

Comment 4

A request to delete the section on buffer enhancement (page 60 of the draft plan) and the related action. Staff recommends that the narrative be retained and that the proposed action be revised to "Evaluate the potential for applying different buffer requirements for the subarea in conjunction with the CAO update." Staff and the consultant team need additional information from the critical areas analysis currently underway in order to evaluate the buffer enhancement proposal in the draft plan. The work currently underway will provide for a better informed discussion at that time.

Comment 17b

A request to vest projects that have progressed to a certain level of planning and design in the existing code for a period of time prior to formal application. This was done for adoption of the Downtown Plan. Staff recommends evaluating the implications of including a vesting provision in the development regulations and Planned Action Ordinance with very limited application.

Comment 17c

Related to comment 17b is a request for an exemption from the minimum floor area ratio (FAR) requirements. An exemption for building additions was included in the minimum density/FAR amendments proposed last year. Staff is recommending an evaluation of the potential extension of the exemption for new buildings on a developed site provided the overall FAR of the site is increased. This would not apply to redevelopment of an entire site.

Comment 18b

A request to include a placeholder in the draft code for a transfer of development rights (TDR) condition that could be used to allow essential public facilities to develop below the minimum FAR requirements. Staff recommends that development regulations provide a placeholder for creation of a TDR program that can be applied to essential public facilities.

Comment 18d

A request to provide flexibility is the amount and method of providing public open space for essential public facilities. Staff recommends additional discussion with Sound Transit to explore the potential for alternative means to achieve the desired outcomes.

Comment 18e

A request to allow for modification of the 20<sup>th</sup> Avenue street cross-section as shown in the draft plan. The current cross-section requires a 40' landscape buffer/swale on the east side of the

roadway. Staff recommends additional discussion with Sound Transit to explore the potential for alternative means to achieve the desired outcomes.

### **Next Steps**

In order to conclude the Commission's deliberations and prepare a recommendation to Council for action before the end of this year, the staff is proposing the following schedule.

#### October

- 10/7 Commission: close public hearing; review responses to written public comments; review and comment on draft implementation chapter; provide additional direction to staff
- 10/21 Commission: provide final direction to staff for recommendation to Council on subarea plan, development regulations and planned action ordinance

#### November

- 11/4 Commission: Commission review of draft documents and possible recommendation on subarea plan, development regulations and planned action ordinance (dependent upon ability of project team to prepare final drafts for Commission action)
- 11/17 Council (tentative): Study session on proposed subarea plan, development regulations and planned action ordinance
- 11/18 Commission: Back-up date for Commission recommendation

#### December

- 12/15 Council (tentative): Public hearing and action

**Action:** No action is required at this time.

#### **Attachments:**

- 1 – Draft Implementation Chapter
- 2 – Response to public comment letters

*Attachment 1 - Draft Implementation Chapter*



## Plan Implementation

This chapter details the priority, timing, responsible parties, and available resources to complete the actions described in the Land Use, Urban Design & Community Livability, Economic Development, Natural Environment, and Transportation elements. The narrative below highlights the key actions and relationships between them that affect their phasing.

The chart starting on page 136 indicates anticipated timing and priority for individual actions. Though all actions included in this subarea plan are important, some need to happen before others. This is particularly true for transportation actions.

# 10. Implementation

## Transportation Projects

The Transportation Approach (page 101) summarizes the major capital improvements and studies that need to occur for Canyon Park to function and grow as planned. The following is a rough guide, but timing will depend on the speed of growth and funding availability. Transportation projects generally fall into the following three categories.

**Capacity projects.** These capital improvements (e.g., street and intersections improvements) directly affect Bothell's corridor level of service (LOS). They become necessary when growth generates enough trips that Bothell's LOS standards would no longer be met. Bothell will aim to complete these projects before an increase in trips triggers a hold on development. These projects are eligible for Transportation Impact Fee (TIF) funding. Projects that are anticipated to be worked on within a 6-year period are included in the 6-Year Transportation Improvement Plan. The capacity projects affecting LOS in likely chronological order include:

1. Improve turn lanes along 228th St SE at 29th Dr SE, 31st Ave SE, and Fitzgerald Road,
2. Complete SR 527's seven-lane configuration,
3. Improve 220th St SE/17th Ave SE intersection,
4. Extend 20th Ave SE to Maltby Rd,
5. Improve ped/bike facilities on 9th Ave SE, and
6. Extend 214th St SE to 9th Ave SE.

**Non-capacity public projects.** These projects are important for transportation functionality and shifting SOV trips to other modes, but they are not expected to directly impact level of service, so they are not impact fee eligible. These projects include the ped/bike projects noted on Map 14 and 15. These would be implemented primarily through non-TIF City funds, grants, and frontage improvements during redevelopment.

**Non-capacity private streets.** These projects include private streets that may become public and future through-block connections. Development would be conditioned on providing a certificate or letter of adequacy from the Canyon Park Business Center Owners Association to show that private streets would meet standards for public streets. As soon as the subarea reaches the No Action level of growth (see Canyon Park EIS) or the streets become public, they must meet City standards for any further development using these streets to be allowed. Improvements would be privately funded except where the City has a memorandum of agreement. Major projects include intersections within the Canyon Park Business Center.

## Phasing

### Short Term (2020-2025)

Bothell will likely be focused on COVID-19 pandemic recovery during the initial years. This means that implementation of this plan may have a slow start. However, this is a 20+ year plan and events and trends historically even out over time and can even exceed planned growth as evidenced since the Great Recession. In the long term, the transit orientation and creation of compact and complete communities remains the goal. This means getting started in the near term with a careful eye towards vulnerable communities especially impacted by COVID, such as those needing affordable homes and commercial space.

For the plan to be realized, public and private investment will be required. For Bothell, this includes dedicating staff resources and securing additional funding sources for capital investments. Bothell's first steps include:

- Adopt the Canyon Park development regulations. The regulations will allow and encourage this plan's envisioned development and prevent development that does not support the vision and growth targets. It also

ensures that back-of-curb pedestrian and bicycle facilities shown on Map 14 (page 105) are implemented with development.

- Adopt the Planned Action Ordinance. The Planned Action Ordinance allows development to move through permitting more easily with the environmental impact analysis already completed for projects that are consistent with the plan. It also outlines the requirements to mitigate impacts and meet concurrency requirements.
- Analyze the equity impacts of this plan's rezone actions and planned investment in transit station areas and identify achievable ways to support small businesses and cultural anchors as the area grows and changes.
- Actively seek transit-oriented development partners to achieve desired development (e.g., public-private partnerships to implement significant public gathering places, excellent transit access, and affordable housing).

Likely first transportation steps include:

- Apply street design standards as outlined in the development regulations.
- Identify and obtain funding to initiate a TDM program. This requires the support and partnership of transit agencies, property owners, residents, and business owners.
- WSDOT completes the I-405 Express Toll Lane (ETL) project from south of SR 522 to SR 527 including direct access to 17th Ave SE.
- Provide additional turn lanes at three intersections along 228th St SE at Fitzgerald Rd, 29th Dr SE, and 31st Ave SE.
- Continue to complete the North Creek Trail - Section 4.
- Identify funding and begin analysis and coordination of SR 527/Bothell-Everett Highway/Bothell Way NE corridor; 228th St SE/Bothell-Everett Hwy intersection, and regional transit improvements.

- Seek funding for the critical pedestrian and bicycle projects shown on Map 15 (page 106). This will be opportunistic and will carry into later phases. Begin construction where possible.

## Mid Term (2026-2035)

During the mid term, major actions include:

- Carefully orchestrate transit-oriented development, likely through public-private partnerships, that includes significant public gathering spaces and safe and comfortable paths to transit.
- Complete North Creek Trail gap and crossing along 220th St SE.
- Complete SR 527 widening including associated intersection improvements.
- Seek and allocate funding for 228th St SE pedestrian improvements under the I-405 overpass.
- Continue requiring pedestrian/bicycle improvements (or fee-in-lieu), and seeking funding as possible, to implement projects shown on Map 14 (page 105).
- Continue TDM efforts.
- Seek funding for the 20<sup>th</sup> Ave SE extension and 9<sup>th</sup> Ave SE design and construction, as this must occur before any 214<sup>th</sup> St SE extension. The street extensions are critical for supporting the subarea's growth. Identify, plan for, and allocate funding to the wetland/stream mitigation projects associated with the street extensions.

## Long Term (2036-2044)

Major long-term actions include:

- Continue facilitating desired transit-oriented development.
- Complete 220th St SE/17th Ave SE intersection improvements early in this period.
- Complete the 20th Ave SE extension.

- Complete improvements to 9th Ave SE including ped/bike facilities and adding a second left turn lane onto SR 527. This must be complete prior to any 214th St SE extension.
- Complete 214th St SE extension and associated mitigation projects.
- Complete Fitzgerald Road improvements.
- Continue requiring pedestrian/bicycle improvements (or fee-in-lieu) to implement projects shown on Map 14 (page 105).
- Continue TDM efforts.

## Action Chart Key

### Timing (S, M, L, O)

- S** Short term (by approximately 2025)
- M** Mid term (approximately 2026-2035)
- L** Long term (approximately 2035-2044)
- O** Opportunistic (as funding is available)

### Priority (H, M, L)

- H** High priority
- M** Medium priority
- L** Low priority

### Cost Estimate

- \$** Less than \$500,000
- \$\$** \$500,000 - \$5,000,000
- \$\$\$** \$5,000,000 - \$15,000,000
- \$\$\$\$** Greater than \$15,000,000

The major street improvements described in this plan are typically \$18 to \$25 million. Exceptions include the 219<sup>th</sup> PI SE connection (approximately \$1.27 mil), the Comprehensive Plan project to complete a 7-lane cross section on Bothell-Everett Highway (approximately \$10 mil), and intersection improvements, typically between \$1 and \$2 mil.

## Responsible Parties and Other Acronyms

- ARCH** A Regional Coalition for Housing
- BAT** Business access and transit
- CD** Community Development
- CT** Community Transit
- EASC** Economic Alliance of Snohomish County
- ED** Economic Development
- EDC** Economic Development Council of Seattle and King County
- Frontage** Street, landscape strip and sidewalk improvements required with development
- MFTE** Multifamily Tax Exemption
- NCT** North Creek Trail
- PC** Planning Commission
- ST** Sound Transit
- TSP** Transit signal priority
- TDM** Transportation demand management
- TDR** Transfer of development rights

## Action Numbering

Actions are keyed using an updated numbering system as follows (page numbers refer to July 8<sup>th</sup> draft plan):

|   |           |
|---|-----------|
| <b>05. Land Use (LU)</b> .....  | <b>45</b> |
| Land Use Designations ( <b>LU-D</b> ) .....   | 50        |
| Affordable Housing ( <b>LU-AH</b> ) .....   | 56        |
| Affordable Commercial Space ( <b>LU-AC</b> ) .....  | 57        |
| Development Feasibility/Incentives .....  | 58        |
| Parking Reductions ( <b>LU-PR</b> ).....  | 58        |
| Affordable Commercial Space Incentives ( <b>LU-AC</b> )<br><i>(final draft combines this section</i><br><i>with Affordable Commercial Space)</i> .....        | 59        |
| Buffer Enhancement ( <b>LU-BE</b> ) .....   | 60        |
| Transfer of Development Rights ( <b>TDR</b> ) .....   | 61        |
| <br>  |           |
| <b>06. Urban Design &amp; Community Livability (UD)</b> .   | <b>63</b> |
| Block Front Street Designations ( <b>UD-BF</b> )<br><i>(this section may be renamed Design Guidance)</i> .....  | 66        |
| Park-and-Ride Redevelopment and Design ( <b>UD-PR</b> )<br><i>(this section will be renamed to</i><br><i>Redevelopment, Design, and Park-and-Rides)</i> ..... | 70        |
| Gathering Spaces ( <b>UD-GS</b> ) .....   | 72        |
| <br>  |           |
| <b>07. Economic Development (ED)</b> .....  | <b>77</b> |
| Regional Growth Center ( <b>ED-RGC</b> ) .....  | 79        |
| Life Sciences Innovation Hub ( <b>ED-LS</b> ) .....   | 81        |
| Small and Entrepreneurial Business Support ( <b>ED-SB</b> ) .....   | 82        |
| <br>  |           |
| <b>08. Natural Environment (NE)</b> .....   | <b>83</b> |
| Stormwater ( <b>NE-SW</b> ) .....   | 85        |
| Wetland and Riparian Mitigation/<br>Restoration Projects ( <b>NE-WR</b> ) .....   | 91        |
| Critical Areas and Vegetation Conservation ( <b>NE-CA</b> ) .....   | 94        |
| Greenhouse Gas Emissions <i>(see T-TDM and NE-BE)</i> .....   | 97        |
| Building Efficiency ( <b>NE-BE</b> ) .....  | 97        |
| <br>  |           |
| <b>09. Transportation (T)</b> .....   | <b>99</b> |
| Pedestrian and Bicycle Infrastructure ( <b>T-PB</b> ).....  | 104       |
| Transit ( <b>T-T</b> ).....   | 109       |
| Vehicular Travel ( <b>T-V</b> ) .....   | 112       |
| Transportation Demand Management ( <b>T-TDM</b> ).....  | 112       |
| Proposed Vehicular Projects and other actions ( <b>T-V</b> ) ....   | 113       |
| Other Streets Design ( <b>T-SD</b> ) .....  | 120       |
| Project Phasing ( <b>T-PP</b> ) .....   | 129       |
| LOS Policy ( <b>T-LOS</b> ).....  | 129       |

# Actions Chart

## Land Use Actions

| Action  | Timing (S,M,L,O) | Priority (H,M,L) | Responsible Parties/ Partners (lead in bold) | Cost Estimate (\$, \$\$, \$\$\$, \$\$\$\$) | Potential Resources/ Funding | Related Actions   |
|---|------------------|------------------|--|--|------------------------------|---|
| <b>COUNCIL ACTIONS</b>  |                  |                  |  |  |                              |   |
| <b>LU-D-1 and 2.</b> Establish and apply new Canyon Park zones. Among others, topics include: <ul style="list-style-type: none"> <li>• Minimum affordable housing requirements (<b>LU-AH-1</b>)</li> <li>• Remove residential as an allowed use from employment zones (<b>LU-AC-1</b>)</li> <li>• Affordable commercial space design standards (<b>LU-AC-2</b>)</li> <li>• TDR program that encourages affordable housing/commercial (<b>LU-TDR-1, 2, and 3</b>)</li> </ul> | S                | H                | <b>CD</b> , PC, CC                           | \$   | Public                       | Coincides with design standards (UD-BF-1 and 2)   |
| <b>LU-AH-2.</b> Establish an MFTE program for Canyon Park.  | S                | H                | <b>CD</b> , PC, CC, ARCH                     | \$   | Public                       |   |
| <b>POLICY &amp; FUTURE EXPLORATION</b>  |                  |                  |  |  |                              |   |
| <b>LU-AC-3.</b> Apply an equity impact analysis to this plan's zoning actions; better inform incentives priorities.   | S                | H                | <b>CD</b> , ED                               | \$   | Public                       | Analyzes zoning (LU-D-1 and 2) and affordable commercial space (LU-AC)  |
| <b>LU-AC-4.</b> Explore nonprofit and other partnerships to expand commercial affordability options.  | M                | M                | <b>CD</b> , ED                               | \$   | Public                       | Supplements other LU-AC actions   |
| <b>LU-AC-5 and 6.</b> Explore incentives for business retention/relocation assistance and affordable commercial space.  | M                | M                | <b>CD</b> , ED                               | \$   | Public                       | Supplements other LU-AC actions; balance with affordable housing (LU-AH-1) and green building (NE-BE-1) goals |
| <b>LU-PR-2.</b> Study parking maximums feasibility.   | M                | M                | <b>CD</b> , PC                               | \$   | Public                       | Supplements TDM (T-V-1)   |
| <b>LU-BE-1.</b> Establish a buffer-enhancement and reduction protocol.  | M                | M                | <b>CD</b>                                    | \$   | Public                       | Also see NE- (wetlands-mitigation)  |

New action. LU-AC numbering updated because of new action and combined sections (p 57 and 59)

Delete; will address in citywide CAO process

## Urban Design & Community Livability Actions

| Action   | Timing (S, M, L, O) | Priority (H, M, L) | Responsible Parties/ Partners (lead in bold) | Cost Estimate (\$, \$\$, \$\$\$, \$\$\$\$) | Potential Resources/ Funding | Related Actions  |
|--|---------------------|--------------------|--|--|------------------------------|--|
| <b>COUNCIL ACTIONS</b>   |                     |                    |  |  |                              |  |
| <p><b>UD-BF-1 and 2.</b> Apply block front, building, and site design standards. Among flexible ground floors, windows, and frequent entries to create neighborhood center streets, and other topics, standards address:</p> <ul style="list-style-type: none"> <li>• Through-block connections (<b>UD-TB-1 and 2</b>)</li> <li>• Pedestrian paths to flyover transit stations (<b>UD-PR-2 and 3</b>)</li> <li>• Adaptable parking garages (<b>UD-PR-4</b>)</li> <li>• Public open space (<b>UD-GS-1, 3, and 4</b>)</li> </ul> | S                   | H                  | <b>CD, PC, CC</b>                            | \$   | Public                       | Coincides with zoning (LU-D-1 and 2) and green building (NE-BE-1); consider affordability incentives (LU-AH-1 and LU-AC-3 and 4) |
| <b>POLICY &amp; FUTURE EXPLORATION</b>   |                     |                    |  |  |                              |  |
| <b>UD-GS-2.</b> Pursue public-private partnerships to create the major parks/plazas with redevelopment.  | M                   | H                  | <b>CD</b>                                    | \$   | Public, private              | See park-and-ride redevelopment (T-T-4 and 5)  |
| <b>UD-GS-5.</b> Study opportunities for converting a private eastern subarea property to a public park in the next PROS Plan update.   | L                   | M                  | <b>P&amp;R, CD, PW</b>                       | \$   | Public, private              |  |

