

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background

1. Name of proposed project, if applicable: 51st Ave Rezone

2. Name of applicant:

KM Capital LLC

3. Address and phone number of applicant and contact person:

Applicant:

KM Capital LLC
Patrick McCourt
10515 20th Street SE, Suite 202
Lake Stevens, WA, 98258
425-308-5101

Consultant:

Toyer Strategic Advisors, Inc.
David Toyer, President
10519 20th Street SE Suite 3
Lake Stevens, WA, 98258
425-501-6578

4. Date checklist prepared: January 22, 2023

5. Agency requesting checklist: City of Marysville, Washington

6. Proposed timing or schedule (including phasing, if applicable):

Application for Redesignation & Rezone	January 2023
Staff Review & Evaluation	February - April 2023
Notice of Application	TBD 2023
SEPA Notice & Appeal Period	TBD 2023
Planning Commission Review & Recommendation	TBD 2023
City Council Final Action on Rezone	TBD 2023

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

This is a non-project proposal. Applicant intends at some time in the future to submit a site-specific development proposal for a multi-family residential project consisting of approximately 768 units. Such application will be required to complete its own, site-specific, project level SEPA review.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Critical Area Approvals Summary Technical Memorandum dated February 17, 2023 by Soundview Consultants
Traffic Impact Memorandum dated February 15, 2023 by Kimley Horn
Supplemental Trip Generation Analysis Memo dated April 18, 2023 by Kimley Horn

Note: multiple studies, reports and informational documents are available since this property was originally approved by the City of Marysville for industrial development as part of a binding

site plan (PA 21006) and development agreement. This included information on the wetlands, critical areas, stream relocation of Edgecomb Creek, etc.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

None. Consultant is not aware of any pending government approvals for this site.

10. List any government approvals or permits that will be needed for your proposal, if known.

None. This is a non-project action limited to a rezone of the property. A future site specific development proposal is anticipated, but has not been submitted. Any future site-specific development application would be required, unless exempt under WAC 197-11-800 or city code, to complete a project level SEPA review, as well as apply for its own approvals and permits prior to proceeding with development.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

Applicant is seeking to redesignate and concurrently rezone to R-18 (allows medium density multi-family) approximately ±48.01 acres that is currently designated and zoned Light Industrial (LI) within the Cascade Industrial Center. The proposed ±48.01 acre rezone is currently subject to a Development Agreement and preliminary Binding Site Plan approval (PA21006) allowing for the development of ±432,000 square feet of industrial space.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The site address is: 5414 152nd Street NE, Marysville WA 98270. Geographically the site is located SE of the intersection of 51st Ave NE and 152nd Street NE between 51st Ave NE and the BNSF railroad track. A vicinity map of the location is provided as part of the application packet.

B. Environmental Elements

1. Earth

a. General description of the site:

(circle one): **Flat**, rolling, hilly, steep slopes, mountainous, other _____

b. What is the steepest slope on the site (approximate percent slope)?

< 10% slopes

- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Custer fine sandy loam, norma loam

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

None known to Consultant and none indicated on City geological hazard mapping.

- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

This proposal is a non-project action and would not directly result in any filling, excavation, or grading. The site currently has land use approval (Development Agreement and Preliminary Binding Site Plan approval) that would result in filling in conjunction with an industrial project. Any future multifamily development that may result from this rezone is likely to require filling similar to the existing land use approval although exact quantities are not known at this time. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA and submit grading and temporary erosion and sedimentation control plans for approval.

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

No. This proposal is a non-project action and no clearing, construction, or use is proposed. The site currently has land use approval (Development Agreement and Preliminary Binding Site Plan approval) for an industrial development. Construction as a result of the existing entitlements or any proposed future development could result in erosion. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA and submit grading and identify temporary erosion and sedimentation control measures.

