

Lacey Gateway Town Center

**Final Supplemental
Environmental Impact Statement**



City of Lacey

January 26, 2010

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together

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January 25, 2010

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Dear Reader:

Attached to this letter is the Final Supplemental Environmental Impact Statement (FSEIS) for the Lacey Gateway Planned Action. This document supplements the Environmental Impact Statement (EIS) prepared for the City of Lacey and Lacey Urban Growth Area Comprehensive Plan (1994).

The purpose of the SEIS is to identify the significant environmental impacts, mitigation measures and unavoidable impacts applicable to designating Phase 1 of the Gateway Town Center site, located in the Northeast Planning Area of Lacey as a "planned action" (per RCW 43.21C.030(2)(a) and WAC 197-11-164); and developing the site as a mixed use urban town center.

The planned action designation will facilitate future environmental review for proposals that conform to the development standards and mitigation conditions that will be adopted by the City Council in a planned action ordinance. The planned action designation will be valid twenty (20) years from the date the City Council adopts the Lacey Gateway Planned Action Ordinance. Full build out of Phase 1 of the Town Center is expected to occur over a ten (10) year period once initial site construction commences. The Lacey Gateway site is a key development opportunity for the City, and its future land use; design and impacts have been identified and addressed in numerous City plans and environmental documents.

The Draft and Final SEIS focuses on geology and soils, air, water, plants and animals, cultural resources, land use and aesthetics, transportation, public services utilities and noise. The Final SEIS responds to comments received on the Draft SEIS from agencies and interested members of the public. It also clarifies information and revises mitigation measures where appropriate based on the comments received.

Please contact me or Samra Seymour, Assistant Planner should you have any questions regarding this document at 360.491.5642.

Sincerely,

Rick Walk, AICP
SEPA Responsible Official

Please note: A date for public hearing by the City Council to consider adopting the Planned Action Ordinance has not been set at this time. Prior to the public hearing, notification will be provided to the general public and directly to all agencies and members of the public who have commented on the EIS.



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FACT SHEET

Project Title	Lacey Gateway Town Center Planned Action
Proposed Action	The Lacey Gateway Planned Action consists of three major elements: (1) approval to develop Phase 1 of a multiple phase mixed-use urban town center in the City of Lacey Northeast Planning Area, and (2) establishment of a development agreement between the applicant (Hawks Prairie Investment LLC) and the City of Lacey, as authorized by RCW 36.70B.170 et seq; and (3) adoption of an ordinance by the Lacey City Council designating Phase 1 of the Gateway Town Center as a “planned action” for purposes of State Environmental Policy Act (SEPA) compliance, pursuant to RCW 43.21C.031(2)(a) and WAC 197-11-164.
Location	The Lacey Gateway Planned Action site is 120 acres in size and is located to the north of Interstate 5, south of Britton Parkway and east of Gateway Boulevard and the recently opened Cabela’s store.
Lead Agency	City of Lacey
Responsible Official	Rick Walk, Community Development Director
Contact Person	Rick Walk, AICP, Director of Community Development City of Lacey, Community Development 420 College Street SE PO Box 3400 Lacey, WA 98509
Licenses, Permits, and Approvals	<u>City of Lacey</u> Site plan review of master plan, site plan review approval, administrative design review, wetland development review, Forest Practices permit, preliminary and final binding site plan, grading permit, civil construction drawings and building permits <u>State of Washington</u> National Pollution Discharge Elimination System (Dept. of Ecology)
Authors to this SEIS	Jean Carr, Principal Planner Shea, Carr & Jewell 2102-H Carriage Drive SW Olympia, WA 98502 City of Lacey, Community Development Department staff
Date of Issue of Draft SEIS	June 16, 2009
Date of Issue of Final SEIS	January 26, 2010

Prior Environmental documents

This document supplements the EIS prepared for the Lacey Comprehensive Plan - Draft EIS March 1994, Final EIS May 1994

The following environmental documents are being incorporated by reference for purposes of SEPA compliance:

- Northeast Area Planning Element (1992)
- Determination of Non-significance–Northeast Area Planning Element Environmental Assessment (1992)
- City of Lacey and Thurston County Land Use Plan for the Lacey Urban Growth Area (October 1994)
- Environmental Impact Statement–City of Lacey and Lacey Urban Growth Comprehensive Plan (Final 1994, Draft 1994)
- 1994 City of Lacey Transportation Plan
- Northeast Area Transportation Study (1996)
- City of Lacey Northeast Area Local Improvement District Expanded Environmental Checklist (1997)
- Market Analysis for the Lacey Central Business District and Hawks Prairie Business District (January 1997)
- City of Lacey Regional Drainage & Planning Report for: Northeast Area Drainage Analysis & Land Use Analysis Study, (July 1, 1997)
- Determination of Non-significance–Ordinance No. 1054–Amendments to Chapter 16.37 of the Lacey Zoning Code, Hawks Prairie Business District zone. (1997)_
- Hawks Prairie Tree and Vegetation Inventory and Analysis (May 29, 1997)
- 1998 City of Lacey Transportation Plan
- Determination of Non-significance–Ordinance No. 1139–Adoption of design standards, design review checklist and conceptual plans. (2000)
- City of Lacey and Thurston County Land Use Plan for the Lacey Urban Growth Area (2004)
- Determination of Non-significance - City of Lacey and Thurston County Land Use Plan for the Lacey Urban Growth Area (2003)
- Mitigated Determination of Non-significance - SPR 06-316, Cabela’s Retail Store Site Plan Review

Agency Action and projected date for action

No decisions or actions will be made by the City of Lacey until at least seven (7) days after issuance of the Final SEIS.

Subsequent Environmental Review

The environmental review contained in this document addresses the environmental impacts associated with Phase 1 of the Lacey Gateway. No further environmental review of Phase 1 is required for project proposals which are consistent with the planned action ordinance and whose impacts have been addressed in the planned action SEIS.

SEIS Availability

Copies of both the Draft and Final SEIS have been distributed to agencies, organizations, and individuals as noted on the distribution list. Hard copies are available at Lacey Timberland Library for review. Digital copies may be obtained at Lacey City Hall, Community Development Department at no cost. Paper copies are available upon request at a cost of \$25.

Lacey Gateway Planned Action Draft SEIS

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 - Soils Investigation for Stormwater Facility Design, Pacific Rim Soil & Water, September 6, 2006
 - Additional Soils Investigation – Addendum – Pacific Rim Soil & Water, October 4, 2006
- Appendix B Grading and Erosion Control
- Grading Plan, Hatton Godat Pantier, January 2009
- Appendix C Reclaimed Water
- Reclaimed Water Study, Huitt-Zollars, Inc., revised September 15, 2008
 - Preliminary Reclaimed Water Plan, Hatton Godat Pantier, January 2009
- Appendix D Stormwater
- Lacey Gateway Preliminary Drainage and Erosion Control Report, Hatton Godat Pantier, January 2009
 - Preliminary Storm Drainage Plan, Hatton Godat Pantier, January 2009
- Appendix E Plants and Animals
- Wetland, Water and Priority Habitat & Species Determination, Enco Environmental Corporation, August 28, 2008
 - Lacey Gateway Preliminary Tree Protection Plan, Washington Forestry Consultants, August 28, 2006
- Appendix F Cultural Resources
- Cultural Resource Assessment of the Proposed Lacey Gateway Project, Historical Research Associates, August 31, 2006
- Appendix G Transportation
- Lacey Gateway Transportation Analysis, Shea, Carr & Jewell, Inc., January 2009 – updated April 2009
- Appendix H Sanitary Sewer
- Sanitary Sewer Study, Huitt-Zollars, Inc., May 8, 2008
 - Preliminary Sanitary Sewer Plan, Hatton Godat Pantier, January 2009
- Appendix I Document Exhibits/Figures
- Appendix J LTSAAE improvements exhibit

Full copies of the supporting appendices documents can be found in digital pdf format on the cd-rom along with each SEIS. OR they may be obtained from the City of Lacey Community Development Department PO Box 3400, Lacey, WA 98509 (360)491-5642.

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Distribution List

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1. SUMMARY

1.1 Summary of Proposed Action

Hawks Prairie LLC submitted a Site Plan Review/Master Plan application proposing to develop the Lacey Gateway Town Center Master Plan (Master Plan), a multiple phase mixed-use urban town center in the City of Lacey Northeast Planning Area, 28 acres of which has already been developed as a Cabela's retail store. The Master Plan encompasses approximately 250 acres within the Northeast Planning Area Subarea Plan. The specific proposal referred to within this document is the "Lacey Gateway Planned Action" and is in reference to Phase 1 of the Master Plan, which is described in detail on the following pages. Future phases beyond Phase 1 are conceptual and programmatic in nature and are only reviewed in this document for the purpose of providing context for Phase 1 and general concept of future surrounding land uses. Implementation of future phases will be further analyzed through applicable site specific environmental and land use review processes at the time of a specific land use application.

This section provides a summary of the proposed Lacey Gateway Town Center Master Plan and an overview of the environmental review and planned action process. This section also provides a synopsis of the significant impacts, mitigation measures and unavoidable impacts identified through the environmental analysis of Phase 1 of the proposed Master Plan. This section is intended to be a summary and more detailed information will be found in the individual sections of the SEIS.

Through review of the Master Plan within this planned action process, it is important to note the dynamic nature of the plan. The location of buildings, building heights, mix of land uses, streets, etc, that are shown on the site plan are conceptual in nature and are not intended to be site specific or exact. Boundaries, heights, alignment and relative mixes of uses could vary somewhat within the limits analyzed in the SEIS and identified in the Planned Action Ordinance (See Section 1.3). The SEIS therefore may be viewed as establishing maximum limits for elements such as square footage, density, types of uses, etc, with fixed connection points to the adjacent public rights-of-way and utilities. Within these limits, specific internal road alignments, utility infrastructure, development mix, and building height and bulk for specific buildings could vary from what is shown on the Master Plan.

The proposed action consists of three major elements:

1. Approval of Phase 1 of the Lacey Gateway Town Center: A site plan review application to develop a mixed-use town center Master Plan, containing a combination of retail, commercial, office, public/quasi-public, and residential uses, including a program of road, stormwater, and public/private utility improvements that will be an integral part of the development. The site will be developed over an approximate 10-year period. The plans are conceptual in nature and thus illustrate the general type, form, intensity and location of development. The City's action would involve numerous local land use approvals and permits specific to Phase 1, including, but not limited to Master Plan approval, development agreement, site plan review approval, administrative design review, wetland development review, preliminary and final binding site plan, grading permit, civil construction drawings and building permits.
2. The City and the applicant will also enter into a development agreement, as authorized by RCW 36.70B.170 et seq. The development agreement will set forth the standards and other provisions that will apply to and govern the proposed uses within the Planned Action Site. The standards, which would be consistent with applicable development regulations, will address subjects such as, but not limited to, permitted uses, density/intensity, building size, impact fees, design criteria, mitigation measures imposed pursuant to SEPA, phasing of development, and other pertinent provisions. A development agreement will be drafted consistent with the conclusions of the environmental review phase.

3. Adoption of an ordinance by the City Council designating Phase 1 of the Lacey Gateway Town Center as

a “planned action” for purposes of State Environmental Policy Act (SEPA) compliance, pursuant to RCW 43.21C.031(2)(a) and WAC 197-11-164. The planned action will apply to mixed-use developments containing retail, commercial, office, residential, civic and public improvements within the Lacey Gateway Planned Action site as illustrated in the Master Plan and analyzed in the SEIS. The Lacey Gateway Planned Action will apply to the planned action site for 20 years from the date of the ordinance’s adoption. When development projects proposed within the planned action site are determined to qualify as a planned action, no new EIS or threshold determination is required, as the procedural aspects of SEPA have already been completed.

1.2 Location of Proposal

The 250-acre property is located in the Hawks Prairie Planning Area (HPPA), a sub-area in the Northeast Planning Area of the City of Lacey, and is within the area designated as Hawks Prairie Business District by the City of Lacey Comprehensive Plan. The property is generally bounded by Britton Parkway to the north and by Interstate 5 to the south and is located between Carpenter Road NE and Marvin Road NE (see Figure 1.1). The area does not have frontage on either Carpenter or Marvin Roads.

The Lacey Gateway Planned Action site is approximately 120 acres in size and is located to the north of Interstate 5, south of Britton Parkway and east of Gateway Boulevard and the recently opened Cabela’s store.

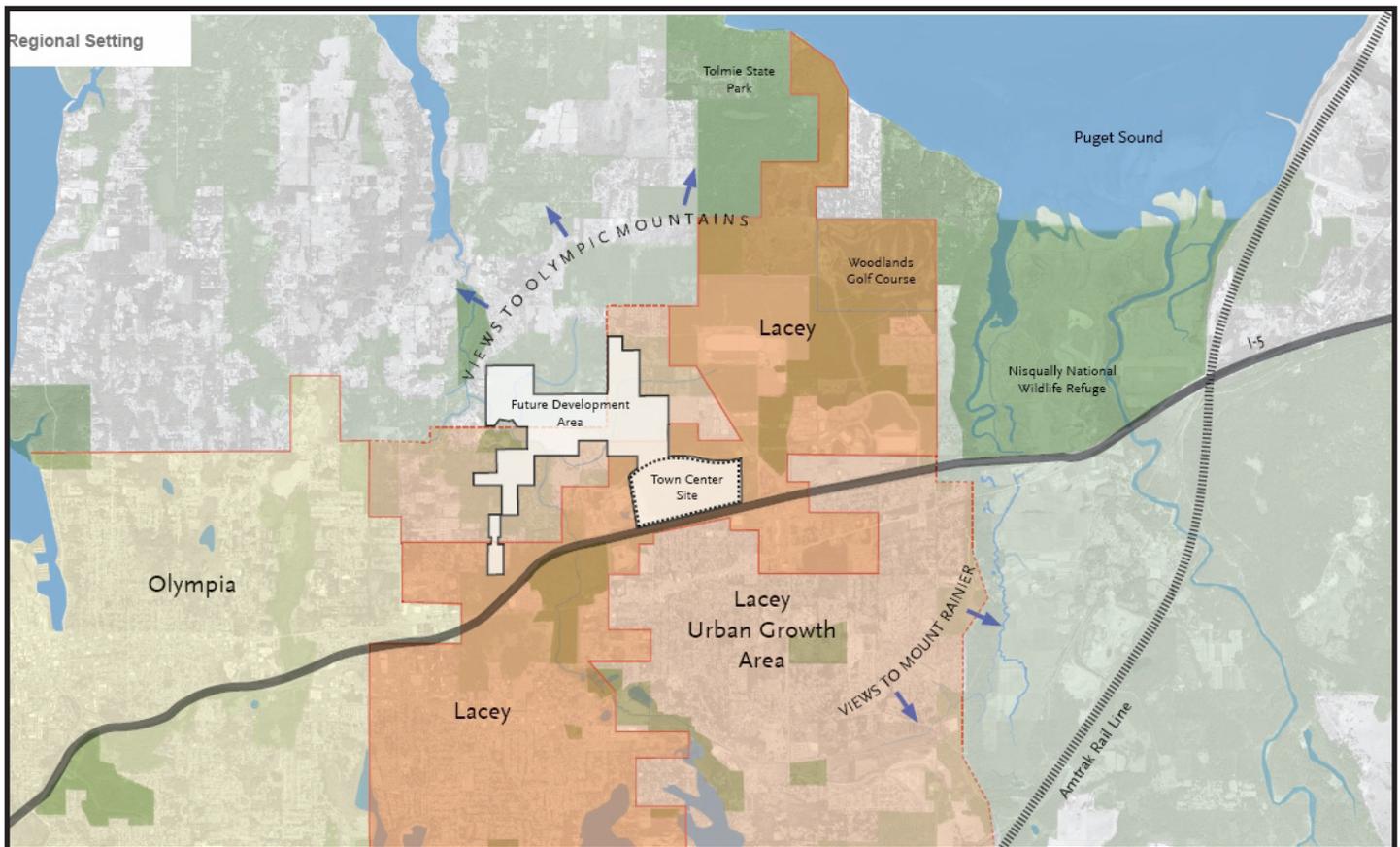


Figure 1.1 - Lacey Gateway Town Center as it relates to the northern Thurston County setting

1.3 Planned Action

The City proposes to designate the study area, Phase 1 of Lacey Gateway Town Center, as a “planned action” pursuant to the State Environmental Policy Act (RCW 43.21.C.021(2)(a)) and implementing rules (WAC 197-11-164). The City of Lacey will follow applicable procedures, described generally below, with the approved planned action and will impose any appropriate development conditions.

There are three basic steps in designating a planned action. Step 1 is an environmental review of projects designated as planned actions to identify and address the project's significant environmental impact. Planned actions are types of site-specific project actions located within a sub-area of a jurisdiction within an Urban Growth Area. Qualifying projects include Master Planned or phased projects that are consistent with and implement a sub-area plan and whose significant environmental impacts have been adequately addressed in an environmental impact statement (EIS) for the GMA and or sub-area plan or a supplemental environmental impact statement (SEIS).

Step 2 is the adoption of a planned action ordinance or resolution by the City. The ordinance or resolution adopting the planned action must describe the types of projects the planned action applies to and how the planned action meets the applicable criteria in the SEPA rules. It also must specifically find that the environmental impacts of the planned action have been identified and adequately addressed in an EIS or SEIS. Furthermore, it should identify specific mitigation measures.

Step 3 is the review of the proposed planned action projects. When an implementing project is proposed, the City must follow review procedures set forth in the SEPA rules. It must first verify that the proposal is the type of project contemplated in the planned action ordinance and that it is consistent with the applicable sub-area plan. It must also determine that the probable significant adverse environmental impacts of the planned action project have been adequately addressed in the planned action SEIS. If the proposal meets this test and qualifies as a planned action, no SEPA threshold determination or further environmental review is required. The City may, however, require additional environmental review, and require additional mitigation, if probable significant adverse environmental impacts were not adequately addressed in the planned action SEIS or if the proposed project does not qualify as a planned action.

1.4 Phased Environmental Review

The City of Lacey is using the "phased environmental review" provisions as authorized under the State Environmental Policy Act, WAC 197-11-060(5). Phased review allows agencies and the public to focus on issues that are ready for decision and exclude from consideration issues that have already been decided or are not yet ready for decision. The sequence of a phased review of a project is from a broad scope to a narrow scope. This allows the scope of the environmental review to coincide with the planning and decision making process. Therefore, as the planning and decision process becomes more specific and detailed, the scope of the environmental documentation becomes progressively narrower and focused.

The envisioned development of the Hawks Prairie Business District, including the Lacey Gateway Planned Action site, has been evaluated in numerous studies and environmental documents. These documents, listed below in chronological order, have provided a base of information for planning and implementation programs. They also provide context for the Lacey Gateway Planned Action Site.

- Northeast Area Planning Element (1992)
- Determination of Non-significance–Northeast Area Planning Element Environmental Assessment (1992)
- City of Lacey and Thurston County Land Use Plan for the Lacey Urban Growth Area (October 1994)
- Environmental Impact Statement–City of Lacey and Lacey Urban Growth Comprehensive Plan (Final 1994, Draft 1994)
- 1994 City of Lacey Transportation Plan
- Northeast Area Transportation Study (1996)
- City of Lacey Northeast Area Local Improvement District Expanded Environmental Checklist (1997)
- Market Analysis for the Lacey Central Business District and Hawks Prairie Business District (January 1997)
- City of Lacey Regional Drainage & Planning Report for: Northeast Area Drainage Analysis & Land Use

Analysis Study, (July 1, 1997)

- Determination of Non-significance–Ordinance No. 1054–Amendments to Chapter 16.37 of the Lacey Zoning Code, Hawks Prairie Business District zone. (1997)
- Hawks Prairie Tree and Vegetation Inventory and Analysis (May 29, 1997)
- 1998 City of Lacey Transportation Plan
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- City of Lacey and Thurston County Land Use Plan for the Lacey Urban Growth Area (2004)
- Determination of Non-significance - City of Lacey and Thurston County Land Use Plan for the Lacey Urban Growth Area (2003)
- Mitigated Determination of Non-significance – SPR 06-316, Cabela’s Retail Store Site Plan Review

The environmental impacts that have been identified in the above listed documents have been sufficiently identified and addressed by the previous environmental documentation. Consistent with the purpose and content of the supplemental EIS per WAC 197-11-620(1), it is not deemed necessary to discuss them further in the Lacey Gateway Planned Action SEIS.

This DSEIS is a supplement to the Environmental Impact Statement for the City of Lacey and Lacey Urban Growth Area Comprehensive Plan (1994) and existing environmental documents incorporated into this SEIS, with more specific analysis of the Lacey Gateway Planned Action site. The purpose of this SEIS is to specifically identify and review the probable significant impacts associated with Lacey Gateway Planned Action that have not been addressed by the planning and environmental documentation listed above.

Also, the City will rely on its substantive authority described in LMC 14.24.160 and adopted plans and regulations to mitigate significant adverse impacts including those adopted by reference in LMC 14.23.160.D.3 and listed below:

- a. Lacey zoning ordinance;
- b. Lacey Comprehensive Plan;
- c. Lacey platting and subdivision ordinance;
- d. Lacey six-year street plan;
- e. Shoreline master program for the Thurston region;
- f. Thurston Regional Transportation Plan;
- g. The City of Lacey Buildings and Construction Code as set forth in the Lacey Municipal Code, Chapters 14.02 through 14.20;
- h. Lacey bikeway plan;
- i. The City’s Traffic Mitigation and Concurrency Regulations as set forth in the Lacey Municipal Code, Chapter 14.21;
- j. The City of Lacey’s environmental regulations as set forth in the Lacey Municipal Code, Chapter 14.26 (Shoreline Master Program), Chapter 14.28 (Wetlands Protection), Chapter 14.30 (Removal of Top Soil), Chapter 14.31 (Drainage Discharge), Chapter 14.32 (Tree and Vegetation Protection and Preservation), Chapter 14.33 (Habitat Conservation Areas Protection), Chapter 14.34 (Flood Hazard Prevention), Chapter 14.36 (Critical Aquifer Recharge Areas Protection), and Chapter 14.37 (Geologically Sensitive Areas Protection);
- k. City of Lacey Development Guidelines and Public Works Standards as adopted by the Lacey Municipal Code Chapter 12.28;

l. The Capital Improvement Plan of the North Thurston Public Schools and means for mitigating impacts

upon such plan;

- m. The transportation plans of Thurston County, the City of Olympia and the City of Tumwater, and allowed means of mitigating impacts of development upon such plans;
- n. The City's requirements for the undergrounding of communication facilities as set forth in the Lacey Municipal Code, Chapter 12.22.

Under SEPA, it is not necessary to conduct detailed environmental review or require mitigation of applicants if regulations adopted pursuant the Growth Management Act (GMA) adequately mitigate for identified impacts (RCW 43.21.C.240 and WAC 197-11-158).

The Lacey Gateway Town Center Master Plan includes a build-out scenario identified as Future Phases and describes additional office, residential and commercial uses that may or may not occur in multiple phases, depending on market conditions. The build-out scenario is not ready for decision at this time. At the time a development proposal within the build-out scenario is ready for decision, the City of Lacey will continue to use the phased environmental review approach and will apply the applicable land use and environmental review procedures, including a planned action if deemed appropriate at the time development phases are proposed.

LACEY GATEWAY MASTER PLAN

TOWN CENTER TYPICAL EXHIBIT
LACEY, WASHINGTON



Figure 1.2 - Lacey Gateway Town Center conceptual site plan

1.5 Scope of Proposal

The Lacey Gateway Town Center Master Plan consists of approximately 250 acres of land in the northeast area of the City. The project site is within the Hawks Prairie Business District (HPBD), located north of I-5, west of Marvin Road, south of Britton Parkway and east of Gateway Boulevard. A portion of the site is partially cleared and a Cabela's retail store is located to the west of the planned action site, on approximately

28 acres in the southwesterly portion of the property. The Lacey Gateway Town Center will be designed with an interconnected road system that affords connectivity to the core and access to other areas of the site on the periphery. Gateway Boulevard has recently been constructed, providing access to Cabela's from Britton Parkway. A portion of "Main" Street has been constructed along Cabela's north frontage, which will connect with the internal road system serving both the core and the periphery. The internal roadway system will provide connectivity to the east property line where it will connect with the Main Street extension from Marvin Road to the eastern property boundary. Main Street is also expected to extend to the west property

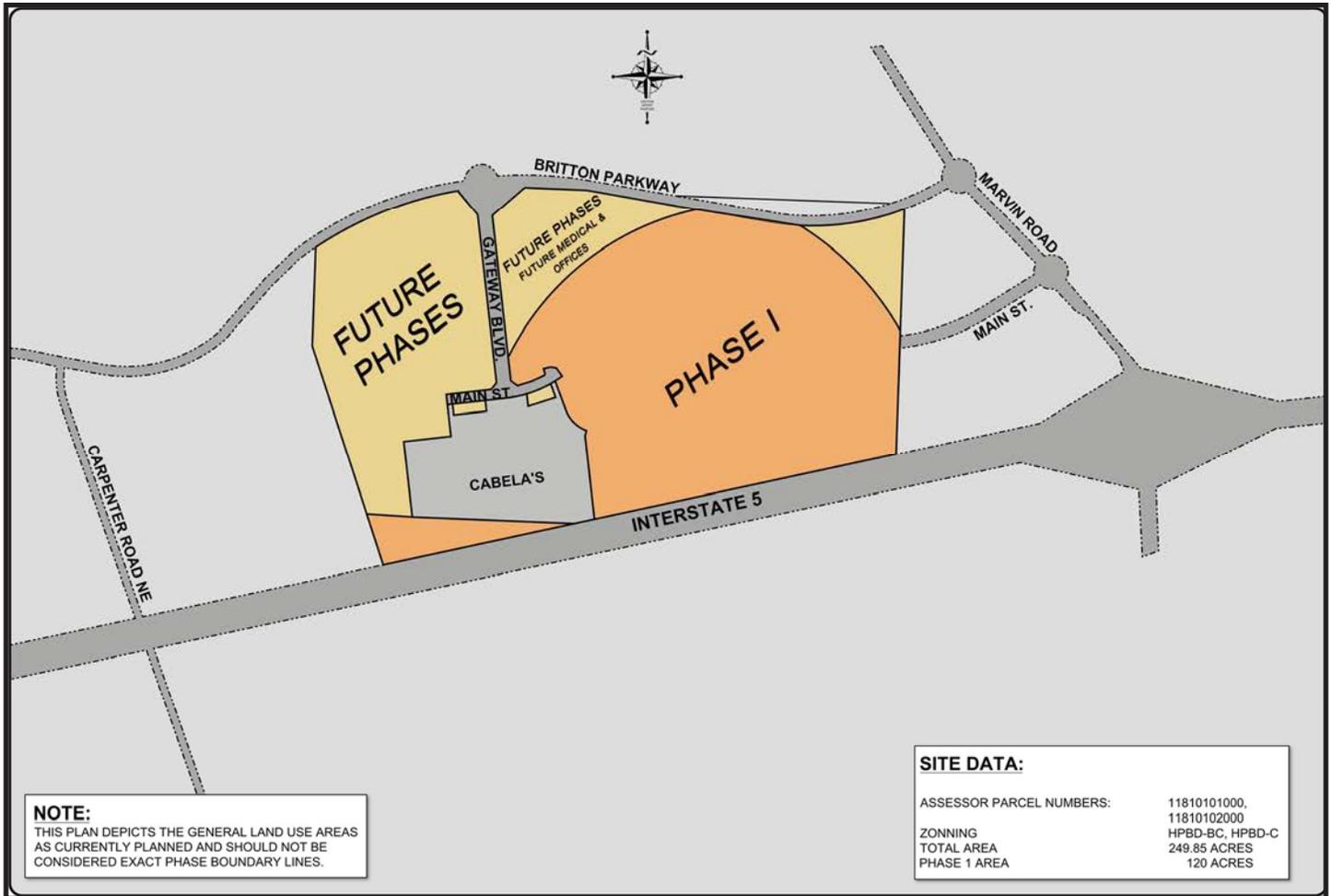


Figure 1.3 - Lacey Gateway Town Center phasing

boundary as the Master Plan is developed.

Of the 250 acres included in the Lacey Gateway Town Center Master Plan, the Lacey Gateway Planned Action site (Phase 1) consists of approximately 120 acres. Approximately 30 acres will be used for a mix of public or private interconnected access roads, leaving a net development area of approximately 90 acres. The applicant is proposing to develop Phase 1 as an urban town center that consists of four distinct types of land uses; retail/commercial, office, residential and civic uses. The intent of the development is to create an attractive mixed-use urban center that is active seven days a week throughout the year.

Phase 1 development is to provide the "core" of a mixed-use town center as envisioned by the City's past planning efforts. This phase will consist of 1,100,000 square feet of commercial and retail space, 100,000 square feet of office space, and 500 units of housing. Additionally, areas for civic uses will be incorporated into the site design to meet community needs.

Table 1.1 Lacey Gateway Town Center Land Use

Land Use	Phase 1	Future Phases	Build-out
Retail/Commercial	1,070,000 s.f	930,000 s.f	2,000,000 s.f.
Office	100,000 s.f	900,000 s.f	1,000,000 s.f
Civic Uses (Library)	30,000 s.f	50,000 s.f	80,000 s.f
Total Non-Residential	1,200,000s.f	1,880,000 s.f	3,080,000 s.f
Residential	500 units	*1	*1
Park/Open Space	28 acres	28 acres	28 acres
Parking Stalls²	6,430	11,440	17,870

Commercial/Retail/Office

The primary focus of the “town center” portion of the development will be retail blocks centered around a public plaza, pedestrian boulevard or open space, with offices or housing located on upper floors. Streets within the development are designed to enhance a pedestrian friendly environment, with on-street parking, attractive sidewalks, and storefronts built to the front of the property to better define the public space.

Building pads located toward the periphery of the site are also incorporated into the site plan in order to accommodate types of development with larger stand-alone footprints and different site requirements than uses located in the core. Despite the different site requirements of various tenants, the Lacey Gateway Town Center will be designed to provide connectivity between adjacent uses in order to achieve a cohesive and well integrated urban center.

Protected pedestrian corridors will provide connections to all portions of the center. Pedestrian corridors within the core retail blocks will provide protection through use of marquees, awnings or other techniques that encourage integration with the entire site. In order to provide connectivity between the periphery building pads and the core, pedestrian corridors will be conveniently located. Pedestrian corridors serving periphery buildings should also be designed to invite year round use and pedestrian safety when crossing parking areas or drive lanes.

The retail square footage identified in the above table is inclusive of up to 270 rooms of hotel space (approximately 87,000 s.f.) that is planned to be constructed in Phase 1 of the development. The hotel(s) will be designed and located in the core of the town center to aid in establishing the urban environment and vertical scale. The hotel types may also include conference rooms and other meeting spaces. The mixture, density and type of retail/commercial uses that will be developed within Phase 1 will be consistent with what is identified within the Hawks Prairie Business District Zoning Chapter, LMC 16.37.

Phase 1 offices are primarily intended to contribute to the mix of uses within the town center and will include professional and medical offices. Later phases will allow for the creation of an “office park” area along Britton Parkway, where opportunities for larger corporate offices will be possible.

Housing

The 500 units of housing anticipated in Phase 1. Currently the HPBD Zoning District restricts residential units to upper floors. The applicant has requested approval to allow a mixture of ground floor and upper story units to provide a variety of housing options to complement the town center. The City’s review of this request will be conducted through the associated development agreement and planned action process. The vertical massing of these units and incorporation of office and retail on ground floors could enhance the desired mixed-use environment. It is anticipated that most of the housing units will be built as condominiums; however, some rental housing may also be built. All of the housing constructed will be sold or rented at market rate.

Open Space

A variety of open spaces will be provided within the Master Plan to support the live-work-play activities of the new city center. The types of open spaces include greenbelts, greenways, public market and multi-use plazas and are described as follows:

The greenbelts are open space elements that are passive open spaces, meaning they are not intended for formalized activities. Their purpose is to provide screening and a northwest aesthetic character to the town center. They will be located along Interstate 5, a minimum of 40 feet in width, and along Britton Parkway at least 50 feet in width, both greenbelts generally meandering in size from their respective minimum widths. The greenbelts will retain as much of the existing tree and groundcover as possible. When appropriate, supplemental plantings will be added to maintain the native character of the site.

The centerpiece of the open space is the "Central Greenway", a ±6.5 acre greenbelt in a corridor that runs roughly east to west through the site. The native vegetation will be protected and retained within this greenway and, in appropriate locations, additional native plantings will supplement the landscaping. The greenway is also intended to supply walking and cycling trails through the site, providing opportunities not only for recreation but also for alternative routes of travel for people to move throughout the center and enhance the pedestrian-friendly nature of the Town Center.

The public plaza element will generally be located within the core of the town center. The public plaza is also an area where festivals, entertainment, market and other community events may be held providing a central hub and gathering point for the community.

The multi-use public plazas will provide nodes for a wide variety of public gatherings throughout the center ranging from meeting, gathering, and resting, in both organized and informal settings. These plazas will range in size and will be strategically located in front of civic and entertainment spaces as well as in the core of the center.

Civic uses

The applicant has worked closely with the City of Lacey to provide opportunities within the development for civic uses. Up to ten acres of land could be developed within the Lacey Gateway Planned Action site for the purpose of locating community facilities that enhance and complement a town center environment. Examples of such uses may include the construction of a library branch, activity center, performing arts center, police substation, farmers market or public park.

Street Network

The main internal street network for Phase I will utilize an interconnected design that will distribute traffic throughout the town center and maintain strong connections that serve to tie the Main Street extension located east of the project between Marvin Road and the east property boundary and Main Street located on the northern border of Cabela's property. Main Street will also extend to the western property boundary to complete the east-west connection. Two north/south collectors, "Central Blvd" and "Eastern Blvd" will extend from the Main Street north to Britton Parkway. Local access streets will then interconnect the collectors providing access to interior development blocks and create a pedestrian scale environment. The intent of the street network is to create multiple entry and exit points to the Master Plan, dispersing rather than concentrating trips generated by the proposed Master Plan. The primary road corridors will implement roadways identified within Lacey's Transportation Element of the Comprehensive Plan as key to accommodate the development potential of the Hawks Prairie Business District properties.

Utilities

The public sanitary sewer and domestic water system will be systematically expanded as mains are extended into and throughout the site as development phases are implemented. A new public reclaimed water utility is being developed by the City in an effort to reduce demand on potable water supplies. The applicant will implement this new utility by utilizing reclaimed water for non-potable uses such as irrigation and toilets. As a result, the reclaimed water infrastructure will be developed and expanded throughout the site initiating this new utility. A comprehensive stormwater system will also be developed to serve the entire 250 acres

to maximize block development potential. Stormwater will be conveyed through a system of mains that are connected to treatment and infiltration basins located along the site's southern boundary.

This mixed-use concept proposed as a planned action project will be consistent with the City of Lacey Comprehensive Plan and applicable implementation ordinances relating to the Hawks Prairie Business District (HPBD). The HPBD encourages the development of an integrated, planned community where people will want to live and work.

1.6 City of Lacey Vision

1.6.1 Northeast Area Planning

The City of Lacey has always envisioned the Hawks Prairie Business District as an integrated, planned community where people will live and work. The goal of allowing the development of residential and compatible business uses in close proximity to each other is to provide for potential development that achieves originality, flexibility, and innovation in site planning, thus creating an area with distinctive character that includes such things as focal points, open space features, innovative landscape and hardscapes, special site planning and prominent building design considerations.

The City of Lacey has been evaluating land use concepts for the northeast area for more than sixteen years. The first large effort resulted in the Northeast Area Planning Element of the City of Lacey Comprehensive Plan, adopted by the City in 1992. Since then, a series of planning efforts focusing on the Hawks Prairie Business District provided a foundation for guiding land use decisions in order to anticipate and influence the orderly and coordinated development of the area and achieve the City's vision. The following is a summary of the primary planning and implementation actions facilitated by the City of Lacey over the past seventeen years for the Northeast Planning Area and Hawks Prairie Business District:

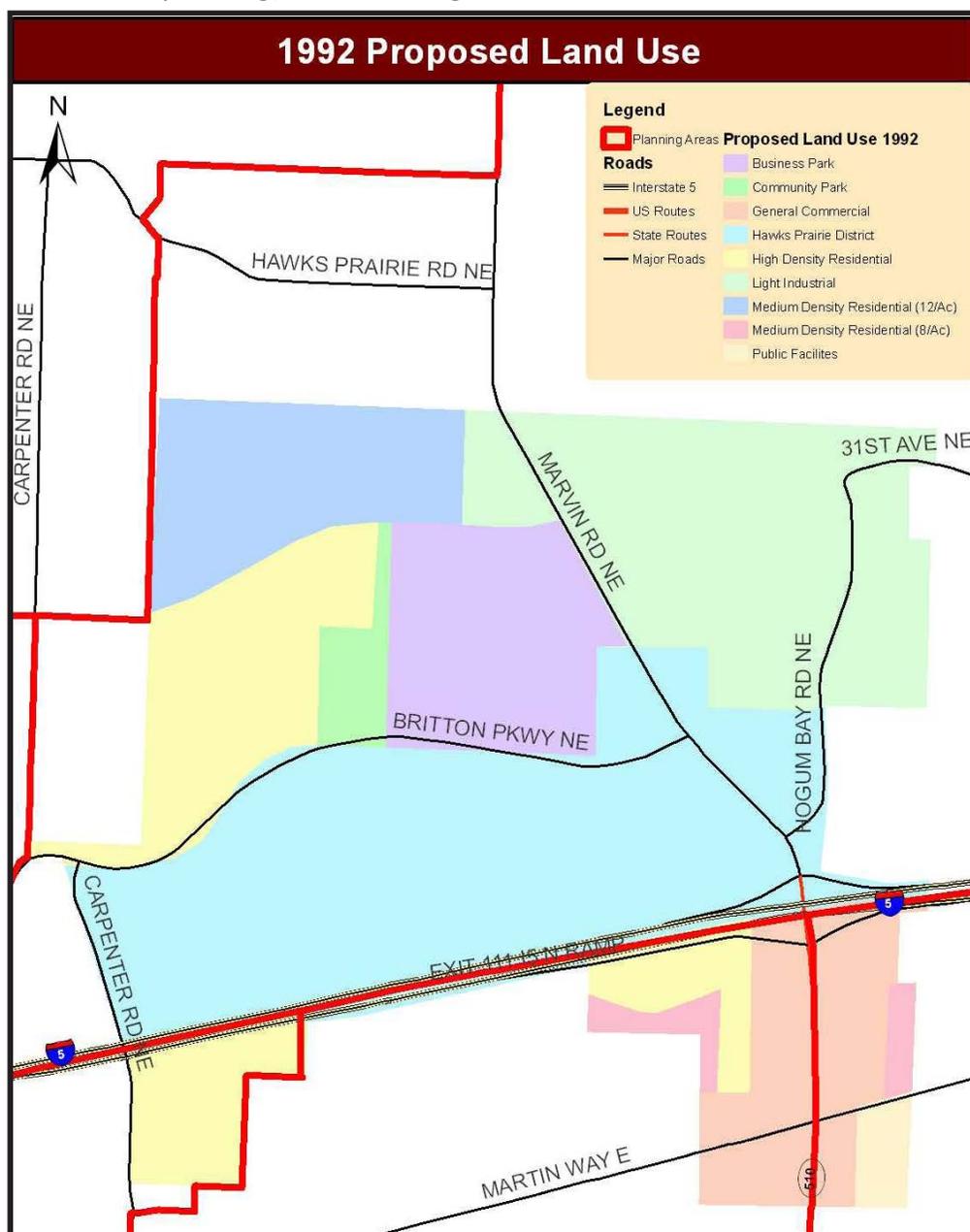


Figure 1.4 - 1992 Northeast Area Planning Element proposed land uses

1992 Northeast Area Planning Element

The purpose of the Northeast Area Planning Element was to develop a model, general plan for an area of the City that was expected to experience a high rate of growth and development. The planning area, located in the northeast part of the City, consisted of approximately 970 acres. At the time, a great majority of the planning area was undeveloped and zoned light industrial. City services such as sewer and water were made available in 1990 to properties in the Northeast Area through the formation of a Local Improvement District facilitated by the City.

At the onset of developing a long-range land use plan for the northeast area, the City developed a vision for the area. The City's stated desire was that this, "area (970 acres) develop as an aesthetically attractive, high quality employment center with a moderate mixture of other uses to complement the development. It is the goal of the City that this area and its subsequent development convey to the public, business community and visitors a sense of vision, forethought, imagination and aesthetic and environmental sensitivity."

The result of this effort was a recommendation of a land use plan demarcating the study area with eight districts, consisting of Hawks Prairie Business District, General Commercial, Public Facilities, Community Park, Business Park, Light Industrial and Moderate and High Density Residential.

The most significant change was the creation of the Hawks Prairie Business District (HPBD) classification. A mixed-use classification, the HPBD is intended to support residential, regional/commercial, business, retail mix, bank, office and corporate facilities. The HPBD designation encompasses approximately 550 acres, the majority of which is located between Carpenter Road and Marvin Roads, a portion of which is the Lacey Gateway Planned Action site.

This designation promotes a dense mixed-use pattern achieving the goals of the Growth Management Act by providing opportunity for an intense urban node to be developed with jobs, commercial facilities, residences, and recreational activities close together. Land uses that were proposed to be permitted in the Hawks Prairie District were considered complimentary and would promote mixed-use developments resulting in urban environments more relevant and satisfying to current and future human needs. Those uses listed in the plan were subsequently incorporated into the Hawks Prairie Business District implementation ordinance, LMC 16.37. In addition, the Northeast Area Planning Element promoted the development of design guidelines to shape the character and quality of land use and development within the planning area.

City of Lacey and Thurston County Land Use Plan for the Lacey Urban Growth Area Originally developed in 1994, this plan was the City's first plan under the State of Washington Growth Management Act of 1990 (GMA). The plan segregated the urban growth area into eight planning areas. The Lacey Gateway Planned Action site is located in the Hawks Prairie Planning Area, which also includes the Meridian Campus and Hawks Prairie Planned Communities. The 1994 plan incorporated by goal and policy the vision, goals and policies contained within the 1992 Northeast Area Planning Element. The 1994 plan further acknowledges the Northeast Area Planning Element as the guiding influence for development within the Hawks Prairie Planning area through the policy statements listed below:

- A. Goal: Have Hawks Prairie Planning Area develop consistent with the vision provided in Lacey's Northeast Area Plan and the design checklist developed in the late 90's.
 1. Policy: The goals and policies adopted in Lacey's Northeast Area Plan are considered applicable to the entire Hawks Prairie Planning area and are hereby referenced and adopted in this document.

In the year 2003, the City of Lacey completed the first update to the land use plan, which is required every ten years. This was an opportunity for the City to review the policies and land use decisions established in

the 1994 plan against the actual growth and development experience of the first ten years. As part of the ten-year review, the update to the plan also determines by policy how the City will accommodate forecasted growth of the coming twenty years, while reinforcing the City's vision. Through this process, the City of Lacey found that the primary goals and policies of the 1994 plan have been very successful in terms of residential growth, economic development and urban design, while providing for both natural and developed open spaces. Specific to the Hawks Prairie Planning Area, the 2003 update reinforces the relevancy of the Hawks Prairie Business District and the goals of the 1992 Northeast Area Planning Element.

1997 Implementation Ordinance (1054 03-06-97)

In September of 1996, the City began a review of the Hawks Prairie Business District to determine how the area would be developed over the short and long term. Since the Hawks Prairie Business District area had been identified as a key component of Lacey's economic future, this was an opportunity for the City to fully review the nuts and bolts of how development in the zone and among various properties would work. This strategic implementation plan reserved areas of the HPBD for primarily retail/commercial. Of the 222 acres in the Lacey Gateway project, approximately 34 acres carry the "commercial" designation to be reserved for retail/commercial land uses. The intent of the retail commercial reserve was to assure the City that enough retail land in the City as a whole is available to keep the City economically viable. The remainder of the land, approximately 188 acres, is more mixed-use in the "business/commercial" designation, the intent of which was to allow a mix of uses but not restrict retail commercial. By blending these designations, the City will see a significant increase in lands reserved for retail/commercial. The process involved property owners, consultants with expertise in economic development and urban design, City staff and elected officials. They worked through design charettes and public meetings to develop recommended standards to implement the vision of the Northeast Area Planning Element. The amendments to LMC 16.37 addressed permitted uses, site requirements, site design standards and open space standards. The amendments to LMC 16.37 were adopted in March of 1997.

2000 Design Guidelines Ordinance (1139 10-16-00):

The vision for the HPBD was refined in October of 2000 by the adoption of design standards, a design review checklist and conceptual site plans graphically showing the City's vision. This further clarified the urban form to be achieved in the Hawks Prairie Business District zone. The City began the effort of refining design standards for the HPBD by working with Freeman, Tung & Bottomley, a consulting firm hired by the City to review the City's vision for the HPBD. Through several design charettes with property owners, planning commissioners, council members and staff, the recommended guidelines were developed with conceptual site plans to graphically state the City's vision for the HPBD.

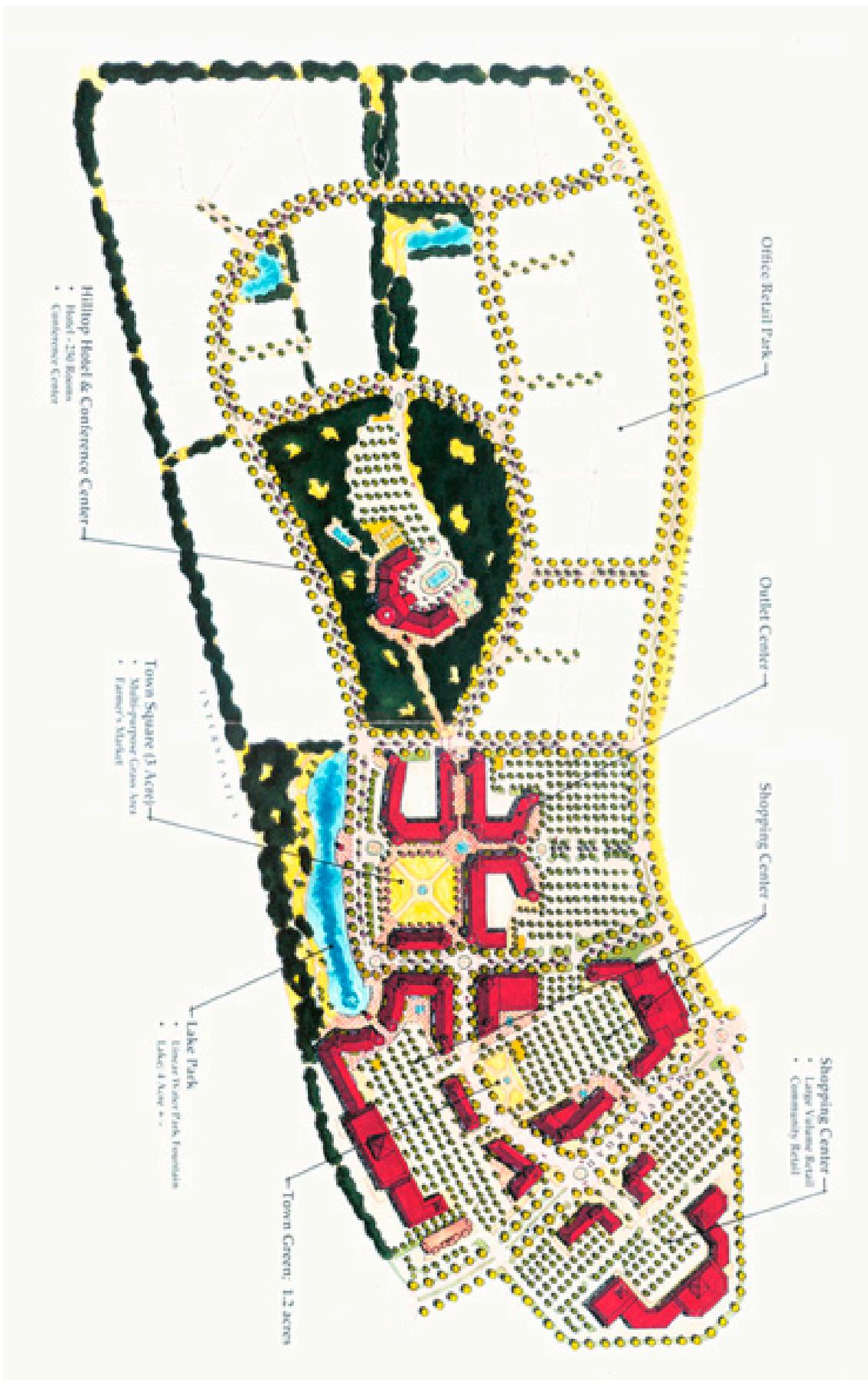


Figure 1.5 - Freeman, Tung & Bottomley HPBD Concept Plan 1

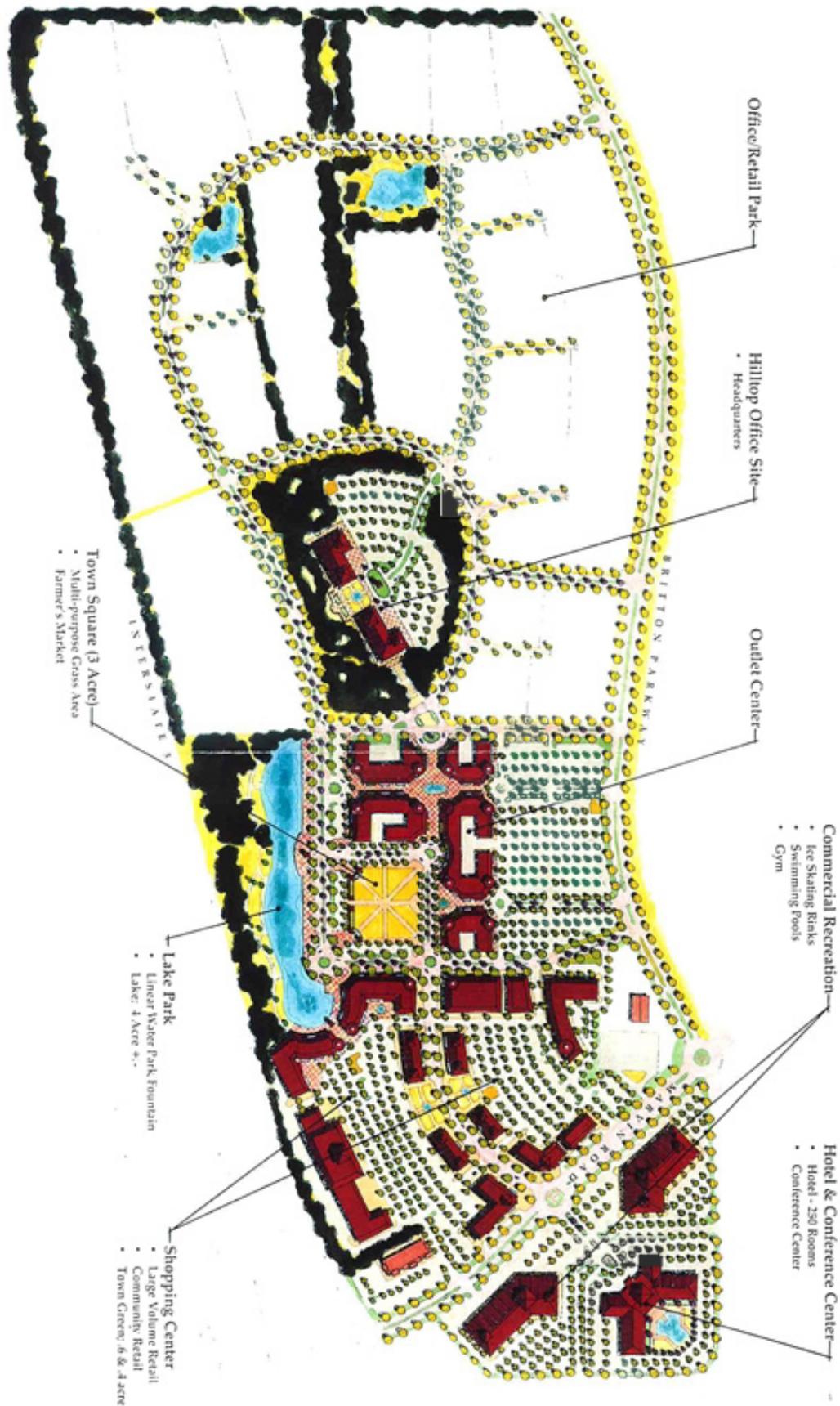


Figure 1.6 - Freeman, Tung & Bottomley HPBD Concept Plan 2

1.7 Environmental Impact and Mitigation Summary

A summary of potential impacts and mitigation measures for Phase 1 and build-out of the Lacey Gateway Town Center is provided below. These items are fully discussed in the following sections of this document and in the technical appendices, and are only briefly summarized in Table 1-2 below.

