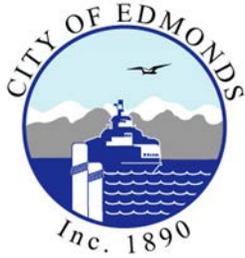


**PLANNED ACTION
FINAL ENVIRONMENTAL IMPACT STATEMENT**
for the
HIGHWAY 99 SUBAREA PLAN

City of Edmonds
Department of Development Services

Date of Final EIS Issuance
August 4, 2017



CITY OF EDMONDS

121 5th Avenue North, Edmonds WA 98020

Phone: 425.771.0220 • Fax: 425.771.0221 • Web: www.edmondswa.gov

DEVELOPMENT SERVICES DEPARTMENT • PLANNING DIVISION

June 2, 2017

Dear Interested Citizen:

The City of Edmonds has completed the Highway 99 Subarea Plan Final Planned Action Environmental Impact Statement (EIS), prepared in accordance with the Washington State Environmental Policy Act (SEPA). The proposal considered in this EIS is a new subarea plan, along with supporting comprehensive plan amendments and supporting regulatory amendments intended to support increased economic vitality, promote new opportunities for housing and employment, and provide for enhanced multi-modal mobility throughout the Highway 99 study area.

The proposal would also designate the SR 99 study area analyzed in this EIS as a Planned Action area. If so designated, further environmental review on future development within the designated Planned Action area would not be necessary for development proposals that are consistent with the adopted Planned Action ordinance.

This EIS considers two alternatives:

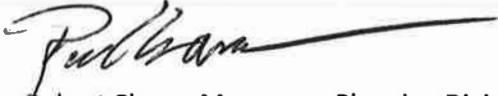
- **Alternative 1 – No Action**, future growth consistent with existing land use and zoning designations; and
- **Alternative 2 – Preferred Alternative**, future mixed use growth supported by a comprehensive set of multi-modal transportation improvements on SR 99, an area-wide rezone allowing greater intensity of development and amended development regulations to include new design standards.

The study area considered in this EIS consists of approximately 335 acres that follow the alignment of SR 99 through Edmonds, bounded on the south by the King/Snohomish county boundary line on the south and 210th Street SW on the north. To the east and west, the planning area follows an irregular boundary established by existing development patterns in the City of Edmonds and the boundaries of the adjoining cities of Lynnwood, Mountlake Terrace, Shoreline and Snohomish County.

This EIS identifies environmental impacts and mitigating strategies for each alternative. Environmental issues evaluated in this EIS include: land use, plans and policies; aesthetics; transportation; and public services and utilities.

Thank you for your interest in the SR Highway 99 Subarea Plan Planned Action EIS. We welcome your comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Chave", with a long horizontal flourish extending to the right.

Robert Chave, Manager – Planning Division
SEPA Responsible Official
City of Edmonds Development Services

FACT SHEET

NAME OF PROPOSAL

Highway 99 Subarea Plan

PROPONENT

The proponent is the City of Edmonds.

LOCATION

The area considered in this Draft EIS is the SR 99 study area, an approximately 335-acre area that follows the SR 99 alignment and is bounded by the King/Snohomish county line on the south, 210th Street SW on the north, and an irregular boundary established by existing development patterns in the City of Edmonds and the boundaries of the cities of Lynnwood, Mountlake Terrace and Shoreline and Snohomish County on the east and west.

PROPOSAL

The City of Edmonds proposes the following related actions:

1. Adoption of a Highway 99 Subarea Plan, consistent with the City's Comprehensive Plan and Washington State Growth Management Act (GMA).
2. Adoption of Comprehensive Plan amendments to reflect the updated map and text in the Highway 99 Subarea Plan.
3. Adoption of an area-wide rezone that would generally apply the CG zone to most of the study area.
4. Adoption of amendments to development standards to implement the Subarea Plan, including:
 - a. Maximum building height in CG zone
 - b. Transit supportive parking standards
 - c. Minimum building frontage and transparency requirements along the primary street frontage
 - d. Parking area location
 - e. Pedestrian Activity Zone designation along all street frontages
 - f. Upper story setbacks adjacent to single family zones
5. Adoption of an ordinance designating the Highway 99 Subarea as a Planned Acton for the purposes of SEPA compliance pursuant to RCW 43.21.031(2)(a) and WAC 197-11-164.

A Planned Action designation by a jurisdiction reflects a decision that environmental review is completed early in the planning stages for an area and/or specific type of project. Further environmental review under SEPA, for each specific development proposal or phase, will not be necessary if it is determined that each proposal or phase is consistent with the Planned Action ordinance.

PROPOSED ALTERNATIVES

Two action alternatives representing varying approaches for accommodating increased development intensity within the Highway 99 study area are evaluated in this Draft EIS, together with a No Action Alternative. The alternatives include:

- **Alternative 1 (No Action).** This alternative assumes continued future growth consistent with past development trends.
- **Alternative 2 (Preferred Alternative).** Compared to the No Action Alternative, the Preferred Alternative would support increased intensity of future mixed use growth along the corridor. Future growth would be supported by a comprehensive set of multi-modal transportation improvements on SR 99 and regulatory amendments that would enhance the street-level pedestrian environment and increase the potential for development of affordable housing.

LEAD AGENCY

City of Edmonds
Department of Development Services

SEPA RESPONSIBLE OFFICIAL

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City of Edmonds Development Services
121 5th Avenue North
Edmonds, WA 98020

EIS CONTACT PERSON

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Edmonds, WA 98020 brad.shipley@edmondswa.gov

REQUIRED APPROVALS AND/OR PERMITS

The following City actions would be required to implement the Proposal:

- Adoption of the Highway 99 Subarea Plan and supporting regulatory amendments; and
- Adoption of a Planned Action Ordinance.

Prior to City action, the State of Washington Department of Commerce will coordinate state agency review of the legislative proposal.

After City action, the likely permits to be acquired by individual development proposals include but are not limited to: land use permits, construction permits, building permits, and street use permits.

AUTHORS AND PRINCIPAL CONTRIBUTORS TO THIS EIS

This **SR 99 Subarea Plan Planned Action EIS** has been prepared under the direction of the City of Edmonds Department of Development Services. Research and analysis associated with this EIS were provided by the following consulting firms:

- **3 Square Blocks** – lead EIS consultant; document preparation; environmental analysis – land use, relationship to plans and policies, aesthetics, public services and utilities
- **DKS** – transportation
- **Fregonese Associates** – subarea plan, subarea plan alternatives data, graphics, development scenarios

LOCATION OF BACKGROUND DATA

City of Edmonds, Development Services
121 5th Avenue North
Edmonds, WA 98020

DATE OF ISSUANCE OF THE FINAL EIS

August 4, 2017

APPEAL PERIOD ENDS

August 18, 2017

DATE OF ISSUANCE OF THE DRAFT EIS

June 2, 2017

DATE DRAFT EIS COMMENTS WERE DUE

July 3, 2017

AVAILABILITY OF THIS FINAL EIS

Copies of this Final EIS have been distributed to agencies, organizations and individuals noted on the Distribution List (Appendix A to this document). Notice of Availability of the Final EIS has been provided to organizations and individuals that requested to become parties of record.

A limited number of paper copies of this Final EIS are available – while the supply lasts – from the City of Edmonds Department of Development Services. Purchase price will be based on printing costs.

This Final EIS and the appendices are also available online at the City's website <http://www.edmondswa.gov/2011-07-27-22-31-43/highway-99-planning-project.html> and the project website <http://www.edmondshwy99.org/document-library/>.

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CHAPTER 1 SUMMARY

1.1 INTRODUCTION

This Chapter summarizes elements of the proposed Highway 99 Subarea Plan Planned Action Environmental Impact Statement (EIS), including the purpose of the proposal and alternatives, a comparison of the impacts of the alternatives, and a summary of potential mitigation measures to reduce environmental impacts.

This Chapter is the first of a series of chapters contained in the EIS that provide a summary and more in-depth environmental review of the proposal and alternatives:

- **Chapter 1 Summary:** Summary of proposal, impacts, and mitigation measures contained in Chapters 2 and 3.
- **Chapter 2 Alternatives:** Comprehensive description of the proposal and alternatives including projected growth, proposed changes to land use and zoning designations, and proposed transportation improvements.
- **Chapter 3 Preferred Alternative Analysis:** Evaluates the potential impacts of development that may result from the Preferred Alternative described in Chapter 2. Addresses general or cumulative impacts on the natural or built environment that could result from the Preferred Alternative in comparison to the No Action Alternative.
- **Chapter 4 Comments and Responses:** lists comments and responses received during the comment period
- **Chapter 5 References:** A list of documents and personal communications cited in the EIS.
- **Appendices:** Technical information supporting the EIS.

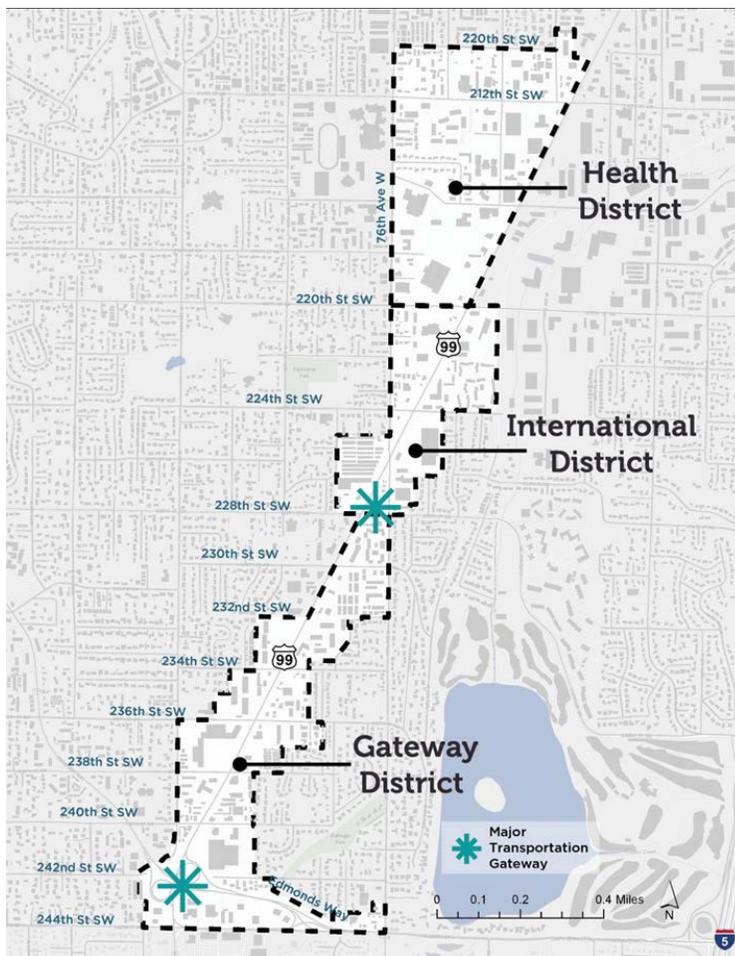
Changes made since publication of the Draft EIS are identified in ~~strikeout~~ and underline.

1.2 STUDY AREA

The Highway 99 Corridor study area extends approximately two miles along the alignment of SR 99, bounded by the King/Snohomish County boundary on the south and 210th Street SW on the north (see Figure 1.1 on the following page). To the east and west of SR 99, the study area follows an irregular boundary established by existing development patterns in the City of Edmonds and the boundaries of the adjoining cities of Lynnwood, Mountlake Terrace and Snohomish County. The study area comprises approximately 335 acres in total.

Within the subarea, three distinct districts have been identified. To the south, the Gateway District is a major entrance to Edmonds from the south and east and provides for relatively large scale commercial or mixed use development. In the central portion of the study area, the International District provides a wide array of restaurant, retail services and other supporting development that meet the needs of diverse cultures. To the north, the Health District includes the Swedish Medical Center/Edmonds and related medical services and offices.

FIGURE 1.1 Highway 99 Corridor Study Area and Districts within the Study Area



Source: Edmonds 2016; Fregonese 2016.

1.3 PROPOSED ACTION

The City is considering an updated subarea plan, new transportation improvements, an area-wide rezone and regulatory amendments to the City Code (Edmonds City Code Title 16) to set the stage for transition of the Highway 99 Corridor study area to a vibrant, pedestrian friendly mixed-use corridor, consistent City direction for the study area.

