



FREQUENTLY ASKED QUESTIONS

Town Center Draft Environmental Impact Statement (Draft EIS)

Message from City Council

Thanks to all who commented on the Town Center Draft Environmental Impact Statement (Draft EIS). Our staff received and we've read lots of great feedback. We are grateful to all the residents who took time to review the Draft EIS materials and share their thoughts.

Over the next two months, the Council will be working to identify policy priorities for Town Center based on the VISION, a careful review of comments received during the environmental review process, and the continued public process for the Town Center subarea plan and its development regulations.

We heard the request by some members of the community to extend the time we had originally allotted to publish the Final Environmental Impact Statement (Final EIS) and our deliberations on the plan and regulations. The State Environmental Policy Act (SEPA) recommends a goal of publishing the Final EIS within 60 days of the close of comments on the Draft EIS, and the City will be working toward this goal. This additional time will ensure that we are able to consider the significant amount of public input received.

The Council is moving its schedule for adoption out to the Spring with final deliberations beginning in May after publication of the Final EIS.

In the interim, we have asked our consultants to prepare the following FAQ sheet to provide clarification of several issues that have been raised by the public. Please note that public comments received on the Draft EIS will be addressed in the Final EIS.

Be sure to visit YourLFP.com for project updates, including a [new document that answers "Frequently Asked Questions" \(FAQs\)](#) about the Town Center planning process.

Thank you for your continued participation throughout this ongoing process!



QUESTION:

1. What is the purpose of the non-project Draft EIS for Town Center?

ANSWER:

Summary: The purpose of the non-project Draft EIS prepared for Town Center is to evaluate impacts that could occur if changes are made to the City's planning documents and land use regulations related to Town Center.

Additional Details:

To support implementation of the Town Center VISION, completed in 2018, the City of Lake Forest Park (City) is preparing a subarea plan for Town Center and revisions to its land use regulations to better facilitate redevelopment that aligns with the desires of the community, as expressed in the VISION. The adoption of a subarea plan and new land use regulations qualify as agency non-project actions (see [WAC 197-11-704](#)), thus triggering the requirement to study impacts and alternatives under the State Environmental Policy Act (SEPA) (refer to the Revised Code of Washington Chapter [43.21C](#)). To comply with these requirements, the City is studying impacts and evaluating mitigation measures of those impacts in a non-project Environmental Impact Statement (EIS). A Draft EIS must be produced for public review and comment before the City can issue a Final EIS and proceed with adopting a subarea plan and amendments to land use regulations.

The purpose of the Draft EIS is to study a range of potential impacts and identify ways those impacts can be mitigated based on analysis of a reasonable range of alternatives. For the Town Center, two "action" alternatives are analyzed and compared to a "no action" alternative. The alternatives are not actual development plans or proposals, but rather planning level concepts created for purposes of analysis in the Draft EIS and gathering public and agency comments. It is common practice for a Draft EIS to study a range of development levels from low to high, as this facilitates a comprehensive understanding of potential impacts.

The Draft EIS analysis and public and agency comments received on the Draft EIS will help inform the Council's decision-making process related to the final Vision and Plan for Town Center and supporting code provisions

QUESTION:

2. What is the intent and focus of this Draft EIS compared to other environmental analysis that may be done for future projects?

ANSWER:

Summary: The Draft EIS conducted by the City is a less specific, planning-level evaluation of impacts; whereas the environmental review conducted with future projects will consider the specific components of those proposed projects.

Additional Details:

A “non-project” Draft EIS analyzes potential planning alternatives for subarea plans, comprehensive plans, and transportation plans, as well as various supporting amendments to regulations, such as city land use code, under the State Environmental Policy Act (SEPA). A non-project Draft EIS provides a programmatic level of analysis suitable for determining the potential for probable significant unavoidable environmental impacts associated with the alternatives analyzed. This is not a project-specific level of analysis, which is typically more detailed and aligned with design and construction activities.