Table 1-2 – Summary of Potential Impacts and Mitigation

Potential Impacts	Mitigation Measures
GEOLOGY AND SOILS	
Significant grading will be required to balance the site.	<ul style="list-style-type: none"> • A comprehensive grading plan will be required, including a geotechnical report. • Cut and fill on site will be balanced to maximum extent possible. • Grading will be limited to the boundaries of Phase 1. • Staging, lay down and stockpile areas will be screened from view. • All tree protection, greenways, natural open space and sensitive areas will be protected by chain-link fence and/or other appropriate methods and signage.
Construction will create potential for erosion to occur.	<ul style="list-style-type: none"> • Maximum roadway grade of 3% to 5%. • Stockpiled topsoil will be protected to avoid erosion, dust or other impacts. • The City will apply its development regulations pertaining to grading and erosion control.
Project may generate excess material.	<ul style="list-style-type: none"> • If any material is exported, a material export plan will be required.
Significant Unavoidable Adverse Impacts: No significant unavoidable adverse impacts are expected to result from the proposed grading.	
AIR QUALITY	
Construction of new roads and buildings will have short term impacts to air quality, such as dust and exhaust.	<ul style="list-style-type: none"> • Dust suppression techniques will be required. Water trucks will be kept on site at all times. • Construction vehicles and delivery trucks will be routed and scheduled to avoid peak travel times. • Construction vehicle emissions will be reduced by the limitation on the grading to balance the materials onsite. • The City will apply development regulations pertaining to air quality and building construction.
The full road network will not be constructed until build-out.	<ul style="list-style-type: none"> • Olympic Region Clean Air Authority regulations will be met during construction and the operation of uses associated with Phase 1.

Potential Impacts	Mitigation Measures
<p>At build-out, approximately 6.8 miles of new roads and new peak hour vehicle trips will result in increased vehicle emissions.</p>	<ul style="list-style-type: none"> • Prior to development of Phase 1, the proponent and Intercity Transit will coordinate with transit service to Phase 1. • The City will review the prohibition of park and rides and make appropriate revisions to City codes to promote transit alternatives. • Transportation Demand Management strategies will be incorporated into design for Phase 1. • All major employers will develop and implement commute trip reduction (CTR) programs. • The environmental and land use review will consider the potential for increased transit opportunities and other TDM strategies. • Higher densities proposed and efforts to promote multi-modal transportation options will have more potential for success, thereby potentially limiting emissions resulting from the project.
<p>Significant Unavoidable Adverse Impacts: No significant unavoidable adverse impacts to the air are expected to result from the Lacey Gateway project.</p>	
<p>WATER RESOURCES: SURFACE WATER</p>	
<p>Clearing and grading during construction increase the risk of erosion and sedimentation.</p>	<ul style="list-style-type: none"> • Install a stabilized construction entrance at each construction entrance to the site. • Wash down roads daily to remove excessive dust may be required. • Centralized equipment marshalling and containment area will be provided onsite. • The City will apply its development regulations pertaining to soil erosion. • Surface parking lots in some portions of the project may be converted to underground or above ground parking structures.
<p>WATER RESOURCES: GROUNDWATER</p>	
<p>The project area is located in a critical aquifer recharge area.</p>	<ul style="list-style-type: none"> • The City will apply criteria for protection of critical aquifer recharge areas. Spill prevention and contamination will be considered during project review. • The City will apply development regulations pertaining to stormwater management and wellhead protection areas.
<p>The wellhead protection area for a future well north of 29th Avenue could be located within the project area in the future.</p>	<ul style="list-style-type: none"> • Uses within the designated ten-year time of travel zone which involve hazardous materials will submit documentation that all known, available and reasonable methods of prevention, control and treatment (AKART) will be implemented. • If undocumented wells are found during construction, the wells will be assessed and either protected or properly abandoned.
<p>An accidental spill or leak of potential water polluting materials could impact groundwater resources.</p>	<ul style="list-style-type: none"> • An Integrated Pest Management Plan (IPMP) will be required for all open space, landscape and community areas in Phase 1.

Potential Impacts	Mitigation Measures
The project will increase the demand for potable water.	<ul style="list-style-type: none"> • Water availability for Phase 1 is committed at 227,300 gallons per day to serve the 1,000,000 square feet of retail/commercial/office and 500 residential units. • The project will utilize reclaimed water for non-potable purposes. • The proponent will coordinate with City of Lacey Public Works to secure additional water availability beyond the 227,300 gpd allocated for Phase 1. • The environmental review associated with any Comprehensive Plan amendment application for the build-out scenario will include a water demand analysis.
WATER RESOURCES: STORMWATER	
Impervious surfaces will increase with development.	<ul style="list-style-type: none"> • Upon completion of construction, in-situ stormwater infiltration rates will be determined and compared to the design rate for each infiltration facility. • The Low impact Development Technical Guidance are incorporated into Phase 1. • A tabulation of impervious and pervious area constructed shall be maintained as each project within Phase 1 is constructed to ensure design thresholds of the receiving stormwater facilities are not exceeded. • The infiltration facilities proposed underneath the parking lot of the big box area in the southeast portion of Phase 1 will be installed at the time the site is initially developed. • Stormwater facilities will be sized in accordance with <u>Lacey standards</u>.
As trees and vegetation are removed, runoff increases.	<ul style="list-style-type: none"> • High quality stands of specimen trees located within the greenbelt along I-5 will be incorporated in the <u>stormwater system design</u>.
Clearing and grading during construction increases the risk of erosion and sedimentation.	<ul style="list-style-type: none"> • Construction will be conducted in accordance with the Lacey Gateway Preliminary Drainage and Erosion Control Report. • A licensed geotechnical engineer will perform an analysis of the stormwater facility locations and provide recommendations for appropriate vertical separation between the facility base and a restrictive layer for every foot of water stored in the facility based on site specific conditions and the final grading plan. • A Stormwater Pollution Prevention Plan (SWPPP) will be prepared prior to and implemented during grading activities on site. • The City will apply its adopted 1994 Edition of the Drainage Design and Erosion Control Manual to stormwater generation, facilities and infrastructure to mitigate impacts associated with stormwater.

Potential Impacts	Mitigation Measures
<p>Significant Unavoidable Adverse Impacts: There will be a significant and unavoidable increase in demand for potable water resulting from the proposal. Development will result in an increase in groundwater being infiltrated due to loss of existing vegetation and increase in impervious area. No significant unavoidable impacts to groundwater quality, surface water or stormwater are anticipated by development of Lacey Gateway.</p>	
<p>PLANTS AND ANIMALS</p>	
<p>Clearing and grading for construction of roads and other infrastructure will result in removal of trees and vegetation. Phase 1 grading will impact existing trees and will clear all vegetation except the central greenway open space areas and perimeter greenbelts.</p>	<ul style="list-style-type: none"> • A tree and vegetation protection and landscape greenbelt at a minimum width of 40 feet will be provided between I-5 and the frontage road, and 50 feet between Britton Parkway and interior streets and other improvements. • The central greenway will be planted with native vegetation where existing vegetation is thin. • An annual hazard tree evaluation will be conducted. • The City will apply its development regulations pertaining to wetland, tree, vegetation, and habitat conservation protection.
<p>The wetland delineation identified four wetlands within the Phase I area. These wetlands are proposed to be relocated onsite.</p>	<ul style="list-style-type: none"> • The applicant will provide a compensatory wetland replacement plan in compliance with City Regulations. • The City will process the wetland development permit prior to or concurrently with the grading permit. • The City will apply its development regulations pertaining to wetland, tree, vegetation, and habitat conservation protection.
<p>The two wetlands within the future build-out are proposed to be filled. As part of the regional grading plan these wetlands will be relocated to the same centralized location as the wetlands located within the boundaries of Phase 1.</p>	<ul style="list-style-type: none"> • To maximize the value of the compensatory wetland replacement proposed, all compensatory wetlands should be consolidated into one large constructed wetland and sized accordingly. Creating one large compensatory wetland will increase viability, and improve both function and value of the wetland. • To limit future disturbance to the combined compensatory wetland the entire compensatory wetland shall be constructed during Phase I. • Disturbance of wetlands in future phases will not occur until grading of applicable phase. • The City will apply its development regulations pertaining to wetland, tree, vegetation, and habitat conservation protection.
<p>Significant Unavoidable Adverse Impacts: No significant unavoidable adverse impacts to fish, wildlife, or threatened or endangered species are anticipated from the project.</p>	
<p>CULTURAL RESOURCES</p>	
<p>There is potential for unknown and undiscovered archaeological resources to be discovered.</p>	<ul style="list-style-type: none"> • If archaeological resources are discovered during construction site earthwork, all activity in the immediate vicinity of the find will cease pending notification and consultation with local tribes.

Potential Impacts	Mitigation Measures
LAND USE	
<p>The proposed residential component of the Lacey Gateway Town Center reflects a substantial increase in the number of residential units to be located on the property.</p>	<ul style="list-style-type: none"> Residential units in Phase 1 of Lacey Gateway will not exceed 500 units. The City will apply its development regulations pertaining to zoning and land use to mitigate impacts associated with the intensification of land uses. Additional housing above those in Phase 1 will require a Comprehensive Plan amendment. An analysis of the impact of proposed higher densities and increased multi-family uses on the UGA will be provided. A market study will be provided to the City in order to determine if additional residential demand exists that would support a Comprehensive Plan and zoning text amendment.
<p>The Northeast Area Plan established an open space overlay and is intended to facilitate a connected and comprehensive open space network.</p>	<ul style="list-style-type: none"> A minimum 25 acres of open space area will be set aside and developed within the Master Plan. A greenbelt, 50 feet in width, incorporating and preserving existing trees and native ground cover, will be provided along the frontage of Britton Parkway. A greenbelt, at least 40 feet in width, will be provided along the frontage of I-5. Trees to be retained will be crown cleaned as needed. The Master Plan will comply with the City's tree tract requirements. Greenbelt areas will be protected from grading and construction activities by chain-link fencing and/or other appropriate methods. If the I-5 greenbelt and adjacent stormwater facilities are included in open space calculations for the project, they will be landscaped and maintained in a manner consistent with the intent of the open space areas. Future projects will incorporate open space areas and plazas as shown in the Master Plan.
<p>Impacts to visual character will result primarily from conversion of vacant land to urban uses.</p>	<ul style="list-style-type: none"> Architectural standards for the Master Plan will be submitted to the City prior to site plan review or other land use approval of any development.
<p>A total of 6,430 parking spaces are proposed to serve the land use needs for Phase 1.</p>	<ul style="list-style-type: none"> To reduce the amount of surface parking, structured parking will be incorporated into the site and building design as future phases are developed, including converting surface parking into structured parking.
<p>Significant Unavoidable Adverse Impacts: There are no unavoidable significant adverse impacts to land use anticipated to occur as a result of the proposed project.</p>	
TRANSPORTATION	
<p>Development will result in a significant increase in traffic volumes on the roadways in the immediate vicinity of the project.</p>	<ul style="list-style-type: none"> Development has been anticipated and in the planning process for some time. The City has prepared comprehensive and project-specific documents over the past 15 years that address the traffic potential of this and other large-scale developments within the area. Mitigation measures are provided in Draft SEIS Section 3.3.2.
<p>Lacey Gateway Phase 1 will produce and attract 2,856 trip ends (1,205 inbound and 1,651 outbound) during the evening peak hour.</p>	<ul style="list-style-type: none"> Three types of developer contributions and responsibilities for transportation improvements will be imposed by the City: Developer-funded off-site infrastructure improvements, site access and circulation improvements, and traffic mitigation fees.

Potential Impacts	Mitigation Measures
By 2010, six study intersections will operate at a failing level of service, with or without traffic from the Lacey Gateway Town Center project.	<ul style="list-style-type: none"> The mitigation strategy for Lacey Gateway Phase 1 is described in Draft SEIS Section 3.3.2.
Several future deficiencies on transportation facilities in the study area have been identified for the 2030 horizon.	<ul style="list-style-type: none"> Future development outside Phase 1 will undergo separate environmental review at the time the development is proposed.
PUBLIC SERVICES: FIRE PROTECTION AND EMERGENCY SERVICES	
The development of commercial, office and residential uses will create increased demand for emergency services.	<ul style="list-style-type: none"> An emergency access and fire suppression plan addressing emergency responses during construction will be developed. Minimum fire flows for commercial and multi-family residential buildings shall meet requirements. The City will apply its development regulations pertaining to emergency and fire response, access, building design, etc. to mitigate potential impacts related to site work and building construction. The environmental review of the build-out scenario will include an evaluation of emergency services. An emergency response plan will be prepared that details how emergency services will be planned and coordinated for community events, celebrations, grand openings or similar events. Medical equipment such as defibrillators will be strategically located within Phase 1. Personnel medically trained to respond to basic life support calls will be provided on site.
PUBLIC SERVICES: POLICE PROTECTION	
Development will increase the demand for police services.	<ul style="list-style-type: none"> Building design, landscape and open space plans will incorporate Crime Prevention through Environmental Design strategies. A security plan will be developed prior to implementation of Phase 1 that will provide for a private security company to patrol, monitor and provide basic assistance, automated security cameras throughout the center and parking areas, and a security office strategically located for patrons to access.
The volume of traffic is likely to impact response times into the Gateway area if a substation is not located in the development.	<ul style="list-style-type: none"> A police substation will be centrally located in Phase 1 with a "storefront" presence. The environmental review of the build-out scenario will include an evaluation of police services.
PUBLIC SERVICES: SCHOOLS	
Impacts on North Thurston Public Schools will depend on the ages of the new population and the available capacity of Olympic View Elementary, Chinook Middle School and River Ridge High School.	<ul style="list-style-type: none"> The applicant shall complete a voluntary mitigation agreement with the North Thurston Public Schools for residential portions of the project. The Comprehensive Plan amendment and environmental review of the build-out scenario will include a public schools system analysis to determine the level of impact the potential additional residential units will have on the facilities of North Thurston Public Schools.

Potential Impacts	Mitigation Measures
<p>Significant Unavoidable Adverse Impacts: No significant unavoidable adverse impacts to the transportation, fire protection, emergency services, police protection or schools are expected to result from the Lacey Gateway project.</p>	
<p>UTILITIES: WATER SYSTEM</p>	
<p>The proposed project will have a substantial demand for potable water.</p>	<ul style="list-style-type: none"> • 1,000,000 square feet of retail/commercial/ office buildings and 500 residential units may be constructed with Phase 1 provided that reclaimed water (purple pipe) is used for landscape irrigation and internal flushing within commercial buildings. • The City will apply its development regulations pertaining to water system improvements to mitigate potential impacts associated with water line construction and extension of water services. • Build-out of the Lacey Gateway Development shall use reclaimed water throughout the development for landscape irrigation and for toilet flushing in commercial buildings. • The proponent shall provide water demand analysis indicating the water demand of the proposed development, capacity of the public water system and applicable system improvements to mitigate any identified impacts.
<p>UTILITIES: SEWER</p>	
<p>The proposed project will increase demand for sewer services to serve the Lacey Gateway.</p>	<ul style="list-style-type: none"> • A regional sewer lift station and associated gravity line and force main line will be on line prior to the occupancy of the first building constructed within Phase 1. • The City will apply its adopted development regulations pertaining to sewer system improvements to mitigate potential impacts associated with sanitary sewer line construction and extension of sanitary sewer services.
<p>UTILITIES: ELECTRICITY AND NATURAL GAS</p>	
<p>There will be an increased demand for natural gas to serve the increased density and intensity of development proposed.</p>	<ul style="list-style-type: none"> • The proponent will coordinate with Puget Sound Energy to assure adequate natural gas and electrical facilities are in place and available. • An additional Hawks Prairie feeder circuit from the east of the site shall be installed prior to the end of Phase 1. • Pleasant Glade circuit shall be extended from the west of the site along Britton Parkway NE prior to the end of Phase 1. • If a project requires new facilities in advance of PSE's plans to construct them, the proponent must provide financial support or construct the facilities to assure they are completed in time to support the development. • A new electrical substation shall be energized and feeder circuits installed to serve future phases.
<p>Significant Unavoidable Adverse Impacts: There are no unavoidable significant adverse impacts to Utilities anticipated to occur as a result of the proposed project.</p>	
<p>NOISE</p>	

Potential Impacts	Mitigation Measures
Noise impacts will result from traffic and short-term construction activity.	<ul style="list-style-type: none"> • Construction of the mixed-use residential properties shall incorporate acoustics, including double pane windows, insulation and architectural strategies to reduce street noise for residents. • A noise reduction program will be developed to reduce the impact to occupied residential units within the development as construction occurs.
Noise from the increased population and vehicles on site will be the primary cause of increased noise levels in the long term.	<ul style="list-style-type: none"> • Organization of land uses, with residential properties located a distance from I-5, will reduce the impact of traffic noise on residential properties. An additional noise study will be required if sensitive receivers are located within 200 feet of I-5. • A noise study shall be required for each parking garage proposed on site and appropriate mitigation will be required. • The City will apply its adopted development regulations pertaining to noise and disturbance issues to mitigate impacts associated with the development of Phase 1 and build-out.
<p>Significant Unavoidable Adverse Impacts: Unavoidable impacts will result from traffic noise, however, with mitigation measures these impacts can be reduced to reasonable sound levels. Much of the future traffic noise will be due to general growth of the area, and not due solely to Lacey Gateway Town Center.</p>	

1.8 Cumulative Effects

1.8.1 Cumulative Effects Analysis for Lacey Gateway Town Center

The cumulative effects analysis considers significant probable environmental impacts from the proposed project beyond project-specific impacts, predicting what may occur in the immediate project area and surrounding community. The envisioned development of the Hawks Prairie Business District, including the Lacey Gateway Planned Action site, has been planned for and evaluated in numerous studies and environmental documents, beginning with the Northeast Area Planning Element in 1992. Because the City of Lacey has planned for growth under the requirements of the Growth Management Act and has included the Hawks Prairie Area in population projections, it is not expected that Lacey Gateway Town Center will require future actions that have not been addressed in previous planning documents.

As noted above, the City undertook environmental review and prepared the Environmental Impact Statement for the City of Lacey and Lacey Urban Growth Area Comprehensive Plan in 1994. The EIS addressed the probable significant environmental impacts that would result from the City’s planned growth, including the City’s UGA.

It is envisioned that the Lacey Gateway Town Center Phase 1 will be developed over an approximate 10-year period. Timing of future phases beyond Phase 1 is unknown. Because of this long timeframe, the changes in baseline conditions that will occur, and more specific definition at a later time of development phases that will occur beyond Phase 1, the City of Lacey will require supplemental environmental review at the time of development applications for future phases. Furthermore, if development of future phases is proposed prior to development of Phase 1, Phase 1 would be used as a pipeline project in determining the cumulative impacts of the entire Gateway Town Center project.

2. THE LACEY PLANNING AREA

2.1 Planning Area Description

2.1.1 Location

The Lacey Gateway Town Center project is comprised of 250 acres of land located in the northeast area of the City. The project site is located north of Interstate 5, generally bounded on the west by Carpenter Road NE and on the east by Marvin Road NE, and lies directly south of Britton Parkway NE. The Lacey Gateway Planned Action site is 120 acres in size and is located to the north of Interstate 5, south of Britton Parkway, and east of Gateway Boulevard and the recently opened Cabela's store.

2.1.2 History

The Hawks Prairie Planning area (HPPA), as described below, was not within the city limits when the City of Lacey incorporated in 1967. The addition of HPPA into Lacey's corporate limits occurred gradually over approximately eight years beginning in the mid-1980s. The first annexation north of Interstate 5, which included what is now the proposed site for the Lacey Gateway Town Center Project took place in 1985. In 1989, an additional 463 acres were annexed into the City which included large land holdings owned by Evelyn Betti and Lemay Enterprises. The Meridian Campus Master Planned Community, encompassing 1312 acres, was annexed in 1992. In 1995 the Hawks Prairie Master Planned Community was annexed as well. The annexations of both the Meridian Campus and Hawks Prairie Master Planned communities would pave the way for the rapid growth in population that occurred north of the interstate in the early 2000s.

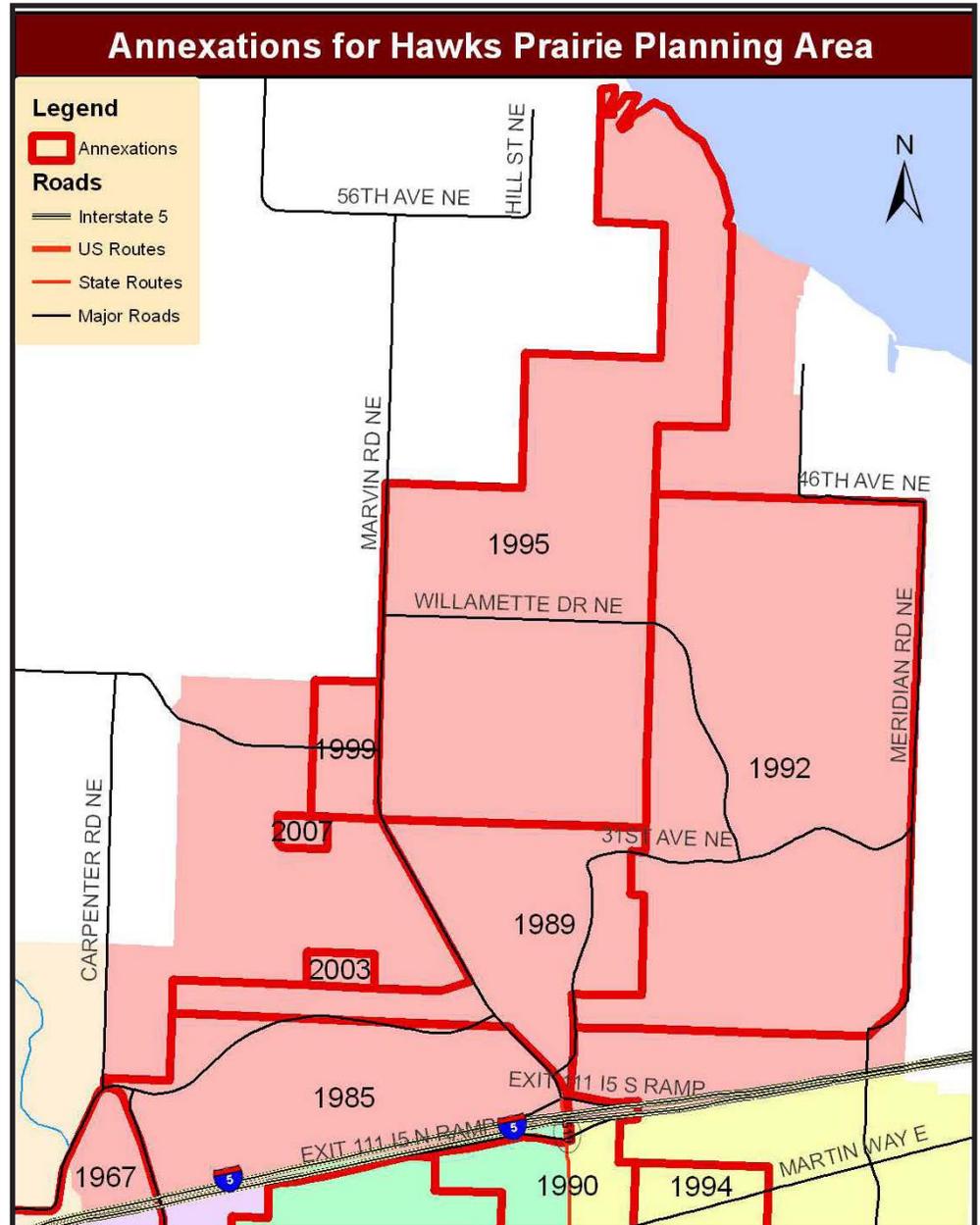


Figure 2.1 - Hawks Prairie Planning Area annexations

2.2 Existing Conditions

2.2.1 Land Use

The entirety of the Lacey Gateway Planned Action site is located in the Hawks Prairie Business District (HPBD). The HPBD is comprised of two sub-zones: Hawks Prairie Business District – Commercial (HPBD-C) and Hawks Prairie Business District – Business/Commercial (HPBD-BC). HPBD-C allows for retail and entertainment uses as well as a limited number of personal services. HPBD-BC allows all of the uses in HPBD-C but also permits more intense office uses as well as some light manufacturing – uses that typically generate more employment than retail uses. This subzone also permits residential development at a density of 20 units per acre provided the units are located in mixed-use buildings along with retail and/or commercial uses.

The projectsite for the proposed “Lacey Gateway Town Center” is currently undeveloped, with the exception of a Cabela’s store developed on a 28 acre parcel in November of 2007. Gateway Boulevard and a roundabout at its intersection with Britton Parkway were built concomitantly with the construction of the Cabela’s store.

2.2.2 Planning Area Description

Hawks Prairie Planning Area

The Lacey Gateway Town Center and Planned Action site are located in the Hawks Prairie Planning area, one of eight designated planning areas located within Lacey and its growth area. The Hawks Prairie Planning Area comprises the northernmost portion of the Lacey growth area. It is located north of Interstate 5, bounded on the east by Meridian Road and on the west by Marvin and Carpenter Roads.

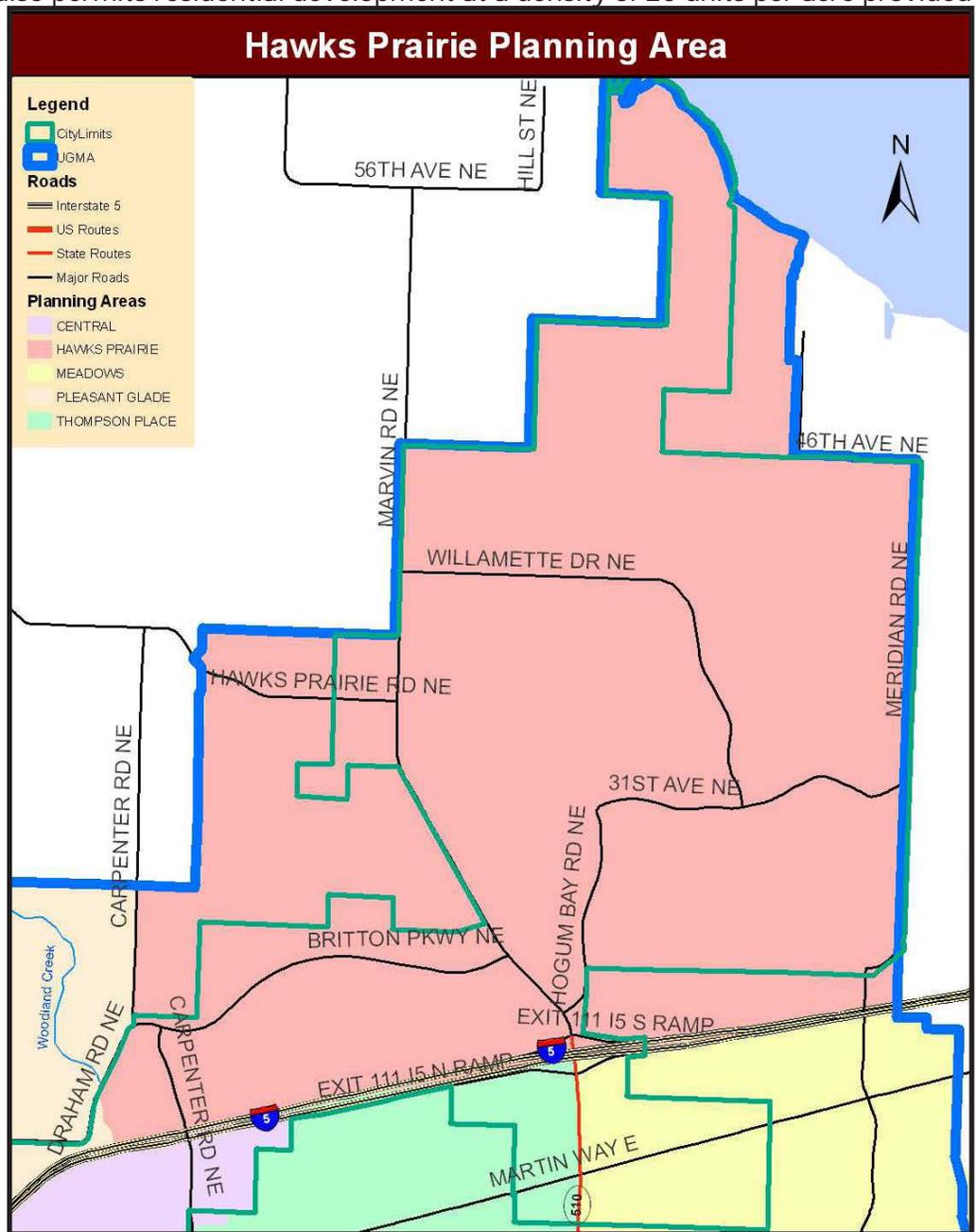


Figure 2.2 - Hawks Prairie Planning Area

The Comprehensive Plan identifies the Hawks Prairie Planning Area as one of the City’s most opportune areas for new development due to the availability of vacant land and prime location adjacent to the Interstate 5 corridor. The Comprehensive

Plan identifies the vision established in the City’s Northeast Area Plan, 1992 as the guiding force for the area. The goals and policies adopted in the Northeast Area Plan were adopted by reference in the Comprehensive Plan.

2.2.3 Housing

Existing housing stock within the City consists of a variety of housing types including single family, multi-family, townhouses, condominiums, and manufactured homes. In 2007, it was estimated that there were approximately 15,910 housing units within the City and an additional 12,890 housing units within the growth area. Single family residential development represents 63 percent of the total available housing stock within the current city limits, multi-family units comprise 32 percent and manufactured homes 5 percent of the total.

The Hawks Prairie Planning Area (HPPA) is comprised of all four of the City’s designated residential zoning districts. A general calculation using acreage of both developed and vacant parcels shows that the Low Density 0-4 district allows for a potential of 7,648 units over 1,912 acres. The Low Density 3-6 district covers 244 acres in HPPA and would allow between 732 and 1,464 units. With a density allowance ranging between 6 – 12 units per acre, the Moderate Density District would allow between 1,422 and 2,844 units over 237 acres of land. The 241 acres of land designated as High Density Residential in HPPA would allow for a range of between 1,446 and 4,820 units. To date, residential projects have generally developed at the lower end of the City’s density allowances.

Table 2- 1 – Potential Range of Units in Hawks Prairie Planning Area

Zoning District	Total Acreage in		Minimum #of Units	Maximum #of Units
	HPPA			
Low Density 0-4	1,912		0	7,648
Low Density 3-6	244		732	1,464
Moderate Density 6-12	237		1,422	2,844
High Density 6-20	241		1,446	4,820
Total	2,634		3,600	16,766

The residential land zoning designations used in the Northeast Area Planning Element differ from the current residential zoning districts used by the City of Lacey. The Northeast Area Plan designated approximately 158 acres of High Density Residential land allowing up to 20 units per acre, 127 acres of Medium Density Residential land allowing up to 12 units per acre, and 9 acres of Moderate Density Residential land allowing up to 8 units per acre. The maximum gross number of dwelling units allowed by Northeast Area Planning Element would be 4,756.

The Hawks Prairie Business District totals approximately 450 acres. 122 acres are restricted to commercial development only. The remaining 327 acres allow for residential development at a density of 20 units/acre. However, provisions of the HPBD-BC zoning ordinance provide that only 10% of a parcel may be used to calculate the number of units permitted on a parcel. Based on these requirements a maximum of 654 units would be allowed within the HPBD.

The 2004 Update to Lacey’s Comprehensive Land Use Plan projected that by the year 2025 there would be 4,290 single family and 1,050 multi-family residential units within the HPPA. Based on subdivisions and binding site plans approved since adoption of the 2003 Comprehensive Plan Update there are 4,988 residential units committed in the HPPA – 3,822 single family units, 1,046 multi-family units, and 120 units of manufactured housing. This number includes both built and unbuilt lots. (See Appendix A for detailed account of planned residential projects and unit counts.) Of the incorporated land within the HPPA only three residentially zoned parcels, a total of 42.68 acres, remain for which applications for development have not been made.

As of this writing there are a limited number of land parcels left in Lacey’s city limits suitable for long

Residential Development: Hawks Prairie Planning Area

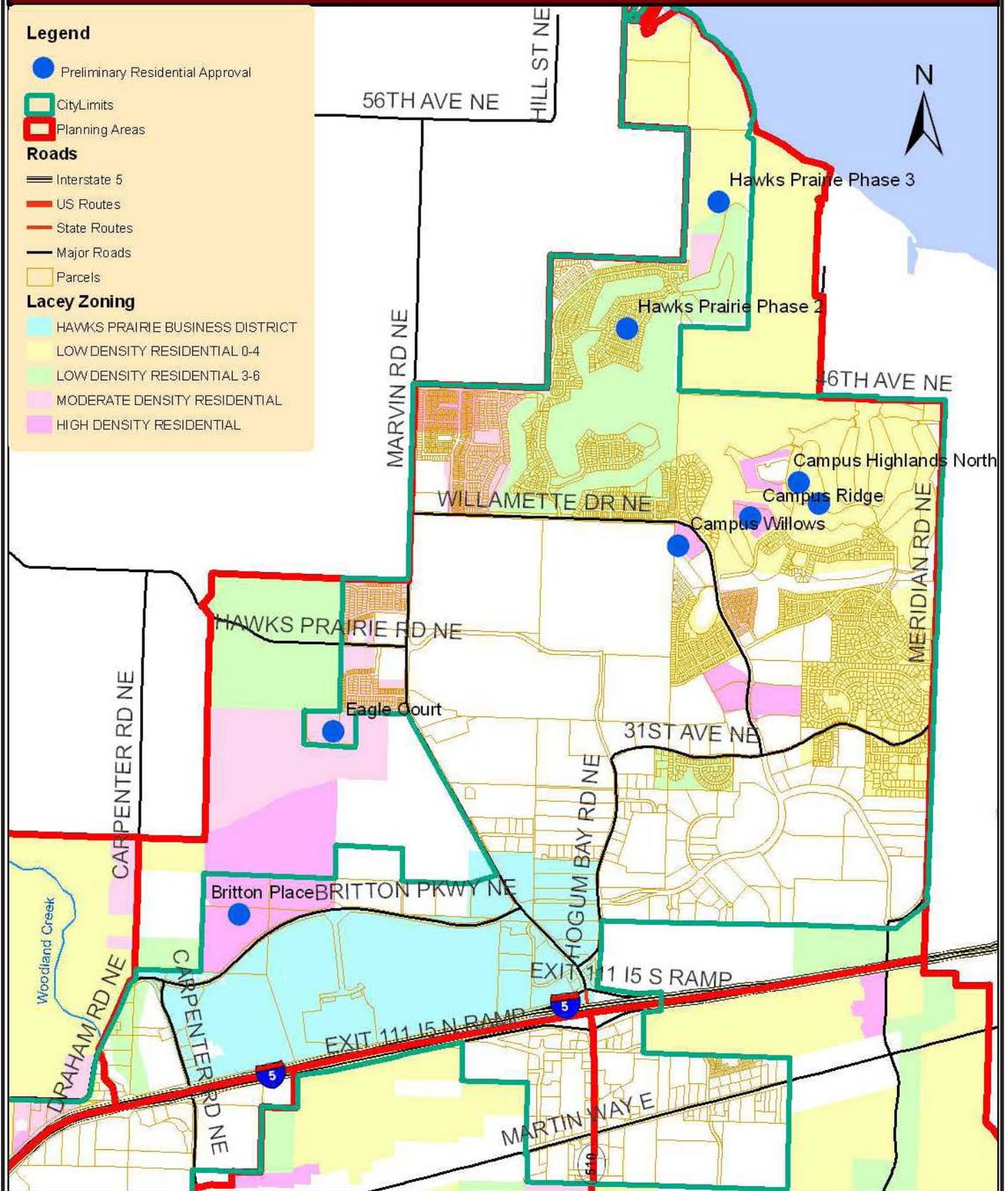


Figure 2.3 - Hawks Prairie Planning Area residential development

plat residential subdivision. Meeting the City's future demand for residential growth will require increasing densities and integrating residential units with retail and commercial projects.

Currently there is no residential development located on the Lacey Gateway Town Center site. The Lacey Gateway Project will incorporate both higher densities and mixed-use buildings. At full build-out, it is proposed that the site will house up to 2,500 residential units, however, the Planned Action for Phase One will contain only the 500 units permitted under the current Comprehensive Plan and Zoning Ordinance.

2.2.4 Capital Facilities

The Lacey City Council adopted its most recent Capital Facilities Plan (CFP) in 2007. The policy of the Lacey City Council is to provide essential public services and enhancements in a manner that is cost effective and based on documented need. With the growth that has occurred in the Hawks Prairie Planning Area, and specifically, the growth that is anticipated in the Lacey Gateway Town Center proposal, new capital facility projects supporting the planning area were included in 2007-2026 CFP.

Components of the Capital Facilities Element

General Government:

Police service to the Lacey Gateway Town Center project will be provided by the Lacey Police Department. Lacey Fire District 3 will provide fire protection as well as rescue response and emergency medical services. The Lacey library is part of the Timberland Library network.

Public schools within Lacey and its growth area are run by North Thurston Public Schools (NTPS). Twelve elementary schools, three middle schools, three comprehensive high schools, and one smaller vocational high school are located within the district. NTPS will continue to serve the area contained in the Lacey Gateway Town Center. At this time the schools serving the Lacey Gateway Town Center are Pleasant Glade Elementary, Chinook Middle School, and North Thurston High School.

The City's 2007-2026 CFP identifies the purchase of 10 acres to preserve for civic uses. Potential civic uses include a future library, city hall annex, performing arts center, and an area for use as a farmers'/public market. The CFP recognizes a civic presence as an important component in the success of Lacey Gateway Town Center. The inclusion of civic uses into a strong commercial center will help establish the project as a collaborative effort between both the public and private sectors and will strengthen Gateway as a viable community center.

Parks

In 2004 the Lacey City Council adopted the *City of Lacey Comprehensive Plan for Outdoor Recreation (ORP)*. This plan is the primary framework for providing high quality parks and leisure services to the citizens of Lacey and the surrounding growth area. The plan strives to ensure that adequate park facilities and resources will be available in the future as Lacey's population base and land area grows.

The Outdoor Recreation Plan divides the City and its UGA into ten "park planning sectors." The Lacey Gateway Town Center project is located in park planning sector "X" – an area identical in its boundaries to the HPPA. This sector is identified in the ORP as being under-served by Community Parks – larger parks that offer a broad range of facilities and readily accessible to residential areas. At this time, the City has no public parks planned in the Gateway project site.

Sewer

The City of Lacey owns, operates, and maintains a wastewater (sewer) system with a service area of approximately 33 square miles. The city's existing service area includes most of area in the incorporated limits. The treatment and disposal of wastewater is provided by the Lacey-Olympia-Tumwater-Thurston County Wastewater Treatment Facility (LOTT). Lacey is responsible for maintaining the local system,

which serves individual customers using gravity mains or pressurized Septic Tank Effluent Pumping (STEP) systems.

Wastewater generated in the Lacey sewer system is transported to the Martin Way Satellite Treatment Facility on Martin Way and to the LOTT plant for treatment.

There are three lift stations planned for the HPPA as identified in both the 2005 Wastewater Comprehensive Plan and the 2007-2026 CFP. However, only lift stations A and D will serve the Lacey Gateway area. Lift station A, a regional lift station, will be located north of Britton Parkway, east of Carpenter Road, and will be necessary to serve Phase 1 development of Lacey Gateway. This lift station is currently in the design phase with construction anticipated for 2009/2010.

Stormwater

Over the last several years an expanding population and increased land development have increased stormwater runoff problems. These runoff problems take the form of both water quantity and quality issues. Existing storm and surface water systems cannot handle the increasing quantity of water nor the decreasing quality of the runoff. Recent or emerging federal and state regulations are requiring cities and counties to develop and implement stormwater management programs to mitigate existing water quality impacts and to lessen impacts from future development.

In order to manage stormwater associated with existing, older development within Lacey, the City has constructed both regional stormwater facilities and has also done extensive wetland enhancement to improve historic drainage ways and to provide appropriate treatment of stormwater generated by preceding development. Current and future properties are required to manage stormwater impacts through the use of stormwater management systems located on the development site that provide treatment, detention or infiltration meeting state and local standards.

The Lacey Gateway Town Center project site is currently undeveloped and contains no impervious surface. A stormwater management system serving Cabela's and its associated roadways was installed at the time the store was constructed. As build-out of Lacey Gateway Town Center continues, the existing stormwater system at Cabela's will be incorporated into the regional system for the entire project area.

Water

At present, Lacey relies almost exclusively on groundwater to serve the water needs of its residents. Currently there are 19 active production water wells serving the residents of Lacey. Since publication of the 2002 Comprehensive Water Plan, the City has acquired additional annual water rights and is now authorized 8,637.8 acre-feet. With additional water rights purchases from the City of Olympia, the City has been able to meet the demands for water within the city limits.

Since Lacey's system is relatively new and the need for major repairs is relatively low, Lacey's primary challenge is to meet growth-related source, storage, and transmission demands as they occur.

The 2007-2026 CFP identifies five water projects in the Hawks Prairie Planning Area – four of which will help to serve the Gateway project area. The construction of the Hawks Prairie water treatment facility is completed, as well as the construction of an additional well integrated into the same facility. An additional well and pump are planned in Hawks Prairie in order to help meet the increased system demand from the Gateway project and other development in the area. An additional 3,800 feet of 16-inch water main was installed along Hogum Bay Road north of 31st Avenue in order to improve peak hour pressure in the area.

Reclaimed Water

As Lacey continues to grow, the demand for potable water also increases. Each additional equivalent

residential unit added to the water system requires water for domestic and irrigation use. Lacey relies exclusively on potable water for irrigation. As part of its strategy to decrease the City's potable water usage, Lacey is working on the development of a reclaimed water utility. This water will provide an additional option for non-potable water uses.

Historically, the City of Lacey's wastewater system transmits all sewage and effluent to the LOTT Alliance (LOTT) wastewater plant in downtown Olympia. Recently, LOTT has developed a regional reclaimed water plan as part of their overall 20-year Wastewater Resource management Plan.

LOTT has plans to build as many as four reclaimed water treatment plants. The initial plant was constructed in downtown Olympia. A second treatment plant was constructed in Lacey on Martin Way. Additionally, in 2004 LOTT constructed the Hawks Prairie reclaimed water treatment facility with two membrane treatment units and five wetland infiltration ponds. Three miles of "purple pipe" transports the reclaimed water from the Martin Way plant to the wetland ponds located on Hogum Bay Road NE.

Currently, between 800,000 and 1,000,000 gallons of Class A reclaimed water is generated per day – 280,000 gallons is allocated to the City of Olympia, 250,000 is required for the Hogum Bay ponds, and the remainder of the reclaimed water is available for use by the City of Lacey. At full design, the Martin Way facility and the Hogum Bay ponds will be able to produce up to 5 million gallons of reclaimed water a day. The current capacity to produce reclaimed water is 3 million gallons a day; however, this amount has not yet been realized.

The Reclaimed Water chapter of the 2007-2026 CFP specifically identifies the Gateway project as an immediate beneficiary of reclaimed water infrastructure to be extended from the Willamette Drive roundabout as well as the construction of reclaimed water storage facilities in the vicinity of Britton Parkway.

2.2.5 The Utilities Element

The Utilities Element of the Comprehensive Plan addresses utilities supplied by the private sector, including electrical, telecommunications, and natural gas. Utilities provided by the City are included in the Capital Facilities Element of the plan as discussed above. The major utility providers in Lacey and its growth area are Puget Sound Energy, Qwest, and Comcast.

Puget Sound Energy builds, operates, and maintains natural gas facilities serving the City of Lacey. With the construction of the Cabela's store a gas main was installed in Britton Parkway and Gateway Boulevard.

Puget Sound Energy is the only provider of electricity in Lacey and its growth area. As such, PSE will provide electrical service to the entirety of the Gateway project area. Meeting this demand will require installation of additional feeder circuits and a new substation. PSE representatives are beginning to work with the City to update the utility element to identify facility needs to serve growth in the northeast area.

The telecommunications industry has grown significantly in the last decade; as such there are now a number of companies providing these services in Lacey. However, Qwest and Comcast continue to be the predominant providers of standard telephone and cable television service, respectively, in the City of Lacey. Additionally, there are a number of Federal Communications Commission (FCC) licensed cellular and wireless phone providers serving the area.

2.2.6 Transportation

The Lacey Transportation Plan is an element of the City's Comprehensive Plan with the goal to provide for a transportation system that will meet the needs of anticipated growth within the City and its growth area. In order to keep Lacey an attractive place in which to live and work, the Transportation Plan includes measures such as travel demand management strategies, efficient public transportation, more roadway connections,

access control, bicycle and pedestrian facilities, higher land use densities and additional mixed-uses in urban areas.

The City began planning for significant growth in the Hawks Prairie area in the early 1980s. The Northeast Area Plan, in 1992, established a "Hawks Prairie District" to provide a dense mixed-use node. At that time, projects for the Northeast Area predicted that the transportation facilities in place would not be able to adequately serve the new growth.

In the early 2000s, the City completed several improvements to help accommodate the anticipated growth, including:

- Widening Marvin Road to a four-lane boulevard between I-5 and Willamette Drive, including installation of two multi-lane roundabout intersections
- Constructing Britton Parkway, a new east-west arterial between Marvin Road and Carpenter Road
- Rebuilding and widening the Marvin Road/I-5 diamond interchange.

The City of Lacey is currently conducting an analysis of the long range needs for the Lacey transportation network. The Lacey Transportation Systems Analysis and Alternatives Evaluation (LTSAAE) study is evaluating the future traffic demand in Lacey near I-5 between the Nisqually interchange and the Sleater-Kinney interchange. The Lacey Gateway Town Center is within the LTSAAE and the recommendations of the study will accommodate the projected population and employment projected for full build-out of the Lacey Gateway Town Center.

2.2.7 Economic Development

Economic development in Lacey has been addressed in the past though the 1977 Lacey Development Plan and the 1992 Lacey Comprehensive Plan, Northeast Area Planning Element. Both plans stress the importance of diversifying Lacey's economic base in order to strengthen the City's tax base as well as employment opportunities for its citizens. It has been consistently recognized that a vibrant and competitive economy is critical to enhancing Lacey's image as a good place to live, work and play.

3. IMPACT ANALYSIS

3.1 State Environmental Policy Act (SEPA)

This Supplemental Environmental Impact Statement (SEIS) examines the potential environmental impacts of the proposed Lacey Gateway project. This SEIS examines the differences between the impacts of the project described in the Master Plan and the impacts anticipated and evaluated in the City of Lacey Comprehensive Plan Environmental Impact Statement, May 1994. The SEIS describes changes to the type or degree of impact and mitigation measures that can be implemented to offset those impacts. The intent of the Master Plan is to establish a vision for development of the area as a mixed-use center, consistent with the City of Lacey Comprehensive Plan.

The Lacey Gateway project consists of approximately 250 acres of land in the northeast area of the City. The project site is within the Hawks Prairie Planning Area located north of I-5, west of Marvin Road, and south of Britton Parkway. The site is partially cleared and a Cabela's retail store is located on approximately 28 acres in the southwesterly portion of the property. Gateway Boulevard and portions of Main Street in the vicinity



Figure 3.1 - Lacey Gateway Town Center conceptual site plan

of Cabela's have been constructed, providing access to Cabela's from Britton Parkway.

