



# Addendum

To the Downtown Lakewood Plan and Planned Action Final Environmental Impact Statement  
Final EIS issued July 20, 2018 | Addendum Issued: September 26, 2018

<b>Purpose and Background .....</b>	<b>1</b>
Proposal.....	1
SEPA Process.....	2
Downtown Concepts and Alternatives.....	2
<b>City Council Preferred Alternative and Refinements .....</b>	<b>6</b>
Stand-Alone Multi-Family Residential Location and Density.....	6
Mixed Use Definition.....	9
Residential Uses – Policy LU-19 .....	9
Gas Stations.....	10
<b>Comparison of Alternatives .....</b>	<b>10</b>
<b>Preparer.....</b>	<b>11</b>

## Purpose and Background

### PROPOSAL

The City of Lakewood commissioned the Lakewood Downtown Plan, considered a subarea plan under the Growth Management Act, to guide redevelopment of its Central Business District (CBD) into a rich urban area with civic amenities, walkable streets, and a mix of uses including housing, entertainment, restaurants, and retail. The plan builds on a foundation of current plans and programs and:

- Describes a vision, land use and design, gathering places, infrastructure investments, and other action strategies for Lakewood’s central business district or “Downtown”.
- Amends Comprehensive Plan land use, policy, and capital facility plan elements.
- Creates new hybrid form-based zoning standards.
- Provides upfront environmental review through a Planned Action consistent with RCW 43.21c.440 and SEPA rules in WAC 197-11 that are anticipated to help bring about desired change and development.

## SEPA PROCESS

The Downtown Lakewood Plan and Planned Action Final Environmental Impact Statement (Final EIS) was issued July 20, 2018. It addressed several alternatives including a Planning Commission Preferred Alternative. Since receiving Planning Commission recommendations in summer 2018, the City Council held a public hearing and deliberated. The City Council has provided direction on a City Council Preferred Alternative.

The City Council Preferred Alternative was reviewed in an Addendum dated September 10, 2018. This second Addendum provides a description of additional potential refinements to the City Council Preferred Alternative and how the changes fit the range of Final EIS alternatives.

This addendum provides information about the proposed action to adopt a Downtown Plan and associated Downtown Development Code and Planned Action Ordinance, but the Addendum does not substantially change the analysis of significant impacts and alternatives in the Final EIS consistent with WAC 197-11-600 (4)(c). This addendum has been circulated to the recipients of the final EIS per WAC 197-11-625.