## Economic Development Actions

| Action  | Timing (S, M, L, O) | Priority (H, M, L) | Responsible Parties/ Partners (lead in bold)                                    | Cost Estimate (\$, \$\$, \$\$\$, \$\$\$\$) | Potential Resources/ Funding            | Related Actions  |
|---|---------------------|--------------------|---|--|---|--|
| <b>COUNCIL ACTIONS</b>  |                     |                    |   |  |   |  |
| <b>ED-RGC-1, ED-SB-2, ED-LS-4, and ED-LS-5.</b> Adopt development regulations and design standards to support the RGC and business (innovation hubs and affordable commercial space). | S                   | H                  | <b>CD</b> , PC, CC  | \$   | Public                                  | Coincides with zoning (LU-D-1 and 2) and design standards (UD-BF-1 and 2)    |
| <b>POLICY &amp; FUTURE EXPLORATION</b>  |                     |                    |   |  |   |  |
| <b>ED-SB-1.</b> Further support small and entrepreneurial businesses.   | S-L                 | H                  | <b>ED</b> , CD  | \$\$-\$                                    | Public, grant                           | See the affordable commercial space actions (LU-AC) in the Land Use section. |
| <del><b>ED-RGC-4.</b> Apply consistent and efficient City licensing and permitting practices and procedures.</del>  | <del>S-L</del>      | <del>H</del>       | <del>CD, PW</del>   | <del>\$</del>                              | <del>Public</del>                       |  |
| <del><b>ED-LS-1.</b> Continue to participate and support the Biomedical Device Innovation Zone.</del>   | <del>S-L</del>      | <del>H</del>       | <del>ED, CD</del>   | <del>\$</del>                              | <del>Public</del>                       | <del>Other Life Sciences-Innovation Hub (ED-LS) actions</del>                |
| <b>COORDINATION WITH OTHER AGENCIES</b>   |                     |                    |   |  |   |  |
| <b>ED-RGC-2.</b> Determine how the City might assist with economic development efforts.   | O                   | H                  | <b>ED</b> , Life Science Washington, local businesses, educational institutions | \$   | Public                                  |  |
| <b>ED-RGC-3.</b> Participate in regional efforts to retain and attract business and industry.   | O                   | H                  | <b>ED</b> , EDC, EASC   | \$   | Public                                  |  |
| <b>ED-LS-2.</b> Designate and promote Canyon Park as a life sciences cluster.   | S                   | H                  | <b>ED</b> , Life Science WA, WA Dept of Commerce, EASC                          | \$   | Public                                  |  |
| <b>CAPITAL INVESTMENTS</b>  |                     |                    |   |  |   |  |
| <del><b>ED-LS-3.</b> Implement the Transportation Actions, especially those that advance transit and non-motorized options.</del>   | <del>Ø</del>        | <del>H</del>       | <del>PW</del>   | <del>\$\$-\$</del>                         | <del>Public, frontage, TIF, grant</del> | <del>See Transportation section Capital Investments</del>                    |

Delete. already doing

Delete. already doing

Delete. redundant

## Natural Environment Actions

| Action   | Timing (S,M,L,O) | Priority (H,M,L) | Responsible Parties/ Partners (lead in bold) | Cost Estimate (\$, \$\$, \$\$\$, \$\$\$\$) | Potential Resources/ Funding | Related Actions  |
|--|------------------|------------------|--|--|------------------------------|--|
| <b>COUNCIL ACTIONS</b>   |                  |                  |  |  |                              |  |
| <b>NE-BE-1 and NE-SW-7.</b> Apply design standards and incentives for energy and water efficient buildings and GSI/LID development   | S                | H                | <b>CD, PC</b>                                | \$   | Public                       | Coincides with development regulations (LU-D-1 and 2) and should be balanced with affordable housing/commercial goals (LU-AH and LU-AC actions)        |
| <b>POLICY &amp; FUTURE EXPLORATION</b>   |                  |                  |  |  |                              |  |
| <b>NE-SW-2 and 3.</b> Study feasibility of regional stormwater detention facility and present options to property owners.  | O                | H                | <b>PW</b> , property owners                  | \$   | Public, grant                |  |
| <b>NE-SW-4, 5, and 6.</b> Explore opportunities to implement natural drainage systems and stormwater runoff treatment.   | O                | H                | <b>PW</b> , property owners, developers      | \$   | Public, grant                | Also see street design actions (T-SD)  |
| <b>NE-WR-2.</b> Study feasibility of other mitigation opportunities.   | O                | H                | <b>PW</b> , property owners                  | \$   | Public, grant                | This action is triggered If transportation impacts will exceed the mitigation accomplished through the North Creek wetland’s rehabilitation (NE-WR-1). |
| <b>NE-WR-3.</b> Study wetlands as flood control.   | O                | H                | <b>PW</b>                                    | \$   | Public, grant                |  |
| <b>NE-CA-1.</b> Consider development standards that allow for beaver activity.   | O                | M                | <b>PW, CD</b>                                | \$   | Public, grant                |  |
| <b>NE-CA-2.</b> Consider additional viewpoints and interpretive signage in the next PROS Plan update.  | M                | M                | <b>P&amp;R, CD, PW</b>                       | \$   | Public, grant                |  |
| <del><b>NE-CA-4.</b> Apply the city’s tree-retention and critical areas-regulations.</del>   |                  |                  |  |  |                              |  |
| <del><b>NE-CA-5.</b> On a case by case basis, potentially condition development to avoid the loss of vegetated areas not otherwise protected by critical area regulations such as on-vegetated slopes. Identify vegetated areas to protect through means other than critical area regulations.</del> | O                | H                | <b>CD, PW</b>                                | \$   | Public                       |  |
| <b>NE-BE-2.</b> Identify and encourage solar or other alternative energy programs.   | O                | M                | <b>PW, CD</b>                                | \$   | Public, grant                |  |

Delete, already doing

Clarified intent

| Action  | Timing (S,M,L,O) | Priority (H,M,L) | Responsible Parties/ Partners (lead in bold) | Cost Estimate (\$, \$\$, \$\$\$, \$\$\$\$) | Potential Resources/ Funding | Related Actions  |
|---|------------------|------------------|--|--|------------------------------|--|
| <b>COORDINATION WITH OTHER ENTITIES</b>   |                  |                  |  |  |                              |  |
| <b>NE-CA-3.</b> Support volunteer program to remove invasive species and plant native plants.         | S-L              | M                | <b>P&amp;R</b>                               | \$   | Public                       |  |
| <b>CAPITAL INVESTMENTS</b>  |                  |                  |  |  |                              |  |
| <b>NE-WR-1.</b> Mitigate transportation projects by rehabilitating North Creek's associated wetlands. | O                | H                | <b>PW</b>                                    | \$\$                                       | TIF, grant                   | Must occur prior to/in conjunction with 20th Ave SE extension (T-PB-2 M-2 and T-V-6 M-2) and 214th St SE extension (T-PB-2 M-1 and T-V-6M-3). If transportation impacts exceed mitigation achieved through this action, proceed to other opportunities feasibility study (NE-WR-2) |

# Transportation Actions

| Action   | Timing (S,M,L,O) | Priority (H,M,L) | Responsible Parties/ Partners (lead in bold) | Cost Estimate (\$, \$\$, \$\$\$, \$\$\$\$) | Potential Resources/ Funding | Related Actions  |
|--|------------------|------------------|--|--|------------------------------|--|
| <b>COUNCIL ACTIONS</b>   |                  |                  |  |  |                              |  |
| <b>T-V-4 and 19.</b> Require bicycle/ micromobility parking with development and parks.  | S                | M                | <b>PW</b> , CD, CC                           | \$   | Public                       | Coincides with zoning (LU-D-1 and 2), design standards (UD-BF-1 and 2 and LU-AC-2), and should be balanced with other public benefits achieved through incentives (affordable commercial (LU-AC-3 and 4), affordable housing (LU-AH-1) and green design (NE-BE-1)) |
| <b>T-V-13.</b> Require 17th Ave node east-west neighborhood center street to accommodate auto/bus access and ensure buildings can activate both sides of the street. | O                | H                | <b>PW</b> , CD, CC                           | \$   | Public                       | See vision for 17th Ave SE Neighborhood Center (page 12); Coordinate with North Creek bridge study (T-V-12)  |
| <b>T-V-15, 16, and 17.</b> Require emergency vehicle access on through-block connections and street extensions.  | S                | H                | <b>PW</b> , CD, CC                           | \$   | Public                       | Coincides with through-block connections actions (UD-TB-1 and 2) and also applies to 214th St SE street extension (T-PB-2 M-1 and T-V-6 M-3) and 20th Ave SE extension (T-PB-2 M-2 and T-V-6 M-2)  |
| <b>T-SD-1, 2, and 3.</b> Incorporate the plan's street cross sections into construction and design standards.  | S                | H                | <b>PW</b> , CD, CC                           | \$   | Public                       | High priority projects include 220th St SE north side shared use path (T-PB-3 O-1), bicycle facilities on 26th/29th Ave SE (T-PB-3 O-4), uphill climbing lanes on 26th Pl SE (T-PB-3 O-5) and 30th Dr SE/223rd St SE (T-PB-3 O-5). See Map 17 and Figures 49-55.   |
| <b>POLICY &amp; FUTURE EXPLORATION</b>   |                  |                  |  |  |                              |  |
| <b>T-PB-6.</b> Extend through-block connections as possible (even without redevelopment).  | O                | L                | <b>PW</b> , CD                               | \$   | Public, grant                | Also see design and other considerations for through-block connections (UD-TB-1, 2, and 3)   |
| <b>T-PB-X.</b> Seek funding for a wayfinding and signage plan.   | O                | L                | <b>PW/CD</b>                                 | \$   | Public                       | Also see wayfinding/signage requirement in design guidance (UD-BF-1)   |
| <b>T-PB-3 O-6.</b> Explore 228th St SE under I-405 pedestrian/ bicycle facilities options.   | M                | H                | <b>PW</b> , WSDOT                            | \$\$                                       | Grant                        | Coordinate with 228th St SE projects (T-V-5 C-8, 9, 10, and 11)  |
| <b>T-V-10 and 11.</b> Study the SR 527 corridor and intersection with 228th St SE.   | S                | H                | CT, SC, WSDOT, <b>PW</b> , CD                | \$   | Public, grant                | Could coordinate with transit priority study (T-T-2) and LOS policy considerations (T-LOS-1)   |
| <b>T-V-12.</b> Study feasibility of a North Creek vehicular bridge in 17th Ave node.   | L                | L                | <b>PW</b> , CD                               | \$\$                                       | Grant, public                | See vision for 17th Ave Neighborhood Center (page 12)  |
| <b>T-V-18.</b> Monitor parking and curb space needs; study and implement policies.   | O                | M                | <b>PW</b> , CD                               | \$   | Public                       | See shared parking (T-TDM-3) and parking program (T-TDM-X)   |

Delete; already required

New action

| Action  | Timing (S,M,L,O) | Priority (H,M,L) | Responsible Parties/ Partners (lead in bold)              | Cost Estimate (\$, \$\$, \$\$\$, \$\$\$\$) | Potential Resources/ Funding | Related Actions   |
|---|------------------|------------------|---|--|------------------------------|---|
| <b>T-LOS-1.</b> Revisit LOS policy if transit improvements make it necessary.   | M                | L                | PW, CD  | \$   | Public                       | T-V-10 (SR 527 study), T-T-2 (BAT lanes study)  |
| <b>T-PP-1.</b> Install 9th Ave SE safety improvements prior to connecting 214th St SE to 9th Ave SE   | L                | H                | PW, CD  | \$\$\$\$                                   | Public                       | 9th Ave SE improvements (T-V-6 M-3 and T-PB-1 C-1); 214th St SE/SR 527 intersection (T-V-6 M-4); 214th St SE extension (T-V-6 M-3 and T-PB-2 M-1) |
| <b>COORDINATION WITH OTHER ENTITIES</b>   |                  |                  |   |  |                              |   |
| <b>T-V-5 C-6 and T-PB-1 C-2.</b> Support WSDOT's I-405 direct access ETL ramps and 17th Ave SE east side cycle track, sidewalks, and crossings.       | S                | H                | <b>WSDOT</b> , PW   | \$\$                                       | WSDOT funding secured        | Coincides with SR 527/220th St SE intersection project (T-V-5 C-5); coordinate with NCT projects  |
| <b>T-V-5 C-7.</b> I-405 widening and SR 527 interchange   | S                | H                | <b>WSDOT</b> , PW   | N/A  | WSDOT                        | Coincides with I-405 ETL access ramps project (T-V-5 C-6)   |
| <b>T-PB-3 O-7.</b> Improve pedestrian/bicycle safety to access transit station at the southeast corner of Bothell-Everett Highway/I-405 intersection. | S                | H                | ST, WSDOT, PW   | \$   | Grant                        | This becomes less important after redevelopment occurs with a pedestrian bridge to the flyover station (UD-PR-2).                                 |
| <b>T-T-2.</b> Study SR 527 BAT lanes and transit signal priority feasibility.   | S                | H                | <b>CT</b> , WSDOT, Snohomish County, PW                   | \$   | CT                           | Include as part of SR 527 corridor study (T-V-10)   |
| <b>T-T-3.</b> Study parallel transit route east of Bothell-Everett Highway.   | M                | M                | <b>CT</b> , ST, PW  | \$   | CT                           | Include as part of SR 527 corridor study (T-V-10)   |
| <b>T-T-4.</b> Facilitate redevelopment of existing Canyon Park park-and-ride.   | O                | M                | <b>CD/PW</b> , CT, ST, WSDOT, property owners, developers | \$\$\$                                     | Private, grants              | See park-and-ride design and development actions (UD-PR-1, 3, and 4)  |
| <b>T-T-5.</b> Facilitate new park-and-ride on the south side of I-405 near the freeway transit station.   | O                | M                | <b>CD/PW</b> , ST, CT, WSDOT, property owners, developers | \$\$\$                                     | Private, grants              | See park-and-ride design and development actions (UD-PR-2, 3, and 4)  |
| <b>T-TDM-1, 2, and 3.</b> Secure ongoing funding, establish TDM program, and facilitate "last mile" trips and a shared parking program.               | S-L              | H                | <b>PW</b> , CT, ST, employers                             | \$\$                                       | Public, grant, private       | TDM projects (T-TDM-1, 2, 3, and 4)   |
| <del><b>T-V-9.</b> WSDOT's 17th Ave SE-ETL extension south of I-405.</del>  |                  |                  | <del><b>WSDOT</b></del>                                   |  |                              | <del>Canyon Park Place redevelopment actions (UD-PR-2 and 3)</del>  |

New action

Added 1st step to better understand TDM funding options

Delete; Outside of planning horizon

| Action   | Timing (S,M,L,O) | Priority (H,M,L) | Responsible Parties/ Partners (lead in bold) | Cost Estimate (\$, \$\$, \$\$\$, \$\$\$\$) | Potential Resources/ Funding | Related Actions  |
|--|------------------|------------------|--|--|------------------------------|--|
| <b>CAPITAL INVESTMENTS</b>   |                  |                  |  |  |                              |  |
| <b>T-PB-1 C-1 and T-V-5 C-1.</b> 9th Ave SE ped/bike facilities and arterial standard from 228th St SE to 208th St SE (SR 524) | L                | H                | <b>PW</b>                                    | \$\$\$\$                                   | TIF, grant                   | Must be completed before 214th St SE extension (T-V-6 M-3)                   |
| <b>T-PB-1 C-3.</b> NCT/220th St SE crossing and trail extension west to 17th Ave SE  | M                | M                | <b>PW</b>                                    | \$\$                                       | TIF?, grant                  | Coordinate with 220th St SE north side shared use path Frontage (T-PB-3 O-1) |
| <b>T-PB-2 M-1 and T-V-6 M-3.</b> 214th St SE extension and ped/bike facilities   | L                | H                | <b>PW</b>                                    | \$\$\$\$                                   | TIF, grant                   | 9th Ave SE ped/bike improvements must be in place first (T-V-5 C-1)          |
| <b>T-PB-2 M-2 and T-V-6 M-2.</b> 20th Ave SE extension to SR 524 and ped/bike facilities                                       | L                | H                | <b>PW</b>                                    | \$\$\$\$                                   | TIF, grant, private          | Coordinate with 20th Ave SE design (T-SD)                                    |
| <b>T-PB-3 O-1.</b> 220th St SE north side shared use path (NCT to 26th/29th Ave SE)  | O                | H                | <b>Developers, PW, CD</b>                    | \$\$                                       | Private, TIF?, grant         | Connects to NCT  |
| <b>T-PB-3 O-2.</b> 20th Ave SE (between 220th and 222nd), 222nd St SE, and 223rd St SE sharrows                                | O                | H                | <b>PW</b>                                    | \$   | Private, TIF?                | Connects neighborhoods northeast of Canyon Park to NCT                       |
| <b>T-PB-3 O-3.</b> 23rd Dr SE, 224th St SE, and 20th Ave SE south of 222nd St SE buffered bike lanes                           | O                | H                | <b>PW</b>                                    | \$   | Private, TIF?                | Also see street design (T-SD-1 and 2)  |
| <b>T-PB-3 O-4 and T-V-7 O-4.</b> 26th/29th Ave SE rechannelization and buffered bike lanes                                     | O                | H                | <b>PW</b>                                    | \$   | Private, TIF?, grant         | Also see vehicular improvements to 26th/29th Ave SE (T-V-7 O-4)              |
| <b>T-PB-3 O-5.</b> 26th Pl SE, 30th Dr SE, and 223rd St SE (between 30th Dr SE and 29th Dr SE) uphill climbing lanes           | O                | H                | <b>PW</b>                                    | \$   | Private, TIF?                | Also see street design (T-SD-1 and 2)  |
| <b>T-PB-4 R-1.</b> 17th Ave SE west side cycle track   | O                | M                | <b>Developers, PW, CD</b>                    | \$\$                                       | Private, grant               | Coordinate with 17th Ave SE/220th St SE intersection (T-V-7 O-2)             |
| <b>T-PB-4 R-2.</b> 220th St SE south side wide sidewalk  | O                | M                | <b>Developers, PW, CD</b>                    | \$\$                                       | Private, grant               | Also see street design (T-SD-1 and 2)  |
| <b>T-PB-5.</b> Other Canyon Park Pedestrian/Bicycle Plan (Map 10) projects   | O                | L                | Developers, PW, CD                           | \$-\$-\$                                   | Private                      |  |

