



Ronald T. Jepson & Associates

Consulting Engineers – Land Surveyors – Project Management & Development
222 Grand Ave. Suite 'C', Bellingham, WA 98225 360-733-5760

CONSOLIDATED PERMIT SUBMITTAL
APRIL 29th, 2013

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The Applicant hereby requests a consolidated submittal per BMC 21.10.060 for this project.

The Applicant understands and agrees that the review time frame for the consolidated submittal will be whatever the longest among the requested permits is.



Land Use Application

Check all permits you are applying for in the boxes provided. Submit this application form, the applicable materials listed in the corresponding permit application packet(s) and application fee payment.

Form with three columns of checkboxes for permit types (e.g., Accessory Dwelling Unit, Binding Site Plan, etc.) and an 'Office Use Only' section for administrative tracking (e.g., Date Rcvd, Case #, Process Type).

Project Address: 4413 Consolidation Ave.

Tax Assessor Parcel Number(s): 380332 172175

Project Description: "purpose built" Student Housing Development, consisting of 165 units in four multi unit buildings and a club house

Applicant/Agent [checked] Primary Contact for Application

Name: Ronald T. Jepson, PE, PLS Phone: 360-733-5760

Address: 222 Grand Avenue, Suite C Fax: 360-647-8939

City, State, Zip: Bellingham, WA 98225 E-mail: rjepson@jepsonengineering.com

Owner(s) [checked] Applicant [] Primary Contact for Application

Name: Ambling University Development Group LLC Phone: 229-219-8129

Address: 348 Enterprise Dr. Fax:

City, State, Zip: Valdosta, GA 31610 E-mail: cperry@augllc.com

Property Owner(s)

I am the owner of the property described above or am authorized by the owner to sign and submit this application. I grant permission for the City staff and agents to enter onto the subject property at any reasonable time to consider the merits of the application and post public notice. I certify under penalty of perjury of the laws of the State of Washington that the information on this application and all information submitted herewith is true, complete and correct.

I also acknowledge that by signing this application I am the responsible party to receive all correspondence from the City regarding this project including, but not limited to, expiration notifications. If I, at any point during the review or inspection process, am no longer the Applicant for this project, it is my responsibility to update this information with the City in writing in a timely manner.

Signature by Owner/Applicant/Agent _____, Date 4/24/2013

City and State where this application is signed: Bellingham WA
City State



PLANNED DEVELOPMENT PROCEDURE AND REQUIREMENTS
(Process Type II)

PLEASE TYPE OR PRINT CLEARLY IN BLUE OR BLACK INK

Project Data:

1. Legal Description of Property TRACT F OF CEDAR RIDGE PLAT, DIVISION II, AS PER THE MAP THEREOF, RECORDED UNDER AF# 2020703650, RECORDS OF THE WHATCOM COUNTY AUDITOR, WHATCOM COUNTY, WASHINGTON.
2. Size of subject property is 485,444 square feet.

Land Use Classification:

1. Neighborhood Plan Name Puget Neighborhood
2. Subarea Number 17 General Use Type and Use Qualifier Multifamily Residential, Medium Density
3. Have you had a pre-application meeting with Planning Staff regarding this project? yes
Staff Contact: Kathy Bell

4. Description of the proposed project: The proposed project is a "purpose built" Student Housing Development, consisting of 164 units in four multi-unit buildings and a club house, together with associated utilities.



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SAMISH NEIGHBORHOOD PLAN

The subject site is located in the Puget Neighborhood. The Samish Neighborhood is adjacent to the site, across Consolidation Avenue to the south. This narrative responds to the Samish Neighborhood Plan due to that adjacency and due to the Samish Neighborhood's involvement with the proposal so far. Note that half of the properties to the south are zoned Single Family Residential, Low Density, and the other half is zoned Multi-Family Residential, Medium Density.

I. Neighborhood Character Guidelines

1. *The following characteristics are highly valued by residents and should be retained: large lots, single-family zoning, natural open spaces, views and trees consistent with Bellingham's Comprehensive Plan.*

This site, and the areas to the west and north, are all zoned Residential Multi, Planned. We are combining the open space both on site and adjacent to our site to provide for contiguous larger open spaces. The subject site is 11.15 acres. A total of 21.4% of the existing site (2.39 acres) will remain in a natural state, and an additional 35.2% of the site (3.93 acres) will be landscaped as either useable or passive open space. This totals 56.6% of the site (6.32 acres) that is either left natural or re-vegetated. Additionally, there is a 15 acre open space property immediately to the north of our property (dedicated as part of the Hawley's re-plot). These combine together to form a large contiguous open space that also connect to various other open spaces. There will be walkways that connect these together. Views for the neighborhood above will be either preserved or enhanced.

