

Developing a Draft Environmental Impact Statement

For the Projected Growth Requirements in the Edmonds 2024 Comprehensive Plan Update

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PROCESS

This whitepaper assumes the reader has a basic understanding of the comprehensive planning process and associated environmental impact analysis. The purpose of the Draft Environmental Impact Statement (DEIS) is to analyze the merits and impacts of at least 2 alternatives and compare those to a Do Nothing alternative. The City’s EIS consultancy, Herrera, will receive the **2 bookends** in April 2024 that define 2 growth alternatives and provide the Council a **Preliminary DEIS report** in June on the impact of future growth. The bookends must be realistic, and distinct from each other. In other words, they study different parcels and different land uses in the City. Then Council will discuss, analyze, and define the **Preferred Growth Alternative**. The DEIS report will then elaborate the Preferred Alternative and define the mitigations to the impact of growth from several dimensions as required in the State Environmental Protection Act (SEPA). See the Venn diagram in Appendix 3. It illustrates that the preferred alternative may be an amalgam of the elements in the bookends or may be one of the bookends. The DEIS development, public engagement, and finalization process is controlled by the SEPA regulation. For 2024, the comprehensive plan update will include a city-wide EIS analysis.

Edmonds is now designated to be a High Capacity Transit (HCT) community and has been allocated a significant portion of the total growth planned for Snohomish County. Therefore, this planning cycle is unlike any past Comp Plan update and plans for 30% population growth. Although the planning timeline is 20 years, the land use decisions will conceivably affect Edmonds neighborhoods for the next 80 years. This is not an academic planning exercise. It has the potential to permanently change the current Edmonds way of life by the urban planning methods we use to prepare to welcome our new neighbors.

Planning for increased density because of HCT transit designation sets up the inherent complexity of complying with the development regulations in environmentally critical areas. Development regulations must preserve the existing functions and values of critical areas per the GMA (WAC 365-196-830).

“Avoidance is the most effective way to protect critical areas. If development regulations allow harm to critical areas, they must require compensatory mitigation of the harm. Development regulations may not allow a net loss of the functions and values of the ecosystem that includes the impacted or lost critical areas.”

The challenge to City leaders is to make judicious land use changes so that even though Edmonds could be transformed into a denser city over decades, it continues to offer a high quality way of life that is anchored in the immense environmental riches we have. This whitepaper discusses the growth alternatives for housing units and is not comprehensive of all the elements in the Comp Plan.

Here is a high level look at the result we are driving to in Dec. 2024 when viewed through the lens of the environmental riches of Edmonds and the sense of place that we have in the business districts. The update includes the following:

- 1) Updating the Land Use Map to allow for the County allotted increased housing estimates of 9000 units in a manner compliant with the 3 recent State of Wash. housing bills
- 2) Updating the current Land Use Map to prevent over-development from:
 - a) Damage to environmentally sensitive areas including critical habitat areas, aquifers used for drinking water, Shoreline Management Act areas, and tree canopy and wildlife corridors.
 - b) Exceeding the capacity of current City infrastructure including, but not limited to, sewage transport and processing in accordance with State law; stormwater infrastructure and preventing damage to homes, creeks and Puget Sound; roadways, parking, sidewalks, and parks.
 - c) Impacting the “Edmonds Way of Life” whose drivers are:
 - a. Access to Puget Sound beaches, streams, and a Lake Ballinger which are as healthy as we can make them
 - b. Low rise buildings
 - c. Mature conifers of over 80 feet in height
 - d. Access to parks
 - e. Outdoor market for small vendors, creative district, an arts festival
 - f. Business districts with human scale architecture (Westgate, Downtown, 5 Corners, Perrinville, Firdale Village, the International district of Hwy 99 corridor)
- 3) Updating the Land Use Map to protect and encourage small businesses (services, retail, grocery, food and beverage, office space) and public amenities that create a sense of place.
- 4) Updating the Comprehensive Plan and Land Use Map to change out-of-date priorities in the current Plan: the defunct Edmonds Crossing on the site owned by Unocal.
- 5) Updating the Comprehensive Plan and Land Use Map to accommodate the changes set forth by the Growth Management Act for managing displacement risk.
- 6) Adding new land use designations required to be compliant with the 3 recent housing bills