Specifically, the proposal by the City of Edmonds consists of the following related actions:

1. Adoption of a Highway 99 Subarea Plan, consistent with the City's Comprehensive Plan and Washington State Growth Management Act (GMA).
2. Adoption of Comprehensive Plan amendments to reflect the updated map and text in the Highway 99 Subarea Plan.
3. Adoption of an area-wide rezone that would generally apply the CG zone to most of the study area.
4. Adoption of amendments to development standards to implement the Subarea Plan, including:
 - a. Maximum building height in CG zone
 - b. Transit supportive parking standards
 - c. Minimum building frontage and transparency requirements along the primary street frontage
 - d. Parking area location
 - e. Pedestrian Activity Zone designation along all street frontages
 - f. Upper story stepbacks adjacent to single family zones
5. Adoption of an ordinance designating the Highway 99 Subarea as a Planned Acton for the purposes of SEPA compliance pursuant to RCW 43.21.031(2)(a) and WAC 197-11-164.

1.4 OBJECTIVES OF THE PROPOSAL

The City has identified the following specific objectives of the proposal:

- Establish a clear long-term vision for the Highway 99 corridor that helps guide future public investment decisions, including investments for multimodal improvements to the corridor.
- Encourage a mixture of land uses throughout the Highway 99 corridor, including residential, office, retail, and civic projects.
- Create housing choices attractive to people from all walks of life.
- Create an attractive pedestrian-oriented streetscape environment.
- Provide opportunities for medical services growth in the area surrounding Swedish Medical Center/Edmonds.
- Provide for enhanced mobility for all modes of travel along the Highway 99 corridor.
- Provide a streamlined SEPA review process for future site-specific development proposals.

- Provide an incentive for development proposals that are consistent with the overall intent of the Highway 99 corridor vision.
- Provide greater certainty to potential developers, city decision-makers, and the general public regarding the future development pattern and likely impacts of future development in the SR 99 corridor.

1.5 ENVIRONMENTAL REVIEW

The purpose of this EIS is to assist the public and decision-makers in considering the potential environmental effects of the proposed Subarea Plan and implementing regulations.

SEPA requires government officials to consider the environmental consequences of future actions and to consider ways to accomplish the objectives that minimize adverse impacts or enhance environmental quality. They must consider whether the proposed action will have a probable significant adverse environmental impact on the elements of the natural and built environment.

The adoption of a subarea plan and implementing regulations is classified by SEPA as a non-project (also referred to as programmatic) action. A non-project action is defined as an action that is broader than a single site-specific project and involves decisions on policies, plans or programs. An EIS for non-project proposal does not require site-specific analysis; instead the EIS will discuss impacts and alternatives appropriate to the scope of the non-project proposal and to the level of planning for the proposal.

PLANNED ACTION

A Planned Action EIS provides more detailed environmental analysis during the early formulation stages of planning proposals rather than at the project permit review stage. Future development proposals consistent with an adopted planned action ordinance do not have to undergo an environmental threshold determination, and are not subject to SEPA appeals when consistent with the planned action ordinance, including specified mitigation measures. Planned actions still need to meet the City's development regulations and to obtain necessary permits. Please see Chapter 2 for a complete description of the planned action process.

ENVIRONMENTAL SCOPING

The City Edmonds issued a Determination of Significance (DS)/Scoping Notice for the SR 99 Corridor Plan on May 4, 2016 for the proposed action. Interested citizens, agencies, organizations and affected tribes were invited to submit comments on the scope of the Draft EIS, which closed on May 24, 2016.

The final scope of review for this EIS includes the following:

- **Land Use**, including an evaluation of the amount, type and pattern of uses. The focus of the analysis is on land use compatibility with existing and planned development within and adjacent

to the analysis area. The land use analysis will also include an evaluation of consistency of the proposal with adopted plans and policies.

- **Aesthetics**, including an evaluation of the character of the existing corridor and the nature of change to the urban character that may result from the proposal. The analysis will consider the character of the corridor as whole as well as character at various locations along the corridor.
- **Transportation**, including consideration of impacts of the proposal and alternatives on trip generation, peak hour vehicular congestion, transit, bicycling and walking, park and safety. An analysis of consistency with Washington Department of Transportation standards for the Highway 99 Corridor, a state-designated highway, will also be evaluated.
- **Public Services/Utilities**, including a review of police, fire/emergency services, schools, parks and open space, electricity and stormwater. Existing levels of service, estimated needs and demand for services and measures needed, if any, to respond to projected demand from the proposal are described.

1.6 PUBLIC ENGAGEMENT

The City's public engagement effort engaged with the broad and diverse range of interested parties including area residents, businesses and property owners, community organizations, public entities and agencies, and potential developers or investors. The City has provided multiple ways in which stakeholders can participate, including online, social media, and public workshops and meetings. A brief summary of the City's public engagement activities to-date is provided in Chapter 2 and additional information can be found at the City's project website: <http://www.edmondshwy99.org>.

1.7 ALTERNATIVES

As described to a greater degree in Chapter 2, alternatives addressed in this Draft EIS include Alternative 1, No Action—future growth would continue based on existing development regulations—and Alternative 2, Preferred Alternative—future growth assuming a new vision for the area, updated development standards, enhanced transportation system. Each alternative is briefly described below and key features of the alternatives are summarized in Table 1.1, below.

TABLE 1.1 Alternatives Overview

FEATURES	ALT. 1 NO ACTION	ALT. 2 PREFERRED ALTERNATIVE
New Housing Units by 2035	1,224	3,325
New Jobs by 2035	2,317	3,013
New Commercial ft² by 2035	994,958	1,634,685
Comprehensive Plan	No change	Proposed update to Highway 99 subarea maps and text to clearly identify three distinct districts in the subarea anchored around major transportation gateways and employment clusters, see Figure 1.1.
Zoning Designations	No change	Rezone the CG2 and portions of the RM 1.5, RM-2.4, RM-3, BN, and BC zones throughout the study area to CG (see Figure 1.4)
Development Code Amendments	Existing development regulations would remain unchanged	<p>Building height</p> <ul style="list-style-type: none"> – Increase maximum building height in CG zone from 60 feet to 75 feet <p>Transit supportive parking standards</p> <ul style="list-style-type: none"> – Non-residential: 2 spaces/1,000 leasable sf – Residential: minimum average 0.75 spaces per unit over an entire project – Exempt the first 3,000 feet of sf of commercial within mixed use buildings that have a shared parking plan <p>Building frontage standards</p> <ul style="list-style-type: none"> – On a primary frontage, minimum of 50% of primary street frontage should have buildings within 10 feet of front property line (edge of Pedestrian Activity Zone, see below) – 50% of side and rear frontages to have buildings, walks or hedges at least four feet in height within 10 feet of property lines <p>Building transparency standards</p> <ul style="list-style-type: none"> – 50% of primary building frontage façade within two and 10 feet of height, as measured from the adjacent sidewalk, the bottom of which may not exceed four feet above the adjacent sidewalk, should be transparent windows and doors – All other frontages require 30% transparency – Windows shall not be mirrored or have glass tinted darker than 40%. <p>Parking lot location</p> <ul style="list-style-type: none"> – Parking areas may comprise a maximum of 40% of street frontage

FEATURES	ALT. 1 NO ACTION	ALT. 2 PREFERRED ALTERNATIVE
		<p>Pedestrian Activity Zone</p> <ul style="list-style-type: none"> - Designate 10-foot Pedestrian Activity Zone in place of existing Type IV landscape buffer along all primary street frontages with ground floor retail. Future design standards may consider special circumstances, such as auto dealer locations. <p>Ground Floor Setback</p> <ul style="list-style-type: none"> - For frontages on Highway 99, require a front setback of 10 feet to accommodate a Pedestrian Activity Zone - For frontages not on Highway 99, reduce frontage setbacks to five feet and encourage enhanced pedestrian realm (larger sidewalks, usable landscaping, etc.) - Keep current 15-foot setback and 10- foot landscaping requirements for lot lines adjacent to single family zones <p>Upper story stepbacks</p> <ul style="list-style-type: none"> - Adjacent to single family zones provide 10-foot upper story stepback for the portion of the building above 25 feet. Provide 20-foot upper-story stepback from the lot line for the portion of the building above 55 feet. - Across the street from single family zones provide eight-foot stepback for the portion of the building above 25 feet. Provide 16-foot upper story stepback from the lot line for the portion of the building above 55 feet.
Transportation Improvements	Future improvements would continue to occur on an incremental basis with new development and as planned by the City's Transportation Master Plan and WSDOT plans.	Improvements to the Highway 99 Corridor and adjacent local streets would include measures to maintain level of service standards, increase east/west connectivity, provide greater bicycle and pedestrian mobility, and improve access to transit. See Appendix B.

Source: Edmonds 2016; Fregonese 2016; 3 Square Blocks 2016.

ALTERNATIVE 1 NO ACTION

FUTURE GROWTH AND DEVELOPMENT PATTERNS

Alternative 1, the No Action Alternative, would continue the current Comprehensive Plan land use designations and zoning classifications with no changes. Future growth would occur according to existing land use designations, zoning designations and development standards. See Figure 1.2 for existing zoning designations.

As shown in the table above, Alternative 1 plans for the less growth in new employment and housing through 2035, compared to the Preferred Alternative (Alternative 2). Alternative 1 also plans for relatively more new commercial uses compared to residential uses. Accordingly, commercial development would continue to be the primary use along the corridor. The corridor's existing auto-oriented commercial character, with large paved areas and limited amenities for pedestrians, bicycles and transit users, would likely continue in the future.

Comprehensive Plan

No changes are proposed to existing maps or text.

Zoning Designations

No changes are proposed to existing zoning designations.

Development Regulations

No changes are proposed to development standards or regulations.

Building Heights

Existing development regulations in the GC and GC2 zones, the zones found along the Highway 99 Corridor, allow maximum building heights of 60 and 75 feet, respectively, except in the high-rise nodes, where building heights are not limited (see Figure 1.3). In most cases, however, building heights of existing development is significantly less than these maximum limits. Under Alternative 1, it is likely that future development would continue this pattern and new development would consist of relatively low scale and low intensity auto-oriented uses.

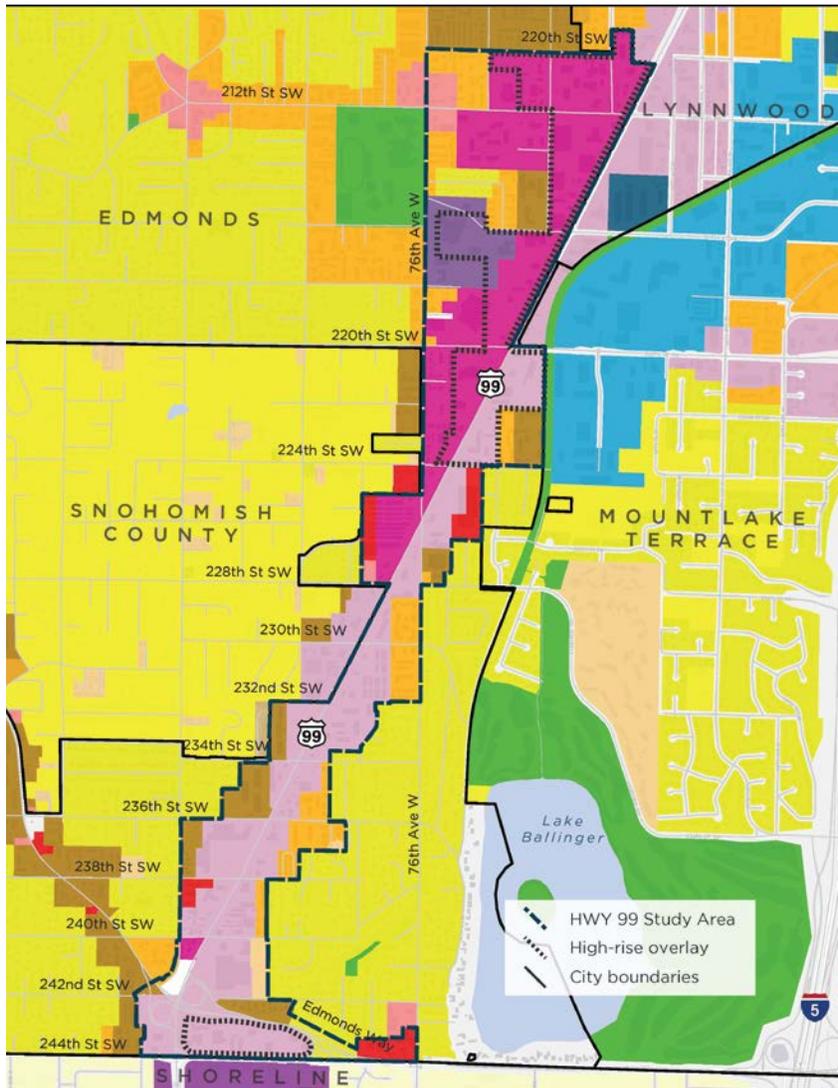
TRANSPORTATION

No new transportation improvement projects to improve pedestrian character, access or mobility are planned. Improvements would continue to occur on an incremental basis, depending on private development proposals and available capital funding through the City of Edmonds and WSDOT.