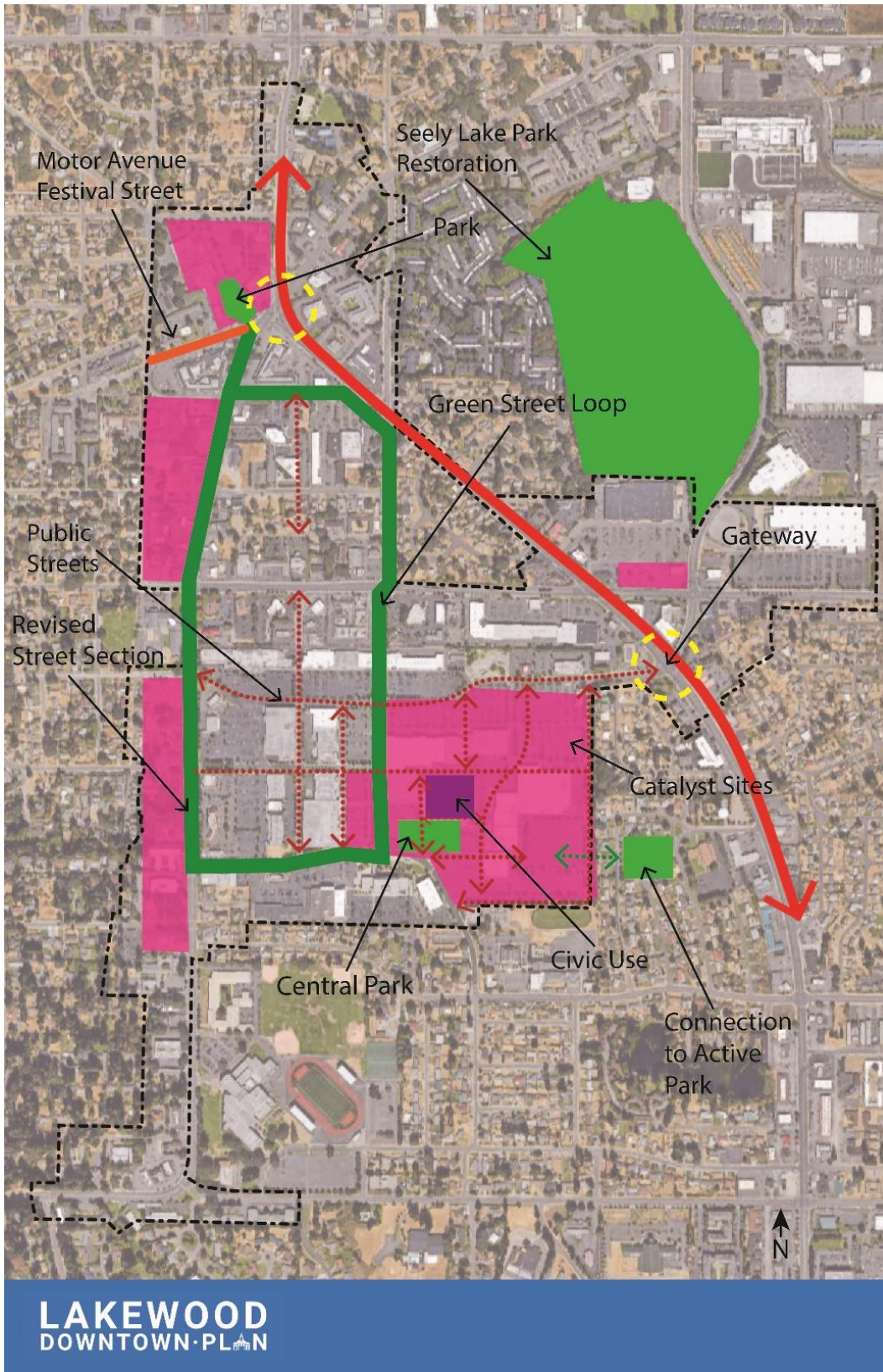
## DOWNTOWN CONCEPTS AND ALTERNATIVES

The Downtown Plan proposes key investments and changes:

- 2 to 4-acre park near City Hall
- Green street loop with improved pedestrian and bicycle facilities
- Site for additional civic uses near City Hall
- Improved public street grid in the Towne Center
- Gateways along major arterials at the entrance to Downtown
- Revised plan line on Gravelly Lake Drive
- Catalyst sites for redevelopment
- Connection to Active Park
- Motor Avenue Improvements
- Seeley Lake Park restoration

These concepts are illustrated in the map below. EIS alternatives vary implementation of these features.