2. *Careful consideration should be given to environmental features such as steep slopes, shallow, rocky soil with exposed sandstone, wetlands and complex drainage patterns, and difficulty of access to some areas when development is proposed.*

We have carefully considered the existing slope by placing the buildings and parking along the contour lines, and we have stepped the buildings to conform with the slope. The Hawley's Replat of 1994/1995 preserved the existing 15 acres of open space and wetlands to the north of the site. This was intended to satisfy all requirements for the wetlands and drainage, but since then an additional 100' buffer was placed on the northerly portion of the subject site.

3. *The Samish Neighborhood strongly recommends home design and placement on the land respect and conform to natural landscape features. Roof lines should be designed in a manner that preserves views and privacy, provides access to sunlight and maintains neighborhood character in each area of the neighborhood.*

Our proposal conforms with and respects the natural topography of the site, by placing the buildings and parking along the contour lines. The buildings are set back far from the property lines, so that views from above are enhanced. This also allows for greater access to sunlight for the neighbors below. The roofs of the buildings will be at or below the level of Puget Street. The homes to the



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south that are in the Samish Neighborhood will likely not see the buildings through the existing and enhanced vegetation.

4. *Property owners should be encouraged to replant their developed lots with native trees and shrubs.*

We will provide for significant replanting, and this will all be done with native trees, shrubs, and groundcovers.

5. *Development across the remaining, undeveloped hillside needs to be better integrated by the overall design of connector streets.*

We are not proposing any additional streets.

6. *Urban villages, cluster development, and higher intensity land uses may be considered when transportation infrastructure is in place or is concurrent with development and located in appropriate areas of the neighborhood consistent with current zoning, such as along San Juan Boulevard and Governor Road. In judging appropriateness, the distinguishing characteristics of the neighborhood, e.g. drainage, circulation, single family areas, should be considered.*

We are providing a cluster development as we are within walking distance to transportation infrastructure – the WWU Lincoln Creek Park & Ride. We are working closely with the existing drainage patterns and the slope of the land.

7. *Land use and zoning variances should enhance neighborhood character.*

We are requesting a zoning variance as part of the consolidated permit application. See the Variance Request for how we are enhancing the neighborhood character.

8. *Vegetation on skyline and ridges should be preserved so that trees and vegetation will be visible at the ridge top rather than buildings.*

While this is not directly applicable because we are near the toe of the larger slope system, the point that we should preserve trees and vegetation is being satisfied by the large amount of open space that is being undisturbed, 21.4% , and by the large amount of land area that is being enhanced or replanted, 35.2%. We are combining the open space both on-site and adjacent to our site to provide for contiguous larger open spaces. The subject site is 11.15 acres. A total of 6.32 acres will remain in a natural state or will be landscaped as either useable or passive open space. This totals 56.6% of the site that is either left natural or re-vegetated. Additionally, there is a 15 acre open space property immediately to the north of our property (dedicated as part of the Hawley's re-plot). These combine together to form a large contiguous open space that will be visible and permanent.



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II. Open Space and Recreation

1. Natural Areas

SN priority: Provide, maintain and enhance natural open space in the neighborhood.

- a. SN Goal: *Develop and maintain open space prior to or concurrent with development.*

This land known as The Hawley's Property was replatted in 1994/1995. Included in the plat was 15 acres of open space and wetlands/drainage preservation, including all necessary buffers. This was established into a separate parcel and is located adjacent to and north of the subject property. This open space was intended to satisfy the open space for the entire master planned development, which includes the subject property and the multi-family zoned properties to the west and south. The latter were built out as single family properties, but maintain multi-family zoning. Since that time, regulation has imposed additional wetland buffering onto the north 100' of the subject site. We are honoring that additional buffer requirement. In addition, we are leaving 21.4% of the site undisturbed, and enhancing 35.2% of the landscaping on the site.