HOUSING GROWTH ALTERNATIVES

The toughest housing bill to plan for in Edmonds is HB 1220 which requires planning for housing at all affordability levels. Therefore the housing types that the Department of Commerce guidance has defined for incomes below 80% of the average median income are the focus of this whitepaper (and have been the focus of the growth alternatives presented to the City Council in Mar. 2024). See the appendix titled “ Do the Math” for a reconciliation to the 9000 housing units to plan for in this cycle. This whitepaper proposes bookends that represent the capacity for 2750 additional housing units for residents in the <80% AMI income range. The other 6250 planned housing units are briefly described in the appendix. A key neighborhood representing approximately 3000 of the 6250 units is the Highway 99 subarea. It is discussed in the section below titled “Scenarios for defining a preferred alternative”. The reader needs to keep two

metrics in their head at the same time: capacity for 9000 new planned housing units to be distributed around the whole city, and 2750 of those housing units are for those earning < 80% of AMI. The 2024 land use map will describe the 9000 units. The most analysis to date has appropriately been about the locations for the 2750 units.

The **do-nothing** alternative is represented by the current land use map and zoned densities. The DEIS analysis will show how and where it is not compliant with current regulations. The 2 **growth** alternatives analyzed in the EIS are called bookends. This paper will refer to them as Distributed Alternative A and Focused Alternative B. This whitepaper is not recommending that either alternative be adopted as policy. But they are intentionally designed to address some concerns expressed by residents, include the assumptions made by Council when the Hwy 99 Supplemental EIS was not prepared in 2023, and the focused alternative is a bold scenario for a new Edmonds Uptown that can easily be pared back when the preferred alternative is defined. A motivator to bring forth a new set of bookends is to have a better DEIS from which to make decisions. This planning cycle for 9000 housing units (housing 13,000 new residents) is a remarkable opportunity to plan for a new mixed use neighborhood. The use of corridors, the Church parcels, and the notion of an Uptown Town Center have created alternatives that are more distinct from each other than the bookends previously discussed at the Council meeting in Mar. 2023. There is no notion of neighborhood hubs in these bookends.

Alt A: Distributed Growth Alternative. Distribute growth **along 3 state highways and major arterials, Business Districts, and Churches** where the following resources currently exist: sidewalks, schools, parks, commercial businesses, and services that create a sense of place. Upzone large church parcels from single family to multi family 2 story. Also make modest increases to density or extent in 4 business districts.

- a) Firdale Village used changed to no higher than **5 story** Mid Rise Mixed Use buildings
- b) 5 Corners use increased to no higher than **3 story** Multifamily and Mixed Use buildings
- c) Westgate district land use and heights unchanged, but **extent** increased to add 2-3 parcels to the district along 100th. (see item f below for Hwy 104)
- d) Downtown has modest growth of **50-75** units.
- e) Reclassify six large church parcels (at least 2 acres) to **1-2 story Multi Family for 700 additional units**. These are fairly evenly distributed across the city and are often on arterials. See list of locations in the appendix. This is not a new idea. It enshrines in the land use map the actual trend of church congregations subdividing and selling part of their land to developers.
- f) Increase height from 2 story multi family to **3 story multi family** on the following transportation corridors:
 - i) Hwy 104, Hwy 524 (196th St)
 - ii) 212th street
 - iii) 244th Street
 - iv) 84th street north of Esperance towards 5-Corners
 - v) 76th Ave

2) **Alt B – Focused growth Alternative.** Focus growth in Business Centers, and a new Uptown Town Center that is based on the Council's strategic decision made in 2017 to site planned growth along the Hwy 99 corridor. Estimated housing units in this section need to be verified.

- a) An estimated **2 high rise** (90 ft) multi family or mixed use projects in the Uptown Town Center are required in order to plan for a large number of housing units Uptown: 2000. Building height changes

from 90ft at the core to 55ft and then to 35ft provide a transition to less intensive surrounding neighborhoods. Photos in appendix 9 show high rise and mid rise projects. A High rise overlay already exists in part of this neighborhood.

- b) The new Edmonds Uptown encompasses the Hospital District, the International District, and 5-Corners. It's capacity is an estimated **2000 housing units**. It is bounded by:
 - i) South- 228th
 - ii) North-208th
 - iii) East- Hwy 99
 - iv) West- 84th (to 220th) and around the 5-corners Multi Family area
- c) Uptown Density has building heights that transition to prevent a canyon effect of tall buildings along a corridor.
 - i) **90'** building heights near the hospital, **Mixed Use** type. This is the area most likely to have public amenities 'paid for' by developer incentives. A 90 ft. building height is already allowed in the hospital district.
 - ii) **Reduce to a 35'** building height in the grocery, retail and food and beverage International District, to maintain human scale and generous sightlines. (The view of Mt. Rainier on the clear winter days is valued and is an element of the Edmonds Way of Life). Consider changing type to "Business" to prevent retail and service business from being redeveloped as Multi family buildings.
 - iii) 5-Corners has **Mixed Use** with **3 stories** and an estimated capacity of **300 units**.
- d) **55' -75'** buildings would be allowed in the other parts of the current CG areas (MF or Mixed Use type).
- e) Add the same growth to the Business Centers that is defined in the Distributed Alternative.