Phase 1 of the project consists of approximately 120 acres of land in the eastern portion of the site. Phase 1 will provide the core of the mixed-use town center envisioned by the City. This phase, as proposed, will consist of:

- 939,000 square feet of retail space
- 100,000 square feet of office space
- 500 housing units
- 270 hotel rooms (87,000 square feet)
- 44,000 square feet of cinema area
- 30,000 square feet civic use (ex. library space)
- 5,843 surface parking spaces, 412 structured parking stalls and 175 on street parking spaces for a combined total of 6,430.
- approximately 13.5 acres open space/greenbelt

* Source: Hatton Godat Pantier Conceptual Land-Use Plan dated January, 2009

The primary focus of Phase 1 development will be the central retail blocks, with offices and/or housing located on upper floors. The majority of housing proposed in Phase 1 will be located in multi story, mixed-use structures with ground floor parking, commercial/retail, etc. Townhomes bordering the open space corridor are possible however they are not shown on the current Phase I conceptual layout.

As the Lacey Gateway project evolves, it is anticipated that surface parking lots will be converted to additional building space or parking structures. Ultimately the project will contain over 18,000 parking spaces comprised of a combination of surface parking, on street parking and above grade parking.

Future phases of Lacey Gateway could add 2,000 housing units, additional retail to total 930,000 square feet, additional office to total 900,000 square feet, and 375 additional hotel rooms, for a total 645 rooms. The completed project will include approximately 55 acres of roads, approximately 6.5 acres of central greenway, 3.3 acres of open space associated with Gateway Boulevard and Cabela's and 18.8 acres of greenbelt adjacent to I-5 and Britton Parkway including the constructed wetlands.

3.1.1 Planned Action

The proposed Lacey Gateway project site is an ideal candidate for a Planned Action EIS because of the discrete geographic boundaries and homogenous characteristics of the site. Due to the phased development proposal and the more detailed information available regarding Phase 1, this EIS evaluates the specific project level impacts of Phase 1 of the Lacey Gateway and provides a more programmatic review of future phases.

Because this EIS provides only a programmatic evaluation of potential impacts for development outside Phase 1, future projects in future phases through build-out will require additional environmental review under SEPA. Projects within Phase 1 will not be subject to further environmental review if they are consistent with Phase 1 as analyzed in this SEIS.

All information included within this SEIS is based on plans, reports and special studies prepared for the project and provided to the City by the applicant.

3.1.2. Mitigation Strategy

Many impacts of the proposed Lacey Gateway project are mitigated by existing City of Lacey code provisions. To the extent possible where existing codes provide mitigation, those codes have been identified in this document. Where code provisions are particularly relevant to mitigating this project's impacts, they are cited in the relevant mitigation section of this document.

Because this environmental evaluation is programmatic in nature, mitigation measures have been identified for Phase 1 only. Specific information regarding the size and location of development within Lacey Gateway has been provided in sufficient detail to evaluate the environmental impacts of the first phase of the project.

The City of Lacey has committed to the availability of water and sewer services for Phase 1 only - approximately 1,000,000 square feet, 500 units, but not to exceed 227,300 gallons per day. The uncertainty of the timing and nature of future phases require that further analysis of their impacts occur at a future time when specific development proposals have been refined and are ready to go through the permit process.

Future phases beyond Phase 1 will require additional environmental analysis regarding the specific elements of the proposal at the time of application for development permits. Mitigation measures for future phases have been identified and listed where possible, but these measures are not comprehensive and will be revisited when more detail concerning future phases is available.

3.2 Natural Environment

This section evaluates the potential impacts of the Lacey Gateway Master Plan on the natural environment in the Northeast Area of Lacey. It includes impacts on geology and soils, air quality, water, and plants and animals.

3.2.1. Geology and Soils

This section is based on information contained in technical reports submitted to the City of Lacey by Shannon & Wilson, Inc. and Pacific Rim Soil and Water, Inc. The geology and soils present within the project area were evaluated for suitability for road construction, potential impacts associated with geologic hazard areas, and potential for infiltrating stormwater. The technical reports did not evaluate soils for suitability for foundations and footings. Information was obtained from Thurston County Soil Survey maps and site-specific exploration done by Shannon & Wilson, Inc. and Pacific Rim Soil and Water, Inc. All technical background reports are provided in Appendix B of this SEIS.

Existing Conditions

Regional Geology

The topography of Thurston County ranges from coastal lowlands to prairie flatlands to the foothills of the Cascade Mountains. Repeated glacial advance and retreat formed the geology underlying most of the region. The area's prairies, rolling terrain and lakes reflect the advance and retreat of the Vashon Glaciation, the most recent of several glaciers that extended into the area. Beginning with a cooling period about 15,000 years ago, a continental ice mass extended from British Columbia to its terminus in south Thurston County. The depth of glacial sediment in Thurston County increases dramatically from south to north. The Vashon Drift deposited during the most recent glaciation is composed of large quantities of stratified sand and gravel. The upper formation is the Vashon recessional outwash (Qvr) which creates the hummocky terrain and the numerous lakes of the region. Below the Qvr is a generally confining layer called the Vashon glacial till (Qvt). This "hardpan" is composed of sand and gravel encased in a matrix of silt and clay. At the bottom of the Vashon Drift are materials laid down during the Vashon glacial advance (Qva), which serves as a significant potable aquifer for the region.

Soils in the northeast area of Lacey are generally classified by the Soil Survey of Thurston County as Soils on Glacial Uplands, which formed in glacial outwash (Qvr) and till (Qvt). These soils are highly variable, ranging from nearly level to steep, moderately deep to very deep, and moderately well-drained to somewhat excessively drained.

Topography of the Lacey Gateway Project Area

The Lacey Gateway site generally slopes gently downward from the north to the south. A ridge line oriented generally northwest to southeast runs through the central portion of the site. According to information obtained from Thurston County GeoData, overall site relief is approximately 84 feet. Elevation across the site ranges from a high of 252 feet along the mid-site ridge to a low of 168 feet in the base of an old gravel pit located in the southwestern corner of the site.

Geology and Soils in Lacey Gateway Project Area

The Thurston County Soil Survey mapping of the geology in the area shows soils of Alderwood gravelly sandy loam with 3-15% slopes across much of the northern and northeast portions of the site. Based on field observations by Pacific Rim Soil and Water (September, 2006), this soil extends further to the south than indicated in the soil survey maps. Everett very gravelly sandy loam, 3-15% slopes, is mapped in the central portion of the site by the Natural Resources Conservation Service (NCRS). Field investigation found these soils further to the south along the side slopes of the midsite ridge. Indianola loamy sand, 0-3% slopes is mapped as two linear units in the central portion of the project site, however, was not observed during the field soils investigation. Spanaway gravelly sandy loam, 0 to 3 percent slopes, is mapped in the southern and western third of the site. While about half of the test pits in the southern third of the site were typical

of the Spanaway series, field investigation found that surface disturbances associated with past logging and gravel mining operations have stripped the thick surface organic horizons typical of the Spanaway series. As a result, the majority of soils in these areas of the site resemble the Everett series. In general, the site is a mixture of shallow till soils throughout the northern and central portions of the site and deep outwash gravels and sands or outwash overlying till throughout the remainder of the site.

Geologic Hazards

The City of Lacey defines geologically sensitive areas in the Lacey Municipal Code (LMC 14.37.) No portion of the site has been designated as geologically sensitive by the City.

Grading Proposal

A preliminary grading plan has been developed in support of the Lacey Gateway project. The overall goal of site grading is to create a viable commercial/retail town center. A number of objectives were set in an effort to achieve this goal. The grading plan must meet the City's development code requirement. The site must be graded consistent with the regional stormwater system. The regional constructed wetlands are located along the southern edge of the site and the infiltration galleries are located in the south-east portion of the site where well drained gravels are located. Therefore, the site must be graded such that stormwater will drain to these facilities.

The grading plan must match grades at existing right of ways. There are a number of such locations. There are four locations along Britton Parkway, Gateway Boulevard with the Main Street extensions and the Main Street extension from Marvin Road to the eastern property boundary.

The grades need to achieve a maximum 3% in order to ensure a walkable community. Steeper slopes (up to 5%) are anticipated in some areas adjacent to the greenbelt where grades will transition from vegetative protection areas to final grades.

The grading plan must minimize the amount of material to be exported from the site. To this end, the preliminary site grading plan was developed to generally achieve a cut/fill balance. Export of some top soil due to large quantities may be unavoidable.

Finally, the grading plan should minimize grading within open spaces. The central greenway open space tracts located near the western boundary will need to be graded to meet regional stormwater drainage and other site grading goals.

The intent of the grading plan is to split the site into an eastern and western portion. The proposed grading split occurs at Gateway Boulevard and the Cabela's property. The intent of this split is to balance each side of the site in such a manner that either side could be graded independently of the other and balance. This will limit the need to have large earth-moving equipment crossing Gateway Boulevard or traveling offsite. It should be noted, however, that the grading phases do not necessarily correspond to exact build-out phases. This difference is due to the logistics of mass grading a site of this magnitude. Consideration was also given to street layouts in order to minimize heavy grading machinery crossing and damaging finished streets. The large amounts of cut/fill require that the project be graded in more of a "regional" fashion. As either phase is graded, the boundaries will be cut or filled with maximum 2:1 slopes to match adjacent grades. Where such slopes will remain for extended periods, they will be stabilized in accordance with the City's requirements.

The preliminary grading plan for Lacey Gateway is provided in Appendix C of this SEIS. Overall grading quantities for Lacey Gateway are as follows:

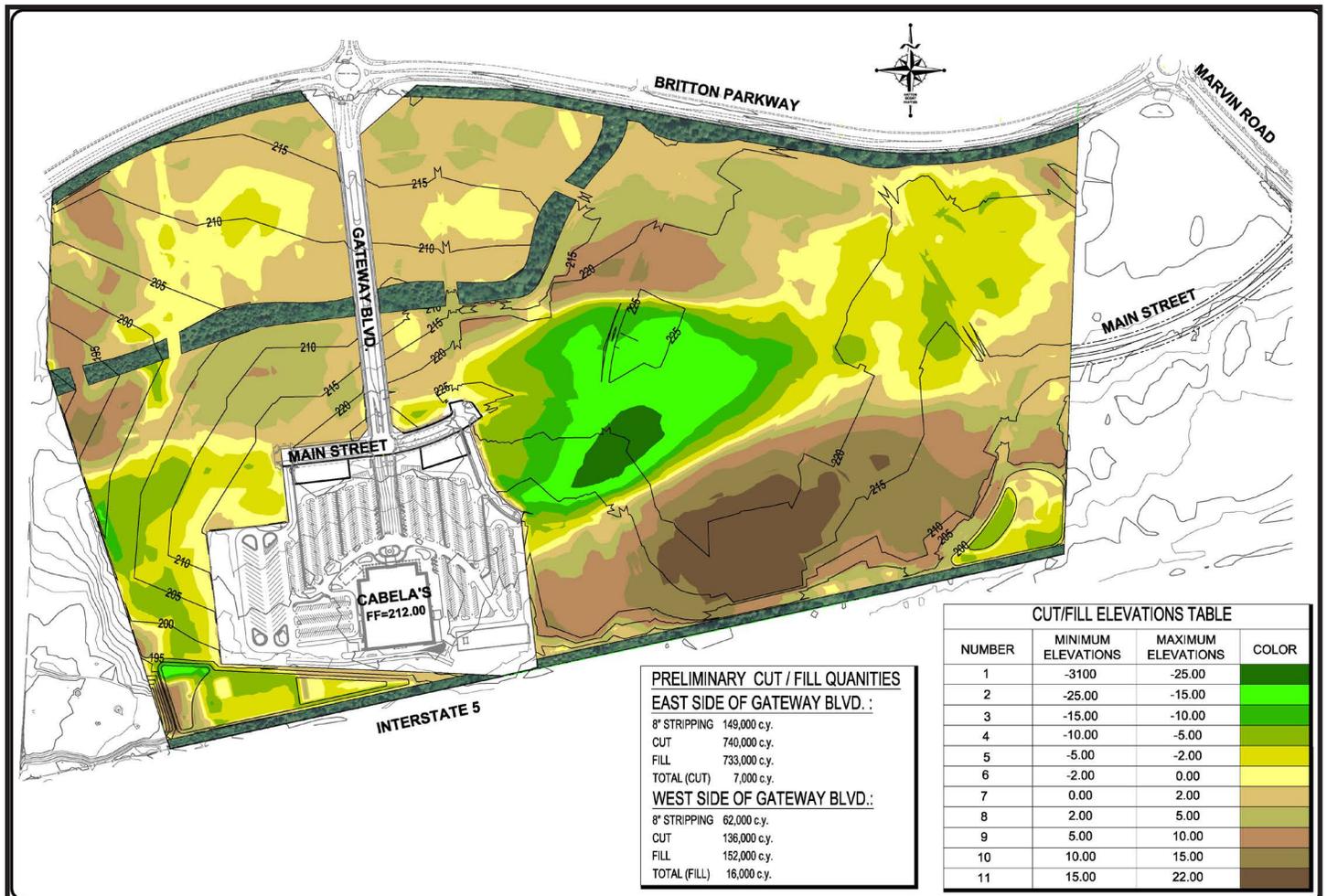


Figure 3.2 - Lacey Gateway Town Center conceptual grading plan

Table 3-1 Grading Quantities

Phase	Cubic Yards of Cut	Cubic Yards of Fill	Total (Cubic Yards)
East Side Grading (Phase 1)	740,000	733,000	CUT 7,000
West Side (Future)	136,000	152,000	FILL 16,000
	876,000	885,000	FILL 9,000

Impacts Phase 1

All new development projects have impacts on the earth resulting from covering natural areas with impervious surfaces and exposure of soils to erosion through disturbance of slopes, removal of existing vegetation, and filling or grading. The Lacey Comprehensive Plan EIS states that Lacey's relatively flat topography will minimize the need for excavation and fill; however, because of the ridge line through the site and the proposal to create a site with slopes generally not exceeding 3%, significant grading will be required to balance the site. The specific nature of the proposed development site is rolling as opposed to the generally flat topography described in the Comprehensive Plan EIS. A large volume of soil will be moved to create a generally level development site. Fill material will be composed of soils moved from high points on the site and is not expected to include import of material from off-site sources. Pre-excavation soil density and hydraulic properties may be affected by the proposed grading plan.

The construction activity associated with development of Lacey Gateway will create the potential for erosion to occur, even when required erosion control measures are in place. In the short term, runoff and erosion caused by construction will likely increase.

Build-out

A change in natural infiltration will possibly occur due to disturbances to the native soils through grading and compaction. Existing trees and vegetation will be removed due to the extensive grading required for the project. As trees are lost, the amount of water that infiltrates into the ground and local aquifers may increase due to loss of evapotranspiration, and the natural dispersed nature of infiltration on a native site versus a developed site.

The site will be graded such that the site generally balances cuts and fills. Therefore it is not likely that soils other than unused topsoil will need to be removed from the site. The project proponent has not identified a receiving location for the excess material, nor the timing of the removal. Prior to the removal of any soil from the site, the receiving location must be provided to the City, as well as a plan identifying the route trucks will use and anticipated daily number of truckloads to be leaving the site.

Mitigation Measures

Phase 1

The following mitigation measures all apply to Phase 1 of Lacey Gateway:

1. A comprehensive grading plan will be prepared that documents the soil types on site, finalizes the amount of soil movement, provides cross sections showing existing and final elevations as required by the City; locations of stock piles for top soil, fill material and spoil, and a comprehensive erosion control plan to prevent wind and water erosion of disturbed soils and stock piles. The comprehensive grading plan will also include a geotechnical report addressing soil suitability and recommending actions necessary for future footings, foundation and roadways. In addition, the comprehensive grading plan will recognize the measures identified below.
2. All cut and fill on site will be balanced to the maximum extent possible. If any material is exported from the site, a material export plan will be developed that indicates the receiving locations are appropriately permitted locations for the jurisdiction/receiving the material, a haul route plan, a commitment to restore all damage to the public roadway caused by haul trucks during soil transport.
3. Grading of the site will be limited to the area of Phase 1 of the Lacey Gateway Master Plan and areas identified as stock pile locations.
4. A maximum roadway grade of 3% to 5% will be maintained on the site, except in grade transition areas (i.e. from greenbelt south to knoll).
5. Fill placed in the area over the planned City of Lacey Sewer Interceptor located along the west property line of the site will not exceed 20 feet of cover, except for limited exceptions as depicted in the City of Lacey Sanitary Sewer Study- East Side of Woodland Creek Valley and Lacey Gateway, dated May 8, 2008, prepared by in the Huitt-Zollars sewer report (reference report) and/or as approved by the City of Lacey Public Works Director.
6. All tree protection, greenways, natural open space and sensitive areas will be protected by chain-link fence and signage and/or other protection measures approved by City, during grading and construction activities. All fencing will be removed upon completion of grading activities.
7. Staging, lay down and stockpile areas will be located in a manner to screen them from view from the adjoining right-of-ways utilizing existing on-site vegetation.
8. To the maximum extent possible, forest duff, topsoil and organic-rich soils excavated from the site during clearing and stripping operations will be re-applied back on the site in suitable locations for landscaping

and soil amendments. All stockpiled topsoil will be covered or otherwise protected to avoid erosion, dust or other such impacts.

9. Prior to grading or other site work soil sampling will be performed on site to test for lead and arsenic contamination.
10. In addition to the above mitigation measures, the City will apply its adopted development regulations pertaining to grading and erosion control to mitigate impacts associated with the grading for Phase 1 the Lacey Gateway Town Center.

Build-out

The following mitigation measures apply to build-out only of Lacey Gateway:

1. Future phases will not be graded until the environmental review and land use application review of the applicable phase is complete. Prior to grading activities occurring for the build-out scenario, an updated comprehensive plan incorporating the result of the environmental review will be prepared.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts are expected to result from the proposed grading.

3.2.2. Air

Existing Conditions

The State Department of Ecology ranks air pollution as one of the top environmental threats facing the region. Young people, the elderly, and those with heart or lung disease, asthma, or challenged immune systems are most susceptible to health risks from air pollutants. High levels of air pollutants can impact human health as well as wildlife and habitat. In addition, documentation of the correlation of green house gas (GHG) emissions and climate change is becoming more and more known. According to U.S. Green House Gas Inventory report produced by the U.S. Environmental Protection Agency, high percentage of total GHG emissions (28%) is attributed to fuel combustion association with transportation, roadway vehicles. In Washington, almost 60% of air pollution is directly related to roadway vehicles. An additional 20% is related to non-road vehicles and equipment.

Air quality is generally assessed in terms of whether air pollutant concentrations are higher or lower than ambient air quality standards set to protect human health and welfare. Three agencies have jurisdiction over the ambient air quality in the project area: the U.S. Environmental Protection Agency (EPA), the Washington State Department of Ecology, and the Olympic Region Clean Air Agency (ORCAA). These agencies establish regulations that govern both the concentrations of pollutants in the outdoor air and contaminant emissions from air pollution sources. ORCAA is a regional agency responsible for enforcing federal, state and local air pollution standards and govern air pollutant emissions from all sources. ORCAA's regulatory code closely parallels the Washington State Department of Ecology's general regulations.

In the 1980s, Thurston County experienced high levels of PM10 (particulate matter less than 10 microns in size). The national standard for PM10 is 150 micrograms per cubic meter, and Thurston County readings in 1985 were approximately 250 micrograms per cubic meter. The major source was fine particles released by smoke from wood stoves and fireplaces. Areas that exceed federal air quality standards are classified as non-attainment areas, and Thurston County was designated as a non-attainment area for PM10. ORCAA set out to reduce PM10 levels by restricting outdoor burning and encouraging more efficient woodstoves. PM10 levels were reduced significantly, and the area was redesignated to a maintenance area in 2000. Readings for PM10 in 2005 were 32 micrograms per cubic meter. The Thurston region is also an attainment area for carbon monoxide and ozone.

ORCAA operates an air quality monitoring network and provides the collected data to Department of Ecology, the Environmental Protection Agency, and the public. Data is collected for particulate matter, ozone, carbon monoxide, sulfur dioxide and meteorological parameters. The data is used to make decisions regarding air

quality management such as the need to impose burn bans and to predict concentrations of air pollutants. Monitoring sites near the project area include Mountain View Elementary School (College St) in Lacey and a new monitoring station located in the Nisqually Valley. ORCAA started monitoring for fine particulates at the Nisqually Valley station in late June 2007, and the air quality index has consistently rated “good” through the end of September. In October, fine particulate levels began to reach “moderate” air quality levels as the wood heating and inversion seasons start and as open burning emissions occur.

Impacts

Development of Lacey Gateway project is consistent with the mixed-use development evaluated in the City of Lacey Comprehensive Plan Environmental Impact Statement, May 1994. Although the Lacey Gateway proposes significantly more grading and more intense development than anticipated in the Comprehensive Plan, no major air emissions will result from the land uses proposed, other than those resulting from vehicles traveling to and from the project site.

Phase 1

Construction of new roads and buildings will have short term impacts to air quality, primarily in the form of dust resulting from construction. Exhaust from heavy equipment used during construction will also result from the proposal. Upon completion of Phase 1, traffic on new roads within the project will increase exhaust emissions within the local area as people travel to the Town Center. Although the project will ultimately have a large interconnected street network at build-out of Phase 1, all new proposed roadways will not be constructed until that portion of the Master Plan is built out. In the interim, fewer roadway interconnections may lead to longer idling time at some intersections, which could concentrate pollutants from auto emissions at these locations.

Even though Phase 1 is regional in nature, it will not have a notable effect on the Interstate due to current high volumes on I-5. On the contrary, as the mix of housing, employment and services are developed, more options will be available for people currently commuting north for employment and services, which would potentially reduce the amount of vehicle miles traveled. There are several strategies that aim at reducing vehicle miles traveled, which corresponds with reducing GHG emissions. Strategies include promoting mixed-use developments of an high intensity/density urban nature in established urban growth areas that integrate housing, employment and services and eliminating the need to travel long distances for work and/or services; and, promoting multi-modal transportation opportunities such as integrating bus routes, transfer stations, park and ride facilities and shared parking opportunities.

Build-out

It is projected that at completion, Lacey Gateway will result in the construction of approximately 6.8 miles of new roads. New roads and approximately 9,000 new evening peak hour vehicle trips projected in the area will result in increased vehicle emissions. Increased population and additional traffic will also contribute to dust during dry weather. However, because of the higher densities proposed in the Master Plan, efforts to promote multi-modal transportation options for residents and employees of the area will have more potential for success, thereby potentially limiting emissions resulting from the project.

The project is composed of retail, office and residential uses similar to those evaluated in the Comprehensive Plan EIS, and no new uses with higher emissions than previously evaluated are proposed in the project.

Mitigation

The Lacey Transportation Plan contains goals to reduce vehicle trips and miles traveled, including managed parking, public education, and support of Intercity Transit’s efforts to expand public transportation services. Zoning and development standards encourage mixed-use developments and promote and accommodate pedestrians, bicycle and transit users, including use of connected road systems, safe and accessible transit stops, pleasant, safe and attractive streets and sidewalks, and pedestrian connections between buildings. A network of streets and conveniently located pedestrian corridors increases the number of multi-modal

connections, reduces the distance to destinations or transit stops, provides route options, reduces vehicle miles traveled, reduces the need for road widening, and makes delivery and emergency service more efficient.

The availability and cost of parking strongly influence whether people choose to make their trips by automobile; therefore, parking management is a critical element in travel demand management (TDM). Parking management strategies may include providing common parking facilities among adjacent land uses and establishing appropriate maximum parking standards.

Although the proposed Lacey Gateway adds more residential units than envisioned in the Comprehensive Plan, the increased density in the Gateway area will better support mass transit and other commute options. Design of Town Center also encourages patrons to park their vehicle once and then walk between their various destinations. The potential for air pollutants due to traffic will be decreased due to residents living, working and recreating in the Lacey Gateway Town Center.

At full build-out, a regional transit center and parking structure are anticipated to be incorporated into the project. Such a facility would reduce the number of vehicles commuting from Lacey Gateway Town Center, as well as the number of vehicles used for commuting on I-5 to the east and west of the Town Center.

Mitigation Measures

Phase 1

The following mitigation measures all apply to Phase 1 of Lacey Gateway Town Center:

1. Dust suppression techniques such as applying water to disturbed soils, covering stockpiles or hydro seeding will be incorporated with grading and construction activities. Water trucks will be kept on site at all times during construction. A dust control plan will be developed in conjunction with the comprehensive grading plan.
2. Coordination with Intercity Transit to establish transit service to Phase 1 will occur prior to the development of Phase 1 and to develop a long term plan identifying potential transit opportunities such as locations and timing for the development park and ride facilities, transfer stations, or other alternative modes of transportation.
3. The City will review the policy intent for prohibiting park and rides within the Hawks Prairie Business District and make appropriate revisions to City Codes to promote transit alternatives within the Hawks Prairie Business District Zoning Classification.
4. Transportation Demand Management (TDM) strategies such as transit-friendly design, pedestrian and bicycle corridors that reduce single occupancy vehicle dependence and improve air quality will be incorporated into the project design for Phase 1. TDM strategies will be reviewed and implemented through the City's site plan review process.
5. Olympic Region Clean Air Authority regulations will be met during construction activities and the operation of potential uses associated with Phase 1.
6. All proposed uses that locate within Phase 1 that are considered Major Employers as defined by RCW 70.94.524 will develop and implement programs to reduce drive-alone commute trips and encourage use of alternative transportation modes, compliant with the Washington State Commute Trip Reduction (CTR) Law. The City will provide guidance and oversight to employers in the Lacey Gateway to ensure CTR programs are implemented.
7. Construction vehicles and delivery trucks will be routed and scheduled to avoid peak travel times and not be left idling on site to reduce the amount of drive time and vehicle emissions.
8. Construction vehicle emissions will be reduced by the limitation on the grading to balance the materials on site and immediate vicinity of project site.

9. In addition to the above described mitigation measures, the City will apply its adopted development regulations pertaining to air quality and building construction to mitigate air quality impacts associated with Phase 1 development.

Build-Out

The following mitigation measures apply to build-out of Lacey Gateway:

The environmental review and land use application for the portion of the Master Plan within the build-out stage will consider the potential for increased local and regional transit opportunities, the potential to implement transit oriented development and other forms of TDM strategies.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts to the air are expected to result from the Lacey Gateway project.

3.2.3 Water

This section describes existing conditions, impacts, and mitigation measures for surface and ground water. In accordance with Washington State SEPA regulations, this evaluation addresses surface and ground water quantity, quality and flooding.

Existing Conditions

Surface Water

Quantity and Quality

Six small Category III & IV wetlands (all less than 2,500 sf) are on the site. The nearest stream is Woodland Creek, located approximately 3/4 mile to the west of the site. The Woodland Creek drainage basin is the primary surface water basin within the City of Lacey. A 2006 study by the Washington Department of Ecology has shown fecal coliform bacteria pollution in Woodland Creek downstream of Martin Way. Woodland Creek is one of the primary sources for fecal bacteria pollution in Henderson Inlet, with much of the pollution entering the creek downstream of Martin Way. The DOE study concludes that bacteria loads to the creek must be reduced in order for the creek to be in compliance with surface water quality standards. Surface water from Lacey Gateway is not expected to make its way to Woodland Creek due to the lack of streams or other watercourses on site.

Wetlands are considered a surface water feature, and four Category III and two Category IV wetlands are present on the site. Analysis of wetlands is included in Section 3.2.D. Plants and Animals.

Groundwater

Quantity and Quality

As noted above, the Lacey Gateway project is entirely located within the Woodland Creek watershed. During summer months, the majority of flow in the creek is provided by groundwater inflow, and consequently the creek is affected by groundwater quality. Woodland Creek has the highest nitrate concentrations in the Henderson basin, and a 2006 Department of Ecology study determined that a significant amount of the summer nitrate load to Woodland Creek enters by way of groundwater. A pollutant load reduction study currently underway by Thurston County is evaluating methods for reducing nitrate loads to groundwater within the Woodland basin, which include reducing nitrate loads from on-site septic systems in specific areas of the basin. The Cabela's site is currently served by an on site temporary force main connected to the public sewer system. The future phases of the Lacey Gateway project will be served by municipal sewer service.

Groundwater protection is an important concern, since most of the drinking water for Lacey residents is obtained from underground aquifers. Aquifers are porous formations below ground that hold water. There are four aquifers located in the study area, the Vashon Recessional (Qvr), the Vashon Advance (Qva), the Sea Level Aquifer System (SLAS) and Undifferentiated (Qc). The Qva, SLAS and Qu aquifer system supply

the City's currently active supply wells (City of Lacey 2003 Water System Comprehensive Plan).

Aquifer recharge can come from precipitation or movement of groundwater from one aquifer to another. As precipitation infiltrates into the ground, it can carry contaminants found on the ground or located in the soil.

Surface hydrology and the direction of subsurface flow in the area are not obvious due to the lack of nearby surface water. Because the higher elevation soils to the north are mapped as Alderwood, which typically has impermeable till at between 3 and 4 feet in depth, it is assumed that local subsurface flow is lateral across the till layer to the south and to the southwest (Pacific Rim Soil & Water, Inc., September 6, 2006). Once the subsurface flow hits the deep extremely gravelly Spanaway and Everett soils, subsurface flow could continue to the south under the freeway through the deep gravel deposits, or to the west across a deep till surface. The groundwater level in the project area is generally at 3 feet to more than 19 feet. (Shannon & Wilson, Inc., February 9, 2007)

Stormwater

The Lacey Gateway development is planned to be constructed in multiple phases. Phase I includes a varied mix throughout the project of commercial, retail, multi-family and public use facilities and park/community/open spaces. There is a portion of Phase I (referred to in the drainage report as Phase 1A and later in this section as Pre-Phase I Development) that has been completed to date. This portion includes Gateway Boulevard, Cabela's and the roundabout at the intersection of Britton Parkway and Gateway Boulevard. There is currently a project under construction along Britton Parkway to construct an additional east bound lane from the Gateway Boulevard roundabout to Marvin Road. Stormwater for this portion of Britton Parkway has been collected in catch basins and conveyed to an off-site facility for treatment and infiltration.

Pre-Phase I Development

The pre-Phase I development constructed a number of improvements to the regional stormwater facilities. These are presented on the attached Regional Drainage Plan. The total tributary area included in this phase was 39 acres. This includes the Cabela's property of approximately 28 acres. These improvements include stormwater catch basins and stormwater mains at the roundabout at Gateway Boulevard and Britton Parkway and extending down Gateway to Main Street. The stormwater main along the south side of the greenbelt open space between Gateway Boulevard and Western Parkway and extending down Western Parkway to the regional storm pond was also constructed. A smaller constructed wetland and a portion of the infiltration trench was also constructed. The constructed wetland consumes approximately 1.5 acres. The area used for the infiltration gallery is approximately 0.25 acres.

Development projects are required to mitigate stormwater impacts through the use of stormwater management systems that provide stormwater collection and conveyance, water quality treatment which remove pollutants, and water quantity control which control the release rate of stormwater from the site. Collection and conveyance systems are typically catch basin and pipe systems. Water quality treatment facilities are features such as biofiltration swales, wet ponds, and constructed wetlands. These facilities remove stormwater related pollutants such as sediments, heavy metals, and oils. Water quantity control facilities are generally either detention or retention (infiltration) systems. Currently, there are no stormwater conveyance lines within Britton Parkway for stormwater overflow (required for detention), therefore, stormwater quantity control systems for the Lacey Gateway project will be retention systems that dispose of treated runoff via infiltration into the ground. Examples of retention systems are open infiltration ponds and infiltration galleries or trenches.

Flooding

The Flood Insurance Study for the City of Lacey, 1980 designated and mapped flood hazard areas in the City of Lacey. These Flood Insurance Rate Maps (FIRM) indicate the floodway and flood plains, which in Lacey

are generally located adjacent to streams and lakes. Areas designated as 100-year flood plains have a 1% chance of being flooded in any given year. FIRM Community Panel Numbers 530188 0185C and 530188 0205C indicate that the entire Lacey Gateway site is in Zone C, an area of minimal flooding, and no portion of the site is within a 100-year floodplain.

Impacts

Impervious surfaces prevent natural infiltration and thereby increase the amount of runoff and pollutant concentrations. Clearing and grading during construction increase the risk of erosion and sedimentation. Construction equipment on site poses risks to groundwater due to fueling and other maintenance activities that may occur on site.

Surface Water Impacts

Changes in surface water flows could potentially impact four small Category III and two Category IV wetlands on the site; these wetlands are planned to be relocated to one central constructed wetland in an effort to improve overall functions and values of the wetlands and meet the intent of the urban style development. No other surface water impacts are anticipated from the construction of Phase 1 or build-out of Lacey Gateway.

Groundwater Quality and Quantity Impacts

The project area is located in a critical aquifer recharge area classified as "Category 1, extreme aquifer sensitivity" by the City of Lacey. The closest City of Lacey well to Lacey Gateway is Well No. 29, also known as the Betti well, which is located along Marvin Road, just north of 29th Avenue NE. This well draws from the Qc aquifer, and its wellhead protection area extends into the Lacey Gateway project area. The City of Lacey is applying for additional water rights for this well, and consequently the wellhead protection area could expand further into the project area in the future. The City is also currently drilling two new wells in the Qu aquifer along Marvin Road between Hawks Prairie Road and Willamette Boulevard; however, it is unlikely that the wellhead protection areas for these deeper wells will extend into the Lacey Gateway project area.

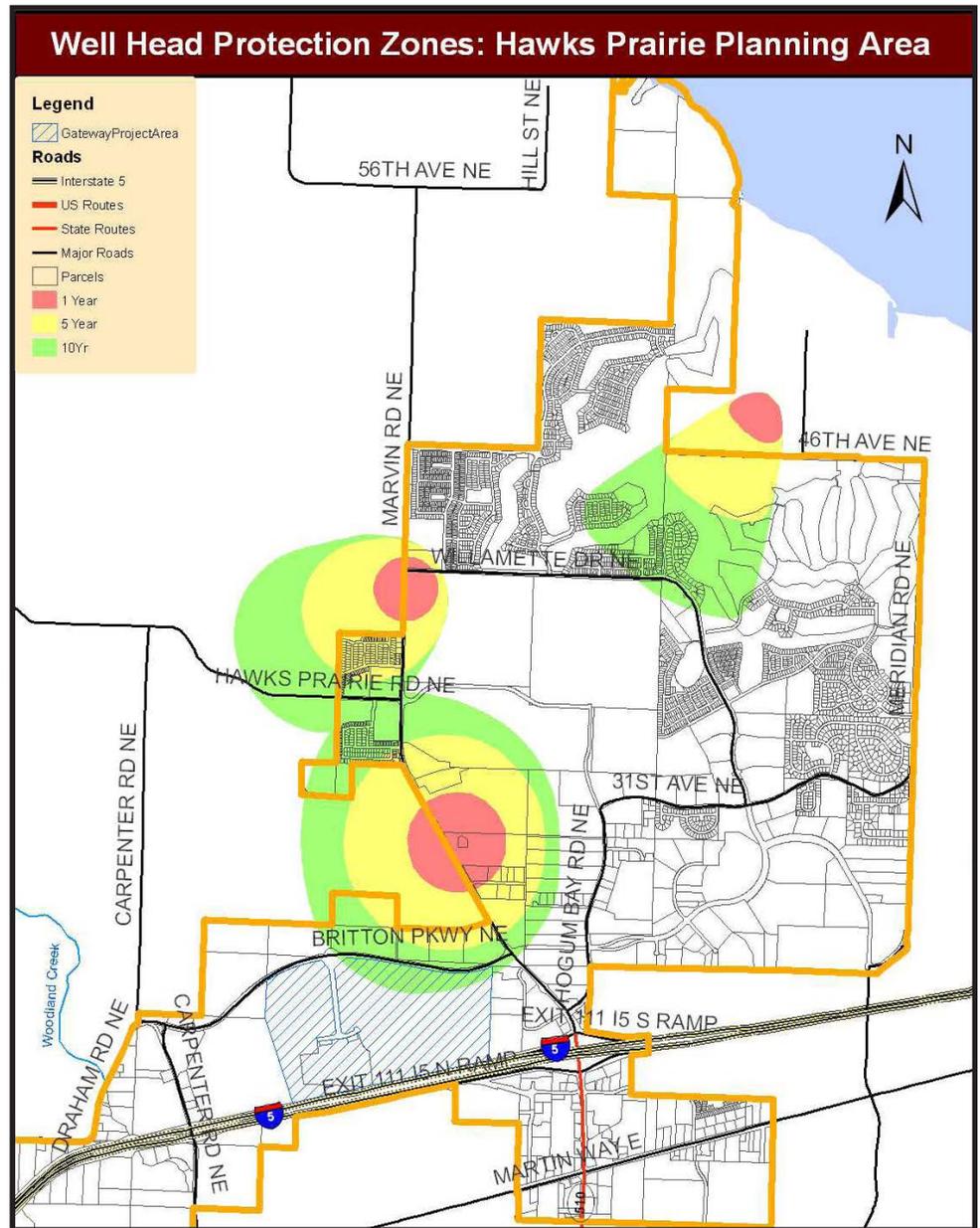


Figure 3.3 - Well head protection zones

Construction activities could have impacts to groundwater resources should an accidental spill or leak

of petroleum products or other potential water polluting material occur. For example, onsite fueling of construction vehicles and equipment could result in spills of gasoline or diesel or runoff collected from impervious surfaces picks up pollutants such as dust, oil and other particulates that accumulate on roadways. This runoff is treated in stormwater facilities located in the southern portion of the site.

Impacts to groundwater quality will be minimized through the design and construction of a stormwater collection, treatment and infiltration system described further in the *Stormwater Impacts* section below.

The Lacey Gateway project is within the City of Lacey’s water service area and will increase the demand for potable water. To date, the City of Lacey has committed to the provision and availability of sufficient potable water to serve the development planned for Phase 1. Specifically, an agreement between the applicant and the City committed the City to serving the first 1,000,000 square feet of retail/commercial/office and 500 residential units. In order to quantify this demand the proposed mix of land uses were applied to the water consumption ratios shown below, resulting in 227,300 gallons per day (gpd). Demand beyond 227,300 gpd would need to be met through use of reclaimed water or purchase of additional water rights by the developer.

Water demand varies greatly between various land uses. Homes, health clubs and restaurants have high water use rates, while retail and office uses have comparatively low water use rates. The table below shows the anticipated potable water demand of the types of uses proposed within the Lacey Gateway project.

Table 3-2 - Estimated Water Consumption by Land Use Type*

Land Use	Demand (gallons/day)	Unit
Retail	20 gpd	Per 1,000 sf
Restaurant	50 gpd	Per seat
Office	50 gpd	Per 1,000 sf
Multi-family	200 gpd	Per dwelling
Hotel	50 gpd	Per room
Cinema	5 gpd	Per seat
Civic use	50 gpd	Per 1,000 sf
Health	100 gpd	Per 1,000 sf

*Source: Hatton Godat Pantier, January, 2009.

Water demand for the Lacey Gateway project at Phase 1 and build-out has been estimated using the consumption rates in Table 3-3 below and applying those to the proposed sizes of each land use type. Table 3-3 below summarizes estimated potable water demand of each phase of the Lacey Gateway project.

Table 3-3 - Estimated Potable Water Demand (gpd) *

	Phase 1 (gpd)	Future Phases	Total
Retail	16,860	21,700	38,560
Restaurants	100,000	25,000	125,000
Office	5,000	45,000	50,000
Multi-family	100,000	400,000	500,000
Hotel	13,500	18,750	32,250
Civic uses	1,500	2,500	4,000
Cinema	8,000	0	8,000
Health	4,000	0	4,000
Total (gpd)	248,860	512,950	761,810

*Source: Hatton Godat Pantier, January, 2009.

Phase 1 of the Lacey Gateway project will have a direct impact to groundwater resulting from demand for potable water. The demand is anticipated to be offset in part by the use of reclaimed water for irrigation and toilet flushing. As the project develops and reclaimed water becomes available, other uses for reclaimed water may also be incorporated into the project.

Table 3-4 below shows the estimated reclaimed water demand by each of the uses within the Lacey Gateway.

Table 3-4 – Estimated Reclaimed Water Demand

Proposed Use	Gallons Per Acre Per Day (gpad)	Gallons Per Acre Per Minute (gpam)⁽¹⁾
Irrigation	9,775 gpad	7 gpam
Residential	9,303 gpad	6.5 gpam
Commercial	1,000 gpad	0.7 gpam
Government	330 gpad	0.2 gpam
Office	330 gpad	0.2 gpam
Mixed-use	1,200 gpad	0.8 gpam

⁽¹⁾ Gallons per acre per day/1440 (minutes/day)

Source: Huitt-Zollars, Inc., Reclaimed Water Study, rev. January 7, 2008

The Reclaimed Water Study prepared by Huitt-Zollars, Inc. in September 15, 2008 is provided in Appendix D.

Current Department of Health regulations require that water systems maintain a minimum pressure throughout their distribution systems of 30 psi during peak hourly demand and 20 psi during a fire event at maximum daily demand (WAC 246-290-230). Future fire protection needs are estimated to be as high as 4000 gpm for a four-hour duration based on the International Fire Code 2006 and LMC 14.07.

If an extended period of time occurs between the construction of the initial infrastructure and actual build-out of Lacey Gateway, water may be allowed to age in the transmission mains required for fire protection.

It will be necessary to monitor and sample the water to ensure the water quality doesn't degrade.

Stormwater Impacts

Development increases impervious surfaces in the form of roofs, sidewalks, roads and parking lots. As water runs off these surfaces, it picks up pollutants such as oil, fertilizers, pesticides, soil and animal waste. Untreated stormwater can contain heavy metals, organic compounds, bacteria and viruses. Conversion of undeveloped land to buildings, roads and parking lots increases impervious surface and concentrates the infiltration of rainwater into the ground at the location of stormwater treatment and infiltration facilities, and scattered open space areas.

Impervious surfaces (roadways, buildings, parking lots, and sidewalks) will increase as development occurs. Phase 1 construction of the Lacey Gateway will add 106.25 acres of new impervious surfaces (85% of Phase 1 site). This includes approximately 30 acres of building coverage, 30 acres of roads and 46.25 acres of surface parking.

At full build-out of the Lacey Gateway project site coverage is expected to consist of 212.5 acres impervious surfaces (85% of site), including 63.75 acres of building footprint, 55 acres of roads and 93.75 acres of surface parking.

Evapotranspiration occurs when plants secrete water through their leaves (transpiration) and as water is lost (evaporated) to the atmosphere from the ground surface. Although the amount of water that plants transpire varies greatly depending on a number of factors such as temperature, humidity, sunlight, wind and

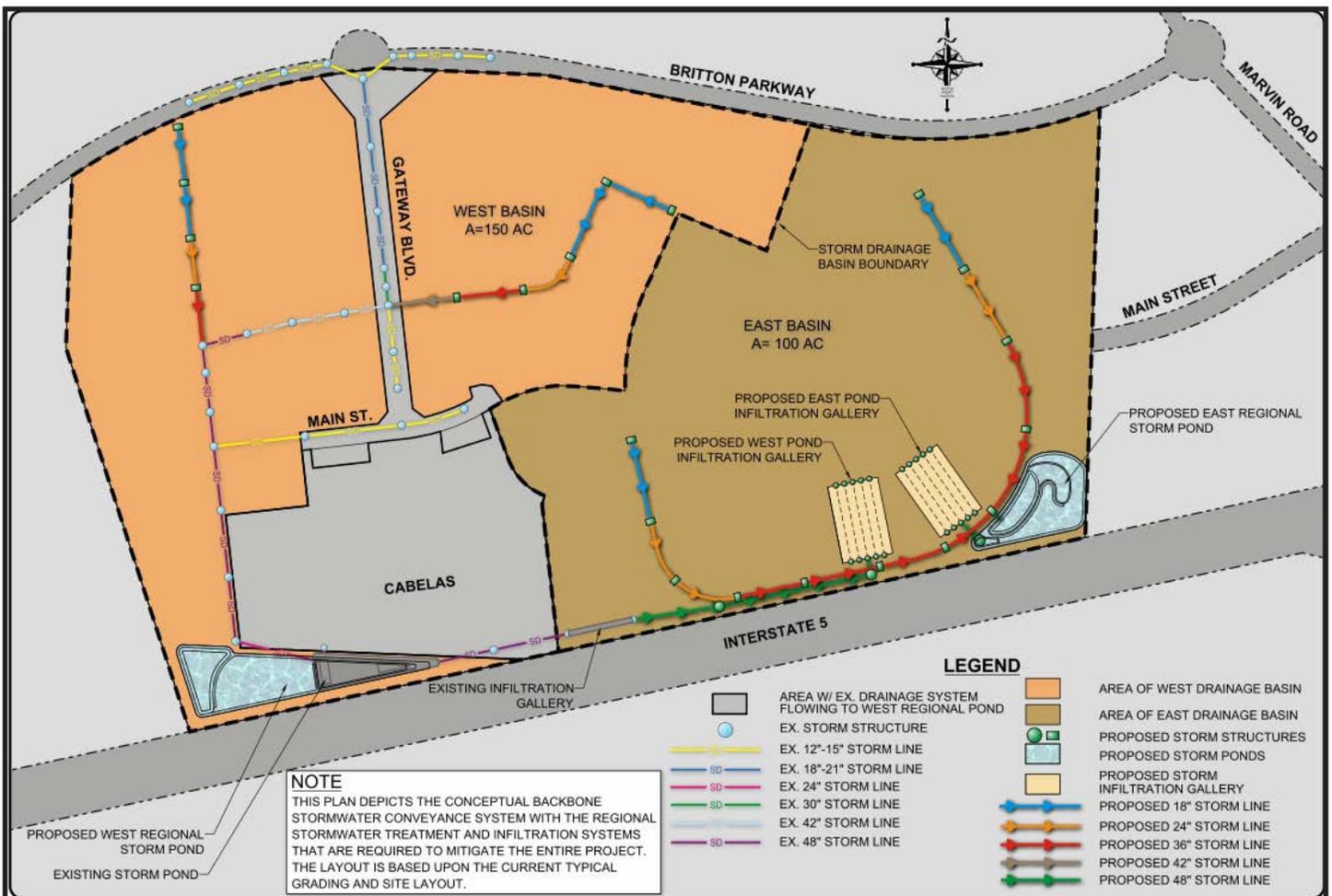


Figure 3.4 - Proposed stormwater plan and drainage basins on the Lacey Gateway site

slopes, a single mature tree can evapotranspire up to 40 gallons of water in a day. As trees and vegetation are removed, water that was previously lost to evapotranspiration becomes runoff that infiltrates into the ground and local aquifers.

Proposed On-site Stormwater Facilities

The Lacey Gateway will include an extensive stormwater collection, treatment, and disposal system designed to capture runoff, remove contaminants, and infiltrate the treated stormwater into the ground. Construction of the stormwater management facilities for the proposed development will be phased. Each phase will provide stormwater conveyance systems consistent with the preliminary drainage report to convey the expected stormwater flows from that phase to the regional facility.

Figure 3-4 above illustrates the drainage basins on the Lacey Gateway site.

Phase 1

There is a portion of Phase I (referred to in the drainage report as Phase 1A and in this section as Pre-Phase I Development) that has been completed to date. This portion includes Gateway Boulevard, Cabela's and the roundabout at the intersection of Britton Parkway and Gateway Boulevard.

In planning this project, a "worst-case scenario" approach to the regional storm system was utilized. The total project tributary area includes approximately 250 acres. For the purposes of the stormwater design, the assumption of 85% coverage with impervious surface was used and all onsite stormwater was routed to the stormwater facilities located along the I-5 corridor.

The detailed analysis in the preliminary drainage report divides the project up into two basins; west and east. These two basins ultimately drain to the regional constructed wetlands for treatment and then to the infiltration galleries. Since a majority of the stormwater facility is located within the Phase I area, the full build-out stormwater system is shown on the exhibit and is expected to be constructed during Phase I. The soils on the western portion of the site are comprised of glacial till at or near the surface, a condition that limits the site's infiltration characteristics, which limits the functionality of rain gardens. However, soils located in the south-eastern portion of the site consist of well-drained gravels and are therefore well suited for locating the infiltration facilities. For this reason, the regional infiltration facilities were located in that general area.

Phase I:

Phase I includes a total tributary area of 120 acres. To provide stormwater conveyance, treatment, detention and infiltration for Phase I, the following proposed improvements are required to be constructed:

Conveyance: Figure 3.4 displays the regional stormwater main pipe sizes required for the regional system to function. The stormwater system for individual block layout parking lots will be provided during the detailed construction design phase.

Phase 1 drainage is divided into three separate drainage sub-basins. The northwest portion of Phase 1 will collect runoff in pipes that vary in size from 12 to 24 inches and will be located beneath the roadways. These new pipes will connect to the existing main trunk line in Gateway Boulevard that was constructed for Cabela's. Runoff will be collected and directed to the existing constructed wetland which will be expanded to accommodate the increased flow. After runoff is treated in the wetland, it will be conveyed to the existing infiltration gallery which will also be expanded. This gallery will be expanded to accommodate the drainage from this drainage sub-basin as well as the second drainage sub-basin, and is located along the southern property boundary adjacent to I-5.

The second drainage sub-basin for Phase 1 includes runoff from the central portion of the site and associated areas. Runoff from these areas will be collected and conveyed in pipes that vary in size from 12 to 36

inches and are located beneath the roadways. These conveyance pipes will then direct the runoff to a newly constructed wetland in the southeast portion of the site adjacent to I-5. This wetland has been sized to accommodate flows from this Phase I only. Runoff from this wetland will then be conveyed to the expanded infiltration trench along the southern property boundary.

The third drainage sub-basin for Phase 1 is along the eastern edge of the property. Piping for this basin consists of 24 and 36 inch pipe that will connect to stormwater management systems proposed in Phase 2.

Treatment: The regional three-celled constructed wetlands are shown in Figure 3.4. The total area required for the proposed wetland cells in the east basin includes approximately 3.5 acres. The proposed wetland cells in the west basin will be built on approximately 4.5 acres. This will be further refined during the detailed construction design phase.

Detention: Since the best location for the infiltration facility is located within Phase I of the project, the infiltration gallery for the entire project is planned to be constructed during Phase I. The infiltration gallery required for full build-out of the project is expected to be located under the parking lots in the south-eastern portion of the site. A combination of infiltration galleries and excess storage volume over the constructed wetlands will be utilized to provide the required storage volumes.