SEPA REVIEW

A Planned Action Ordinance would not be adopted and proposed future development would be subject to standard SEPA review for individual site-specific proposals.

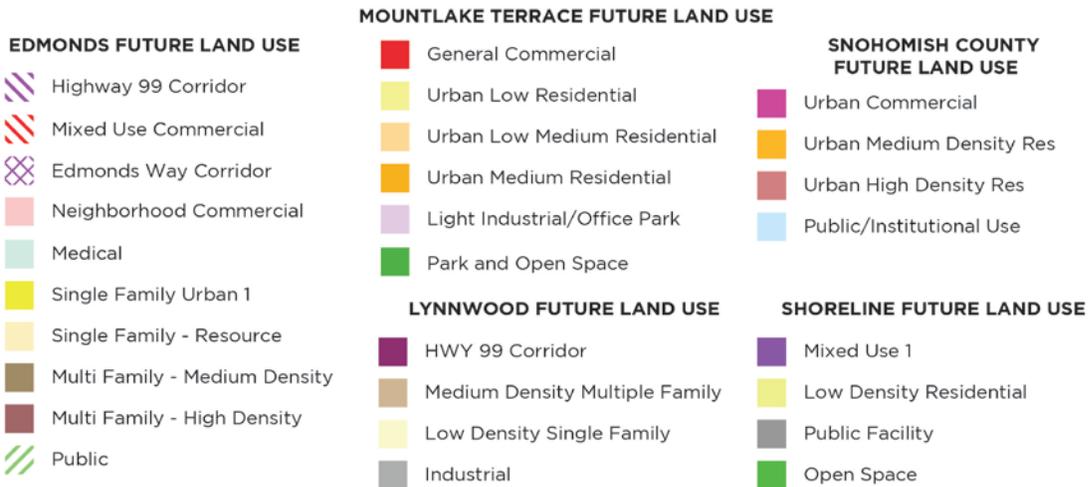
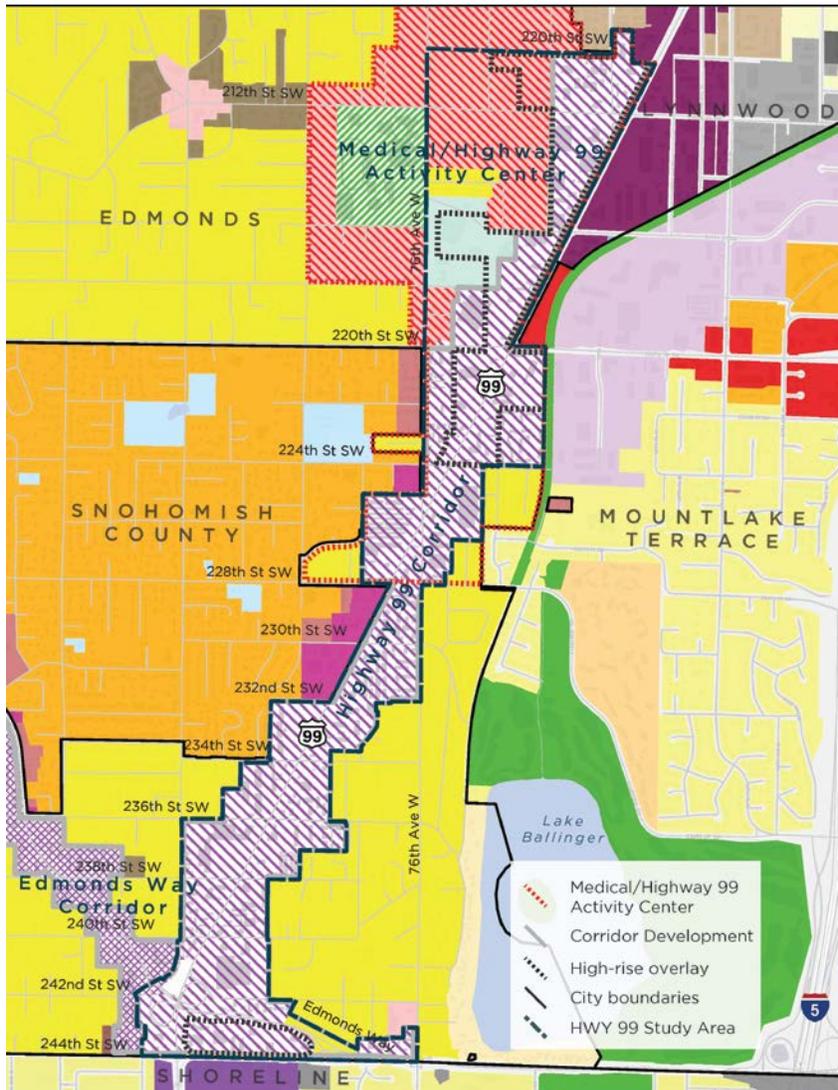
FIGURE 1.2 Study Area and Adjacent Areas Existing Zoning



EDMONDS ZONING	MOUNTLAKE TERRACE ZONING	SNOHOMISH COUNTY ZONING
 CG2 - General Commercial 2	 R-8,400 - Residential 8,400 sq ft	 R-8,400 - Residential 8,400 sq ft
 CG - General Commercial	 R-7,200 - Residential 7,200 sq ft	 R-7,200 - Residential 7,200 sq ft
 BN - Neighborhood Business	 RML - Multi Res Low Density	 MR - Multiple Residential
 BC - Community Business	 RMM - Multi Res Medium Density	 LDMR - Low Dens Multi Res
 RS-8 - Single Family, 8,000 sq. ft.	 CG - General Commercial	 GC - General Commercial
 RM-3 - Multi Family, 3,000 sq. ft.	 LI/OP - Light Industry/Office Park	 PCB - Planned Community Business
 RM-2.4 - Multi Family, 2,400 sq. ft.	 Recreation and Park District	
 RM-1.5 - Multi Family, 1,500 sq ft		
 MU - Medical Use	SHORELINE ZONING	LYNNWOOD ZONING
 P - Public Use	 MB - Mixed Business	 RS-8 - Residential 8,400 sq ft
	 R-6 - Residential, 6 units/acre	 RMM - Multi Res Medium Density
		 CG - General Commercial
		 BTP - Business/Technical Park

Source: Edmonds 2016; Fregonese 2016.

FIGURE 1.3 Edmonds Comprehensive Plan Land Use Map



Source: Edmonds 2016; Fregonese 2016.

ALTERNATIVE 2 PREFERRED ALTERNATIVE

FUTURE GROWTH AND DEVELOPMENT PATTERNS

Alternative 2, the Preferred Alternative, proposes redevelopment of the study area into an area characterized by mixed use development with an increase in residential development and character, greater intensity of development and street-frontage and pedestrian amenities. Compared to the Alternative 1, Alternative 2 plans for significantly higher levels of residential and employment growth in the study area (see Table 1.1 above). Under Alternative 2, the study area would evolve toward a land use pattern that is relatively more balanced between residential and commercial uses, compared to existing conditions.

Comprehensive Plan

The current Comprehensive Plan includes a Highway 99 subdistrict map that designates four focus areas, but does not reflect community interest in a southern “gateway” district that defines the entry into Edmonds. The proposal would establish three focus areas, consisting of a hospital district at the north end, international district in the center and gateway district in the south. Alternative 2 would include map and text updates to the Comprehensive Plan to clearly identify these three distinct districts, see Figure 1.1 on page 2.

Zoning Designations

Alternative 2 would include an area wide rezone of all of the CG2 and portions of the RM-1.5 RM-2.4, RM-3, BC, and BN zoned areas in the study area to the CG zoning designation, see Figure 1.4.

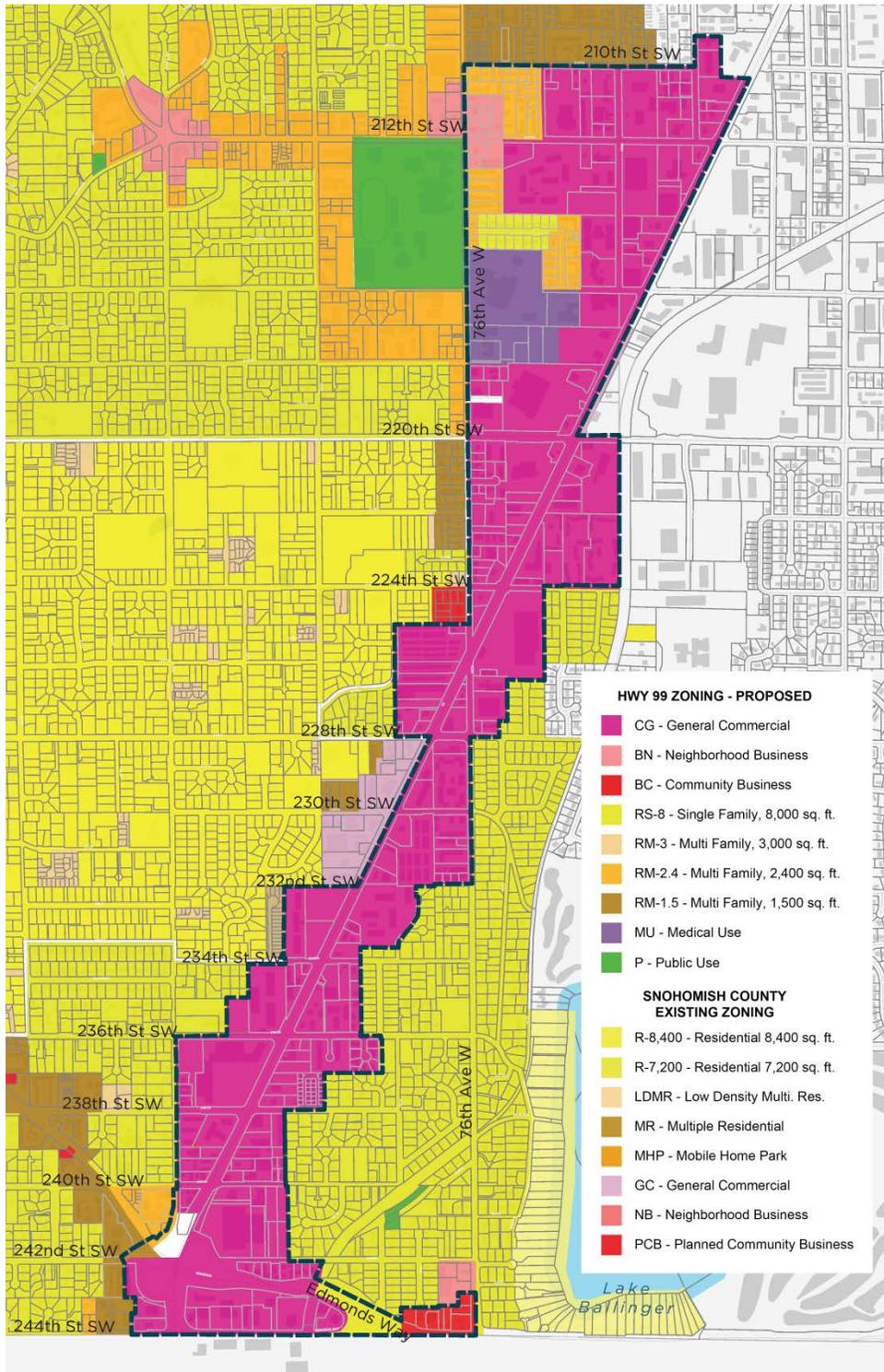
Development Regulations

Edmonds Community Development Code Section 16.60 would be amended to include the revised development code standards shown in Table 1.1.