SCENARIOS FOR DEFINING A PREFERRED ALTERNATIVE

The preferred alternative in the DEIS will likely include elements of both bookends for growth.

To illustrate this crucial decision making process, the following examples of decisions are provided for information. It is recommended that 3D simulation software for urban planning be used in the Council work session to define the preferred alternative so that the mass of the planned large buildings can be put in context with the surrounding neighborhood, and the whole city. The reader can evaluate the usefulness of the bookends by testing whether the elements of their desired preferred alternative are contained within the range the bookends create, and whether the mitigations in the preliminary DEIS are achievable.

- 1) Regulate the minimum housing units per acre in MF and MU projects, not the maximum **as** is the current practice. Let the marketplace decide the apartment square footage.
- 2) Reduce max. building height in the Gateway district of Hwy 99 from 75' to 55' and redistribute units to other neighborhoods.
- 3) Require mix of uses in any project with more than 250 housing units (e.g. The Shoreline Council passed an ordinance in Dec, 2023 requiring mixed use after evaluating the high number of new multi family projects that left those neighbors with no nearby shopping.)
- 4) Carve out stretches of corridors from increased growth because the DEIS proves issues with traffic congestion of parking congestion. Carve out stretches of corridors because the DEIS proves issues with noise and air pollution.
- 5) Downzone existing large grocery stores from CG- 75 ft in the hwy 99 corridor to discourage redevelopment. Such stores contribute to a sense of place and are a requirement of a healthy

neighborhood. (Edmonds has lost 4 grocery stores in the City at Salish Crossing, Downtown Ace Hardware, 5 Corners Barq, and Edmonds Goodwill.)

- 6) Define the support for residents who will be displaced by development, and who provides the support.

The following are examples of decisions that **cannot** be made in developing the preferred alternative since it was not in either of these bookends.

- 1) Increase building height on Landmark 99 project site to MF- High Rise
- 2) Upzone large church parcels to 3 story MF in order to plan for 1150 housing units
- 3) Give height bonuses in excess of the heights in the bookends in exchange for affordable units or a public amenity.

The following decision **cannot** be made in developing the preferred alternative (since it's not in either bookend) if using the bookends developed by the Comp Plan consultants or the Planning Board.

- 1) Decrease the building height to 55' in any parcels in the highway 99 subarea.

ASSUMPTIONS

This section describes the assumptions used in defining the growth alternatives.