For example, Sound Transit will be developing a separate project-specific EIS for the bus rapid transit corridor project, and that EIS will have a separate public review process. Sound Transit’s environmental review is scheduled to occur in 2019. Future phases of redevelopment at Town Center also would be subject to separate SEPA review through future environmental analysis and documentation to the level required based on the development proposed.

QUESTION:

3. What is the purpose of the alternatives presented in the Draft EIS?

ANSWER:

Summary: The alternatives studied in the Draft EIS are tools for evaluating the impacts of potential development. They commonly represent a range of development levels, enabling the analysis of impacts at varying levels of development. They are not actual development proposals.

Additional Details:

Three alternatives were analyzed in the Draft EIS. Alternative 1, No Action, assumes the current regulations of LFPMC Title 18 would not be revised and a new subarea plan/vision for Town Center would not be adopted. The Alternative 2 and 3 action alternatives both assume that the subarea plan would be adopted, and the existing regulations would be revised.

The alternatives in the Draft EIS are not actual development proposals. They are theoretical concepts developed for the purpose of analysis and providing a framework to gather public and agency comments. The scenarios were created to provide a framework for evaluating potential impacts that might occur with varying levels of development. A primary purpose of the Draft EIS is public and agency review of the alternatives analysis and gathering comments.

Decisions about potential building height and form will be made after the public and agency comment period closes. Future redevelopment would be designed and developed in accordance with the adopted Town Center VISION/PLAN and amendments to land use regulations. The future design of redevelopment may look different than shown in the alternative scenarios in the Draft EIS, with different building heights, sizes, and configurations, different areas of open space, and other features than those shown in the alternative scenarios in the Draft EIS. New development on the Town Center could come in many shapes, sizes, and phases over time, all subject to the VISION/PLAN, land use regulations, market conditions and the investment approach of the property owner.

QUESTION:

4. *What is the history of the planning process and related timeline to date, and what are the next steps ahead in the City Council review and adoption process?*

ANSWER:

Summary: In 2017 and 2018, the City gathered input about Town Center from the City's residents. Summarized in the Town Center VISION, that input has guided the Planning Commission's review of code changes that could help facilitate development at Town Center, consistent with the community's desires. The City Council will now review comments received on the Draft EIS, and work to establish an approach to Town Center redevelopment that maximizes benefits to the community.

Additional Details:

Starting in the fall of 2017 and continuing through the present, the City of Lake Forest Park has been reaching out to its residents to ask for input on the future of Town Center. Through a series of more than 30 public and stakeholder workshops and meetings from fall 2017 through spring 2018, the City began a planning and visioning process to guide the future development of the Town Center. The insights received from these meetings formed the draft Town Center Vision (VISION), which is available for review at: www.yourlfp.com in the Project Library. While the VISION has been accepted by City Council, it is a draft document that will be finalized as part of the Town Center subarea plan after the EIS process is complete.



To prepare for and facilitate possible investments by the shopping center owner and Sound Transit, the Lake Forest Park City Council asked the Planning Commission to develop proposed amendments to the land use regulations related to Town Center in the Lake Forest Park Municipal Code in order to support implementation of the draft VISION. The Planning Commission began its work in summer 2018. Potential elements under consideration such as building height and form, open space provisions, and setbacks **have not yet been determined** and are still under consideration. The purpose of this process is to gather public and agency input on these potential elements.

The SEPA environmental review process began in October 2018 with two public scoping events, a public scoping meeting at City Hall on October 10, 2018 and an outdoor open house on October 14, 2018. The Draft EIS was released for public review and comment on January 2, 2019.

The path forward includes the review of all public comments received on the Draft EIS. Then, the City will formulate a Final EIS based on those comments, and the City Council will consider adopting a final Town Center VISION/PLAN supported by the Final EIS, along with amendments to land use regulations. The City Council's formal review and adoption process will occur after the publication of the Final EIS, draft Town Center Plan, draft code amendments, and draft design standards. This process will include a formal public hearing, as well as multiple council meetings where public comment will be accepted.