Building Heights

The proposed height limit in the CG zone is proposed to increase to 75 feet, except within the adopted high rise overlay. The proposed height increase is greater than the existing 60-foot height limit for the CG zone and consistent with the current height limit for the CG2 zone. Some areas that are proposed for rezone to CG are currently in a zoning designation, such as the BC or RM zones, with a 25-foot height limit. The proposed area-wide rezone would allow these locations to re-develop at a maximum height of 75 feet, consistent with proposed CG development standards.

FIGURE 1.4 Preferred Alternative Proposed Zoning Designations



Source: Edmonds 2016; Fregonese 2016.

TRANSPORTATION

Transportation improvements to the Highway 99 corridor and adjacent local streets would include measures to maintain level of service standards, increase east/west connectivity, provide greater bicycle and pedestrian mobility, and improve access to transit. Proposed transportation projects would specifically address the following categories of improvements:

- Pedestrian safety and access to SR 99
- Bicycle circulation across and parallel to SR 99
- Pedestrian environment along SR 99
- Safe pedestrian crossings of SR 99 and transit access
- Transit mobility and transit stop environment
- Traffic flow and safe access management

A detailed description of proposed transportation improvement projects is included in Appendix B.

1.8 MAJOR ISSUES, SIGNIFICANT AREAS OF CONTROVERSY AND UNCERTAINTY, AND ISSUES TO BE RESOLVED

The major issues to be resolved and under review in this EIS include:

- Future neighborhood identity, urban form and character as expressed through the community vision, zoning classifications and development regulations;
- Appropriate mix of uses, including residential, office, retail and civic uses;
- Planned transportation network improvements, including multimodal circulation and connectivity, measures; and
- Capacity for public services and utilities to serve anticipated growth.

1.9 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

This section contains an abbreviated version of Chapter 3, which contains the full text of the Affected Environment, Significant Impacts, and Mitigation Measures sections. For more information, readers are encouraged to review the more comprehensive discussion of issues in Chapter 3 in order to gain a more complete understanding of impacts associated with the alternatives.

IMPACTS

TABLE 1.2 Summary of Impacts of the Alternatives

ELEMENT OF THE ENVIRONMENT	IMPACTS COMMON TO BOTH ALTERNATIVES	IMPACTS OF ALTERNATIVE 1 NO ACTION	IMPACTS OF ALTERNATIVE 2 PREFERRED ALTERNATIVE
Land Use	<p>Growth is assumed to occur under both alternatives. The alternatives differ in the intensities, types of uses, and design of future development, as well as subsequent impacts on land use patterns, land use compatibility and employment and housing mix. Under both alternatives, the locations where the highest buildings heights would be allowed are the same.</p> <p>Under both alternatives it is anticipated that zoning regulations would provide sufficient development capacity to meet the City’s 2035 growth targets for the study area.</p>	<p>The future land use pattern under Alternative 1 is anticipated to be similar to the existing pattern in terms of the mix of uses and intensity of development, because there would be no changes to the City’s current development regulations and Alternative 1 has the lowest growth targets.</p> <p>Existing development does not fully utilize the development capacity available under current zoning, and thus new development and redevelopment may be at greater intensities than currently exist. There would likely be some incremental increases in development intensity as individual projects were constructed over time in various locations throughout the study area. Development and design standards in the City’s code would help to mitigate for potential land use compatibility impacts.</p> <p>Proposed growth targets would slightly reduce the current ratio of jobs to housing units from 2.4 to 2.2, maintaining the study area’s character as an employment center.</p>	<p>Alternative 2 proposes higher growth targets, an area-wide rezone, new development standards, planned transportation improvements and new policy guidance to catalyze transformation of the study area into a lively, pedestrian- and transit-friendly mixed use corridor.</p> <p>Infill development would likely be of greater height, bulk and intensity than under Alternative 1.</p> <p>The area-wide rezone would result in the majority of the study area being able to develop with a mix of uses and buildings up to 75 feet tall. The rezone would also remove some of the existing transitional zones between areas of the study area where higher intensities are permitted and surrounding single family residential neighborhoods. Alternative 2 includes new upper story stepback standards to address this.</p> <p>Proposed new development standards and transportation improvements are expected to result in a land use pattern that is more pedestrian-friendly, and are not expected to create any new land use incompatibilities.</p> <p>Policy language in the proposed Subarea Plan also encourages transit-oriented development, affordable housing, mixed use and mixed income developments. The impacts of this policy language will depend upon how it is implemented but are not expected to create any new land use incompatibilities, since these types of development are already possible in the study area.</p> <p>Proposed growth targets would change the current ratio of jobs to housing units from 2.4 to 1.4, creating</p>

ELEMENT OF THE ENVIRONMENT	IMPACTS COMMON TO BOTH ALTERNATIVES	IMPACTS OF ALTERNATIVE 1 NO ACTION	IMPACTS OF ALTERNATIVE 2 PREFERRED ALTERNATIVE
			<p>a more equal balance in jobs and housing compared to existing conditions and to growth planned under Alternative 1.</p>
<p>Plans and Policies</p>	<p>Both alternatives are generally consistent with adopted plans and policies reviewed in this EIS. Both alternatives plan for growth according to adopted local and regional targets and are consistent with land use designations in surrounding jurisdictions.</p>	<p>Impacts would be as described under Impacts Common to Both Alternatives.</p>	<p>Under Alternative 2, existing Highway 99 Corridor subdistrict maps and text in the Comprehensive Plan would not be consistent with the recommendations of the proposed Subarea Plan. The proposed Subarea Plan recommends Comprehensive Plan amendments to bring the maps and text into alignment with the Subarea Plan recommendations.</p>
<p>Aesthetics and Urban Design</p>	<p>Growth is assumed to occur under both alternatives and over time this would impact the aesthetic character of the area. Although the alternatives differ in the intensities, locations and types of uses assumed for future growth, a more dense future land use pattern that makes fuller use of available development envelopes than in the past is expected under both alternatives. The locations where the highest buildings heights would be allowed are the same under either alternative.</p> <p>There would be overall improvements in the aesthetic appearance of the study area as new development occurs under both alternatives, but the types of improvements would differ. Improvements under Alternative 1 would be subject to the City's current design and development standards. Improvements under Alternative 2 would be guided by new design and development standards and would also be influenced by new policy guidance and transportation improvement projects in the proposed Subarea Plan.</p>	<p>Growth under existing development regulations would result in incremental increases in density and improvements in aesthetics. This may or may not include individual projects that support the Highway 99 Corridor focus areas described in the Comprehensive Plan.</p> <p>Existing development regulations in much of the study area allow building heights of 60 feet or more. Most existing buildings are significantly shorter than these maximum limits and it is assumed that future development would continue this pattern. There would be some incremental increases in development intensity as individual projects were constructed over time in various locations throughout the study area, but no significant changes are anticipated to current patterns in building height, bulk and scale.</p> <p>As growth occurred over time the streetscape would be improved on a project by project basis consistent with current regulations. Such</p>	<p>Alternative 2 proposes changes to the Comprehensive Plan Highway 99 Corridor focus areas, new policy guidance for the urban form of the study area, higher growth targets, an area-wide rezone, new development standards and planned transportation improvements. These changes are intended to help transform the aesthetics and urban design of the study area into a more vibrant urban corridor with a distinct identity and unique neighborhoods that are pedestrian- and transit-friendly. In general, the impacts are expected to be positive and to support the community's vision for the study area.</p> <p>Alternative 2 would amend the Comprehensive Plan to establish three focus areas in the study area, refining the existing Highway 99 Corridor focus areas to reflect current community interest in a southern gateway district.</p> <p>The proposed Subarea Plan contains new policy guidance calling for improvements in signage and wayfinding, using design to strengthen business opportunity, development of a unique district design identity, supporting building types and uses typical of vibrant urban corridors, and making code updates to support more pedestrian- and transit-friendly</p>

ELEMENT OF THE ENVIRONMENT	IMPACTS COMMON TO BOTH ALTERNATIVES	IMPACTS OF ALTERNATIVE 1 NO ACTION	IMPACTS OF ALTERNATIVE 2 PREFERRED ALTERNATIVE
		<p>improvements could include increased landscaping and pedestrian infrastructure.</p>	<p>building forms and streetscapes.</p> <p>Alternative 2’s proposed higher growth targets and new design and development standards could result in more intense height, bulk and scale of new development in the study area compared to future growth under Alternative 1; building heights of up to 75 feet would be permitted in the majority of the study area. The proposed rezone would also remove some of the existing transitional zones between the study area and surrounding single family residential neighborhoods. The proposed development regulations include new upper story stepback standards in areas adjacent to single family zones to provide transitions in building height and scale.</p> <p>Proposed design and development standards would transform the study area’s streetscape as new development takes place over time; they include increased minimum setbacks to allow space for a new Pedestrian Area between buildings and streets, new requirements for building site placement and transparency, and changes to parking requirements. Additionally, proposed transportation improvements would increase pedestrian, bicyclist and transit infrastructure. These changes would support more street-level activity with people walking or biking to services and jobs.</p>
Transportation	<p>Transportation demand would increase under both alternatives. The change in demand is expected to differ between the alternatives, but there would be some similarities. Both alternatives are expected to have significant impacts on traffic level of service at one or more of the six study intersections in the subarea, to increase corridor travel time, and to have positive impacts on pedestrian, bicycle and transit modes of transportation.</p>	<p>Traffic level of service is projected to fall below the City’s established standard for one of the six study intersections: State Route 99 and 212th Street SW.</p>	<p>Traffic level of service is projected to fall below the City’s established standard for three of the six study intersections: 1) State Route 99 and 212th Street SW, 2) State Route 99 and 220th St SW, and 3) State Route 99 and 224th St SW.</p>

ELEMENT OF THE ENVIRONMENT	IMPACTS COMMON TO BOTH ALTERNATIVES	IMPACTS OF ALTERNATIVE 1 NO ACTION	IMPACTS OF ALTERNATIVE 2 PREFERRED ALTERNATIVE
Public Services			
Police	<p>Incremental increases in demand for police services are anticipated with the population growth, increased building heights, and increased construction activity proposed under both alternatives. The Department would address future service needs through ongoing capital improvement, planning and budgeting efforts.</p> <p>Future development under both alternatives could potentially have a positive impact on crime, by reducing the number of vacant or underutilized parcels and by increasing the number of people in public places.</p>	In order to maintain the current level of service identified in the Edmonds Police Department's 2016-2021 <i>Multiyear Strategic Plan</i> , approximately 5.0 police officers and 1.5-2 police staff assistants would need to be added incrementally by 2035 as the population increases.	In order to maintain the current level of service identified in the Edmonds Police Department's 2016-2021 <i>Multiyear Strategic Plan</i> , approximately 10.2 police officers and 1.5-2 police staff assistants would need to be added incrementally by 2035 as the population increases.
Fire and Emergency Medical Services (EMS)	<p>Under both of the alternatives, increased growth and development is anticipated to generate incremental new demands for fire and EMS services within the study area, and place additional pressure on Fire District 1 to meet response time standards as growth occurs over time. The District would attempt to maintain response times consistent with or better than current performance levels as the demand for service increases.</p> <p>Fire District 1 would address future service needs through ongoing capital improvement, planning, and budgeting efforts. Additional staffing and equipment may be required incrementally over time in order to maintain performance levels.</p>	No impacts other than those described under Impacts Common to All Alternatives.	No impacts other than those described under Impacts Common to All Alternatives.
Schools	Growth in the study area would likely result in incremental increases in the public school student population and associated incremental impacts on public schools. This	No impacts other than those described under Impacts Common to All Alternatives.	Alternative 2 is expected to result in an increase of about 645 students more than the No Action Alternative, spread across all grades.