Infiltration Gallery: The proposed infiltration gallery for the project connects the existing three runs of pipe to the gallery located within the parking lots to the east. The infiltration gallery was sized using a soil infiltration rate of 20 inches per hour.

The Regional Drainage Plan, prepared by Hatton Godat Pantier in January 2009 is provided in Appendix E.

Mitigating Measures

Phase 1

The following mitigation measures all apply to Phase 1 of the Lacey Gateway.

Groundwater

1. An Integrated Pest Management Plan (IPMP) will be developed for all open space, landscape and community areas located in Phase 1. The IPMP will describe best management practices for the application of pesticides, herbicides and other applicable maintenance activities that protect groundwater sources located within areas of extreme aquifer sensitivity. Landscaping in public areas will incorporate drought-tolerant plants and native plants.
2. The City of Lacey will apply criteria for protection of critical aquifer recharge areas and wellhead protection areas. For critical aquifer areas that are not in wellhead protection zones, spill prevention and contamination will be considered during project review to avoid accidental release of pollutants. Review for presence and containment of hazardous materials shall be performed and conditions shall be set by the City.
3. Any use proposed within the designated ten-year time of travel zone as described on Figure 3-3, which uses, stores, handles or disposes of hazardous materials will submit documentation to the City for approval that all known, available and reasonable methods of prevention, control and treatment (AKART) will be implemented. AKART may include pollution prevention plan development and implementation engineering solutions, and practices deemed necessary to prevent release.
4. If undocumented wells are found during construction, the wells will be assessed and either protected or properly abandoned.
5. Water availability for Phase 1 is committed to 227,300 gallons per day to serve the approximately 500 residential units and 1,000,000 square feet of retail/commercial/office buildings. In order to protect

groundwater resources and conserve them for public consumption, the Lacey Gateway will utilize reclaimed water for non-potable purposes, such as irrigation of landscaped areas and toilet flushing.

6. Demand for water to serve in excess of 1,000,000 square feet of development and 500 residential units in Phase 1 may be considered if records demonstrate actual water use for the proposed development will not exceed the water commitment provided for Phase 1 (227,300 gpd).
7. In addition to the above mitigation measures, the City will apply its adopted development regulations pertaining to stormwater management and well head protection areas to mitigate potential impacts to groundwater and private and public water supplies.

Surface Water

1. Vehicle tracking of mud offsite will be avoided by the installation of a stabilized construction entrance installed prior to the start of construction at each construction entrance to the site. In addition, washing down roads daily to remove excessive mud may be required. Wash water will be directed to the temporary sediment traps installed onsite and will not be allowed to discharge offsite without treatment.
2. A centralized equipment marshalling and containment area will be provided onsite for equipment maintenance and storage of any equipment and service materials. An area onsite will be selected as a temporary debris and stockpile area for materials that will be removed from the site. Erosion control containment and berming of this area will be provided for pollutant containment and sheeting provided for coverage or lining if applicable.
3. In addition to the above mitigation measures, the City will apply its adopted development regulations pertaining to soil erosion to mitigate impacts associated with site disturbance and construction activities.

Stormwater

1. Construction on the site will be conducted in accordance with the construction sequence described on the plans and in the Lacey Gateway Preliminary Drainage and Erosion Control Report (Hatton Godat Pantier, January, 2009). Deviations from this sequence will be approved by the project engineer and the City of Lacey prior to any site-disturbing activity not contained within the plans.
2. For best infiltration facility function, a licensed geotechnical engineer will perform an analysis of the stormwater facility locations and provide recommendations for appropriate vertical separation between the facility base and any restrictive layer. Following completion of site grading, infiltration rates will be tested at facility locations. The stormwater plan and design will be modified as needed, based on findings of post grading infiltration testing.
3. Upon completion of construction, in-situ stormwater infiltration rates will be determined and compared to the design rate for each infiltration facility. If the infiltration rate used for design of the facility is not achieved, additional stormwater measures will be implemented, which may include directing roof drainage to rain gardens or drywells on each development pad, locating storm facilities in multiple locations, expanding the design capacity of the facility to accommodate the actual infiltration rate.
4. The Low Impact Development Technical Guidance for rain gardens or similar facility designs may be incorporated into Phase 1 to accommodate stormwater.
5. A Stormwater Pollution Prevention Plan (SWPPP) will be prepared prior to and implemented during grading activities onsite. If inspections and monitoring reveal actual or potential discharge of sediments or pollutants, the SWPPP will be updated as necessary.
6. A tabulation of impervious and pervious area constructed shall be maintained as each project within Phase 1 is constructed to ensure design thresholds of the receiving stormwater facilities are not exceeded. As each project is constructed, a tabulation of proposed pervious and impervious areas must be provided to the City. If it is determined that the assumed areas used for design are exceeded, the project(s) causing the impervious areas to go beyond the limit will need to expand existing facilities or provide additional facilities to accommodate the additional impervious area.

7. The infiltration facilities proposed underneath the parking lots in the southeast portion of Phase 1 will be installed at the time the site is initially developed despite the fact that the galleries are intended to serve development of future phases.
8. The location of all trees within the greenbelt along I-5 will be surveyed prior to any grading activity in the vicinity. High quality stands of specimen trees as defined by LMC 14.32.030 will be incorporated in the stormwater system design and be protected during construction.
9. In addition to the above mitigation measures, the City will apply its adopted 1994 Edition of the Drainage Design and Erosion Control Manual to stormwater generation, facilities and infrastructure to mitigate impacts associated with stormwater.

Build-out

The following mitigation measures apply to full build-out only of Lacey Gateway.

Groundwater

1. Any additional housing units above the 500 allowed for Phase 1 will require a Comprehensive Plan amendment to review the request to increase residential densities within the Hawks Prairie Business District.
2. The environmental review associated with Comprehensive Plan amendment application for the build-out scenario of the Master Plan will include a review of the increase in residential units proposed through a water demand analysis and comparison with water availability within the City.

Surface Water

1. Surface parking lots in some portions of the project as shown on Figure 3-1 may be converted to above ground parking structures to reduce the amount of area covered by surface parking lots.

Stormwater

1. An evaluation of how existing stormwater systems are functioning and the actual infiltration rates being achieved shall be prepared, and all applicable findings will be incorporated into the design of the storm facility(s) to accommodate future development.

Significant Unavoidable Adverse Impacts

No significant unavoidable impacts to groundwater quality or surface water would result from the project. Development of Lacey Gateway will result in an increase in groundwater being infiltrated due to loss of evapotranspiration potential of existing vegetation; however, impacts will be minimal. There will be a significant and unavoidable increase in demand for potable water resulting from the proposal.

No significant unavoidable adverse impacts associated with stormwater are anticipated by development of Lacey Gateway.

3.2.4 Plants and Animals

This section describes the existing vegetation and wildlife on the project site, including the potential presence of any threatened, endangered, or sensitive species and the potential effect of the project on vegetation and wildlife. It is based on information contained in technical reports submitted to the City by Washington Forestry Consultants and EnCo Environmental Corporation. These technical reports are available in Appendix F

A tree and vegetation inventory was conducted by Washington Forestry Consultants on August 28, 2006 (Lacey Gateway Preliminary Tree Protection Plan) using variable plot sampling. The data was processed using SuperAce, a forest inventory software package. Understory vegetation was assessed by observing the vegetation during the course of the overstory inventory.

The presence or absence of priority habitats was determined based on observation, inspection, research and interpretation of information from the Washington Department of Natural Resources (WDNR) Natural

Trees and Vegetation

The 250-acre project site includes sparsely to heavily forested areas with individual clusters of trees, scattered large stands of trees, and several non-forested areas. The gaps in the stand and non-forest areas are vegetated with Scotch broom, ocean spray, blackberry, broadleaf weeds, and grasses. The tree inventory conducted for the project broke the property up into several forest type areas as described below. The Figure below shows the location of each forest type.

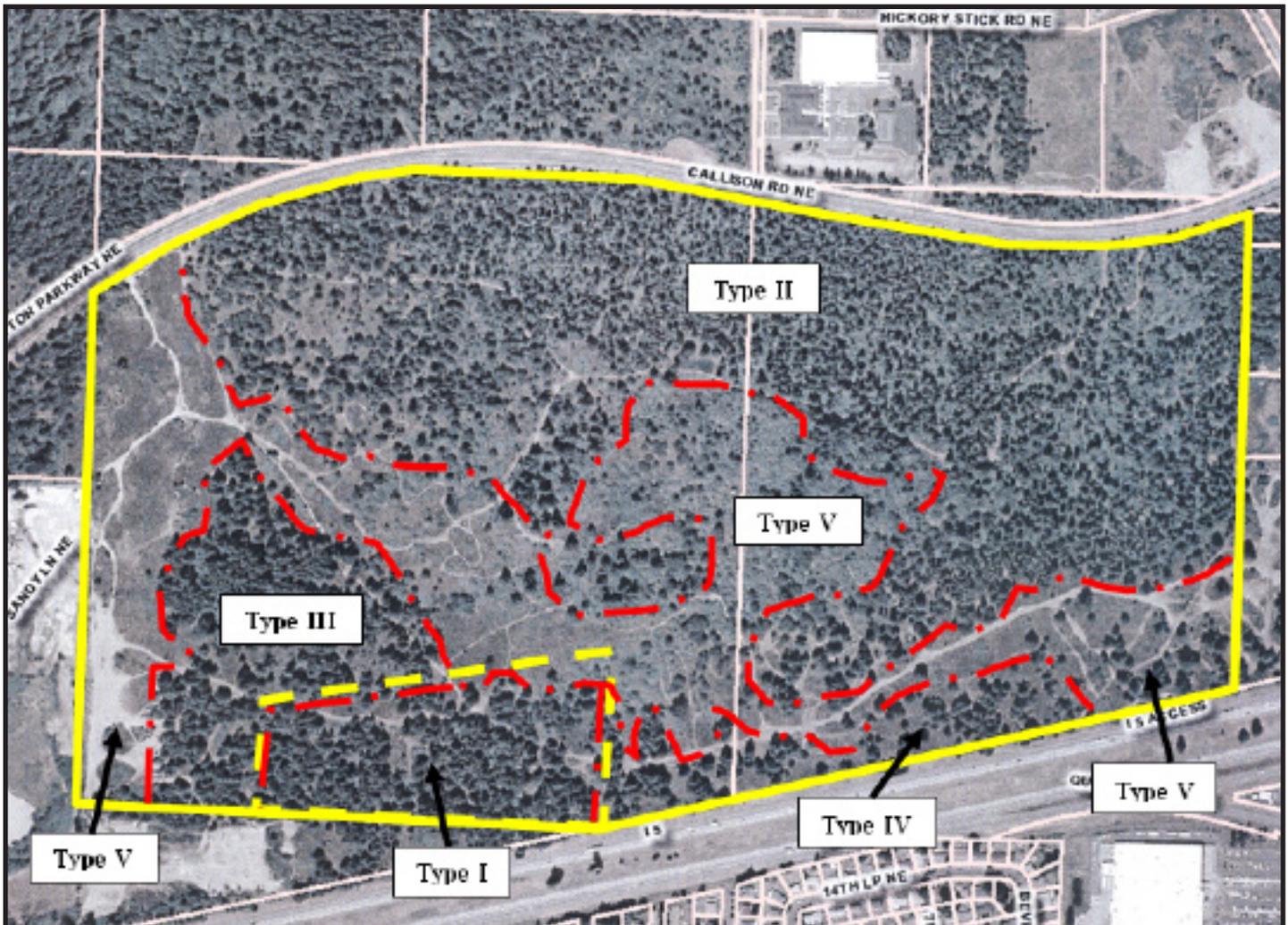


Figure 3.5 - Forest cover types on Lacey Gateway Town Center site

Phase 1

Forest Cover Type II is the largest forest cover type within the project study area. It occurs in the north central and eastern half of the site and contains Douglas fir predominantly with lesser numbers of Oregon white oak and big leaf maple. The diameter at breast height (DBH) range is 7-35 with approximately 150 trees per acre. A portion of Phase 1 of the Lacey Gateway project is covered with Type II forest cover. The condition of most of the trees within Phase 1 is fair, with several areas of diseased trees. The understory is dense, with salal, western hazelnut, Oregon grape and ocean spray being the dominant species.

Forest Cover Type IV is a 13-acre area located along the I-5 frontage. It is predominantly Douglas fir with some scattered Oregon white oak. The highest quality Douglas firs are found in this area and no significant

insect or disease problems were found.

Forest Cover Type V is 80-acres in the middle and southeast corners of the site. This type is barren in some areas, covered with Scotch broom and other invasive species in some areas, and has a few Douglas firs and Oregon white oaks. Most trees in this area are small seedlings and saplings.

Forest Type III consists of 23 acres to the north of the Cabela's site. It contains Douglas fir, Oregon white oak and Pacific Madrone trees in fair to good condition. No significant insect or disease problems were noted. The remainder of the northern half of the site is Forest Type II as described above.

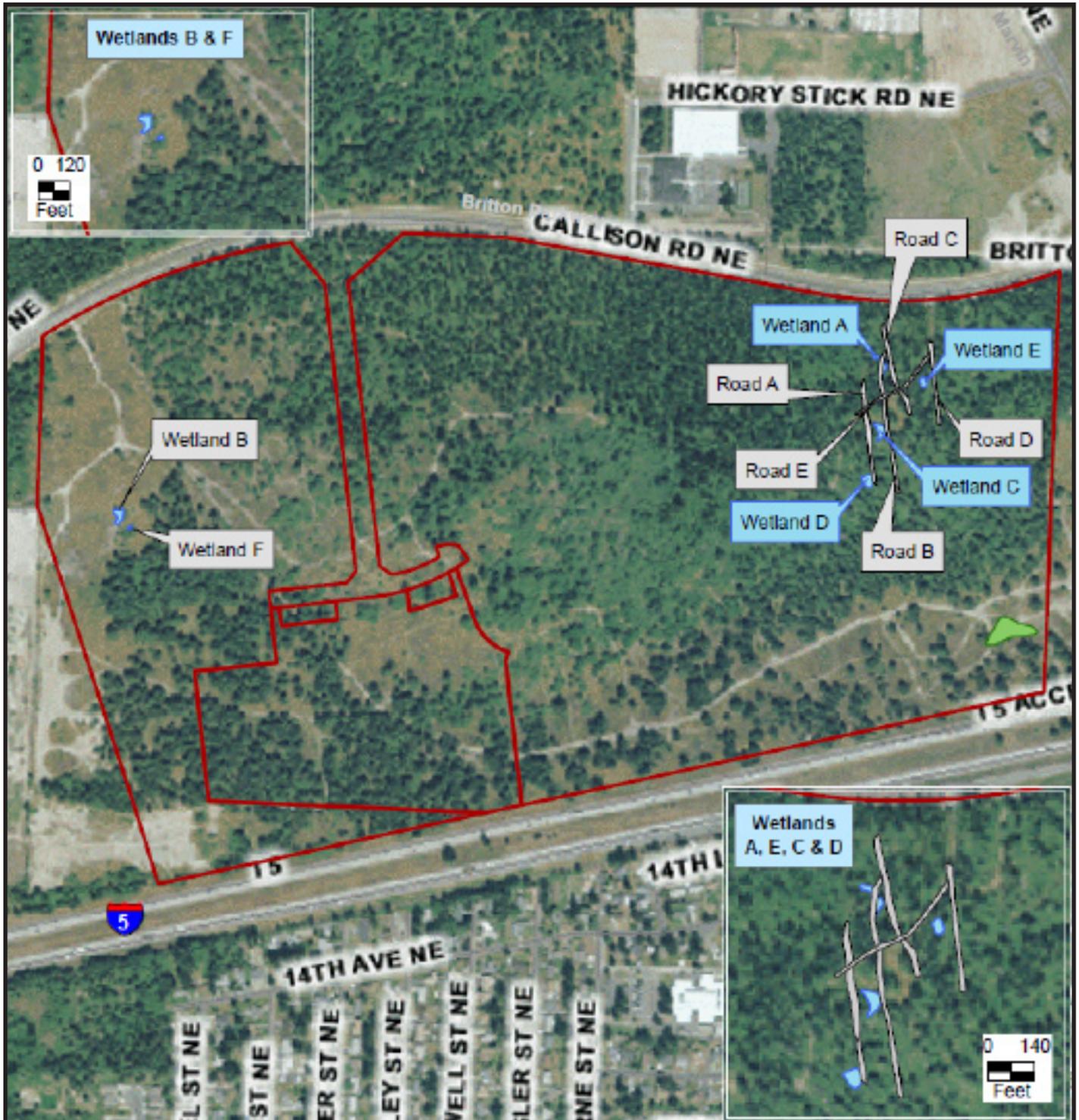


Figure 3.6 - Wetland locations on Lacey Gateway Town Center site

Wetlands

Wetlands are defined as “areas that are inundated or saturated by surface water or groundwater at a frequency and duration to support and under normal circumstances, do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.” Wetlands provide specific ecological benefits to the City, including groundwater recharge, flood control, and stream flow maintenance, as well as provide habitat for a variety of plants and animals.

EnCo Environmental Corporation was retained to evaluate the site, identify, delineate and characterize any wetlands on site. Wetlands were identified by determining the presence of three characteristics as described above and in the Army Corps of Engineers 1987 Manual. EnCo determined the site is not complex or atypical, and therefore used the Routine Wetland Determination method with emphasis on all three criteria: vegetation types, soil characteristics, and hydrologic conditions. Six isolated wetlands meeting the technical requirements for being wetlands were found on the site. According to the report, all wetlands are less than 2,500 square feet in size and all scored low to very low in function and value. According to Enco's evaluation, all of the wetlands were highly disturbed by historic logging, thinning and other land clearing activity. (Critical Area Report prepared by EnCo Environmental Corporation, August 28, 2008).

Table 3-5 Wetland Characteristics (On-Site & Field Verified)

Land Feature	Area	Isolated	Level of Disturbance	Artificial Nature	Water Quality Score & Function Level	Hydrologic Score & Function Level	Habitat Score & Function Level	Total Function Score & Category
Wetland A	2,457 ft ²	Yes	Very High	Suspect	12 LOW	10 LOW	16 LOW	38 Category III
Wetland B	2,063 ft ²	Yes	Very High	Definite	2 VERY LOW	6 VERY LOW	15 VERY LOW	23 Category IV
Wetland C	2,164 ft ²	Yes	Very High	Likely	10 LOW	10 LOW	18 LOW	38 Category III
Wetland D	2,364 ft ²	Yes	Very High	Suspect	14 LOW-MODERATE	10 LOW	19 LOW	43 Category III
Wetland E	1,145 ft ²	Yes	Very High	Likely	10 LOW	12 LOW	19 LOW	41 Category III
Wetland F	228 ft ²	Yes	Very High	Definite	2 VERY LOW	6 LOW	15 VERY LOW	23 Category IV

In addition to being smaller than 2,500 square feet in size, the water quality, hydrologic and habitat scores for each wetland were low to very low. These low values were based upon their low potential to improve water quality or hydrologic function due to their isolation, small size and volume of stormwater runoff received from the surrounding area. Also, the wetlands do not have the opportunity to reduce flooding or erosion to downstream sources because of their isolation and shallow natural storage depth.

The critical area report also indicated that the wetlands do provide good to fair cover for song birds and small mammals; but overall, the habitat values scored low for the wetlands due to a monoculture of vegetation and because standing water is infiltrated too rapidly to support amphibians. The disturbed nature of the wetland and buffer resulting from historic timber harvesting also limits the quality of the habitat.

Wetland and buffer mitigation techniques identified in the City's Wetland Ordinance, include the restoration, creation and/or enhancement of impacted wetlands and associated buffers. In respect to wetland creation or relocation, a mitigation plan is developed that provides for land acquisition, construction, maintenance and monitoring of replacement wetlands. The intent of the new wetland is to re-create as nearly as possible, the original wetlands in terms of size, function, geographic location and value. The goal of any compensatory project is no net loss of wetlands.

LMC 14.28 identifies that if the preliminary review indicates the values and functions of small size wetlands, Category II and III wetlands less than 2,500 square feet or Category IV wetlands less than 10,000 square feet, are sufficiently limited considering other goals and policies of the Comprehensive Land Use Plan to develop an urban community, the small wetland may be exempted from full wetland permit review.

Based upon the analysis prepared by EnCo, all six wetlands provide low to very-low water quality, hydrologic and habitat function and are considered exempt from full wetland review. Based on the relatively low functions provided by the wetlands they are good candidates for either reduction in buffer width (if project plans incorporate restoration and enhancement of the systems) or to be filled if there is a compensatory plan to develop a constructed wetland in a location onsite with suitable hydrology. Any buffer reduction, averaging or compensatory plans will require conformance with provisions contained in the City of Lacey's Wetland Ordinance and will require mitigation to be provided by the applicant.

Fish
No lakes, ponds, streams or rivers stocked with game fish as defined by RCW 77.08.020 by WDFW or which support priority fish species are located on the site. Fish populations were not observed in any water, drainage way, or wetland on the site.

Animals
No priority or sensitive species were observed or reported on the site and are not depicted on WDFW reviewing maps.

Priority Habitat Areas
The City of Lacey has mapped important species and habitat areas. There are no such areas located within the Lacey Gateway. The tree inventory completed for the project did not identify any historic or specimen trees located on the site. The WDFW Priority Habits and Species map identified "oak stands" on the site, however, the Preliminary Tree Protection Plan prepared by Washington Forestry Consultants concluded that the oak stands did not exceed 7 percent of the site or one acre in size. For these reasons the oak stands on the site are not a priority habitat.

The WDNR Natural Heritage Program database search on and within approximately 330 feet of the site did not identify any rare, sensitive, priority plants or high quality native ecosystems.

Impacts
Clearing and grading for construction of roads and other infrastructure will result in removal of trees and vegetation. Phase 1 grading will impact existing trees and will clear all vegetation except the central greenway and perimeter greenbelts. The grading plan for Phase 1 shows substantial grading within the area of the four wetlands as a result of creating a viable urban town center. As a result, these wetlands will be filled. Loss of terrestrial habitat for song birds, deer and other transient wildlife populations will occur with development, but the impact is not greater than what is anticipated with the City's Comprehensive Plan.

Build-out
As a result of grading the site to create the extension of the town center and meet the objectives of the regional drainage plan, the two wetlands within the future build-out will be filled.

Mitigation Measures

Phase 1

The following mitigation measures all apply to Phase 1 of Lacey Gateway:

1. Prior to any filling or grading activity within exempt wetlands the applicant shall provide a compensatory wetland replacement plan in compliance with City Regulations.

2. A minimum of 5% or 11.5 acres will be set aside as tree tract(s). The tree tract (s) will be developed

within the entirety of Phase 1 or proportionally as future phases are developed. Tree tract(s) will meet the requirements of LMC 14.32.

3. A tree and vegetation protection and landscape greenbelt at a minimum width of 40 feet will be provided between I-5 and the frontage road, and 50 feet between Britton Parkway and interior streets and other improvements. This greenway will be planted where gaps occur, thinned where trees are too dense and view corridors created where necessary to provide visibility to the project. The greenway will vary in width, but will be no less than 40 feet meandering.
4. Existing trees within the Central greenway will be retained and protected from development activities to achieve a mature park-like setting. A landscape plan will be provided to the City for greenway areas identifying native and ornamental plantings that will supplement the understory and add tree density where needed.
5. An annual hazard tree evaluation will be conducted to determine short and long-term effects of site changes on protected trees. The annual evaluation will occur for five years following completion of construction activities that occur within 100 feet of any protected trees.
6. In addition to the above mitigation measures, the City will apply its adopted development regulations pertaining to wetland, tree, vegetation, and habitat conservation protection to mitigate impacts associated with development occurring adjacent to wetlands and tree and vegetation removal.

Build-out

The following mitigation measures apply to full build-out only of Lacey Gateway.

1. To maximize the value of the compensatory wetland replacement proposed, all compensatory wetlands should be consolidated into one large constructed wetland and sized accordingly. Creating one large compensatory wetland will increase viability, and improve both function and value of the wetland.
2. To limit future disturbance to the combined compensatory wetland shall be considered and constructed during Phase I.
3. The City will apply its development regulations pertaining to wetland, tree, vegetation, and habitat conservation protection.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts to fish, wildlife, or threatened or endangered species are anticipated from the project.

3.2.5 Cultural Resources

This section addresses the potential of occurrence of cultural and archaeological resources on the Lacey Gateway site and assesses potential impacts to these resources. This section is based on information contained in a Cultural Resource Assessment prepared by Historical Research Associates, Inc. (HRA). The assessment was performed using both archival review and field reconnaissance and is provided in Appendix G.

Existing Conditions

Construction activities that could affect subsurface archaeological deposits include clearing and grading and excavation for building foundations and utilities. A Cultural Resource Assessment prepared by HRA in August, 2006, determined that the project area has a low to moderate probability for significant prehistoric and historic archaeological resources. The State Department of Archaeology and Historic Preservation concurred that the project will have no impact to cultural resources. The Nisqually Tribe, Squaxin Island Tribe and Confederated Tribes of Chehalis were contacted regarding traditional cultural activities or cultural heritage value near the proposed project and invited to provide input if they had information, comments or concerns. No comments were received.

According to the HRA report, the project area lies partially within an area historically known as Tyrrell Prairie (United States Surveyor General 1854, 1894), currently known as Hawks Prairie. The project area would have been available to prehistoric people approximately 14,000 years ago. Aboriginal peoples periodically burned the prairies to keep them free of trees and underbrush and ancestors of the Nisqually and Squaxin Island Tribes likely used prairies in the project area to gather plants and berries and to hunt and trap land mammals. Most seasonal use camps would have been on prairie margins with access to fresh water, none of which occur on the project site. After horses were introduced to the Sahehwamish and Nisqually peoples in the 1790s, horse racing was a favorite pastime, and contests were held on natural prairies.

The first non-native settler in the project area was Tyrus Himes, who farmed his land between 1853 and 1879. William Pix purchased land in the area in the 1860s as a real estate investment and later managed the land for timber. His family did not live on the land, and no logging camps or early homesteads were present in the project area.

The areas with the highest probability for seasonal camps would have been within pre-1854 prairie margins that extended further west and along the floodplains of Woodland Creek outside the boundaries of the project area. Additionally, the majority of the project area has been disturbed by gravel quarrying and processing or managed for timber.

HRA first conducted a pedestrian survey of a 25-acre tract in the southwestern portion of the project area to determine if there were areas with a high probability for significant archaeological resources. Field reconnaissance confirmed that most of the 25 acres had been disturbed by quarrying, historical logging and recent recreational use. Archaeologists then conducted a field reconnaissance of the remaining 229 acres, focusing on a pedestrian survey to ascertain if there were any portions of the project area that had not been disturbed. No cultural resources that may be eligible for listing in the National Register of Historic Places (NRHP) and Washington Historic Register (WHR) were identified. Cultural resources identified in the project area were modern debris consisting of household refuse, electronic parts, vehicle frames and furniture.

Impacts

Construction activities that could potentially affect subsurface archaeological deposits include clearing and grubbing, grading, and excavation for building foundations and utilities. Since there are no known historic period archaeological resources or cultural use areas eligible for listing in the NRHP or WHR on the site, no impact on these resources is expected. However, there is potential for unknown and undiscovered archaeological resources to be discovered during construction. This is not expected, however, due to the light use of the site by native peoples and previous activities that likely disturbed any resources that may have been on the site.

Mitigation Measures

The probability of significant prehistoric and historic archaeological resources in the project area is low to moderate. Based on the results of archival research and field reconnaissance, construction activities will not be required to be monitored.

Phase 1 and Build-out

In the unlikely event that a known archaeological resource is discovered during construction site earthwork the following steps shall be taken:

1. All activity in the immediate vicinity of the find will cease pending notification of the Nisqually Indian Tribe, the Squaxin Island Indian Tribe, and the State Historic Preservation Officer (SHPO).
2. Consultation with SHPO will take place and if necessary a qualified archaeologist will be retained to assess the significance of the find.

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3.3 Built Environment

3.3.1. Land Use

Lacey Gateway Town Center Planned Action Site

The Lacey Gateway project consists of approximately 250 acres of land located north of I-5 and south of Britton Parkway. The site is vacant with the exception of a Cabela's retail store in the southwestern portion of the property that opened in November, 2007. Concurrent with Cabela's opening, Gateway Boulevard was completed with a roundabout intersection at Britton Parkway. Portions of Main Street fronting the Cabela's site have also been constructed, with future plans to extend this street through the site to connect to Marvin Road to the east. (See Figure 3-7.)

Phase 1 of the proposed Lacey Gateway Town Center is the subject of this specific review consisting of a Site Plan Review/Master Plan, SEIS, development agreement and planned action process. Phase 1 is envisioned as an intensely developed mixed-use town center retail and commercial area. Up to 500 residential units are anticipated in Phase 1, integrated with the commercial area. A majority of the units will be located in buildings with ground floor retail, office and/or parking garage space. A percentage of the units are proposed to be located in buildings with residential units located on the ground floor.

Phase 1 will have both box retailers and more compact urban form with an interconnected street network and buildings filling large portions of each block. In addition to the core retail area, building pads, designed to support restaurants, hotels, box retail, and other retail uses will be located around the periphery of Phase 1. (See Figure 3-9)

Future Phases will infill within Phase 1 and extend the development westerly across the site. Both urban form retail and large multi-story residential areas are proposed within the future phases of the project.

Phase 1 of the Gateway Center has been planned to a level of detail allowing a planned action (project) level review. Sufficient detail is known about the proposed development types, general locations, and potential impacts to allow a project level review. The details of the development pattern, land use mixture and timing within the future phases in the build-out area are not as well known today. This is due to the uncertain nature of market forces, timing and the dynamics of a Master Plan the magnitude of the Lacey Gateway Town Center will build-out over time. Future development outside the area defined as Phase 1 will therefore undergo separate land use and environmental review at the time actual development is proposed.

While there is sufficient planning and detail in the proposal for Phase 1 constituting the Lacey Gateway Planned Action, it is again important to note the dynamic nature of the Master Plan. The location of buildings, building heights, mix of land uses, streets, etc., that are shown on the site plan are conceptual and are not intended to be site-specific or exact. Boundaries, heights, alignment and relative mixes of uses could vary somewhat within the limits analyzed in the SEIS and identified in the Planned Action Ordinance. The SEIS therefore may be viewed as establishing maximum limits for elements such as square footage, density, types of uses, utility demand and vehicular trips generated with fixed connection points to the adjacent public rights-of-way and utilities. Within these limits, specific internal road alignments, utility infrastructure, development mix, and building height and bulk for specific buildings could vary from what is shown on the Master Plan.

Surrounding Land Use Context

The area surrounding the Gateway Center is diverse, ranging from large undeveloped areas to the north to a dense commercial center to the south. Property located north of the project area is characterized by large tracts of undeveloped forested land and scattered industrial sites. The planned communities of Meridian Campus and Hawks Prairie are located to the northeast of the site. These areas contain a variety of housing

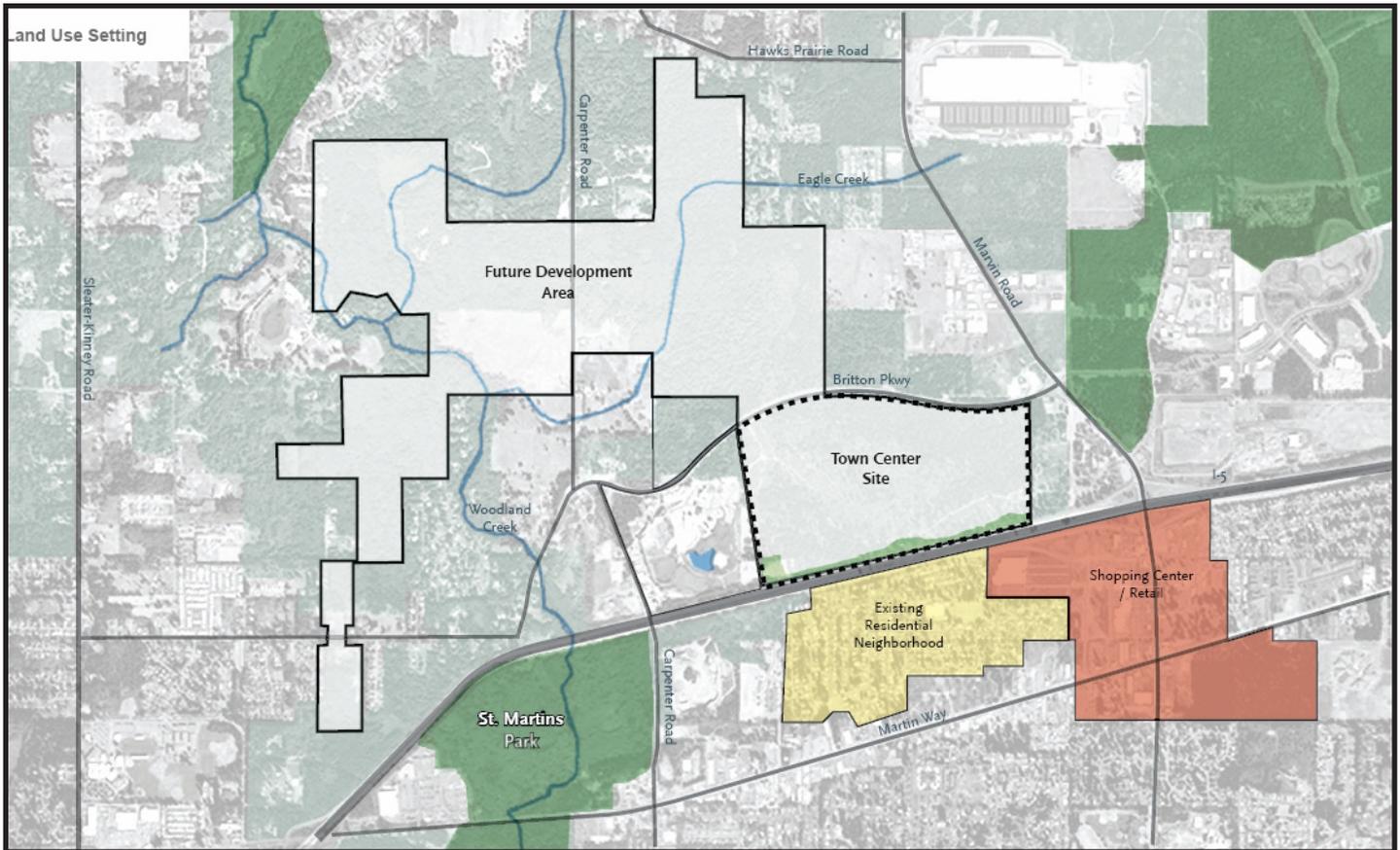


Figure 3.7 - Surrounding land use context

types, office parks, light industrial facilities and two 18 hole golf courses.

Miles Sand & Gravel operates a mine immediately west of the property. The property is approximately 88 acres in size. Several undeveloped parcels, zoned Hawks Prairie Business District-Commercial, are located between the eastern property line of the Gateway property and Marvin Road. Further east is the Thurston County Waste and Recovery Center which includes a garbage transfer station, recycling and composting center and household hazardous waste drop off facility.

The project area is bounded by Interstate 5 to the south. On the south side of Interstate 5 in the vicinity of the proposal is an emerging commercial center and older residential area. The commercial area consisting of over a million square feet of floor space includes a large strip mall complex, several restaurants, fast food establishments, a Super Wal-Mart, several banks and independent retailers, and a new Home Depot/Costco complex. The residential areas are primarily composed of single family homes constructed in the 1960s and 1970s.

Population Housing & Employment – Existing

Currently, the only development on the site is the new Cabela’s store, which opened in November of 2007. The store is directly employing 233 people and potentially created between 377 and 438 additional indirect jobs in the area. Indirect jobs are those that are created as a result of the demand for goods and services by the employees in an area. (*Lacey Cabela’s Economic Impact Analysis, March, 2006*)

There is no housing currently located in the proposed development site. However, the site is located in the Hawks Prairie Planning Area which had a population of 2,460 in the 2000 census. Population projections for the Hawks Prairie Planning Area contained within the Land Use Element of the Comprehensive Plan estimate the population will be 13,760 people by 2025. The 2003 Lacey Comprehensive Plan estimates that housing in the Hawks Prairie Planning Area will be comprised of 4,290 single family homes, 1050 multi-family homes, and 140 manufactured homes in 2025.

Currently there are 4,988 residential units committed in the Hawks Prairie Planning Area – 3,822 single family units, 1,046 multi-family units, and 120 units of manufactured housing. This number includes both built and un-built units, units inside the corporate city limits and those located in the urban growth area. The Hawks Prairie and Meridian Campus master planned communities both account for a large number of the un-built but committed units in the HPPA. Of the incorporated land within the HPPA, only three residentially zoned parcels, a total of 42.68 acres, remain for which applications for development have not been made.

As of this writing, there are a limited number of land parcels left in Lacey’s city limits suitable for long plat residential subdivision. Meeting the City’s future demand for residential growth will require increasing densities and integrating residential units with retail and commercial projects.

Currently, there is no residential development located on the Lacey Gateway Town Center site. The Lacey Gateway Project proposes both higher densities and mixed-use buildings. At full build-out, it is proposed that the site will house 2,500 residential units; however, the Planned Action for Phase One will contain only 500 units.

City of Lacey Comprehensive Plan Land Use Designations

The City of Lacey Comprehensive Plan divides the City into eight planning areas. The proposed Lacey Gateway Town Center is located in the Hawks Prairie Planning Area of the City. In a discussion regarding population within the Land Use Element of the Comprehensive Plan, the Plan states: “Increasing density over existing zoning designations or actions encouraging higher density in this planning area could extend the vacant land resources and increase long term potential density and population.” (*Lacey Land Use Plan for the Urban Growth Area, 2003, p 9-2*)

In terms of site-specific designations, the Comprehensive Plan Land Use Map designates the majority of the Gateway site as “Hawks Prairie Business District – Business/Commercial” and a small strip approximately 30 acres in size along the eastern property line as “Hawks Prairie Business District – Commercial”. The Comprehensive Plan identifies the Hawks Prairie planning area as one of the City’s most opportune areas for new development due to the availability of vacant land and prime location adjacent to the Interstate 5 corridor. The Comprehensive Plan identifies the vision established in the City’s Northeast Area Plan, 1992 as the guiding force for the area. The goals and policies adopted in the Northeast Area Plan were adopted by reference in the Comprehensive Plan.

City of Lacey Northeast Area Plan

In 1992, the City adopted a special plan for the Northeast Planning Area. This Plan established the “Hawks Prairie District” that was envisioned to support residential, regional/commercial business, mixed-use retail, bank, office and corporate facilities. The district was established to provide a dense mixed-use node that would provide an opportunity to create an urban area with “jobs, commercial facilities, residences and recreational activities close together.” The Hawks Prairie District was located between Hogum Bay Road on the east and Carpenter Road on the West, south of the new Britton Parkway. The Lacey Gateway property in its entirety makes up a substantial portion of the area zoned Hawks Prairie District in the Plan.

The Northeast Area Plan/Hawks Prairie District allows for residential development at 20 units per acre (maximum and minimum), limited to 10 percent of the zone. It also listed a number of permitted commercial uses such as medical facilities, hotels, motels and conference centers, retail/commercial, financial institutions, mass transit, offices, corporate headquarters, and cultural, entertainment and recreation facilities. The Plan also emphasized the importance of creating an open space network with a variety of recreational facilities. It established that the open space network should be connected and include trail systems that connect to other portions of the City.

City of Lacey Economic Development Element

The Economic Development Element of the Lacey Comprehensive Plan provides direction for Lacey's future economic growth. Economic growth is affected significantly by other elements of the Comprehensive Plan and interconnects closely with environmental issues that affect land use decisions and balancing different types of land uses. It offers policy recommendations for sustained future economic growth and strategies to implement those policies. Goals include:

- To foster efforts which stimulate economic development through expansions of employment opportunities, tax base, and export-producing entrepreneurs.
- To enhance Lacey's image as a good place to live, work and play:
 - Continue development of Lacey's civic center concept.
 - Explore opportunities for convention housing and development of proper facilities for such.
 - Provide and promote attractive, functional, and efficient commercial areas and business centers.
 - Dynamize retail centers by encouraging events which combine product promotion with cultural and recreational activities.
- To encourage diversification in order to create a vibrant, dynamic economic base to serve the needs of the community.
- To foster new business locations in Lacey which are environmentally acceptable.
- To establish clear goals about the desired future locations and patterns of economic development.

**City of Lacey Zoning
Gateway Project Area**

The majority of the project area is zoned Hawks Prairie Business District – Business Commercial. The remainder is zoned Hawks Prairie Business District – Commercial.

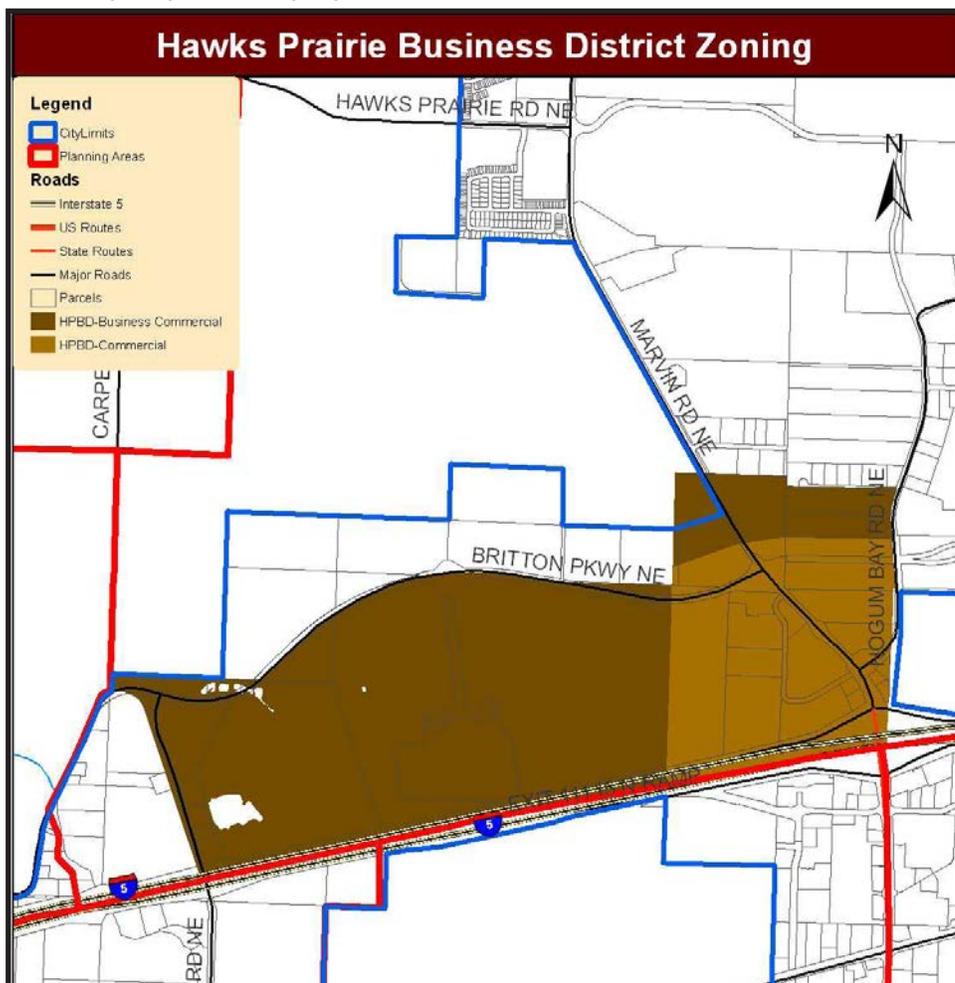


Figure 3.8 - Hawks Prairie Business District zoning designations

The remainder is zoned Hawks Prairie Business District – Commercial. The primary difference between the two designations is that the Commercial area is focused on preserving land area for retail-commercial uses while the Business/Commercial area allows a more mixed-use development pattern including all the uses permitted in the designated commercial area, plus residential uses when located in mixed-use buildings. Other allowed uses include public services, mass transit, office and manufacturing. Both the Commercial and Business/Commercial portions of the Hawks Prairie zone are intended to encourage integrated and well planned developments where people will want to live and work. This is encouraged through allowing residential and compatible business uses to develop in close proximity with strong aesthetic links and through the implementation of strict performance standards.

The Hawks Prairie Business District zoning also encourages original and innovative site planning, architecture, landscaping and design. Mass transit and development patterns that support alternatives to the single occupancy vehicle are encouraged. Several conceptual site plans are adopted as part of the zone to provide guidance in fulfilling the intent and provisions of the Hawks Prairie Business District.

In order to preserve the Hawks Prairie Business District for the types of development desired in the area, a number of land uses are prohibited. These generally include uses with physical and operational requirements considered inconsistent with the mixed-use vision of the zone. These include uses with significant truck traffic, dust, noise or odors associated with their activity. Other prohibited uses include activities that require significant outdoor storage, machine shops, auto or truck storage, solid waste facilities and warehousing.

Parks & Open Space

The Northeast Area Plan established an open space overlay over the entire plan area. The overlay is intended to facilitate a connected and comprehensive open space network and a range of recreational opportunities in the area.

Currently there are two 18 hole golf courses within the planning area – one in the Meridian Campus Planned Community, and the other in the Hawks Prairie Planned Community.

The area also has two parks – a 5-acre neighborhood park and a 24-acre community park. Both of these facilities are located in the Meridian Campus Planned Community to the northeast of the Gateway project area.

Proposed Land Use

The development plan for Lacey Gateway project is to construct a mixed-use town center project in a manner consistent with the City of Lacey Comprehensive Plan. As discussed above, the Land Use Element of the Comprehensive Plan designates the subject property for mixed-use development.

Phase 1 of the proposed development consists of approximately 120 acres of land, located primarily within the easterly portion of the site. Phase 1 development will provide the core of the mixed-use town center. This phase, as proposed, will consist of 1,100,000 square feet of retail space¹, 100,000 square feet of office space, and 500 units of housing. It is also anticipated that a portion of Phase 1 will be reserved for civic use, to meet the community needs.

Retail-Commercial, Offices, and Hospitality

While a significant amount of stand-alone retail is necessary for the project to succeed, the primary focus of the “town center” portion of Phase 1 will be retail blocks centered around a public plaza, with offices and/or housing located on upper floors. Streets within the development are designed to enhance a “pedestrian-friendly” environment with on-street parking, attractive sidewalks, and storefronts built to the front of the property to define the public space and create an urban downtown-like streetscape.

Phase 1 offices are primarily intended to contribute to the mix of uses within the town center, and will include professional and medical offices. Later phases will allow for the creation of an “office park” area along Britton Parkway, where opportunities for larger corporate offices will be created.

As many as two hotels may be constructed in Phase 1 of the development. In addition to the pent-up demand in the local market for hotel rooms, the type of consumer attracted to Cabela’s from a wide geographical region, indicates that this type of use will be in high demand. Also, the construction of office space within the development is anticipated to create a need for hospitality uses that will cater to the business traveler.

¹ For this document, the definition of “retail” includes hotels, restaurants, and entertainment venues.

As a result, this hotel type may also include conference rooms and other meeting space.

The anticipated types of retail/commercial uses proposed for the development include but are not limited to



Figure 3.9 - Lacey Gateway Town Center Phase 1 conceptual site plan

the following:

- Grocery/specialty foods
- Pharmacy
- Personal services
- Personal care and fitness
- Clothing stores
- Shoe stores
- Jewelry stores
- Home furnishings
- Home electronics
- Home improvement/gardening
- Books and media
- Sporting goods
- Toys and hobbies
- Miscellaneous specialty
- General merchandise stores
- Warehouse club - (i.e. large retail store)
- Department stores
- Full service restaurants
- Limited service restaurants
- Family entertainment
- Bars and nightclubs
- Hospitality
- Professional offices
- Medical offices

Civic Uses

The applicant has worked closely with the City of Lacey to provide opportunities within the development for civic uses. Up to ten acres of land could be developed within the Lacey Gateway Planned Action site for the purpose of locating community facilities that enhance and complement a town center environment. Examples of such uses may include the construction of a library branch, activity center, performing arts

center, farmers market, public park, or cultural center. A key civic use planned for the site is the Market Square Pavilion, an area set aside for possible use as a market area for local farmers and craftsman.

Open Space

A variety of open spaces are identified in the Lacey Gateway Town Center Master Plan. The Central Greenway is approximately 6.5 acres of greenbelt that runs east-west through the site. This open space area is intended to provide walking and cycling trails through the site, with a possibility of connecting with regional open space areas such as the Nisqually Delta and the Chehalis-Western Trail in the future. The greenbelt was designed to be consistent with the vision of an interconnected linear open space network established in the Northeast Area Plan. A multi-use public plaza will provide opportunities for public gatherings. Several smaller courtyards and plazas are planned to provide smaller public spaces for people to enjoy while visiting the Gateway Center.

Impacts - Development Intensity/Density

The Gateway Center project represents an intensified development pattern consistent with what was envisioned in the Northeast Area Plan and Land Use Element of the Lacey Comprehensive Plan. The development intensity and density proposed in the Master Plan as compared to that anticipated in the Lacey Comprehensive Plan is discussed further below.

Phase 1

Phase 1 development will provide the core of the mixed-use town center. This phase will consist of 1,100,000 square feet of retail space², 100,000 square feet of office space, and 500 units of housing. It is also anticipated that a portion of Phase 1 will be reserved for civic use.

Table 3-6 - Proposed Development Within Phase 1

Use	Phase 1	Units
Residential Units	500	Dwellings
Retail	939,000	Square feet
Office	100,000	Square feet
Hotel	87,000/270	Square Feet/rooms
Cinema	44,000	Square feet
Civic use	30,000	Square feet

Each development type proposed within Phase 1, and its relationship to previously planned development intensity, is described further below:

Retail/Office

Previous planning efforts affecting the proposed project site envisioned a mixed-use area with retail, offices, and business park developments throughout much of the site. Environmental analysis done in association with those planning efforts did not specify the number of square feet or employees anticipated to be located within the area. However, traffic analysis conducted in support of the City’s Comprehensive Plan anticipated employment within the two Traffic Analysis Zones (TAZ 249 & 338) located within the project site. According to the previous traffic analysis for the area, it was anticipated that there would be 2,790 employees within TAZs 249 and 338.