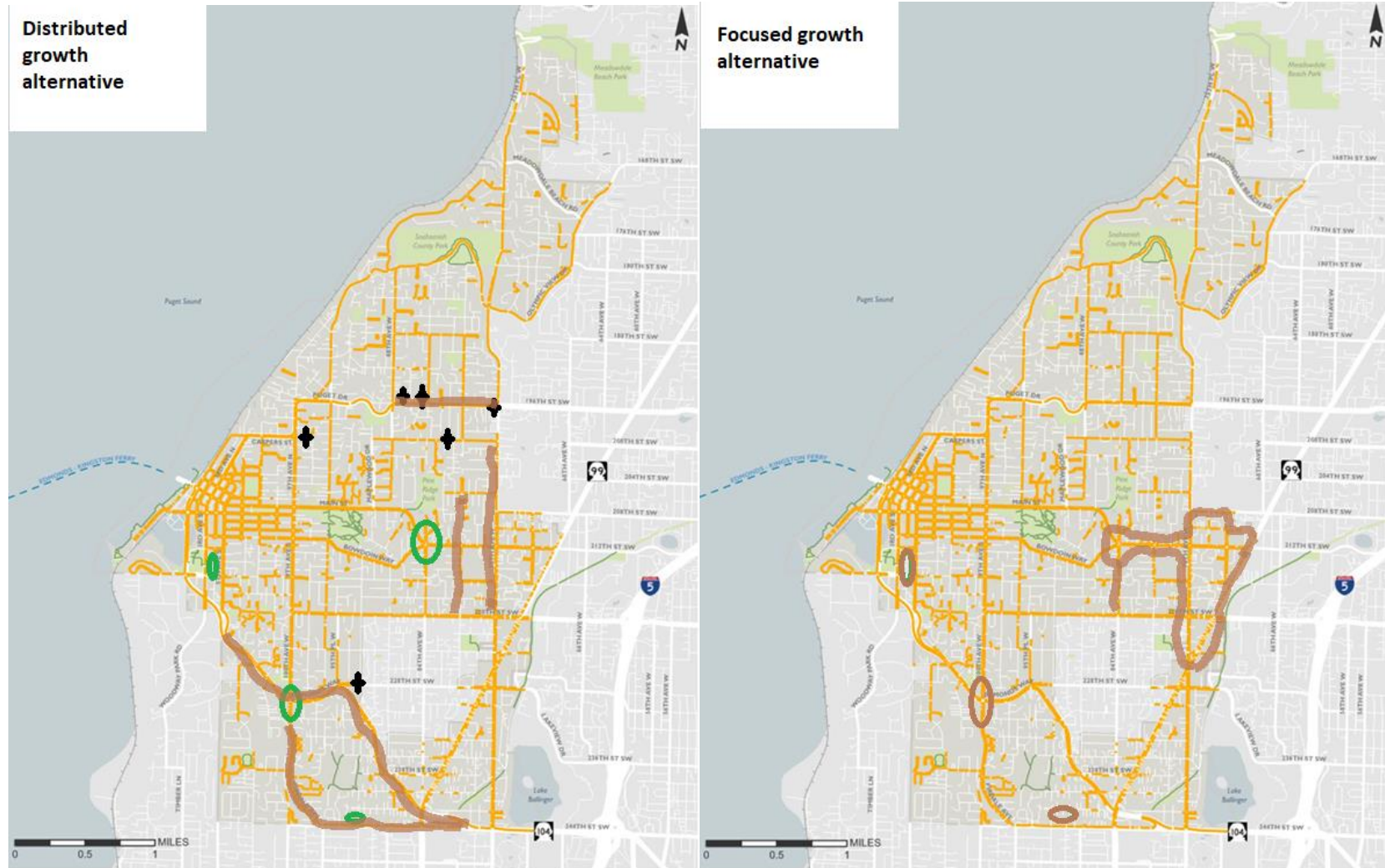
- 1) Remove Perrinville from any land use changes because of the long running flooding problem, the long period of time to design and build a solution, and recognition that the root cause is outside our control in Lynnwood.
- 2) Unocal parcel on the waterfront – downzone from master planned development to open space per Council's priority for having options in future estuary restoration and integration with the Edmonds marsh.
- 3) Remove parcels within 200 feet of Puget Sound or Creeks (such as Holy Rosary Church) since avoidance of redevelopment is the stated best way to protect critical areas. (ref. GMA) This is an impactful assumption that is designed to not only be compliant with regulations but protect the "Edmonds Way of Life".
- 4) New housing is planned for where there is currently at least 3 of the following resources and amenities: sidewalks, parks or large school district campuses, stormwater network capacity, grocery stores.
- 5) Two ADU/DADU's are allowed per residential parcel.
- 6) The most effective way to preserve the 80-100 ft conifers is to put future housing where the trees have already been logged: corridors, business districts, Hwy 99 subarea, large church parcels.
- 7) The building height in the book end descriptions is the max. allowed height. If Council wants the flexibility to offer height incentives in certain locations or building uses, the estimated housing units can be reported as a range. (e.g. 400-450 units in an 8 story MF) and the stated building height is after the height bonus.
- 8) Current bus routes do not have to be a driver of future density locations. Transit systems move their routes to where their customers are. The exceptions to this assumption are 1) Swift Blue Line route on Hwy 99, 2) park and ride lot in the medical district, 3) bus, train and ferry connections on the waterfront. The Uptown alternative relies on the Swift bus line and proximity to a link light rail station.
- 9) There is no change to the 25 ft. height for the residential units that were zoned single family in the 2020 Comp Plan.

APPENDIX

The following documents, tables, maps, and images are in the appendix.

- 1) Marked up Edmonds map for:
Alternative A – Distributed growth
Alternative B – Focused growth
- 2) Venn diagrams of bookends and the preferred alternative.
- 3) Edmonds Sidewalk Map
- 4) List of Churches with parcels greater than 2 acres
- 5) Existing housing capacity map for Edmonds from the Snohomish County Buildable Lands report
- 6) “Do the Math” on the number of housing units to plan for
- 7) Link to the City’s GIS map which has layers for critical areas, watersheds, roadways, storm and sewer networks, and other resources that are germane to land use planning decisions per the GMA-mandated process.
- 8) Photographs of multifamily and mixed use projects that have been permitted in surrounding local jurisdictions.