- b. SN Goal: *Create neighborhood green belts and habitat corridors through a variety of means such as planting native plants in undeveloped ROWs, connecting open space tracts and natural areas to each other.*

There are no roads proposed or necessary as part of this development, other than the short $\frac{3}{4}$ improvement of Consolidation Avenue. Therefore the Consolidation Avenue ROW can remain natural except for the trail that will be developed within it. We are leaving a substantial amount of the site as open space, either natural or enhanced with native plantings, so that we will provide large natural areas.

- c. SN Goal: *Establish a neighborhood tree-planting program.*

We will be providing a substantial amount of tree planting on the subject site, and would be interested in participating in a tree-planting program.

2. Parks

SN Priority: Create and maintain neighborhood parks for local use.

- a. SN Goal: *Work with the City to develop a high quality system of multipurpose park trails, bike lanes, and sidewalks that access significant environmental features, residential areas, commercial areas, and public facilities including schools, Lake Padden Park and public transportation sites to allow people to walk and bicycle safely.*

We will work with the City to plan and construct a trail within the Consolidation Avenue and perhaps the Puget Street ROWs. These will allow access and connection for the subject site and for the Puget neighborhood to the Lincoln Creek Park n' Ride.



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- b. SN Goal: *Work with the City to identify projects for inclusion in the Parks, Recreation and Open Space Chapter of the Comprehensive Plan. Explore the feasibility of and priority for applying city and neighborhood resources to improve city owned properties as safe and useable areas.*

As stated above, we will provide for a trail. We will also become part of the neighborhood and thus work with the City to improve other city owned properties.

3. Trails

SN Priority: Build and maintain neighborhood trails and connectors to Lake Padden as part of a north/south trail system

- a. SN Goal: *Work with the City and neighborhood to identify areas for trails and trail links that allow peoples to walk and bicycle safely from residential areas to Lake Padden, commercial areas, and schools.*

We will work with the City and Neighborhood to improve the trail in the Consolidation Avenue ROW. Because the site is located within four blocks of the WWU / Lincoln Creek Park & Ride, and because Western Washington University provides Whatcom County bus passes to all enrolled students, we anticipate that our residents will walk and bicycle to that park and ride or all the way to campus.

- b. SN Goal: *Develop a plan for using undeveloped ROWs as trail corridors and natural areas.*

We will work with the City and Neighborhood to improve the trail in the Consolidation Avenue ROW.

- c. SN Goal: *Develop natural areas to maximize safety to the users and discourage vandalism to the environment.*

The Hawley's Replat of 1994/1995 preserved 15 acres of open space directly to the north of the subject site. This was intended to satisfy all requirements for the open space for the entire Hawley's planned development. We are proposing an additional 6.32 acres of open space to supplement that. Walkways and trails within these areas will be designed with safety in mind. This will include lighting and placing them with "eyes" on them.

4. Sensitive Areas

SN Priority: Require tree planting and tree replacement as part of new development and require that trees be maintained until lots are sold.

- a. SN Goal: *Preserve sensitive areas and unique geographic formations and connect them with a system of greenway corridors.*

The Hawley's Replat of 1994/1995 preserved 15 acres of open space to the north of the site. This was intended to satisfy all requirements for the open space for the entire Hawley's planned development. We are proposing an additional 6.32 acres of open space to supplement that.



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- b. SN Goal: *Wetlands should continue to be preserved and enhanced in order to protect the many functions they serve, including wildlife habitat.*

The Hawley's Replat of 1994/1995 preserved the existing wetlands and drainage to the north of the site. This was intended to satisfy all requirements for the wetlands and drainage, but since then an additional 100' buffer was placed on the northerly portion of the subject site.

- c. SN Goal: *The Padden Creek corridor should continue to be preserved to protect the many functions it serves, including wildlife habitat.*

We are not in the Padden Creek corridor, so this is not applicable.

III. Public Facilities and Utilities

SN Priorities:

- A. *Enforce regulations relating to control of drainage, erosion, and runoff associated with infill and new building, and minimize disturbance of existing permeable soils in order to minimize possible downslope effects from new development. The City should make sure that existing laws are adequate to address these concerns.*

We are meeting or exceeding the Best Management practices for drainage, and thus erosion and runoff. We designed the buildings to conform with the natural slope of the site as well. See the Drainage Report.

- B. *Maintain consistency of sidewalks, street width and curbs throughout neighborhood within appropriate areas, giving consideration to neighborhood resident's input.*

The only street and sidewalk improvements are the short improvement of the Consolidation Avenue ROW to the project entrance. These will be designed to conform with the requirements of the area.