ELEMENT OF THE ENVIRONMENT	IMPACTS COMMON TO BOTH ALTERNATIVES	IMPACTS OF ALTERNATIVE 1 NO ACTION	IMPACTS OF ALTERNATIVE 2 PREFERRED ALTERNATIVE
	<p>would allow the District to respond through ongoing capacity management planning.</p> <p>The District's projected 2036 capacity is sufficient to accommodate the expected increase in school aged children under both alternatives.</p>		<p>No impacts other than those described under Impacts Common to All Alternatives.</p>
<p>Parks and Open Space</p>	<p>Growth in residential and worker populations in the study area proposed under both alternatives is expected to result in increased use of existing parks and open space facilities in the study area, and corresponding increases in operations and maintenance needs.</p> <p>Expected growth and development in the study area under both alternatives would further exacerbate existing gaps in geographic access to park and recreation facilities.</p> <p>Total system LOS, however, under both alternatives would be above the City's adopted standard of 11.45 acres per 1,000 residents if no new acreage were added.</p>	<p>No impacts other than those described under Impacts Common to All Alternatives.</p>	<p>Alternative 2 includes improvements to pedestrian and bicycle character, access, and mobility within the study area, particularly crossing Highway 99. As such, east-west access across Highway 99 to park and recreation facilities would likely improve.</p>
<p>Utilities</p>			
<p>Electricity</p>	<p>Under both alternatives, the existing Snohomish County PUD No. 1 system may need improvements or reconfiguration to meet future growth needs throughout the study area. Potential upgrades could range in scope from local service improvement up to and including new substation and transmission facilities.</p> <p>PUD would continue its practice of upgrading the electrical system, commensurate with</p>	<p>No impacts other than those described under Impacts Common to All Alternatives.</p>	<p>No impacts other than those described under Impacts Common to All Alternatives.</p>

ELEMENT OF THE ENVIRONMENT	IMPACTS COMMON TO BOTH ALTERNATIVES	IMPACTS OF ALTERNATIVE 1 NO ACTION	IMPACTS OF ALTERNATIVE 2 PREFERRED ALTERNATIVE
	<p>anticipated growth in the study area and throughout their service area, in order to ensure adequate electrical services are provided. New customers would be served as the development occurs, on a case-by-case basis. A feasibility study may be required depending on the level of development and associated new loads.</p> <p>In addition, the City and PUD would continue to pursue energy efficiency measures to reduce energy consumption, thereby reducing stress on the utility as residential and jobs growth occurs.</p>		
Stormwater	<p>Under both alternatives, stormwater volumes would likely be managed in the same manner as they are today. The study area is mostly built out so development under both alternatives would likely not increase the amount of impervious surface area.</p> <p>Regulations governing stormwater requirements for development have also become significantly more comprehensive since much of the study area was developed; any redevelopment or new development under either alternative would be subject to these stricter regulations and may thus improve the hydrologic characteristics and water quality of the study area.</p>	No impacts other than those described under Impacts Common to All Alternatives.	<p>Under Alternative 2, the amount of stormwater runoff is expected to decrease more than the No Action Alternative. Redevelopment at higher densities – with a focus on residential development and pedestrian amenities – would result in a reduction of impervious surfaces if new landscaping and open space areas are incorporated into the redevelopment projects, as required by the City code and stormwater regulations. Planned streetscape improvements under Alternative 2 would also increase landscaping along the street – trees and other landscaping provide a natural ability to absorb stormwater and release it slowly to the atmosphere, resulting in positive impacts to stormwater practices in the study area.</p> <p>In addition, Alternative 2 provides greater incentive for mixed-use and commercial development in proximity to existing infrastructure on SR-99, making more efficient use of available stormwater capacity.</p>

Source: Edmonds 2016; 3 Square Blocks 2017; DKS 2017.

MITIGATION MEASURES

This EIS contains three types of mitigation measures: 1) incorporated plan features, 2) regulations and commitments, and 3) other mitigation measures. Incorporated plan features are mitigation measures contained in plans and policies that are adopted or planned for adoption as part of the proposed action. Regulations and commitments are mitigation measures contained in regulations or other requirements that are adopted or planned for adoption as part of the proposed action. Other mitigation measures include any mitigation measures not included in the other two categories.

LAND USE

Incorporated Plan Features

- Under Alternative 2, the proposed Subarea Plan includes policy language in support of the proposed stepback development regulations discussed below, which are intended to help mitigate for potential land use conflicts around the edges of the subarea.

Regulations and Commitments

- Under both alternatives, zoning designations would provide sufficient capacity to accommodate the City's growth targets for the subarea.
- Under both alternatives, existing development and design standards require site design to be compatible with existing and planned character of the nearby area. Applicable site development standards include those for setbacks, screening and buffering, site design, lighting, building design and massing, and others.
- Under Alternative 2, the proposed new stepback standards would mitigate for land use incompatibilities in areas where the updated CG zone abuts single family zones, when combined with the City's remaining existing development and design standards.
- Under Alternative 1, existing zoning helps to create transitions between single family zoned areas and areas of the study area zoned for the highest intensity uses. Transitional zoning includes multifamily, community business, neighborhood business, and medical use zones along the edges of the study area.

Other Mitigation Measures

- None

PLANS AND POLICIES

Incorporated Plan Features

- Under both alternatives, the locally-designated role of the Highway 99 Corridor would continue to be maintained and reinforced through the plan vision for a high density, walkable mixed-use neighborhood with urban amenities.

- For Alternative 2, amendments to the Comprehensive Plan and text are recommended to clearly identify the three distinct districts anchored around major transportation gateways and employment clusters, such as the hospital and international businesses (*Recommendation 3.1, February 2017 Draft Highway 99 Subarea Plan*). These amendments would bring the Comprehensive Plan and recommended Highway 99 Subarea Plan into alignment.

Regulations and Commitments

- As required by GMA, the draft Subarea Plan and regulations will be submitted to the Washington Department of Commerce for review and comment prior to final adoption.

Other Mitigation Measures

- None

AESTHETICS

Incorporated Plan Features

- Under Alternative 2, the proposed Subarea Plan contains policy guidance and recommended transportation improvement projects that are intended to enhance the aesthetics and urban design of the study area and support the community’s vision for the future neighborhood character of the corridor. The policy guidance calls for improvements in signage and wayfinding, using design to strengthen business opportunity, development of a unique district design identity, supporting building types and uses typical of vibrant urban corridors, and making code updates to support more pedestrian- and transit-friendly building forms and streetscapes.
- Under both alternatives, the Comprehensive Plan provides policy guidance for development that occurs within the Highway 99 Corridor and Medical/Highway 99 Activity Center Comprehensive Plan Map designations. The majority of the study area falls within these designations. Applicable goals and policies call for making the area more attractive and pedestrian friendly, ensuring that the design of new development contributes to the quality and character of the area, encouraging a variety of building types, using landscaping and buffering to soften street fronts and to provide transitions between more and less intensive uses, and fostering distinct sub-district identities consistent with the Highway 99 Corridor Vision.

Regulations and Commitments

- Transitions in building height and bulk between portions of the subarea zoned for the highest intensity uses and adjacent single family zoned areas and would be provided under Alternative 2 by the proposed new upper story stepback standards and by the City’s remaining existing development standards for the study area. Under Alternative 1, these types of transitions would be provided by existing zones along the edges of the study area including multifamily, community business, neighborhood business, and medical use zones.
- Under both alternatives, existing development and design standards require site design to be compatible with existing and planned character of the nearby area. Applicable site development

standards include those for setbacks, screening and buffering, site design, lighting, building design and massing, and others.

Other Mitigation Measures

- None

TRANSPORTATION

Incorporated Plan Features

- The City of Edmond's existing planned transportation improvements will help to mitigate for traffic impacts under both alternatives.
- The near-term and long-term transportation improvements in the proposed Subarea Plan will contribute to the underlying infrastructure that creates transit, pedestrian, and bicycle-friendly places and will indirectly help to mitigate for traffic impacts under the Preferred Alternative.

Regulations and Commitments

- Continue to implement the planned transportation improvements identified in the City of Edmonds Comprehensive Transportation Plan and subsequent updates using the six year Transportation Improvement Program as the instrument for prioritizing projects and identifying funding.
- Incorporate the near-term and long-term transportation improvements identified in the proposed Subarea Plan into the Comprehensive Transportation Plan's capital improvement projects and utilize the City's current the six year Transportation Improvement Program to prioritize projects and identifying funding.
- Use the current Comprehensive Transportation Plan process (updating the Plan in a cycle approximately every six years) as the mechanism for monitoring the LOS at impacted intersections.
- Build flexibility into each cycle of the six year Transportation Improvement Program to modify the priority and funding of the capital projects serving the study area as new development occurs and creates opportunities for matching funds from private development; redirecting project priorities and timing to coincide with major developments.
- Continue competing for funding from state and federal grants and continue to watch for potential new funding sources.
- Leverage the proposed Subarea Plan and Planned Action Ordinance to request early distribution of state funds (\$10,000,000) earmarked for Highway 99 within Edmonds in the State's Ten Year Transportation Investment Plan.

Other Mitigation Measures

Traffic

- Stage 1: Implement Transportation Demand Management (TDM) mitigation measures to potentially reduce intersection level of service impacts under the No Action and Preferred Alternatives.
 - Within 6-months of occupation of new developments, require tenants or managing organizations such as Homeowners Associations or property managers to implement TDM programs.
 - Residential (any size), commercial (under 25 employees), and mixed-use developments can select from a menu of TDM measures specifically assembled for these types of land uses. The City will develop guidelines and worksheets for tenants of new developments to formulate a trip reduction plan. Plan must be submitted to the Planning Department for approval.
 - Developments comprised of larger employers are required to develop and implement TDM plans tailored to their workforce. Employers with 25 to 100 employees are required to develop a TDM plan selecting from the menu of TDM measures described above, or customize their own plan. TDM plans for employers with 100 employees or more must conform to the requirements of the Commute Trip Reduction (CTR) law that is part of the Washington Clean Air Act (RCW 70.94).
 - Menus of TDM strategies should include tiers of measures that have varying levels of effectiveness and cost including measures within the following broad categories and associated example measures:
 - Financial incentives, amenities and perks:
 - Fully or partially subsidized transit passes
 - Carpool/vanpool subsidies such as fuel vouchers, provision of vehicles, full or partial coverage of vehicle lease, fuel, insurance and maintenance
 - Car share membership for use by registered carpool and transit commuters
 - Emergency ride home program
 - Company vehicle available for employees who commute by alternative modes
 - Prize drawings to employees or residents who commute by alternative modes
 - Subsidized off-site services such as fitness center, daycare, dry cleaning, bicycle repair and maintenance, etc.
 - Service provided, or delivered, on-site such as dry cleaning pickup and delivery, ATM machine, fitness center, daycare, etc.

- Parking Management Strategies
 - Charge market rate for employee parking
 - Parking cashout program
 - Preferential parking for carpool/vanpools
 - Restrictions or limited on-site parking
 - Unbundled parking
 - On-site bike share and/or car share facilities
 - Support Strategies and Assistance
 - Part or full-time on-site TDM coordinator
 - Commute options package for new employees and/or residents
 - Commute alternative information kiosk or website
 - Rideshare matching program
 - Discounts on purchasing bicycles and accessories
 - Sponsored events promoting alternative commute options
 - Promote and encourage formation of a local Transportation Management Association (TMA) to manage programs, provide services, and assist members in developing, monitoring and refining TDM plans. TMA may initially be run by TDM coordinators and eventually evolve into a professionally managed organization that extends beyond the subarea.
 - Except where required by law or as a condition of approval, monitoring, refinement, and maintenance of individual TDM plans by new development is voluntary after the initial submittal for plan approval.
- Stage 2: Implement new capacity-enhancing mitigation measures for intersection impacts under the Preferred Alternative.
 - Incorporate the following new intersection capacity-enhancing mitigation measures into the City's standardized six-year Transportation Improvement Program process for funding and prioritizing transportation projects:
 - State Route 99 / 220th Street SW – Widen State Route 99 to add a second northbound left turn lane. This intersection is projected to operate at LOS F under buildout of the Preferred Alternative, exceeding the standard of LOS E even with implementation of the improvement called for in the 2015 Comprehensive Transportation Plan to widen 220th to add a westbound right turn lane and a second westbound left turn lane, and an eastbound right turn lane.
 - State Route 99 / 224th Street SW – Convert the eastbound approach of 224th Street SW to provide an exclusive right turn lane, a shared through/right turn lane, and an exclusive left turn lane. This intersection would operate at a LOS F under buildout of the Preferred Alternative. This intersection was not studied in

the 2015 update to the Comprehensive Transportation Plan and, therefore, does not currently have any planned improvements.