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

This proposal is a non-project action that will not create any new impervious surfaces. However, the existing Light Industrial zoning allows up to 85% of the maximum impervious surface as previous Land Use approval (Development Agreement and Preliminary Binding Site Plan). The Applicant's proposed rezone would only be allowed a maximum of 70% impervious surface in accordance with 22C.010.080(2).

Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA and comply with applicable city standards for maximum impervious surfaces.

- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

None proposed. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA and, if necessary, propose

measures to reduce or control erosion. Any future project proposed would be required by the city to submit a grading plan for approval and identify temporary erosion and sedimentation control measures.

2. Air

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

This proposal is a non-project action that will not directly result in any emissions. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA and comply with applicable air quality regulations.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

None known.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

None proposed. This proposal is a non-project action that will not directly create any new emissions. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA and comply with applicable regulations.

3. Water

- a. Surface Water:

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

A Category II wetland (Wetland AH) flows into the Type F (fish bearing) Edgecomb Creek on the eastern portion of the site. The 51st Avenue NE ditch is located on the western site boundary. These are addressed in the Technical Memorandum by Soundview Consultants dated February 17, 2023.

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

The rezone site is currently subject to an existing development agreement and binding site plan approval for industrial development which included the filling of the 51st Avenue NE ditch, partial filling of Wetland AH, the realignment and restoration of Edgecomb Creek, and the creation of wetlands and floodplain. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA, delineate any critical areas on or adjacent to the site, and comply with applicable city standards.

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

None. This proposal is a non-project action that will not directly result in any filling or dredging of surface water or wetlands. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No. This proposal is a non-project action that will not directly result in any surface water withdrawals or diversions. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

No.

- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No. This proposal is a non-project action that will not result in any discharges of waste materials to surface waters. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

b. Ground Water:

- 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

No. This proposal is a non-project action that will not result in any ground water being withdrawn from a well. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

This proposal is a non-project action that will not result in any discharges of waste materials into the ground. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

This proposal is a non-project action that will not result in water runoff, nor require collection or disposal of water run off. Any future site-specific development proposal would be required to construct stormwater facilities in accordance with the 2019 Stormwater Management Manual for Western Washington or then-current regulations, and, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

2) Could waste materials enter ground or surface waters? If so, generally describe.

No. This proposal is a non-project action that will not result waste materials entering ground or surface waters. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

This proposal is a non-project action that does not directly alter or otherwise affect drainage patterns in vicinity of the site. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

None proposed. This proposal is a non-project action. Any future site-specific development proposal required to construct stormwater facilities in accordance with the 2019 Stormwater Management Manual for Western Washington or then-current regulations, and, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

4. **Plants**

a. Check the types of vegetation found on the site:

- deciduous tree: alder, maple, aspen, other
- evergreen tree: fir, cedar, pine, other
- shrubs
- grass
- pasture
- crop or grain
- Orchards, vineyards or other permanent crops.
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- water plants: water lily, eelgrass, milfoil, other
- other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

None. This proposal is a non-project action that will not directly result in the removal or alteration of any vegetation. Existing vegetation is likely to be removed either by the existing light industrial development approved or the proposed rezone. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

c. List threatened and endangered species known to be on or near the site.

None known. This proposal is a non-project action. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

None proposed. This proposal is a non-project action. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA and comply with any local requirements for landscaping (including plant types and ratios).

e. List all noxious weeds and invasive species known to be on or near the site.

None known. This proposal is a non-project action. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

Examples include:

birds: hawk, heron, eagle, songbirds, other:
mammals: deer, bear, elk, beaver, other:
fish: bass, salmon, trout, herring, shellfish, other _____

Animals observed in Edgecomb Creek include salmon, trout, lamprey, frogs, and salamanders. Mammal observations include beavers and other rodents such as mice and rates; deer, opossums, and raccons are also present in the area. Various song birds have been observed, and herons and hawks have been seen in the general vicinity.