| Action   | Timing (S,M,L,O) | Priority (H,M,L) | Responsible Parties/ Partners (lead in bold)   | Cost Estimate (\$, \$\$, \$\$\$, \$\$\$\$) | Potential Resources/ Funding | Related Actions   |
|--|------------------|------------------|--|--|------------------------------|---|
| <b>T-T-1.</b> SR 527 potential TSP   | O                | H                | <b>PW</b> , CT, WSDOT                          | \$\$                                       | TIF, grant                   | Follows or coincides with SR 527 7-lane configuration completion (T-V-5 C-4); TSP could be studied under SR 527 corridor study (T-V-10)   |
| <del><b>T-V-5 C-3.</b> SR 527/214th St SE intersection</del>   | <del>Θ</del>     | <del>L</del>     | <del>PW, WSDOT, CT</del>                       |  |                              | <del>Replaced by project T-V-6 M-4. Coordinate with SR 527 7-lane project (T-V-10) and 214th St SE extension (T-V-6 M-3)</del>  |
| <b>T-V-5 C-2 and 4 and T-V-6 M-1 and 4.</b> SR 527 seven-lane cross section and associated intersection improvements | M                | H                | <b>PW</b> , WSDOT, CT                          | \$\$\$\$                                   | TIF, grant, private          | Coordinate with other SR 527 projects (T-T-1, T-V-5 C-5) and depending on timing, 214th St SE extension (T-V-6 M-3)   |
| <b>T-V-5 C-5.</b> SR 527/220th St SE intersection  | S                | H                | <b>PW</b> , WSDOT                              | N/A  | WSDOT                        | Coincides with WSDOT ETL project T-V-5 C-6  |
| <b>T-V-5 C-8, 9, and 10.</b> 228th St SE intersections at Fitzgerald Rd, 29th Dr SE, 31st Ave SE intersection        | S                | M                | <b>PW</b>                                      | \$\$                                       | TIF, grant, private          | Coordinate with other 228th St SE project (T-V-5 C-11)  |
| <b>T-V-5 C-11.</b> Fitzgerald Rd (240th St SE to 228th St SE) widening   | O                | L                | <b>PW</b>                                      | \$\$                                       | TIF, grant, private          | Coordinate with other 228th St SE projects (T-V-5 C-8, C-9, and C-10)   |
| <b>T-V-7 O-2 M-5.</b> 17th Ave SE/220th St SE intersection (dual left-turn lanes)                                    | M                | M                | <b>PW</b> , property owners, developers, WSDOT | \$\$                                       | Private, TIF                 | Coordinate with 17th Ave SE west side cycle track (T-PB-4 R-1) and 220th St SE north side shared use path (T-PB-3 O-1). Though same location as WSDOT ETL project (T-V-5 C-6), <b>will likely occur with redevelopment (public-private partnership) after growth has surpassed the Canyon Park Subarea Plan EIS's No Action level of trips.</b> |
| <b>T-V-7 O-1.</b> 219th Pl SE extension  | O                | L                | <b>Property owners</b> , PW                    | \$\$                                       | Private                      | Coordinate with 9th Ave SE improvements (T-V-5 C-1 and T-PB-1 C-1)  |
| <b>T-V-7 O-3.</b> Traffic control for three CPBC intersections   | S                | M                | PW, property owners                            | \$\$\$                                     | Private, TIF?, grant         | <b>After growth has surpassed the Canyon Park Subarea Plan EIS's No Action level of trips, these intersections need to be improved. Also see CPBC streets design (T-SD-1, 2, and 3).</b>  |

Delete T-V-5 C-3 since replaced by T-V-6 M-4

Moved from Other projects to Mitigation project

Updates marked in red text

*Attachment 2 - Response to Public Comment Letters*

| REF      | COMMENT  | RESPONSE/STATUS  |
|----------|--|--|
| <b>1</b> | <b>Exhibit 1 (preferred alternative) Roger Belanich; 2/28/2020</b>   |  |
| 1a       | I support the Office/Residential-H for my property located between 17th Ave SE and the Bothell-Everett Hwy south of 220th Street. I anticipate that this would be a 100 foot office building with parking within the building as well as adjacent surface parking.   | OR-H proposed. Proposed base height 65 feet in OR-H, up to 85 feet with bonus.<br><br><b>COMMISSION FEEDBACK:</b><br>Staff recommends retaining current proposed heights. Additional code discussion scheduled for 10/21.  |
| 1b       | I also support the Office/Residential use for my four acres located on the southwest quadrant of I-405 and the Bothell-Everett Hwy. The City is considering the uses to be Office/Residential Med. As we discussed I support Office/Residential-H for this property. It is imperative to allow flexibility and allow the future to define the specific use of either residential or office to a maximum height of 100'.  | See response to comment 1a. Allows for a wide range of uses and only requires a mix on "primary" streets (e.g. 17 <sup>th</sup> ).   |
| 1c       | The Canyon Park Owners' Association supports a park on the 17 acres between T-Mobile and 31st Ave SE. It is essential that it be so designated Park in the Comp Plan, even though the City could reject a donation by me. It is very much a passive park now for employees as well as the neighborhood. The kind of park use could be determined later by the City should the City accept the property.  | Property noted in subarea plan as potential park; designation cannot apply until dedication. Implementation chapter includes an action to evaluate the property and pursue dedication if approved.   |
| <b>2</b> | <b>Exhibit 2 Cheryl Chikalla, Crystal Creek Townhomes; 3/4/2020</b>  |  |
| 2a       | At the previous meeting held on January 9th, HOA officers from both developments expressed concern about extending 214th out to 9th Ave in order to provide a throughway to connect Bothell Everett Highway and 9th Ave. We are concerned about the amount of traffic that would travel between both developments each day, the noise, the congestion, and the loss of the protected wetlands, if 214th were to be extended. Crystal Creek I is additionally concerned as to how we would exit out of our development, safely and in a timely manner, given that we are gated. Every owner who lives in Crystal Creek I considered the gate and the limited access, in particular, to our development. | Concerns noted. If 214 <sup>th</sup> is extended, additional design details would be needed to address access and safety issues and to determine specific wetland impacts and mitigation.  |
| 2b       | Why not consider extending 217th Place to 9th Ave? It would require accessing part of the drive and some of the existing parking spaces for Phillips, however, the portion of the road closest to Bothell Everett Highway, the fire station and Juno is already wide enough to handle two traffic lanes ( one in each direction), plus sidewalks. It appears there would be less of an intrusion into the protected wetlands to extend sidewalks along that whole corridor, as well.   | There are several reasons why 217 <sup>th</sup> was considered but not selected: 1) 217 <sup>th</sup> does not extend across SR 527 into the business park to the east and would not provide another direct access point without having to travel along SR 527, 2) Building this extension to the east would double the amount of new road and require a bridge crossing of North Creek, and 3) It would add |

|          |   |   |
|----------|---|---|
|          |   | another intersection to SR 527 which would likely exacerbate the traffic situation rather than help it.   |
| 2c       | At the previous meeting a suggestion was made by one of the people from your team that 214th become more of a bike path and pedestrian path to provide access from 9th Ave to Canyon Park shopping, transit, etc. Both Crystal Creek HOA boards were very supportive of that idea. It would maintain both of our developments and the wetlands, limit car traffic on 214th to those living at Crystal Creek I townhomes, yet provide access from 9th Ave. for foot-traffic or bicycles to the Canyon Park area.   | Upgrading the pedestrian/bicycle access on 214 <sup>th</sup> without extending the roadway to 9 <sup>th</sup> is an option in the plan. However, please note that without the 214 <sup>th</sup> roadway extension, the vehicular benefits will not be achieved and the City will not meet is corridor LOS requirements.   |
| 2d       | Finally, please consider syncing traffic lights along Bothell Everett Highway and within the Canyon Park area (now) for better traffic flow. Perhaps with some adjustments, traffic could flow better through the area without having to intrude on small neighborhoods or protected wetlands. With approximately 500 new housing units being built within the Canyon Park Business Park, it seems wise to be working on solutions to problems that exist today, while also keeping an eye on the future.   | The signals between SR 524 and 228 <sup>th</sup> St SE have recently had adaptive signal controls installed. They are in the start-up phase where there is still testing and modification going on with the programming. This is part of a corridor project across several jurisdictions and extends to the north along SR 527 to Mill Creek and up into south Everett. Even with this system syncing up the traffic signals, more improvements are necessary to achieve the City's corridor level of service (LOS) requirements in the area with the anticipated volume of traffic.  |
| <b>3</b> | <b>Exhibit 3 (preferred alternative), Van Ness Feldman for Canyon Park Business Center Owners Association (CPBCOA); 3/4/2020</b>  |   |
| 3a       | 1. The CPBCOA is extremely concerned that the City remains reluctant to accept dedication of the private roadways within the Park. Each of the alternatives, including the proposed Preferred Alternative, anticipates significant increases in land use intensity within the Park that cannot be accommodated by the existing road system. The CPBCOA does not have the legal authority or financial resources to expand the capacity of the roads, so these capacity issues cannot be addressed while the roads remain privately owned. The City's subarea plan treats these streets as though they are publicly owned and accessible, which is not currently legally accurate. | The plan has a 20+ year horizon that anticipates incremental change – that means the growth and the needed improvements will both happen over time. The subarea plan does not cause the growth – it anticipates likely scenarios, identifies potential impacts and describes a means of accommodating that growth to achieve better outcomes than would happen without the plan. Even without the plan, growth will continue to happen within the Park and roadway improvements will be needed.<br><br>The Planned Action Ordinance (PAO) requires that future development on the private road network acquire a certificate of capacity from the CPBCOA prior to development approval. This will provide |

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|    |   | <p>the CPBCOA and/or the City with a mechanism for obtaining roadway improvements from new development regardless of roadway ownership.</p>  |
| 3b | <p>2. The evaluation of the Preferred Alternative must include an analysis of all known related actions, including the WSDOT ETL and the Sound Transit Bus Maintenance Facility projects.</p>   | <p>The alternatives evaluated in the DEIS incorporated traffic forecasts from WSDOT’s I-405 ETL project. The addendum to the Draft EIS (7/9/2020) included an additional analysis of the Canyon Park Business Center’s private street system under the Preferred Alternative. As shared in the City’s response to Sound Transit’s scoping comment in Appendix A of the Draft EIS, the Sound Transit Bus Base qualifies as an essential public facility that must be evaluated by an independent Hearing Examiner who must approve a conditional use permit for the facility. Essential Public Facilities have additional approval criteria within Bothell Municipal Code Section 12.06.080(B)(2).</p> <p>Also, the City is considering a Planned Action for the subarea and there are limitations on covering essential public facilities that are not accessory to or part of a residential, office, school, commercial, recreational, service, or industrial development that is designated a planned action. (RCW 43.21c.440 (1)(f)).</p> |
| 3c | <p>3. The City must coordinate with WSDOT regarding transportation impacts and mitigations from ETL project. The increases in, and redistribution of, traffic volumes of the ETL project must be included in the analysis of the Preferred Alternative. Currently, our analysis is that the WSDOT design for the 17th Ave SE/220th St SE intersection is not adequate at initial construction to accommodate ETL traffic, let alone traffic growth based on the increased intensity proposed by the Preferred Alternative. The impacts of ETL traffic plus increased traffic proposed by the Preferred Alternative on other private streets and intersections within CPBC have yet to be analyzed by the City. Once these impacts are analyzed, sufficient mitigation must be proposed and included in the Sub-area Plan.</p> | <p>See response to comment 3b.</p> <p>The DEIS focused on public streets and indicated that an analysis of private streets would be made with the Preferred Alternative. The DEIS Addendum did analyze the impacts of the subarea plan preferred alternative on the internal, private streets; these are not subject to the City’s LOS standards but given the interest in proper operations, the results were developed and shared.</p>   |

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|    |   | <p>The intersection at 17<sup>th</sup> Ave SE/220<sup>th</sup> St SE has been identified to have a second westbound left turn from 220<sup>th</sup> St SE onto southbound 17<sup>th</sup> Ave SE added as mitigation.</p> <p>The intersections at 220<sup>th</sup> St SE/20<sup>th</sup> Ave SE; 220<sup>th</sup> St ST/26<sup>th</sup> Ave SE; and 223<sup>rd</sup> St SE/29<sup>th</sup> Dr SE have been identified to have improvements as well.</p>  |
| 3d | <p>4. As part of the ETL project, WSDOT has designed improvements to 17th Ave SE as mitigation for the impacts of the project. It is anticipated that 17th Ave SE will carry in excess of 3,200 vph during the PM peak hour. Given these volumes and the current design of 17th Ave SE, it is unclear how this can function as a "Neighborhood Center Street" as proposed by the Preferred Alternative.</p>   | <p>The Draft EIS Addendum included additional analysis of the 17th Ave/220th Street intersection, with results showing the intersection operating poorly during peak hours. The mitigation package for the preferred alternative includes adding a southbound receiving lane on 17th Ave and dual westbound left turn lanes at the intersection. The resultant LOS for the intersection is E.</p>  |
| 3e | <p>5. At the February 19 Planning Commission Study Session, the City's economic consultant indicated that new office space is not economically feasible in the Sub-area under present market conditions. The consultant offered no professional opinion on when, if ever, new office space would be economically feasible. Moreover, Page 2 of the March 4 Planning Commission staff report summarizes the Planning Commission's direction as, "The City should be patient and wait for preferred land uses instead of accepting whatever land uses are currently favored by the market." While it is the City's prerogative to select a Preferred Alternative that is admittedly economically infeasible for the foreseeable future, that lack of economic feasibility must be reflected in the evaluation of the Preferred Alternative. This evaluation must include the following:</p> <p>a. The buildable lands analysis for the Preferred Alternative must reflect the economic infeasibility of new office space. There are no recent historical "achieved densities" for office uses, and office use is not supported by the City's market analysis. Therefore, only uses supported by historical "achieved densities" or by a market analysis can be considered as components of future demand for redevelopment capacity.</p> <p>b. Since the City's economic consultant has determined that new office space is infeasible for the foreseeable future, the impacts of all "Office/Residential" land use designations (High, Medium, and Low) must be analyzed based on residential use. This includes trip generation, demand for public services and utilities, and resulting LOS for public services and utilities.</p> | <p>The market analysis indicates on page 17: "For the Canyon Park area, employment has continued to increase, with notable levels of investment to support accommodating these jobs." Permit records over 5 years show continuing and wide ranging investments. See Figures 8, 9, and 10 of the market study.</p> <p>The market study poses several scenarios for employment growth based on trend and regional growth strategies (Vision 2040 and Vision 2050). The Preferred Alternative is conservative in that it more closely matches the "low" projection. (Market Study Figure 11, pages 22-24).</p> <p>The Proforma analysis is meant to show what's feasible under current conditions and to identify barriers. Regarding mixed use that appears feasible today (as of the time of the study with pre-COVID information). The following conclusions were made</p> |

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|    |  | <p>about commercial redevelopment (see proforma ~page 25)</p> <ul style="list-style-type: none"> <li>• Commercial redevelopment projects in areas with frequent transit service are infeasible, but future changes in market conditions may spur these projects. ... there could be a potential for targeted, higher-end office products to be feasible, such as medical office uses. Possible increases in lease rates due to improved transit access may also promote redevelopment projects as well.</li> <li>• Owner-occupied projects could also be a form of new development in this area. (This is borne out by the permit history.)</li> <li>• The subarea should be managed to ensure that residential and mixed-use redevelopment does not outcompete commercial projects in the short term.</li> </ul> <p>The plan has a 20-year horizon. Market conditions will change and the plan will be updated periodically to reflect changes in conditions and vision for the subarea. Buildable lands analysis is a “snapshot” in time to estimate whether capacity exists for the anticipated growth – it is not a forecast or predictor of the amount or type of growth. The PAO establishes thresholds for transportation impacts based on trip generation regardless of whether it is from residential or office or manufacturing. Once that threshold is reached, additional analysis and mitigation is required.</p> |
| 3f | <p>6. The comparison between the No Action and Preferred Alternative LOS PM Peak Hour traffic is presented inaccurately. The No Action Alternative assumes that the City will not make any transportation improvements in the Subarea during the 20 year planning period. That is not realistic given the value of the Canyon Park Sub-area to the City in terms of tax base and economic development and the City's obligations under the GMA. The forecasted conditions for the No Action Alternative assumes that the City will not adequately plan for growth within</p> | <p>The No Action Alternative assumed transportation improvements in the subarea as outlined in Table 41 of the Draft EIS. These projects were either identified in the adopted 2035 Comprehensive Plan or are projects that were considered to be likely constructed within the 2043 horizon year of the</p>   |