- C. Samish Neighborhood strongly recommends infrastructure such as sewer system, water mains and water towers be in place to serve development or constructed as development occurs.

1. Drainage

- a. Current drainage conditions allow uncontrolled flows from a large basin uphill from the project to enter the project site via a culvert under Puget Street and then erode down the slope and eventually daylight behind the residences along Nevada Street.
- b. The proposed site improvements and drainage system would intercept this flow and route it in a contained manner to the current downstream outlet.
- c. Increased flows from site improvements will be controlled via a large concrete vault underneath parking areas and filtered via an 11,000 SF landscaped rain garden before exiting the site via an existing drainage system stub that was installed when the area was platted. Both this stub and the downstream system were sized to have sufficient capacity to accommodate this site when fully built out.



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2. Water and Sewer

Water service to the site will be provided by the current water main in Nevada Street. A pump station will be necessary on site to provide adequate pressure to the upper portions of the site.

3. Other Concerns

The existing trail in the Consolidation Avenue ROW will be improved and connected to Puget Street providing increased connectivity from upper to lower portions of the neighborhood.



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PUGET NEIGHBORHOOD PLAN

The subject site is located in the Puget Neighborhood.

I. Neighborhood Character

Puget Neighborhood is a large single-family neighborhood with pockets of multi-family residences, etc. The subject site is zoned Residential Multi, Planned as is the property to the north and west of the site. The property to the east of the site is zoned Single Family Residential, Low Density. There is a height limitation imposed on a portion of our site because of this. We are requesting a zoning variance to that height limit. Note that the project will be below the Puget Street level, and thus the impacts are minimal.

II. Open Space

a. Part One – Parks, Trails and Open Space

i. *Existing Facilities.*

These facilities are enjoyed by the entire city of Bellingham as well as many students at WWU.

ii. *Existing and Proposed Trails.*

The neighborhood plan states that there is an unofficial trail in the Consolidation ROW between Puget and Nevada. We intend to improve that trail, and we will coordinate with the City to do so.

iii. *Existing Open Space “These green spaces are privately owned with no public access; however the resulting beauty helps define the character of the neighborhood. Preservation of this quality is warranted”.*

We are proposing less density than what was originally intended, with clustered buildings that are taller. This results in a reduced footprint on the land. And thus, it will allow for more open space than would otherwise occur. See attached plans.

iv. *Existing Environmentally Sensitive areas. “Green space is also a result of wetlands and/or environmentally sensitive areas that have been or will be restored to native habitat. The Hawley Property: This is an open space west of Puget Street and east of Nevada Street in between Edwards and the base of the Puget Hill”.*

As part of the land planning of the area, the Hawley’s Replat of 1994/1995 introduced a 15 acre set-aside of the open space and wetlands, which is the adjacent site to the north. Since then, an additional 100’ buffer was imposed on to the subject site. These combined will provide for a large consolidated tract of open space in perpetuity.



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b. Part Two – Analysis & Objectives

- i. *Because many of the larger landscaped lots are on the hill and are part of the water flow into Whatcom Falls Creek, the neighborhood must be responsible about runoff. Prudent and limited use of fertilizer, pesticide and insecticide is vital.*

On-site landscaping will be predominately native species that require minimal to no management chemicals such as fertilizers and pesticides. Additionally all site runoff will be treated in a bio-retention area (raingarden) that will capture and neutralize any problematic compounds before they are released to downstream drainage systems. See the attached Drainage Report for specifics.

In undeveloped, un-platted residential areas, dedication of open space and park impact fees are a required part of plat approval. Many of the open space patterns follow steep hillsides and stream corridors. These critical areas are inherently unsuited for development. Stream corridors are also a recreation resource and have value as wildlife areas. Steep hillsides provide the scenic backdrops that are an important element of Bellingham's character. The nature of development on hillsides should be such that the scenic character is not significantly altered.

The Hawley's Replat of 1994/1995 dedicated 15 acres of open space and wetlands directly to the north of the subject site. The subject site is 11.15 acres, and of that we are leaving 2.39 acres (21.4%) untouched and are enhancing the vegetation on another 3.93 acres (35.2%). This design solution will allow for far more visible and contiguous green space than would otherwise be developed under the current zoning that was established in 1995. It should be noted that our initial Park Impact Fees are projected to be \$577,875.00. (Calculation based upon the city fee schedule). Of this amount, \$115,575 (20%) are scheduled to be allocated to Neighborhood Facilities.