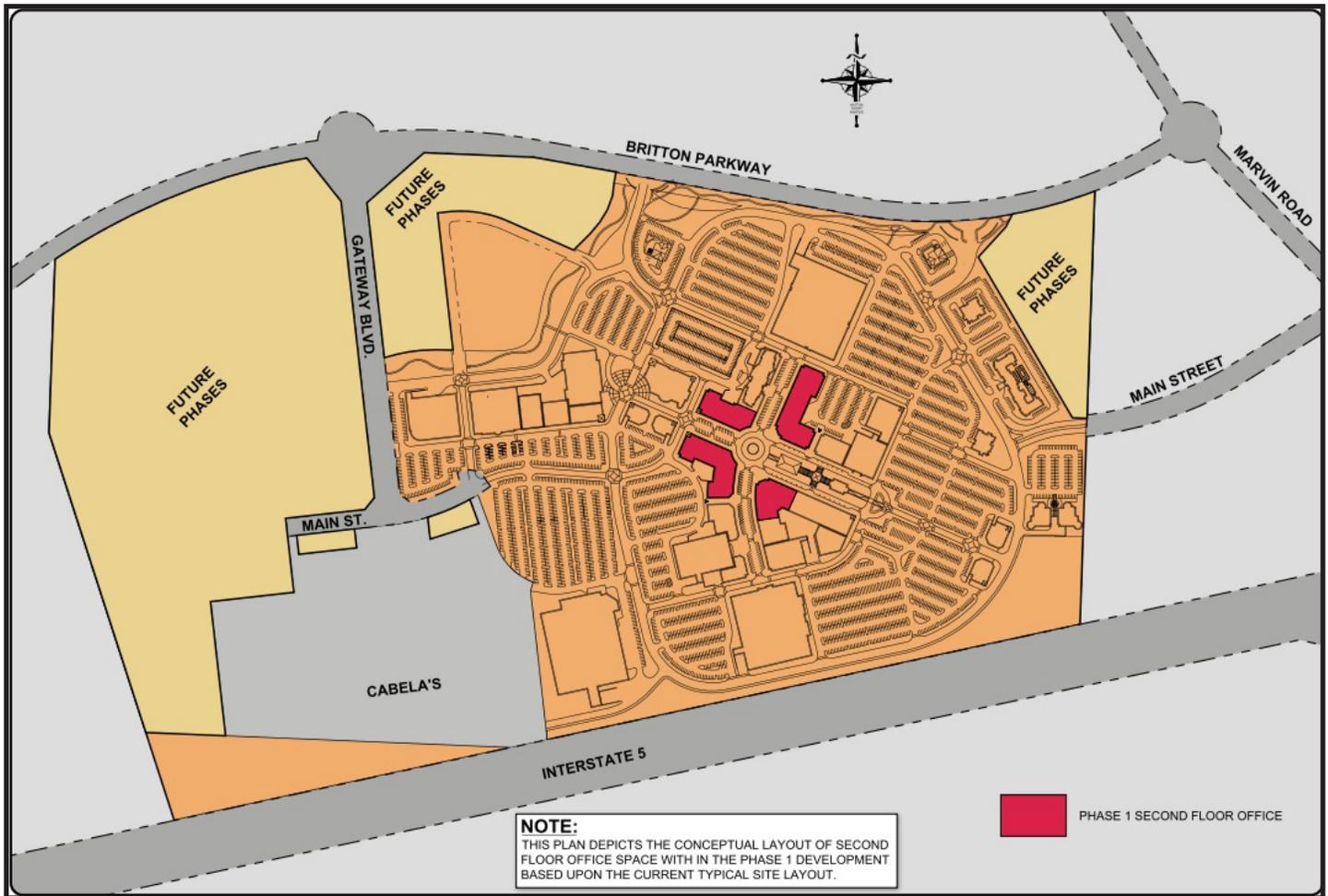


Figure 3.10 - Lacey Gateway Town Center Phase 1 above ground floor office uses conceptual plan

Table 3-7. 2030 Estimated Employment from Previous Analysis Efforts

Use	Employees in TAZ 249	Employees in TAZ 338	Total
Retail	40	200	240
Government	84	0	84
Service	1,141	1002	2,143
Other Sectors	171	152	323
Total	1,436	1,354	2,790

Employment estimates for the build-out of Phase 1 of the Gateway project anticipate 2,622 jobs within Phase 1. Projected jobs by land use type are shown in Table 3-8 below.

Table 3-8 - Phase 1 Estimated Employment

Use	Phase 1	Unit	Employees per Unit*	# Employees
Retail – Shopping Center	939	1,000 square feet	2	1,878
General Office	100	1,000 square feet	4	400
Civic Uses	30	1,000 square feet	1	30
Cinema	44	1,000 square feet	1	44
Hotel	270	Rooms	1	270
Total Employment				2,622
Cabela's	233			2,855

*Source: TRPC

Overall, Phase 1 of the Gateway Center, including the new Cabela's store, is anticipated to have 65 more employees than what was estimated for the entire project area in the TRPC model update for the Lacey area. Therefore, the anticipated employment density in Phase 1 is consistent with the projected employment figures identified in the Comprehensive Plan and the associated environmental impact statement.

Parking

In addition, a total of 6,430 parking spaces are proposed to serve the land use needs for Phase 1. This is within the minimum and maximum range of spaces recommended by the City's parking standards enumerated by LMC 16.72. City of Lacey parking space requirements (LMC 16.72) for the Phase 1 proposed land uses are shown in the following table.

Table 3-9 - City of Lacey Parking Requirements

Land Use	Unit Measure	Minimum # of Spaces	Maximum # of Spaces
Regional Shopping Center	1,000 sf GFA	3	6
Retail in mixed-use development	1,000 gross sf	2	4
Multi-family structures	Dwelling unit	1.5	
Office (with onsite customer service)/Medical Office	1,000 GFA	2	4
Hotel	Room	1	2
Civic Area (used library rate)	200 sf GFA	0.5	1
Cinema	4 seats of Assembly Area	1	1.5

The City's requirements for parking for Phase 1 uses are shown below.

Table 3-10 - Parking Requirements for Phase 1

Land Use	Size	Minimum # of Spaces	Maximum # of Spaces
Retail (Regional Shopping Center Rate)	939,000 sf	2,817	5,634
Multi-family	500	750	750
Office	100,000	200	400
Civic	30,000	75	150
Hotel	270 rooms	270	540
Cinema	1,600 seats	400	600
Total		4,512	8,074
<u>Proposed Phase 1 Parking Spaces</u>			6,430

Residential

The developer anticipates housing within Phase 1. It could be comprised of both ground floor condos and housing units located above retail space in the mixed-use core. The housing units are anticipated to be constructed as apartments that would potentially be converted to condominiums in the future. All of the housing is proposed to be market rate.

Current zoning restricts residential development to upper floor units and by density applied to no more than 10% of each development site within the Hawks Prairie Business District – Business/Commercial area. The 30 acres of the project site within the Hawks Prairie Business District – Commercial area along the eastern portion of the project is not allowed to contain residential units under current zoning. However, the Master Plan submitted for the project applies to a single ownership of 250 acres that is being planned and developed as one coordinated with both a strong retail/office and residential component. Because of this, the City has determined that it is appropriate to allow the entire project area to be used in calculating the number of allowed residential units, up to 20 units per acre calculated on 10% of the site. The 250 acres within the Lacey Gateway project therefore allows for 500 multi-family residential units in mixed-use buildings.

The intent of restricting residential units to upper floors is tied to preserving the ground floor foot prints for commercial, office, retail, or parking uses. Preventing the residential market from potentially dominating an area the City has recognized as having a strong influence on the City of Lacey’s economic future. The restriction to upper floors is also tied to creating a multi-story streetscape with street level activity promoting an integrated/mix use planned community where people want to live and work.

The multi-family units proposed in the Gateway Center are expected to attract young urban professionals “empty nesters” and retired seniors, among others. Although the typical number of persons per household in the City of Lacey is 2.5, the residential development proposed in Lacey Gateway is unique. Housing in the Gateway project will be more similar to that found in urban areas of larger cities. Multi-family residential units typically have approximately 1.9 persons per unit. (Washington State Office of Financial Management, August 2000). Using this figure, Phase 1 will have approximately 950 residents in the 500 units allowed within Phase 1.

While the potential of developing 500 units within Phase 1 is consistent with the previous land use plans and zoning text, the proposed ground floor units are not consistent with the Hawks Prairie Business District zoning chapter. Since the standard evolved through the development of the zoning text, this standard can be reviewed through the planned action and development agreement process. Provided it can be demonstrated that the original tenet of preserving land for adequate economic development for the City to utilize in providing services, and the sense of place and scale are achieved, this proposal will be considered.

Civic

Phase 1 of the Lacey Gateway Town Center Master Plan establishes an area for future civic uses including such potential facilities as a future library, city hall annex, or performing arts center. As discussed above and reflected in Table 6, previous analysis associated with the City of Lacey Comprehensive Plan anticipated approximately 84 government-related jobs in the Gateway area. The level of civic uses anticipated in the Master Plan would likely result in a slightly higher government job production if all of the types of civic uses proposed are constructed. However, overall, the level of civic uses proposed in the Master Plan is consistent with what was envisioned in previous land use plans and associated environmental documents.



Figure 3.11 - Conceptual open space plan

Open Space

Phase 1 of the Master Plan will contain a number of open space areas intended to serve a variety of recreation and green space needs of the people who will work, shop and live in the area. Described in the Master Plan, the concept of the planned plazas and green spaces are further discussed below. In addition to the primary plaza and open spaces described below, opportunities will occur as blocks are developed, to design small pocket spaces for outdoor café seating, fountains, benches, tree preservation, etc., that further enhance the look and feel of the visualized urban environment.

Town Square Plaza: This open space concept is a centrally located multi-use plaza that is intended to serve as the hub of the Lacey Gateway Center. The plaza can be designed in a manner that allows adjoining street(s) to be closed off to accommodate larger celebrations and festivals. On a daily basis, it will provide a place for individuals, families and groups to meet and spend time outdoors. At times, the square will be a quiet place, and at other times, it will be active due to community celebrations or performances.

Civic Plaza: The plaza will be located in a manner that will provide a connection between civic buildings and the activities and uses that occur within them. This multi-use plaza area can host a variety of both formal and informal activities, opportunities for programmed and non-programmed gathering, and a space for community outdoor events.

Entertainment Plaza: This multi-use plaza is intended to be sized and designed in a manner that reflects the district surrounding the space. This type of open space can be utilized in multiple locations to provide outdoor space for formal and informal gathering activities adjacent to restaurant clusters and to help define the entrance to entertainment uses such as cinemas.

Central Greenway: Phase 1 will contain the eastern portion of the Central Greenway. This open space is intended to provide passive open space with Class 1 trails and natural open spaces in a mature park setting incorporating existing trees and landscaped with native and ornamental understory and ground cover. The greenway will have opportunities for both active and passive recreation and will provide a habitat area for local wildlife. Its location will also allow for it to naturally filter noise and dust associated with the surrounding development.

Britton Parkway Greenbelt: Phase 1 contains the eastern portion of the Britton Parkway Greenbelt. This area will be a minimum of 50 feet wide and is intended to maintain the iconic tree lined parkway feel of Britton Parkway. It will contain native trees retained and integrated with the development and landscaped with native and ornamental understory and ground covers.

Interstate-5 Greenbelt: These greenbelts are intended to provide an area of varied width, with no portion less than 40 feet wide, of undisturbed native trees that will be preserved and integrated with development activities. It will also include several of the constructed wetlands and infiltration galleries associated with the regional stormwater facilities needed to serve the Lacey Gateway Town Center project. The greenbelt will preserve the current tree lined Interstate 5 corridor and create filtered views from Interstate 5 into the development. It will naturally filter noise and dust associated with the adjacent freeway.

Overall, Phase 1 will contain a number of public plazas and 13.5 acres of greenbelt and greenway, roughly 11 percent of the land area of Phase 1. Based on policies for open space and recreation established in the City's Comprehensive Plan, Section 16.37.110 of the Lacey Municipal Code establishes that a minimum of ten percent of the total site acreage be used for common open space purposes. Section 14.23.088 of the Lacey Municipal Code also provides guidance on acceptable types and design of mixed-use/commercial open space. It is the intent that open spaces be designed to be consolidated and contiguous in large commonly dedicated areas wherever possible. The open spaces should be planned for the maximum benefit of the area, preserving and where possible enhancing natural features.

Another goal of the City's Comprehensive Plan is to protect and retain existing native trees within residential and commercial development proposals to preserve the City's natural character. To achieve this, the City established a threshold of 5% (combined with the overall 10% open space standard) of a project site be set aside as tree tracts. These tracts can be scattered in multiple tracts throughout a development, or concentrated to protect a significant grove of trees.

Phase 1 has been designed to meet these requirements. The open spaces described in the Master Plan provide a good mix of both natural and urban spaces that provide connectivity throughout Phase 1 and eventual Master Plan as a whole. As Phase 1 is implemented, the types of open spaces described above, in addition to the pocket spaces, will be implemented in their entirety or in stages concurrent with the applicable development phase. If developed in stages, each development phase should be consistent with the City's Comprehensive Plan and ordinance and contain the minimum amount of open space and tree tract

or show how the tree tract and open space thresholds are being met.

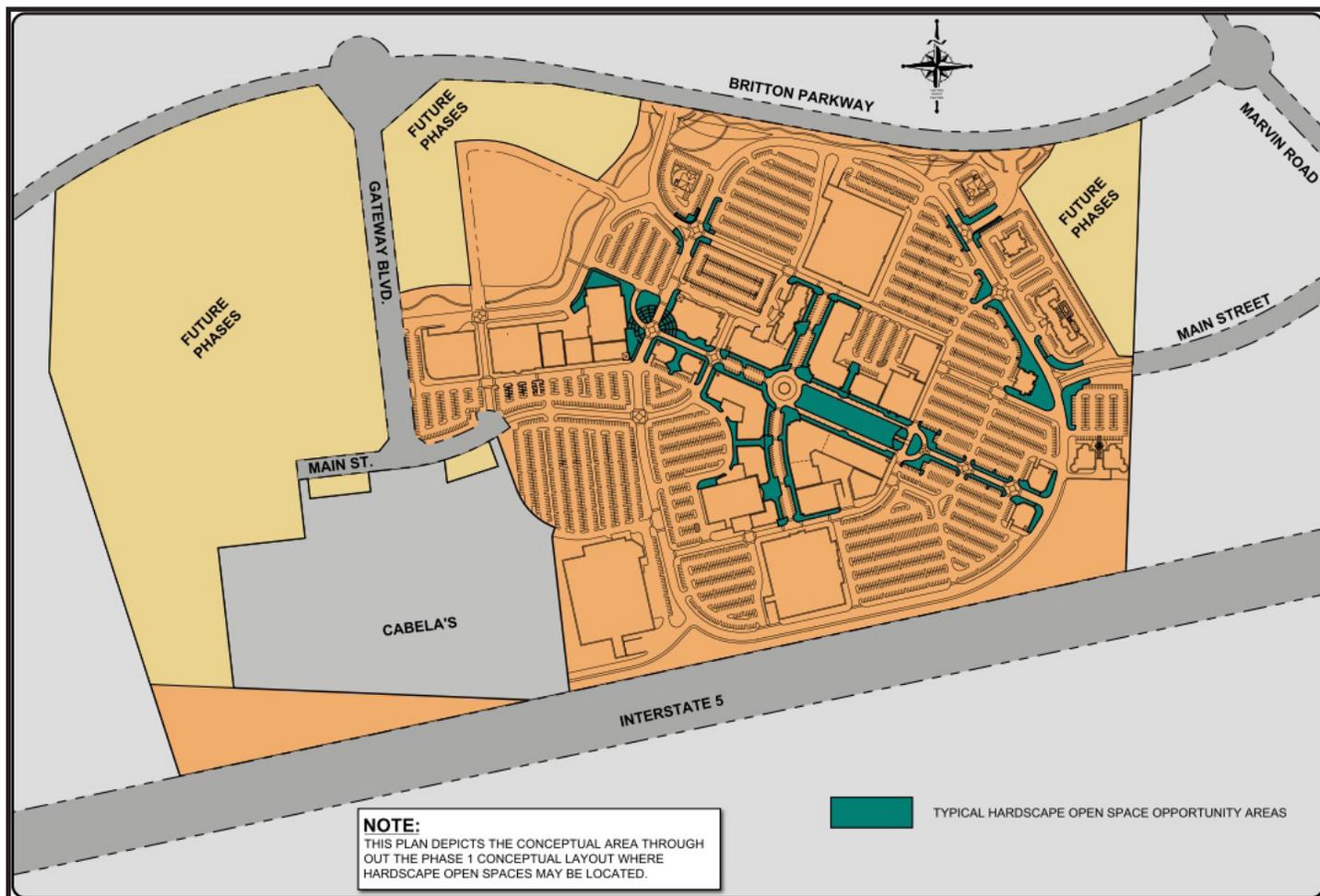


Figure 3.12 - Conceptual hardscape opportunities

Aesthetics

Impacts to visual character associated with development envisioned in the Lacey Gateway Town Center Master Plan relate to the intensity, bulk and scale, visual compatibility, and light and glare generated from the proposed project. The project site is currently vacant and zoned for urban uses and densities. Impacts to visual character, therefore, would result primarily from development of vacant land to urban uses. These impacts are anticipated to occur incrementally.

Visual and aesthetic impacts of the Lacey Gateway Town Center will depend largely on the quality of the architectural and urban design features incorporated into the development; the degree to which the overall scale and form of development incorporates features of the local setting; and the values and preferences of those seeing the change. Magnificent views of Mount Rainier are available at various locations on the project site and have been considered in arranging the proposed layout of the project area. To some residents, the change from an undeveloped site to an urban density and scale commercial area may be perceived as a negative environmental impact. Others may view it as a positive and expected change to land located within the urban growth area which symbolizes growth, prosperity and visual enhancement. Impacts are likely to be considered greatest in areas where the site is most visible from surrounding properties due to topographic features and natural vegetation variations. Depending on the architectural and urban design approaches, however, the change could be considered to be a positive one for the area.

As of this writing, architectural and urban design standards for the proposed project have not been submitted to the City of Lacey. Because aesthetics are critical to the success of the project and the minimization of

impacts to the surrounding area, a comprehensive architectural design plan for the entire site within the Lacey Gateway Town Center will be submitted to and approved by the City concurrent with the development agreement.

Build-out

Implementation of future phases of the Lacey Gateway Town Center is anticipated to be conducted in several phases. It is expected that much of the development that occurs after the completion of Phase 1 will be done in several smaller phases. Because the exact composition and location of those phases is not known at this time, this environmental analysis identifies the future development phases as a build-out scenario.

Future phases will develop the blocks immediately south of Britton Parkway in the northwest portion of the site, the area of Lacey Gateway west and northwest of Cabela’s, and the northern blocks of Eastern Boulevard. The current vision for the site includes retail, residential and office uses. The Master Plan proposes at full build-out a combined 3,080,000 square feet of commercial, office and civic uses mixed with 2,500 residential units utilizing shared footprints and multi-story buildings.

Retail/Office

Build-out of the Lacey Gateway Town Center reflects a substantial increase in retail and office development over what was evaluated in the Lacey Comprehensive Plan. The dense development anticipated is expected to create a new regional retail center and employment hub that will serve the needs of the residents of Lacey and the surrounding area of northern Thurston County and south Pierce County.

In the proposed full build-out scenario, an additional approximately 809,000 square feet of retail, 121,000 square feet of hotel space or 375 rooms and 900,000 square feet of office space could be developed. As illustrated in Table 3-11, this could create over 3 million combined square feet of commercial, retail, hotel and office space in the Master Plan. Based on this, the employment figures could reach potentially 8,215 employees as described in Table 3-12.

Table 3-11 - Retail/Commercial Space Anticipated at Build-out of Project

Use	Phase 1	Future Phases	
		Added	Total
Retail	939,000	809,000	1,748,000
Office	100,000	900,000	1,000,000
Hotel	87, 000 s.f., 270 rooms	121,000 s.f., 375 rooms	208,000 s.f., 645 rooms
Cinema	44,000	0	44,000
Civic area/library	30,000	50,000	80,000

Table 3-12 - Lacey Gateway Anticipated Employment at Build-out

Use	Build-out	Unit	Employees per Unit*	# Employees
Retail – Shopping Center	2,000	1,000 sf	2	4,000
General Office	1,000	1,000 sf	4	4,000
Civic (library)	80	1,000 sf	1	80
Cinema	44	1,000 sf	1	44
Hotel	645	Rooms	1	645
Total Employment				8,769
Cabela's	370			

*Source: TRPC

A total of 17,870 parking spaces are proposed for full build-out of Lacey Gateway Town Center. The type of parking and totals for each phase are shown in the following table. As described in Table 3-13, it is proposed that structured parking facilities will be incorporated into the Master Plan as future phases are developed. In some cases, surface parking will be transitioned into structured parking. This strategy reduces the amount of surface parking area, maximizing the amount of usable land for potential retail, office and residential elements of a highly urban nature and achieving a dynamic envisioned for the town center.

Table 3-13 - Proposed Parking

Parking Type	Future Phases		
	Phase 1	Added	Total
Surface parking spaces	5,843	10,340	16,183
On-street parking spaces	175	300	475
Above-grade structured spaces	412	800	1,212
Total	6,430	11,440	17,870

Source: Hatton Godat Pantier Typical Land-use Layout Exhibit, dated January 2009.

Residential

The Lacey Gateway Town Center Master Plan envisions up to 2,500 multi-family units at build-out. These units are anticipated to be located in mixed-use buildings with residential located over retail/commercial/office space, in single use condominium or apartment structures, and in townhomes located adjacent to the central greenway. Efforts have been made by the developer to prepare a Master Plan that would allow redevelopment of the properties to occur.

The proposed residential component of the Lacey Gateway Town Center reflects a substantial increase in the number of residential units to be located on the property. Previous planning efforts conducted by the City of Lacey in the mid-1990s were based on a more limited residential component to the mixed-use development envisioned for the site

In 1992, the Meridian Campus Planned Community and adjacent Hawks Prairie Planned Community were approved in the Hawks Prairie Planning Area. Both planned communities included significant numbers of new residential units. The Hawks Prairie Planned Community approval allowed a range of residential units between 1,473 and 2,005 (FEIS October 4, 1993) and the Meridian Campus Planned Community was approved for up to 2,600 units (DSEIS April 26, 1991). Current trends indicate that at full build-out, neither the Hawks Prairie Planned Community nor the Meridian Campus Planned Community will contain the number of residential units that these planned communities were originally approved for. It is now expected that at build-out of the Hawks Prairie Planned Community, there will be a total 1,758 housing units, 247 less than approved in the Master Plan. Similarly, the Meridian Campus Planned Community is anticipated to contain 2,085 residential units at build-out or 515 fewer than were originally approved. In addition, the area south of I-5 that the Northeast Area Plan had originally designated as residential was rezoned in the mid-1990s and is now developed with a Wal-Mart and other retail/commercial uses. These 48 acres had a housing potential of 471 units that will not be realized due to the zoning change from residential to commercial and resulting development of the site with a variety of retail and commercial uses. Table 3-14 below summarizes the number of residential units that will not be constructed in the surrounding area:

Table 3-14 - Change in Residential Unit Count on Surrounding Projects

Location	Units Approved or Allowed	Units Anticipated at Build-out	Total Change
Meridian Campus	2,600	2,085	-515
Hawks Prairie P.C.	2,005	1,758	-247
Wal-Mart	471	0	-471
Units Not Realized			-1,233

The units not realized in the residential planned communities and rezoned properties represent units that were anticipated to be built in the immediate area. If these units were to be transferred to the Lacey Gateway Town Center project it would help offset the loss of units from the other projects and mitigate the impact of the number of units proposed in the project. Additional analysis of this issue is needed to determine whether or not this is a viable option.

If the units not constructed in the area were transferred to the project area, including the 500 units proposed in Phase 1, a total of 1,733 residential units could be accommodated on site and be consistent with previous environmental analysis of the impacts of residential development in the area. Under this approach, an analysis of the increased impacts of the addition of 767 units is needed to determine whether or not the total 2,500 units proposed in the Master Plan could be accommodated on site without significant environmental impacts.

If 2,500 residential units as proposed for build-out of the Lacey Gateway project are constructed, and the units had an average occupancy of 1.9 people per unit, the area would have 4,750 residents at build-out.

Open Space

Open space within Future Phases is comprised of the continuation of the Britton Parkway greenbelt, Interstate 5 greenbelt, and central greenway. At build-out, the Master Plan reflects a total of 28.0 acres of open space throughout the site.

Aesthetics

The potential aesthetic impacts of the project are similar between Phase 1 and Build-out.

Mitigation Measures

Phase 1

The following mitigation measures all apply to Phase 1 of the Lacey Gateway.

1. Residential development within Phase 1 of the Lacey Gateway Town Center will not exceed 500 units. Residential units will be integrated into Phase 1 with strong visual and physical connectivity. Residential units will be located in multi-story buildings with ground floor uses consisting of either office, retail, or parking. Subject to approval of the development agreement between the City and the applicant, and depending on final design of Phase 1 there could be the possibility of ground floor units within Phase 1.
2. An open space plan meeting the requirements of LMC 15.12.120 and LMC 16.37.110 will be submitted to the City for review and approval.
3. A greenbelt, 50 feet in width, incorporating and preserving existing trees and native ground cover will be provided along the frontage of Britton Parkway.

4. A greenbelt, meandering in width with no portion less than 40 feet in width, will be provided along the frontage of Interstate 5. The greenbelt area will incorporate existing trees and native ground cover, new native plantings to supplement the greenbelt and allow selective pruning to maintain view corridors into the development. If the greenbelt includes stormwater facilities, additional plantings will be required. A landscaping plan for the greenbelt will be developed, reviewed and approved by the City prior to any site work occurring.
5. Trees to be retained will be crown cleaned to remove dead, dying, diseased, structurally defective, or extra branches as necessary. Crown-raising or side-trimming may be necessary to provide for view corridors and clearances for sidewalks and parking lots. All pruning will conform to the ANSI A300³ Standard for Proper Pruning and be completed by or supervised by an ISA Certified Arborist.
6. Greenbelt areas will be protected from grading and construction activities by chain-link fencing and/or other appropriate methods as recommended by the City's Contract Forester. All protection fencing will be removed upon the completion of grading activities.
7. Concurrent with the development agreement process, design vocabulary and architectural standards will be submitted to the City for review and approval.
8. Commercial design review will be required for individual buildings to ensure compliance with the design vocabulary and architectural standards approved as part of the master plan.
9. A pedestrian connectivity plan for all of Phase 1 will be submitted to the City for review and approval.
10. In addition to the above mitigation measures, the City will apply its adopted development regulations pertaining to zoning and land use to mitigate impacts associated with the intensification of land uses in Phase 1 of Lacey Gateway.

Build-out

The following mitigation measures apply to full build-out only of Lacey Gateway:

1. Any additional housing units above the 500 allowed for Phase 1 will require a Comprehensive Plan amendment to change existing zoning and Comprehensive Plan designations.
2. The environmental review associated with the Comprehensive Plan amendment application will include a review of the increase in residential density proposed in the Master Plan through a water demand analysis.
3. An analysis of the impact of proposed higher densities and increased multi-family uses on the UGA will be provided.
4. A market study will be provided to the City in order to determine if additional residential demand exists that would support a Comprehensive Plan and Zoning text amendment.
5. Future projects will incorporate open space areas and plazas as shown in the Master Plan to provide additional gathering spaces specific to this portion of the site.

Unavoidable Impacts

There are no unavoidable significant adverse impacts to land use anticipated to occur as a result of the proposed project.

3.3.2 Transportation

Study Context

Shea, Carr & Jewell, Inc. prepared a Transportation Analysis for the Lacey Gateway Town Center in April 2009. This report provides a comprehensive transportation analysis of specific project-related traffic impacts and mitigation solutions for the Phase 1 development. The report also describes the general conditions anticipated by the 2030 horizon with completion of the entire Lacey Gateway Town Center development.

³ American National Standard (ANSI A300) for Tree Care Operations – Tree, Shrub, and Other Woody Plant Maintenance. American National Standards Institute, Inc., Washington, D.C., 2001.

The proposed Lacey Gateway Town Center will function as a local urban hub and will provide employment and shopping opportunities to residents on-site and in the local environs. Some of the development will also likely serve as a regional draw. The regional traffic will almost exclusively arrive via the freeway, as well as some of the local traffic.

Unlike regionally drawn traffic, much of the local traffic will not be new to the local area but will represent trips diverted from other employment and shopping opportunities. Overall, this could result in a significant increase in traffic volumes on the roadways in the immediate vicinity of the project (i.e., Britton Parkway, Marvin Road and Carpenter Road) but not a significant increase in total traffic flows in the region.

The parameters of the transportation analysis were computed based on this shift in travel patterns throughout the area, as determined using the Thurston Regional Planning Council (TRPC) regional demand model. The analysis focused on the local street system that experienced the most significant change in traffic flow and density. The report documents the results of the intersection and operational analysis for existing traffic conditions and predicted traffic conditions by the completion of Phase 1 development. Study intersections are listed in the Transportation Analysis for the Lacey Gateway Town Center, which is included in Appendix G of this document.

The transportation analysis for full build-out of the project consists primarily of a comparison with previous transportation studies of the Hawks Prairie area. This analysis will be used to gauge and validate that regional and local transportation improvements planned for the area will adequately accommodate traffic volumes generated by the proposal. Because specifics of the full build-out project are not known at this time, more detailed analysis will be conducted as future phases are proposed for development.

Existing Conditions

Land Use and Infrastructure Planning

The City of Lacey began planning for significant industrial, commercial and residential growth in the Hawks Prairie area in the early 1980s. The Marvin Road corridor and the I-5/Marvin Road interchange system were envisioned to serve this anticipated growth. The City's Northeast Area Plan detailed the vision for the area, and its Comprehensive Plan set the land use designations of the Northeast Area and identified the needed transportation facilities for the region. At that time, the population and employment projections for the area predicted that significant growth would occur and that the transportation facilities in place would not be able to adequately serve the new growth.

In the early 2000s, the City completed several improvements to help accommodate the anticipated growth, including:

- Widening Marvin Road to a four-lane boulevard between I-5 and Willamette Drive, including installation of two multi-lane roundabout intersections
- Constructing Britton Parkway, a new east-west arterial between Marvin Road and Carpenter Road
- Rebuilding and widening the Marvin Road/Interstate 5 diamond interchange. Future Phase 2 improvements will convert the diamond configuration to a "single point urban interchange" (SPUI).

Additionally, the City of Lacey, working with the Washington State Department of Transportation (WSDOT), Federal Highway Administration (FHWA), and local stakeholders, is currently conducting an analysis of the long range needs for the Lacey transportation network. The Lacey Transportation Systems Analysis and Alternatives Evaluation (LTSAAE) study is evaluating the future traffic demand in Lacey generally near Interstate 5 between the Nisqually Interchange and the Sleater-Kinney Interchange. The Lacey Gateway Town center is within the LTSAAE study area and the eventual recommendations of the study will accommodate the population and employment projected for full build of the Lacey Gateway Town Center.

Roadway Inventory

Several existing roadways that will provide major routes for access to Lacey Gateway are described below. Roadways are designated by "functional classification"; i.e., arterial, commercial collector, neighborhood collector, etc. The functional classification of a roadway is based on the service it provides and the volume of traffic it carries, and each class offers varying degrees of access and mobility.

Britton Parkway

Britton Parkway is an east-west boulevard that serves as a connection between Marvin Road and Carpenter Road. It has a single vehicle travel lane and a bicycle lane in each direction and a posted speed limit of 40 mph.

Marvin Road

This is a north-south major arterial roadway that provides access to the Hawks Prairie area of Lacey from I-5. North of I-5, Marvin Road has two lanes in each direction, sidewalks, bicycle lanes and street lighting, and a posted speed limit of 35 mph. Between Britton Parkway and Hawks Prairie Road, the roadway has a single lane in each direction with asphalt shoulders in most locations and a posted speed limit of 45 mph.

Carpenter Road NE

Carpenter Road NE is a north-south major arterial with one travel lane in each direction and a posted speed limit of 35 mph north of Martin Way and 50 mph north of Britton Parkway. It intersects Britton Parkway and Draham Street NE at two tee intersections which are offset by more than 500 feet.

Willamette Drive

Willamette Drive is a boulevard with a posted speed limit of 40 mph. It has two lanes in each direction, a landscaped median with turn lanes at primary intersections, street lighting, bicycle lanes and sidewalks. This roadway was designed to serve as a primary access to the Hawks Prairie and Meridian Campus Planned Communities and was recently extended to intersect with Marvin Road, north of Hawks Prairie Road.

Traffic Volume Data

Traffic counts at the study intersections were taken in 2006 and 2007 during the pm peak hour. The counts were conducted between 4:00 pm and 6:00 pm. The traffic data was collected for the evening peak period because it represents the highest level of traffic for area roadways. Traffic counts that were taken in 2006 were increased by 4% to represent 2007 evening peak baseline conditions. Figure 3-13 shows the existing 2007 PM Peak hour traffic volumes for the study intersections.

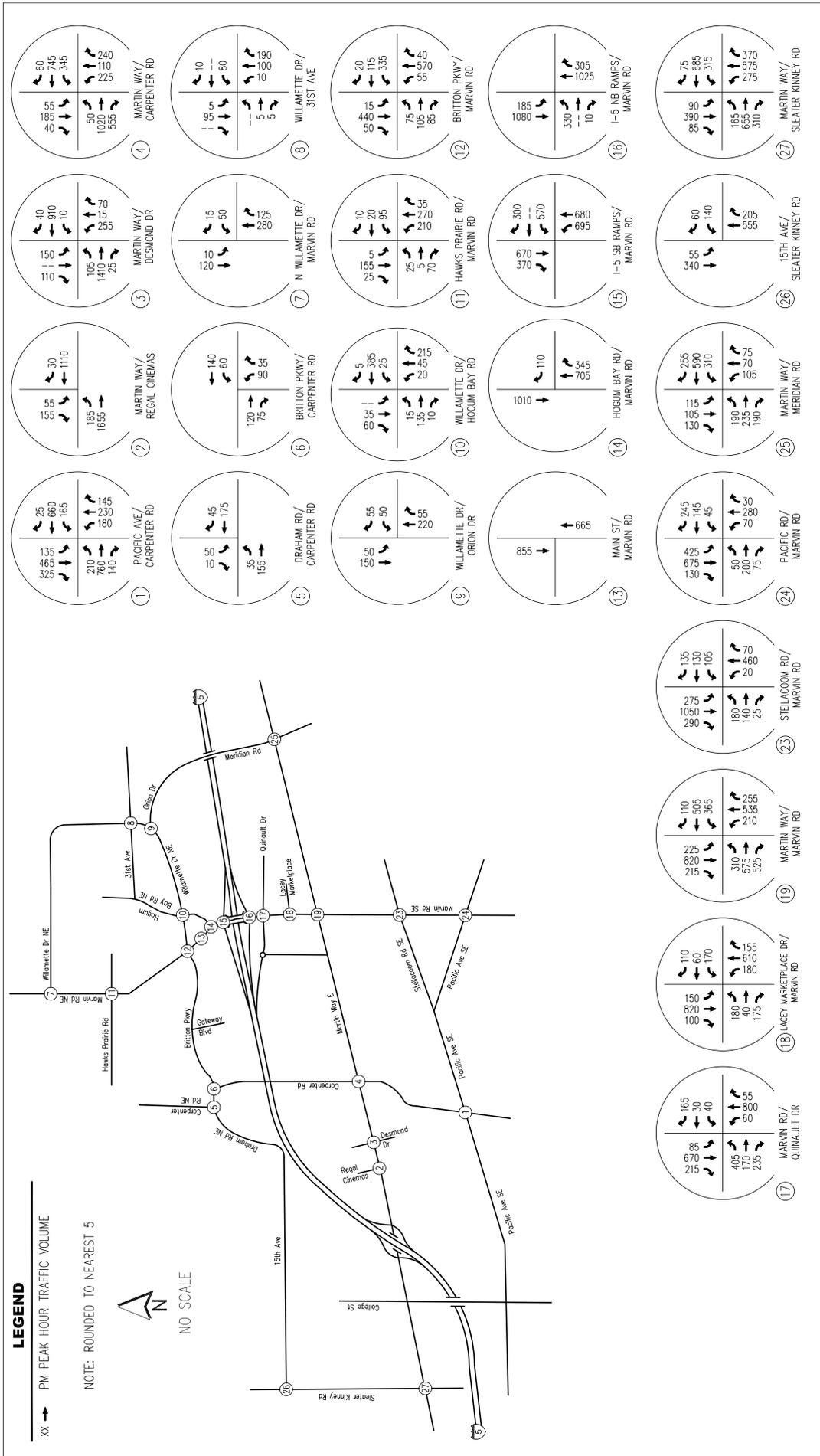


Figure 3.13 - Existing 2007 PM Peak Hour Traffic Volume

Future Traffic Conditions

The City of Lacey, Thurston County and WSDOT have a number of roadway and highway improvements planned within the study area. The projects are in varying phases of development and may or may not be in place by the completion of Lacey Gateway Town Center. A complete list of the projects and current schedule of implementation are included in Appendix G.

Lacey Gateway Town Center Phase 1

Phase 1 of the Lacey Gateway development consists of approximately 120 acres of land, located primarily within the easterly portion of the site. Phase 1 development will provide the core of the mixed-use town center. As proposed, Phase 1 will consist of approximately 1,200,000 sf of commercial/ office space and 500 housing units. It is also anticipated that a portion of this phase will be reserved for civic uses. Employment estimates for the build-out of Phase 1 of the project anticipate 2,600 jobs within Lacey Gateway Town Center.

The following table shows the proposed development plan that was analyzed in the TIA.

Table 3-15 – Lacey Gateway Phase 1

Land Use	Size	Unit	Employees per Unit	Number of Employees
Shopping Center	1,026,000	1,000 sf	2	2,052
General Office	100,000	1,000 sf	4	400
Civic uses	30,000	1,000 sf	1	30
Hotel with Conference Center	119	Rooms	1	119
Residential Townhouse/Condominium	500	Dwellings	0	0

Site Access

A number of new roads are planned as part of Phase 1. Concurrent with Cabela's opening, a new north-south roadway, Gateway Boulevard, was completed with a roundabout intersection at Britton Parkway. Portions of Main Street have been constructed, with future plans to extend this street through the site to connect to Marvin Road. In addition to Gateway Boulevard, Central and Eastern Parkways are planned as north-south roads that will access Britton Parkway at new intersections. The extension of Main Street east to Marvin Road will provide access to Lacey Gateway from Marvin Road. In addition to the streets described above, individual uses within the project will be served by a network of internal roadways. The internal street system will be further identified as the site plan is developed.

Figure 3-14 illustrates the proposed site plan and major access system.

LACEY GATEWAY MASTER PLAN

TOWN CENTER TYPICAL EXHIBIT
LACEY, WASHINGTON



SITE DATA:

LANDSCAPED AREA	128 ACRES
ANCHOR	24,000 S.F.
JUNIOR ANCHOR	12,000 S.F.
RETAIL SHOPS	12,000 S.F.
LIBRARY	12,000 S.F.
HOTEL	12,000 S.F.
FUTURE MEDICAL / OFFICE / RESIDENTIAL	12,000 S.F.
RESIDENTIAL	12,000 S.F.
FUTURE DEVELOPMENT AREA	12,000 S.F.
OPEN SPACE AREA	12,000 S.F.
LANDSCAPE AREA	12,000 S.F.

LEGEND

CINEMA/ENTERTAINMENT	ANCHOR	JUNIOR ANCHOR	RETAIL SHOPS	LIBRARY	HOTEL	FUTURE MEDICAL / OFFICE / RESIDENTIAL	RESIDENTIAL	FUTURE DEVELOPMENT AREA	OPEN SPACE AREA	LANDSCAPE AREA
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NOTE: THE PLACEMENT OF TYPICAL SITE LAYOUT FOR PHASE 1. THE ACTUAL SITE LAYOUT MAY VARY BASED UPON ACTUAL USE AND SITE REQUIREMENTS.

Figure 3.14 - Conceptual site plan Phase 1

Projected 2010 Volumes

The Hawks Prairie area of Lacey is projected to experience a significant amount of residential, commercial and industrial growth. The *Lacey Gateway Town Center* project will represent a large component of the overall traffic growth in the area. If realized, the projected growth in the Hawks Prairie area will exceed the amount of residential and commercial land-use that currently exists. This will create a fundamental change in the travel patterns on the roadways within north Lacey.

To account for the changes in travel patterns, the traffic volume projections used in this analysis were prepared using the regional Emme/2 transportation demand model. The model, prepared by Thurston Regional Planning Council (TRPC), has been calibrated to represent existing 2007 traffic conditions.

The 2010 “no-build” and “build” model scenarios were created by incrementally increasing the existing household and employment in the 2007 baseline to include the first two components for the no-build scenario and all three components for the build scenario:

- Non-specific background growth
- Pipeline development projects
- *Lacey Gateway Town Center Phase 1*

The build and no-build scenarios each include completion of the core roadways planned for the *Lacey Gateway Town Center* area including:

- East-West connection from Gateway Blvd to Marvin Road
- Central Parkway from Britton Parkway to Main Street
- Eastern Parkway from Britton Parkway to Main Street

The build and no-build scenarios differ only in the inclusion of the 2,600 employees and 500 residential units predicted for the *Lacey Gateway Town Center Phase 1* project for the build scenario. The individual components are described below.

Background Growth

The 2007 household and employment were increased incrementally to represent three years of “background growth” county-wide. The growth increment was determined by calculating the straight line growth between the land-use growth projections provided by TRPC for all Traffic Analysis Zones (TAZ’s) in the entire county. In the regional planning forecasts, the household growth is projected in five year increments and the employment growth is projected between 2005 and 2030. Three years of the household and employment growth was added to each TAZ.

Pipeline Development Projects

A pipeline development project is defined as a development in the project area that is either under construction, approved for construction or in the permitting process. For this study, 21 residential developments and 14 commercial projects were included in the pipeline development list. The employment characteristics of the commercial developments were estimated using the same employment density factors used in the regional model. In total, over 4,500 residential units and over 5,000 employees were added to the 2010 model to reflect pipeline development.

Gateway Town Center Phase 1 Traffic

The projected household and employment for the development (as shown in Table 3.16) was input into the traffic demand model to prepare 2010 traffic volume assignments with the *Lacey Gateway Town Center Phase 1* development.

Based on the transportation demand model, the *Lacey Gateway Town Center Phase 1* development will produce and attract 2,874 trip ends (1,211 inbound and 1,663 outbound) during the evening peak hour. It should be noted that many of these trip ends would not be new to the overall roadway network but would

represent re-distributed commercial trips. While this will result in greatly increased traffic volumes on some roadways in the immediate vicinity, other roadways will experience a shift in traffic patterns but not an appreciable increase in overall volumes.

Project-Generated Traffic Volume Comparison

In order to validate the traffic modeling process used to produce site-generated traffic volumes, an alternate trip generation calculation was performed using the standard methodologies contained in the Institute of Transportation Engineers (ITE) *Trip Generation* report. The ITE method indicates the development would generate 2,721 trip ends (1,312 inbound and 1,409 outbound) during the evening peak hour. The following table summarizes the trip generation values based on the regional model method used for this study and the standard ITE procedures.

Table 3-16 Trip Generation Comparison

Method	Total Trips	Inbound	Outbound
Traffic Demand Model	2,874	1,211	1,663
ITE Trip Generation Report	2,721	1,312	1,409

While the trip generation values are comparable, the regional model provides a tool to predict shifts in traffic and changes in patterns within the Thurston region, whereas the ITE values can only predict the trip potential and behavior for the specific development proposal with no ability to assess regional shifts in traffic. Given these factors, the proposed modeling process and analysis provides the most comprehensive view and reliable estimates of traffic volumes for the *Lacey Gateway Town Center*.

Model Post-Processing

While the model is calibrated to replicate existing travel patterns, traffic volumes on individual roadways vary somewhat from existing traffic counts. To account for this variance, the transportation model traffic volume assignments were “post-processed” to align them with existing “ground counts.” Specifically, the traffic volume growth predicted by the transportation model was added to the actual 2007 traffic volumes to prepare the 2010 traffic volumes used in the analysis.

The predicted traffic growth generated by pipeline developments and background traffic growth at the study intersections is shown on **Figure 3-15**. The predicted traffic growth including pipeline developments, background traffic and *Gateway Town Center Phase 1* is shown on **Figure 3-16**.

The projected 2010 traffic volumes without the *Lacey Gateway Town Center* project are shown on **Figure 3-17**. The projected 2010 traffic volumes with the *Lacey Gateway Town Center* project are shown on **Figure 3-18**.