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|    | <p>the Canyon Park Subarea, nor partner with other jurisdictions regarding traffic impacts and mitigation. Since the City is required to plan for growth and accommodate planned growth with capital improvements, many of the "mitigation" projects now proposed by the Preferred Alternative should also be included in the No Action Alternative. The <b>evaluation of the No Action Alternative should include a reasonable amount of City investment in transportation improvements during the planning period.</b></p>  | <p>subarea plan, such as the WSDOT ETL direct access ramps.</p>  |
| 3g | <p>7. Residential use in the Park is limited to a defined area of 72.75 acres pursuant to the CPBCOA CC&amp;Rs. For the areas within the Park proposed for "Office/Residential" use in the Preferred Alternative, only 18.09 acres is within the defined area where residential use is permitted by the CC&amp;Rs (Parcel Nos. 27053000106500, 27052900204600, 27052900204700, 27053000106400, 27053000106300, and 27052900204800.) Based on the CPBCOA CC&amp;Rs, residential use is not permitted on any of the other parcels designated for "Office/Residential" use in the Preferred Alternative. Since the City has not produced a market study that supports the feasibility of office use in the Sub-area and residential use is not permitted, <b>it is unclear what the City believes will happen in the area within the Park designated as "Office/Residential" by the Preferred Alternative.</b></p> | <p>Plans do not ensure development will occur exactly as envisioned. There are significant areas designated for residential development outside of the CPBCOA properties that may develop or redevelop before properties within the Park. If residential demand continues the CPBCOA may decide to lift restrictions on additional areas. In that case, the zoning will already be in place to ensure it can happen in accordance with the plan.</p>                       |
| 3h | <p>8. The Preferred Alternative proposes to add 4,225 new residents and 9,458 new employees to the Sub-area. Yet there are <b>only two new public spaces proposed</b>, and one is at the south end of the Sub-area. This is <b>completely inadequate to support the proposed growth in residents and employees. Additional City investment in public spaces and urban design features is necessary to mitigate the impacts of the proposed additional intensity.</b></p>  | <p>There are two public parks within the subarea, Centennial and Cedar Grove. The plan contains policies regarding the need for additional parks, recreation and public amenities. A 17-acre parcel has been identified as a potential future natural/passive recreation area on the east side of the subarea. The policies tie the need to areas of future development and actions identify potential funding sources and the need to update the citywide parks plan.</p> |
| 3i | <p>9. <b>Stormwater regulations need to be factored into all pro-formas as either an increased cost for compliance or a decreased yield to accommodate stormwater infrastructure.</b> Simply because the regulations apply uniformly to all new development does not mean that the impacts to the economic feasibility of projects can be dismissed. The economic effects of the stormwater regulations must be reflected in the yet-to-be-issued pro-formas to determine the economic feasibility of the Preferred Alternative.</p>  | <p>The proforma does include assumptions about stormwater infrastructure and the assumptions were reviewed by Pertee engineers. See pages 12-13 of the proforma. The proformas were made available to the commenter and public in May 2020; see project website for <a href="#">Draft Market Study and Proforma Analysis - May 2020</a>. Further results were shared with the commenter at stakeholder meetings and with the Commission</p>                                |
| 3j | <p>10. Similarly, the <b>pro-formas must include all of the additional costs of development that are proposed by the Preferred Alternative regulations, including, but not limited to, affordable</b></p>   | <p>The proformas were based on conceptual site plans that accounted for the desired amenities. The</p>   |

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|                 | <p>housing, affordable commercial space, public space requirements, requirements for a new "neighborhood center street," ground floor retail requirements, wetland/stream buffer enhancement requirements, and increased impact fees to fund transportation, parks and public services.</p>   | <p>proformas also addressed the inclusion of affordable housing requirements. Current impact fees, permitting, and a range of other soft costs were assumed. The City will be incorporating the transportation improvements into its impact fee basis and will account for a public share of funds; the private share is not yet known. However, the proforma analysis is conceptual and conservative in its use of regional and local factors. It is meant to demonstrate what is feasible today and what levers the City could use to make development feasible (e.g. parking standards).</p>   |
| <p><b>4</b></p> | <p><b>Exhibit 4 Ann Aagaard; 6/26/2020</b></p>  |   |
|                 | <p>This Subarea Plan is NOT the appropriate venue for establishing a best available science protocol and CANNOT be used as method for making a recommendation to amending the Bothell Critical Areas regulations or the Shoreline Master Program for the City of Bothell. The following statement implies that BAS could be established, and that changes to the Bothell CAO, SMP could be facilitated by recommendations in this Subarea Plan Action. The Subarea plan adoption process under GMA is required to be consistent with and implement the existing Critical Areas Ordinance. It CANNOT set policy or actions for amending the CAO.</p> <p>In addition, the CAO in Bothell SMP for a Class I wetland (assuming the wetland north of 214<sup>th</sup> St. S.E. is Class I) is required to have a 75' buffer. This cannot be reduced by developer incentive or credits transferred from other existing buffers. Mitigation banks are allowed for compensatory mitigation, NOT for buffer reductions.</p> <p><b>Remove these two sections: found on page 43.</b></p> <p>Buffer Enhancement</p> <p>Much of Canyon Park was constructed prior to the adoption of critical areas regulations and current best available science. Fortunately, buffers were established to protect wetlands, and streams were included in the development of the area. Wetland and stream buffers are of varying dimension with some being quite large and others being fairly small compared to current standards.</p> <p>Future redevelopment of the area offers the opportunity to enhance these existing buffers while maximizing a site's available area. As a development incentive, a developer could be allowed to reduce a wetland/stream buffer to the edge of existing development provided the</p> | <p>The Downtown and Fitzgerald subareas both have different standards than the citywide regulations. Some Downtown standards are reduced in recognition of existing, urban level development. Some Fitzgerald standards are increased due to the high fish habitat value of North Creek and its tributaries in that subarea. Canyon Park has a level of development that is different than other subareas.</p> <p>There is an update of critical areas underway that will provide more information for the policy discussion on this issue.</p> <p><b>COMMISSION FEEDBACK:</b><br/>Staff recommends that the section on buffer enhancement (p. 60 of the draft plan) be retained and that the proposed action be revised to "Evaluate the potential for applying different buffer requirements for the subarea in conjunction with the CAO update."</p> |

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|          | <p>biological functions and values of the existing buffer (and associated wetland/stream) are increased.</p> <p>Action:<br/>Establish a best available science protocol within the Bothell Critical Areas regulations where existing buffers are enhanced in exchange for a reduction in the standard buffer width. Ensure that such reduced buffers result in improved biological functions and values.</p>  |   |
| <b>5</b> | <b>Exhibit 5 Van Ness Feldman for CPBCOA (WSDOT project); 6/25/2020</b>   |   |
| 5a       | <p>Our analysis indicates that the traffic growth rates used for the "No Action" alternative in the Environmental Assessment ("EA") for the ETL Project are not based on valid land use assumptions. The "No Action" alternative traffic growth rate does not utilize a specific land use analysis that projects future growth within the CPBC based on the existing City Comprehensive Plan and zoning designations, as well as the existing development conditions and constraints. Instead, an aggregate regional growth rate of more than 40% is applied to the internal private intersections in the CPBC.</p> <p>This results in a significantly higher "No Action" baseline condition against which the "Action" alternative is then compared. The result is that the impacts of the "Action" alternative are muted and proportionately less than they would be under a "No Action" alternative that used valid land use assumptions to project future traffic growth. Correspondingly, the mitigations proposed by WSDOT for the "Action" alternative are reduced and will not be adequate for the actual impacts that result from the ETL project.</p> | <p>These comments are about the assumptions and methodology of the analysis conducted by WSDOT for the I-405 express toll lane (ETL) project. The City's role on the ETL project is coordination, which is ongoing. Additional information about the City's assumptions and methodology in response to these questions was provided to the CPBCOA. Additional analysis was conducted and included in the DEIS addendum issued July 9, 2020.</p> <p>The City concurs with the transportation analysis performed by WSDOT and feels it is reasonable. ETL volumes have been coordinated with WSDOT to ensure they are included in the City's Canyon Park Subarea Plan analyses.</p> |
| 5b       | <p>The current design of the 17th Ave SE/220th St SE intersection does not provide adequate capacity for northbound traffic in the PM peak hour beginning in 2025, which is the year of opening for the ETL project. This inadequate capacity exacerbates in years after 2025. Since the City is considering accepting dedication of 17th Ave SE, the 17th Ave SE/220 St SE intersection, and the section of 220th St SE between 17th Ave SE and SR527 in 2025, the City should be aware of this. The CPBCOA is very concerned that the City is planning to accept dedication of an intersection and roadway that is known to have inadequate capacity and level of service and that will need to be immediately improved at taxpayer expense. Please be aware that we will protest any effort to require CPBCOA property owners to contribute to the solution for an intersection that was known by the City to have inadequate capacity from the day it opened.</p>   | <p>See response to comment 5a.</p>  |
| <b>6</b> | <b>Exhibit 6 Mike Read, TENW for CPBCOA (WSDOT project)</b>   | <b>Same response as Exhibit 5</b>   |
| 6a       | No Action Traffic Forecasts: As a baseline, the mitigation approach in the preliminary traffic  | See response to comment 5a.   |

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|    | <p>operational and queuing analysis provided to TENW is only compared to a future No Action condition. With inflated background growth assumptions, the conclusion on project impacts to intersection levels of service and vehicle queuing conditions within the CPBCOA are lost in a growth rate that is not applicable to interior private roadways within the existing business park. With a regional aggregate growth rate of more than 40% applied to interior private intersections, the added congestion and vehicle queuing that becomes "assumed in the future" within the business park generates unreasonable conditions from which to measure impacts of the WSDOT project.</p>  |                             |
| 6b | <p>Intersection Capacity of 220<sup>th</sup> Street SE/17<sup>th</sup> Avenue SE. The projected traffic demand of PM peak hour traffic exiting via 17th Avenue SE by WSDOT is 775 vehicles per hour (vph). This peak directional forecast is a direct result of the proposed ETL Direct Access Ramp and is equivalent to more than 2 turning lanes of left turning capacity (this is regardless of the analytical framework or traffic analysis assumptions presented by WSDOT). At year of opening (2025), the total northbound left turning traffic demand from 17th Avenue SE onto 220<sup>th</sup> during the PM peak hour is forecast by WSDOT as 1,000 vph. As such, basic capacity at this signalized intersection is not provided under the current WSDOT channelization proposal, and would create significant adverse impacts to both traffic flow and safety at this intersection and private driveways along 17<sup>th</sup>. We continue to recommend that additional intersection capacity be built at this intersection to mitigate the adverse traffic impacts generated by the proposed ETL Direct Access Ramp into the business park. In addition, during our last meeting between WSDOT and our Team in March 2020, the traffic operational assumptions (i.e., signal timing/performance) included in the Action Alternative were confirmed as something that "would not be implemented" in the field. As such, under the decisions of intersection geometry and signal operations by WSDOT, the mitigation analysis of direct project impacts cannot be understood or measured.</p> | See response to comment 5a. |
| 6c | <p>City Comments/Concurrence on Study Assumptions and Methods. CPBCOA has yet to receive any concurrence from the City of Bothell on the review and acceptance by the City of WSDOT study assumptions, methods, or conclusions on the ETL Direct Access Ramp project. Given other comprehensive plan amendment, zoning, and private street conversion into public roadways under consideration by the City and CBCOA, we want to recognize that our Team cannot agree to any mitigation agreement or proposals until we also understand that the City will also accept the proposed public infrastructure that would be converted within the existing private roadway system currently owned by CPBCOA.</p> <p>In addition to the absence of City concurrence, neither the City's ongoing Subarea Planning within Canyon Park or WSDOT's analysis of the ETL Direct Access Ramp into the subarea are dependent or relying on each other's work. As an example, WSDOT assumes only currently</p>   | See response to comment 5a. |

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|          | <p>funded transportation improvements, while as the City's comprehensive planning process allows for assumed additional improvements that do not yet have committed funding. To ensure consistency, at a minimum the City's planning process should only assume those currently funded projects used in WSDOT's ETL Direct Access Ramp project as a „baseline% and then evaluate other potential regional and local projects to support the alternative land use assumptions under consideration in the Subarea. This methodology will also inform both the City and WSDOT on the direct impacts that „new arterial roadway connections% into the CPBCOA that could result as part of ETL Direct Access Ramp project.</p> <p>Beyond the transportation network inconsistencies, the other significant difference between these two efforts is evaluating impacts of land use assumptions. The City's current Subarea Planning efforts envision significant increases in the density and types of land uses within the CPBCOA itself and the surrounding vicinity. As noted above, WSDOT did not apply any direct land use assumptions within the CPBCOA properties or local vicinity, but only factored local traffic volumes (beyond those directly generated by the new ETL Direct Access Ramp) using a regional growth factor. If any of the currently published land use scenarios or potential variants likely under the Subarea Plan are adopted, the transportation infrastructure as part of the WSDOT ETL Direct Access Ramp and for the Canyon Park Subarea as a whole would fail any measure of concurrency or mobility performance measure of intersection level of service, congestion, or safety.</p> |                             |
| <b>7</b> | <b>Exhibit 7 Roger Belanich; 7/1/2020</b>   |                             |
| 7a       | <p>1. Once again, as in my testimony included in my letter of February 28th, I <b>support Office/Residential H (100 feet in height of buildings)</b>. The use of development for office conforms to the City's idea on spacing. Canyon Park is a notable area of Medical instruments as well as Biotech. The intended Comp Plan supports Life Science Cluster. The southwest quadrant of SR527 and 1-405 is adjacent to CBPC as well as the Phillips Company for medical instruments as well as Juno Biotech Research. The same is true for Office/Residential H on the property which I own on the southeast intersection of SR527 and 220th Street SE within CPBC. These two properties would support as office buildings the Transportation HUB as envisioned in the Comprehensive Plan; ATT2. <b>Office/Residential H should be adopted for these properties for reasons explained in my of letter February 28th</b></p>  | See response to comment 1a. |
| 7b       | <p>2. Re ATT2: The Plan's evaluate <b>extending 214th Street from CPBC to 9th and 20th Ave SE to Maltby Road (Hwy 534)</b>. See ATT1 page 6. These both reduce LOS on Highway 527 as well as the intersection of Thrasher's Corner. <b>These should be adopted.</b></p>   | Comment noted.              |
| 7c       | <p>3. AH2 Urban Design Livability Private Natural Area Eastern Portion of Sub Area, Page 12, the text quotes: "The property</p>   | See response to comment 1c. |

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|           | owner is interested in the City acquiring the property for public use". In fact, as the owner, I will dedicate the entire 17 acres for a park at no cost to the City. (See my letter to Bruce Blackburn of February 28, 2020.)  |  |
| 7d        | <p>4. ATT3 Storm Water</p> <p>The Comp Plan must recognize and adopt the storm water system as now provided in Canyon Park Business Center. This should include the massive detention pond for the storm water. However, I agree that the detention pond should be restored to its original capacity. As the developer of that detention pond, I must contradict the City's portrayal of its' capacity. It was designed for an entire basin, which has been largely developed and has its' own individual detention. Therefore, it has, as originally designed and originally built, excess capacity beyond the requirement of the built out CPBC. At least this should be evaluated as an inclusion in the Comp Plan.</p>  | Mitigation measures in the Planned Action Ordinance address stormwater requirements. Development is encouraged to participate in this regional system or meet higher standards on their own. See Planned Action Ordinance Exhibit B-3. |
| <b>8</b>  | <b>Exhibit 8 Same as Exhibit 1</b>  | See response to Exhibit 7.   |
| <b>9</b>  | <b>Exhibit 9 Carson Moscoso, Snohomish Conservation District; 7/8/2020</b>  |  |
| 9a        | <p>My name is Carson Moscoso and I am an ecologist at the Snohomish Conservation District. The Snohomish Conservation District is a small public organization that focuses on the protection of natural resources in Snohomish County. One of our primary focuses is leveraging public funding to restore streams, rivers, and wetlands.</p> <p>I'm reaching out to your company because I've noticed that CPBC-43 LLC owns a parcel along North Creek at 2319 228th St SE, Bothell, WA (parcel #27052900303900). The property I'm referring to is in the map below:</p> <p>From viewing historical aerial photos, it appears that this property has sat mostly vacant for the past 30 years. I'm curious what your company's intentions are for this parcel? If you have no development interests, the Snohomish Conservation District would be very interested in using grant funding to plant this property with native trees and shrubs with the intention of improving water quality in North Creek.</p> | See response to comment 7d.  |
| <b>10</b> | <b>Exhibit 10 Ann Aagaard; 7/21/2020</b>  |  |
| 10a       | <b>1. Support bike/pedestrian trail only south of 214<sup>th</sup>. Do not support street extension of 214 S.E. from BEH to 9<sup>th</sup> Ave. S.E.</b>  | Comment noted.   |
| 10b       | <b>2. Buffer Enhancement : pg. 60. Reject wording in Canyon Park Draft Subarea Plan pg. 60. Adopt buffer widths recommended by Department of Ecology (Wetlands in Washington State, Volume 2: Guidance for Protecting and Managing Wetlands and Wetland Guidance for CAO Updates( Western Washington) (Ecology Publication #16-06-001, June 2016) These standards based on Best Available Science will be considered by Planning Commission September 2020. Standards for Buffers.</b>  | See response to comment 4.   |

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| 10c | <p><b>Mitigation Banks: Rewrite Pg. 91. Retain current priority for compensatory mitigation in same sub-basin. Allow compensatory mitigation within Canyon Park Subarea with certain conditions. Do not support mitigation banks or fee in lieu.</b></p>  | <p>Comment noted. The narrative is describing the existing conditions and noting the challenges of mitigation. There is not a proposal to change the existing policies or code requirements.</p> |
| 10d | <p>Discussion on these important issues:</p> <p>The Planning Commission meetings of July 1 and 8 did not include P.C. recommendations regarding <b>Policy Question 7</b> regarding extension of 214<sup>th</sup> St. S.E. from BEH to 9<sup>th</sup> Ave. S.E.. It did not include a recommendation if not extended( 214<sup>th</sup> SE to BEH) <b>Policy Question 9</b> ( 214<sup>th</sup> SE) should it be substituted with a pedestrian and bike path?</p> <p>However, the recently available <b>Draft Subarea Plan does</b> include recommendations regarding 214<sup>th</sup> and the trails. (questions 7 &amp; 9) ,Buffer enhancement, and mitigation banking.</p>  | <p>Comment noted.</p>  |
| 10e | <p>Page 102 of <b>Draft Subarea Plan regarding 2014<sup>th</sup> S.E. ;</b><br/> The preferred (option1) alternative is to build the vehicular access between 9<sup>th</sup> Ave. S.E. and BEH, pg. 105; (map) pg. 107; Mitigation project M-1.</p> <p>“Extend 214<sup>th</sup> SE westward to 9<sup>th</sup> Ave. SE. including pedestrian/ bicycle facilities.”</p> <p>This recommended alternative includes the statement “ if extending a trail only, add sharrows to the existing street.” Also, included in the recommended action is the sentence on pg. 102 to “improve 9<sup>th</sup> Ave. SE with ample pedestrian and bicycle facilities prior to extending 214<sup>th</sup> S.E. ” Please explain add ‘ sharrows to the existing street’. I <b>support improving 9<sup>th</sup> Ave. SE with ample pedestrian and bicycle facilities.</b></p> <p>I <b>strongly disagree with this preferred alternative to “build the vehicular access between 9<sup>th</sup> Ave. S.E. and BEH”. I support building a trail/ pedestrian access <u>only</u> on the south side of 214<sup>th</sup> S.E. I request that the Planning Commission <u>support and recommend to the Bothell City Council a bicycle/ trail/pedestrian only</u> alternative, the improvement of bike facilities on the existing 9<sup>th</sup> Ave. SE.</b></p> | <p>Comment noted.</p>  |
| 10f | <p><b>M-3 pg. 114 includes an alternative of trail only westward from 11<sup>th</sup> Dr. SE to 9<sup>th</sup> Ave. S.E. Request: Please clarify what this alternative involves.</b></p> <p>Rationale for recommendation “ <b>NO (214<sup>th</sup> SE) for street alternative” .</b><br/> 214<sup>th</sup> between 9<sup>th</sup> Ave. SE and BEH is bounded on the north by Centennial Park which includes a large open water Class I wetland and North Creek with a designation of <b>NATURAL</b> under the Bothell Shoreline Master Program( BSMP). The associated wetland area on the south side of</p>   | <p>Comment noted.</p>  |