Because of the central location of Civic Athletic Complex in the Puget Neighborhood, highly developed parks are not needed. Instead, naturally landscaped, low maintenance open space areas and smaller neighborhood parks are proposed with playgrounds for toddlers and small picnic facilities.

The proposal calls for 6.32 acres of low maintenance open space. The resident population will be college students, and there will be clubhouse facilities on site, so there is no additional demand for playgrounds. While there will be some summer residents, the facility will be occupied predominantly in the fall through spring, and under-populated in the summer months. Therefore, this project has minimal impact on neighborhood parks and facilities while providing both a significant additional tax base as well as the added benefit of Impact and Permit Fees.



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c. Part Three – Puget Parks, Recreation and open space goals (PPG) and prioritized implementation strategy

1. *PPG 1: A public park should be within walking distance of every Puget Neighborhood resident.*

This asks for a park in a specific location that does not apply to this proposal.

2. *PPG 2: Puget neighborhood trails should provide accessibility & connectivity options within the neighborhood.*

A. *Samish Crest Trail*

Does not apply

B. *Whatcom Creek Trail to Downtown*

Does not apply

C. *Install better signage on existing trails and ROWs.*

We will incorporate better signage as part of our design and construction of a trail in the Consolidation ROW.

D. *Provide adequate funding for trail maintenance.*

This trail is in public ROW and thus will be maintained by the appropriate city department.

E. *Evaluate the possibility of adding the following trail connections:*

Consolidation ROW and through the Hawley Property from Puget to Nevada.

We will design and construct a trail in the Consolidation ROW that will satisfy this goal. We will work with the City to determine if it runs through the 46th Street ROW to Puget Street, or continue directly up the Consolidation ROW to the east where it intersects with Puget Street.

F. *Encourage developers to provide neighborhood trail connectors.*

We are doing so, see E above.

3. *PPG 3: The Puget Neighborhood should continue to use practices which protect and preserve the environment.*

A. *Encourage widespread use of the Backyard Habitat Program, which includes native vegetation and plantings to absorb runoff in the Whatcom Creek watershed areas.*



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We are proposing to leave 21.4% of the site in its native state, and enhancing 35.2% of the site with native vegetation.

B. When building trails, use native plants and other low impact development techniques.

We will incorporate this into our design and construction of the trail in the Consolidation ROW. The project will be designed and constructed according to the City process and requirements.

C. A dense buffer along I-5...

Does not apply.

III. Public Facilities and Utilities

a. Drainage

PDG 1: All water channels should be kept open and supporting water flow at all times.

Project Solution: All new impervious surfaces on site will be subject to water quality facilities and then routed to existing downstream drainage systems with an eventual outfall into Lincoln Creek. An existing drainage outfall on site will be similarly routed to maintain Lincoln Creek hydrology.

PDG 2: All new developments should be constructed consistent with the recommendations of the Watershed Master Plan, the Stormwater Comprehensive Plan, and stormwater development guidelines.

Project Solution: The project proposes to use the most current Best Management Practices from the 2012 version of the Department Of Ecology Surface Stormwater Management Manual in order to assure proper detention and treatment of runoff from the proposed surfaces. All downstream conveyance was sized and installed based on greater impervious area than we are proposing.

Project Solution: A construction Stormwater Pollution Prevention Plan will be in place before construction begins and aggressively maintained during the course of construction in order to protect surrounding neighbors and waters from any impacts due to construction.

b. Water

PWG 1: Those facilities which are undersized for fire flow should be replaced.

Water service to the site will be provided by the current water main in Nevada Street. This main has sufficient flow but insufficient pressure. A pump station will be installed on site to provide adequate pressure to the upper portions of the site.



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c. Sanitary Sewer

PSG 1: All of sanitary sewer system should be sized to adequately service the neighborhood especially where new development is occurring.

Project Solution: Existing sewer mains adjacent to the project in Nevada Street and Consolidation Avenue are adequately sized for the proposed project and require no replacement.

IV. Schools

Does not apply.

Our population will not use public schools. They will all be students at the local University or Colleges.

V. Transportation

a. Part One – Streets, pedestrians and bicycling facilities

i. Arterials

Does not apply. Nevada Street is classified as a Residential/Other street. Consolidation Avenue currently terminates at the subject site, and we will improve it as indicated in our plans.

ii. Pedestrian Facilities.