- Take steps to enable the new capacity-enhancing mitigation measures when and if monitoring shows that the measures are required, and implement the improvements, as the following opportunities arise:
 - Require any new development, redevelopment or site improvements requiring a building permit on the properties adjacent to the impacted intersections to not construct any form of structure or infrastructure (except landscaping or other streetscape improvements) on, under, or above the right of way potentially needed to be acquired for the intersection capacity improvements.
 - Coordinate with WSDOT and adjacent municipalities on the potential land acquisitions needed for the intersection capacity improvements located within their jurisdictions and, if possible, request the adjacent municipalities to apply the same building restrictions.
 - As funds become available through the City's Transportation Improvement Program process, construct the capacity improvements. This may include acquiring the necessary right of way from adjacent property owners through purchase or negotiated dedication.

PUBLIC SERVICES

Incorporated Plan Features

- Proposed transportation projects under the sub-area plan would improve pedestrian and bicycle character, access, and mobility within the study area, particularly crossing Highway 99. As such, east-west access across Highway 99 to park and recreation facilities would improve.
- The sub-area plan would provide greater incentive for mixed-use and commercial development in proximity to existing infrastructure on SR-99, making more efficient use of available stormwater capacity.
- Planned streetscape improvements under Alternative 2 would increase landscaping along the street – trees and other landscaping provide a natural ability to absorb stormwater and release it slowly to the atmosphere.
- Continue to pursue energy efficiency measures to reduce energy consumption, thereby reducing stress on Snohomish County PUD as residential and jobs growth occurs. The sub-area plan encourages sustainable building practices, including considering requiring electric vehicle charging facilities and encouraging solar panels (*Recommendation 2.2 and 2.3, February 2017 Draft Highway 99 Subarea Plan*).

Regulations and Commitments

Police

- Implement the 2016 agency goals in the Department's 2016-2021 *Multiyear Strategic Plan*. These goals include bringing the Street Crimes Unit and second K-9 team back on line;

partnering with City Council and the Edmonds School District to secure funding for a School Resource Officer for Edmonds-Woodway High School; establishing by policy the Peer Support Team to assist Department members and their families in time of need; and working with SNOCOM and Bair Analytics to secure a crime analysis workstation which interfaces with records management and helps bring a public crime mapping portal on-line.

- As recommended in the 2016-2021 *Multiyear Strategic Plan*, maintain, at a minimum, the current staffing ratio of 1.35 commissioned officers per 1,000 residents. Continue looking to future budget cycles and preparing to pursue and justify the addition of commissioned staff as the economic climate allows.
- As recommended in the 2016-2021 *Multiyear Strategic Plan*, restore the Crime Prevention Officer position to aid the Department's ability to conduct crime prevention training and strategies for businesses, apartment management, various concerned groups, and individuals.

Fire and Emergency Medical Services (EMS)

- Ongoing capital facilities improvement, budgeting, and operational planning by Fire District 1 and the City of Edmonds are anticipated to address incremental increases and other changes in demand for fire services, including the need for additional personnel, additional apparatus, and facility improvements. Fire District 1 recently completed the first Phase of a Capital Facilities Plan which evaluates existing conditions, including an inventory and assessment of existing facilities. Phase 1 of the plan indicated a need for minor near and mid-term maintenance and repairs at Stations 16 and 17, as well as potential seismic or safety upgrades. Station 20 is identified as one of 5-6 stations throughout the district which should be considered for replacement to support operation needs and code deficiencies (Fire District 2016c, 46, 48, C114-C145). Phase 2 will forecast future needs and phase 3 will provide an estimate of capital facility funding necessary to execute the plan, an implementation timeline and a recommended funding approach.
- All potential development in the study area would be constructed in compliance with the City's current Fire Code (ECDC 19.25), which is comprised of the 2015 International Fire Code with Edmonds Amendments. Adequate fire flow to serve potential development would be provided as required by the Fire Code. Potential development would also be required to comply with code requirements for emergency access to structures. The Department of Fire Prevention also reviews proposed street improvements on a project-by-project basis to identify potential negative impacts on response times and ensure street improvements are consistent with the City's Fire Code.
- A portion of the tax revenue generated from potential redevelopment in the study area would accrue to the City and Fire District 1 to help fund additional fire and emergency medical services.

Schools

- Ongoing capital facilities improvements, budgeting, and operational planning by the District and City of Edmonds are anticipated to accommodate projected student enrollment at acceptable levels of service over the next twenty years.

- Continue to replace, expand, modernize, and upgrade District facilities as approved by voters in the 2014 Capital Construction Bond.
- Implement the goals identified in Edmonds School District’s Strategic Direction (ESD 2014).

Parks and Open Space

- Implement goals identified in the 2014 *Parks, Recreation, and Open Space Plan* which improve the park system within or near the study area to address geographic gaps in service (Edmonds 2014, 4-1 – 4-11). Specifically:
 - Expand the partnership with the Edmonds School District, including negotiating an agreement for expanded, year-round public use of school grounds, sports fields and gyms for recreation purposes (Goal 1.A).
 - Explore property acquisition and development with partners, including the School District, Snohomish County and other public and private entities – continue to partner with neighboring and overlapping jurisdictions (cities, counties, school districts) as well as private entities (i.e. churches) to expand recreation opportunities for the community; continue discussions for possible acquisition of Esperance Park from Snohomish County for annexation and redevelopment into a community park with sports fields, community gardens, picnic shelters, and other recreation features; and consider acquisition of County park land within or adjacent to Edmonds (if made available), such as Chase Lake (Goal 2.C).
 - Acquire park land in the Highway 99/SR 104 areas to provide adequate park service in redeveloping areas. Create new civic spaces to enhance investment and revitalization while meeting recreation needs, especially where service gaps exist, or higher residential impact is planned (Goal 2.G).
 - Define the best routes for and treatments to create central north-south and east-west pedestrian and bicycle corridors, incorporate these into the City’s transportation plans, and implement improvements (Goal 2.N).
 - Increase connections to the Interurban Trail, using signage, sidewalks, curb extensions, and other pedestrian/bicycle enhancements, especially focusing on crossing Highway 99 (Goal 2.O).
- Strongly consider the formation of a Metropolitan Park District in order to sustain the level of quality expected by the community while growing to meet future needs (Edmonds 2014, 5-5).

Electricity

- Ongoing capital facilities improvements, budgeting, and operational planning by Snohomish County PUD are anticipated to address incremental increases and other changes in demand for electricity. Depending on the level of development and associated new loads, conduct feasibility studies for individual projects as part of the development review process. Develop system capital projects to meet the demands of future loading if capacity improvements are necessary (Ha pers. comm.).

Stormwater

- Any redevelopment or new development under both alternatives would be subject to today's stricter regulations governing stormwater. The City's *Storm and Surface Water Management Comprehensive Plan* (2010) will guide infrastructure improvements. Specific elements of the stormwater improvements will be defined by the requirements of the State-mandated *NPDES Western Washington Phase II Municipal Stormwater Permit*. Under this set of regulations, the City maintains measures to protect and improve runoff conditions in relation to the receiving waters. The City of Edmond's stormwater management requirements and ongoing efforts are included in:
 - Edmonds Community Development Code 18.30 and Stormwater Code Supplement to 18.30 (Edmonds 2010b; Edmonds 2016c) – the City is nearly finished updating the Stormwater Code and Supplement, anticipated to be adopted January 1, 2017 (Cawrse pers. comm.)
 - Storm and Surface Water Management Comprehensive Plan (Edmonds 2010a)
 - Stormwater Management Program Plan (Edmonds 2016f)
- The types of Best Management Practices (BMPs) are source control, treatment, and flow control. Source control BMPs typically prevent pollution, or other adverse effects of stormwater, from occurring – examples include methods as various as mulches and covers on disturbed soil, putting roofs over outside storage areas, and berming areas to prevent stormwater run-on and pollutant runoff. Treatment BMPs can accomplish significant levels of pollutant load reductions if properly designed and maintained – examples include facilities that remove pollutants by simple gravity settling of particulate pollutants, centrifugal separation, filtration, biological uptake, and media or soil adsorption. Flow control BMPs typically control the volume rate, frequency, and flow duration of stormwater surface runoff – examples include construction of a detention pond (the most common means of meeting flow control requirements) or an infiltration facility. Green design and construction methods should be employed in buildings, streetscapes, and drainage features to detain and treat stormwater (Ecology 2014, 8-10).

Other Mitigation Measures

Police

- Monitor growth and demand for police services in the study area in order to determine if/when additional personnel are needed. Regularly review trends to ensure the Police Department has enough advance time to address the needs.
- Require or encourage Crime Prevention through Environmental Design (CPTED) techniques – implement incorporation of design features into development that would help reduce criminal activity and calls for service, including orienting buildings toward the sidewalk and public spaces, providing connections between buildings, and providing adequate lighting and visibility.

Fire and Emergency Medical Services (EMS)

- Monitor growth and demand for fire and emergency medical services in the study area in order to determine if/when additional personnel, equipment, or facilities are needed. Regularly

review trends to ensure the City and Fire District 1 have enough advance time to address the needs.

- The City and Fire District 1 should work together to plan for pedestrian improvements, such as wider sidewalks, to ensure that the opportunity for emergency vehicle maneuvering is maintained.
- Continue efforts to find sufficient resources to retain and improve Fire District 1's current level of services provided. Efforts include exploring additional funding sources – such as a Fire Benefit Charge or Levy Lid Lift; pursuing ways to reduce unnecessary costs/eliminate redundancy, including potential opportunities to partner with neighboring cities, Fire District 7, and other Fire Protection agencies through regional consolidation; and planning for the possible formation of a Regional Fire Authority in South Snohomish County.

Schools

- Monitor growth in enrollment and demand for educational program offerings across all grade spans in the study area in order to determine if/when additional personnel or facilities are needed. Regularly review trends to ensure the City and Edmonds School District Number have enough advance time to address the needs, including grade configuration, optimum facility size, educational program offerings, classroom utilization, scheduling requirements, and the use of temporary classroom facilities.
- Continue to evaluate both condition and capacity of existing facilities at Westgate and Sherwood Elementary Schools to determine if a bond should be issued.

Parks and Open Space

- Provide on-site open space as a residential amenity through new development.
- Develop, manage, and program public open spaces through public/private partnerships.
- Implement pedestrian and bicycle transportation improvements to provide greater access to existing facilities within one-half mile of the study area, with a focus on removing Highway 99 as a physical barrier.
- Existing recreational programs may see increased enrollment and increased revenue as people living in the study area enroll in more programs. This increased enrollment may marginally help offset the costs of providing additional facilities.

Electricity

- Evaluate and identify future service system needs through coordinated electricity demand planning between the City Planning Department and Snohomish County PUD.
- PUD is currently undergoing smart grid infrastructure modernization of its electrical distribution system to improve reliability and increase efficiencies for its customers.
- Reduce the use of power in building heating and cooling with passive systems and modern power saving units.

Stormwater

- None.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

LAND USE

No significant unavoidable adverse land use impacts are anticipated under either alternative.

PLANS AND POLICIES

No significant unavoidable adverse impacts are anticipated with respect to future subarea plan consistency under either alternative.

AESTHETICS

No significant unavoidable adverse to aesthetics and urban design are expected under either alternative.

TRANSPORTATION

The traffic impact to the intersection of State Route 99 and 212th Street SW is considered a significant unavoidable adverse impact under both alternatives. This intersection is projected to fall below the City's established level of service standard under both the No Action Alternative and the Preferred Alternative, even with implementation of the planned improvements for this intersection called for in the 2015 update of the Comprehensive Transportation Plan, which include widening 212th to add a westbound and eastbound left turn lane and providing protected left turn phasing for the eastbound and westbound movements.

To mitigate the impacts of both the No Action Alternative and the Preferred Alternative on this intersection would require widening State Route 99 to add a second northbound and southbound left turn lane, in addition to the improvements already planned in the Comprehensive Transportation Plan. This is not feasible because a proposed development project located on the southwest corner of the intersection is in the process of finalizing its site plan with the City, and the site plan places infrastructure within the right of way that would need to be acquired to implement the mitigation measure. It is anticipated the proposed development will remain in place for the duration of the 20-year Subarea Plan timeframe.