Appendix 1: Maps of 2 growth alternatives



Alt A – Distributed Growth

Alt B – Focused Growth

Distributed via email on April 4, 2024 to Edmonds City Council

Appendix 2: Venn diagrams illustrate the “construction” of a Preferred Alternative in the DEIS

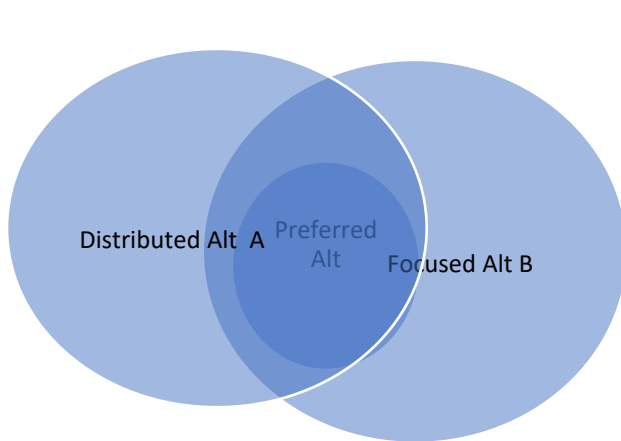


Figure 1: Preferred alternative is amalgam of both alternatives

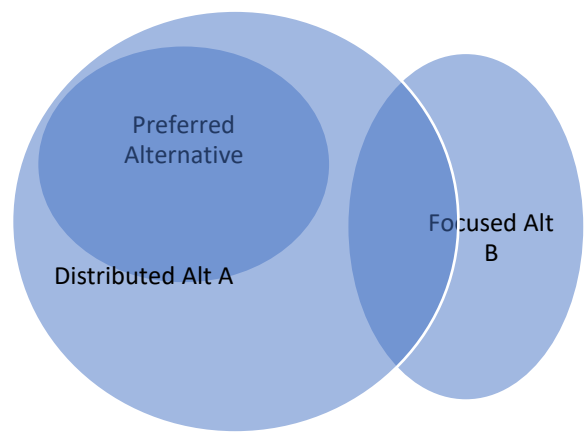


Figure 3: Preferred alternative is subset of Distributed Alternative A

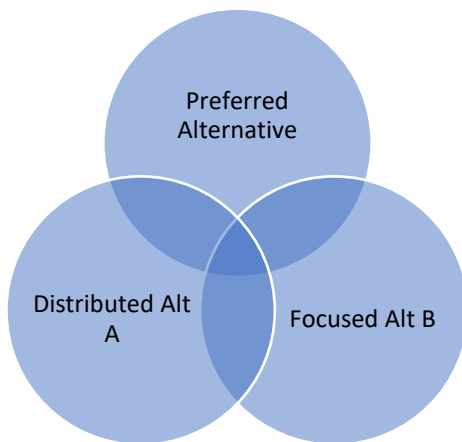


Figure 2: Preferred Alternative has land uses and parcels not studied in the prelim. DEIS and is therefore not SEPA-compliant.

