

## **47° North Project - Process Update**

March 12, 2020

In October, 2019, the City held a public scoping meeting for the 47° North master plan proposal and Supplemental Environmental Impact Statement (SEIS). At that time, the applicant, Sun Communities, expected to revise and augment its Pre-Application submittal plans, and to then submit a formal application to the City shortly thereafter. City representatives informed the public of this expected process and sequence at the scoping meeting. Sun Communities recently advised the City that it preferred to hold off on its formal application and to integrate completion of the application with the State Environmental Policy Act (SEPA) review process. In this integrated approach, Sun would prepare and provide the key pieces and details of its master plan application to the City's SEIS team now, but would wait to submit the formal application until after publication of the Draft SEIS. This would allow it to review the findings of the SEIS and to refine its project plan to address identified impacts.

An integrated approach to developing an application is consistent with provisions of the SEPA rules. The rules explicitly encourage early review of project proposals and commencing environmental review prior to receipt of a formal application (See WAC 197-11-050). Early review can result in early identification of impacts, which in turn can lead to refinements to initial development concepts to avoid, reduce or minimize environmental impacts. Many master plan projects follow this approach to developing and refining a proposal, prior to submitting an application.

The City has been following SEPA's early review provision, and the SEIS is not dependent on receipt of an application. The applicant is preparing and submitting the key project (e.g., plans for clearing and grading, stormwater management, utilities and infrastructure, etc.). This information will enable the SEIS to be site-specific, project-specific and detailed. The SEIS is expected to identify some impacts that will suggest beneficial changes to the proposal, which can then be incorporated into an application that is submitted to the city later this year.

Interested citizens should be assured that the change in the expected timing of the application will not limit their ability to comment on the project; the City's land use and environmental review process will provide multiple opportunities to review the details of the proposed master plan and to provide comments. The submittal of a complete master plan application will trigger publication of a notice of application and a public comment period; notice and comment requirements are embedded in State law and City code. Publication of the Draft SEIS will also trigger an opportunity for the public, agencies and tribes to review and comment on the environmental impacts of the proposal. The Planning Commission and City Council will also hold public hearings on the proposal, which will be based on the application and the SEIS.