We will provide a trail in the Consolidation Avenue ROW, as previously mentioned.

iii. Bicycle Lanes.

Does not apply. Note that we are providing convenient, covered bike storage on site, thus encouraging the use of bicycles.

b. Part Two – Transportation analysis and objectives

One reason many of the Puget neighbors have chosen to live in the neighborhood is because of proximity to downtown, Western Washington University, as well as I-5 for its connections to outlying areas. In fact, more than any public or private facility, the Puget Neighborhood is unified by the presence of Lakeway Drive. Besides being the focus for the regional and neighborhood commercial district, the Lakeway/Lincoln area is a crossroads intersection with many users of wide variety of transportation modes moving in multiple directions.

This project proponents selected this site for purpose-built student housing for the very reasons stated in the first sentence above. The subject site is proximate to WWU, and the residents will use low-impact transportation modes to get between their homes and WWU, and their homes and retail facilities. They will predominantly use their Whatcom Transit Passes (provided as part of their WWU tuition), and also bicycle and walk to the WWU / Lincoln Creek Park & Ride.



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i. *Destination: Lincoln Creek Park & Ride*

The Lincoln Creek Park & Ride facility is owned, operated, and being improved in several phases by Western Washington University (WWU).

The residents of this proposal will primarily be using this facility for their transportation to WWU. It is only four blocks from the subject site.

ii. *Destination: Arterials in Residential Zones*

Pedestrian challenges while travelling along arterials. Puget Street (between Edwards and Consolidation Avenue): Lack of sidewalk and/or separated walking space from vehicles.

We are proposing an east/west trail along the Consolidation ROW, and will study linking that to a north/south trail in the Puget ROW

iii. *Destination: Residential Connectivity*

Consolidation Avenue ROW between Nevada Street and 46th

We are proposing an east/west trail along the Consolidation ROW.

c. Part Three – Puget Neighborhood Goals (PTG)

i. *PTG 1: Expand Puget Neighborhood transportation options to more fully support pedestrian, bicycle, and transit travel for mobility within the neighborhood.*

The proposed project will rely on transportation options to the single occupancy vehicle. The resident population will primarily walk to the WWU / Lincoln Creek Park & Ride, bicycle there, and bicycle to WWU.

ii. *PTG 2: Expand Puget Neighborhood transportation options for accessibility & connectivity to areas outside the neighborhood, especially to nearby employment, educational and cultural centers.*

The residents will be connected to WWU, and use the transportation options mentioned above. Note that driving to WWU is discouraged due to high parking rates at the campus. Commuting is encouraged by the free bus passed provided to each student as part of their tuition.

iii. *PTG 3: Preserve livability of residents affected by the principal, secondary, and collector arterial streets.*

The residents will principally walk or bicycle along Consolidation from the project entry to the WWU / Lincoln Creek Park & Ride. There will be minimal impacts on other streets and roads.



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iv. *PTG 4: Increase traffic-related safety*

Safety is a big concern. The location of the proposal is in an excellent location for safety, as the residents will principally walk or bicycle along Consolidation from the project entry to the WWU / Lincoln Creek Park & Ride.

v. *PTG 5: Improve vehicle, bicycle, and pedestrian use and safety along the Lakeway Drive and Lincoln Street corridors.*

Does not apply.

d. Part Four – Transportation policies and prioritized implementation strategy (PTP)

i. *PTP 1: Access in the urban village*

Does not apply

ii. *PTP 2: Develop and promote efficient and safe access for neighborhood center and Civic field complex*

Does not apply

iii. *PTP 3: I-5 and WSDOT*

Does not apply

iv. *PTP 4: Facilities for bicycle travel to urban center, etc.*

Does not apply

v. *PTP 5: Safe access to Lakeway.*

Does not apply

vi. *PTP 6: Promote connectivity including in undeveloped footpaths in the ROW*

We are proposing an east/west trail along the Consolidation ROW.

vii. *PTP 7: Provide low-impact surface mitigation where informal pathways are in the ROW.*

We are proposing an east/west trail along the Consolidation ROW.

viii. *PTP 8: Improve pathways in the ROW.*

We are proposing an east/west trail along the Consolidation ROW.



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ix. PTP9: Mitigation for arterials

Does not apply

x. PTP: Crossings for San Juan Boulevard.

Does not apply