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|            | <p>214 S.E. ( if extended) is also designated <b>NATURAL</b> under the BSMP. The BSMP designations for areas on the south side of 214 S.E. near the BEH where there is an existing bridge over North Creek include a small area of High Intensity near the BEH intersection. The additional designations for North Creek and Associated wetlands next to the BEH are small Shoreline Residential and Urban Conservancy areas. A 150' buffer for the Natural Designation is the BSMP required buffer. Bridges, Roads, Bike and pedestrian paths require Conditional Use Permits in the Natural Designation. Within this Natural BSMP designation activities are <b>limited</b> to very few active uses.</p>  |   |
| <p>10g</p> | <p><b>Buffer Enhancement pg. 60.</b><br/>Action 1 in this section:</p> <p>“Establish a best available science protocol with the Bothell Critical Areas Ordinance (BCAO) regulations where existing buffers are enhanced in exchange for a reduction in the standard buffer width. Ensure that such reduced buffers result in improved biological functions and values.”</p> <p>This discussion titled ‘Best Available Science’ includes the statement <i>“buffers for wetlands and streams would be implemented consistent with the Planned Action Ordinance and City codes, including codes for nonconforming development ... in more simple terms, design sensitive to the site must be employed.”</i></p> <p>Best Available Science protocol is currently included and was employed in developing the BCAO and BSMP. Standard buffer widths are allowed to be reduced with mitigation, but there is a limit to the buffer reduction allowed. That limitation to the buffer size reduction is based on BAS, and when Bothell finally meets their required CAO update( scheduled be considered by PC in September) the buffers established will be based on the Department of Ecology’s 2016 standards and on Best Available Science. ( see reference above). <b>A Planned Action Ordinance cannot determine buffers or dictate “ design sensitive to site be employed’ for wetlands and streams.</b> Adopted standards for nonconforming uses adopted by DOE are included in the BSMP 13.15.050 and 13.13.010 K.3 c</p> <p>Buffers for wetlands and streams are determined by the Bothell Shoreline Master Program and the Bothell Critical Areas Ordinance. Mitigation sequencing currently is required in both the BSMP and BCAO.</p> | <p>See response to comment 4. Staff is recommending revising the action to evaluate this issue through the CAO update.</p> <p>The Planned Action Ordinance was referencing that there would be a consistency review with critical area regulations, and that until the City completed the citywide regulations it could condition development in the Planned Action area to be consistent with referenced state manuals to ensure avoidance of impacts. A Planned Action Ordinance includes mitigation measures as a main purpose. It is appropriate to include measures if there are gaps – e.g. that citywide critical area regulations are in the process of being updated and the City could condition development as appropriate to meet best available science while that citywide process was ongoing.</p> |

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| 10h  | <p><b>Page 84. Goals and Policies.</b> NE-1-8. Note on NE-3. Maintain and improve recreational access to North Creek and natural areas for residents and workers, allowing for enjoyment of these natural systems.</p> <p>This policy may conflict with the limitations on Active Uses in the Natural Environment Designation of the BSMP east of BEH along 214<sup>th</sup> S.E. if extended.</p>   | <p>Comment noted. Any additional access to North Creek would need to comply with the regulations of the BSMP.</p>   |
| 10i  | <p><b>Pg. 91. Wetland and Riparian Mitigation/ Restoration Projects.</b></p> <p>I support the Planning Commission discussion of wetland mitigation projects and restoration projects that require and prioritize mitigation within this Subarea and within the sub-basin. The adopted BCAO requires compensatory mitigation in same sub-basin. BSMP compensatory mitigation has a sequence of mitigation priorities( as listed in the recent draft plan) and required in the current Bothell Critical Areas Ordinance.</p> <p>Mitigation should be confined to the sub-basin, and then to this Subarea. The natural environment, wetlands, and streams in this area have high restoration opportunities and potential for improvement, and will be subject to increased impacts from large numbers of people, traffic, building, redevelopment, and new development activities</p> | <p>See response to comment 10c.</p>   |
| <p><b>11 Exhibit 11 Van Ness Feldman for CPBCOA; 7/22/2020</b></p> |  |   |
| 11a  | <p>Inadequate Public Engagement</p> <p>The Subarea Plan materials provided to date boast about the significant public engagement that the City's Planning Department staff has undertaken regarding the Subarea Plan. It is true -the City Planning staff has repeatedly reached out and provided the CPBCOA members and Board with briefings regarding the Subarea Plan efforts. To date, however, the City has not addressed the myriad concerns raised by the CPBCOA members and Board during those meetings.</p>   | <p>The concerns expressed generally revolve around two related issues: 1) the city assuming ownership of private roadways within the Park; and 2) adequate mitigation for the increased traffic resulting from growth. The subarea plan may not be able to address the concerns to the degree desired by the CPBCOA.</p> <p>This plan is an update to the existing subarea plan in order to comply with the requirements of the regional growth center designation, to adjust for the amount of growth that has occurred, and to plan for additional anticipated growth - it meets state, city and PSRC requirements. See response to comment 3a.</p> |
| 11b  | <p>The Owners' Association Does Not Support the Subarea Plan as Currently Formulated</p> <p>As noted in the City's Market Study, the CPBCOA is the largest private land owner in the Subarea. The CPBCOA does not support the City's plan as currently formulated. Our members</p>   | <p>Comment noted.</p>   |

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|     | <p>include the majority of the other major land owners in the Subarea. They also do not support your plan.</p> <p>We acknowledge that City staff has reported meeting with some life science tenants in the Canyon Park Subarea and reported that those entities support the Subarea Plan. Since representatives from the Owners' Association were not at those meetings, we cannot say whether or to what degree City staff explained the significant transportation failures that the Subarea Plan will exacerbate. We believe that is unlikely, since the City only recently released its transportation analysis of the preferred alternative for the Subarea Plan. In any case, the owners of the buildings where many of those tenants are located do not support the current plan.</p> <p>The transportation analysis shows that the road network in the Subarea is either failing or close to failing now, and will fail in the future. Numerous intersections in the Park will function at LOS F as identified in the transportation analysis. This is not an acceptable outcome, regardless of how transportation concurrency is defined by the City.</p> <p>The market and proforma analysis shows that only a mixed use residential/commercial redevelopment (with a significant MFTE program and impact fee reductions) is economically feasible. The Park does not permit residential in the majority of places where the City is "planning" for residential mixed use. It is unclear how the City intends to change the economics of redevelopment in the Subarea or the prohibition of residential use in the majority of the Park, but unless the City can accomplish both, the Subarea Plan is not viable.</p> | <p>The transportation analysis evaluated each alternative against the transportation standards, which are corridor based. The mitigation package for the preferred alternative identified improvement projects to meet the LOS E corridor standard, however some intersections along the measure corridors would operate at LOS F during peak hours.</p> <p>The subarea plan identifies improvements within the business park to improve traffic operations with increased growth, including signaling intersections.</p> <p>The plan has a 20+ year horizon. Market conditions will change and the plan will be updated periodically to reflect changes in conditions and vision for the subarea. See response to 3e.</p> |
| 11c | <p>Further, the draft Subarea Plan includes an extensive vision for the road network within the Park, but there also is no basis for implementing that vision. All of the roadways within the CPBC are privately owned - subject to a limited easement granted to the Owners within the Park for ingress and egress that supports the Park's pre-existing development plan. For the past three years, the Owners' Association has sought to negotiate with City staff to transfer the roads to the City, but negotiations have recently fallen apart because the City continues to layer on costly conditions to the dedication. The existing road system is adequate to support the development currently within the Park, but it is often congested within the Park due to inadequate road capacity outside of the Park. The existing roads are not, however, sufficient to support the additional development and density that the City intends to require in the Park through the Subarea Plan and development regulations.</p>  | <p>The subarea plan identifies improvements within the business park to improve traffic operations with increased growth, including signaling intersections.</p>   |
| 11d | <p>At this point, the City has set up a Hobbesian choice. We can either accept the "no action" alternative in which the City makes no zoning changes and also makes no effort to improve the abysmal transportation conditions, or we can accept the updated Subarea Plan in which</p>   | <p>If the No Action is selected, the transportation projects identified in the existing adopted Comprehensive Plan are still in the City's plan to</p>   |

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|                  | <p>City increases density and provides a meager list of transportation improvements, nearly all of which are predicated on uncertain funding through the Puget Sound Regional Council or other agencies, and which the analysis shows will not actually solve the transportation issues. Under either, we end up with a failed transportation network, rather than a vibrant subarea or a functional regional growth center.</p>  | <p>accomplish. Prior to the 2035 horizon year of the existing Comprehensive Plan, there will be an update that will extend the planning period to the subarea plan's horizon year. It is anticipated the update would generate more transportation projects to accommodate the anticipated growth in the years beyond 2035. All agencies in the Puget Sound region rely on grant funding from state and federal sources for transportation improvements. This is a consistent source of funding that the City has been successful in tapping. The preferred alternative results in a LOS that meets the City's current adopted requirements. The proposed plan is intended to create a more vibrant regional growth center which would provide better opportunity to meet transportation needs.</p> |
| <p><b>12</b></p> | <p><b>Exhibit 12 Van Ness Feldman for CPBCOA; 9/1/2020</b></p>  |   |
| <p>12a</p>       | <p>The Owners' Association's chief concerns with the draft Subarea Plan revolve around insufficient transportation planning and capital improvements. This is particularly concerning considering the combined growth arising from the Subarea Plan, the Express Toll Lane (ETL) project at SR-527 proposed by Washington State Department of Transportation (WSDOT), and Sound Transit's (ST) desire to develop and operate their Bus Base North within the CPBC. Specifically, the Owners' Association believes that any successful subarea planning effort for Canyon Park must achieve the following:</p> <ul style="list-style-type: none"> <li>• Ensure traffic congestion inside the Park and on roads outside the Park (SR-527, I-405, 228th Street) does not reach failing level of service (LOS) under any planning option –including the No Action Alternative</li> <li>• Demonstrate how transit-oriented solutions will reduce traffic congestion in and around the Park</li> <li>• Ensure cumulative traffic impacts attributable to the City's Subarea Plan, WSDOT's ETL project and ST's Bus Base project are adequately mitigated by each respective agency.</li> <li>• Provide adequate police presence within the Park to ensure residential development is compatible with anticipated traffic levels</li> <li>• Ensure the road system within the Park can adequately support the new development and re-development contemplated within the Subarea Plan</li> <li>• Avoid disproportionate burdens on property owners within the Park to fund traffic mitigation on the internal road network arising from growth outside the Park</li> </ul> | <p>Transportation concurrency is met today. The adopted 2035 Comprehensive Plan considers long-term growth in the City and shows the City meeting concurrency standards in year 2035. See additional responses to Exhibit 12.</p> <p>The Canyon Park Subarea Plan preferred alternative also meets the concurrency requirement including accounting for WSDOT's ETL project. The plan proposes improvements to address traffic congestion within the business park.</p>   |

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| 12b | <p>The Subarea Plan, as drafted, fails to demonstrate how each of these important benchmarks will be achieved. We request that the City revise the Plan, prior to adoption, to include each of these components. Our recommendations below address how the Plan can achieve these.</p> <p>1. <b>The City Should First Commit to Meeting Concurrency Standards Before Adding Density</b></p> <p>The draft Subarea Plan shows that under the No Action Alternative, the City will not meet adopted concurrency standards for either the SR-527 or SR-524 corridors with currently planned traffic improvements. Common sense would dictate that the City identify traffic improvements and mitigation measures that keep these corridors from dropping below a failing LOS before planning to increase density to the Canyon Park Subarea. The City has a legal obligation under the Growth Management Act to ensure that transportation improvements or strategies to accommodate the impacts of development are made concurrent with the development. As noted in the Comprehensive Plan, <b>failure to achieve concurrency may result in the City needing to implement land use policies that reduce – not intensify – density.</b></p> <p>Before adopting a plan to increase density and development within the Canyon Park Subarea, the Owners’ Association would like the City to first identify and implement transportation programs and capital improvements that prevent the SR-527 and SR-524 corridors from falling below LOS-F standards under the existing Canyon Park Subarea Plan. The 2015 periodic update to the City’s Comprehensive Plan forecasted LOS-E for these corridors in the planning horizon year of 2035. Less than 5 years after adoption of the 2015 periodic update, the transportation analysis prepared to support the amendments to the Subarea Plan forecast LOS-F for the SR-527 and SR-524 corridors in the horizon year of 2043. In conjunction with the Subarea Plan, the City should include additional improvements in the Capital Facilities Program, identify actual funding sources for those improvements, and address environmental feasibility of each to ensure that even the No Action Alternative meets current City standards for concurrency. Only then - after the City has developed an appropriate No Action Alternative that establishes that how traffic congestion along SR-527 and SR-524 will be adequately mitigated consistent with the City’s existing Subarea Plan and adopted LOS standards - should the City begin to consider additional density via an update to the Subarea Plan.</p> | <p>Transportation concurrency is met today. The adopted 2035 Comprehensive Plan considers long-term growth in the City and shows the City meeting concurrency standards in year 2035. The current Comprehensive Plan’s transportation element modelled the growth forecast for the area at the time. Growth has occurred more quickly in the subarea, and anticipated employment growth levels in the Comprehensive Plan for this area were met by 2018, with additional housing in the pipeline. The project team developed a No Action Alternative that better reflects the recent growth trends within the study area that are within the allowed zoned-capacity; the modeling of No Action was completed for a horizon year after 2035 to match the modeling of the Action Alternatives (carried out to 2043/44). The subarea plan includes proposed Comprehensive Plan amendments to reflect these updated growth assumptions.</p> <p>The mitigation package of transportation improvement projects for the Preferred Alternative could apply to the No Action Alternative, and would result in LOS results that are as good or better than what was reported for the Preferred Alternative in the Draft EIS.</p> |
| 12c | <p>2. <b>Demonstrate Environmental Feasibility of Transportation Mitigation Projects</b></p> <p>To maintain a LOS-E for the SR-527 corridor, the Preferred Alternative relies on four mitigation projects per Figure 6 of the Addendum to the Draft PAEIS dated July 9, 2020. Two of these mitigation projects – the 20th Avenue SE Extension (Project M-2) and the 214th Street SE Roadway Extension (Project M-3) – are expected to result in significant wetland impacts. These impacts have not been analyzed or quantified in the Subarea Plan EIS. However, the</p>  | <p>An appropriate level of environmental analysis was conducted based on proposed plan and mitigation projects to demonstrate feasibility. Once projects are designed, more detailed analysis will be done based on the regulatory requirement at that time.</p>   |

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|     | <p>impacts are considered sufficiently significant such that City staff has proposed amending the City’s critical area regulations mitigation sequencing standards to allow greater flexibility for off-site mitigation.</p> <p>Without an analysis of the potential wetland impacts and mitigation options, it is unknown whether Projects M-2 and M-3 can be permitted under local, state, and federal regulations. Because the Preferred Alternative relies so heavily on these two mitigation projects to meet concurrency standards for the SR-527 corridor, analysis of impacts should be included in the Subarea Plan EIS to determine if construction is feasible. The time to determine whether these projects are feasible cannot be deferred.</p> <p>We have similar concerns regarding the viability of the other two proposed transportation projects. To date, no cost information or feasibility analysis has been provided. By the City’s own analysis, for the proposed Subarea Plan to meet concurrency standards, these projects must be constructed concurrent with the development proposed by the Subarea Plan. We do not have reason to believe this plan is actually viable.</p>   | <p>See response to comment 12b</p>   |
| 12d | <p>3. The City Should Support Transportation Improvements and Policies that Improve, Not Create, Traffic Congestion</p> <p>The Owners’ Association is significantly concerned with the “strong support” expressed in the draft Subarea Plan to convert two general purpose lanes on SR-527 to restricted Business Access and Transit (BAT) lanes, further exacerbating traffic congestion. The DEIS Addendum does not include BAT lanes in the traffic modeling but concludes that future changes to the City’s concurrency policies would be needed to reduce the acceptable LOS for the SR-527 corridor from LOS-E to LOS-F to allow BAT lanes. In other words, the City is expressing “strong support” for a transportation approach that has not been analyzed and actually plans to fail.</p> <p>The City should instead focus on traffic improvements that more effectively distribute traffic exiting I-405, specifically by partnering with WSDOT to construct a south-bound ETL that funnels traffic directly to 228th Street, bypassing both the CPBC and the SR-527 corridor. Our transportation engineer has identified this could significantly improve road capacity on SR-527 leading from I-405. At a very minimum, this alternative should be analyzed and the City should encourage WSDOT to complete a southbound ETL extension within the planning horizon set forth in the Subarea Plan. Without a southbound ETL, the WSDOT’s ETL project will redistribute I-405 traffic on SR-527 in a way that degrades, rather than improves, existing and future LOS for the SR-527 corridor.</p> | <p>The BAT lanes are not proposed in the draft plan’s mitigation package, but the City continues to explore ways to support non-SOV travel.</p> <p>A new southbound I-405 ETL onramp from 228th Street SE is part of the I-405 Master Plan along with express toll lanes between SR 527 and I-5, but not likely to be constructed within the 2043 horizon year of this plan. Therefore, this project was not included in the alternatives evaluated. The City continues to support this project.</p> |