PUBLIC SERVICES AND UTILITIES

There are no significant unavoidable adverse impacts related to police, fire and emergency medical services, parks and open space, electricity, or stormwater. Although demand for these services would increase, the application of existing plans and codes or other mitigation measures can reduce impacts associated with future growth under both alternatives.

CHAPTER 2 DESCRIPTION OF THE PROPOSAL AND ALTERNATIVES

2.1 INTRODUCTION

OVERVIEW OF THE PROPOSED ACTION

The proposal by the City of Edmonds consists of the following related actions:

1. Adoption of a Highway 99 Subarea Plan, consistent with the City's Comprehensive Plan and Washington State Growth Management Act (GMA).
2. Adoption of Comprehensive Plan amendments to reflect the updated map and text in the Highway 99 Subarea Plan.
3. Adoption of an area-wide rezone that would generally apply the CG zone to most of the study area.
4. Adoption of amendments to development standards to implement the Subarea Plan, including:
 - a. Maximum building height in CG zone
 - b. Transit supportive parking standards
 - c. Minimum building frontage and transparency requirements along the primary street frontage
 - d. Parking area location
 - e. Pedestrian Activity Zone designation along all street frontages
 - f. Upper story stepbacks adjacent to single family zones
5. Adoption of an ordinance designating the Highway 99 Subarea as a Planned Acton for the purposes of SEPA compliance pursuant to RCW 43.21.031(2)(a) and WAC 197-11-164.

The Highway 99 Subarea Plan envisions a lively mixed use corridor along SR 99 that will include more housing, employment opportunities, pedestrian, transit and bicycle mobility, and community gathering places. The purpose of this Draft Environmental Impact Statement (EIS) is to provide a more detailed environmental analysis during this planning stage, rather than at the project permit review stage. This Draft EIS identifies specific environmental impacts and ways to mitigate impacts in advance of

development. Advanced review will facilitate development consistent with the vision of the Highway 99 Subarea Plan by streamlining future environmental review and permitting.

PROPONENT

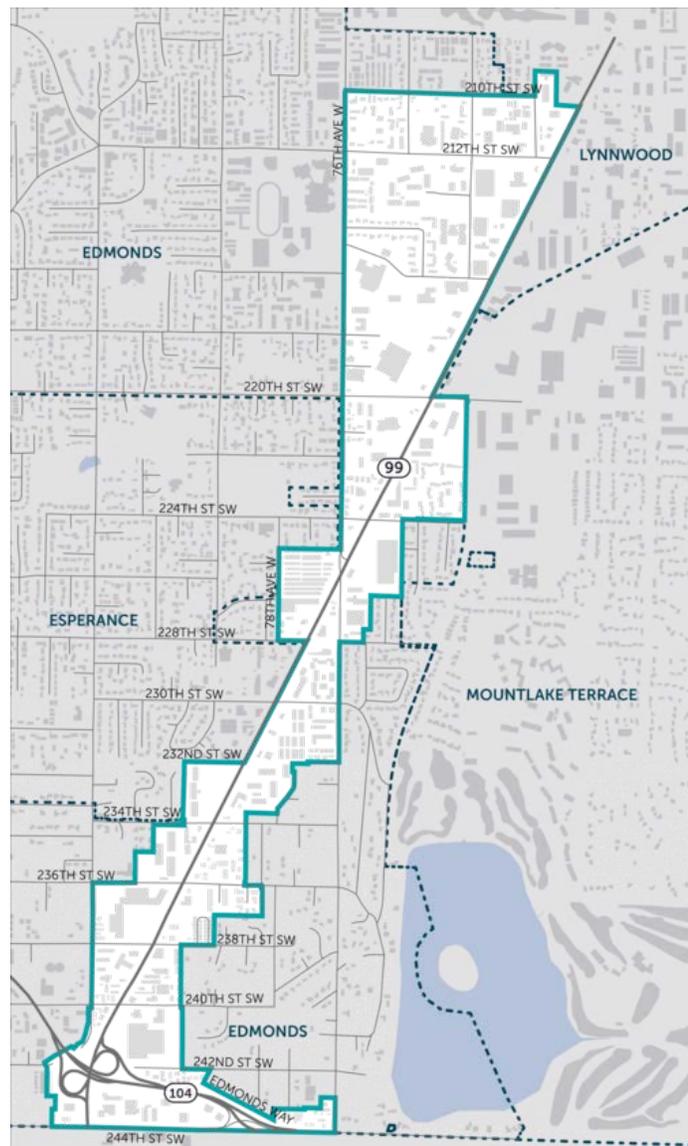
The Highway 99 Subarea Plan is proposed by the City of Edmonds. The City is the lead agency for this Draft EIS.

PROJECT LOCATION

The Highway 99 Corridor study area extends approximately two miles along the alignment of SR 99, bounded by the King/Snohomish County boundary on the south and 210th Street SW on the north (see Figure 2.1). To the east and west of SR 99, the study area follows an irregular boundary established by existing development patterns in the City of Edmonds and the boundaries of the adjoining cities of Lynnwood, Mountlake Terrace and Snohomish County. The study area comprises approximately 335 acres in total.

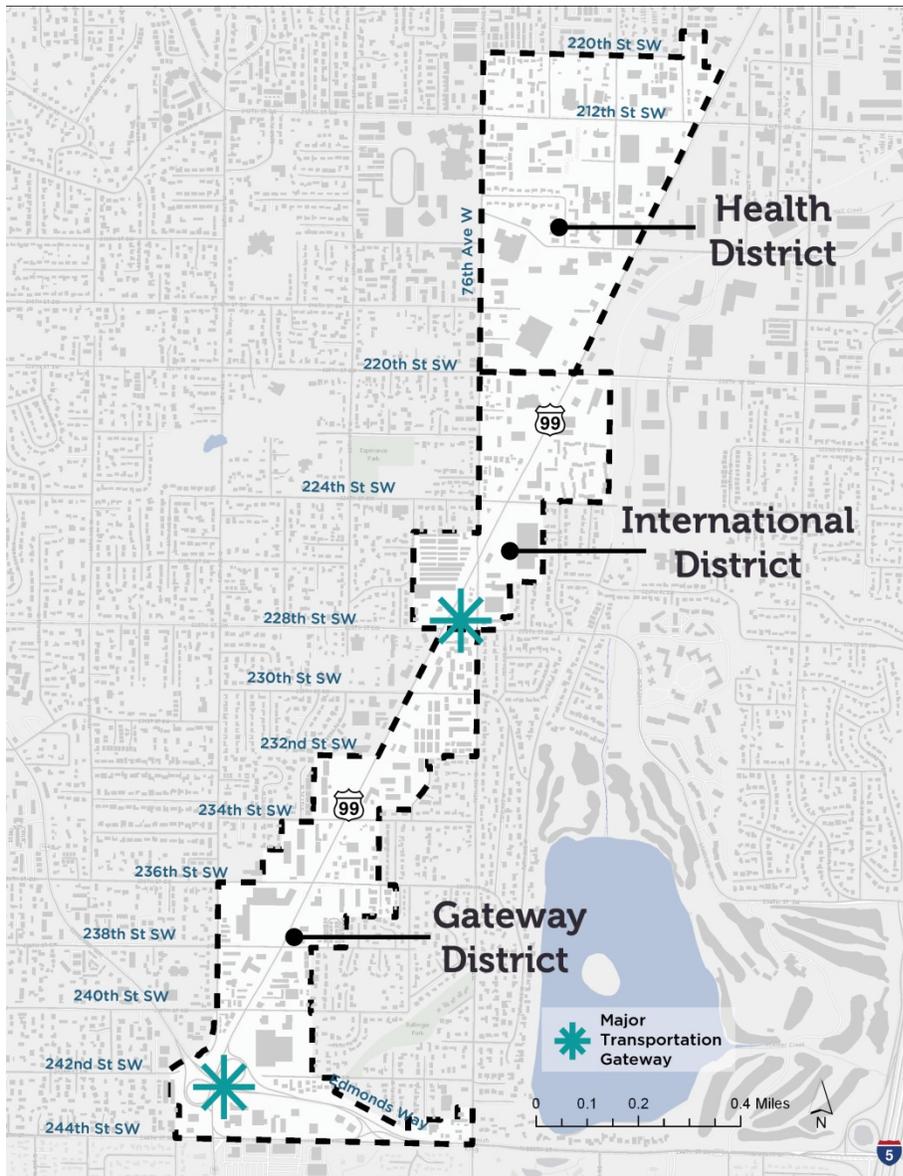
Within the subarea, three distinct districts have been identified (see Figure 2.2). To the south, the Gateway District is a major entrance to Edmonds from the south and east and provides for relatively large scale commercial or mixed use development. In the central portion of the study area, the International District provides a wide array of restaurant, retail services and other supporting development that meet the needs of diverse cultures. To the north, the Health District includes the Swedish Medical Center/Edmonds and related medical services and offices.

FIGURE 2.1 Highway 99 Corridor Study Area



Source: Edmonds 2016; Fregonese 2016.

FIGURE 2.2 Districts within the Highway 99 Corridor Study Area



Source: Edmonds 2016; Fregonese 2016.

OBJECTIVES OF THE PROPOSAL

The City has identified the following specific objectives of the proposal:

- Establish a clear long-term vision for the Highway 99 corridor that helps guide future public investment decisions, including investments for multimodal improvements to the corridor.
- Encourage a mixture of land uses throughout the Highway 99 corridor, including residential, office, retail, and civic projects.
- Create housing choices attractive to people from all walks of life.
- Create an attractive pedestrian-oriented streetscape environment.

- Provide opportunities for medical services growth in the area surrounding Swedish Medical Center/Edmonds.
- Provide for enhanced mobility for all modes of travel along the Highway 99 corridor.
- Provide a streamlined SEPA review process for future site-specific development proposals.
- Provide an incentive for development proposals that are consistent with the overall intent of the Highway 99 corridor vision.
- Provide greater certainty to potential developers, city decision-makers, and the general public regarding the future development pattern and likely impacts of future development in the SR 99 corridor.

The alternatives considered in this Draft EIS include No Action (Alternative 1) and the Preferred Alternative (Alternative 2). Under Alternative 1, future growth would continue based on existing development regulations and past development trends. Alternative 2 assumes future mixed use growth and assumes a new vision for the area supported by transportation system improvements, an area-wide rezone and amendments to existing development regulations.

2.2 PLANNING CONTEXT

GROWTH MANAGEMENT ACT

The Growth Management Act (GMA), adopted by the 1990 Washington State Legislature and amended periodically thereafter, contains a comprehensive framework for managing growth and development within local jurisdictions. Many of the provisions of the GMA apply to the State's largest and fastest growing jurisdictions, including Snohomish County and all cities within the county. Additionally, some provisions, such as requirements to identify and regulate critical areas, apply to all local jurisdictions.

Comprehensive plans for cities planning under GMA must include a land use element (including a future land use map), housing element, transportation element, public facilities element, parks and recreation element, economic development element, and utilities element. Additional elements may be added at the option of the local jurisdiction. The GMA plan must provide for adequate capacity to accommodate the city's share of projected regional growth. The plan must also ensure that planned and financed infrastructure can support planned growth at a locally acceptable level of service.

As required by the GMA, the City has prepared and adopted a local Comprehensive Plan to guide future development and fulfill the City's responsibilities under GMA.

EDMONDS COMPREHENSIVE PLAN

The Edmonds Comprehensive Plan is a 20-year plan that provides guidance for how Edmonds will accommodate growth in a way that is consistent with the vision of the residents of the City. The City implements the plan through the City's Official Zoning Map, zoning regulations, design review processes and other programs and actions.