**Exhibit 1. Downtown Lakewood Concepts Revised**



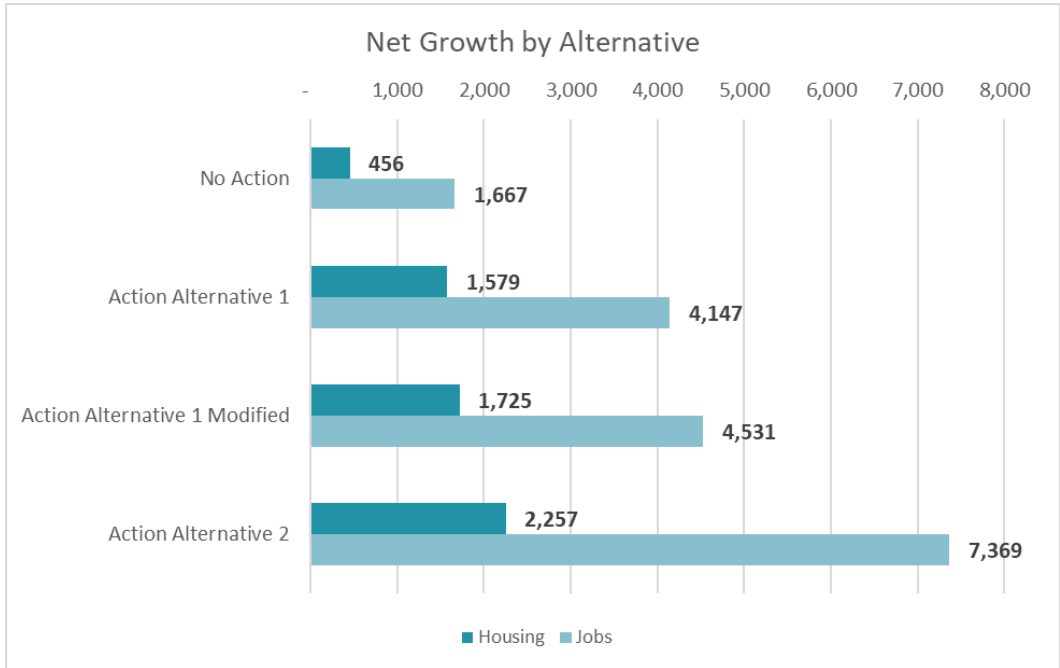
Source: Framework, 2018

Four alternatives were compared in the Final EIS, including:

- **No Action**, a SEPA Required Alternative. This alternative assumes growth according to current trends and under current City Plans and development regulations. The No Action Alternative would assume the least housing and jobs are added based on trends. There would be no additional public investments in parks or stormwater infrastructure. Current transportation plans would be implemented, the number of public streets would not increase, and block size would not decrease. The Subarea Plan and associated hybrid form-based code and Planned Action Ordinance would not be adopted.
- **Action Alternative 1**, assuming a moderate level of development based on targeted infrastructure investments and plan and code changes. New housing would be added at more than three times the level of the No Action Alternative, given a greater density allowed. Jobs would more than double the level of the No Action Alternative. The job mix would see a greater number of office or entrepreneurial businesses, and households that want to live, work, shop, and play in the same area. The increased growth in housing and jobs is spurred by a greater investment in multi-modal transportation improvements, parks and gathering spaces, and environmental amenities and stormwater management. Infill and integration of mixed-use development would occur on catalyst sites.
- **Modified Alternative 1**, which slightly modifies Action Alternative 1 densities and jobs to 1,725 dwellings and 4,531 jobs to ensure consistency with Regional Growth Center activity requirements. This is considered Phase 1 growth. The increased growth in housing and jobs is spurred by a greater investment in multi-modal transportation improvements, parks and gathering spaces, and environmental amenities and stormwater management. Investments include a green loop of street and trail improvements, more public streets, and a 2-acre central park. If more growth occurs in Phase 2 similar to Action Alternative 2, additional capital investments in transportation and parks would be made. The Downtown Subarea Plan would be adopted together with consistency edits to the Comprehensive Plan. A hybrid form-based code would be adopted. A Planned Action Ordinance would be adopted.
- **Action Alternative 2**, assuming a high level of growth studied including five times the housing and jobs compared with No Action. Alternative 2 is like Alternative 1 except that larger investments in transportation connections, parks, and green infrastructure would be made. The plan and code would allow the greatest density and heights up to similar levels as the current code (90 feet). More redevelopment of catalyst sites into mixed use formats would occur. The Planning Commission recommended Action Alternative 2 as a preferred alternative. As recommended by the Planning Commission the Downtown Subarea Plan would be adopted together with consistency edits to the Comprehensive Plan. A hybrid form-based code would be adopted. A Planned Action Ordinance would be adopted.

