



Overview of Draft Responses to Key Issues Identified in DEIS Comments

WORKING DRAFT APRIL 19, 2019

Comment	Draft Response
Request to slow process	<p>The City slowed the environmental and planning process for Town Center, adding three more months to the State Environmental Policy Act (SEPA) process.</p> <p>The original project schedule anticipated the need to adopt code amendments ahead of Sound Transit environmental review, design, and permitting for the SR 522 bus rapid transit project.</p>
Difference between DEIS and the Subarea Plan (yet to be developed)	<p>The alternatives studied in the DEIS are not the proposed subarea plan for Town Center. This EIS process provides analysis and citizen engagement that informs the development of the plan.</p> <p>The purpose of the EIS is to study a range of potential impacts and identify ways those impacts can be mitigated based on analysis of a reasonable range of alternatives.</p>
Building heights allowed under the current zoning for Town Center	<p>The Town Center Framework Design Guidelines, adopted in 2006, specify the number of building stories allowed (up to five levels assuming bonus incentives), and the permitted heights for each floor, depending on use.</p> <p>The floor-to-floor heights allowed by the framework design guidelines are as follows:</p> <ul style="list-style-type: none"> • Grocery 20 feet • Retail 18 feet • Office, Live/Work and Service 12 feet • Residential 10 feet
Density allowed under the current zoning for Town Center	<p>The current planning and land use regulations of the Lake Forest Park Municipal Code, which include the Framework Design Guidelines for Town Center, allow for multi-family housing and increased density to be built at the Town Center. This also could include increasing the amount of commercial or office space at Town Center, along with adding residential units. Density is regulated by form rather than prescription, which means that the current regulations do not set a limit on dwelling units/acre, only on building height.</p>
The “No Action” Alternative is not a “No Change” Alternative	<p>Alternative 1 represents a level of redevelopment that could be implemented under existing code regulations. It is a baseline scenario that could occur if no amendments are made to the existing zoning code. Changes to the Town Center could occur under this alternative.</p> <p>The State Environmental Policy Act (SEPA) requires that a reasonable range of alternatives be analyzed. According to the Washington Administrative Code (WAC) 197-11-440 (5) (b) (ii) a “no-action” alternative shall be evaluated and compared to the alternatives.</p>
Development of Preferred Alternative	<p>The preferred alternative will be developed by the City Council in the framework of the DEIS analysis with input from the Planning Commission.</p>
Infrastructure and traffic	<p>As analyzed in Chapter 4 of the DEIS, significant unavoidable adverse environmental impacts would not be anticipated related to transportation, utilities, and public services with implementation of mitigation measures.</p>

Lyon Creek	There is the potential for amendments to the Lake Forest Park Municipal Code implemented as an outcome of this EIS process to include greater protections for the Lyon Creek corridor and to incentivize expanded buffers along the creek as well as enhancements (native vegetation plantings, more trees, and other elements beneficial to fish and wildlife habitat in the stream corridor).
Trees	There are minimal existing trees within the interior of the Town Center site under existing conditions, and redevelopment would be required to add a significant number of trees and landscaping throughout the site—both under current code conditions and amended code provisions.
Third Place Commons	Future redevelopment plans will determine where Third Place Commons will be located. The City understands the importance of the Commons to the Lake Forest Park community and is committed to ensuring the ability of the Commons to continue serving as the community's gathering place.
Basis for Alternative 1	<p>The No Action alternative must base its analysis on a reasonable assumption about what could happen in the absence of a regulatory change.</p> <p>The 700 units assumed and studied under Alternative 1 are based on the possibility of adding multi-family buildings (up to five levels with 4/1 construction) in the northern portion of the Town Center as well as some new commercial/retail spaces in the ground floors of these buildings, while also replacing some of the existing retail/commercial (the northern "arm" of the Town Center shopping complex). In addition, multi-family units were also assumed as part of the redevelopment of the existing office building and parking area northwest of City Hall, with multi-family use in the upper floors of a commuter parking structure.</p> <p>In addition to the 700 units assumed and studied under Alternative 1, the current land use regulations at Town Center would allow redevelopment in the southern surface parking area, where it is estimated that approximately 300 multi-family units could be developed with the Town Center shopping area remaining intact.</p>
Water system-water quality considerations; artesian well fields	Redevelopment at Town Center would not contaminate the artesian water source due to the water source's location 200 feet above the Town Center site and due to the numerous strict regulatory and wellhead protection controls that are designed to protect groundwater sources.
Water system capacity to serve fire flow of redevelopment	The FEIS will provide clarifying information related to the expected fire flow capacities needed to serve future redevelopment, and these are generally below or within the capacity level at the Lake Forest Park Water District anticipates the system could serve.
Stormwater/surface water runoff management and surface water quality	Redevelopment at Town Center would improve stormwater management over current conditions and provide beneficial opportunities to improve stormwater quality through a variety of treatments. Any redevelopment would be subject to the most current stringent regulations related to stormwater management as applicable under the King County Stormwater Manual adopted by the City Council.
Comments pertaining to the location of a commuter parking structure	Sound Transit has not formally identified the location of the parking structure.