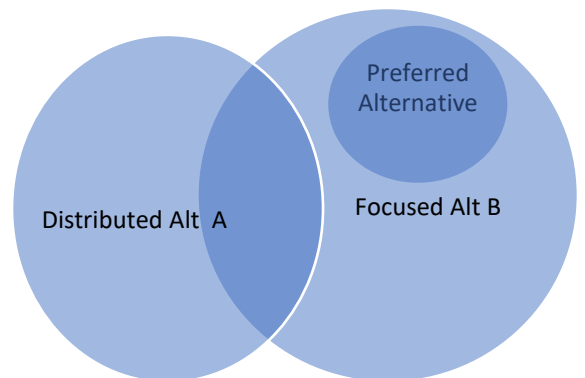
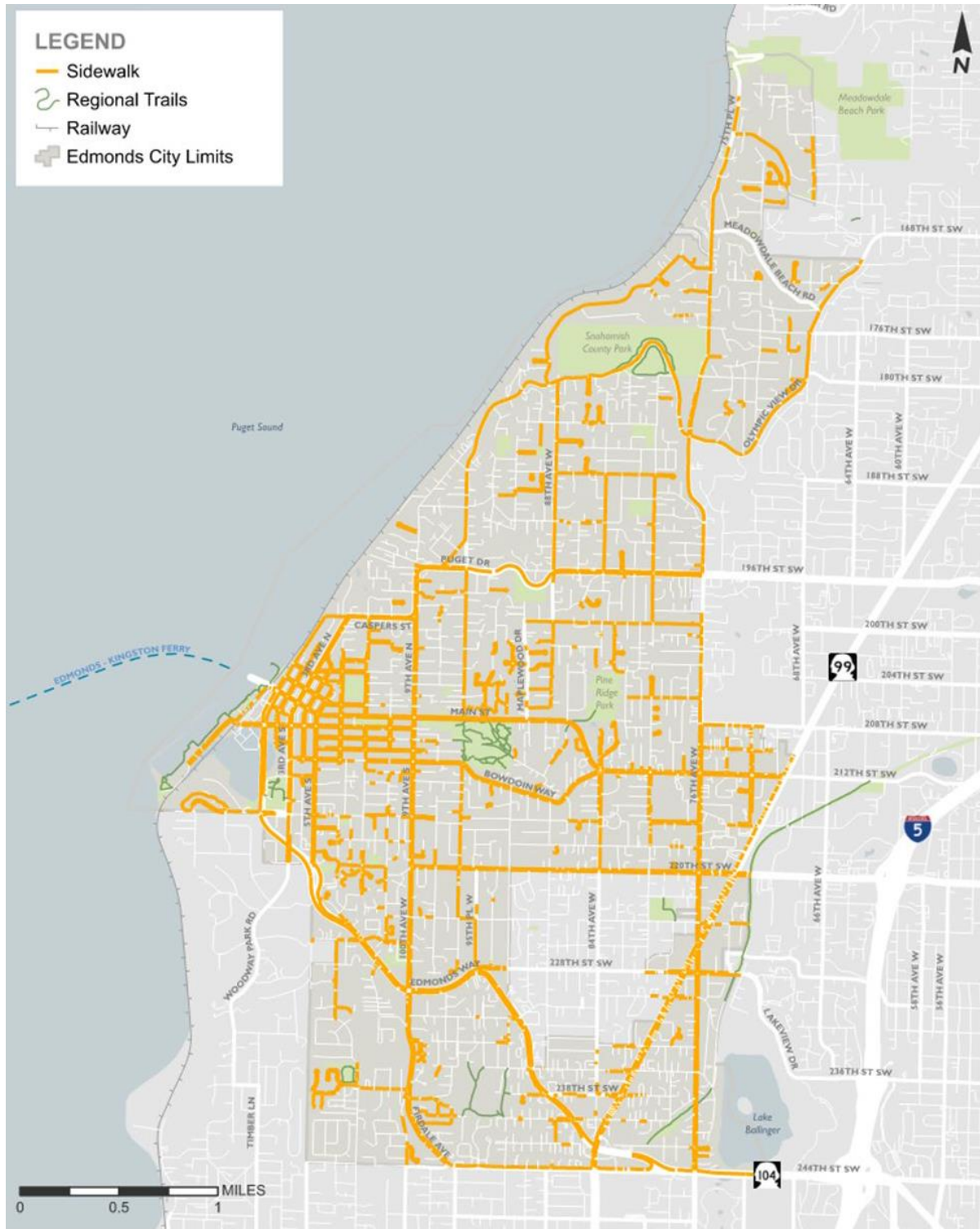


Figure 4: Preferred alternative is subset of Focused Alternative B



Appendix 4 - List of Churches, parcel size, estimated housing units if redeveloped to 2 story multifamily units.

Discussion:

Only parcels greater than 2 acres are included in the distributed growth alternative.

Two Churches have one half the total acreage in this table: United Methodist and Westgate Chapel.

Holy Rosary Church in the Bowl is not included due proximity to Shell Creek and the GMA guidelines about handling sensitive areas.

The factor for number of apartment units per acre (30) is from the land use definitions in the 2020 Comp Plan for low rise multi family buildings.

Church Name	Address	Acres	NOTES
CALVARY CHAPEL	8330 212th St SW	1.96	In 5 corners district- don't double count
Edgewood Baptist Church	20406 76th Ave	3.02	same address as Mosaic Community Church North
Maplewood Presbyterian Church	19523 84th	2.73	
Olympic Baptist Church	8713 220th	3.68	same address as Iglesia Cristiana Cristo Vive
St Albans Parish	21405 82nd Pl W	2.39	In 5 corners district - don't double count
United Methodist Church	828 Caspers	6.17	
WESTERN WASH SEVENTH-DAY ADVENTISTS	8625 196TH ST SW	2.94	same address as Edmonds Adventist
Westgate Chapel	22901 Edmonds Way	5.02	includes parking area on north side of 228th