Due to differences in growth and density, the alternative growth levels would vary as illustrated below.

**Exhibit 2. Growth Level Comparison by Alternative**



Source: BERK, 2018

# City Council Preferred Alternative and Refinements

Typical of a mixed-use downtown, desired uses include commercial retail and office, residential, and civic. Currently, the City allows both mixed use and stand-alone residential uses in the CBD. However, commercial uses predominate and there is little residential use in Downtown Lakewood currently.

The proposed Downtown Plan and Downtown Development Code together with investments in parks, the Green Street Loop, and other multimodal transportation improvements, are designed to attract private investment in housing and offices as well as retail. The changing nature of retail with more activity occurring online is transforming big box shopping centers and malls into central gathering places to play, live, shop, and work. These trends are noted in the CBD Assessment and in Developers forums and Charette results available at the Downtown Plan website (<https://www.lakewooddowntownplan.org/>), as well as in a memo from Becky Newton, Lakewood Economic Development Manager presented to the City Council at the July 23, 2018 study session.

To date, the Downtown Plan and Development Code would allow a range of uses that can be vertically or horizontally mixed. If a stand-alone residential use is in proximity to the predominant commercial use it is helping to create a mixed-use neighborhood in a horizontal fashion. Stand-alone residential use may be an appropriate transition from mixed use or commercial areas to lower density uses outside of the Town Center area (e.g. townhomes).

The City Council's Preferred Alternative is based on Action Alternative 2 with refinements to allowed uses considered in this Addendum. Options described below vary in their approach to promote mixed uses and allow in a limited manner stand-alone residential uses; however, the intent for mixed use development in a multi-modal well-designed environment is maintained.

## STAND-ALONE MULTI-FAMILY RESIDENTIAL LOCATION AND DENSITY

### No Action – Current Code

The current CBD zone allows for Level 2 or Level 3 multifamily uses. These are, respectively, stand-alone multifamily with 7 or more attached or detached dwellings or developments with a mix of residential and commercial uses at 50 percent of the square footage. Multifamily uses may be horizontally or vertically mixed with commercial uses.

Since 2001, City records show two prior stand-alone multifamily developments built per the current code; one development is pending. No mixed use residential commercial developments have been developed since 2001.

### Final EIS July 2018 Planning Commission Proposals

The proposed code included in Final EIS appendices did not prohibit stand-alone multifamily uses but did require for nearly all frontage types a minimum ground floor height of 16 feet, which promotes the opportunity for commercial uses.

### Addendum 1 September 2018 City Council Preferred Alternative Proposals

Per the September 10, 2018 Addendum, the draft code proposed that stand-alone multifamily residential uses that are more than a quarter mile (1,320 feet) from the Colonial Overlay or Town Center Incentive Overlay districts would be prohibited, except when the opportunity for future commercial use is

part of the development design. Densities of 100 units per acre would be allowed for mixed-use residential development, or when residential is added to a commercial site, or if a first floor is provided at a height of 16 feet allowing future commercial use. Stand-alone multifamily that does not meet these mixed use or design requirements would be allowed a lower density of 80 units per acre.