CHAPTER 2.0 DESCRIPTION OF ALTERNATIVES

Table 2.1 Land Use and Redevelopment Assumptions Related to Each Alternative

TYPES OF LAND USES AND SPACES		POTENTIAL REDEVELOPMENT SCENARIOS FOR ANALYSIS			
		Alt. 1 - No Action	Alt. 2 – Varied Height and Form ³	Alt. 3 – Uniform Height and Form ³	Preferred Alternative
Non-Residential Gross Square Footage (GSF):	Existing Conditions				
Commercial/Retail Space	185,000	175,000 ¹	125,000	200,000	125,000 to 185,000
Medical/Dental Office	24,000	24,000 ²	25,000	50,000	25,000
Bank	3,031	3,031	0 ⁴	0 ⁴	0 ⁴
Windermere Real Estate Office Building ⁵	8,000	8,000	8,000	8,000	8,000
Starbucks Coffee ⁵	2,500	2,500	2,500	2,500	2,500
Arco Gas Station ⁵	10 pumps	10 pumps	10 pumps	10 pumps	10 pumps
Residential/Multi-Family Housing (Units):		Up to 700 ¹	Up to 1,200	Up to 1,500	TBD
Commuter Park and ride Structure/Some (Shared Use Assumed for Off-Commute Hours/Weekends)	0	300 Spaces for Commuters	300 Spaces for Commuters 100 Spaces for Commercial, City/Public Use Total = 400	300 Spaces for Commuters 200 Spaces for Commercial, City/Public use Total = 500	300 Spaces for Commuters TBD
Civic Space and Public Uses (GSF):					
City Hall	20,000	20,000	32,000 ⁶	32,000 ⁶	32,000 ⁶
Indoor Civic/Community Space/Space for Public Meetings and Events	10,000 ⁷	10,000 ⁷	20,000 ⁸	20,000 ⁸	20,000 ⁸
Northshore Fire Station 57	8,000	8,000	8,000 ⁹	8,000 ⁹	8,000 ⁹
King County Library LFP Branch	5,965	5,965	5,965 ⁹	5,965 ⁹	5,965 ⁹

Table Notes:

- 1 This GSF and multi-family unit count represents only one potential redevelopment scenario. More GSF of commercial/retail and medical/dental office square footage could be developed than this under current planning and land use regulations (see Table 2.2).
- 2 Medical/dental office uses would relocate on site with development of new park and ride structure.
- 3 Alternatives 2 and 3 assume that most all of the current Town Center commercial/retail complex would redevelop incrementally in phases over time; current medical/office space also would redevelop into new park and ride structure and medical/dental office use would occur in other locations on site.

CHAPTER 2.0 DESCRIPTION OF ALTERNATIVES

- 4 Assumes bank site would be redeveloped; use could relocate to a new space on site.
- 5 No changes assumed to these sites under any of the alternatives.
- 6 Assumes City Hall and Lake Forest Park Police would expand on site to meet higher service demand.
- 7 Approximate size of current Third Place Commons area; separated in table for reference but counted as part of the topline commercial space under existing conditions and in Alternative 1 and as part of civic space in Alternatives 2 and 3.
- 8 Assumes new expanded indoor commons/community space; preserving the function of Third Place Commons and providing additional meeting facilities and multi-generational services.
- 9 Fire and emergency services and facilities, as well as potentially library and other human services would need to increase to meet higher service demand; may require additional GSF/facilities (to be determined as growth occurs). Note while listed separately for reference purposes, the analysis assumes the library space is part of the topline commercial space number.