23.56 total acres without St. Albans, Calvary

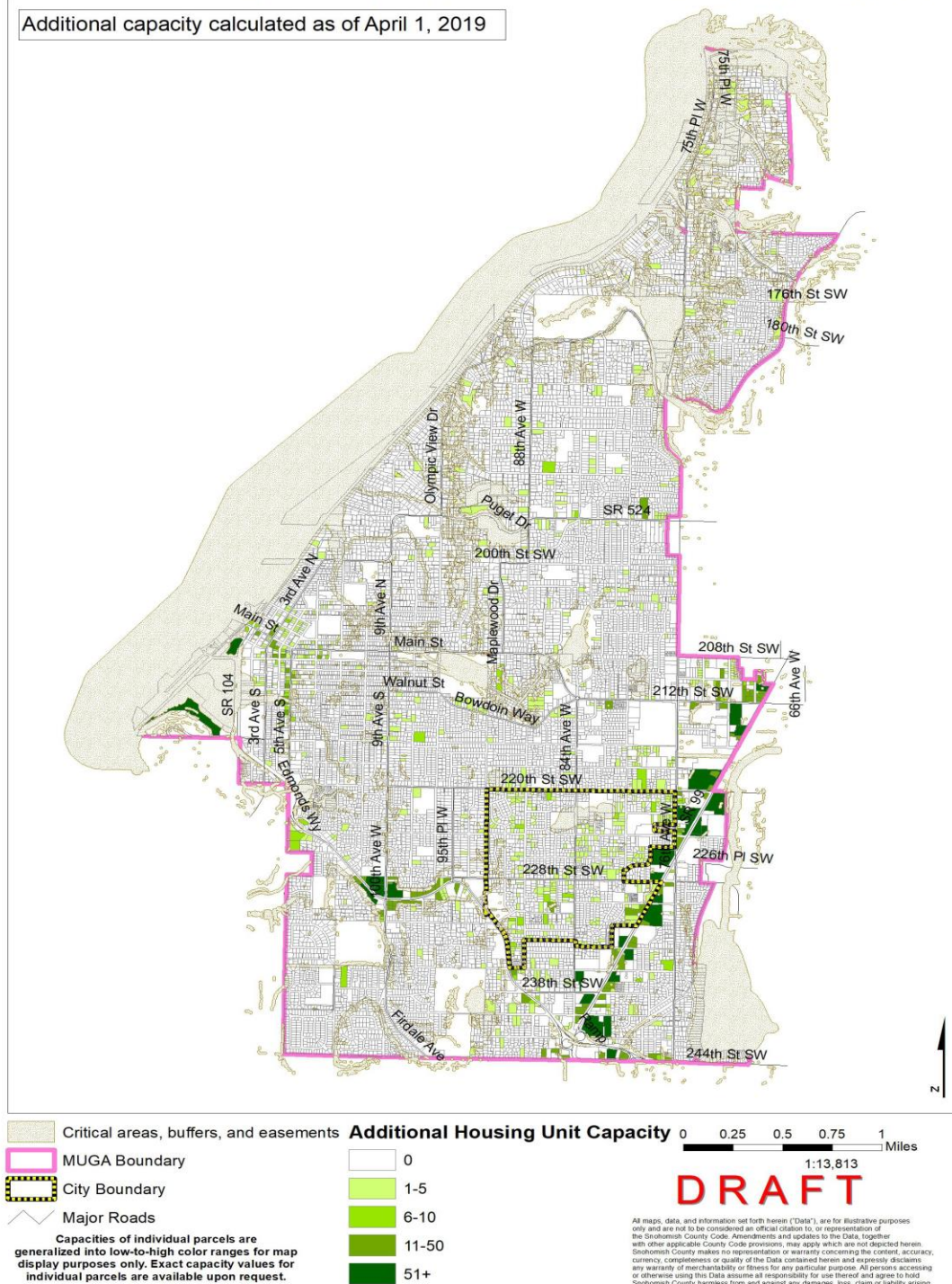
30 factor for units per acre

700	rounded number of housing units
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Appendix 5 - Existing housing capacity map from the Snohomish County Buildable Lands report, 2019. This maps **4862** housing units, about **3000** of which are in the Hwy 99 corridor. It is derived from the city's current zoning map. It is not a reflection of future policies on where density can be added.