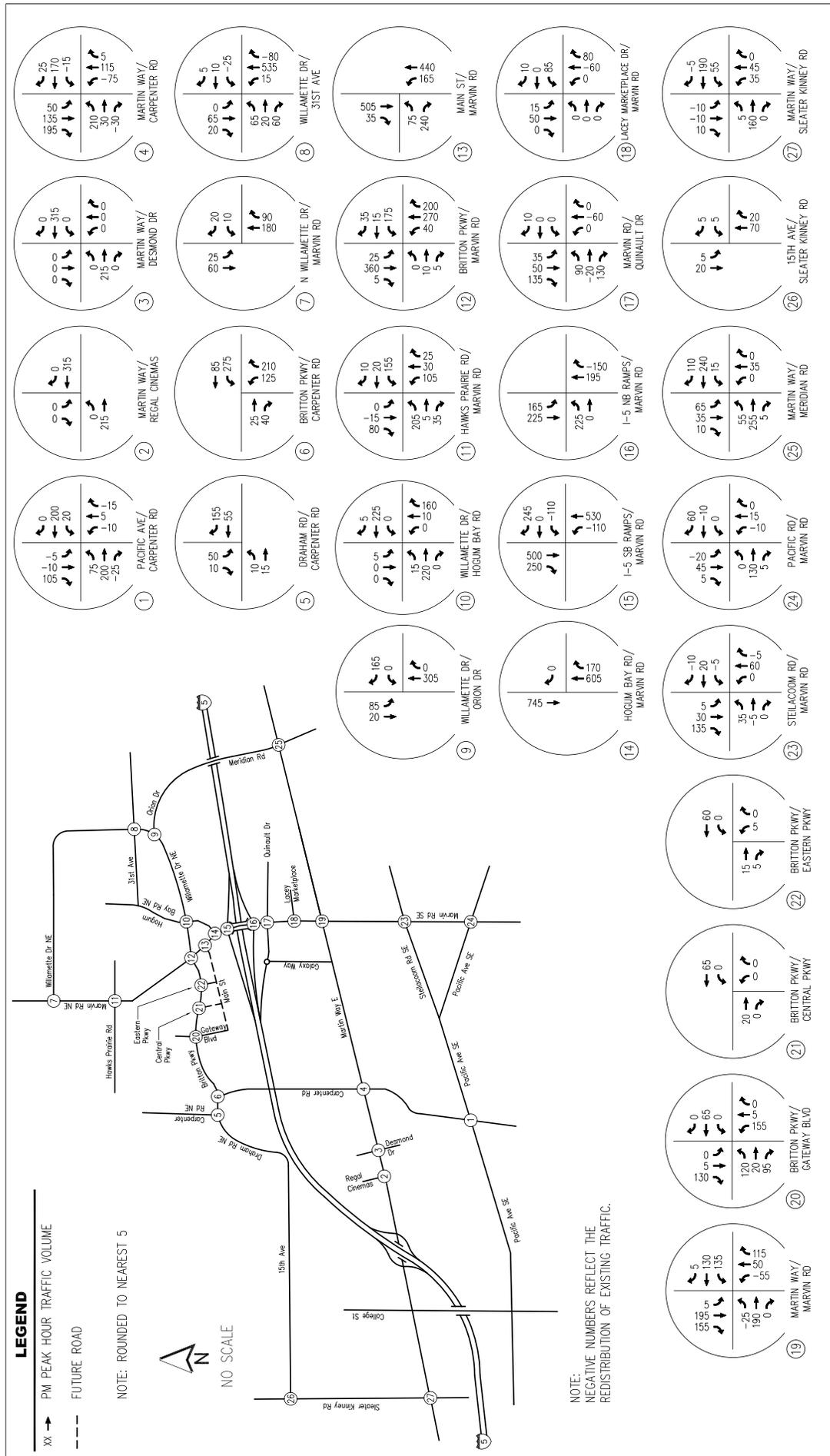


Figure 3.15 - Background and Pipeline Traffic Growth 2007 to 2010

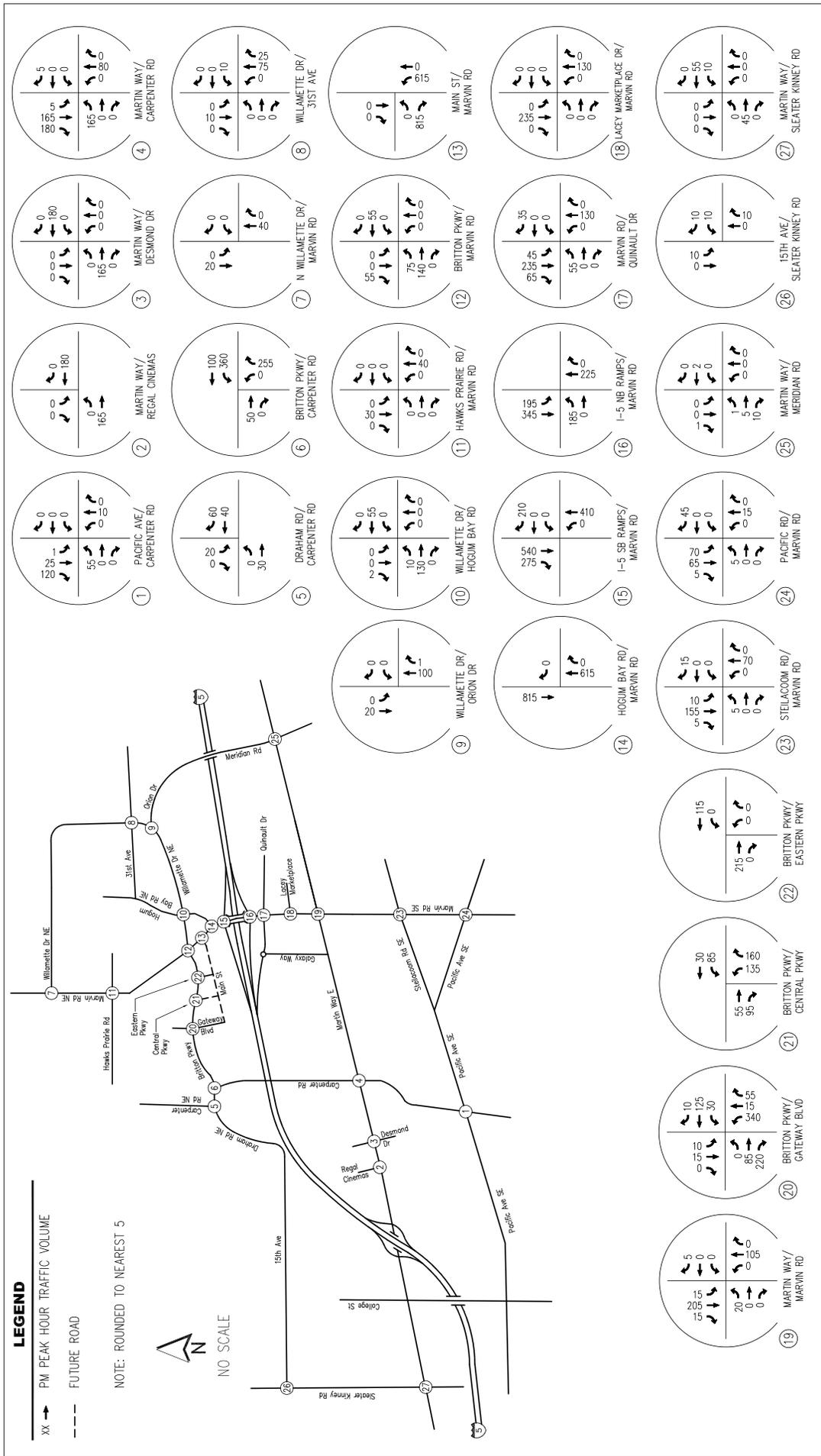


Figure 3.16 - Gateway Town Center Phase 1 Total Site-Generated Traffic Volumes

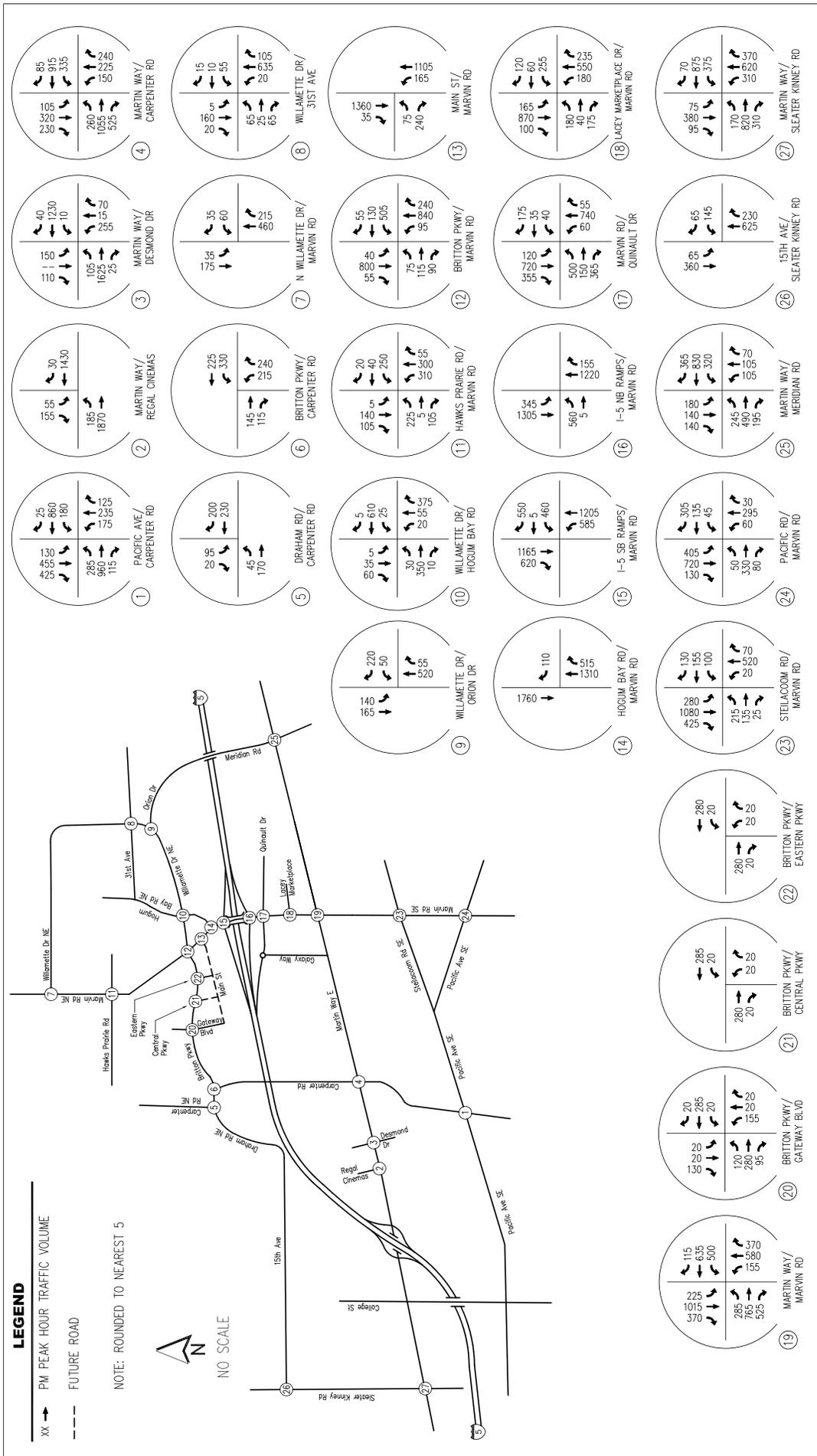


Figure 3.17 - Projected 2010 PM Peak Hour Traffic Volumes w/o project

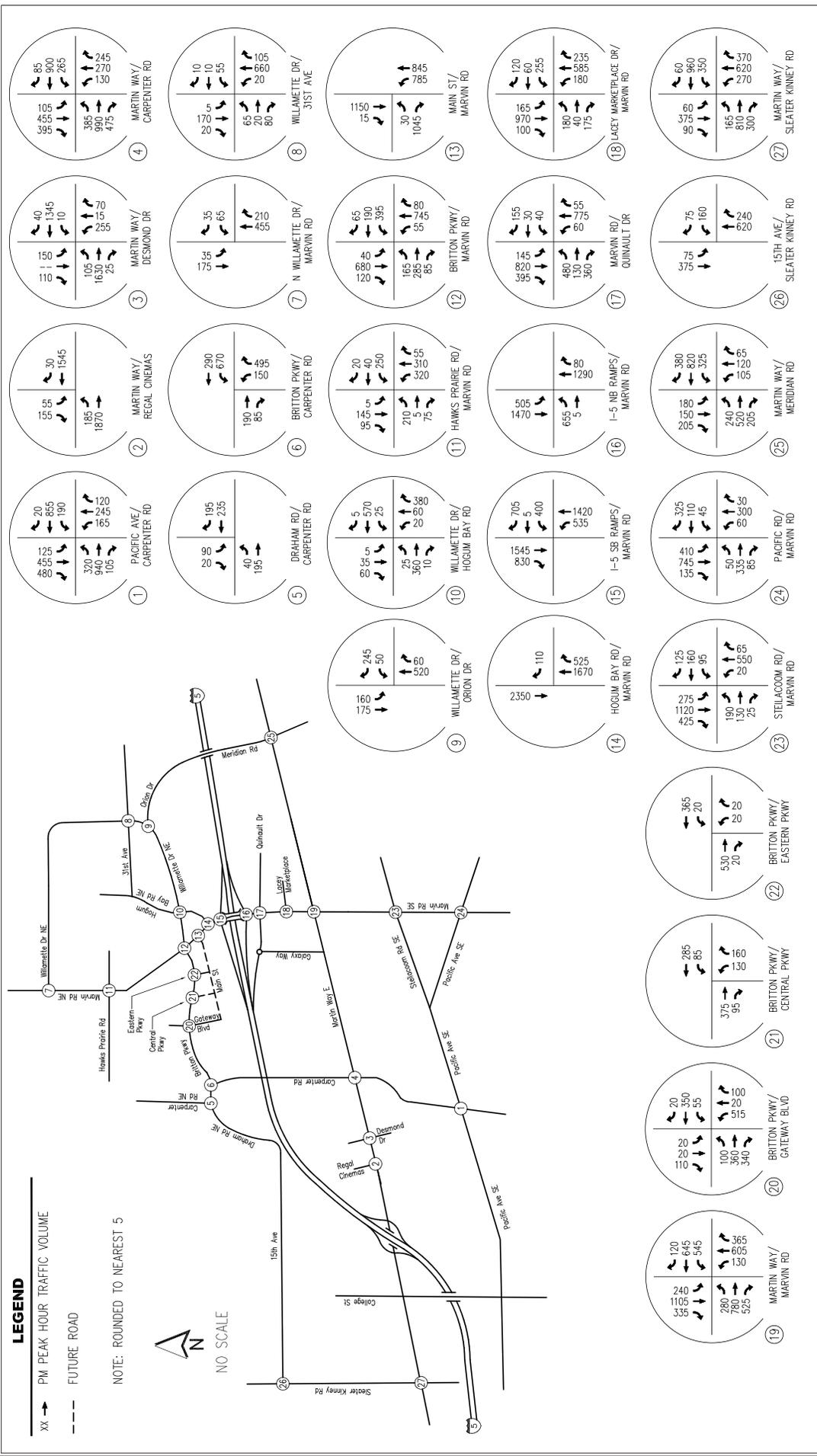


Figure 3.18 - Projected 2010 PM Peak Hour Traffic Volumes w/ project

Traffic Operations Analysis

Intersection Level of Service Methodologies

Traffic analyses were conducted in order to identify any existing street and intersection deficiencies within the study area for the 2007 base year and 2010 project completion horizon year. Three types of intersections are found in the study area:

- Unsignalized (stop sign control)
- Signalized control
- Modern roundabouts

Unsignalized Intersections

Stop sign-controlled intersections were analyzed using the Highway Capacity Software that uses the methodology in the 2000 *HCM*. The *HCM* uses Level of Service (LOS) to describe the operating conditions at an intersection. LOS is a qualitative term that describes conditions a driver will experience while traveling on a particular street or highway during a specific time interval. It ranges from A (very little delay) to F (long delays and congestion).

Levels of Service calculations for intersections determine the amount of “control delay” (in seconds) that drivers will experience while proceeding through an intersection. Control delay includes all deceleration delay, stopped delay and acceleration delay caused by the traffic control device. The Level of Service is directly related to the amount of delay experienced.

For intersections under stop sign control for the minor street, the LOS of the most difficult movement (typically the minor street left-turn) represents the intersection Level of Service. Table 3-17 below shows the Level of Service criteria for unsignalized intersections.

Table 3-17 – Level of Service Criteria for Stop Sign-Controlled Intersections

Level of Service	Average Control Delay (seconds/vehicle)
A	≤ 10
B	> 10 – 15
C	> 15 – 25
D	> 25 – 35
E	> 35 – 50
F	> 50

Signalized Intersections

The *Highway Capacity Manual* also presents capacity analysis results in terms of LOS for signalized intersections. The *HCM* bases the LOS criteria on overall average delay a vehicle may experience at the intersection during the analysis period (for this study, the evening peak hour). LOS delay criteria for signalized intersections are shown in Table 3-18 below.

Table 3-18 – Level of Service Criteria for Signalized Intersections

Level of Service	Average Control Delay (seconds/vehicle)
A	≤ 10
B	> 10 – 20
C	> 20 – 35
D	> 35 – 55
E	> 55 – 80
F	> 80

Roundabout Intersections

The roundabout analysis was prepared using the SIDRA software package. Table 3-19 below lists LOS delay criteria for roundabout intersections.

Table 3-19 – Level of Service Criteria for Roundabout Intersections

Level of Service	Average Control Delay (seconds/vehicle)
A	≤ 10
B	> 10 – 20
C	> 20 – 35
D	> 35 – 55
E	> 55 – 80
F	> 80

Level of Service Standards

The City of Lacey has adopted Level of Service (LOS) D as the concurrency standard for much of the study area. The City has also identified areas of the City where different LOS standards apply.

The “downtown core” (defined as the area between and including Martin Way, Lacey Boulevard, the western City limits and Carpenter Road) has an established LOS E standard. The Pacific Avenue/Carpenter Road, Martin Way/Desmond Drive and Martin Way/Regal Cinemas intersections are within the downtown core area and are held to a LOS E standard.

Strategy Corridors are defined as streets or intersections which have been constructed or improved to 4 or 5 lanes in width between intersections, or are streets or intersections bounded by existing land use or environmental features that preclude further widening. Strategy Corridors are in areas where, pursuant to other policies of the City, growth is encouraged and typically coincides with the designation of a High Density Corridor, City Centers, Core Areas or Activity Centers where a concentration of commercial and other uses is desired, especially when that growth increases densities and proximity of different types of land use.

Peak hour vehicular congestion in these corridors is likely to exceed levels of service which would otherwise be acceptable within the transportation system. Strategy corridors are identified and adopted through the City’s Transportation Plan. Even though strategy corridors are considered exempt from the level of service standards for physical improvements to the corridor, alternative mitigation strategies tailored to the specific corridor and the project’s proportionate impacts are still applicable. Such strategy corridor mitigation may include an appropriate mix of:

1. High quality and fully integrated bike, pedestrian, carpool, vanpool, and transit facilities and services.
2. Complete and connected street grids.
3. Transportation technology measures that improve overall system operating efficiency and safety.
4. Access management.
5. Parking management.
6. Aggressive travel demand management strategies; and/or
7. Land use intensification.

The Martin Way corridor from the west City limit line (Galaxy Dr NE, for purposes of the SEIS) through Marvin Road is built to its ultimate thru lane configuration and with adoption of the next Transportation Plan update, will be considered a strategy corridor. Marvin Road from Interstate 5 to Pacific Avenue has recently been upgraded to a five-lane cross-section, and additional widening is not anticipated. This corridor meets the definition of a strategy corridor and for purposes of the transportation analysis, is considered built to its ultimate thru lane configuration. Consideration to designate this corridor as a strategy corridor should occur

as part of the City's Transportation Plan.

Although LOS criteria are deemed not to apply at these locations, additional types of network improvements consistent with the strategies identified above should be considered to facilitate improved traffic flow regionally and in the localized area. Strategies include:

- Constructing intersection modifications
- Constructing new roadway connections
- Providing enhanced pedestrian facilities
- Encouraging transit usage
- Planning mixed-use developments, which can reduce the need to drive off-site for services

The Lacey Gateway Town Center will create new roadway connections by developing an internal road system consistent with the City of Lacey's 1998 Transportation Plan. The 1998 plan identified a system of interconnecting roadways in support of the Hawks Prairie Business District consisting of a roadway that extended west from Marvin Road through the District with four roadways extending north from the east-west road to Britton Parkway. Both Marvin Road and Britton Parkway were designed and constructed with these future connections in mind.

The internal road system of the Lacey Gateway Town Center will create an east-west connection between Marvin Road and Gateway Boulevard and two additional connections to Britton Parkway east of Gateway Boulevard.

As a result of the mix of uses, intensity and density anticipated within the Lacey Gateway Town Center there is the opportunity to provide enhanced multi-modal opportunities such as strong pedestrian and bicycle routes, facilitating transit service to serve the Town Center, identifying/reserving areas for future transit center activities, accommodating park and ride facilities and working with employers to develop commute trip reduction plan. The density of compatible land uses as the project proposes and the opportunity for enhance multi-modal strategies will allow a significant amount of the traffic to be retained on-site, reducing the amount of vehicle miles traveled (VMT) and effect on other area roadways.

Traffic Volume Analysis Scenarios

The capacity analyses were completed for traffic volume conditions expected to occur during the evening peak period at all study intersections for the following three traffic volume scenarios:

- Existing 2007 traffic volumes
- Projected 2010 traffic volumes without *Lacey Gateway Town Center Phase 1*
- Projected 2010 traffic volumes with *Lacey Gateway Town Center Phase 1*

Intersection Level of Service

Tables 3-20 – 3-22 below summarize the LOS for each of the study intersections during the PM peak period. A brief description of intersection operations follows the tables.

Table 3-20 - Level of Service Summary – Signalized Intersections

Intersection	Level of Service			
	Base Year 2007	Projected 2010 Without Project	Projected 2010 With Project	Projected 2010 With Mitigation
Carpenter Road/Pacific Avenue	E	E	E	
Regal Cinemas/Martin Way	B	B	C	
Desmond Drive/Martin Way	D	D	D	
Martin Way/Carpenter Road	D	F	F	D
Marvin Road/SB I-5 Ramps	C	D	F	D ⁽¹⁾
Marvin Road/NB I-5 Ramps	C	C	C	
Marvin Road/Quinault Drive	D	D	D	
Lacey Marketplace/McDonalds/ Marvin Road	D	D	D	
Marvin Road/Martin Way	D	E	E	
Steilacoom Road/Marvin Road	D	D	D	
Meridian Road/Marvin Road	C	D	D	
Sleater-Kinney Rd/Martin Way	E	E	E	

⁽¹⁾ Potential interim mitigation of constructing a second westbound to northbound right turn lane on the SB off-ramp.

As shown in Table 3-20 above, the following signalized intersections will operate at a LOS F by the 2010 horizon with traffic from the Lacey Gateway Town Center project:

- Martin Way/Carpenter Road
- Marvin Road/Southbound I-5 Ramps
- Marvin Road/Martin Way (LOS E)

Martin Way/Carpenter Road

Completion of Phase 1 of the Lacey Gateway Town Center project will significantly increase the traffic flows and delay at the Martin Way/Carpenter Road intersection. This intersection is planned to be rebuilt to accommodate the future five-lane widening of the Carpenter Road corridor. With completion of the planned intersection improvements, the intersection would operate at a LOS D condition with no movement operating below a LOS E. The design and permitting phase is under way and is a joint project with the City of Lacey and Thurston County. The City and County are collecting funds for the construction of the Carpenter Road corridor and are committed to pursuing funding, however there is currently no time frame for the construction of the improvement. If funding is obtained the developer will still pay a proportionate share of the cost based on the Lacey Gateway project’s proportional benefit.

Marvin Road/Southbound Interstate 5 Ramps

With the completion of Phase 1 of Lacey Gateway Town Center, the intersection will fall to a LOS F condition with significant delay and vehicle queuing predicted for the southbound approach of Marvin Road. To accommodate the increase in traffic associated with the development, a second exclusive right-turn lane on the off-ramp could be constructed. With this improvement in place, the intersection would improve to an overall LOS D condition.

The Marvin Road/Interstate 5 interchange was designed for completion in two phases. Phase 1 improvements resulted in the current diamond configuration. Phase 2 includes future conversion to a Single Point Urban Interchange (SPUI) configuration. The design of the SPUI would provide two right-turn lanes on the southbound off-ramp within the existing pavement width. No schedule has been established for the completion of Phase 2 of the interchange. The City of Lacey is also pursuing an option to construct a slip lane from the SB off-ramp that would access directly onto Hogum Bay Road. If either the SPUI or slip lane

to Hogum Bay is constructed, it would negate the need for the additional right turn lane at Marvin Road.

Marvin Road/Martin Way

By 2010, this intersection will decline to LOS E with or without the Lacey Gateway Phase 1 project. The City of Lacey has determined that this intersection is built to its ultimate configuration, and no additional widening or improvements are anticipated at this location. The City anticipates adopting both Marvin Road and Martin Way as strategy corridors in the next Transportation Plan update. Since it is anticipated to be designated as a strategy corridor, other sorts of network improvements should be implemented to improve traffic congestion. Multi-modal opportunities being considered for the Lacey Gateway, including mixed-use development, enhanced pedestrian connectivity and opportunities for transit and ride-sharing, are the types of strategies intended for built corridors such as Marvin Road.

Table 3-21 - Level of Service (LOS) Summary – Stop-Sign Controlled Intersections –

Intersection	Level of Service					
	Existing 2007 Volumes		Projected 2010 Without Project		Projected 2010 with Project	
	Worst Movement	Intersection Average	Worst Movement	Intersection Average	Worst Movement	Intersection Average
Draham Road/Carpenter Road	B	A	B	A	B	A
Britton Pkwy/ Carpenter Road	B	A	F	F	D ⁽¹⁾	C ⁽¹⁾
Willamette Drive (north) /Marvin Road	B	A	C	A	C	A
Willamette Drive/31 st Avenue	A	A	C	C	C	C
Willamette Drive/Orion Drive	B	A	C	A	C	A
Willamette Drive/Hogum Bay Road	B	A	D	B	D/C ⁽²⁾	B/B ⁽²⁾
Marvin Road/Hogum Bay Road	B	A	C	A	C	A
Sleater-Kinney Road/15 th Avenue NE	F	B	F ⁽³⁾	B ⁽³⁾	F	C
Britton Parkway/Central Parkway					D	A
Britton Parkway/Eastern Parkway					C	A

⁽¹⁾ With the proposed construction of a traffic signal system as project mitigation.

⁽²⁾ With the addition of northbound and southbound right-turn lanes on Hogum Bay Road.

⁽³⁾ For the 2010 horizons, the westbound approach is assumed to have separate right-turn and left-turn lanes.

By 2010, with the addition of background traffic, the following stop-sign controlled intersections would operate below adopted service levels without traffic from Phase 1 Lacey Gateway Town Center:

- Britton Parkway/Carpenter Road
- Sleater-Kinney Road/15th Avenue NE

Britton Parkway/Carpenter Road

Without Lacey Gateway Town Center traffic, this intersection will fall to a LOS F condition by 2010. The delay and congestion will increase with the addition of traffic from Phase 1 Lacey Gateway Town Center. Construction of a traffic signal or modern roundabout could be considered to improve the intersection to acceptable service levels. With installation of a signal at this intersection, the intersection would operate at a LOS C condition in the evening peak hour for the 2010 with-project conditions. If a traffic signal system is selected for this location, traffic signal warrants should be evaluated and met prior to construction of the improvement.

Sleater-Kinney Road/15th Avenue NE

Under the current configuration, the intersection operates at a LOS F for the minor street approach and

an intersection average of LOS B. The proponent of another approved development has been conditioned to construct an additional approach lane on 15th Avenue NE at this intersection to allow for separate right-turn and left-turn lanes. It is understood that this improvement will be constructed prior to development of the Lacey Gateway Town Center. For the 2010 horizon without Lacey Gateway Town Center Phase 1, the intersection would operate at a LOS F for the minor street left-turn and an intersection average of LOS B. With the addition of project traffic, the overall intersection delay would increase by three seconds to a LOS C condition.

Table 3-22 – Level of Service Summary –Roundabout Controlled Intersections – PM Peak Hour

Intersection	Level of Service		
	Base Year 2007	Projected 2010 Without Project	Projected 2010 With Project
Hawks Prairie Road/Marvin Road			
Marvin Road NE/Britton Parkway	B	C	C
Marvin Road/Main Street	A	B	B
Britton Parkway/Gateway Blvd.		A	D/ A ⁽¹⁾
Marvin Road NE/Pacific Avenue		A	B
	A	B	B

⁽¹⁾ with modifications to roundabout

Marvin Road/Main Street

This intersection currently exists as a two-circulating lane modern roundabout that provides u-turn operation for vehicles exiting Hogum Bay Road with a destination southbound on Marvin Road. The northbound and southbound approaches each provide two lanes. It has been planned for this intersection to function as a four-leg roundabout with new east-west approaches (Main Street) serving future development in the area.

Development of the Lacey Gateway Town Center will require construction of Main Street west of Marvin Road into the project site. This will create the west leg of the roundabout. It is anticipated that the east leg will be completed in the future, by others, to serve development on the east side of Marvin Road.

As previously envisioned, the northbound and southbound approaches would remain unchanged except for the completion of a third southbound lane on Marvin Road between Main Street and Interstate 5. The new west leg of Main Street will provide two approach and departure lanes. The eastbound approach will have separate right-turn and left-turn lanes. The right-turn lane will operate as a “free-flow” lane into the third southbound lane on Marvin Road.

With this configuration, the intersection would operate at a LOS A condition during the PM peak hour by the 2010 horizon without Lacey Gateway Town Center. With completion of Phase 1, project traffic on Main Street would increase by approximately 1,350 vehicles during the evening peak hour. With this increase in traffic, the southbound approach of Marvin Road at the RAB would fail, and the overall intersection LOS would fall to a marginal LOS E condition.

In addition to the poor Level of Service, the intersection would experience severe vehicle queuing on the southbound approach. The analysis indicates that the 95th percentile queue would extend approximately 1,570 feet to the north. The upstream Marvin Road/Britton Parkway roundabout is located approximately 800 feet north of the Main Street roundabout. The predicted queuing at Main Street would extend through Britton Parkway and interfere with the operation of the Marvin Road/Britton Parkway intersection.

To accommodate the increased traffic flow and minimize delay and queuing, it is recommended that modifications to the Marvin Road/Main Street roundabout be implemented. Because of the high northbound to westbound left-turn movement, an additional left-turn lane is needed for this approach. To accommodate an additional left-turn lane, the northbound approach will be widened to provide three entry lanes. The

northbound approach would then provide an exclusive left-turn lane, a shared left-turn/through lane and an exclusive through lane. The remainder of the RAB would continue to operate with two circulating lanes.

With this improvement in place, the southbound approach would improve to a LOS C condition and the overall intersection would improve to an LOS B. Also, the predicted 95th percentile queuing would improve at every approach with the southbound approach queue reducing from 1,570 feet to approximately 375 feet.

Lacey Gateway Town Center Full-Build

The Lacey Gateway project consists of approximately 250 acres of land located north of I-5 and south of Britton Parkway. The proposed development is divided into two distinct phases. Phase 1 is envisioned as an intensely developed mixed-use retail and commercial area. Up to 500 residential units are envisioned in Phase 1. Implementation of future phases of the Lacey Gateway Town Center is anticipated to be conducted in several phases. The exact composition and location of these phases is not known at this time. Additional studies will be required to address future impacts associated with the buildout scenario.

Projected 2030 Traffic Volumes

The City of Lacey is currently finalizing a comprehensive study of future roadways in the study area (LTSAAE Study). Several future deficiencies on facilities in the study area have been identified to accommodate community wide growth for the 2030 horizon. Notable deficiencies include the Martin Way corridor between Sleater-Kinney Road and the Martin Way/I-5 interchange and Marvin Road from Martin Way to Britton Parkway. The study has identified potential surface street improvements that could help alleviate the predicted congestion along those corridors and the rest of the study area. Improvements, such as a new I-5 frontage road within the immediate vicinity of the Lacey Gateway project are intended to provide enhanced access along I-5 between Marvin and Carpenter Roads. Corridor preservation along I-5 that is consistent with Appendix J and the LTSAAE Study needs to be considered with development of Phase 1 in order to ensure the future ability to construct the identified improvements.

Sufficient detail is known about the proposed development types, general locations, and potential impacts of Phase 1 to allow a project level review. Future phases are less well developed due to the uncertain nature of how a site of the Lacey Gateway project's magnitude and build-out time frame will occur. Future development outside the area defined as Phase 1 will therefore receive separate environmental review at the time the development occurs.

Pedestrian and Non-motorized Circulation

Streets within Lacey Gateway Town Center are designed to enhance a pedestrian-friendly environment, and a variety of open spaces are identified in the Master Plan. The Central Greenway runs east to west through the site. This open space is intended to provide walking and cycling trails through the site, with a possibility of connecting with regional open space areas such as the Nisqually Delta and the Chehalis-Western Trail in the future.

Lacey Gateway Town Center will incorporate transit-friendly design and other techniques to reduce dependency on the single occupancy vehicle. The increased density within the Gateway area will better support mass transit and other commute options. At full build-out, a regional transit center and parking structure are anticipated to be incorporated into the project. Such a facility would reduce the number of vehicles commuting from Lacey Gateway Town Center, as well as the number of vehicles used for commuting on I-5 to the east and west of the Town Center.

While a self-contained transit center, similar to the facility in downtown Olympia, may ultimately be the appropriate type of facility for the full build out scenario, a modified or smaller transit center facility would likely be more appropriate for Phase 1. This type of transit facility could be designed as an on-street facility, utilizing wider streets with large pull-out areas for passenger drop off and pick up. Another important design

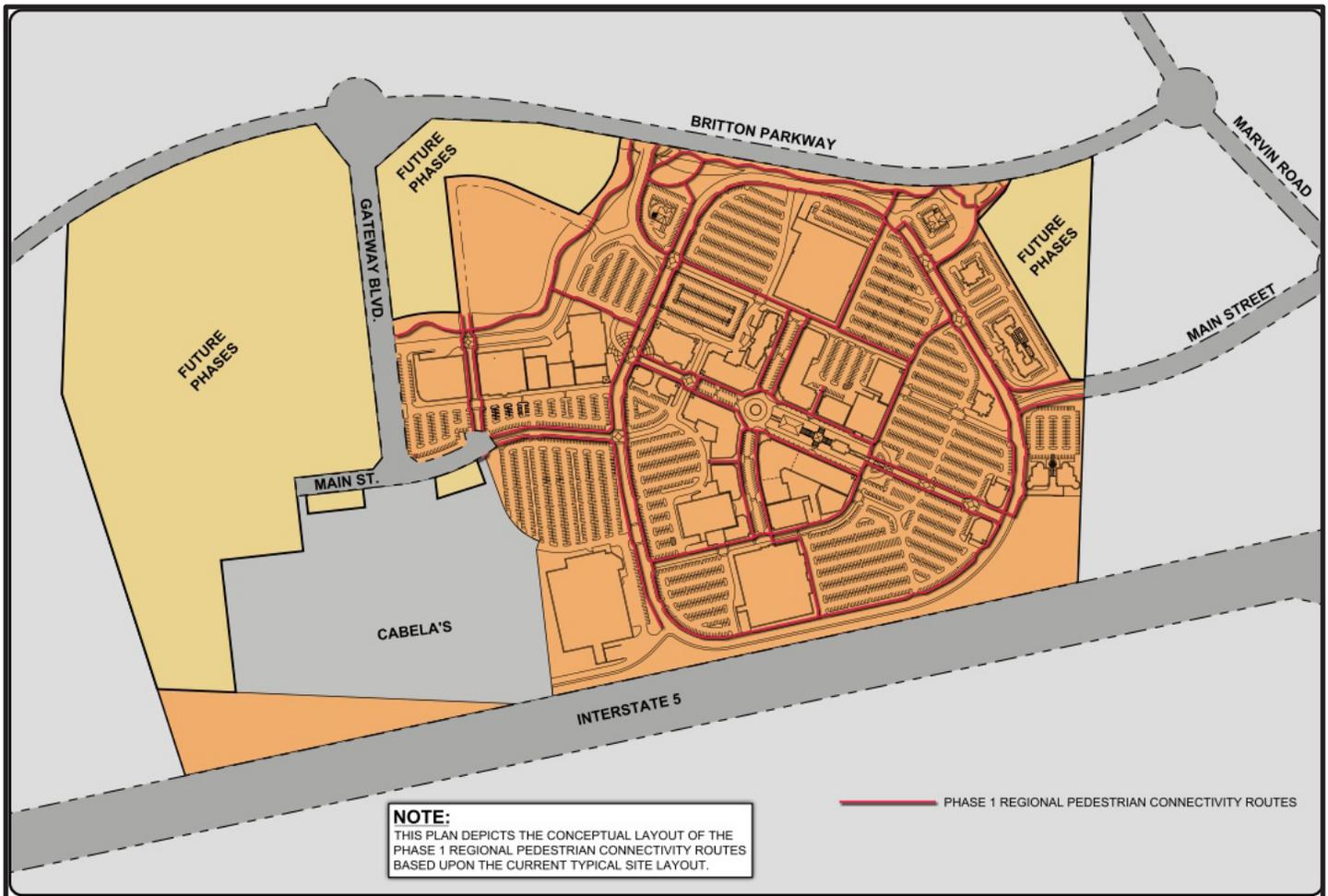


Figure 3.19 - Conceptual pedestrian connectivity plan

element for this type of facility is designated routes which allow transit vehicles direct access to and from the site. Direct and efficient access for transit vehicles is important because it allows transit to operate more efficiently by avoiding commercial and retail traffic.

Mitigation Strategies

Development of the proposed Lacey Gateway Town Center has been anticipated and in the planning process for some time. The City of Lacey has prepared comprehensive and project-specific documents over the past 15 years that address the traffic potential of this and other large-scale developments within the area. While it is expected that the Lacey Gateway Town Center project would have a measurable impact on the City's transportation system, local and regional transportation corridors have been identified to accommodate this significant development as well as other anticipated growth in the area not associated with *Lacey Gateway*. Even with these planned corridors and transportation improvements in place, project-specific impacts would be realized and mitigation measures will be necessary to accommodate the new traffic from the Lacey Gateway Town Center development.

The overall full build out development is proposed to be constructed over a 10 to 30-year period. Phase 1 is expected to be constructed within ten years from when construction is begun. Overall, at full buildout the project will attract approximately 9,000 evening peak hour trips on the local and regional transportation system. Phase 1 is expected to be constructed over a ten-year time frame and will attract approximately 2,875 PM peak hour trips. Given the large scale of this development proposal and the projected timeline to reach the full build-out potential, specific mitigation measures have only been identified for Phase 1 development.

The mitigation measures listed below are categorized into three types of developer contributions and

responsibilities. Each of these types is described briefly below, and the mitigation that follows for the project is organized according to these types:

1. *Developer Funded Off-site Infrastructure Improvements* – Improvements that are required to meet current level of service and concurrency standards if the proposed development creates impacts that affect service levels, safety and/or operational constraints.
2. *Site Access and Circulation Improvements* – Street and intersection improvements to accommodate internal site access and circulation. These requirements often include provisions for future street connections and corridors linking to adjacent developable properties and identified transportation routes listed in the City's comprehensive planning documents.
3. *Traffic Mitigation Fees* – Traffic mitigation fees paid in accordance with applicable City and County policies. If a developer-funded improvement is contained within the project list, it may be eligible for a credit from the mitigation fee.

The following mitigation measures have been identified as necessary to accommodate traffic resulting from the proposed Lacey Gateway Town Center. Mitigation is organized according to the types described above. The identified mitigation is specific to Phase 1.

Developer Funded Off-site Infrastructure Improvements

1. Interstate 5 SB Off-ramp at Marvin Road

The City of Lacey is planning to convert the Marvin Road/Interstate 5 interchange to a Single Point Urban Interchange (SPUI) configuration. The City is also pursuing construction of a slip ramp from the existing southbound off-ramp to Hogum Bay Road. Either improvement would be expected to improve predicted operations at the Marvin Road/I-5 Southbound Ramp intersection. However, if the SPUI or slip ramp is not constructed prior to development of the Lacey Gateway Town Center, the developer of the Lacey Gateway project upon receiving the necessary approvals from the appropriate state and local authorities may construct an improvement at the ramp to accommodate site-generated traffic flows. In this case, the project developer would construct, at their own expense, a second right-turn lane on the southbound off-ramp to Marvin Road. The improvement would require widening a portion of the freeway off-ramp and may require traffic signal modifications.

2. Marvin Road/Main Street Intersection

The project developer will design and construct an additional northbound to westbound left-turn lane at the intersection. The improvement will require adding a third circulating lane on a portion of the roundabout. The improvement will also require widening of Marvin Road on City right-of-way to provide a third northbound through lane between Hogum Bay Road and Main Street.

3. Willamette Drive/Hogum Bay Road

If neither a City constructed modern roundabout or the additional right turn lanes on Hogum Bay Road have been installed prior to development of the Lacey Gateway Town Center, the developer will be required to construct the northbound and southbound right turn lanes on Hogum Bay Road prior to certificate of occupancy of the first building in Lacey Gateway Town Center.

4. Sleater-Kinney Road/15th Avenue NE

If the additional approach lane on 15th Avenue NE has not been constructed prior to development of the Lacey Gateway Town Center, the developer will be required to construct this improvement prior to certificate of occupancy of the first building in Lacey Gateway Town Center.

5. Britton Parkway/Carpenter Road intersection

The developer will construct intersection improvements at this location. Analysis described in the Transportation Analysis indicates that implementation of a traffic signal system would allow an

acceptable level of service through completion of Phase 1 of the Lacey Gateway Town Center. The City of Lacey may prefer a different intersection control option such as a modern roundabout. If a different option is pursued, the developer would contribute the cost of a traffic signal system toward another intersection improvement option that would be built by the City.

6. Carpenter Road/Martin Way

If grant funding of the Carpenter Road corridor project has not been secured to accommodate the future widening of the Carpenter Road corridor prior to development of Phase 1 of the Lacey Gateway Town Center, the developer will be required to construct the intersection improvement prior to Certificate of Occupancy of the first building in Lacey Gateway Town Center.

Site Access and Circulation Improvements

1. The development of the Lacey Gateway Town Center will require construction of a series of internal roadways. The Master Plan will identify a series of roadways and other multi-modal corridors that provide the major access points within the area. These roadways include:
 - Main Street – Off-site, Main Street will intersect Marvin Road east of the development and will provide a primary access into the Gateway Town Center area. Main Street will be an east/west roadway system that provides connectivity to Marvin Road and Gateway Boulevard and to the future phases of the overall master plan. The developer will only be responsible for construction of the roadway within the project boundary.
 - Eastern Parkway – a two/three lane north-south roadway between Britton Parkway and Main Street.
 - Central Parkway – a two/three lane north-south roadway between Britton Parkway and Main Street.
2. In addition to the above described roadways, internal public and/or private local access roadways will be required to provide circulation within the development and to provide access to future phases, adjacent properties, and the collector roadway system. Prior to Site Plan Review approval for Phase 1, an internal circulation plan prepared by a professional licensed Transportation Engineer will be submitted to the City for review and approval. The internal circulation plan will provide design parameters for internal roadways, driveways and intersection channelization meeting engineering standards to suit the specific needs of the individual end users, transit systems and the redevelopment and infill potential of the Phase 1 area. The internal circulation plan will also identify bus stop locations and amenities, and bicycle storage facilities. The circulation plan will be designed to allow for pedestrian mobility and to demonstrate how the above amenities will be accessed by non-motorized traffic in the shortest distance possible. Site-specific access and circulation studies would not be required to re-evaluate off-site roadways and/or intersections outside of the Lacey Gateway Town Center Phase 1 project area. All local roadway design will require the approval of the City of Lacey.
3. The adoption of Marvin and Martin as strategy corridors through an amendment to the Lacey Transportation Plan, or other applicable mitigation proportionate to the identified impact agreed to by the City, will need to occur prior to development of Phase 1. An appropriate mix of strategy corridor mitigation measures to address the LOS at the identified intersections will need to be implemented by the developer prior to Phase 1 development. These measures could include high quality and fully integrated bike, pedestrian, carpool, vanpool, and transit facilities and services; connected street grids; transportation technology measures that improve overall system operating efficiency and safety; access management; parking management; aggressive travel demand management strategies; and or land use intensification.

Traffic Mitigation Fees

1. City of Lacey Traffic Mitigation Fees

The applicant shall pay the City of Lacey traffic mitigation fees. The fees will be based on the net new PM peak hour traffic flows on the area roadways caused by the construction of Lacey Gateway Town Center Phase 1 as shown on Figure 5 in Appendix G. The fees have been estimated for the overall development plan for Phase 1 and will be collected incrementally, at building permit issuance for each building within the development. A cost-per-unit has been established for each of the five separate land-uses identified in the development plan. The fee per unit for each land-use type is shown in the Table 3-23. The fees shown below are representative of the recommended fee structure. Please note that the standard 50% reduction for commercial trips will not be applied because the methodology used in the analysis accounts for diverted trips. However, changes to the development plan or to the City's mitigation fee project list might result in adjustments to the per-unit fees listed below.

Table 3-23 Lacey Gateway Town Center Phase 1 – Traffic Mitigation Fee Estimate per Unit

	Shopping Center	General Office	Residential	Civic	Hotel	Project Total
Total Mitigation Fee per land-use	\$2,535,912.73	\$149,584.72	\$506,981.76	\$36,141.27	\$70,274.70	\$3,323,895.18
Size	1,026	100	500 Residential	30	119	
Units	1,000-sf	1,000-sf	Units	1,000-sf	Rooms	
Traffic Mitigation Fee per Unit	\$2,471.65	\$1,495.85	\$1,013.96	\$1,204.71	\$590.54	
Source: Shea, Carr & Jewel, 2009						

2. Other Traffic Mitigation fees

The applicant will be responsible for fair-share contributions to Thurston County for off-site traffic improvements. Traffic impact fees mitigating impacts to Thurston County Roads in the amount of \$1,434,903 shall be paid to the City of Lacey prior to building permit issuance. The City of Lacey will then forward to Thurston County the collected impact fees.

3.3.3. Public Services

Public services are those systems or organizations needed to protect the general health, safety and welfare of a community. They include fire protection, emergency medical response, police services, and public education.

Existing Conditions

Fire Protection

Lacey Fire District 3 provides service to the Lacey Gateway Town Center area, including fire and rescue response and emergency medical services. Fire District 3 includes an area of approximately 70 square miles in northeast Thurston County between the Nisqually River and the City of Olympia. The District serves the

City of Lacey and unincorporated District areas in Thurston County, and provides back-up response to other areas of the county when the primary units are already assigned to other emergencies.

Station 35, located at 3701 Willamette Drive NE, and Station 34 at 8407 Steilacoom Road SE are the closest stations to Lacey Gateway Town Center. Both stations are approximately 2.5 miles away from the proposed development site and are staffed 24 hours per day. In 2006, Medic 6, a new paramedic unit, was opened at Station 34. The new unit operates 12 hours per day, and provides critical life support services to the Northeast Area of Lacey. Lacey Fire District also recently added a 105-foot aerial ladder truck, which expands the District’s ability to respond to calls such as rescue, roof access, and lighting during night operations at locations with buildings up to ten stories high. In 2006, the District had over 10,000 emergency response incidents, averaging one call every 56 minutes. Station 34 responded to 1,996 calls, and Station 35 responded to 350 calls in 2006. Lacey Fire District has set a performance standard of a 13-minute response 90% of the time for emergency medical services and fire for Station 34. District emergency response calls in 2006 included:

Table 3-24 -2006 Fire District Response Breakdown

Call Type	Number	Percentage
Structural Fires	90	1.2%
Vehicle Fires	45	.5%
Brush/Grass fires	97	1.3%
Motor Vehicle Accidents	622	8%
Advanced Life Support	3,798	47%
Basic Life Support	3,375	42%
Total	8,027	100%

As indicated above, the majority of fire department calls are for medical assistance, which is in large part due to fire prevention practices implemented through building and fire codes and education programs that make fires less frequent.

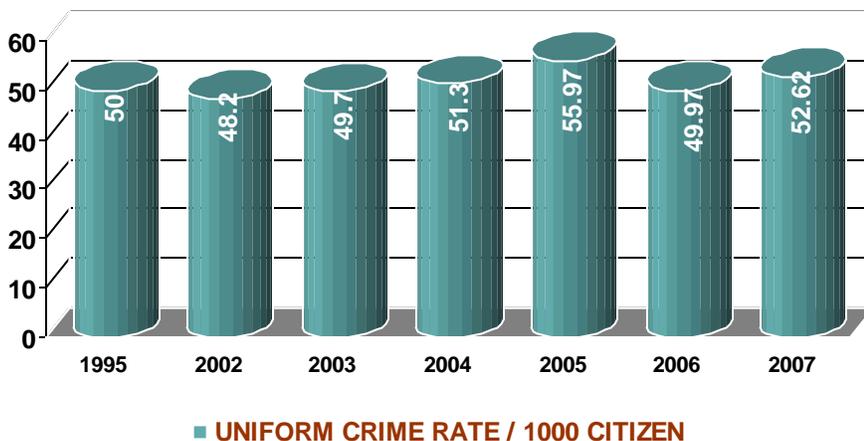


Figure 3.20

Fire protection in the project area has seen a marked improvement over the years. For fire insurance purposes, communities are classified on a scale of 1-10, with 10 indicating no credible fire protection. In late 2006, the City of Lacey was upgraded from a Class 4 to a Class 3 and the rest of the District moved from

a combination class 4 and 8A to a Class 4 throughout the District.

Police Protection

The Lacey Police Department (LPD) provides law enforcement services within the City of Lacey, including investigation of crimes, responding to community issues, crime prevention, traffic control, provision of school resource officers, interlocal drug unit support, registered sex offender tracking, special response team, problem-solving process team, citizen training academies, multi-family housing programs, and planning of community events.

LPD headquarters are located at 420 College Street SE. A 110 square foot substation is located in the Venture Bank building at 8308 Quinault Drive SE, on the south side of I-5 across the freeway from the proposed Lacey Gateway project site. In 2007, the department employed 51 FTE commissioned police officers and six

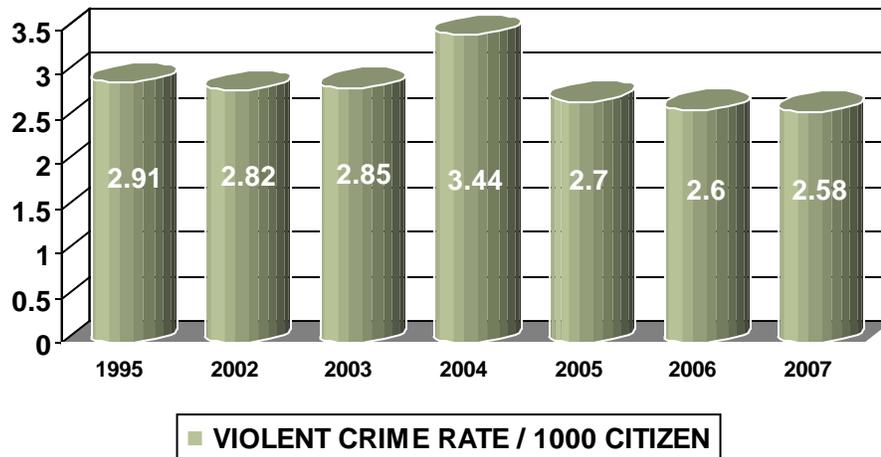


Figure 3.21

Community

Service Officers, and had 28 patrol units and 15 marked patrol vehicles.

The overall crime rate for the City of Lacey was 55.97 per 1000 citizens in 2005, 49.97 in 2006, and is projected to be 52.62 for 2007. The Washington Association of Sheriff's and Police Chiefs (Crime in Washington 2005 Annual Report) reports 55.97 "all crime index offences" per 1,000 people in Lacey, which compares to 61.6 in Olympia, 45.3 in Tumwater, 41.2 for Thurston County as a whole, and 52.9 for the State of Washington. The "all-crime index" does not take into account the varying severity of offences or distinguish between violent crime and property crime.

The Lacey Police Department responded to 39,645 calls for service in 2005, 46,452 calls in 2006, and is projected to respond to 45,040 in 2007. Those calls for service resulted in 7,489 reports being written in 2005, 8,159 reports in 2006, and a projected 9,317 reports in 2007.

In 2005, the LPD made 2,448 arrests. 2,266 arrests were made in 2006, and 3,919 are projected for 2007.

Lacey had a violent crime rate of 2.7 incidents per 1,000 people in 2005. This compares with a rate of 3.46 in Washington and a rate of 4.69 nationally.

Schools

The Lacey Gateway Town Center is located in the North Thurston Public Schools (NTPS) District. NTPS is the largest district in Thurston County, with approximately 13,000 students housed on 20 campuses. Enrollment is expected to increase to 20,000 within the next 15 years. The District currently has 12 elementary schools,

three middle schools, three high schools and a high school of choice for students seeking an alternative high school. Its buildings, playing fields and three swimming pools are open to the community when school is not in session. NTPS provides a wide range of educational programs including gifted education, special education, arts and music education.

The Lacey Gateway site is located within the current school boundaries of Olympic View Elementary, Chinook Middle School and River Ridge High School. Olympic View Elementary has an enrollment of 547 for the 2007-08 school year, and a maximum class size of 24 for grades K-3 and 27 for grades 4-6. Chinook Middle School has 683 students currently enrolled, and a maximum class size of 25. River Ridge High School has a 2007-08 enrollment of 1,127, with a maximum of 27 students in any class.

North Thurston Public Schools policies for school design and planning capacity are as follows:

- Elementary School – 550 + special education
- Middle School – 750 + special education
- High School – 1,250 + special education

The master planned communities in the Northeast Lacey area included sites for a middle school and two elementary schools in Meridian Campus and two elementary schools in the Hawks Prairie Planned Community. To date, no schools have been constructed within either planned community. NTPS currently has one middle school site and one elementary school site in Meridian Campus. One school site in the Hawks Prairie Planned Community is dedicated but not conveyed to NTPS. At present the District expects to build a new elementary school and new middle school every four to five years. Construction generally alternates between elementary and middle schools so that about every two years either a new elementary or middle school is under construction.

A study by the National Association of Home Builders (Multi-family Market Outlook, July 21, 2005) used data from the 2000 Census to confirm that multi-family structures house fewer children than other types of housing. For example, there are typically about 76 school-age children in 100 single family rental households, but only about 34 children in an equal number of multi-family rental households. The 2000 Census data shows that, on average, there are 49 school-aged children in every 100 rental households in metropolitan areas. There are also fewer school-aged children per household in larger apartment buildings. Households in 20+ unit structures typically have only 20 children per 100 units.

Current student population projections for the North Thurston School District indicate that it will need two additional elementary school sites in the Northeast portion of the City of Lacey. The District has been evaluating potential school sites along the Britton Parkway corridor for an elementary school that would serve the proposed project area and surrounds. Elementary school sites are ideally larger than 13 acres in size, but can potentially be reduced to 10 to 13 acres depending on the characteristics of the site and the surrounding land uses. Opportunities to reduce school site sizes arise when there are surrounding land uses that allow for overflow parking during special school events, and when storm water generated on the school site is treated by a regional system instead of on the school property, thereby reducing the amount of land used for these purposes.