Table 2.2 Land Use and Zoning Assumptions for All Alternatives

	ALTERNATIVE 1—NO ACTION/EXISTING REGULATIONS			ALTERNATIVE 2 VARIED HEIGHT AND FORM	ALTERNATIVE 3 UNIFORM HEIGHT AND FORM	PREFERRED ALTERNATIVE
	Current Town Center (TC) Zoning, Chapter 18.42 LFP MC	2005 Town Center Framework Design Guidelines—Baseline	2005 Bonus Guidelines	Code Amendments and New Design Standards/Guidelines	Code Amendments and New Design Standards/Guidelines	Code Amendments and New Design Standards/Guidelines
Uses	General commercial and low density residential (but see rows below for density changes under Design Guidelines and Bonus Guidelines)	Mixed-use (horizontal or vertical) and must include Residential as a component of the overall site redevelopment	Same as baseline guidelines	Mixed-use (vertical or horizontal) commercial/retail, medical/dental office, civic/community, and multi-family residential uses across the site; master planning would include multi-family residential as a component of plan up to 1,200 units analyzed	Mixed-use (mostly vertical assumed) commercial/retail, medical/dental office, and civic/community, and multi-family residential uses across the site; master planning would include multi-family residential as a component of plan up to 1,500 units analyzed	Potential sub-district approach to predominant uses (residential in north; commercial/mixed use in south; civic in west triangle)?
Height Limits—Residential/Mixed-use	40-foot height	48 to 54-foot height (four levels total/3 over 1)	60- to 66-foot height (2005 baseline guidelines plus one additional bonus level for five levels total/4 over 1)	65-foot height to highest occupied finish floor level/75-foot height to base roofline level See bonus height assumptions under incentives below	75-foot height to highest occupied finish floor level/85-foot height to base roofline level	TBD
Height Limits—Commercial	30-foot height	See mixed-use height limit	See mixed-use bonus height	For mixed-use buildings, same as Residential/Mixed-use above	For mixed-use buildings, same as Residential/Mixed-use above	TBD
Floor Heights	Grocery 20 feet Retail 18 feet Office, Live/Work, Service 12 feet Residential 10 feet	Same	Same	Maximum ground floor height of 20 feet for uses approved through development agreement; other floor level heights to be determined through development agreement and design review process. This EIS analyzes the potential for second levels of podium buildings to be designed to look like the levels above rather than the ground level and to be set back from first levels per EIS analysis—see Chapter 4.	Maximum ground floor height of 20 feet for uses approved through development agreement; other floor level heights to be determined through development agreement and design review process. This EIS analyzes the potential for second levels of podium buildings to be designed to look like the levels above rather than the ground level and to be set back from first levels per EIS analysis—see Chapter 4.	TBD

Table 2.2 Land Use and Zoning Assumptions for All Alternatives (Continued)