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|     | <p>Equally concerning is the City’s signal that it is actively contemplating a strategy to modify its concurrency standard to accept failing LOS for the SR-527 and SR-524 corridors. The draft Subarea Plan specifically proposes to rely on that potential future policy change as an end-run around the current concurrency standards. Using speculative changes to the City’s comprehensive planning policies as a mitigation strategy is untenable under the GMA, and even more alarming under SEPA given that the City intends to adopt a Planned Action Ordinance coextensively with this Subarea Plan. Most importantly, it does nothing to actually solve the transportation quagmire facing the Subarea; it simply accepts failure.</p>  | <p>Modification of the existing concurrency standard is not part of the preferred alternative since the proposed plan meets the required corridor LOS. However, consideration is a possibility in the future and would not be precedent-setting in the Puget Sound region.</p>   |
| 12e | <p>4. Demonstrate Effectiveness of Alternative Transportation Solutions Before Relying on Them</p> <p>The draft Subarea Plan relies heavily on single occupancy vehicle (SOV) alternative transportation strategies, abandoning any effort to improve capacity to address anticipated traffic congestion. The Owners’ Association agrees that transportation demand management (TDM) strategies may be one of the tools in the traffic congestion toolkit for the Canyon Park Subarea. However, the City must be able to demonstrate that TDM and increased transit strategies, proposed as part of their Preferred Action, will indeed “move people” in a significant enough manner to replace the need for traditional capacity improvements to serve transportation demands. To date, the City has not provided any evidence (e.g., examples from other areas similar to the Canyon Park Subarea) where these strategies have worked as contemplated in the Preferred Alternative.</p> <p>As described below in our supplemental SEPA comments, we are skeptical that the purported 14% reduction in trips resulting from TDM implementation is accurate in light of the proposed mixed-use development. The ITE Trip Generation Manual, used to predict traffic volumes for various types of land uses, already factors in that dense mixed-use development will include the types of TDM programs contemplated in the Preferred Alternative. Thus, the City’s analysis effectively attempts to “double count” the potential traffic reduction of TDM measures – as they are both baked into the trip generation and layered on as additional reduction measures.</p> <p>Further, the Comprehensive Plan currently contains numerous goals, policies and actions regarding transit, TDM, and Transportation System Management (TSM). These have not prevented the SR-527 and SR-524 corridors degrading from LOS-E in 2035 under the existing Comprehensive Plan to LOS-F in 2043 under the No Action Alternative. Relying so extensively on these same goals, policies and actions to provide substantial mitigation for traffic growth under the Preferred Alternative seems to be based on hope, rather than an implementable strategy.</p> | <p>A TDM memo shared with VNF on 8/13/2020 outlined the assumptions for the travel demand strategies in the Draft EIS analysis. The attachment included references to studies that supported the effectiveness of the strategies considered, with observations at sites in Seattle, San Francisco, Los Angeles, and Washington D.C., among others.</p> <p>The City chose a moderate TDM package of the three options considered for the project, and the trip reduction applied to the subarea was at the lower end of the range of effectiveness for a more conservative approach in this environmental analysis.</p> <p>The travel demand management (TDM) reductions applied on top of the trip generation for mixed-use developments is not duplicative. The mixed-use reductions account for internalized trips, which are fewer vehicle trips because of site characteristics like diverse land uses in close proximity. This could be a person living in Canyon Park and eating dinner at a restaurant nearby without having to drive.</p> <p>TDM strategies, such as charging for parking and subsidized transit passes, are meant to reduce external vehicle trips. This encourages reduced vehicle trips by shifting people’s modes before they arrive to the subarea.</p> |

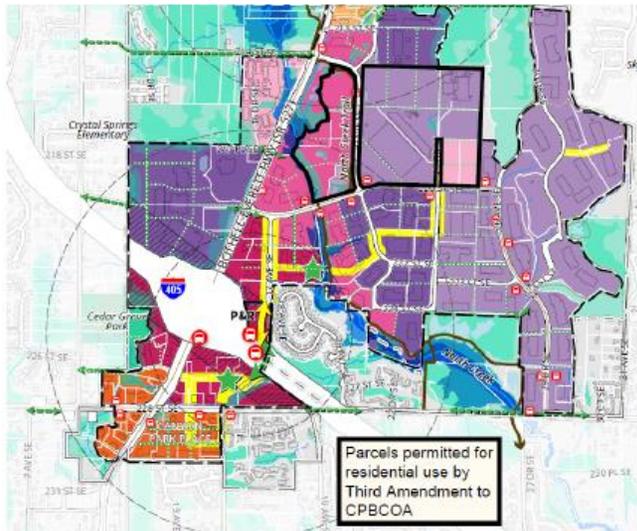
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| 12f | <p><b>5. Measure Cumulative Traffic Impacts from Subarea Plan, WSDOT, and ST Projects</b></p> <p>In conjunction with adequately addressing concurrency as outlined above, the City must analyze the cumulative impacts of growth within the Subarea combined with traffic growth from the WSDOT ETL project and the planned ST Bus Base North. Both are reasonably foreseeable projects with environmental review already underway.<sup>3</sup> Moreover, a Subarea Plan that fails to consider the direct impacts of these major transportation projects on the CPBC exacerbates the Owners' Association's concerns regarding the lack of adequate planning for traffic infrastructure and capital facilities to mitigate a plan for increased land use intensity.</p> <p>According to the draft Environmental Assessment (EA), the WSDOT ETL project is anticipated to result in failing intersections within the internal CPBC road network, as well as the SR-527/220th St SE and 17th Ave SE/220th Street SE intersections, which will become part of the City's public road system. As addressed below in our supplemental SEPA comments, the WSDOT EA overstates the growth assumptions for the "No Build" Alternative and establishes an artificially high growth baseline against which the "Build" Alternative is compared. This artificially high growth baseline results in the EA underestimating the impacts of the Action Alternative and not fully evaluating or mitigating impacts of the ETL Project. In turn, this results in insufficient capacity of critical components necessary to support the Project, including the intersections of 17th Avenue SE/220th Street SE and 220th Avenue SE/SR527, both of which are located at the primary entrance to the Park.</p> <p>According to the Determination of Non-significance (DNS) recently issued by ST for the Bus Base North project, ST anticipates storage for 120 buses, the majority of which are articulated. The Bus Base North is projected to generate 878 daily trips onto the surrounding private and public road system, which will further exacerbate inadequate LOS and queuing at the 220th St SE/20th Ave, 220th St SE/17th Ave, and 220th St SE/SR-527 intersections. The City's DEIS and Addendum do not mention, much less analyze, the impacts of this project in conjunction with the City's proposed Subarea changes.</p> <p>The Owners' Association further <b>requests that</b>, in conjunction with evaluating the cumulative impacts of the WSDOT and ST projects, <b>the City require WSDOT and ST to mitigate their impacts on the road network both within and outside of the Park.</b> Both projects require land use and construction permits from the City. As with any other development, these agencies should be responsible for capacity improvements made necessary by the increased congestion caused by their projects. Additionally, the <b>City should require that WSDOT and ST fully address and mitigate the impacts to the private road surfacing and subgrade resulting from</b></p> | See response to comment 3b, 3c, 3d and 5a. |
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|            | <p>high volumes of heavy bus traffic and passenger vehicles introduced onto the internal road network.</p>  | <p>No permit applications have been submitted to the City in order to evaluate impacts or the City's ability to require mitigation.</p>   |
| <p>12g</p> | <p><b>6. Identify How Subarea Plan Will Be Accomplished in Private Business Park with Private Road Network</b></p> <p>For the past several years, the CPBCOA has sought to work with the City to enable dedication of the private road network in the Park to the City. Following the City's prompting to permit residential uses in the CPBC as part of the 2015 Subarea Plan update, the Owners' Association explained to City staff that it would be necessary for the roads to become public to support residential use (in particular, to ensure adequate police presence), and began working with the City on a plan to transition the spine roads to the City. Thereafter, with the dawning of the WSDOT ETL and the ST Bus Base projects, our proposal was that the City and the Owners' Association work together to ensure that WSDOT and ST fully mitigate the effects of their projects on transportation capacity and road conditions in the Park. Then, with some additional upgrades funded by the Owners' Association, the City would accept dedication of the spine roads and make further improvements needed to support the additional land use intensity in the Park that the City was contemplating in the Subarea Plan. So far, the City has rejected our efforts to collaborate around the impacts of WSDOT's ETL and ST's Bus Base projects, and discussion of dedication have been coupled with unreasonable conditions.</p> <p>At this point, the City has no plan to accept dedication of any of the private internal street network without significant capital investment by the Owners' Association. The City's position is that the Owners' Association must improve the internal streets up to a public street standard before dedication will be considered. These improvements are estimated to exceed \$3 million. This cost does not benefit the Owners' Association given that the current roadway is appropriately maintained for the scale of development originally envisioned for the Park.</p> <p>(Notably, three years ago, the City and Owners' Association had identified a much more reasonable set of improvements that the CPBCOA would make to improve the roads to enable dedication, and the CPBCOA had set aside significant funds to make those improvements in the last few years. In recent negotiations, the City has continued to layer on additional requirements until the cost simply became too high.)</p> <p>If the roads remain private, the Owners' Association will have to monitor traffic impacts to the private road network when reviewing all requests for new development and redevelopment within the Park. This will have the effect of limiting land use intensity to the existing road capacity, which is well below the intensities proposed by the Subarea Plan. The</p> | <p>The subarea plan update has been an opportunity to renew discussions about future ownership of the "spine roads," it is not the means for the city to accept ownership but it is necessary to plan for future growth regardless of ownership of the internal roadways.</p> |

improvements necessary to implement the pedestrian and bicycle vision of the Preferred Alternative will not be made if the roads remain private. This will have the effect of reducing the assumed levels of transit ridership and internal trip capture, invalidating the reductions to trip generation in the traffic analysis of the Preferred Alternative.

Further, it is important that the City acknowledge that residential uses remain prohibited in the Park, with the exception of a limited number of parcels, per Section 7.1 of the Third Amendment to the Amended and Restated Declaration of Codes, Conditions and Restrictions for Canyon Park Business Center (CC&Rs) (Recording No. 201807050389). As shown below in areas shaded magenta and pink, the Subarea Plan proposes a significant amount of mixed use development within the Park in areas where the CC&Rs prohibit residential use. Correspondingly, the Subarea Plan prohibits residential in the areas shaded purple, which comprises the majority of parcels where the CC&Rs actually permit residential use. The result is a Subarea Plan that is not implementable and will not be able to meet the required number of activity units to maintain certification as a Regional Growth Center. This issue is not disclosed or discussed in the Subarea Plan or DEIS/Addendum, and no policies or actions are proposed to address it.

See response to comment 3g.



This outcome is particularly frustrating to the Owners' Association as we only elected to change the CC&Rs three years ago to enable residential at the behest of the City. At that time, we understood that change to be part of a joint plan with the City that would support

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|     | dedication of the private road network and the provision of police services in the Park. As noted above, this has not yet played out as originally discussed or anticipated.   |  |
| 12h | <p><b>7. Demonstrate Economic Viability of the Preferred Alternative</b></p> <p>As identified in our prior comment letter, the market and proforma analysis show that only mixed use residential/commercial redevelopment is economically feasible. As noted above, however, residential development is not allowed under the Canyon Center Business Park CC&amp;Rs in the majority of those areas identified in the Subarea Plan. Consequently, the only economically viable option is not currently legally viable.</p> <p>Furthermore, we are skeptical that the scale and type of development identified under the Preferred Alternative is attainable. Given the likely competition between Regional Growth Centers for available transportation funding, the City has not explained how Canyon Park will be able to capture such a significant share of that growth – particularly with its known transportation issues. Also, the draft Subarea Plan is unclear as to how the City intends to keep the Park both a biotech incubator hub and a mixed used residential/commercial neighborhood where the same people live and work. This would be a major shift for the CPBC, and the <b>Subarea Plan does not explain how these multiple goals will be achieved.</b></p>  | <p>See response to 3e. The market study poses several scenarios for employment growth based on trend and regional growth strategies (Vision 2040 and Vision 2050). The Preferred Alternative is conservative in that it more closely matches the “low” projection. (Market Study Figure 11, pages 22-24).</p> <p>The scenarios considered the City’s share of growth in regional plans as well as trends.</p> <p>The Subarea Plan identifies primarily employment uses in the areas east of 20th Ave SE and west of Bothell-Everett Highway. This is consistent with the market study suggesting the subarea should be managed to ensure that residential and mixed-use redevelopment does not outcompete commercial projects in the short term.</p> |
| 12i | <p><b>8. Substantiate the Benefit of the Regional Growth Center Designation</b></p> <p>The Owners’ Association acknowledges the City’s desire to maintain the existing designation of Canyon Park as a Regional Growth Center (RGC) and the necessity to adopt a Subarea Plan compliant with the Puget Sound Regional Council’s requirements to maintain that status. The Canyon Park Subarea has been designated as an RGC since 1995, and yet land use intensity and redevelopment activity envisioned under the prior Subarea Plan has failed to materialize. Moreover, the benefits arising from that RGC designation remains elusive to businesses and property owners in and around the Subarea. We understand the City’s current position to be that it needs to maintain the RGC to compete for transportation funding to improve traffic conditions in the Subarea. In the decades since this area was first designated an RGC, we are unaware of what transportation funding or improvements, if any, the City secured to improve the transportation system in this area. The DEIS and Addendum transportation analyses suggest that conditions have only been getting progressively worse over the last ten years. Consequently, we are skeptical that the City’s stated desire to retain the RGC designation to support future transportation improvements will materialize into any actual improvements that reduce congestion.</p> | <p>See response to comments 3a, 3e, 11a and 11d. Within the subarea the area has grown and there has been permit activity and investment by business and property owners. The regional growth center supports the long term vitality of the subarea and this part of the region by preserving employment areas for economic growth, creating close, livable neighborhoods for employees, increasing transit service, and planning for growth.</p>  |

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|     | <p>So far, the City has not identified any funding sources for the road improvements proposed as part of its Preferred Alternative. We are worried that implementation of those improvements is predicated on the City receiving grant funds from the Puget Sound Regional Council based on the RGC designation. This seems to be an untenable do-loop, where the City's ability to retain the RGC is predicated on transportation improvements that are only possible if the City retains the designation and thereafter wins grant funds to enable those improvements.</p> <p>The Owners' Association would like to know how the City anticipates the RGC designation will benefit current and future businesses, property owners, and residents. Has the City identified transportation funding arising from that designation, and if so, how is the City planning to be competitive for those funds among the other 28 RGCs? Does transportation funding tied to the RGC designation influence whether traffic improvements contemplated within the Subarea Plan will be completed? What does the Preferred Alternative change from the existing Subarea Plan to result in a feasible and implementable RGC in Canyon Park, when such result has eluded the City for the last 25 years? The Subarea materials provided to date do not answer any of these questions.</p>  | <p>Potential funding sources are identified in the plan and Planned Action Ordinance.</p> <p>See response to comments 3a, 11a, and 11b.</p>   |
| 12j | <p>Supplemental SEPA Comments</p> <p>The Owners' Association previously provided comment on the DEIS for the Subarea Plan; however, the City subsequently released an Addendum evaluating impacts of the Preferred Alternative and related traffic memoranda – including evaluation of impacts on the internal Canyon Park road network. The Owners' Association offers these additional comments concerning the City's environmental review of the Subarea Plan, supported by the technical comments in the attached memorandum from TENW.</p> <ul style="list-style-type: none"> <li>Anticipated baseline traffic growth within the CPBC is based on flawed assumptions contained in the draft EA for the WSDOT ETL Project. As indicated in a letter we submitted to staff earlier this summer, the EA for the WSDOT ETL uses an aggregate regional growth rate of more than 40% applied to the internal private intersections in the CPBC. Instead, the growth rate should have been based on a specific land use analysis to project future growth within the CPBC based on the existing City Comprehensive Plan and zoning designations, as well as the existing development conditions and constraints. Reliance on WSDOT's assumptions results in a significantly higher "No Build" baseline condition against which the "Build" alternative is then compared. The result is that the impacts of the "Build" alternative are muted and proportionately less than they would be under a "No Build" alternative that used valid land use assumptions to project future traffic growth.</li> <li>The trip generation methodology for the Preferred Alternative inappropriately relies on a high internal capture rate inconsistent with the existing built environment for the CPBC, resulting in artificially lower anticipated trips. Specifically, the trip generation methodology</li> </ul> | <p>The typical ITE trip generation rates have been over 40 percent higher than observed counts at mixed-use sites. For this analysis, Fehr &amp; Peers applied its MXD+ tool to estimate trip generation. This tool</p> |