This proposal is a non-project action. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA and observe for indications of other bird and animal activity specific to the site.

b. List any threatened and endangered species known to be on or near the site.

None known. While Steelhead trout (threatened), Chinook Salmon (threatened), and bull trout (threatened) could utilize Edgecomb Creek, none have been observed on-site including during the comprehensive fish studies in 2022.

c. Is the site part of a migration route? If so, explain.

None that Consultant is aware of, except that the site (and area) is generally within the Pacific Fly-way. This proposal is a non-project action. Any future site-specific development proposal,

unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

d. Proposed measures to preserve or enhance wildlife, if any:

The Edgecomb Creek corridor has already been realigned and restored under the existing land use approvals (Development Agreement and Preliminary Binding Site Plan approval) for an industrial development. Additional restoration actions (e.g. channel work, invasive plant management, and native replantings) is anticipated. The critical areas and buffers have been placed in a Native Growth Protection Area (NGPA) easement for permanent protection.

None proposed. This proposal is a non-project action that will not directly impact any wildlife. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

e. List any invasive animal species known to be on or near the site.

None that Consultant is aware of. This proposal is a non-project action. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

6. Energy and Natural Resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

None. This proposal is a non-project action that will not directly result in any energy needs. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

b. Would your project affect the potential use of solar energy by adjacent properties?
If so, generally describe.

No. This proposal is a non-project action that will not directly result in any impact to the use of solar energy on adjacent properties. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

c. What kinds of energy conservation features are included in the plans of this proposal?
List other proposed measures to reduce or control energy impacts, if any:

None proposed. This proposal is a non-project action. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA and address any requirements for energy conservation.

7. Environmental Health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal?
If so, describe.

No. This proposal is a non-project action that will not result in any environmental health hazards. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

- 1) Describe any known or possible contamination at the site from present or past uses.

None that Consultant is aware of. This proposal is a non-project action. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to complete a project level SEPA.

- 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

An Olympic Pipeline easement exists on a portion of the property. Any future development project will require coordination with the operator of the pipeline to ensure appropriate residential building setbacks.

- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

This proposal is a non-project action. No toxic or hazardous chemical will be stored, used or produced as a direct result of this proposal. Any future site-specific development proposal would be required, unless exempt by WAC 197-11-800 or city code, to complete a project level SEPA review and comply with applicable codes and standards.

- 4) Describe special emergency services that might be required.

This proposal is a non-project action. No special emergency services are required as a direct result of this proposal. Any future site-specific development under the proposed R-18 zoning would be similar to uses already permitted nearby. Any future site-specific development proposal would be required, unless exempt by WAC 197-11-800 or city code, to complete a project level SEPA review.

- 5) Proposed measures to reduce or control environmental health hazards, if any:

None proposed. This proposal is a non-project action.

b. Noise

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

Noise in the area consists of traffic along 51st Ave NE and 152nd Street NE, train traffic on the BNSF track, and construction of industrial buildings within the area. Noise will not affect this proposed non-project action.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

This proposal is a non-project action and no noise would be created by this action. However, the proposed rezone site is currently approved for an industrial development. Applicant's proposed rezone could result in future residential development, which should produce less noise than operations from an industrial facility. Any future site-specific development proposal, unless exempt by WAC 197-11-800 or city code, would be required to identify the types of noises that may be created.

3) Proposed measures to reduce or control noise impacts, if any:

None proposed. This is a non-project action.

8. Land and Shoreline Use

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

This site is currently vacant.

North: Vacant industrial land (future, under construction)

West: Existing residential development and soccer fields

East: Athletic fields, existing residential development

South: Baptist Church, existing residential development

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

The site is not currently used for agricultural purposes and is not designated as agricultural land of long-term commercial significance.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

No. This project is a non-project action that will not affect or be affected by surrounding working farm or forest land.

c. Describe any structures on the site.

None.

d. Will any structures be demolished? If so, what?