	ALTERNATIVE 1—NO ACTION/EXISTING REGULATIONS			ALTERNATIVE 2 VARIED HEIGHT AND FORM	ALTERNATIVE 3 UNIFORM HEIGHT AND FORM	PREFERRED ALTERNATIVE
	Current Town Center (TC) Zoning, Chapter 18.42 LFP MC	2005 Town Center Framework Design Guidelines—Baseline Standards	2005 Bonus Guidelines	Code Amendments and New Design Standards/Guidelines	Code Amendments and New Design Standards/Guidelines	Code Amendments and New Design Standards/Guidelines
Density—Residential	Maximum of 7 dwelling units per acre.	Density shall be determined by form and other provisions related to setbacks, heights, etc.	Baseline standards plus one additional level.	Form-based design intended; specific provisions related to density may be an outcome of this EIS analysis.	Form-based design intended; specific provisions related to density may be an outcome of this EIS analysis.	TBD
Density—Commercial	Individual uses of less than 60,000 GSF allowed outright; non-residential uses between 60,000 and 100,000 GSF allowed through Conditional Use Permit.	No single store footprint should exceed 60,000 GSF.	Same as baseline guidelines.	No single use (commercial or office) footprint should exceed 50,000 GSF on one level; conditional use permit required for 50,000 to 75,000 GSF single uses (max. 75,000 GSF).	No single use (commercial or office) footprint should exceed 50,000 GSF on one level; conditional use permit required for 50,000 to 75,000 GSF single uses (max. 75,000 GSF).	TBD
Setbacks and Edge Conditions	20-foot front, side, and rear yard setbacks for all property lines, including individually owned parcels.	Buildings adjacent to public realm in either public or private ownership should incorporate 12- to 16-foot setback of the 3 rd floor regardless of use.	Same as baseline guidelines.	Setbacks and edge condition parameters are under study in this EIS (see Chapter 4), to be determined based on the outcomes of analysis Building step backs may be considered for buildings adjacent to public realm and certain locations on the site (such as 12- to 16-foot step backs of the 3 rd floor similar to 2005 Framework Design Guidelines), but also may consider potential for flexibility through development agreement and design review process	Setbacks and edge condition parameters are under study in this EIS (see Chapter 4), to be determined based on the outcomes of analysis Building step backs may be considered for buildings adjacent to public realm and certain locations on the site (such as 12- to 16-foot step backs of the 3 rd floor similar to 2005 Framework Design Guidelines), but also may consider potential for flexibility through development agreement and design review process	TBD
Open Space, Site Interior Design, and Pedestrian Connectivity	Existing footprint of buildings, structures, and pavement can be retained in redevelopment (underlying Critical Areas ordinance provision). Land coverage per lot provision in 18.42.080 does not align with current conditions or	Enhance Lyon Creek and habitat. Provide 15,000 SF of contiguous flexible open space with 7,500 SF of this as flexible interior open space (Third Place Commons concept). Provide numerous seating opportunities along pedestrian ways and “eyes on” design of	Baseline standards with increase in size of indoor and outdoor open space areas and added public amenities (water features, public art, etc.). Site interior design/pedestrian connectivity: Same as baseline standards.	Existing footprint of buildings, structures, and pavement could be retained in redevelopment (underlying Critical Areas ordinance provision) This EIS analyzes the potential to enhance Lyon Creek and associated habitat and to provide wider setbacks/buffers from the	Existing footprint of buildings, structures, and pavement could be retained in redevelopment (underlying Critical Areas ordinance provision) This EIS analyzes the potential to enhance Lyon Creek and associated habitat and to provide wider setbacks/buffers from the	TBD

	<p>allowed density and redevelopment envelope.</p> <p>No specific standards related to site interior design and pedestrian connectivity.</p>	<p>surrounding buildings and spaces to public realm.</p> <p>Site interior design/pedestrian connectivity: Create visual connections between all public realm spaces and buildings.</p> <p>Provide 200-250-foot grid of pedestrian walkways and “pedestrian first” design and east-west connection along Lyon Creek on site.</p> <p>Enhanced pedestrian connection on Ballinger Way (separated from street where reasonably achievable).</p>		<p>creek centerline than under current conditions. See Chapter 4.</p> <p>The potential to preserve the function of a Third Place Commons concept through redevelopment is under study in this EIS – see Chapter 4. Potential impervious surface area and open space parameters related to commercial and residential uses are under study in this EIS – see Chapter 4.</p> <p>Provision of pedestrian seating, furnishings, lighting, visual connectivity and “eyes on” pedestrian- and transit-oriented design, public amenities such as water features, public art, and other elements would all be integrated into new Town Center Design Standards and Guidelines as part of LFPMC amendments.</p> <p>The provision of pedestrian connectivity at regular intervals north-south and east-west within the site and around the perimeter of Town Center is under study in this EIS; outcomes would help to shape parameters of LFPMC amendments and design standards and guidelines.</p>	<p>creek centerline than under current conditions. See Chapter 4.</p> <p>The potential to preserve the function of a Third Place Commons concept through redevelopment is under study in this EIS – see Chapter 4. Potential impervious surface area and open space parameters related to commercial and residential uses are under study in this EIS – see Chapter 4.</p> <p>Provision of pedestrian seating, furnishings, lighting, visual connectivity and “eyes on” pedestrian- and transit-oriented design, public amenities such as water features, public art, and other elements would all be integrated into new Town Center Design Standards and Guidelines as part of LFPMC amendments.</p> <p>The provision of pedestrian connectivity at regular intervals north-south and east-west within the site and around the perimeter of Town Center is under study in this EIS; outcomes would help to shape parameters of LFPMC amendments and design standards and guidelines.</p>	
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Table 2.2 Land Use and Zoning Assumptions—All Alternatives (Continued)