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|     | <p>assumes existing and new development will be connected by a convenient, walkable, bicycle oriented, transit supportive environment in a dense framework. However, the entire business park community is currently a closed system with limited mixed use and no connectivity or proximity to those other land uses on the fringe (retail and housing). While pockets of mixed use can be implemented in the future, this methodology cannot be applied to an area that is over a mile wide and 1.5 miles in length with limited connectivity except the SR 527 corridor and the CPBC private road system. As an example, all existing retail within the primary Canyon Park zone is at Thrasher's Corner, but the City's traffic analysis of the Preferred Alternative has reduced all trips to existing/future retail by 35 percent given an assumed proximity between all these jobs in Canyon Park and Thrasher's corner. Use of this high internal capture rate is inconsistent with ITE guidance. As such, adjustments should be made to account for higher utilization of SR-527 between all of these land uses, which causes the corridor to likely fail LOS.</p> <p>As discussed above, the purported 14% trip reduction resulting from TDM programs relies on duplicative counts to demonstrate effectiveness. Implementation of parking pricing policies, shared parking, transit subsidies, commute trip reduction programs and other measures are already included in trip generation rates for dense mixed-use developments. Accordingly, these strategies, have been accounted for to a large extent in ITE rates applied to the modeling. <b>As such, the 14% reduction is likely to be entirely or significantly duplicative.</b></p> | <p>has been validated at 27 mixed-use sites around the country, including conventional suburban freeway-oriented mixed-use sites. The results of this validation found that the MXD+ tool results in a 4 percent overestimate of trip generation at mixed-use sites.</p> <p>The MXD+ methodology, when applied to the study area, resulted in a 20 percent reduction in estimated trip generation for the mixed-use site compared to what would have been predicted by ITE. The additional 14 percent reduction is a result of TDM strategies assumed for the area, not primarily because of mixed-use development.</p> <p>The Preferred Alternative includes zoning changes to allow for retail in more areas than just at Thrasher's Corner. The trip generation is for a future scenario at full-build out, not today's conditions.</p> <p>See response to comment 12e.</p> |
| 12k | <p>Additional Analysis and Meaningful Dialogue with the Canyon Park Community is Necessary Before the Planning Commission Proceeds with a Recommendation</p> <p>Both the Owners' Association and broader Canyon Park community have consistently communicated to the City that the proposed Subarea Plan does not address the most apparent and pressing problem from this area: traffic congestion from existing growth within the SR-527, SR-524, and 228th Street corridors. Comments raised at recent open houses hosted by the City and results of the August survey demonstrate that adequate transportation infrastructure – particularly an internal road network that has adequate capacity to support movement of cars and people throughout the Subarea - remains the top concern. <b>Yet, the current Subarea Plan indicates that the City has simultaneously given up on identifying solutions for currently projected traffic congestion and doubled down on growth by planning for more intense utilization of land within the Canyon Park Subarea.</b></p> <p>We acknowledge and appreciate that the City has been working on this Subarea Plan for a number of years. Indeed, we have been attempting to work alongside you. Unfortunately, our most recent request for a joint study session with the Planning Commission was rejected.</p>  | <p>The subarea plan has identified a mitigation package to meet the city's SR 527, SR 524, and 228th Street concurrency corridor standards.</p>  |

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|           | We continue to be very interested in working with the City to develop a feasible and implementable Subarea Plan update. We are not there yet but welcome the opportunity to engage further with the City to get there.   |  |
| <b>13</b> | <b>Exhibit 13 Roger Belanich, 9/1/2020</b>   |  |
| 13a       | Life Science Center/Offices:<br>This has been a target since the inception of Canyon Park Business Center and the CPBC has had the most concentration of Life Sciences in the Metropolitan Area in addition to South Lake Union. This category of use should not be compromised for Mixed Use on the only remaining undeveloped property in CPBC. That is the TIAA property between 20th Ave SE and the Bothell-Everett Highway. The integrity of CPBC requires business use of the property as the demand of High Tech, Offices, and Life Sciences advance to Bothell from Seattle and Bellevue. A mixed use residential is not reasonable. Nor is the height of building to be restricted at 60 feet. After all, it should be considered that the formally approved development of TIAA property allowed 100 feet height and 630,000 sq. ft. of offices. | The TIAA property is proposed for Office/Residential – Medium (O/R-M) which allows, but does not require residential. The current R-AC zone allows 100 feet in height for non-residential uses. The proposed code establishes a minimum base height of 65 feet (i.e. allowed outright) with the ability to achieve 85 feet in height under a bonus system. See response to comment 1a. |
| 13b       | Storm Water:<br>Storm water that will be required for future redevelopment of Canyon Park Business Center must recognize and be accommodated by the open 10 acre Detention Pond located in the southern area of the Park as well as the existing storm water system that is in place now.<br><br>There is an inconsistency in the Comp Plan that does not identify the Storm Water Manual that will be adopted in January 1, 2022. Since the Comp Plan has advocated a minimum FAR, as well as the more intensive use in the future redevelopment of CPBC, storm water must be reconciled with the proposed Subarea Plan of CPBC.  | The Planned Action Ordinance addresses use of a regional system or meeting higher standards on a site. The regulations in effect at the time would be applied (in Exhibit B-2 of the Planned Action Ordinance). The new manual would apply when Bothell adopts it.   |
| 13c       | Transportation:<br>The Subarea Comp Plan has grossly misrepresented the traffic impacts of that Plan. The Plan has not reconciled the impacts of the Plan itself as to the projected use, particularly for the future redevelopment of CPBC which is inevitable. Furthermore, it has not reconciled the Plan to the impact of the DOT's proposed and adopted offramp on I-405 that will enter Canyon Park on 17th Ave SE. Nor has the Plan reconciled the impacts of the Sound Transit Bus Facility. The Plan must respond to these matters.   | See response to comment 3b, 3c, 3d, and 11b.   |
| 13d       | Density Adjacent to the I-405 Interchange:<br>It certainly makes sense and I endorse having the density of offices and residential at MUH adjacent to the off ramps on both sides of I-405 and Bothell-Everett Highway. And as well as the new off ramp at I-405 and 17th Ave SE, and adjacent to the Park-n-Ride and potentially a Light Rail Station in the future.  | Comment noted.   |
| 13e       | 20th Avenue Extension to Maltby Road:  | Comment noted.   |

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|           | <p><b>This extension should be included in the Subarea Plan.</b> In the past 5-10 years it was shown as a recommendation of the Six Year Plan. It is the only possible outlet for Canyon Park and would eliminate congestion at 214th Street and Bothell-Everett Highway as well as the intersection of Thrasher’s Corner. <b>At least it should be on the Plan and subject to funding and mitigation by CPBC.</b></p>  |                             |
| 13f       | <p><b>Parks and Trails:</b><br/>The survey results emphasizes the need for parks, trails, and gathering areas. The recent revised Comp Plan does not give consideration to an earlier draft of the Plan that showed the area along 31st Ave SE and between the Business Park (and T-Mobile Buildings) as a potential park. These 17 acres are privately owned and not formally included within CPBC. Most of the property is upland and only a quarter of the 17 acres is a wetland which has been misconstrued in the Plan.</p> <p>These 17 acres are a beautiful area. It is now used by the neighborhood east of 31st Ave SE and by the business park employees even though not a formal part of those communities. There would be a pedestrian entry from 31st Ave for entry into the CPBC as well as for bike trails. Both would connect through the CPBC to the Century Trail which is within the Business Park. This use would fulfill the response of the Subarea Plan, as well as the opinion of the neighborhood and the Business Park employees for parks, gathering places and trails as demonstrated in the “Survey Results”.</p> <p>This use as a <b>park has been formally endorsed by a Resolution of the Canyon Park Business Center Owners’ Association and the CP Board. And should be at least shown on the Comp Plan to accommodate its’ future consideration</b> and possible adoption by the City in expectation of the property being dedicated to the City by the owner.</p> | See response to comment 1c. |
| <b>14</b> | <b>Exhibit 14 – see Exhibit 13</b>  |                             |
| <b>15</b> | <b>Exhibit 15 – David Levitan, 9/2/2020</b>   |                             |
| 15a       | <p>Thank you for your efforts to prepare a comprehensive plan for Canyon Park. As a Bothell resident, I would like to express both excitement about the proposed changes, but also deep concerns I have with the transportation section.</p> <p>The draft acknowledges that substantial improvements to the transportation network must be done. But, the plan also states that the "transportation approach relies heavily on the foundational principle that Bothell cannot build its way out of congestion."</p> <p>Yet despite the plan's statement that non-car transportation must be a priority, the amount of resources dedicated to understanding and improving non-car transportation is minimal. For</p>   |                             |

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|           | <p>example, in the July 22nd agenda, there is a 100 page report and traffic analysis. The report, called the "AM and Internal Street Transportation Analysis" starts by stating that the "transportation chapter is focusing on potential impacts to auto/freight, transit, and people walking and biking." Afterwards, the words <b>bike or bicycling only appear in complicated tables (that have no explanation) or to state that adding a bike lane would increase car capacity over the design limits.</b> Is this a "transportation analysis" or a "car volume analysis"?</p>   | <p>The report referenced provided additional technical traffic analysis for the subarea that focused more heavily on vehicle operations in the subarea.</p> <p>The draft subarea plan includes the proposed improvements for people walking and biking, including a pedestrian network and bicycle network that highlights high priority bicycle projects.</p> |
| <b>16</b> | <b>Exhibit 16 Ann Aagaard; 9/10/2020</b>  |  |
| 16a       | <p>RE: Canyon Park SubArea Plan, Planned Action Exhibit B-2 Mitigation Document and SubArea Plan RE: Connectivity 214th St. SE extension<br/> My comments refer to the above two sections of the Canyon Park Subarea Plan.</p> <p>1. Exhibit B-2 Mitigation Document<br/> Page: 25 of Sept. 2 P.C. packet Page 166 of 209<br/> Natural Environment: This section reads as follows:<br/> "The City shall review planned actions for consistency with Bothell critical area regulations in place at the time of application. Until such time as the City's regulations are amended, the City may condition development to be consistent with wetland buffers widths and wetland compensatory mitigation recommendations contained within the latest guidance and Best Available Science including the following documents, as amended:<br/> - Wetland guidance for CAO Updates ( Department of Ecology, 2016 and 2018)<br/> - Wetland Mitigation in Washington State Part 2: Developing Mitigation Plans (Department of Ecology, 2006.</p> <p>and in section several paragraphs down is this statement:<br/> - "The City may implement ecological mitigation opportunities in Exhibit B-3 for public improvements as advanced mitigation program to offset unavoidable impacts to wetland and stream critical areas in accordance with Interagency Regulatory Guide: Advance Permittee-Responsible Mitigation ( U.S. Army Corps of Engineers, et al.,2012</p> <p>The current BMC14. CAO code document MUST FIRST BE AMENDED. The language as proposed CANNOT be implemented by including these references in the Canyon Park Planned Action Ordinance. The City may condition development to be consistent with wetland buffers widths and wetland compensatory mitigation contained with the latest guidance and Best Available Science included in these referenced documents if the buffer widths (and wetland compensatory mitigation recommendations) have actually been ADOPTED by the City of Bothell.</p> | <p>See response to comment 4.</p>  |

And regarding the advanced mitigation, the City must adopt a policy regarding such implementation.

Language in the current BMC / CAO clearly states that only the current CAO can be considered in applications.

**BMC 14.04.110**

A. The provisions of this chapter shall apply to all lands, all land uses and development activity, and all structures and facilities in the city, whether or not a permit or authorization is required, and shall apply to every person, firm, partnership, corporation, group, governmental agency, or other entity that owns, leases, or administers land within the city. No person, company, agency, or applicant shall alter a critical area or buffer except as consistent with the purposes and requirements of this chapter.

B. The city shall not approve any permit or otherwise issue any authorization to alter the condition of any land, water, or vegetation, or to construct or alter any structure or improvement in, over, or on a critical area or associated buffer, without first ensuring compliance with the requirements of this chapter, including, but not limited to, the following:

I strongly suggest that the Planning Commission make a recommendation to the City Council to change the language in the Natural Environment section of Exhibit B-2: Mitigation Document to state the following:

"The City shall review planned actions for consistency with Bothell critical area regulations in place at the time of application. The City shall adopt, prior to adoption of the Canyon Park SubArea Plan: *Washington State Wetland Rating System for Western Washington: 2014 Update ( Ecology Publication #14-06--29, or as revised and approved by Ecology) "*

The reference to the above wetland rating buffers document is referenced in the *Wetland Guidance for CAO Updates( 2016-2018)*. The 2014 publication makes it clear these are for western Washington.

I have included this reference as a separate publication for the convenient application as an amendment to the CAO buffers in the current Bothell code. This Wetland Rating System has been adopted by City of Kenmore and City of Kirkland.

RE: the section regarding advanced mitigation program to offset unavoidable impacts to wetland and stream critical areas. I cannot access the 2012 document that is referenced. The

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|           | <p>Corps guidance is updated periodically, and the document is listed, but I could not access this 2012 update for review.</p> <p>Please provide the full document in Exhibit 2 .or find another reference for the <i>Interagency Regulatory Guide: Advance Permittee-Responsible Mitigation (U.S. Army Corps of Engineers, et al.,2012</i></p>   |  |
| 16b       | <p><i>Improve connectivity and relieve stress on major corridors and three entry points. <b>Page 102</b></i><br/> <i>Canyon</i><br/> <i>Park Subarea Plan</i><br/> <i>Option 1(preferred) Extend 214th St. SE westward to 9th Ave. SE.</i><br/> <b>Option 2. Extend a trail westward from the existing 214th St. Se to 9th Ave. SE.</b><br/> <b>Please recommend to Council that Option 2 ( extend trail westward) be designated as the Preferred Option 1.</b></p> <p>214th S.E. the associated wetlands on the north and south are Class I wetlands, associated with North Creek. The Shoreline designation (200' from ordinary high water mark) for North Creek north of 214th is <b>Natural</b>. It is not consistent with the shoreline designation or the wetland classification to recommend that a street be constructed that would impact the Class I wetlands and this fish bearing stream designated Natural.</p>                        | Comment noted.   |
| <b>17</b> | <b>Exhibit 17 – McCullough Hill Leary representing Juno Therapeutics; 9/9/2020</b>  |  |
| 17a       | <p>We represent Juno Therapeutics (“Juno”), a Bristol Meyers Squib Company with an existing campus located at 1522 217th Place in the Canyon Park neighborhood of Bothell (“City”).</p> <p><b>Juno generally supports the City’s Canyon Park Subarea planning efforts, but it is concerned about potential impacts that the rapid adoption of the new development regulations may have on its campus expansion plans.</b></p>   | Comment noted.   |
| 17b       | <p>For the past several years, Juno has been working with a team of consultants to evaluate the feasibility of adding a new building to its existing campus. Juno plans to develop approximately 65,000 sf. of additional office facility with associated parking on its campus (“Project”). This facilities planning was undertaken after years of due diligence and thoughtful consideration of site constraints, design considerations, and the currently applicable Bothell Municipal Code (“BMC” or “Code”) requirements and development standards. Juno has scheduled a pre-application meeting with the City about the Proposal on September 10, 2020. Juno intends to start the Project permitting as soon as possible.</p> <p>Juno has been monitoring the City’s Canyon Park Subarea planning efforts, but just received the draft development standards released on August 27, 2020 (“Code Update”) with substantive zoning details.</p> | <p>BMC 11.04.011 provided a similar provision for projects that were in design but not yet vested prior to the effective date of the downtown subarea plan and regulations. Staff is evaluating the implications of including a similar provision for projects in the Canyon Park subarea.</p> |

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|           | Based on our initial review, the Code Update does not anticipate reasonable transitions for development like the Project, which were initiated under the current Code. To address this concern, we are requesting that the final version of the Code Update include vesting protections for owners who have completed the City's pre-application process. This will provide predictability for Bothell property owners who have invested significant resources in planning and designing improvements to their properties in reliance of the current Code.  | <b>COMMISSION FEEDBACK:</b><br>Staff recommends evaluating the implications of including a vesting provision in the development regulations and Planned Action Ordinance with very limited application.   |
| 17c       | Our preliminary review of the draft Code Update regulations in BMC 12.48 has identified potential impacts to Juno's proposed Project, including but not limited to the minimum floor area ratio ("FAR") requirements which may impact the design and fiscal feasibility. We are also concerned about impacts associated with policy determinations the Planning Commission and City Council have not yet made, including affordable housing requirements, solar requirements, and maximum parking restrictions.   | Code amendments proposed in December 2019 would have established minimum FAR and density requirements for R-AC zones in Canyon Park and North Creek. Those amendments are on hold pending an appeal.<br><br>There were provisions that exempted existing development from meeting the minimum requirement when increasing the size of a building.<br><br><b>COMMISSION FEEDBACK:</b><br>Staff recommends including a similar exemption for building additions and evaluating the potential extension of the exemption for new buildings on a developed site provided the overall FAR of the site is increased. This would not apply to redevelopment of an entire site. |
| 17d       | In order to mitigate these impacts, we request that the City add a provision to the Code Update that extends vesting protections beyond the provisions in BMC 11.04.010.A to qualified projects that are: (1) within the boundaries of the Canyon Park Subarea; and (2) have completed the City's pre-application process prior to the effective date of the Code Update so long as that applicant submits a complete Type I, II, or III application within nine months of the effective date of the Code Update.<br><br>This safe harbor provision will allow property owners to continue to invest in planning efforts without fear that the new regulations will render its planned improvements infeasible. You'll recall that the City adopted a similar provision to provide for a graceful transition with the Downtown code update. | See response to comment 17b   |
| <b>18</b> | <b>Exhibit 18 – Gary Yao, Sound Transit; 9/14/2020</b>  |   |
| 18a       | As Sound Transit continues to work with the City of Bothell and other local jurisdictions on our bus rapid transit (BRT) program, we commend the efforts undertaken to update the Canyon  | Comment noted.  |