## Addendum 2 September 2018 Additional Options

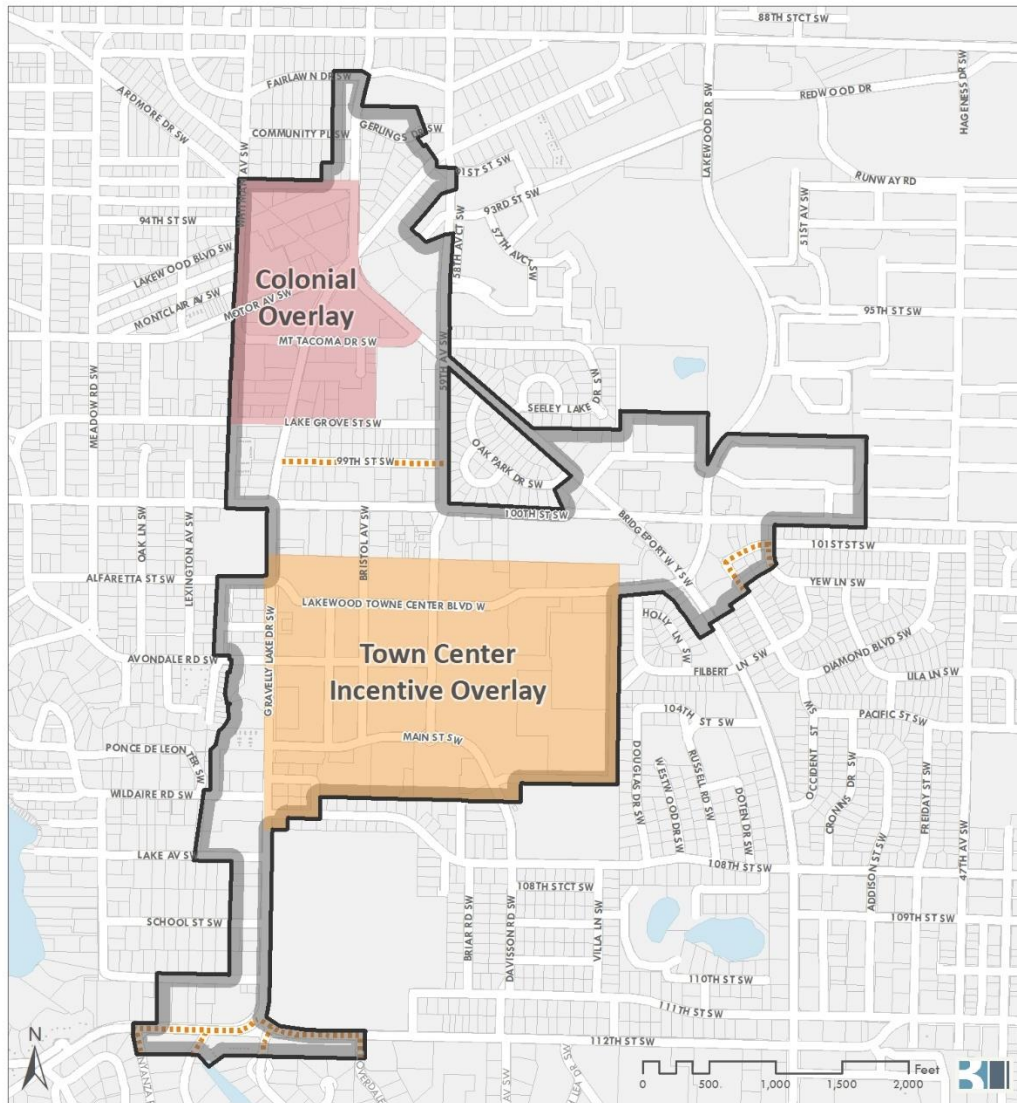
The City is considering options that are in the range of the current code, which does not limit stand-alone residential uses, and the code proposal in the Final EIS, which would have required a minimum ground floor height of 16 feet to promote commercial opportunities for nearly every frontage type in the Downtown.

**Option 1 – Limit in Overlays:** The City could prohibit stand-alone residential within the Colonial Overlay or Town Center Overlay. See Exhibit 3 below.

**Option 2 – Limit along Certain Streets:** The City could require a minimum separation of 400 feet between stand-alone residential projects within the areas of the Downtown Subarea outside of the Towne Center and Colonial Overlays. The 400-foot distance comes from the Downtown Plan effort to create new city blocks in the future. The locations of these projects would be based on a first-in-time application process. Based on City estimates, this could allow between 10 and 18 stand-alone multifamily development projects. These projects would not be concentrated, but evenly dispersed throughout the Downtown Plan.