This year (2019), Sound Transit will continue planning and designing improvements adjacent to and at Town Center related to the ST3 bus rapid transit project along SR 522. These project improvements will be subject to compliance with the adopted Town Center VISION/PLAN and amended land use regulations that will include specific design standards and guidelines. In addition, any future development proposals that may occur at Town Center by property owners also will be subject to compliance with the adopted VISION/PLAN and code amendments. The City will review any such proposal for compliance with the adopted land use regulations. It is anticipated that future redevelopment would occur incrementally in multiple phases over the next 15 to 20 years.

To date, the City has . . .

- 1) **Gathered community input** on the vision for the future of Town Center. [Learn more about who we've heard from.](#)
- 2) **Developed a Draft Town Center VISION** that captures participants' long-term interests. The VISION is guiding 1) City Council as they develop policies regarding land use and connections within Town Center, 2) the creation of the Town

Center Plan (VISION/PLAN), and 3) supporting code amendments.

- 3) **Collected feedback on the draft VISION at an Open House and accepted the draft VISION as a guiding document.**
- 4) **Drafted proposed code amendments** after City Council requested development of possible amendments to the Planning and Land Use Regulations chapter of the code to align design and development requirements so that they better support implementation of the VISION/PLAN.
- 5) **Collected community feedback on the draft code amendments and issues to be analyzed in the Environmental Impact Statement (EIS)** online, at a formal scoping meeting, and at an Open House. [View materials.](#)
- 6) **Gathered comments on the Draft EIS.**

Right now, the City is . . .

- 1) **Reviewing feedback on the Draft Environmental Impact Statement (Draft EIS)** to support the Town Center VISION/PLAN and amendments to land use regulations.
- 2) **Ensuring that the draft code amendments reflect the community's interests** by developing them through public comment, Planning Commission, and City Council.

What's Next?

The City will review all public comments received and develop responses to those comments for publication in the Final EIS. The current plan is that the Final EIS will be published in early April, followed by the draft Town Center VISION/PLAN, proposed code amendments, and design standards. Once all materials have been published, the City Council will initiate a review and deliberation process and will invite public comments at a series of City Council meetings. Refer to additional information about the visioning, planning, and environmental analysis process at: www.yourlfp.com.

QUESTION:

5. Why is the City creating a subarea plan and revised land use regulations for Town Center?

ANSWER:

Summary: The City is considering revised land use regulations to better align the regulations with the VISION, and to incorporate provisions related to housing affordability, how a transit parking structure would fit in, pedestrian-friendly design, and to clarify the review and approval process.

Additional Details:

A formal subarea plan and supporting design standards and guidelines for Town Center are needed to more clearly guide redevelopment and projects in the Town Center so that these projects align with the Town Center VISION. Creating subarea plans for special districts that may require specialized policies and design provisions in a community is a common comprehensive planning practice. Under SEPA, development of subarea plans and amendments to land use regulations are considered “non-project” actions. Potential redevelopment alternatives for the Town Center and related amendments to the City’s land use regulations are analyzed in the Draft EIS.

The current code regulations applicable to the Town Center include Chapter 18.42 of the Lake Forest Park Municipal Code, as well as provisions of the 2005 Urban Framework Design Guidelines document. The current code and design guidelines do not sufficiently address how a bus rapid transit commuter parking structure or other structured parking should be designed at Town Center. Guidelines related to transit-oriented development and pedestrian-friendly design need to be added. Housing affordability is also not currently addressed, and the design review/development review provisions also need to be further clarified.

QUESTION:

6. If the Town Center is redeveloped in the future, where would Third Place Commons be located?

ANSWER:

Summary: Future redevelopment plans will determine where Third Place Commons will be located. The City understands the importance of the Commons to the Lake Forest Park community and is committed to ensuring the ability of the Commons to continue serving as the community’s gathering place.

Additional Details:

One of the highest priorities identified by the community in the Town Center Visioning process

completed in 2018 was retaining the function of Third Place Commons as a civic gathering space within any future redevelopment of the Town Center. The City is strongly committed to this priority and will be working closely with Merlone Geier Partners (the property owner of the Town Center shopping complex) on the Commons continuing to have a permanent home at Town Center. At this time, there are no proposed plans for redevelopment, and, as such, details related to specific relocation or renovation of the Commons are unknown.