	ALTERNATIVE 1—NO ACTION/EXISTING REGULATIONS			ALTERNATIVE 2 VARIED HEIGHT AND FORM	ALTERNATIVE 3 UNIFORM HEIGHT AND FORM	PREFERRED ALTERNATIVE
	Current Town Center (TC) Zoning, Chapter 18.42 LFP MC	2005 Town Center Framework Design Guidelines—Baseline	2005 Bonus Guidelines	Code Amendments and New Design Standards/Guidelines	Code Amendments and New Design Standards/Guidelines	Code Amendments and New Design Standards/Guidelines
Bicycle	No specific standards.	Provide clear route of travel between crosswalk to Burke Gilman Trail and through site. Provide weather protected bike racks/storage within multi-family residential areas and at bus stops.	Same as baseline guidelines.	The provision of bicycle facilities including weather protected parking and storage areas and design standards for bicycle connectivity within the site and around the perimeter of Town Center is under study in this EIS; outcomes would help to shape parameters of LFPMC amendments and design standards and guidelines.	The provision of bicycle facilities including weather protected parking and storage areas and design standards for bicycle connectivity within the site and around the perimeter of Town Center is under study in this EIS; outcomes would help to shape parameters of LFPMC amendments and design standards and guidelines.	TBD
Transit	No specific standards.	Provide well-lit pedestrian ways to bus shelters and provide information kiosks on site.	Same as baseline guidelines.	Transit-oriented design provisions are proposed to guide redevelopment and specific requirements for lighting of pedestrian ways, connectivity to transit, weather protection, information and wayfinding, and other elements would be integrated into the Town Center Design Standards and Guidelines.	Transit-oriented design provisions are proposed to guide redevelopment and specific requirements for lighting of pedestrian ways, connectivity to transit, weather protection, information and wayfinding, and other elements would be integrated into the Town Center Design Standards and Guidelines.	TBD
Vehicular Routes	Other provisions of the LFPMC and basic engineering standards apply.	Lengthen distance between access points and internal drive aisles. Traffic calming/design to deter short cutting of intersections.	Same as baseline guidelines.	Vehicular circulation parameters internal to the site, access points, and intersections in the proximity of Town Center are under study in this EIS—see Chapter 4. Specific design provisions related to lengthening of distances between access points and internal drive aisles, provision of traffic calming and other design measures to deter short cutting of intersections, as well as other design treatments and necessary improvements to support implementation of the preferred	Vehicular circulation parameters internal to the site, access points, and intersections in the proximity of Town Center are under study in this EIS—see Chapter 4. Specific design provisions related to lengthening of distances between access points and internal drive aisles, provision of traffic calming and other design measures to deter short cutting of intersections, as well as other design treatments and necessary improvements to support implementation of the preferred	TBD