**Option 3 – Require Mixed Use in order to Receive Multifamily Tax Exemption:** With this proposal, the City would amend LMC Chapter 3.64 through separate legislative action to update the City’s residential target area standards and guidelines. Changes would require a Downtown project requesting a multifamily tax exemption to include mixed use development. This option could be combined with other options.

**Exhibit 3. Overlay Districts Map – City Council Preferred**



**LEGEND**

- Colonial Overlay
- Town Center Incentive Overlay
- Transition Overlay
- Lakewood CBD Boundary
- Low-impact Mixed Use
- Roads
- Waterbody
- Parcels

Source: BERK, 2018



## Dwelling Density and Capacity

Alternative 2 in the EIS assumed 100 units per acre and a capacity for 2,257 units on catalyst and redevelopment sites.

- As of Addendum 1, the draft code would allow 100 units per acre if residential development is part of a mixed-use format and 80 units per acre if residential is in a stand-alone format.
- Options evaluated in Addendum 2 also allow 100 units per acre for mixed use development, a lower density for stand-alone residential, and greater density with affordable mixed-use development. There would be more areas where mixed use is required, allowing for the higher densities.

Achievement of Alternative 2 dwellings is possible under the range of options considered in the addenda. This is due to the incentives in the Towne Center Overlay allowing no density limit except for Planned Action dwelling unit bank cap, as well as the ability to apply for density incentives in much of the Downtown for the provision of affordable housing.

## MIXED USE DEFINITION

The City anticipates adding a definition of “mixed use development” that differs from Level 3 multifamily. It would be a separate definition and could read as follows:

*“Mixed use development” means the development of a parcel or structure with one or more different land uses, such as a combination of residential, office, retail, public, or entertainment in a single or physically integrated group of structures. Mixed use is characterized by: 1) Complementary land uses – land uses that are at least compatible and, preferably, work together for mutual benefit (e.g., personal commercial services that serve adjacent residences); and 2) Convenient pedestrian connections.*

This definition fits the vision, goals, and strategies of the draft Downtown Plan and the range of alternatives and land uses in the EIS. No environmental impacts are anticipated.

## RESIDENTIAL USES – POLICY LU-19

The City proposes to delete Comprehensive Land Use Policy LU-19.9 to better match the intent of the Downtown Plan and Downtown Development Code. The current policy reads as follows:

*LU-19.9: Revise land use and development regulations to require mixed use development within the Downtown for any new development excepting standalone commercial pads and service commercial areas.*

The City is considering a form-based code. This is a regulatory scheme that controls building form first, and building use second, with the purpose of achieving a particular type of “place” or built environment based on a community vision. In this case, the Downtown Plan “form” includes mixed use development, some standalone multifamily, public places, new infrastructure, and commercial/office uses. The way the current policy is written it would require all new development, excepting stand-alone commercial, to be mixed use which is not entirely accurate.

Amending or deleting Policy LU-19 is consistent with the alternatives under consideration in the EIS and related options in this Addendum whereby mixed use is incentivized and required in many places but

recognizes that there are some locations where stand-alone residential uses would be compatible as described above.

## GAS STATIONS

Currently, the City allows Convenience Commercial in the CBD, and the Downtown Development Code proposed in the Final EIS and Addenda did not prohibit them. The use is defined below:

*Convenience Commercial. Stores which may be either primarily engaged in serving the auto-driving public or, at lesser levels, principally oriented to neighborhood pedestrian traffic, which may include any combination of gasoline sales, uses typical of Food Stores as listed herein, and same-structure collocation of limited prepared food and drink sales such as fast food or espresso; as distinguished from Food Stores Commercial use type, which does not allow gasoline sales.*

*Level 1: Structure of up to ten thousand (10,000) gross square feet, without gas sales.*