Impacts

Fire Protection

The development of commercial, office and residential uses within the Lacey Gateway Town Center Master Plan will create a demand for emergency services. It is expected that trends for emergency response will continue the same pattern as described in Table 3-23 with emergency medical response being the primary demand.

To establish the tone of the Town Center as a gathering place, an open space plaza will be located in Phase 1 where public events and celebrations will occur. The increase of people visiting the town center may

potentially trigger increase in emergency medical service responses. With proper planning and coordination with local emergency services, having medically trained personnel and equipment on site to provide initial response and basic life support could lessen the demand on the local emergency service providers.

With the evolution of fire codes specifying standards according to type of occupancy, construction material, automatic alarm, suppression systems and public education/information, the frequency of fire related calls have lessened over time. As structures are constructed and occupied, the building and fire departments will continue to provide plan review and annual fire inspection services.

Response times from Lacey Fire District #3 Stations 34 and 35 are adequate to serve the needs of the first phase of the Town Center. As the Master Plan is developed to ultimate build-out, demand for fire and emergency services may increase. The Fire District will review each phase of the Master Plan to evaluate the impact and any mitigation that may be needed.

Police Protection

Increased population, employment and additional residential and commercial structures will result in a greater demand for public safety services. Increased traffic volumes may also adversely affect response times for emergency services.

Roadways and Traffic

The impacts to existing police services and response times could be reduced if the area of Phase 1 were patrolled by an on site private security force that could also respond to low level calls for assistance. In addition, placing security cameras in appropriate locations, such as parking lots, plazas, loading bays, etc could reduce vehicle prowls and other minor offenses. The incorporation of a substation for police officers to conduct such tasks as paperwork, stand by, etc would also reduce the amount of time needed for police officers to respond from College Street to Phase 1. A police substation located within the Lacey Gateway project could also serve as a deterrent to crime. A secure police area with parking could be utilized for the crime scene trailer, tactical van and evidence storage. A building footprint of 3,000 square feet would allow for ten parking spaces and approximately 1,000 square feet of evidence storage.

Schools

Impacts on North Thurston Public Schools will depend on the ages of the new population and the available capacity of Olympic View Elementary, Chinook Middle School and River Ridge High School at the time residents start moving into Lacey Gateway. Olympic View Elementary has a current student population of 547, and the District policy is a maximum 550 students.

It is anticipated that characteristics of residents of the proposed multi-family units in the Lacey Gateway would be similar to those in other urban core areas, with a lower number of students than typical residential subdivisions. This is due to the highly urban nature of the proposed development. Due to the low number of school age children anticipated to live within the project area, standard school mitigation fees paid by projects with residential units are anticipated to be sufficient to offset impacts to the schools for Phase 1. As full build-out occurs and increasing numbers of residential units are constructed on-site, additional mitigation such as the conveyance of 10 to 13 acres for an elementary school site may be required.

Mitigation

Phase 1

The following mitigation measures all apply to Phase 1 of Lacey Gateway.

Fire Protection

1. An emergency access and fire suppression plan addressing emergency responses during construction will be developed and submitted to the Lacey Fire Marshal prior to building construction. The emergency access and fire suppression plan will detail access routes into the construction site suitable for emergency

and fire suppression sources (water main/hydrants) capable of delivering adequate fire flow during emergency responses during Phase 1 construction.

2. Minimum fire flows required for commercial and multi-family residential buildings shall be based on fire flows in Table B105.1, IFC Appendix B. Required flows are calculated to 20 psi residual pressure. The City of Lacey Public Works Water Systems Engineer will perform fire flow modeling for each building site as they are applied for to verify if planned and/or constructed water mains will provide the required flow or make recommendations on what necessary modifications are needed to meet fire flow requirements.
3. An emergency response plan will be prepared and submitted to the City that details how emergency services will be planned and coordinated for community events, celebrations, grand openings or similar events.
4. Medical equipment such as defibrillators will be strategically located within Phase 1.
5. Personnel medically trained to respond to basic life support calls, i.e. private security staff, will be provided on site.
6. In addition to the above mitigation measures, the City will apply its adopted development regulations pertaining to emergency and fire response, access, building design, et al., to mitigate potential impacts related to site work and building construction within Phase 1 of the Lacey Gateway Center.

Police Protection

1. Building design, landscape and open space plans will incorporate Crime Prevention through Environmental Design (CPTED) strategies to promote a safe and friendly environment.
2. A security plan will be developed prior to implementation of Phase 1 that will provide for a private security company to patrol, monitor and provide basic assistance, automated security cameras throughout the center and parking areas and a security office strategically located for patrons to access.
3. A police sub-station will be provided within the Lacey Gateway project. The substation will be centrally located in Phase 1 with a "storefront" presence and could be co-located with private security offices. The sub-station will require a secure area to house law-enforcement offices for the performance of duties necessary by members of the crime prevention unit, traffic and detective units, and storage facilities for equipment that reduce time spent away from the Gateway area.

Schools

1. Prior to issuance of building permits for projects containing residential units, the applicant shall complete a voluntary mitigation agreement with the North Thurston Public Schools. School mitigation fees contained within the agreement shall be those currently in effect at the time the voluntary mitigation agreement is completed and based on an average student ratio per household applicable to the proposed residential units within Phase 1.

Build-out

The following mitigation measures apply to build-out only of Lacey Gateway.

Fire Protection

1. The environmental review of the build-out scenario will determine if additional mitigation is needed to address any identified impacts.

Police Protection

1. The environmental review of the build-out scenario will determine if additional mitigation is needed to mitigate any identified potential impacts.

Schools

1. The associated comprehensive plan amendment and environmental review of the build-out scenario will determine the level of impact the potential additional residential units will have on the facilities of North Thurston Public Schools. All identified impacts to the public school system will be mitigated.

Significant Unavoidable Adverse Impacts:

No significant unavoidable adverse impacts to the transportation, fire protection, emergency services, police protection or schools are expected to result from the Lacey Gateway project.

3.3.4 Utilities

Existing Conditions

Water System

The City of Lacey water utility serves the area. The City uses 19 wells to draw water from three underground aquifers. Additional water is periodically purchased from Olympia's water system.

Existing infrastructure in the area include a 16-inch water main in Britton Parkway and a 16-inch water main that was installed to serve Cabela's along Gateway Boulevard. These systems are recent construction and, therefore, will not require any modification to serve the Lacey Gateway development.

Existing water capacity and pressure is good. Current Department of Health regulations require that water systems maintain a minimum pressure throughout their distribution systems of 30 psi during peak hourly demand and 20 psi during a fire event at maximum daily demand.

Sewer System

The sanitary sewer system serving the project area is owned by the City of Lacey. According to an agreement between the cities of Lacey, Olympia, Tumwater and Thurston County (LOTT), wastewater is currently treated at the regional plant located in Olympia and the satellite treatment facility on Martin Way in Lacey. LOTT is currently producing class A reclaimed water at the Martin Way Reclaimed Water Plant from wastewater generated in Lacey. LOTT conducts periodic independent studies to ensure that treatment capacity is sufficient to meet future needs.

Wastewater produced within the City is collected in a network of small diameter gravity sewer or STEP lines and flows towards a network of lift stations that serve each sewer drainage basin. It is then pumped through a force main either into an adjacent basin, directly to another lift station, or to the main LOTT interceptor located along Martin Way from Marvin Road to LOTT's regional lift station. The conveyance system currently consists of 34 lift stations and several STEP collection systems.

A large regional lift station will ultimately be required to convey wastewater from properties in the west portion of the Hawks Prairie Business District zoning classification, including a large regional pumping facility. The proposed regional lift station will be located north of Britton Parkway, east of Carpenter Road, and will be necessary to serve Phase 1 development of Lacey Gateway.

Electricity

The electrical distribution system in the Hawks Prairie area is owned by Puget Sound Energy (PSE). PSE estimates that Phase 1 of Lacey Gateway will demand an additional 8,461 kilowatts (kW) and 16,995 in future phases. Meeting this demand will require installation of additional feeder circuits and a new substation to serve Lacey Gateway.

Natural Gas

Puget Sound Energy is the provider of natural gas to the Lacey Gateway project. A gas main was installed in Britton Parkway and Gateway Boulevard with the construction of Cabela's.

Impacts

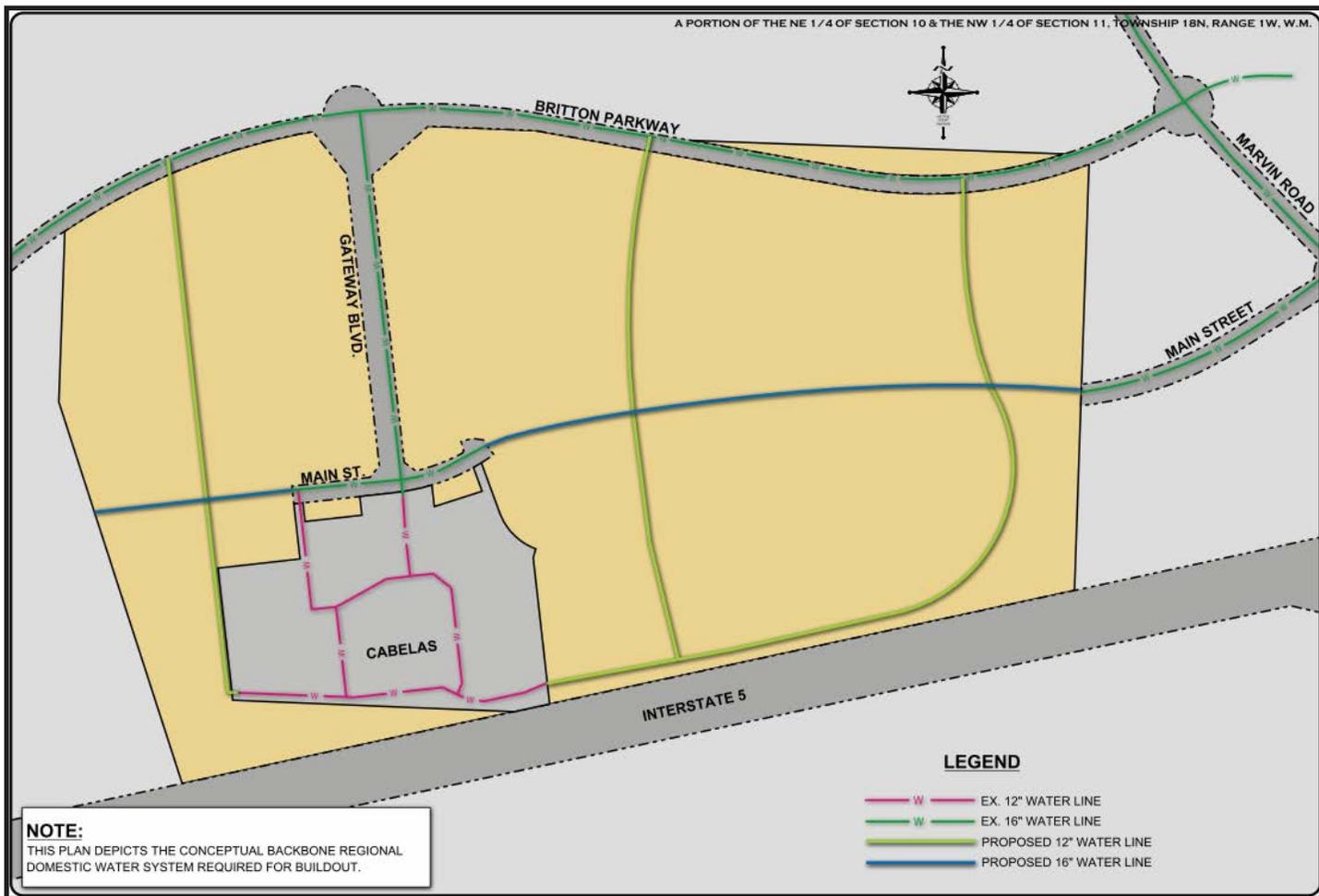


Figure 3.22 - Conceptual water utility plan

Water

The proposed Lacey Gateway Town Center will have a substantial demand for potable water. The City of Lacey has committed to provide 227,300 gallons per day to serve approximately 1,000,000 square feet of development and 500 residential units. Development of future phases will be dependent upon the City obtaining sufficient water rights to serve the project.

The following table lists the estimated volume of water consumption by land uses proposed in the Lacey Gateway project.

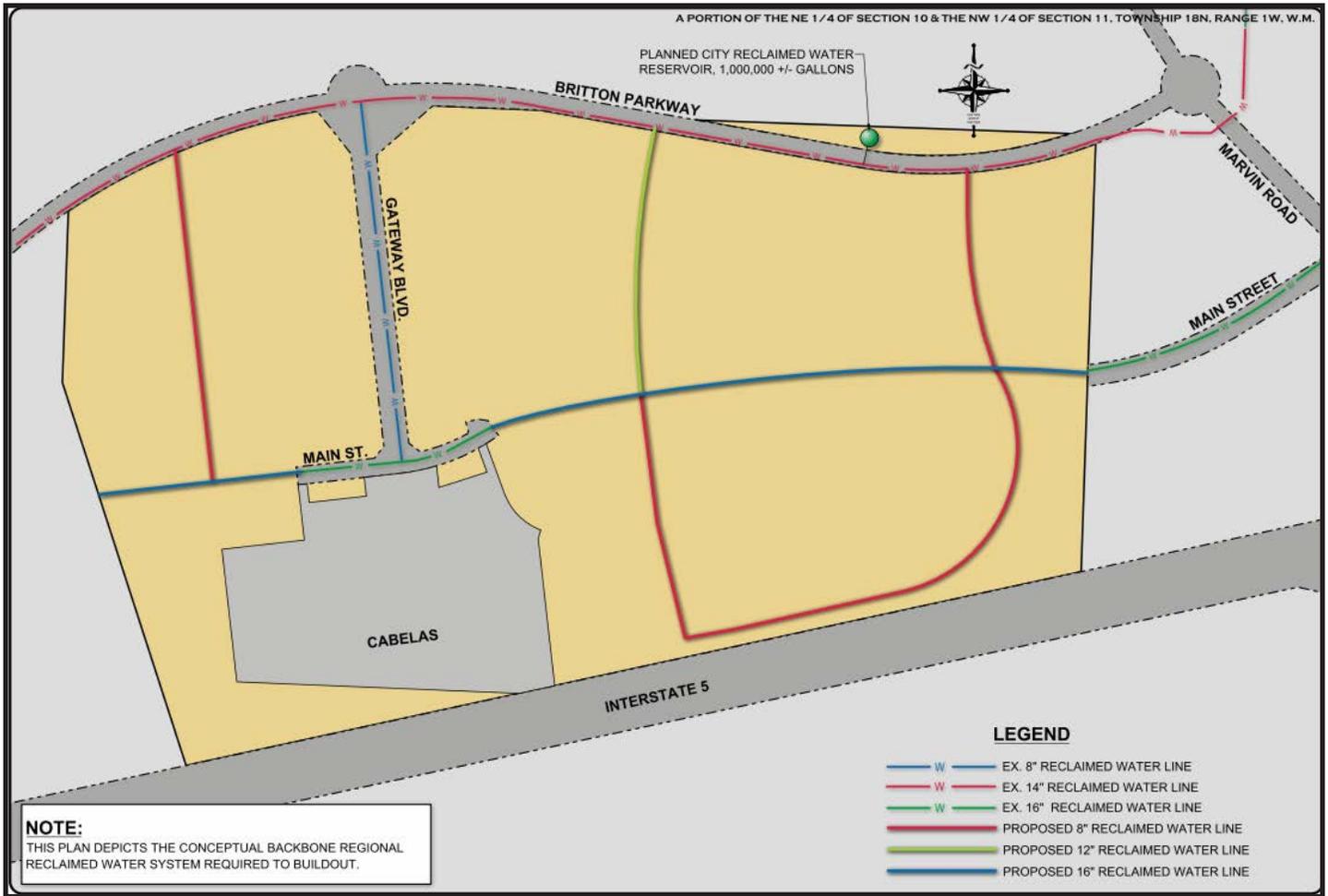


Figure 3.23 - Conceptual reclaimed water utility plan

Table 3-25 - Water Consumption Rates

Land Use	Unit of Measurement	Gallons Per Day/Unit
Retail	1,000 square feet	20
Restaurant	Seat	50
Office	1,000 square feet	50
Multi-family Housing	Dwelling unit	200
Hotel	Room	50
Cinema	Seat	5
Civic uses	1,000 square feet	50
Health	1,000 square feet	100

The estimated water use for types of uses proposed in the Lacey Gateway project is shown in the table below, broken down by phase.

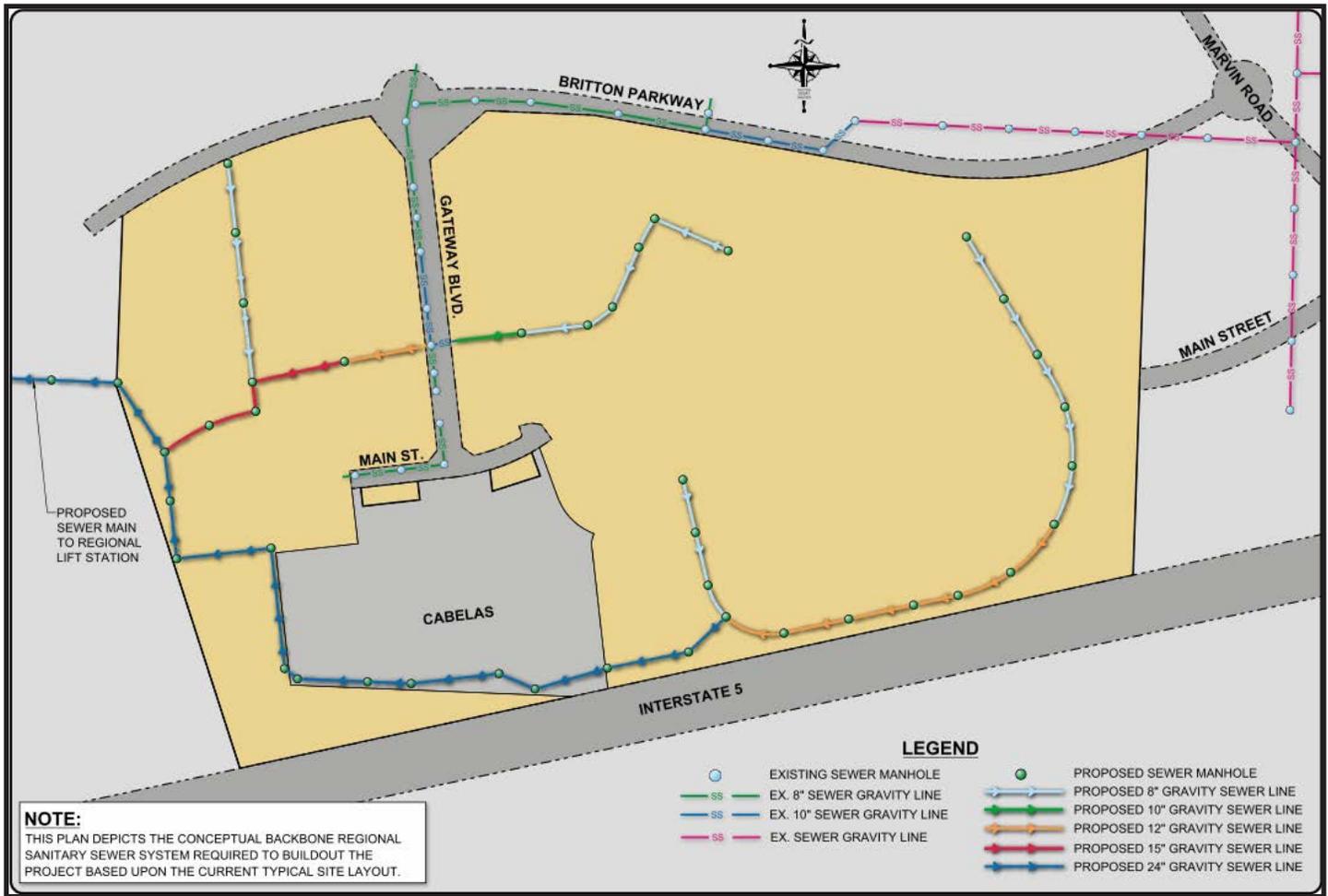


Figure 3.24 - Conceptual sewer plan

Table 3-26 - Lacey Gateway Estimated Water Use (gallons per day)

	Phase 1	Future Phases	Total
Retail	16,860	21,700	38,560
Restaurants	100,000	25,000	125,000
Office	5,000	45,000	50,000
Multi-family	100,000	400,000	500,000
Hotel	13,500	18,750	32,250
Civic uses	1,500	2,500	4,000
Cinema	8,000	0	8,000
Health	4,000	0	4,000
Total (gpd)	248,860	512,950	761,810

*Source: Hatton Godat Pantier, January, 2009.

The City of Lacey has agreed to guarantee 227,300 gallons per day of water to serve the 1,000,000 square feet of retail/commercial/office buildings and 500 apartment, condominium or townhouse residential units in

Phase 1 of the Lacey Gateway development, provided that the project use reclaimed water (“purple pipe”) for its landscape irrigation and toilet flushing in commercial buildings.

Proposed Water System

The proposed water system for the Lacey Gateway development will supply potable water and fire flow for the entire project. The project is proposed to be constructed in multiple phases. A computer-modeled fire flow analysis was performed by the City of Lacey to verify pipe sizes and available fire flow for the project at specified locations throughout the site. The results of this analysis show that the backbone system (as shown on the attached Domestic Water Exhibit) is expected to provide adequate pressure to serve the site.

The regional backbone water system consisting of 12-inch and 16-inch water mains is expected to provide adequate fire flow to any portion of Phase I as it is constructed. The backbone system includes construction of the watermain down Gateway Boulevard (already constructed) and also an east-west watermain connecting Main Street at Gateway Boulevard to the Main Street extension to the east (portions already constructed). The east-west connector has two other loops that will connect to the watermain in Britton Parkway at the Central and Eastern Parkway intersections. Installation of this backbone system is expected to allow any portion of each phase to be constructed with fire flow protection. Looping of the water system is expected as blocks get built-out. This looping will increase water quantity and fire flow availability.

At full build-out, the 16 inch main trunk line will extend from Main Street at Gateway Boulevard to the western property boundary and one more additional 12-inch loop will connect the 16-inch main to the existing main running along the south side of the Cabela’s Property. A total of four water main connections will tie the on-site system out to the main line in Britton Parkway.

Sewer

There will be an increased demand for sewer services to serve the Lacey Gateway. The City of Lacey has agreed to construct the regional sewer system identified by the Wastewater Comprehensive Plan to serve the Hawks Prairie Business District and other North Lacey properties. The intent is to start construction of the initial stage of the system lift station by the summer of 2010.

New conveyance facilities will be required in undeveloped areas to adequately serve future wastewater customers. Portions of the wastewater system that will serve the proposed Gateway project will be constructed by the City and portions will be constructed by the project proponent. The City intends to construct specific public improvements to serve the planned Lacey Gateway site, including a regional lift station. Sewer lines to serve each development site will be installed in trenches under the right-of-way and will be paid for by the developer. The wastewater system for the Lacey Gateway project, including the lift station, will be maintained by the City of Lacey. Construction of the system is anticipated to occur in multiple phases. The first phase, a sanitary sewer conveyance along Gateway Boulevard and Main Street, was installed with the construction of Cabela’s.

The proposed lift station that will serve the Gateway project is located northwest of the project site, approximately one mile north of I-5, east of Carpenter Road and north of Britton Parkway. The sanitary sewerage will be pumped from the proposed lift station to the downstream gravity sewer tie-in located at Carpenter Road. The existing line is adequately sized for immediate future needs, but will need to be upsized as build-out occurs. The regional lift station will likely be constructed in up to three phases, as development occurs and additional capacity is needed to serve the area.

As a part of the Cabela’s construction 8- and 10-inch sewer mains were installed along Gateway Boulevard. This is an inactive line that was installed to serve the future Lacey Gateway Development. Cabela’s is currently using a small commercial lift station system connected to the City for sewage waste disposal. This

system will be abandoned and the store connected to the sewer system once it is built and operational.

Proposed Sewer System

The proposed sewer system will be phased but, because the project will be served by a gravity system, much of the piping will require installation in the first phase of the project. The proposed connection out to the regional lift station is on the western boundary of the project. This design will require that the main trunk lines connecting the east portions of Phase 1 to this line must be installed in Phase 1. The phased construction of the project will therefore require construction of roads and infrastructure outside phase boundaries. Sewer main lines vary in size from a minimum of 8 inches to a maximum of 24 inches and will be installed beneath all proposed roadways.

Future phases will expand the system with additional lines of 8 inch to 10 inch diameter pipe.

All proposed piping for all phases have slopes that exceed the minimum required for the pipe size. All proposed sewer pipes are gravity lines. Manhole depths will vary from a minimum of 5 feet to a maximum of 26 feet, unless specifically approved by the Public Works Director.

Electricity

There will be an increased demand for electricity to serve the high density of development proposed in the Gateway Master Plan. As development occurs in the Lacey Gateway area, improvements to PSE's electrical system will be required in order to adequately provide electrical service. As Main Street, Central Street and other roadways are constructed, installation of conduits, vaults, cables and street crossing conduits will be necessary.

PSE has estimated the demand for electricity to be 8,461 kW with development of Phase 1 and 16,995 kW in Future Phases. In order to meet the electrical load demands of Future Phases of development, PSE will need to construct a power substation in close proximity to Lacey Gateway the year before electrical loads reach approximately 9-11 MWs. Planning for this facility is currently underway. A new 115,000 volt transmission line will be routed from the intersection of Sleater-Kinney Road and 26th Avenue NE to this new substation site. The transmission line will then be continued to a point near the intersection of Steilacoom Road and Pacific Avenue SE to provide two transmission sources to the new substation. At full build of the project, the demand for electricity is estimated at 26,566 kW. The construction of the new transmission lines and substation will assure the needed electrical service will be available.

The following table illustrates the projected electricity demand of the Lacey Gateway project.

Table 3-27 – Projected Electricity Demand

Building Type	Phase 1		Future Phases	
	Sq Ft	Est KW	Sq Ft	Est KW
Office	100,000	700	900,000	6,300
Retail	899,000	5,329	769,000	4,559
Hotel	87,000	566	121,000	787
Residential	625,000	1,250	2,500,000	5,000
Cinema	44,000	255.2		
Health & Fitness	40,000	232		
Civic	30,000	129	50,000	350
Total in Each Phase		8,461		16,995
Accumulated Load (kW) ⁽¹⁾		9,571		26,566

(1) Total includes Cabela's demand.

Source: Puget Sound Energy

Natural Gas

There will be an increased demand for natural gas to serve the increased density and intensity of development proposed in the Gateway Master Plan. An average house uses about 1,000 therms of natural gas per year. One therm is approximately 100 cubic feet of natural gas. PSE estimates natural gas usage for retail at 75 cubic feet per square foot per year, and for office at 85 cubic feet per square foot per year. The following table shows the projected natural gas demand in each phase:

Table 3-28 – Projected Natural Gas Demand

Building Type	Phase 1		Future Phases	
	1000 Sq Ft	Therms (1000)	1000 Sq Ft	Therms (1000)
Office	100	8,500	900	76,500
Retail	899	67,426	769	57,676
Hotel	87	6,525	121	9,075
Residential	625	62,500	2,500	250,000
Cinema	44	3,300		
Health & Fitness	40	3,000		
Civic	30	2,623	50	3,750
Total in Each Phase		153,873		397,001
Accumulated Load (1,000 Therms) <small>(1)</small>		167,748		564,749

⁽¹⁾ Total Includes demand for Cabela's.
Source: Puget Sound Energy

Mitigation Measures

Phase 1

The following mitigation measures all apply to Phase 1 of Lacey Gateway.

Water

1. A primary water main(s) 16 inch in diameter will be extended off of the existing main located in Gateway Boulevard and extended to the eastern property line. It will be constructed with the initial stages of Phase 1 construction. A secondary connection will be made either to the existing main in Marvin Road (via Main St. extended from Marvin) or to the existing main in Britton Parkway (Eastern/Britton Intersection) to provide a looped system for providing adequate fire flow during initial building construction. As the remainder of Phase 1 is developed, the internal water system will be systematically constructed off of the primary water main.
2. Water availability for Phase 1 is limited to 227,300 gallons per day to serve approximately the 500 residential units and 1,000,000 square feet of retail/commercial/office buildings provided that Lacey Gateway Development uses reclaimed water ("purple pipe") throughout the development for its landscape irrigation and for internal flushing within commercial buildings.
3. The proponent will coordinate with City of Lacey Public Works to secure additional water availability beyond the 227,300 gpd allocated for Phase 1.
4. Alternately, the first 500,000 square feet of commercial office buildings may be built without the use of internal purple pipe if only 250 apartment, condominium or townhouse style residential units are constructed at the time of the first 500,000 square feet of commercial/office buildings. Water availability and conditions of availability will be as agreed to in the Memorandum of Understanding for the project.
5. In addition to the above mitigation measures, the City will apply its adopted development regulations pertaining to water system improvements to mitigate potential impacts associated with water line construction and extension of water services.

Sewer

1. A regional sewer lift station and associated gravity line to the station and force main line providing connection from the station to the existing Martin Way pump station will be on line prior to the occupancy of the first building constructed within Phase 1 of Lacey Gateway to provide adequate sewer service.
2. A primary sewer main running along the southerly and westerly boundary of the Lacey Gateway property, connecting to the terminus of the off-site sewer main, will be constructed during the initial stages of Phase 1. As the remainder of Phase 1 is developed, the internal sewer system will be systematically constructed off the primary sewer main.
3. In addition to the above mitigation measures, the City will apply its adopted development regulations pertaining to sewer system improvements to mitigate potential impacts associated with sanitary sewer line construction and extension of sanitary sewer services.

Electricity and Natural Gas

1. The proponent will coordinate with Puget Sound Energy (PSE) to assure adequate natural gas and electrical facilities are in place and available.
2. An additional Hawks Prairie feeder circuit from the east of the site shall be installed prior to the end of Phase 1.
3. Pleasant Glade circuit shall be extended from the west of the site along Britton Parkway NE prior to the end of Phase 1.

Build-out

The following mitigation measures apply to build-out only of Lacey Gateway:

Water

1. The Lacey Gateway Development shall use reclaimed water ("purple pipe") throughout the development

for landscape irrigation and for toilet flushing within commercial buildings. If reclaimed water is not available at the time of future phase development, purple pipe will be installed at the time of development in a manner that will allow the ability to switch over to the reclaimed water source at the time it is available.

2. The proponent shall provide, as part of the environmental review associated with each phase under the build-out scenario, water demand analysis indicating the water demand of the proposed development, capacity of the public water system and applicable system improvements to mitigate any identified impacts. The study shall be prepared by a water system specialist.

Sewer

No probable adverse impacts to the sewer system applicable to build-out were identified.

Electricity and Natural Gas

1. The proponent shall coordinate with PSE to assure adequate facilities for electricity and natural gas are available. If a project requires new facilities in advance of PSE's plans to construct them, the proponent must provide financial support or construct the facilities to assure they are completed in time to support the development.
2. A new electrical substation shall be energized and feeder circuits installed to meet demand expected from future phases.

Significant Unavoidable Adverse Impacts

There are no unavoidable significant adverse impacts to Utilities anticipated to occur as a result of the proposed project.

3.3.5. Noise

Noise is defined as unwanted sound. It includes population-related noise, such as noise from stereos, lawnmowers, conversations and other activities associated with residential activity. Traffic-related noise levels depend on location of roads and freeways, traffic volumes, average speed, vehicle mix, grade and distance to noise sensitive activities. Construction activity also creates noise sources that will cease upon completion of a project. This section evaluates the impacts of noise on the Lacey Gateway Town Center and the properties adjacent to the site that would potentially be affected by noise from the proposed development.

Sound pressure is generally measured as a level on a logarithmic decibel (Db) scale. Decibels provide a relative measure of sound intensity. The unit is based on powers of 10 to give a manageable range of numbers to the wide range of sound audible to the human ear. An increase of 3 Db represents a doubling of sound energy. A-weighted decibels (dBA) express the relative loudness of sounds in air as perceived by the human ear. In the A-weighted system, the decibel values of sounds at low frequencies are reduced because the human ear is less sensitive at low audio frequencies than at high audio frequencies. The quietest sounds that humans can hear have a sound pressure level of 0 dBA, and prolonged exposure to sound pressure levels exceeding 85 dBA can permanently damage the ear. Sound levels in excess of 130 dBA are more than the human ear can safely withstand. Sound levels of some typical noise sources are shown in Table 3-29 below.

Table 3-29 - Sound Levels of Typical Noise Sources

Noise Source	Sound Level (dBA)
Quiet rustling leaves, calm human breathing	10
Very calm room	20-30
Normal talking	40-60
TV set, typical home level	60
Moving passenger car, 100 feet	60-80
Traffic noise on major road, 100 feet	80-90
Hearing damage from long-term exposure	85
Jack hammer, 100 feet	100
Jet engine	110-140
<u>Human threshold of pain</u>	<u>134</u>

Many regulatory agencies use the equivalent sound level (Leq) to evaluate noise impacts. The equivalent sound level is the level of a constant sound that has the same sound energy as the actual fluctuating sound. When referring to sound levels, it is important to identify the time period being considered. Leq (24), for example, is the equivalent sound level for a 24-hour period. The day-night sound level (Ldn) is similar to a Leq (24), except that the calculation involves adding 10dBA to sound levels measured between 10 p.m. and 7 a.m. to account for potential sleep interference. This relates specifically to residential sensitive receptors.

Federal Highway Administration and Washington State Department of Transportation Noise Limits

The Federal Highway Administration (FHWA) has adopted noise standards that apply to traffic noise associated with its projects. These standards are intended for use along roads controlled by state or federal agencies that are being structurally altered by a project or action, and do not apply to the Lacey Gateway Town Center. FHWA noise limits and implementation of these rules is discussed here to provide a perspective on traffic-related noise levels.

The FHWA identified noise criteria and established procedures for evaluating road improvement projects, which are now codified in federal rules: 23 CFR 772. The FHWA defines a traffic noise impact as a predicted traffic noise level approaching or exceeding the noise abatement criteria shown in the table below, or when the predicted traffic noise levels substantially exceed the existing noise levels. The Washington State Department of Transportation (WSDOT) defines “approaching” the FHWA limits as sound levels within 1 dBA of the criterion level. WSDOT defines “substantially exceeding” existing noise levels as an increase of 10 dBA or more if the calculated future sound level is greater than 50 dBA.

Table 3-30 - FHWA Roadway Noise Abatement Criteria

<u>Land Use Category</u>	<u>Hourly Leq (dBA)</u>
(A) Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.	57 (exterior)
(B) Picnic areas, recreation areas, playgrounds, active sports areas, parks, residences, motels, hotels, schools, churches, libraries and hospitals	67 (exterior)
(C) Developed lands, properties, or activities not included in the above categories.	72 (exterior)
(D) Undeveloped lands	----
(E) Residences, motels, hotels, public meeting rooms, schools, churches, libraries, hospitals, and auditoriums.	52 (interior)

Source: Federal noise rules in 23 CFR 772

Washington State Noise Rule

The state noise code establishes limits on the levels and durations of noise crossing property boundaries. Allowable maximum sound levels are based on the Environmental Designation for Noise Abatement (EDNA) of the source and receiving properties. EDNA categories include residential, commercial and industrial zones. The most stringent limits apply to sounds received in residential districts, and the daytime limits in residential areas are reduced 10 dBA during nighttime hours.

The State noise rule allows the limits in Table 3-31 below to be exceeded for certain brief periods of time during any one hour without violating the limits. Although the State noise rule does not employ an hourly Leq as the basis of the noise limits, the base level, in conjunction with the allowed short-term increases, equate to an hourly Leq about 2 dBA higher than the noise limits listed in the table. Therefore, for a residential source affecting a residential receiver, the daytime limit is approximately 57 dBA hourly Leq, and the nighttime limit is about 47 dBA Leq(1).

Table 3-31 - Washington State Maximum Permissible Environmental Noise Levels (dBA)

EDNA of Noise Source	EDNA of Receiving Property		
	(A) Residential (Day/Night)	(B) Commercial	(C) Industrial
(A) Residential	55/45	57	60
(B) Commercial	57/47	60	65
(C) Industrial	60/50	65	70

The 10 dBA nighttime reduction applies between 10 p.m. and 7 a.m.

Source: WAC 173-60-040

Existing Conditions

The Lacey Gateway Town Center site is undeveloped and major sources of noise are off-site. Traffic is the primary source of noise, since the site is adjacent to I-5 and Marvin Road. Artillery firing from Fort Lewis also is a contributor of noise to the area.

Sensitive receptors to noise include residential areas, hospitals, and parks, where having quiet environments are important. Most of the development proposed within the project is not considered to be a sensitive noise receptor. Residential units and hotels are the uses most sensitive to noise within the project.

Impacts

The increased residential densities and compact development of Lacey Gateway Town Center will locate more people near noise sources in the mixed-use center than would be the case under more dispersed development patterns. Increased population, traffic volumes, construction activity and employment activities will generate additional noise. Given the proximity of the significant noise source of Interstate 5, noise impacts resulting from the proposed project are not anticipated to be noticeable.

Phase 1 Impacts

The predominant noise impacts of the project will result from traffic on site access roads and short-term construction activity. Major new roadways will be needed to carry traffic into the site, causing unavoidable temporary impacts from construction equipment associated with road construction. As the vacant property develops, the site and adjacent properties will be impacted by the increased population and noise typical of urban uses. Residential units and hotels within the area are proposed within the core of the development, at a distance anticipated to be sufficient to avoid noise impacts of I-5.

Long Term Impacts

Noise from the increased population and vehicles on site will be the primary cause of increased noise levels on the site in the long term.

Mitigation Measures

The Lacey Municipal Code prohibits outside construction activities between 9:00 p.m. and 7:00 a.m. in residential zones or areas directly abutting a residential zone. Loud noise from any source in a residentially zoned property that causes disruption of the peace and comfort of the occupants is classified a misdemeanor.

Phase 1 and Build-out

1. Construction of the mixed-use residential properties shall incorporate acoustics, including double pane windows, insulation and architectural strategies to reduce street noise for residents. The materials and methods that are used for reducing the interior noise levels must be coordinated with the City of Lacey during permitting for those buildings.
2. Organization of land uses, with residential properties located a distance from I-5, will reduce the impact of traffic noise on residential properties. An additional noise study will be required if sensitive receivers are located within 200 feet of I-5.
3. As the Master Plan is being implemented, there will be occupied housing units within Phase 1 or build-out that will be subject to construction noise as development occurs within the phases. A noise reduction plan will be developed to reduce the impact to occupied residential units within the development as construction occurs. The noise reduction program will incorporate the following:
 - a. Construction equipment and vehicles shall be equipped with properly sized and maintained mufflers, engine intake silencers, and/or engine enclosures.
 - b. Construction vehicles shall not be allowed to idle for long periods.
 - c. Stationary equipment should be placed as far away from sensitive receiving locations as possible.
 - d. Construction status updates will be provided to residents living within the Lacey Gateway Development to provide notice of upcoming construction activities.
4. A noise study shall be required for each parking garage proposed on site and appropriate mitigation measures will be required.
5. In addition to the above mitigation measures, the City will apply its adopted development regulations pertaining to noise and disturbance issues to mitigate impacts associated with the development of Phase 1 and build-out scenario.

Significant Unavoidable Adverse Impacts

Unavoidable impacts will result from traffic noise, however, with mitigation measures these impacts can be reduced to reasonable sound levels. Much of the future traffic noise will be due to general growth of the area, and not due solely to Lacey Gateway Town Center.

**Lacey Gateway
Planned Action Final
SEIS**

**Comments
and
Responses**

*When changes have been made to the FSEIS in response to comments received, a note has been added in **bolded italics** after the corresponding staff response indicating the page on which the change was made.*



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

July 16, 2009

Mr. Rick Walk
City of Lacey
Community Development Department
PO Box 3400
Lacey, WA 98509-3400



Your address
is in the
Deschutes
watershed

Dear Mr. Walk:

Thank you for the opportunity to comment on the draft supplemental environmental impact statement for the Lacey Gateway Town Center project (Project No.: 07-219) located to the north of Interstate 5, south of Britton Parkway & east of Gateway Boulevard. The Department of Ecology (Ecology) reviewed the information provided and has the following comment(s):

SEPA REGIONAL PROJECT LEAD: Sarah Lukas (360) 407-7459

Shorelands/Wetlands: The proposed mix-use development identifies impacts to several small wetlands. Although these waters of the state may not be regulated by the City of Lacey due to the small size of these waterbodies, all wetlands are regulated by Ecology and the proposed placement of fill will require further permitting.

1

The submitted wetland description identifies all six wetlands as isolated waterbodies, if it has not been completed already, the applicant should substantiate this claim by requesting a Jurisdictional Determination (JD) from the U.S. Army Corps of Engineers (Corps). The Corps is the only agency with the regulatory authority to classify a wetland as an isolated waterbody, and this is the first step to receiving authorization from Ecology to fill an isolated wetland. Ms. Pam Sanguinetti, Project Manager at the Corps, can be reached at (206) 764-6904. I recommend the applicant contact the Corps to request a JD at the earliest time possible and to identify any requirements needed to complete the JD. JDs are usually valid for five years.

2

The 'relocation' of wetlands will require compensatory mitigation approved by Ecology to receive authorization to place fill in these waters of the state. Ecology recommends collaboration in the early stages of the planning process to streamline the mitigation requirements. Advanced mitigation for all phases of the project can be mitigated concurrently and Ecology has found this is the most ecologically beneficial and succinct permitting process requiring only one permit for all phases of impacts.

3

If the applicant has questions regarding the permitting process please contact Alex Callender, Wetland Specialist at Ecology at (360) 407-6167, or by email at acal461@ecy.wa.gov.

SOLID WASTE & FINANCIAL ASSISTANCE: Anya Caudill (360) 407-6084

If the applicant has not done so already, please refer to the techniques referenced in the LEED® (Leadership in Energy and Environmental Design) for Neighborhood Development rating system.

4

The LEED checklist can be an effective design guide for environmentally responsible, sustainable development. For assistance and additional information on incorporating sustainable practices in the design guidelines, please contact Anya Caudill at the phone number given above.

TOXICS CLEANUP: Laura Klasner (360) 407-6265

This area may have been contaminated with **lead and arsenic** due to the smokestack plume originating from the Old Asarco Smelter in north Tacoma (http://www.ecy.wa.gov/programs/tcp/sites/tacoma_smelter/ts_hp.htm). Ecology recommends that the soils be sampled and analyzed for lead and arsenic. If these contaminants and/or others are found at concentrations above the Model Toxics Control Act (MTCA) cleanup levels, Ecology recommends that current owners, potential buyers, construction workers, and others be notified of their occurrence and that you contact the Environmental Report Tracking System Coordinator at the Southwest Regional Office at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Laura Klasner with the Toxics Cleanup Program at the Southwest Regional Office at the phone given above.

5

WATER QUALITY: Roberta Woods (360) 407-6269

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or storm drains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Proper disposal of construction debris must be on land in such a manner that debris cannot enter the waters of the state and buffers or cause water quality degradation of state waters.

After completion of this project, there is likelihood that stormwater runoff will contain increased levels of grease, oils, sediment, and other debris. It is recommended that stormwater treatment devices be installed so that any discharge will be appropriately treated to remove these substances.

6

During construction, all releases of oils, hydraulic fluids, fuels, other petroleum products, paints, solvents, and other deleterious materials must be contained and removed in a manner that will prevent their discharge to waters and soils of the state. The cleanup of spills should take precedence over other work on the site.

The SEPA Checklist mentions that water will be used for dust control. If water is used to control dust impacts during construction, care must be taken to ensure that the watering does not cause erosion and offsite discharge of silt-laden water. Dust control activities which use water and cause discharge of turbid water to storm drains, surface waters, ground water, or the ground are in violation of RCW 90.48, *Water Pollution Control*, and WAC 173-201A, *Water Quality Standards for Surface Waters of the State of Washington*. The discharges may be subject to enforcement action. Information about dust suppression techniques can be found in Ecology's Publication #96-433 "Techniques for Dust Prevention and Suppression." The internet link given below leads to Ecology's website which provides information about dust suppression options:
<http://www.ecy.wa.gov/pubs/96433.pdf>.

Ecology's *Stormwater Management Manual for Western Washington (2001)* contains a list of suggested Best Management Practices (BMPs) for dust control on sites of disturbed land. See Volume IV, Source Control BMPs, page 2-16.

Soil in stockpiles should be stabilized or protected with sediment-trapping measures to prevent soil loss. All exposed areas of final grade or areas that are not scheduled for work, whether at final grade or otherwise, shall not remain exposed and un-worked for more than two days, between October 1 and April 30. Between May 1 and September 30, no soils shall remain exposed and un-worked for more than seven (7) days.

Clearing limits and/or any easements or required buffers should be identified and marked in the field, prior to the start of any clearing, grading, or construction. Some suggested methods are staking and flagging or high visibility fencing.

A permanent vegetative cover should be established on denuded areas at final grade if they are not otherwise permanently stabilized.

Properties adjacent to the site of a land disturbance should be protected from sediment deposition through the use of buffers or other perimeter controls, such as filter fence or sediment basins.

All temporary erosion control systems should be designed to contain the runoff from the developed two year, 24-hour design storm without eroding.

Provision should be made to minimize the tracking of sediment by construction vehicles onto paved public roads. If sediment is deposited, it should be cleaned every day by shoveling or sweeping. Water cleaning should only be done after the area has been shoveled out or swept.

Wash water from paint and wall finishing equipment should be disposed of in a way which will not adversely impact waters of the state. Untreated disposal of this wastewater is a violation of State Water Quality laws and statutes and, as such, would be subject to enforcement action.

Source control Best Management Practices (BMPs) such as plastic covering, mulch, temporary seeding, and phased clearing (for example) should be used to control erosion during construction. More examples of effective source control BMPs can be found in Ecology's two stormwater management manuals, *Stormwater Management for Puget Sound (1992)* and *Stormwater Management Manual for Western Washington (2001)*.

This project may require a construction stormwater permit (also known as National Pollution Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Stormwater Discharges Associated with Construction). This permit is required for projects which meet both of the following conditions:

- a. one or more acres of soil surface area will be disturbed by construction activities; and
- b. the site already has offsite discharge to waters of the state or storm drains or will have offsite discharge during construction.

An application with instructions can be downloaded from Ecology's website at <http://www.ecy.wa.gov/programs/wq/stormwater/construction/#Application>. Construction site operators must apply for a permit at least 60 days prior to discharging stormwater.

July 16, 2009
Page 4

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(SM: 09-3517)

cc: Anya Caudill, SW&FAP
Stephanie Jackson, WQ
Laura Klasner, TCP
Josh Klimek, HQ/WQ
Sarah Lukas, SEA
Roberta Woods, WQ
Jean Carr, Shea, Carr & Jewell (Authors)

Department of Ecology

Shorelines/Wetlands:

1. Although the wetlands are considered exempt under City of Lacey regulations adopted in accordance with DOE guidelines, their fill will require approval of an administrative wetland development permit and mitigation volunteered by the applicant. Mitigation plans will be in accordance with LMC 14.28. The Department of Ecology will be considered a reviewing agency for purposes of processing the permit and will, therefore, be given the opportunity to provide recommendations on the wetland development permit.
2. The developer will obtain a Jurisdictional Determination from the U.S. Army Corps of Engineers.
3. Conditions specific to a wetland development permit, including the compensatory wetland mitigation will be reviewed and approved through the permit process subject to the provisions of the City's Wetland Protection Ordinance (LMC 14.28). Again, DOE recommendations will be sought as is customary during the City's wetland development review process.

Solid Waste & Financial Assistance:

4. Comments noted.

Toxics Cleanup:

5. A mitigation statement has been added that will require soil sampling for lead and arsenic as a condition of Site Plan Review approvals. **p. 3-8, #9**

Water Quality:

6. Comments noted. These items have been addressed through the mitigation statements included in the SEIS.



COUNTY COMMISSIONERS

Cathy Wolfe
District One

Sandra Romero
District Two

Karen Valenzuela
District Three

PUBLIC WORKS

Lester Olson
Director

MEMORANDUM

TO: Samra Seymour, City of Lacey

FROM: Kevin Hughes Thurston County Roads and Transportation Services Development
Review Section KH

DATE: June 30, 2009

SUBJECT: **Lacey Gateway Town Center**
Thurston County Project #: 2009101668
City of Lacey Project #: 07-219

REFERENCE: DSEIS – Dated June 16, 2009

Thank you for the opportunity to review the Draft Supplemental Environmental Impact Statement. Based on an individualized examination of the proposal, we have determined that there will be a significant impact that can be mitigated. The County has several projects that will be impacted. I have included a copy of our Traffic Mitigation Estimate worksheet, outlining the affected CFP projects, with the associated impact trips, and mitigation. The Thurston County mitigation estimate for Phase I is \$1,434,903.

Thurston County also acknowledges that the developer has agreed to construct the improvements at the intersections of Martin Way/Carpenter and Sleater Kinney/15th Ave prior to their final occupancy if other parties have not completed these improvements by that time.

If you have any questions, I can be reached at 360-754-3355 ext. 6594.