Additional Housing Unit Capacity **DRAFT** Edmonds MUGA

Additional capacity calculated as of April 1, 2019



Appendix 6 – Do the math on the number of housing units to plan for. Edmonds regularly plans for housing growth. In 2017 the Hwy 99 corridor was upzoned from 35 ft or 60 ft to 75 feet and the land use designation was changed to the most flexible category in the city: CG – Commercial General- to accommodate the City's allocation of housing growth for future Comp Plan cycles. This table puts the capacity in the Hwy 99 corridor in perspective with the rest of the city. It is also a stepping off point for recommendations in this whitepaper to exclude environmentally sensitive areas from both growth alternatives.

Number of housing units	Description
9000	allocation from County level planning process
-3000	estimated capacity in Hwy 99 subarea. Some of these could be redistributed.
-1862	estimated capacity from 2021 buildable lands report that is not in Hwy 99 subarea
4138	subtotal of additional units to plan for, before the effect of the State housing bills
1642	HB 1337 on ADU's; two per parcel
42	HB 1110 on middle density housing
2454	HB 1220 on planning for all affordability levels. (this is the most impactful housing bill for Edmonds density planning)
4138	sub total of units to plan for within the constraints of the State housing bills
	Recommended exclusions due to environmental sensitivity. These units must be planned for in other neighborhoods.
50	Estimated Perrinville growth in buildable lands report.
246	Unocal site rezone from Master Plan development to Open Space
296	Subtotal of units to plan for in addition to the housing bill requirements.
	Housing Units to plan for in the 2 growth alternatives
2454	See HB 1220 line above.
296	housing units in 2 environmentally sensitive areas to redistribute
2750	Total housing units planned in each growth alternative bookend.

Appendix 7 –link to GIS map application

https://maps.edmondswa.gov/Html5Viewer/?viewer=Edmonds_SSL.HTML

The reader can navigate to the city's GIS map and manipulate the layers to examine the stormwater pipe network (and observe parcels with no pipe or catch basin), the sanitary sewer system, the critical areas, the large number of watersheds, and other physical features of the city. (Refer to the appendix in this document for the sidewalk map since it is not a GIS map overlay.)

Discussion:

Such examination of the physical features of Edmonds will inform the reader of the need to use more of a 'scalpel' approach rather than a 'cleaver' approach in planning for increased housing density, and the resultant capital budget demands for expanding the capacity of the utilities. It is a core principle of Washington's Growth Management Act (GMA) that growth is planned in the areas that already have the resources that are necessary. It is not in keeping with the intent of the GMA to spread density all over the city, itemize the new capital investments needed to mitigate the impact of that growth in the Final EIS, and then in the future declare that the city has inadequate fiscal resources to make the investments so that the mitigations are never delivered.

Appendix 8 – Photo Gallery

This is a gallery of High Rise Multi family, High Rise Mixed Use, Mid Rise market rate, and Mid Rise Affordable buildings in the region. These projects are either built or permitted as of the date of this whitepaper. These photos are not a substitute for visiting completed projects in Mountlake Terrace, Lynnwood, or Shoreline and experiencing the mass of the tall building from the sidewalk.

There are low rise multifamily apartment buildings in most every neighborhood of Edmonds and it is assumed the reader does not need photos in order to visualize that land use type. They are not included.

These photos illustrate the pro's and con's of the mass of High Rise buildings in a potential Uptown Town Center.

There is a marked difference in the street appeal of the building photos in Kirkland versus South Everett. But it is outside the scope of this white paper to discuss site and building design requirements that yield attractive buildings with human scale features at the sidewalk level.



Village at Totem Lake, Kirkland. A town center redevelopment project. High Rise mixed use.



Swyft, Kirkland. High Rise Mixed Use_8-16 story_313 units and medical offices



Shoreline III at 145th St light Rail station. High Rise Mixed Use_8 story_360 units



Polaris, Kirkland. Affordable housing_High Rise Mixed Use_8 story_440 units



3 photos of Modera Shoreline. Midrise_Multi Family_7 story_400 units



A step back design in Modera rising to 7 stories with an entry designed to transition to the surrounding R4/R6 parcels



Modera Shoreline



Issaquah Town Center has Midrise Mixed Use buildings (est. 50 feet) abutting single family homes



Hillsboro, OR_Midrise MF_3 story_58 unit townhome rentals



Gresham, OR Midrise MU_4 story_318 units_public plaza at train station



Seattle's Northgate Bus/Light rail station has a Midrise MU_235 unit_affordable housing project with a day care center on the ground floor (no parking spaces)



Four Corners building is Midrise MF affordable housing_6 story_430 units at Hwy 526 and Evergreen Way (the Boeing Everett Plant's neighborhood)