N/A

e. What is the current zoning classification of the site?

Light Industrial

f. What is the current comprehensive plan designation of the site?

Light Industrial

g. If applicable, what is the current shoreline master program designation of the site?

Not applicable Edgecomb Creek is not subject to the Shoreline Master Program.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

Yes. A Category II wetland (Wetland AH), a Type F (fish bearing) stream (Edgecomb Creek) and a wetland ditch (51st Avenue NE) are located on-site. These critical areas are addressed in the Technical Memorandum by Soundview Consultants dated February 17, 2023.

i. Approximately how many people would reside or work in the completed project?

This rezone site is currently approved for light industrial development (see PA 21006 and related development agreement), which approximately 10.18 acres of the site was rezoned from R4.5 in 2022 to accommodate. Applicant's proposed rezone would result in approximately 768 apartment units. According to the most current draft of Appendix F of the 2023 Housing Characteristics and Needs Report, renter occupied units in Marysville have an average household size of 2.74, which indicates that approximately 2,104 persons could be accommodated as a result of the proposed rezone.

j. Approximately how many people would the completed project displace?

None, this is a non-project action.

k. Proposed measures to avoid or reduce displacement impacts, if any:

None proposed for the rezone. However, future development in the R18 zone would require a ten foot Type L1 buffer and 6 foot fence along the eastern property line. This is a non-project action.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

None proposed.

- m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

None proposed. This is a non-project action.

9. Housing

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

None immediately. However, it is likely that approximately 768 market rate apartment units would be developed as a result of the rezone. This proposal is a non-project action.

- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

None. This proposal is a non-project action.

- c. Proposed measures to reduce or control housing impacts, if any:

None proposed. This proposal is a non-project action.

10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

The existing Light Industrial zone allows a base building height of 65 feet, whereas the proposed R18 zone allows a maximum building height of 45 feet. The result of the rezone would be a reduction in building heights adjacent to residential areas to the southwest, south and east. This proposal is a non-project action and any future development will be required to comply with adopted building height requirements.

- b. What views in the immediate vicinity would be altered or obstructed?

None.

- c. Proposed measures to reduce or control aesthetic impacts, if any:

None proposed. This proposal is a non-project action but any future development under the R18 zone will require compliance with applicable design and landscaping standards.

11. Light and Glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None. This proposal is a non-project action. Any site-specific development proposal would, unless exempt by 197-11-800 or city code, be required to complete a project level SEPA review and comply with applicable standards for lighting.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No. This proposal is a non-project action. Any site-specific development proposal would, unless exempt by 197-11-800 or city code, be required to complete a project level SEPA review and address any light or glare that may be a safety hazard or interfere with views.

c. What existing off-site sources of light or glare may affect your proposal?

None that Consultant is aware of. This proposal is a non-project action. Any site-specific development proposal would, unless exempt by 197-11-800 or city code, be required to complete a project level SEPA review.

d. Proposed measures to reduce or control light and glare impacts, if any:

None proposed. This proposal is a non-project action.

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

Strawberry Fields Athletic Complex, North County Wildlife Park, off-leash dog park, and Centennial Trail Armar trail head (east); 152nd Soccer Complex, Gissburg Twin Lakes (west); Timberbrook – Heather Glen Park (south); and Airport Trail (north).

b. Would the proposed project displace any existing recreational uses? If so, describe.

No. This proposal is a non-project action.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

None proposed. Any future site specific development within the R18 zone would be required to provide applicable on-site open space and pay park mitigation fees, if any. This proposal is a non-project action.