*Level 2: Structure of up to 10,000 gross square feet, with up to six (6) two-sided gas pumps.*

*Level 3: Structure of up to twenty thousand (20,000) gross square feet, with up to nine (9) two-sided gas pumps.*

*Level 4: Structure of over twenty thousand (20,000) gross square feet, with more than nine (9) two-sided gas pumps. Level 4 shall include levels 1, 2 and 3.*

The City is considering prohibiting Convenience Commercial Level 2 as well as 3 and 4 in the Downtown subarea. It would be difficult to achieve that use given the frontage standards of the Downtown Development Code. There are no such developments in the Downtown subarea currently. At one time, there was a Chevron Station at the corner of Gravelly Lake Drive SW and Alpharetta Avenue SW. Convenience stores with gas pumps are found within the immediate periphery of the Downtown in other commercial zoning districts.

Given the absence of Convenience Commercial development Levels 2-4 and the intent of the Downtown Plan and Downtown Development Code to both promote a mixed-use pedestrian environment and limit auto-oriented designs, this change is not anticipated to result in environmental impacts not otherwise considered in the EIS process.

## Comparison of Alternatives

Due to land use, density, height, parking, and other allowances, growth would vary by alternative as illustrated in Exhibit 4. The City Council’s Preferred Alternative, including options considered in this Addendum would continue to be in the range of prior studied alternatives.

**Exhibit 4. Alternative Plan and Code Changes and Associated Housing and Job Growth**

Feature	No Action	Action Alternative 1 / Modified Alternative 1	Action Alternative 2 / Preferred Alternative
Plan and Code	Current Plan and Code	All Options: <ul style="list-style-type: none"> <li>■ New Subarea Plan</li> </ul>	All Options: <ul style="list-style-type: none"> <li>■ New Subarea Plan</li> </ul>

Feature	No Action	Action Alternative 1 / Modified Alternative 1	Action Alternative 2 / Preferred Alternative
		<ul style="list-style-type: none"> <li>New Hybrid Form-Based Code and Parking Standards</li> </ul>	<ul style="list-style-type: none"> <li>New Hybrid Form-based Code and Parking Standards</li> </ul>
Height	Up to 90 feet allowed, trend of 1-2 stories	<p>Alt 1: Greater height in center but stepped back on periphery.</p> <p>Most development at 2 to 6 stories.</p> <p>Incentives to earn up to 90 feet (e.g. office).</p>	Greater height in center but stepped back on periphery. More development of office and housing would create greater intensity of building form and heights up to 90 feet.
Housing Density	54 units per acre	<ul style="list-style-type: none"> <li>Alt 1: 80 units per acre</li> <li>Mod. Alt 1: 85 units per acre</li> </ul>	<ul style="list-style-type: none"> <li>Alt 2, Planning Commission Preferred: 100 units per acre</li> <li>City Council Preferred: 100 units per acre for mixed uses and 80 units per acre for stand-alone multifamily uses*</li> </ul>
Housing: net growth	456	Alt 1: 1,579 Mod. Alt 1: 1,725 net units	2,257
Job Trends and Building Space	Current trends continue: minor new construction and addition of jobs at existing sites.	<p>Alt 1: Assume 50% of expected 3.0 million new square feet of commercial space.</p> <p>Mod. Alt 1: Assume 55% of expected 3.0 million new square feet of commercial space.</p>	Assume 95% of expected 3.0 million new square feet of commercial space.
Job Mix	Compared to existing job mix, lesser share of retail and less manufacturing/warehousing, and greater share of finance, insurance, real estate, and services (e.g. office). Similar share of government and education. (Per City transportation model assumptions.)		
Jobs: net growth	1,667	Alt 1: 4,147 Mod. Alt 1: 4,531	7,369

\*See analysis of options in this Addendum.

Source: BERK, 2018

## Preparer

Prepared under the direction of the City of Lakewood.

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Date Prepared: September 25, 2018