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|     | <p>Park Subarea Plan to support a thriving Puget Sound Regional Council (PSRC) Regional Growth Center that takes advantage of access to frequent and reliable transit.</p> <p>Such transit services include the existing Community Transit Swift Green Line and planned Sound Transit Stride BRT service. The new Stride service will connect Bothell and Canyon Park with other regional destinations and transportation facilities, including regional light rail. Essential to the operations and maintenance of Stride service is the Bus Base North (BBN) facility proposed in Canyon Park. BBN would be a bus operations and maintenance facility, programmed and sized to maintain, fuel, wash, and store up to 120 buses of the Stride and other bus fleet.</p> <p>The draft Canyon Park Subarea Plan and development regulations that have been advanced by City staff for your consideration are anticipated to apply to BBN, which Sound Transit proposes to locate on an approximately 12.5-acre vacant parcel on the east side of 20th Avenue Southeast, just south of 214th Street Southeast.</p> <p>The adoption of the proposed development regulations is important in that it provides the local regulatory context for the next phase of BBN project development, which will include refinements to the existing 10% design and project requirements. In order to better understand the City’s vision for Canyon Park, how our projects can support the vision, and the potential implications for project design, Sound Transit staff have tracked the development of the subarea plan and have participated in initial discussions with City staff on the draft plan.</p> <p>Following review of the draft Canyon Park development regulations released on August 28th and Planning Commission discussions on September 2nd, please find below our initial feedback on the current language of the draft plan and development regulations. The intent of this initial feedback is to identify at a high level areas of draft code that could hinder and/or potentially preclude implementation of the BBN project and other BRT projects in the City, which are essential public facilities to be accommodated under the Growth Management Act and the City’s Comprehensive Plan (Policy LU-A1).</p> |  |
| 18b | <p><b>Minimum Floor Area Ratio (FAR)</b></p> <p>As the Land Use chapter of the draft plan acknowledges, some land uses such as essential public facilities may not be capable of meeting minimum development intensity standards. Similar to other essential public facilities with unique programmatic and operational needs, it is impracticable for the BBN project to provide the proposed minimum 0.5 FAR required in the Employment – Low Canyon Park zone.</p>   | <p>Exempting essential public facilities from the requirement would reduce the capacity of the plan to achieve the target of 45 activity units per acre as required by the regional growth center criteria. This would apply not only to the BBN but any future essential public facilities as well.</p> |

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|     | <p>For that reason, Sound Transit supports excluding essential public facilities from the minimum FAR requirements or at least, alternatives to meeting minimum FAR for essential public facilities. One such alternative would be including the Activity Unit Transfer of Development Rights (TDR) program identified as an implementation action in the Canyon Park Subarea Plan.</p> <p>Understanding that code fully implementing the TDR program may extend beyond the scope of the current Canyon Park Subarea Plan and development regulations update, however, Sound Transit also urges the Planning Commission to include provisions that allow essential public facilities to address any minimum FAR requirements adopted in the interim. We specifically ask that the Planning Commission consider incorporating provisions in code that allow the use of Conditional Use Permit conditions of approval that set aside development credits for incorporation into a future TDR program as a means of meeting the minimum FAR standard absent a fully implemented TDR program.</p> <p>Additionally, as the Planning Commission contemplates incentive zoning provisions for Canyon Park, please note that Sound Transit is in general support of utilizing TDR credits to facilitate affordable housing. Utilization of TDR credits to achieve FAR bonuses for other land uses will need to be discussed in more detail as part of TDR program implementation. Sound Transit is committed to working together with City staff to continue the conversation on our roles in implementation of alternatives to minimum FAR to ensure that the draft plan and development regulations do not operate to preclude the BBN project.</p> | <p>A TDR program would allow development of an essential public facility (e.g. BBN) below the minimum level while retaining the capacity of the regional growth center to achieve the target activity level.</p> <p>Essential public facilities are subject to a conditional use permit and participation in a TDR program could be a condition of approval.</p> <p><b>COMMISSION FEEDBACK:</b><br/>Staff recommends that development regulations provide a placeholder for creation of a TDR program that can be applied to essential public facilities.</p> |
| 18c | <p><b>Through-Block Connections</b></p> <p>Sound Transit understands that the through-block connections depicted on the draft plan and the draft Bothell Municipal Code (BMC) Figure 12.48.200 are conceptual in nature. Generally, any through-block connection that cuts through the interior of the BBN site is inconsistent with the 10% design of the facility and is unworkable considering the functional needs for BBN. These functional needs include parking and circulating up to 120 buses and approximately 250 non-revenue vehicles (NRVs). Intermixing bus and NRVs with public pedestrian and bicycle circulation in the interior of the site would present an unacceptable safety hazard and would preclude the siting of the BBN facility in its currently planned location.</p> <p>As such, Sound Transit appreciates that Planning Commission and City staff are considering flexibility that addresses the needs of all uses, particularly those envisioned for the Employment – Low Canyon Park zone with similarly large sites or building footprints. We are looking forward to assessing with City staff what, if any, through-block connection alignments and cross sections along the exterior of BBN are achievable during design refinement and during the development review process for BBN.</p>   | <p>The nature of the BBN and other large-scale facilities will make strict application of the through-block connections impracticable. Based on direction from the Commission, the development regulations will provide for flexibility in limited circumstances.</p>   |

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| <p>18d</p> | <p><b>Open Spaces</b></p> <p>The functional needs of BBN as described above constrain the areas available to provide the quantity and quality of open spaces as envisioned and required by the draft development regulations. For example, any publicly accessible outdoor space that can be accommodated (minimum 50% of the required open space), even if only publicly accessible between 6:00am and 10:00pm as proposed in the draft development regulations, would need to be located outside of the fenced area for the purposes of public safety and security. As a result, the opportunities for strict compliance with both the amount of on-site publicly accessible outdoor space and the design of said space are severely limited. Strict compliance with the amount of required on-site common outdoor space (i.e. not publicly accessible) is likewise limited by BBN operations and circulation needs.</p> <p>To account for larger sites and buildings that are nevertheless challenged to provide the required open space, Sound Transit suggests that the Planning Commission consider extending the fee in-lieu program described under draft BMC 12.48.420.B.5 to encompass buildings larger than 5,000 SF gross floor area and to consider adding provisions for design departures (similar to other sections of the draft code). Use of the fee in-lieu program and design departures could be predicated on contributing to or providing outdoor spaces off-site and/or outdoor space designs that achieve equal or better results in function, appropriate size, appeal to the senses, and activation of the space. As the open space discussion continues, it would also be helpful to understand whether the City is envisioning strategic placement of larger open space and/or a network of smaller pocket parks to satisfy these open space requirements.</p> | <p><b>COMMISSION FEEDBACK:</b><br/>Staff recommends additional discussion with ST to explore alternative means to achieve desired outcomes.</p> |
| <p>18e</p> | <p><b>20th Avenue Southeast Cross Section</b></p> <p>The note associated with draft BMC Figure 12.48.220.E.2, which depicts the typical Neighborhood Street cross section, appears to suggest that the 20th Avenue Southeast specified in the Transportation chapter of the draft plan would take precedence. The 20th Avenue Southeast cross section includes minimum 40' of street landscaping behind the curb, within which a minimum 6' sidewalk is located. Based on the 10% design for BBN, it is challenging if not impossible to accommodate both the aforementioned width of street landscaping without extending site improvements further east, where at the northeast corner a Type F streams flows on-site for approximately 55' before continuing southward off-site within a pipe that runs along the east property line.</p> <p>Due to the noted constraints, Sound Transit would like to work with the City to identify a street cross section that supports both the goals and policies of the Canyon Park Subarea Plan and the programmatic needs of BBN. The planting strip and sidewalk specified for a typical</p>  | <p><b>COMMISSION FEEDBACK:</b><br/>Staff recommends additional discussion with ST to explore alternative means to achieve desired outcomes.</p> |

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|     | <p>Neighborhood Street with a landscaped setback is a potentially viable alternative to the landscaping and sidewalk identified in the 20th Avenue Southeast cross section. Consequently, we suggest clarifying that the design departure provisions of draft BMC 12.48.220.B apply to street-specific cross sections in the Canyon Park Subarea Plan</p> <p><b>Conclusion</b><br/> Sound Transit remains committed to our engagement with the City during the Canyon Park Subarea Plan and development regulations update. As Sound Transit staff continue to review the proposed plan and code language in greater detail, we may have additional comments to share with the City. In any event, we will continue to collaborate with City staff on assessing how the vision, goals, and policies for Canyon Park and the programmatic needs of BBN can be reconciled with each other through incorporation of appropriate code and design solutions.</p> |  |
| 19  | <p><b>Exhibit 19 – Roger Belanich; 9/15/2020</b></p>  |  |
| 19a | <p><u>Park</u><br/> Among many questions concerning the Comprehensive Plan, an earlier draft of the Plan includes an evaluation of a passive park of 17 acres located along 31<sup>st</sup> Avenue SE adjacent to Canyon Park Business Center; most particularly between of the T-Mobile building and 31<sup>st</sup> Avenue. I have petitioned that this Park designation should be included on the Plan. It has been endorsed by the Canyon Park Owners Association and is now integrated into the trail system and is a Gathering Place of the Business Park and surrounding neighborhoods even though not a part of the formal CPBC. It is also a popular area used by the neighborhood although it is still my private property.</p> <p>This should at least be endorsed within the Comp Plan for a potential neighborhood and CPBC park.</p>  | <p>See response to comment 1c.</p>   |
| 19b | <p><u>Open Space/ Wetland Mitigation Area:</u><br/> There is a wetland of approximately 12 acres bordering 228<sup>th</sup> Street SE and south of the CPBC detention pond and bordering North Creek and a small tributary to North Creek. This has been identified by the Snohomish Conservation District as a restoration area (see attached letter). Talasaea Consultants have created a Mitigation Concept for this area as well (see attached).</p> <p>This area on an earlier draft of the Comp Plan was identified as a mitigation area. It should be so identified on the Comp Plan.</p>  | <p>This area is identified in the plan as a potential mitigation site.</p> |
| 20  | <p><b>Exhibit 20 – Debra Adams on behalf of Karen Martinez representing Canyon Park Business Center Owners Association; 9/16/2020</b></p>   |  |

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| 20a | <p>The Business owners in Canyon Park have serious concerns about the traffic impacts related to of the proposed subarea plan update. The proposed plan would more than double the density in the subarea and despite the fact that it would dramatically increase traffic plans for traffic mitigation are insufficient and lacking.</p> <p>The proposed subarea plan update is moving forward with little consideration for what is already there and what business owners in the Park want the Park to be like. We're not a town center; we're a biotech and office park.</p>   | <p>See response to comments 3a, 3b, 3c, 3d, and 11b. In addition, proposed land use and development regulations remove the potential for future residential development in employment areas.</p>  |
| 20b | <p>The proposed subarea plan update also creates a slew of inconsistencies with existing covenants, conditions and restrictions including proposed locations for residential housing, street standards, locations for parking, signage standards, and other city design standards. It will be impossible for landowners and developers to meet the standards in the proposed subarea update plan because of these inconsistencies.</p>   | <p>See response to comment 3g regarding existing covenants on land use. Please provide additional information on inconsistencies with covenants for parking location and other design standards (note: sign regulations are not proposed to change from existing code).</p> |
| 20c | <p>Additionally, current code suggests that all road improvements in the Park would be by developers concurrent with development. This is not realistic. Beyond significant additional costs it's not feasible to expand the streets as proposed due to inadequate right of ways and proposed standards that are not consistent with existing covenants, conditions and restrictions.</p>  | <p>See response to comments 3a and 3c.</p>  |
| 20d | <p>We support economic development and well-planned growth. However this proposed subarea plan update would have serious implications for public safety and quality of life in Bothell. The very things that Bothell residents care about – more pedestrian walkways and bike lanes, greater public safety, and livable, walkable neighborhoods – will be compromised by the lack of traffic mitigation caused by the proposed update plan.</p> <p>The Canyon Park Business Owners Association urges the Planning Commission to establish a plan to mitigate traffic and address our public safety concerns before approving the Canyon Park subarea plan update. The traffic impacts of increased density cannot be overlooked if our city wants to ensure that public safety and the quality of life for its residents is at the forefront of consideration.</p> | <p>See response to comment 3a, 3b, 3c, 3d, and 11b.</p>   |
| 21  | <p><b>Exhibit 21 – Karen Martinez representing Canyon Park Business Center Owners Association, 9/16/2020 – same as Exhibit 20</b></p>  | <p>See responses to comments in Exhibit 20.</p>   |
| 22  | <p><b>Exhibit 22 – Lisa Hodgson, WSDOT, 9/11/2020</b></p>  |   |
| 22a | <p>Thank you for the opportunity to comment on the City of Bothell's Canyon Park Subarea Planned Action Draft Environmental Impact Statement Addendum (DEIS Addendum) issued July 9, 2020. This letter provides the Washington State Department of Transportation (WSDOT)'s compiled comments on the DEIS Addendum, representing the perspectives of</p>   | <p>Comment noted.</p>   |

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|     | <p>WSDOT's I-405/SR 167 Megaprogram, Regional Transit Coordination Division, and Northwest Region.</p> <p>WSDOT appreciates the ongoing coordination with the City regarding transportation improvements in the Canyon Park area, including the proposed I-405, SR 522 Vicinity to SR 527 Express Toll Lanes Improvement Project. We will continue working with the City as both parties progress with concurrent environmental analyses that pertain to the Canyon Park area.</p> <p>WSDOT previously provided comments during the scoping and comment periods for the DEIS, including considerations for transportation, land use, and traffic assumptions. The following comments address the information provided in the Draft EIS Addendum.</p> |  |
| 22b | <p>1. WSDOT is supportive of the proposed 214<sup>th</sup> Street SE extension. This project would provide a more connected arterial street network between SR 527 and 9<sup>th</sup> Avenue SE and would improve operations on the SR 527 and SR 524 corridors.</p>   | <p>Comment noted.</p>  |
| 22c | <p>2. WSDOT appreciates that the City of Bothell provided additional analysis for the AM peak hour and also for the private roadways in the Canyon Park Business Center, as suggested in WSDOT's January 13, 2020 DEIS comment letter. We would also recommend documenting a No Action Alternative for both Analyses so we are able to fully understand the Preferred Alternative's impacts to facilities of interest to WSDOT.</p>  | <p>The AM analysis and the private street evaluation was not completed for the No Action Alternative as these are not required under the city's LOS standard. The highest traffic volumes are during the PM peak hour as evaluated in the Draft EIS. The private street analysis was only completed for the Preferred Alternative to better understand the traffic operation improvements needed to support the subarea plan growth.</p>   |
| 22d | <p>3. WSDOT requests that the City of Bothell provide traffic analysis for the 17<sup>th</sup> Avenue/I-405 Direct Access Ramps intersection for the AM and PM peak hours for the No Action Alternative and the Preferred Alternative to understand impacts to this state facility with and without the proposed action.</p>   | <p>The traffic operations at the 17<sup>th</sup> Avenue/I-405 direct access ramp intersection was not evaluated for the No Action Alternative or the Preferred Alternative. The I-405 direct access ramp study assumed during the 2045 PM peak hour that approximately 5% of the business park traffic use the direct access ramps. For the subarea plan, the traffic analysis assumed the same percentage of trips business park traffic use the I-405 direct access ramp. This results in about 160 additional PM peak hour trips traveling through the 17<sup>th</sup> Avenue/I-405 direct access ramp, with about half traveling northbound and half traveling southbound on the I-405 express toll lanes. This is</p> |

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|     |  | not likely to change intersection traffic operations to failing levels.  |
| 22e | 4. The DEIS Addendum identified impacts to the 220th Street SE/17th Avenue intersection under the Preferred Alternative. WSDOT would like to coordinate these improvements with City as the proposed mitigation moves forward.   | Comment noted.   |
| 22f | 5. WSDOT looks forward to coordinating with the City and other agencies on the transit facility concepts identified in the DEIS Addendum. WSDOT would like to better understand how each of the proposed concepts would affect person throughput, safety performance, and queue spillback onto 1-405 as compared to the No Action Alternative. In order for WSDOT to be supportive of any of these proposed concepts, the traffic analysis would need to demonstrate improved person throughput, no decrease in safety performance, and no increase in queue spillback onto 1-405.   | No new transit facilities are proposed in the subarea plan. The traffic analysis requested is noted and will be considered in a separate regional coordination effort in the future to implement transit facilities. |
| 22g | 6. In line with WSDOT's previous comments regarding LOS, WSDOT is currently not supportive of making exceptions to the agency's LOS standard and mitigation requirements at particular locations.  | Comment noted.   |
|     | <b>Exhibit 23 – Andrea Harris-Long, PSRC, 9/24/2020</b>  |  |
| 23a | <p>Thank you for keeping us informed about your planning efforts and for providing an opportunity for the Puget Sound Regional Council (PSRC) to review a draft of the Bothell Canyon Park subarea plan. Regional centers play an important role in accommodating new growth and are key regional and local destinations. We appreciate the substantial amount of time and effort the city has put into developing the plan to support an active and walkable center that reflects community values. As you know, the Regional Centers Framework provided a timeline to complete center plans by 2020. These locally-driven plans are an important step in outlining community vision and understanding how these urban places contribute to the regional system of centers. PSRC supports local planning and can serve as a resource as local governments adopt subarea plans.</p> <p>This collaboration to review draft materials helps to ensure consistency between the city's vision and the regional goals. After the subarea plan is adopted, we hope that this coordination will ensure that timely subarea plan certification action can be taken by PSRC boards.</p> <p>Many outstanding aspects of the draft plan support regional goals and the Regional Centers Framework. Particularly noteworthy aspects include:</p> | Comment noted.   |

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|     | <ul style="list-style-type: none"> <li>• Updated growth targets, along with the reduced center boundary, are consistent with criteria for Urban Regional Growth Centers in the Regional Centers Framework. When growth targets are updated prior to the 2024 comprehensive plan update, the growth targets for the regional center should be updated at that time. To assist jurisdictions in setting growth targets for regional centers, PSRC developed this guidance document.</li> <li>• Thoughtful land use planning and zoning code amendments support the transition of Canyon Park from an auto-oriented center to a place with nodes of walkable, transit-oriented mixed use development and employment.</li> <li>• Extensive analysis of transportation issues has resulted in strategies that mitigate congestion and work to decrease single-occupant vehicle trips and increase transit ridership.</li> <li>• Specific strategies work to protect, restore, and enhance wetlands throughout the center. Highlighting the North Creek Trail as an amenity will preserve this natural resource as development occurs.</li> <li>• Actions to help prevent commercial displacement as the center redevelops are innovative, and PSRC looks forward to the city’s equity analysis to inform implementation of anti-displacement strategies.</li> </ul> |   |
| 23b | <p>Before the plan is finalized, we recommend including the current mode-split in the plan and adopting a mode-split goal for the center to measure how mobility improvements benefit overall travel patterns and work towards decreasing single-occupant vehicle trips. Guidance on setting mode-split goals is available here. Adding this goal to the existing transportation policies and actions will further emphasize the need for more mobility options in the center to result in a more balanced mode-split.</p>   | <p>Information on current mode-split and goals will be added to the plan.</p> |