13. Historic and cultural preservation

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

None that consultant is aware of. This proposal is a non-project action. Any site-specific development proposal would, unless exempt by 197-11-800 or city code, be required to complete a project level SEPA review and may be required to complete further analysis of cultural resources.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

None that consultant is aware of and no analysis has been completed for this proposal as it is a non-project action. Any site-specific development proposal would, unless exempt by 197-11-800 or city code, be required to complete a project level SEPA review and may be required to complete further analysis of cultural resources.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

None that consultant is aware of. This proposal is a non-project action. Any site-specific development proposal would, unless exempt by 197-11-800 or city code, be required to complete a project level SEPA review and may be required to complete further analysis of cultural resources. Any future site specific project would be required to follow the Department of Archaeology and Historic Preservation's Inadvertent Discovery protocols if a cultural resource were encountered.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

None proposed. This proposal is a non-project action.

14. Transportation

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

51st Ave NE, 152 Street NE, 67th Ave NE, Smokey Point Boulevard, Highway 9, State Route 531. The site is anticipated to have access to 51st Avenue NE and/or 152nd Street NE. The frontage improvements will add to the planned 3-lane and 5-lane sections, respectively, identified by the City of Marysville. This is a non-project action and no road connections or alterations to existing ingress/egress to the site are proposed.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

Site is served by Community Transit route 202. The closest existing stop is located at 51st and 146th ST NE (stops 699 and 1173). Route 202 runs between the Smokey Point Transit Center on Smokey Point Boulevard near State Route 531 and the Lynnwood Transit Center with seven buses arriving at Stop 1173 between 5am and 9am weekdays and five buses heading north that arrive at Stop 699 between 5pm and 8pm on weekdays.

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

None. This proposal is a non-project action.

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

Not as a result of the rezone. However future development, at a minimum, will be required to make frontage improvements along the property's 51st Avenue NE and 152nd Street NE frontages consistent with those portions of the 3-lane and 5-lane sections, respectively, identified by the City of Marysville for these roadways. Frontage improvements are likely to consist of additional right-of-way dedication, road widening, stormwater improvements, and pedestrian walkways within the public right-of-way. Because this proposal is a non-project action, any future site-specific development would be required, unless exempt by WAC 197-11-800 or city code, to complete a project level SEPA review and transportation impact analysis (TIA) to identify any additional improvements.

e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

It is anticipated that the rezone could lead to approximately 768 multifamily units that could generate approximately 3,500 daily trips with 284 AM peak-hour trips (one hour between 7:00AM and 9:00AM) and 300 PM peak-hour trips (one hour between 4:00PM and 6:00PM). This trip generation is based on data published in the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 11th Edition (2021)*. However, the rezone proposal is a non-project action and any future site-specific development would be required, unless exempt by WAC 197-11-800 or city code, to complete a project level SEPA review and transportation impact analysis (TIA) to identify any improvements.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No. This proposal is a non-project action.

h. Proposed measures to reduce or control transportation impacts, if any:

None proposed. This is a non-project action. Any future site-specific development would be required, unless exempt by WAC 197-11-800 or city code, to complete a project level SEPA review and transportation impact analysis (TIA) to identify any improvements.

15. Public Services

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

No. This proposal is a non-project action. The rezone site is approved for a light industrial project that would have increased the need for certain public services. With the proposed rezone the needs for public services may change (e.g. schools) and any future site-specific development in the R18 zone is likely to increase needs for public services.

b. Proposed measures to reduce or control direct impacts on public services, if any.

None proposed for the rezone; however any future residential project in the R18 zone would be required to pay applicable mitigation fees for school, traffic and parks, as well as applicable water, sewer and stormwater infrastructure capital improvement charges. This is a non-project action.

16. Utilities

a. Circle utilities currently available at the site.

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

Any future site-specific development would be required to extend (if necessary) and connect to City of Marysville water, sewer and stormwater infrastructure.

d. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

None proposed as part of this rezone. Future development would be required to connect to City of Marysville water, sewer, storm and electric infrastructure. Any future site-specific development would be required, unless exempt by WAC 197-11-800 or city code, to identify utilities proposed for the project and any required mitigation.

C. Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:  _____

Name of signee: David Toyer

Position and Agency/Organization: President, Toyer Strategic Advisors

Date Submitted: January 23, 2023

Date Revision Submitted: April 20, 2023

D. Supplemental sheet for nonproject actions

(IT IS NOT NECESSARY to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

This non-project proposal is not likely to directly increase discharge to water, emissions to air, etc. Any future site-specific development proposal would be required, unless exempt from WAC 197-11-800 or city code, to complete a project level SEPA review to address impacts that future proposal might have on discharge to water, emissions to air, etc.

Proposed measures to avoid or reduce such increases are:

None proposed. Any future site-specific development proposal would be required, unless exempt from WAC 197-11-800 or city code, to complete a project level SEPA review.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

This proposal is not likely to affect plants, animals, fish or marine life. The area proposed for the redesignation and rezone is within an urban growth area (UGA) and has been designated and zoned for urban development within a 20-year comprehensive plan.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

None proposed. This proposal is a non-project action. Any future site-specific development proposal would be required, unless exempt under WAC 197-11-800, to complete a project level SEPA review. The prior approved industrial project, binding site plan and development agreement identified and proposed mitigation measures to address these topics. Any future site specific development would evaluate the difference between those reports and assumptions and such proposed future development.

3. How would the proposal be likely to deplete energy or natural resources?

The proposal is not likely to deplete energy or natural resources. The proposal is a non-project action to change the zoning designation. Future development of this site has been anticipated in local and regional land use plans and will occur in some form regardless of the land use designation or zoning. Any future site-specific development proposal would be, unless exempt by WAC 197-11-800, required to complete a project level SEPA review.

Proposed measures to protect or conserve energy and natural resources are:

None proposed. This is a non-project action and would not have any direct impacts on energy conservation or natural resources. Any future site-specific development would be required, unless exempt by WAC 197-11-800 or city code, to complete a project level SEPA review.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

This proposal is a non-project action and not likely to directly use or affect environmentally sensitive areas or areas designated for government protection. Future development of this site has been anticipated and planned for in local and regional land use plans and development will occur in some form regardless of the land use designation or zoning. Any future site-specific development proposal would, unless exempt by WAC 197-11-800, be required to complete a project level SEPA review.

Proposed measures to protect such resources or to avoid or reduce impacts are:

None proposed. The proposal is a non-project action to change land use. Any future site-specific development proposal would be, unless exempt by WAC 197-11-800, required to complete a project level SEPA review and comply with local regulations pertaining to protection of sensitive areas. The City's code establishes regulations to protect environmentally sensitive areas based on the type of sensitive area and not the type of land use designation and zoning.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

The proposal is not likely to affect land and shoreline use nor allow or encourage land or shoreline use incompatible with existing plans. The proposed land use designation and zoning are consistent with the adjacency of other land use and zoning designations in the immediate area.

Proposed measures to avoid or reduce shoreline and land use impacts are:

None proposed. This is a non-project action and does not directly affect any designated shorelines. Any future site-specific development proposal would be, unless exempt by WAC 197-11-800, required to complete a project level SEPA review and comply with local regulations pertaining to protection of sensitive areas or shorelines, if any.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

This proposal is a non-project action. However, the change in land use may alter future demands on transportation, including changes in the volume, type and timing of vehicular trips and/or the use of available transportation alternatives in the area.

Any future site-specific development proposal would be, unless exempt by WAC 197-11-800, required to complete a project level SEPA review and complete a transportation impact analysis (TIA) to identify the specific project impacts on the transportation system.

Proposed measures to reduce or respond to such demand(s) are:

None proposed. This is a non-project action. However, any future site-specific development proposal would, unless exempt by WAC 197-11-800, be required to complete a project level SEPA review and a transportation impact analysis (TIA) to identify the specific project impacts on the transportation system.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

This is a non-project action that is not likely to conflict with any local, state, or federal laws or requirements for the protection of the environment.