The Draft EIS analyzes potential options for future open space, civic expansion, and enhancing the Town Center as the heart of the Lake Forest Park community. Under the redevelopment scenarios analyzed, the Commons could continue to exist as part of a mixed-use redevelopment, or it could be integrated into new community/civic space at some point in the future.

While there are no specific plans at this time for civic expansion, the Draft EIS indicates there could be a potential to create a built (indoor) mixed use and civic space as an active space along the frontage of a commuter parking structure. This space could be located at any level (ground level or floors above) and if located above, could have views of Lake Washington. The Draft EIS also mentions that this space could adjoin and connect to a roof garden or other public green space/viewing area on the top of a commuter parking structure. This has been misunderstood and misinterpreted to mean that the Draft EIS is proposing the Third Place Commons would be located on the parking structure roof. All potential planning concepts and design ideas explored in the Draft EIS are theoretical and not actual proposed plans. The ideas are presented for the purpose of analysis of the alternatives and gathering public and agency comments.

QUESTION:

7. I am concerned that the two action alternatives don't show enough open space and amenities.

ANSWER:

Summary: The alternatives studied in the Draft EIS are planning-level concepts reflecting potential development elements such as buildings and streets. The alternatives are not actual design plans for the Town Center. Given the planning level of detail of these scenarios, they don't show specific plans for open space areas and amenities. This level of detail would come later as part of any redevelopment plans proposed by Merlone Geier Partners or other property owners. Outcomes from the Draft EIS process will shape the final Town Center PLAN/VISION and amendments to land use regulations

QUESTION:

8. Has the City Council already selected a preferred alternative?

ANSWER:

Summary: No. A preferred alternative is not selected until after the Draft EIS comment period concludes. This enables the City to benefit from the Draft EIS's analysis and from public and agency comments before selecting a preferred direction for Town Center.

QUESTION:

9. Has the City Council already chosen a site for the Sound Transit parking structure?

ANSWER:

Summary: No. The City has not chosen a site for the Sound Transit parking structure, except to express to Sound Transit its preference to have the commuter parking garage somewhere at Town Center.

Additional Details:

If a parking structure is located at Town Center, as proposed by ST3, a wide array of considerations will drive its configuration and location within the site. To prepare for this decision, the City and Sound Transit have discussed the importance of good pedestrian access, aesthetics, visibility between the parking structure and the bus rapid transit station, potential uses of the parking structure for city vehicles and shoppers, geotechnical considerations, costs, and coordination with the owner of the shopping center. Siting of the garage at Town Center will require extensive coordination among the city, the shopping center owner, and Sound Transit. To facilitate comparison of the alternatives, the Draft EIS showed one potential location for all three alternatives. This may or may not be the ultimate location selected for the parking structure.

QUESTION:

10. What are the mall owner's plans for the Town Center?

ANSWER:

Summary: The owner of the shopping center, Merlone Geier Partners ("MGP"), has said that it does not have a specific plan for the site. Instead, MGP indicates that once the City adopts the Town Center VISION/PLAN and supporting changes to its land use regulations, MGP will evaluate investment possibilities that would comply with the City's regulations and be economically successful in today's market.

QUESTION:

11. Why doesn't the Draft EIS analyze the full build potential of Alternative 1?

The Draft EIS indicates that approximately 1,000 multi-family units could be developed at Town Center while keeping the same amount of commercial space as exists today, but it only analyzes 700 multi-family units.

ANSWER:

Summary: The No Action alternative must base its analysis on a reasonable assumption about what could happen in the absence of a regulatory change. In addition to the 700 units depicted in Alternative 1, the current land use regulations at Town Center would allow redevelopment in the southern surface parking area, where approximately 300 multi-family units could be developed. While this level of development is technically feasible under the current code, the City does not believe it is reasonably likely to happen within the same timeframe as the other two alternatives studied (15 to 20 years or more), and therefore did not include the additional 300 units in Alternative 1.