Attachment: Traffic Mitigation Worksheet

cc: Project File

KH:rp\\MC1\DATA\DEVSERV\TRACK\AMANDADOCS\DOCHOLD\18611255078.DOC

Building #1, 2000 Lakeridge Drive SW, Olympia, Washington 98502-6045 (360) 357-2493 Fax (360) 754-2939

County Project Reviewer	Kevin Hughes	Ref. Traffic Analysis (Firm, Date)	SheaCarrJewell, May '09
Permit Type	Master Plan	Project Description	Commercial/Residential Development
Permit No.	2009101668	Number of New Trips	2,874 PM Peak
Permit Name	Lacey Gateway Town Center		

County Road Project No.	Capital Facility Project Description	Project Cost <small>(in Thousands of Dollars)</small>	Constant Denominator	Per Trip Cost	New Trips	Mitigation
61329	CARPENTER RD CAP IMPV	\$8,211	5000	\$1,642	600	\$985,320
61338	MERIDIAN RD UPRD (MARTtoCITY)	\$2,360	4000	\$590	20	\$11,800
61335A	15TH AVE NE (OLY CITY LIMITS TO COLLEGE)	\$14,638	4000	\$3,660	42	\$153,699
61335B	15TH AVE NE (COLLEGE TO DRAHAM)	\$8,882	4000	\$2,221	58	\$128,789
61335C	DRAHAM ST NE (15TH TO CARPENTER)	\$8,705	4000	\$2,176	70	\$152,338
KIN	KINWOOD RD UPRD(PACIFtoMART)	\$3,450	3500	\$986	3	\$2,957
THURSTON COUNTY SUBTOTAL						\$1,434,903
Affected Jurisdictions						
TOTAL						\$1,434,903

- NOTES:
- This estimate was prepared with the best available information. The traffic mitigation estimate will be updated annually based on the most current Capital Facilities Plan (CFP).
 - All traffic mitigation unless otherwise noted are due prior to final plat approval, certificate of occupancy or final project acceptance.
 - Project Number: Accounting number for Capital Facility Project.
 - Trip "Hits": Project generated trips intersecting or passing through the project limits of a particular capital facilities project.
 - Project Cost: Please refer to the County Comprehensive Plan, Capital Facility Chapter for additional information.
 - Consistent Denominator: This number represents the capacity at or near Level of Service 'D' or 'C' in the urban and rural areas respectively under ideal conditions as described in the Highway Capacity Manual.
 - The Project cost for Yelm Highway Capacity Project (Henderson to Blvd) has been reduced by \$1,052,000 to reflect the City of Olympia owned/maintained portion.

last revision: 5/09

Thurston County Roads and Transportation Services

- 1) Traffic mitigation will be paid to Thurston County Development Services prior to issuance of building permits. A specific mitigation statement based on comments received has been added to the document. ***p.3-66, #2***



LACEY FIRE DISTRICT THREE

Making A Difference

COMMISSIONERS
John L. Christiansen
C.H. Skip Houser
K. Frank Kirkbride

CHIEF
James M. Broman



June 24, 2009

Mr. Rick Walk
Senior Planner
City of Lacey Planning Department

Dear Rick:

After reviewing the Draft Supplemental Environmental Impact Statement for the Lacey Gateway Town Center, and comparing this version to the version we reviewed in December of 2007, we have the following input.

In section 3.1 we asked that, "within the civic area which at the time was 104,400 sq. ft.", the plans reflect a dedicated site for a future 12,000 sq. ft. fire station. It now appears that this area has been reduced to only 30,000 sq. ft. without specific mention of a future fire station. This may be something the City plans on addressing in a future phase. If so, please let us know.

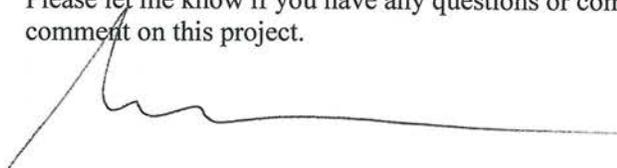
1

Under Impacts – Fire Protection (3-69) the plan identifies that during public events and celebrations in the open space plaza, planning and coordination will take place to insure that medically trained personnel and equipment are on site to provide initial response. This is a good approach to deal with the special public events that may occur in the plaza area but should not be considered as adequate for 24/7 basic Fire and EMS services.

2

All other concerns in the December 2007 letter seem to have been addressed.

Please let me know if you have any questions or comments and thank you for the opportunity to review and comment on this project.


Gary Pearson, Assistant Fire Chief
(360) 528-2333 Office
(360) 790-6600 Cell

1231 Franz St SE • Lacey, WA 98503-2412 • (360) 491-2410 • FAX: (360) 491-2806



LACEY FIRE DISTRICT THREE

Making A Difference

COMMISSIONERS
John L. Christiansen
C.H. Skip Houser
K. Frank Kirkbride

CHIEF
James M. Broman

December 30, 2009

Mr. Rick Walk
Director of Community Development
City of Lacey



RE: Gateway SEIS

Dear Rick:

Per your request here is some clarification on the requirements for the Gateway SEIS.

Two years ago with the assistance of Les Townzen and Associates we provided comments on the review of the master plan. In that response we provided the following comment:

- Under the mitigation, the evaluation of response times is not proposed until build-out of the project. The evaluation will need to take place at the end of each phase of the project and depending on the types of residential and transient housing is provided, the district may have to evaluate during major construction periods in any one phase. The need for the additional fire station may need to be built sooner or later in the project depending on what is being built at the time. The district will need to have continuing evaluation of response times as the project develops.

Even though there is a master plan for the project, we also know that master plans can change over time, and what we see for the future phases now may change because of changing trends or changes in the needs of the community and/or area.

Because of this, it is imperative that the fire department's level of service will need to be evaluated as each phase of this project moves ahead.

This review of each phase will include the following areas:

- Response times.
- Review of the type of the buildings that are proposed.
- The level of risk associated with each building in each phase.
- Fire flow needs based upon the type and size of the buildings.
- Access issues with respect to the infrastructure of the site and future phases.

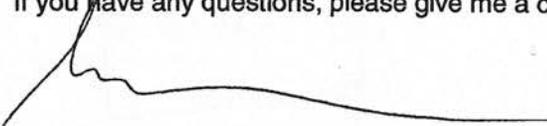
1231 Franz St SE • Lacey, WA 98503-2412 • (360) 491-2410 • FAX: (360) 491-2806

All of the issues above are reflective in how the district can provide a certain level of service.

Currently as Phase I is proposed, the fire district feels they can maintain the current level of service for the area.

3

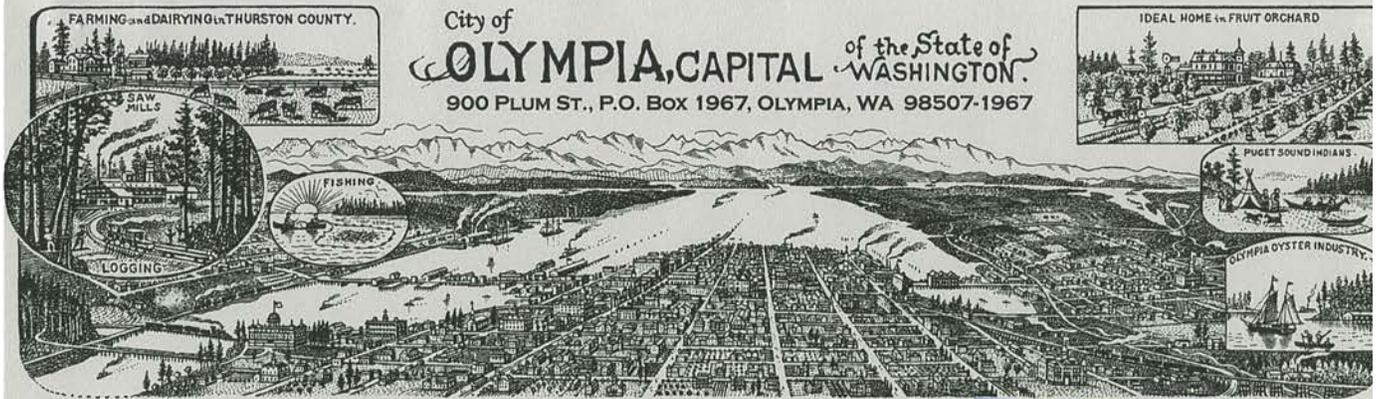
If you have any questions, please give me a call.



Gary Pearson, Assistant Fire Chief
(360) 528-2333

Lacey Fire District #3

- 1) At this time the exact nature of the civic space remains unknown. The principle goal of the civic use discussion in the SEIS is to ensure that these uses are considered in the early stages of planning and site development.
- 2) Comment noted.
- 3) Comments noted. Thank you for providing clarification of earlier comments and discussions.



This letterhead is a replica of 1899 City of Olympia letterhead, which we are using in commemoration of the City's 150th Anniversary.



July 16, 2009

Rick Walk, Director of Community Development
 City of Lacey Community Development Department
 PO Box 3400
 Lacey, WA 98509

**SUBJECT: City of Lacey Draft Supplemental EIS for the Lacey Gateway Town Center
 Planned Action**

Dear Mr. Walk:

Thank you for the opportunity to comment on the Draft Supplement EIS (SEIS) for the Lacey Gateway Town Center Planned Action. In reviewing the Draft SEIS and technical appendices, we would like to offer the following comments and request that they be addressed in the Final SEIS:

1. It is our understanding that the Draft SEIS and Planned Action only relate to Phase 1, and that subsequent phases of development will be subject to additional SEPA review. We would appreciate confirmation that our understanding of the Draft SEIS and Planned Action is correct. Notwithstanding our comment in item 2 below regarding environmental review for future phase, the City requests that we continue to be notified of any additional SEPA review as the Gateway Town Center develops. Such notice should be directed to the City's SEPA Official.

2. We would like to understand the rationale behind issuing separate threshold determinations for future phases. Phase I proposes a total floor area of 1.2 million square feet of retail, commercial, office and civic uses, and 500 residential units. In contrast, the future phases entail a total floor area of 1.8 million square feet of retail, commercial, office and civic uses, with up to 2,000 residential units. Because the



COUNCILMEMBER CRAIG OTTAVELLI
 COUNCILMEMBER RHENDA IRIS STRUB
 COUNCILMEMBER KAREN MESSMER

COUNCILMEMBER JOAN MACHLIS
 COUNCILMEMBER JOE HYER

MAYOR DOUG MAH
 MAYOR PRO TEM JEFF KINGSBURY
 CITY MANAGER STEVE HALL



magnitude of the future phases is similar (if not greater) than Phase I, a second Planned Action should be established. This is of particular importance in light of the fact that the Draft SEIS does not provide a solid cumulative analysis of traffic impacts for the future phases.

3. Page 1-2 indicates that the Planned Action will remain in effect until the end of 2020. We assume that any land use applications associated with Phase I submitted after this date would require a separate threshold determination. This should be clarified in the SEIS, and as a suggestion, incorporated into the development agreement to avoid future question as to the scope of the Planned Action.
4. Page 1-1 indicates that the cumulative impacts of the conceptual and programmatic aspects of the future phases are addressed in the Draft SEIS. Specific to traffic impacts, we were unable to find a cumulative impact analysis. Thus, we are concerned that the Draft SEIS purports to have addressed the impacts of the future phases when it appears that it has not.
5. Page 4 of the Transportation Analysis indicates that the analysis for full build-out of Gateway Town Center project will consist primarily of a “comparative and qualitative” analysis utilizing previous transportation studies conducted for the Hawks Prairie area. It is unclear whether this analysis is intended to occur at this time or as part of the future phases. Additionally, we question the use of a qualitative analysis within the context of traffic impact analysis. As suggested above, a project of this magnitude should take a comprehensive and integrated approach (i.e., Planned Action for future phases) in identifying impacts and associated mitigation. Such an analysis should be quantitative in nature and take into account the full cumulative impacts of the proposed development on Olympia’s street system.
6. Based on the travel demand modeling and level of service analysis for Phase 1 of the Lacey Gateway Town Center, there will not be a significant impact to the City of Olympia street network. However, if during build-out of Phase I, the City of Lacey determines that a new EIS or threshold determination is required, the City of Olympia requests that notices of such actions be submitted to the City’s SEPA Official to determine if payment of traffic mitigation is required.

Beyond Phase 1, it has not been determined if there will be cumulative impacts as a result of future phases. Future traffic analysis would include cumulative impacts with and without Phase 1 plus future proposed phases. Therefore, prior to approval of

Mr. Rick Walk
July 16, 2009
Page 3

additional phases, the City of Olympia would like the opportunity to comment and require SEPA mitigation costs and/or capacity improvements if needed.

7. As a minor comment, page 3-63 indicates a five-year construction period for Phase I, where all other references indicate a ten-year build-out.

Again, thank you for the opportunity to comment on the Draft SEIS for the Lacey Gateway Town Center. If you have any questions or wish to discuss any of the City of Olympia's comments, please do not hesitate to contact me at 753-8048.

Sincerely,



Cari Hornbein, AICP
Senior Planner/SEPA Official

CH:nl

cc: Keith Stahley, Director of Community Planning and Development
Todd Stamm, Planning Manager
Dave Smith, Project Engineer II
Randy Wesselman, Engineering and Planning Supervisor
Darren Nienaber, Deputy City Attorney

City of Olympia

1. This understanding is correct. This SEIS and Planned Action only relate to Phase 1 of Lacey Gateway Town Center. Future phases or actions proposed that would exceed the maximum thresholds established in this document, will be subject to additional SEPA review. The City of Olympia SEPA Official will be notified of any future SEPA review that pertains to the Lacey Gateway Town Center, as shown in Figure 1.3.
2. Phase 1 will ultimately be a part of a larger community and furthermore, the planning of future phases will require the careful consideration of earlier phases in order to appropriately integrate the existing development with the new.

The purpose of including square footages for a conceptual build out scenario is solely to provide some semblance of long-term context for the entire area now known as Lacey Gateway Town Center. The City and applicant cannot be certain that the build-out scenario presented in this SEIS will accurately approximate future market demand and community needs. Because of this uncertainty, including future phases in this Planned Action would be undesirable. However, as noted above, it is recognized that the impacts of future phases will most certainly require the consideration of the cumulative impacts from Phase 1, and should not be considered in isolation. Any future threshold determinations, whether through a Planned Action and SEIS or other means, will consider the cumulative impacts of development. (see further discussion in response to City of Olympia comment #4)

3. The Planned Action for Phase 1 of Lacey Gateway Town Center and this environmental determination will expire 20 years from the date the Planned Action ordinance is adopted. Any subsequent land use application would require a new threshold determination. This has been clarified within the FSEIS document. **p. 1-2**
4. This comment is particularly well received. This language in the DSEIS was unclear and warrants further explanation and clarification. It is the intent of this SEIS to analyze the impacts associated with Phase 1 of the Lacey Gateway Town Center. This Planned Action does not extend to any future phases of the development. Therefore it would be imprudent to attempt to analyze future phase impacts when they remain overwhelmingly unknown. Comment #4 was correct in that the SEIS does *not* address the impacts of future phases for traffic, or other impacts, nor was it the intent of this document to do so. The text that is referred to in this comment has been changed to more accurately explain how future phases are understood and considered in this SEIS. **p. 1-1**
5. The intention of this SEIS to analyze impacts of full build-out has been addressed in previous responses to comments. Development beyond the scope of Phase 1 will be analyzed for cumulative impacts through additional environmental review at the time of development application. Furthermore, if a future phase of the Lacey Gateway Town Center project were to be proposed prior to the construction of Phase 1, Phase 1 would be used as a pipeline project in determining the impacts of the future phase on the road system. **p. 1-21**
6.
 - a. If a new EIS or threshold determination is required during the build-out of Phase 1, notice will be submitted to the City of Olympia SEPA Official for comment.
 - b. The request to comment on future environmental reviews for Lacey Gateway Town Center was addressed in response to Comment #1.
7. The document has been changed to reflect the ten-year build out scenario. **p. 3-63**

Samra Seymour

From: Dennis Bloom [DBloom@intercitytransit.com]
Sent: Thursday, July 16, 2009 4:26 PM
To: Rick Walk; Samra Seymour
Cc: Mike Harbour; Roger Dean
Subject: Project #07-219: Lacey Gateway Town Center Draft SEIS

Rick Walk, Director
Community Development Department
City of Lacey

Re: Lacey Gateway Town Center Draft SEIS

Mr. Walk,

Thank you for the opportunity to comment on the Draft SEIS for the proposed Lacey Gateway Town Center. As you know, Intercity Transit currently does not provide service in the area of the proposed project. However, with the anticipation of significant increases in both residential and commercial development within the Gateway Town Center over the next 5 - 20 years, including on-going development within the Lacey city limits north of I-5, we do expect to extend transit service within the next few years and improve a number of transportation options to those that live and/or work in this area.

The Draft SEIS, as you know, contains a number of references to "public transportation" and "transit facilities" as well as items noted within Chapter 3: Build Environment, Level of Service Standards. We are encouraged by the suggestion that as a result of Phase 1 mix use development that there will be, "...opportunity to provide enhanced multi-modal opportunities including facilitating transit service to serve the Town Center, identifying /reserving areas for future transit center activities, accommodating park and ride facilities and working with employers to develop trip reduction plans." And in these instances it suggests the City of Lacey and the developer will work with Intercity Transit to provide locations for bus service, stops, shelters, and layover areas for future service within the development in order to support the use of flexible and fixed routed bus service.

Intercity Transit is also pleased that the developer acknowledges the importance of transportation options as well as actively supporting the opportunity to improve access to public transit. Given the breath of possibilities for providing public transit service in around the Gateway Town Center we suggest that specific mitigation measures be included that address the following:

- a) Provisions for locating bus stops and providing stop amenities should become a condition of development and mitigation.
- b) Bus stop locations be no more than a ¼ mile of residential housing (up to a 5 – 10 minute walk for most) or within the central business district bus stops be considered every 2 to 3 blocks apart.
- c) Bus stops and sidewalks/pathways associated with the stops are constructed to meet federal ADA requirements and/or "universal design" standards for accessibility.
- d) Develop a series of pedestrian and other non-motorized transportation pathways and/or trails (e.g., "safe routes to school" and safe routes to bus stops) that provide more direct or shortest path to an arterial street so that people aren't required to walk "the long way around" to reach a bus stop for public schools and transit.
- e) Develop bicycle storage areas at or near public areas including retail areas, bus stops, parks, etc., and
- f) Street widths (possibly updating city code), including corner turning radius, that accommodate transit

7/17/2009

1

vehicles.

Development of a Park & Ride and/or transit center, as suggested in the Draft, have very different functions. If the intent of the developer is to set aside land for either type of facility the location would be a significant factor in its undertaking. At this point in time, Intercity Transit would simply suggest that the developer provide a better sense of timing for what is feasible and identify potential site location(s). However, there is little detail, analysis or provision in any Phase of the development for such facilities. And the current Traffic Analysis and modeling apparently does not consider transit service at this point.

It should be noted that over the past couple of years the developer has discussed conceptual ideas for transit facilities with Intercity Transit staff. Since park and rides are traditionally better suited near limited access roads (highways and interstates) we would expect that any provision for another park & ride in or near the Gateway Town Center be situated close to a major traffic corridor so that its function provides easy access for vehicles and transit alike. However, a development of smaller "park & pool lots", which is more in line with those that carpool or vanpool or smaller neighborhood park and rides associated with bus service, could be located near retail centers or shared use parking lots or activity centers. A community park or recreational center where weekday parking is abundant might be a consideration.

In addition, Intercity Transit has recently received a WSDOT grant to start the design and construction of park and ride on a capped portion of the Thurston County Landfill with access off of Hogan Bay Road. The current plan includes approximately 325 parking stalls at grade and a bus turn-around area that accommodates a small station with rider amenities. If full funding is realized we would anticipate the opening of the lot in late 2012.

As with any provision for public transit service, residential density is key component on how successful a particular route can be. The fact that the project anticipates commercial development and employment within the development will make it much more urban setting that will have a higher demand for transit service. Even with the current cost for vehicle fuel slowly increasing again, the ability to attract and maintain a ridership base is dependent on convenience, frequency and directness and travel time of that service. Intercity Transit is certainly interested in working with the City and the developer to help plan for those services and would suggest that the Final SEIS be more specific and reflective of those interests.

Thank you again for the opportunity to provide comment on the Draft SEIS. If there are any questions or if you need additional clarification about my comments please, feel free to contact me directly at your earliest convenience.

Sincerely,
Dennis Bloom

Planning Manager
Intercity Transit
V: 360.705.5832
W: Intercitytransit.com



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2

Intercity Transit

- 1) Thank you for the comments. Additional items have been added to the Site Access and Circulation Improvements mitigation on page 3-65. Specifically, the internal circulation plan required by mitigation item #2 now addresses bus stop locations and amenities and bicycle storage areas. Also, language has been added that strengthens the circulation plan's emphasis on pedestrian mobility and accessibility. **pp. 3-62, 3-65**
- 2) The City of Lacey's current street width standards are designed to accommodate transit vehicles and turning radii.

Samra Seymour

From: Anne Sunrise [annewsunrise@yahoo.com]
Sent: Sunday, July 12, 2009 3:14 PM
To: Rick Walk; Samra Seymour
Subject: RE: Lacey Gateway Town Center project and Climate Change

Dear Rick and Samra,

I'm deeply concerned about the proposed deforestation of 250 acres for the Lacey Gateway Town Center. And I was shocked by the 6/20 the Olympian headline: "NO ADVERSE IMPACT SEEN AT LACEY SITE.." Deforestation always contributes to global warming and other climate changes. According to the International Panel on Climate Change and the recent Obama administration report:

- We are already suffering increased forest fires, heat waves, floods, droughts and hurricanes as a result of climate change.
- A one degree increase in temperature worldwide will result in loss of grain and crop production resulting in increasing famine, 30% of species at risk of extinction, increased malnutrition, infectious disease and waterborne disease.
- A two degree increase in temperature worldwide will result in melting the polar ice caps, causing an 8 to 12 inch rise in coastal water around the globe, flooding many sea level towns (including parts of South Seattle), affecting 15% of ecosystems, melting permafrost and releasing even higher levels of carbon. The northern polar ice cap has already melted, a very serious sign.

If the US had signed the Kyoto treaty we would now be back to carbon levels of 1990. Instead we have huge increases in emissions. If we pass HR2454 (the House passed it, but the Senate hasn't considered it), it would take until 2020 to get back to a 1990 level and until 2050 to a level low enough that we have a 50/50 chance of avoiding a two-degree increase in temperature worldwide! Scientists say the bigger and faster the reductions, the better are chances of survival. This bill may not be enough, but it is essential! In Nov. there will be a meeting in Copenhagen to try to reach international agreement on how to avert this crisis. As the biggest carbon polluter of the world we must come to the table willing to take credible and significant action!

Please contact Senators Murray and Cantwell and urge them to pass stronger climate change legislation than the House of Representatives did. Emails and letters are best but you can also phone them toll-free at 1-866-481-9186 and 1-888-648-7328 respectively. Also drive less, bus more, walk more and any other things you can think of or learn. Some of many ways is to invest in reforestation and use appliances that save energy..

Regarding the Lacey Gateway Town Center, great effort should be made to save as much forest as is humanly possible. Our long term survival is literally at stake.

Thank you for "listening!"

Sincerely,

Anne Sunrise

7/17/2009

360-705-0836

annewsunrise@yahoo.com



7/17/2009

Comments noted. The project will meet the City's goals of balancing development with natural area protection. Existing trees will be retained and protected within the designated greenways and open space corridors meeting City requirements. One of the goals of the Gateway Town Center is to build a mixed use, compact, pedestrian orientated development that will promote transit use, and reduce vehicle miles traveled within the community.



July 16, 2009

Rick Walk
Responsible Official
City of Lacey Community Development Department
P.O. Box 3400
Lacey WA 98509

Dear Mr. Walk:

Thank you for allowing me the opportunity to comment on the proposed Lacey Gateway Town Center. I commend you for incorporating clustered mixed use development that allows pedestrian access to retail stores. Some of my concerns include conclusions that there are “no significant impacts” to many of the analysis, but also, the concern of drawing away shoppers from current local businesses, and the need to drive to this “new” center..

1. Under the Traffic Analysis (Pgs 7-8), the report states that there will be a significant increase in traffic volume in the immediate vicinity. It was then determined in the SEIS that at full build-out (P.1-18), 6 intersections will have a failed LOS. But then the document states it will have a later environmental review after Phase 1. This puts the analysis “down-the-road” to the point that by the time failure is analyzed, there is no way to avoid or reduce the affects of this LOS and leaves only the option of mitigating a developed impact. This mitigation probably won’t address the problem prior to development. Since this is a Phase 1 proposal, the increases to traffic could potentially spread to outlying areas as well, making an even worse impact. If nothing else, a brief discussion of the current proposed impact should be included in this SEIS and up-front mitigation measures proposed for the impact so that the public has some idea as to how you would address the worst-case scenario.
2. In the SEIS, P.1-17, it states that there will be unavoidable increases in demand for potable water and that development will increase groundwater infiltration (storm water runoff) due to loss of existing vegetation. There will be an increase in impervious surface area. Please summarize the mitigation measures to reduce this “unavoidable increase in demand for potable water and increases in storm water runoff.

I understand you will utilize reclaimed water for maintaining green spaces. That is commendable.

3. Little discussion was done on how this center’s traffic will impact services and response times. Even with a new police station, this will take time to build, find staff, and maintain. In the meantime, services (emergency services and police services will be impacted and response times, if coming from the stations at present, will increase, so I disagree that services won’t be significant. Please

discuss how these services will meet demand as they need to respond prior to full build out.

4. While cumulative impacts were analyzed in earlier environmental reviewed documents, because the Lacey Gateway Center (LGC) has not yet been built and, as stated, "...changes in baseline are unknown" (P1-21), how then, have they been "analyzed"? Analysis can't take place if there isn't anything to analyze yet, as was the case in prior documents. I request that additional cumulative impacts be discussed: 1) cumulative impacts of Cabela's traffic and the proposed LGC, 2) cumulative impacts on water resources between Cabela's and LGC, and 3) cumulative impacts of services on response time, and how it would impact other already established business and residential areas (i.e., College Street/Panorama City, Marvin Road areas).
5. Given that Lacey is already experiencing increased crime from the Lakewood/Tacoma areas, it is likely that this proposed development will see an increase because of accessibility, i.e., a shorter distance from Lakewood/Tacoma makes this area more vulnerable. There was no discussion on whether services would increase and if so, how will Lacey deal with this increase.
6. Lastly, because the LGC is several miles away from current shopping areas, there is a possibility that either 1) economic vitality and growth will shrink in the established areas causing a loss of businesses and depressing the existing areas to the point that services can't be met, or 2) the LGC will be an isolated community unconnected with the greater Lacey area, thus, not identifying with the City and not supporting its revenue base causing a loss of revenue for services. Please analyze this proposal in terms of 1) Impacts public services for current business and residential areas in reference to the above statements, and 2) possible displacement impacts and proposed measures to reduce impacts.

Even though the design and concept is excellent, I'm truly sorry this concept wasn't applied to earlier developments, i.e., the Costco/Best Buy area on Marvin and Martin Roads, or even around Sears/PetSmart Areas (Sleater Kinney and Pacific). Infilling would have helped to make the City of Lacey an energetic community where people can shop, have lunch with their friends and maintain or improve economic vitality of local businesses. The Gateway Town Center only drives home the we are sprawling ever farther down the I-5 corridor and forcing us to drive, not walk to this proposed center, if we want to shop there.

Sincerely,



Cynthia R. Pratt

1. The DSEIS identifies impacts to the transportation system resulting from the development of Phase 1. Mitigation has been identified to address those impacts and is described on pages 3-63 through 3-66 of the DSEIS. Mitigation includes physical improvements to six intersections that drop below acceptable level of services standards as a result of Phase 1. Additionally, payment of mitigation fees in the estimated amount of \$3,298,895 will be required to proportionately fund the project's impacts to intersections listed on the City's six-year Transportation Improvement Program. In addition, \$1,434,903 in traffic mitigation fees will be paid to Thurston County. All mitigation is to address the identified impacts associated with Phase 1 of the Gateway Town Center. All future development proposals beyond Phase 1 will be subject to additional environmental analysis and mitigation, cumulative to Phase 1.
2. Mitigation measures reducing increases in demand for potable water are listed on page 3-18 of the DSEIS. The primary mitigation tool to reduce the demand of potable water is the use of reclaimed water for irrigation and toilet flushing within the development. The amount of water committed to Phase 1 of the Gateway Town Center is 227,300 gallons per day, provided that reclaimed infrastructure is installed through out Phase 1 and that Phase 1 develops as a mix use town center as described in the DSEIS. Other factors that reduce potable water demand which are not discussed in the DSEIS because they are within the City's existing code frame work are the installation of low flow/water conservation fixtures such as toilets and faucets. This is required within the City's adopted building codes. The mitigation measures to reduce the impacts from increases in stormwater runoff are also described on page 3-18 of the DSEIS. In summary, measures to reduce stormwater impacts reflect the requirements of the City's adopted Drainage Design and Erosion Control Manual. Prior to development of the site, a final engineered stormwater plan will be submitted to the City for approval. The plan will provide final designs for the stormwater collection system to ensure that all stormwater generated from the site is sufficiently clean and treated to State and local standards prior to infiltration into the ground. In addition, mitigation allows for the use of low impact development strategies such as rain gardens, bio swales or other similar designs to be incorporated into Phase 1 stormwater design.

Impacts of development beyond Phase 1 were not analyzed by this DSEIS. When specific and quantifiable development is proposed in the future phases further detail environmental analysis will be required.

3. Through the environmental analysis and development of the DSEIS, comments were received from Lacey Fire District stating response times from Station 35 and Station 34 will be adequate to serve Phase 1. The potential need of an additional station was indicated when the future phases are developed. At this time, future build out phases are not quantifiable. When a specific development proposal is submitted for the future build out areas, further environmental analysis will be conducted that will include reviewing impacts to emergency services and response times.

As indicated in the public services analysis beginning on Page 3-66, the majority or 89% of annual emergency responses for Lacey Fire District #3 are for basic and advance life support (medical calls). While response times were determined to remain adequate, it is reasonable to expect an increase in medical calls as a result of the development of Phase 1.

To mitigate the increase in calls, mitigation as outlined on Page 3-70, includes provisions for:

An emergency access and fire suppression plan that addresses emergency response during site construction will be developed and submitted to the Lacey Fire Marshal for approval prior to building construction; The water system designed and constructed to provide adequate water to meet fire flow and hydrant requirements; The site and buildings constructed to meet the International Fire Code which requires fire protection methods such as fire rated walls, sprinklers, commercial fire alarms, etc.; An emergency response plan prepared and submitted to the Lacey Fire Marshall for approval that will detail how emergency services will be planned and coordinated for community events, celebrations, grand openings or similar events; Medical equipment such as defibrillators located throughout the town center; and, personnel, such as private security staff, to be medically trained to provide initial response to medical emergencies.

As also indicated in the public services analysis, this type of development will increase Police Department calls for service. To off-set these impacts mitigation as outlined on Page 3-71 includes provisions such as: Use of Crime Prevention through Environmental Design (CPTED) strategies for building, landscaping and open space designs; A security plan developed prior to Phase 1 development that provides for private security to patrol, monitor and provide basic assistance, automated security cameras through the center and parking areas and identifiable security office. In addition, an area that provides a secure area for law enforcement officers to perform necessary duties and storage of equipment will be provided on site. The substation is to be incorporated into the core of the town center easily accessible to patrons of the center.

The public services mitigation summarized above will be incorporated throughout the design and development of Phase 1 so that applicable mitigation is in place prior to full build out of Phase 1. When a project specific proposal is submitted for the future development areas (referred to as full build out in the DSEIS), additional environmental analysis will be performed and will include a review of impacts to public services.

4. Cumulative impacts of up to and including Phase 1 have been addressed within the DSEIS. Environmental analysis was conducted as a non-project review prior to adoption of the City's Comprehensive Plan in 1994. As site specific development of property implementing the Comp Plan occurred, environmental analysis was conducted. The DSEIS for Phase 1 considers as a baseline demands created by all previous growth and development approved and/or built, including Cabela's. This analysis takes in the cumulative effects of growth to date. The quote of "changes in baseline are unknown" taking from the cumulative effects section of the DSEIS is in reference to future development not yet proposed. It is not known what the specific project scope of future phases beyond Phase 1 of the Gateway Town Center will be or when those future phases will be ready for development. In addition, development and growth will continue to occur within the community and will change the baseline of any future environmental analysis.
5. Local crime statistics were used as the basis for analyzing impacts to public services, which include crimes committed by non-local perpetrators. Mitigation as described in response 3 includes prevention methods such as CPTED, automated security cameras, onsite security and strategic lighting will be implemented to reduce criminal activity.
6. The Lacey Gateway Town Center will be developed as a mixed use center that will provide

a full range of services. The project site is surrounded by neighborhoods, businesses and properties that are within the City of Lacey and the Lacey Urban Growth Area. Existing neighborhoods will be connected to the development through transit and multi-modal transportation corridors. Once there people will be able to get out of their cars to shop, dine, work, etc, as a result of the combination and proximity of retail, office, residential, entertainment and recreation opportunities. The planned residential and office elements will also provide the opportunity for future residents and employees to find a full range of services within walking distance. The potential for business and residential development in the future phases, will enhance the ability to accommodate future employment and population growth in a compact, pedestrian friendly, full service setting.

An environmental impact statement is not required to evaluate and document all of the possible effects and considerations of a decision or to contain the balancing judgments that will ultimately be used by decision makers. Rather, SEPA documents are intended to focus on the analysis of environmental impacts. Other non-environmental issues related to the general welfare, social policy, cost-benefit analysis, and economic competition are taken into consideration during the final decision making process, however, they are not issues addressed by the SEPA process (WAC 197-11-448).

Samra Seymour

From: Rick Walk
Sent: Thursday, June 25, 2009 7:48 AM
To: Greg Cuoio; Scott Spence; Scott Egger; Samra Seymour
Subject: FW: Lacey Gateway Town Center

FYI, Below are comments submitted on Gateway Draft SEIS

From: Matto31794@aol.com [mailto:Matto31794@aol.com]
Sent: Wednesday, June 24, 2009 7:44 PM
To: Rick Walk
Subject: Lacey Gateway Town Center

Dear Mr. Walk,

I am thrilled with the opportunity that the city of Lacey has been presented with by Triway Enterprises. Finally, a golden opportunity has somehow fallen within the grasp of the city of Lacey. I strongly believe that the Gateway Town Center should be built for multiple reasons.

First of all, Lacey is a peaceful, sleeping suburb, that is nestled between the solitary, and economically strong city of Olympia, and the small town of Tumwater. As a result, Lacey has prospered as a quiet retreat for people who desire small town life with a little bit of local entertainment. However, Lacey continues to grow and expand, with the population increasing annually at percentages that far surpass both Tumwater's and Olympia's minuscule growth per year. As I travel around the city, I notice the wonderful rows of colorful trees that dot the sidewalks. Furthermore, it is extremely difficult to find any sign of graffiti in our tranquil community. Also, as I scan the crime reports in The Olympian each weekend, I find columns upon columns of crimes that have been committed in Olympia, and yet, far less in Lacey. Therefore, I am proud to say that I live in such a clean, green, and safe city. Year in, and year out, Lacey has been awarded "Tree City USA" awards, and is consistently a model for how all cities should be.

Despite all the niceties that Lacey has to offer, it has problems just as any other city does. However, Lacey's problems aren't a direct result of gangs, crime, or economic downturn. In fact, western Washington has been one of the least economically affected regions in all of America during the current recession. Therefore, Lacey's main problem is that our city is struggling to establish an identity for itself. Unlike our neighboring city of Olympia which spends months, and years arguing over whether or not high-rises should be built on the isthmus, we continue to calmly, effectively build hundreds of homes each and every year. Recent developments such as Horizon Pointe, and the up-and-coming Kensington neighborhood, has unfortunately caused Lacey to appear like a cookie cut-out city. Rows of homes with slight color variations and mirroring images are beginning to crowd the city. On the other hand, these new neighborhoods offer a low-maintenance, simple, and cost-effective sense of living which is necessary in order to attract people to our city. However, the Lacey Gateway Town Center would officially be the dawn of a new era, and the rise of the urban core of our city. With millions of square feet of retail space, along with thousands of homes, Lacey would be able to turn a couple hundred of forested acres of land into, bright, inviting, and "green" spaces. This town center would provide thousands of jobs to people who need them, as well as a place for the citizens of Lacey to walk around, with a variety of restaurants to eat at, and so many stores to shop at, people would begin to feel as if they were at an outdoor mall.

Finally, about two weeks ago, I read a TIME Magazine article about a city called Tyson's Corner, VA. The city was determining how to turn a city full of parking lots and traffic jams into a pedestrian friendly city, with hundreds of acres of green spaces. As a result, the city council of Tyson's Corner agreed to a plan which would allow them to build green, and pedestrian friendly shops and streets. Tyson's Corner was planning a city-wide project, covering over 1,200 acres, about five times the size of the Lacey Gateway Town Center. 10% of the land in Tyson's Corner would be redeveloped into, open green spaces, such as parks, retention ponds, and playgrounds. Ironically, in order to build green Tyson's Corner will spend anywhere from 30-50 years revolutionizing, and building, causing even more carbon dioxide emissions to be expelled from their city. However, over the course of time, their new green city will leave a smaller carbon footprint on the planet. Therefore, I am not hoping that the city of Lacey will copy the master plans of this Virginia town; but I do hope that Tyson's Corner redevelopment plan stands as an example of how communities should be

6/25/2009

built. Furthermore, 11% of the Lacey Gateway Town Center would be green spaces, which would exceed the standards set by Tyson's Corner. In addition, I hope that the Lacey City Council doesn't show hesitance when the theory of building high-rises is discussed. High-rises provide the ability for a retail, or department store to occupy the first two ground floors of the building, with residential condos in the upper floors. On the roofs of the high-rises could be high-tech solar panels, or simply vegetation, gardens, and trees. Therefore, what would really happen is the ground would be uprooted, and vegetation would be removed from the ground, but eventually, the vegetation on top of the skyscraper would actually cause there to be literally no carbon footprint from the building. If skyscrapers are built; (which I hope that they will be) than the condos would offer panoramic views of the surrounding Gateway Town Center, and the beautiful vistas of Mount Rainier.

Lacey doesn't need change, but it does need to evolve. Lacey has been carefully planned out, and it is clear that it was built with the future in mind. The city of Lacey will be ready when this project is completed by the end of the next decade. With the improvements on College Street, and the positive reaction from the community, the answer to the Lacey Gateway Town Center proposal should be an easy "yes" for our city council. The town center would provide, a clean safe, downtown that can't be found anywhere else in Washington. Especially considering the graffiti and crime that litters Olympia's downtown, it is time for Lacey to provide positive growth and change to all of Thurston County. Also, even though the clear-cutting of the forests in the Hawks Prairie region would give our city a twinge of guilt for a moment, just keep in mind how green and wonderful the city will be when construction is completed! Please consider what the Lacey Gateway Town Center will provide for not just the people of Lacey, but the millions of people who drive up and down the I-5 each year. The town center would be convenient for many Washingtonians driving through the Hawks Prairie region, to stop and shop. As a result, the Town Center would ensure economic stability in our city for decades to come. Simply, I am in love with the idea of the Lacey Gateway Town Center. I can't wait until the year 2020 when this project should be completed. Thanks for viewing my opinion on the Gateway project!

Sincerely,
Matthew Connor

Make your summer sizzle with [fast and easy recipes](#) for the grill.

6/25/2009

Thank you for your comments, they are noted.

Response to Gateway proposal

RECEIVED

JUL 16 2009

PUBLIC WORKS

1:22 PM

TO: Lacey Community Development Department

SAMRA Seymour

I begin my evaluation of this project by referring to the front-page article in the Olympian dated June 20, 2009. The headlines read "No Adverse Impact Seen At Lacey Site". This is an insult to my intelligence.

1.. Clearcutting: forests is a very serious and irreversible impact....you cut down 300 acres of trees to make way for Cabela's 'outdoor' store. Doesn't that seem contradictory to destroy forests to put in an outdoor store complete with hunting gear while all the wildlife is displaced. Tree planting does not a forest make...a forest is an ecosystem our biggest ally in global warming....On TV, there is a program "Cool Thurston" All the measures mentioned ie recycling etc. are a moot point as we cut our forests in Thurston..

You clearcut another 50 +acres across from rock quarry on Britton Parkway...this was a forest complete with 100+ year-old trees....I used to walk the land there enjoying the cedar and maple groves and various fir...and dense forest cover. During the butchering of this land, I walked it again to be a witness to this dangerous direction Lacey has opted for in this "Urban Growth" project...We are destroying forests to preserve rural area? Nonsense... We have one of highest cancer rates in the nation, especially along the I-5 Corridor.... We need to treat our trees (forests) as our first line of defense against cancer, allergies....asthma... We need to keep all our trees especially along our freeways to absorb as much carbon imprint as possible. Instead, we have traded trees for traffic....a very poor choice. The air quality has plummeted in Lacey and Thurston County since I moved here 8 years ago...I traded areas north to come here...and now we are becoming and have become like those areas north.

2. Traffic: during the past 8 years I have been here...has become gridlock...many folks now are doing their shopping outside of Lacey for this reason. Traffic coming down from Cabelas has now made problems for us living on Draham and 15th...The aggressive SUVs are speeding and tailgating down our once peaceful road. Making the road wider would certainly only make this situation worse – cars speeding more which has been proven in past studies.

3. Freeway Noise:. On 15th there have been 15-25 plots of land clearcut for housing already...yet they remain empty of building probably because of the recession. All the clearcutting along 15th and Britton Parkway...means more noise pollution as well as air pollution. Now instead of nature, ie. Creek sounds, we hear the freeway noise.

I have lived overseas and other places in the United State. I have seen this kind of project take over an area...once liveable...and make it a place you want to leave. In fact, a higher GNP/GDP usually correlates to the destruction of an areas resources and liveability...and makes for a much lower quality of life...as David Korten, economist and author, describes in his article Money versus Wealth...is that "The money system becomes like a

cancer that consumes its host” This is what has happened here...as the developers have come up with this Gateway scheme. Do we really need more retail ...?? We have clearcut vast swaths of land to accommodate this idea of consumer frenzy...We have no need for more stores since we already have strip malls in every direction... If people need more shopping there is always Fife which we seem to be emulating.

On the front page of the Olympian in Sunday, July 12th issue, the headlines...”Olympia Port Moving Again” with a picture of \$4 million of timber bound for Japan for pulp and paper....We are removing our trees (from forests not tree plantations) to export. We are exporting our real wealth (environment) for phantom wealth (money)...a very shortsighted and dangerous move. David Korten “Agenda for New Economy, Real Wealth vs. Phantom Wealth”

This Urban Growth area was approved in the early 1990’s as I understand..Haven’t we learned anything about the importance of preserving our natural environment or the direction we must take for our own well-being? If so, we would not be ravaging our environment and depleting our resources and trading trees for more shops and traffic....If there had to be an urban growth area...it should have been directed at an area with less environmental impact.

WOODLAND CREEK: We, who live on Woodland Creek, have many detailed ordinances and we respect our stream. I use no chemicals on my yard..YET you folks are clearcutting a quarter mile above the creek..proposing asphalt instead of the forest..in this very delicate Woodland Creek Watershed...This is nonsense and will have serious negative effects in many ways, including runoff, damage to streamirreversible.

WATER: Not enough of it...are we not looking at the direction in which we are headed...more droughts, fewer glaciers, a real water shortage...we are not equipped for all of this growth..and yet we talk about tapping aquifers for water...lowering stream levels...water tables which could interfere with the quality of our drinking water.

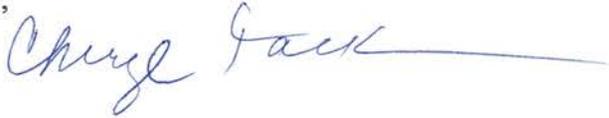
I am deeply saddened by this preposterous proposal...and only wish the short-sightedness could be seen now instead of in hind sight. Once this starts, there is no turning back no matter how much we wish we could.

At nearly 65 years of age...I have spent much of it studying communities and making recommendations. I spent 5 years looking for a place I could call home...moving from Seattle to Lacey, the city of trees, I thought I had found a city with my values and with an awareness of what is important in a community that works for its citizens. Now, I realized I made a misjudgement and also realize I do not have the energy nor the money to move again. I feel stuck...with air pollution, noise pollution, impolite and speeding drivers...The face of Lacey 8 years ago has been deeply scarred. The bottom line is greed and lack of proper planning. PROGRESS is defined as ‘betterment’...I see nothing about the Gateway project that is a betterment for our community or in any way progress.

My Masters degree is in cultural/economic/ecological anthropology. I have been witness to many plans and projects. If you wish to contact me, you may do so by telephone...491-4702. Cherylyou may leave a detailed message....I will also return any calls.

Sincerely,

Cheryl
M.A.

A handwritten signature in blue ink that reads "Cheryl Gack". The signature is written in a cursive style and is positioned to the right of the typed name "Cheryl M.A.".

Thank you for the comments, they are noted. The Growth Management Act requires that communities plan for projected growth. The act also requires that communities designate areas where growth is to occur within its boundaries and ensure transportation facilities, utilities and other services are in place to serve the project growth and protect and preserve sensitive areas such as wetlands, habitat and shorelines. Growth, whether by net migration or natural increase will occur and needs to be planned for otherwise it will sprawl further into our rural and natural resource lands. In response to the GMA, the City adopted a comprehensive plan (1994) to plan for future growth within the Lacey Urban Growth Area. Thurston County adopted the Lacey Urban Growth Area through collaboration with the City.

The purpose is to focus future growth to areas already characterized by urbanized growth in order to protect the rural and natural resources of the state. Subsequently, the City adopted regulations to implement the comprehensive plan. These include zoning to prescribe how property develops meeting the City's vision, a suite of critical areas ordinances that protect wetlands, shorelines, trees and habitat. As property is developed within Lacey, these sensitive areas are protected through buffers and/or mitigation prescribed by ordinances. Tree tracts and open space areas are set aside for both residential and commercial properties. Then the available land is developed under the community vision whether residential, commercial or industrial.

Traditional development has been single use - residential in one area, commercial in another and industrial still elsewhere. This type of development pattern necessitates longer vehicle trips, high cost of transit services with longer trips to low density/ridership area, higher cost to deliver service of utilities through longer pipe runs, etc. All of which has a strong impact on the environment and the City's cost of service. As described in the SEIS, the Lacey Gateway Town Center is to be a mixed use development where over time and redevelopment it can become a compact urban center where future citizens can live, work, shop in a walk able area with urban open spaces, green spaces, and trees. A place that will reduce vehicle miles travelled, lessen the cost of transit service through density, cost of utility services (through efficiency), and place future growth and density where it is appropriate and not in our rural or natural resource areas.

Comment Sheet

Lacey Gateway Town Center Planned Action DSEIS
Public Forum – July 1, 2009

Name: Duane L. Dishaw
Address: 4742 15th ave NE
Olympia WASH 98516
Telephone: (360) 491-6163



Add me to the notification list (circle one): Yes No

Comment(s) on Gateway Town Center DSEIS:

① as I look through your maps of your Gateway town center planned site, I see no land set aside for schools - N.T.H.S. schools will take care of this know. but a lot should be set aside for further new population increase.

② as we talked about the transportation of Sleeter Kinney Road / 15th avenue NE. all your plan Lacey is talk about a turn here. what about your maps & information you gave us at this town meeting, about you doing some thing about the street it self, more N.T.H.S.

Signature: _____ Date: _____

Continue comments on back if necessary

1. Identified impacts to North Thurston Public Schools were associated with the proposed 500 residential units. The impacts did not warrant the set aside of a school site but do warrant the payment of school impact fees. These fees will be paid through a voluntary mitigation agreement at the time of residential development.
2. The 15th Avenue/Draham corridor is within the jurisdiction of Thurston County. Thurston County identified impacts to the intersection of 15th NE and Sleater Kinney and requested mitigation to improve the intersection. Mitigation is required as requested by Thurston County. The 15th NE/Draham Road corridor is on the Thurston County 6-year Transportation Improvement Program.

Samra Seymour

From: Rick Walk
Sent: Thursday, July 16, 2009 8:14 AM
To: Samra Seymour
Subject: FW: Gateway Development

We received another comment.

From: Thelma Mosebar [mailto:tilind@hotmail.com]
Sent: Wednesday, July 15, 2009 6:43 PM
To: Rick Walk
Subject: Gateway Development

Mr. Walk:

RE: the supplemental environmental impact information published in the Olympian June 20.

I am dismayed over the city's intent to clearcut this property. If you can put in some 17,000 parking spaces, which means covering everything with asphalt (a substantial environmental impact regardless of what your planners might say), there is no reason not to leave at least some of the mature fir and other species of trees in park-like areas. Sacrificing even 500 parking spaces for a few green areas would beautify the property and retain at least some of the rural ambiance Lacey seems so committed to destroying in the Marvin Road area.

I recall an incident a few years back in Lacey (the original area) where a gentleman cut down a few (maybe 6) trees in his yard. That yard was near a major street. He was publicly and excessively criticized, and, if memory serves, fined for his transgression.

More recently, the city required Mr. Aho, a developer for 2 properties on Marvin Road, to leave natural areas in his development.

I, as a small tree grower, cannot clearcut my property. The Department of Natural Resources requires a few "seed" trees left standing, which is ridiculous since I plant as soon as the mature trees are felled. Contrast this with covering land with asphalt AND removing every tree. There is no comparison between these trees and the saplings you replace them with.

How is it that a city that claims to be a tree city, with it's little deciduous trees planted where beautiful, mature trees used to be, can get away with it?

The city claims to be interested in an ecologically friendly development. Consider that you can control the roots that would buckle pavement. The few trees with a lean or disease can be removed during development. There is little money in timber just now so there is no financial gain to harvest. It would not be necessary to have expensively manicured park-like areas; allow the natural plants like salal and others to beautify the ground such as one sees in state parks. Remember the tall and beautiful evergreen at the South Sound parking lot near Sears that has become a landmark gathering place for people to meet.

I urge Lacey to leave a few groups of these magnificent and mature trees. There is no reason to clear cut this property.

Lacey has already done enough to damage the environment of Hawks Prairie and Marvin Road with

7/16/2009

its incessant development. Retail space is already over-built.

Sincerely,
Thelma Mosebar
7232 40th Court NE
Olympia, WA 98516
360-701-3359

Insert movie times and more without leaving Hotmail®. See how.

7/16/2009

Thank you for your comments. Tree retention and replanting are components of the proposed Lacey Gateway Town Center. The City of Lacey Tree and Vegetation Protection and Preservation ordinance requires that a minimum of 5% of the site or 11.5 acres be set aside as tree tract(s). Mitigation measures also include a 40 foot tree and vegetation protection and landscape greenbelt between I-5 and the frontage road, and 50 feet of greenway between Britton Parkway and interior streets and other improvements.

Existing trees located within the Central greenway (as shown on the conceptual site map found throughout this document) will be retained and protected from development activities. A landscape plan will be required for the greenway identifying native and ornamental plantings that will supplement the understory and add tree density where needed.

Also, as the site plan is conceptual in nature, it may be possible to save individual or small clusters of trees in areas other than those identified in the mitigation measures (pg 3-24 – pg 3-25) at the time a final site plan is determined.