				<p>alternative would be integrated into the Town Center Plan and LFPMC amendments as applicable.</p> <p>Consistent with pedestrian-first/pedestrian-oriented design, this EIS analyzes the potential to create a better defined internal street network with sidewalks, on street parking, curb extensions/bulb-outs, and other features that would support function similarly to public streets (even though access ways may continue to be privately maintained)—see Chapter 4.</p>	<p>alternative would be integrated into the Town Center Plan and LFPMC amendments as applicable.</p> <p>Consistent with pedestrian-first/pedestrian-oriented design, this EIS analyzes the potential to create a better defined internal street network with sidewalks, on street parking, curb extensions/bulb-outs, and other features that would support function similarly to public streets (even though access ways may continue to be privately maintained)—see Chapter 4.</p>	
Parking—Residential	1.5 spaces per unit	Alternative off-street parking ratios and feasibility of shared parking to be considered	Baseline standards with increased underground/below grade parking	Right-sizing of parking is analyzed as part of this EIS, as well as the potential for alternative parking ratios and shared parking arrangements—see Chapter 4.	Right-sizing of parking is analyzed as part of this EIS, as well as the potential for alternative parking ratios and shared parking arrangements—see Chapter 4.	<p>TBD</p> <p>Residential of 1.5 spaces per unit could be retained; or could reduce as incentive given TOD.</p>
Parking--Commercial	5 spaces per 1,000 GSF	Same as above.	Same as above.	<p>Parking demand can be determined by future study with each redevelopment application and should assume and confirm the formula for shared parking across the site.</p> <p>Increased height limit would make provision of underground/below grade parking and structured parking more feasible.</p>	<p>Parking demand can be determined by future study with each redevelopment application and should assume and confirm the formula for shared parking across the site.</p> <p>Increased height limit would make provision of underground/below grade parking and structured parking more feasible.</p>	<p>TBD</p> <p>Study of 4 spaces/1,000 GSF for commercial use fits the King County Right Size Parking model.</p> <p>Could allow flexibility with further analysis/study by applicant on a case by case basis.</p>
Sustainability/Green Building	Building and Energy Code provisions.	LEED, Built Green, and Green Globes provisions.	Additional LEED, Built Green, and Green Globes provisions.	To be determined based on outcomes of EIS process.	To be determined based on outcomes of EIS process.	TBD
Housing Choice and Affordability	No specific housing affordability provisions.	No specific housing affordability provisions.	No specific housing affordability provisions.	Consistent with adopted plans and policies the potential for providing expanded housing choices at different levels of affordability as part of	Consistent with adopted plans and policies the potential for providing expanded housing choices at different levels of affordability as part of	TBD

				redevelopment is addressed in this EIS, see Chapter 4	redevelopment is addressed in this EIS, see Chapter 4	
Incentives for Redevelopment	10-foot height increase for mixed-use buildings.	(1) Additional height and density—see above; (2) Proactive permitting process; (3) design flexibility; (4) market based standards.	Same as baseline guidelines; potential to add another level/more density with amenities and compliance with edge conditions and other standards.			TBD

TO: Lake Forest Park Planning Commission
FROM: Lake Forest Park City Council Chair and Vice Chair
DATE: April 19, 2019
RE: Request for Study by Planning Commission

The Lake Forest Park City Council is moving from our "listen and learn" phase of our part of the Town Center Planning Process into considerations regarding the Preferred Alternate as part of the required SEPA process. We want to move forward with the best possible tools to inform our decisions.

To that end, the Council recognizes the significant amount of work already done by the Planning Commission on the initial code considerations, including the design guidelines. Your evaluations and recommendations are critical to this process.

Therefore, we request that you begin to look at certain elements we are considering for the Preferred Alternative through the lens of the Comprehensive Plan and the Vision, and then take another look at your preliminary code revisions.

As you know, the Comprehensive Plan is likely the most important work that the Commission is responsible for initiating and forms the foundation for your land use recommendations. It is well grounded in broad public outreach and updated on a regular basis.

Quote from MRSC: *"Comprehensive plans are the centerpiece of local planning efforts. A comprehensive plan articulates a series of goals, objectives, policies, actions, and standards that are intended to guide the day-to-day decisions of elected officials and local government staff."*

The Vision also represents broad public outreach with a specific focus on the Town Center. It was intentionally written with policy statements, consistent with the structure of the Comprehensive Plan. The Council accepted the work, but did not adopt the policies, as the specific language may change as we are continuing to work through the process.

Your feedback on the consistency, or lack thereof, of these documents and draft code revisions will be an invaluable tool for us as we move forward.

The Council is encouraged by our increased communications with the Planning Commission and grateful for your commitment to our remarkable city. We look forward to setting additional joint sessions as the city's work continues toward completing plans, codes and design guidelines.

Elements to be considered by the Council in the Preferred Alternative Process

Elements

- Land Uses
-
- Square Footages
-
- Height Limits
-
- Floor Heights
-
- Density
-
- Setbacks and Edge Conditions
-
- Open Space
-
- Site Interior Design, and Pedestrian Connections
-
- Bicycle
-
- Transit
-
- Vehicular Routes
-
- Parking—Residential and Commercial
-
- Sustainability/Green Building
-
- Housing Choice and Affordability
-
- Incentives for Redevelopment

The Preferred Alternative in the FEIS will need to include the following parameters or assumptions for the analysis.