Because Alternative 1—No Action serves as a baseline for comparison to the action alternatives in the Draft EIS, it is important not to overestimate or underestimate the potential redevelopment that may occur. Assumptions should represent what is reasonable and realistic.

Additional Details:

Some in the community may have been under the impression that the current regulations only allowed 250 units because the initial study in 2004-2005 (Sustaining a Livable Lake Forest Park: The Future of Our Town Center) includes statements such as the following one that can be found on page 30 of that document:

“A vibrant Town Center would include on-site multifamily housing. City and regional demand, quantified in the market analysis, supports at least 150-250 multifamily housing units at the Center.”

That statement is from Task Force's policy recommendations. It is important to note that the Task Force did not recommend a maximum density and that the updated Town Center regulations and Design Guidelines Framework were adopted without one in 2006. The number of units was strictly an estimate of the market demand at that time.

The scale of development is primarily regulated by height (as discussed Question 12 below). The number of units can expand depending on the size of unit that the developer thinks is most marketable. There has been significant change in the demand for multifamily development over the last decade. While the housing market was strong in 2005, the population growth and

housing demand the region is experiencing today are unprecedented, with dramatic changes since 2005 in the number and types of units being demanded.

QUESTION:

12. How were the height limits of 60 to 66 feet – allowed under the current code and applicable to Alternative 1, No Action – determined?

ANSWER:

Summary: The Town Center Framework Design Guidelines, adopted in 2005, specify the number of building stories allowed, and the permitted heights for each floor, depending on use. The dimensions described in the Guidelines were used to calculate that buildings of 60-66 feet would be permitted under the current code.

Additional Details:

Alternative 1 assumes current land use regulations in the Lake Forest Park Municipal Code (LFPMC) and the Town Center Framework Design Guidelines (“Guidelines”), adopted in 2006, would remain in effect. The Guidelines overlay and supersede other provisions in the LFPMC. For example, while the LFPMC allows a 40-foot height maximum for mixed use buildings, the Guidelines allow up to 4-over-1 (five) levels applying bonus provisions. The Guidelines state: “Density shall be determined by form rather than prescription. Density will be based upon complying with elements such as Edge Conditions and floor-to-floor heights.”

The floor-to-floor heights allowed by the framework design guidelines are as follows:

- Grocery 20 feet
- Retail 18 feet
- Office, Live/Work and Service 12 feet
- Residential 10 feet

These height limits were referenced to determine that the approximate height of a five-level building under Alternative 1 could reach 60 to 66 feet (such as a 20-foot grocery level with four 10-foot residential levels or an 18-foot retail level and four 12-foot live/work or office levels).

Alternative 2 evaluates the potential for varying building height and form at the Town Center, up to a maximum height of 75 feet to the base roof line (one floor level above current allowed height limits), and Alternative 3 assesses the potential for more uniform building height and form across Town Center, up to a maximum height of 85 feet to the base roof line (two floor levels above the current allowed height limits).

QUESTION:

13. Would there be impacts to the quality of the artesian water source as a result of redevelopment at the Town Center?

ANSWER:

Summary: Redevelopment at Town Center would not contaminate the artesian water source due to the water source's location 200 feet above the Town Center site and due to the numerous regulatory controls that are designed to protect groundwater sources.

Additional Details:

The analysis of the potable water system in the Utilities section of the Draft EIS was prepared in collaboration with the Lake Forest Park Water District and its engineer, Mundall Engineering and Construction. The Draft EIS analysis addresses potential demands on the potable water system and fire flow capacity related to the potential redevelopment alternatives analyzed. Some members of the public have inquired whether the artesian water supply would be tainted as a result of redevelopment. The shallow artesian well field in the McKinnon area is more than 200 feet above the Town Center in elevation, and as such, tainting of the water supply would not be expected to occur. In addition, strict regulatory controls and wellhead protection requirements are enforced by multiple agencies to protect the area's and region's public water supply.