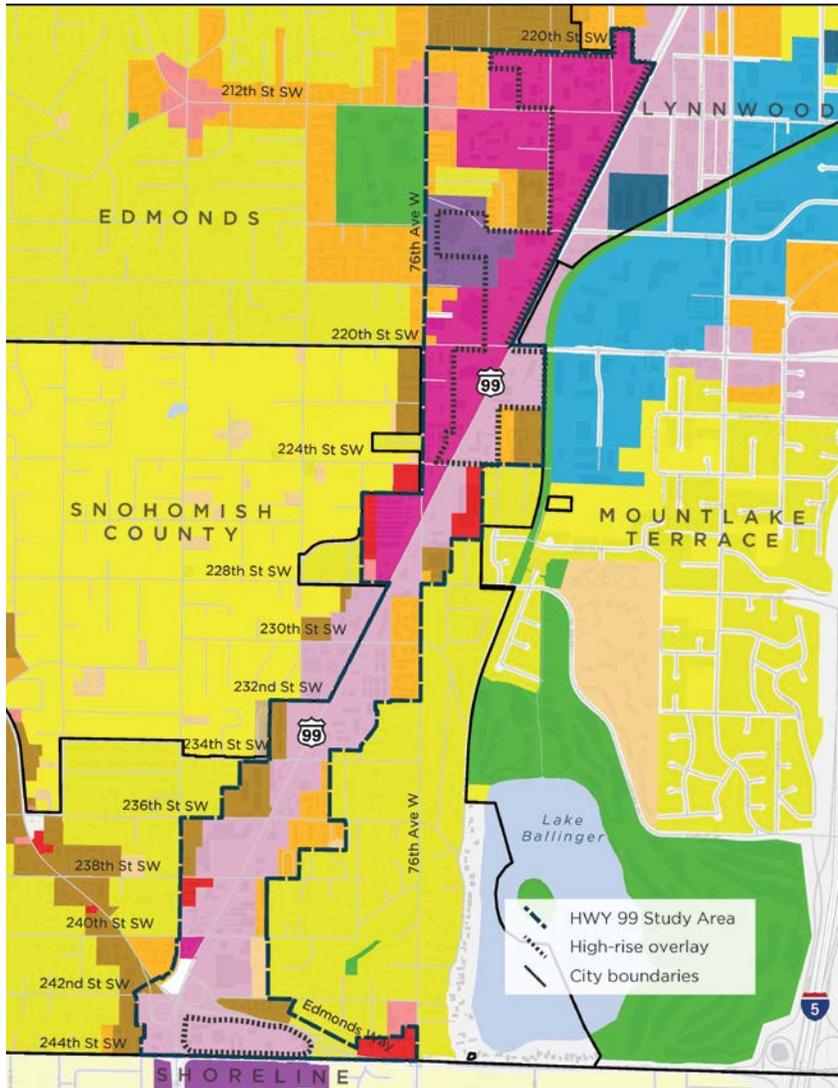
Consistent with the Washington Growth Management Act (GMA), the City adopted an updated Comprehensive Plan that incorporates updated estimates of employment and population growth through 2035. The Comprehensive Plan contains general community information and chapters that address sustainability, land use, housing, economic development, community culture and urban design, utilities, capital facilities, and transportation.

The Comprehensive Plan contains several references to the study area, including vision statements and goals and policies for a Highway 99 Corridor area that is slightly smaller in size than the study area, and a Medical/Highway 99 Activity Center in the vicinity of the Swedish Edmonds Campus. Comprehensive Plan design objectives applicable to the study area establish that it should support its function as a center for commercial and mixed use activity, building on the availability of multiple forms of transportation and proximity to surrounding residential neighborhoods. Adopted Comprehensive Plan guidance addressing the study area is more specifically discussed in Chapter 3.2 Plans and Policies.

EXISTING ZONING

There are eight zoning designations within the study area. As shown in Figure 2.3, the primary zoning designations in the study area are the GC and GC2 zones, which extend along the frontage of SR 99 through the entire study area. The remaining zoning designations are found on properties to the east and west of SR 99 and include zones for medical use (MU), focused on the Swedish Medical Center and adjacent properties, commercial uses (BN, BC), multifamily development (RM 1.5 and RM 2.4) and single family development (SR 8). Each of these zoning designations is briefly described in Table 2.1.

FIGURE 2.3 Study Area and Adjacent Areas Existing Zoning



EDMONDS ZONING	MOUNTLAKE TERRACE ZONING	SNOHOMISH COUNTY ZONING
 CG2 - General Commercial 2	 R-8,400 - Residential 8,400 sq ft	 R-8,400 - Residential 8,400 sq ft
 CG - General Commercial	 R-7,200 - Residential 7,200 sq ft	 R-7,200 - Residential 7,200 sq ft
 BN - Neighborhood Business	 RML - Multi Res Low Density	 MR - Multiple Residential
 BC - Community Business	 RMM - Multi Res Medium Density	 LDMR - Low Dens Multi Res
 RS-8 - Single Family, 8,000 sq. ft.	 CG - General Commercial	 GC - General Commercial
 RM-3 - Multi Family, 3,000 sq. ft.	 LI/OP - Light Industry/Office Park	 PCB - Planned Community Business
 RM-2.4 - Multi Family, 2,400 sq. ft.	 Recreation and Park District	
 RM-1.5 - Multi Family, 1,500 sq ft		
 MU - Medical Use	SHORELINE ZONING	
 P - Public Use	 MB - Mixed Business	
	 R-6 - Residential, 6 units/acre	
		LYNNWOOD ZONING
		 RS-8 - Residential 8,400 sq ft
		 RMM - Multi Res Medium Density
		 CG - General Commercial
		 BTP - Business/Technical Park

Source: Edmonds 2016; Fregonese 2016.

TABLE 2.1 Study Area Existing Zoning

ZONING DESIGNATION	SUMMARY
<p>CG, CG2 General Commercial</p>	<p>The CG and CG2 zones are both intended to encourage the development and retention of commercial uses that provide high economic benefit to the city. A development pattern that supports transit and pedestrian access in mixed use and transit-oriented developments is encouraged. The purpose statement for these zones address the SR 99 Corridor specifically, stating that development should:</p> <ul style="list-style-type: none"> • Provide the opportunity for different sections of the SR 99 Corridor to emphasize their unique characteristics and development opportunities • Upgrade architectural and landscape design quality • Provide for maximum economic use of suitable commercial land in high rise nodes through adequate services and facilities and including the following design features: <ul style="list-style-type: none"> – Use of distinctive forms and materials, differentiated facades, attractive landscaping and similar techniques – Design to take advantage of automobile, transit and pedestrian access – Adequate buffering from lower intensity uses and residential neighborhoods <p>Both the CG and CG2 zones allow for a wide range of commercial and residential uses and differ only in the standards for building height. Maximum permitted height in the GC zone is 60 feet and for the GC2 zone is 75 feet. At the north and south ends of the study area, areas designated as a high rise node by the Comprehensive Plan Land Use Map do not have a maximum height limit. (See Figure 2.4)</p>
<p>BN Neighborhood Business</p>	<p>The BN zone is intended to provide for retail and office services that offer goods and services needed on an everyday basis by residents or a neighborhood area and to ensure compact, convenient development patterns by allowing uses that are operated chiefly within buildings. Neighborhood scale businesses, certain community facilities and single family dwellings are permitted in this zone.</p>
<p>BC Community Business</p>	<p>The BC zone is intended to provide for retail, office, service and amusement establishments that offer goods and services to the entire community; to ensure compact, convenient development patterns by allowing uses that are operated chiefly within buildings; and to allow for mixed-use development which includes multiple dwelling units that are compatible with business uses. A range of commercial, residential and commercial uses are permitted in this zone.</p>
<p>MU Medical Use</p>	<p>The MU zone is intended to provide for hospitals and related medical facilities; enable master planning for medical campuses; allow for the concentration of medical facilities in order to enable the efficient provision of a wide spectrum of medical services. Uses permitted this zone are intended to be functionally related or serve medical or health care services.</p>
<p>RM 1.5, 2.4, and 3 Multiple Residential</p>	<p>The purpose of the multiple residential zones are to provide for a variety of housing types and a range of greater densities than are available in the single family residential zones and to provide for those additional uses which complement and are compatible with multiple residential uses.</p> <p>The RM-1.5 zone allows one dwelling unit per 1,500 sf of lot area, the RM-2.4 zone one dwelling unit per 2,400 sf of lot area, and the RM-3 one dwelling unit per 3,000 sf of lot area. Primary permitted uses include multiple and single family dwelling units; retirement, group and boarding homes and other uses permitted in the single family residential zones.</p>

ZONING DESIGNATION	SUMMARY
RS-8 Single Family Residential	<p>The single family residential zone is intended to provide for family living in single family dwellings and to provide for additional nonresidential uses which complement and are compatible with single family dwelling use.</p> <p>The RS-8 zone allows one dwelling unit per 8,000 sf of lot area. Primary permitted uses include single family dwelling units and schools, churches, local public facilities and parks, subject to specific conditions.</p>

Source: Edmonds 2016c, Title 16.

2.3 PUBLIC OUTREACH

The City's public engagement effort is intended to engage with the broad and diverse range of interested parties including area residents, businesses and property owners, community organizations, public entities and agencies, and potential developers or investors. The City is providing multiple ways in which stakeholders can participate, including online, social media, and public workshops and meetings. A brief summary of the City's public engagement activities to-date is provided in Table 2.2 Public Outreach Summary and additional information can be found at the City's project website: <http://www.edmondshwy99.org>.

TABLE 2.2 Public Outreach Summary

DATE	ACTIVITY
March 2016	Public workshop to brainstorm ideas for the vision and action plan for the SR 99 area. Topics included design and function of streets and buildings, land use, economic development and housing. Following a short presentation, the majority of the meeting focused on small group brainstorming in an interactive mapping exercise to record ideas, concerns and questions. For those who could not attend the meeting, an online survey provided additional opportunity for input.
May 2016	Public open house to review short and long-term scenarios for what Edmonds Highway 99 area could be like in the future, consider potential transportation and development impacts in the study area, and provide comments on the proposed environmental topics that are considered in the planned action EIS.
November 2016	Public open house to review draft policy recommendations, implementation strategies and actions for the Edmonds Highway 99 Subarea Plan. Draft recommendations address the following topics: zoning and development, affordable housing, signage and wayfinding, transit, and transportation infrastructure. Participants had the opportunity to review the recommendations in detail, ask questions and provide input to the project team.

Source: <http://www.edmondshwy99.org/past-events/>

2.4 ENVIRONMENTAL REVIEW

The purpose of this EIS is to assist the public and decision-makers in considering the potential environmental effects of the proposed subarea plan and implementing regulations.

ENVIRONMENTAL SCOPING

Scoping is the process of identifying the elements of the environment to be evaluated in an EIS. Scoping is intended to help identify and narrow the issues to those that are significant. Scoping includes a public comment period so that the public and other agencies can comment on key issues and concerns. Following the comment period, the City considers all comments received and determines the scope of review for the environmental analysis.

The City Edmonds issued a Determination of Significance (DS)/Scoping Notice for the SR 99 Corridor Plan on May 4, 2016 for the proposed action. Interested citizens, agencies, organizations and affected tribes were invited to submit comments on the scope of the Draft EIS, which closed on May 24, 2016. The City's DS and a summary of scoping comments are included in Appendix A.

The final scope of review for this EIS includes the following:

- **Land Use**, including an evaluation of the amount, type and pattern of uses. The focus of the analysis is on land use compatibility with existing and planned development within and adjacent to the analysis area. The land use analysis will also include an evaluation of consistency of the proposal with adopted plans and policies.
- **Aesthetics**, including an evaluation of the character of the existing corridor and the nature of change to the urban character that may result from the proposal. The analysis will consider the character of the corridor as whole as well as character at various locations along the corridor.
- **Transportation**, including consideration of impacts of the proposal and alternatives on trip generation, peak hour vehicular congestion, transit, bicycling and walking, park and safety. An analysis of consistency with Washington Department of Transportation standards for the Highway 99 Corridor, a state-designated highway, will also be evaluated.
- **Public Services/Utilities**, including a review of police, fire/emergency services, schools, parks and open space, electricity and stormwater. Existing levels of service, estimated needs and demand for services and measures needed, if any, to respond to projected demand from the proposal are described.

PLANNED ACTION

A Planned Action EIS provides more detailed environmental analysis during the early formulation stages of planning proposals rather than at the project permit review stage. Future development proposals consistent with an adopted planned action ordinance do not have to undergo an environmental threshold determination, and are not subject to SEPA appeals when consistent with the planned action

ordinance, including specified mitigation measures. Planned actions still need to meet the City's development regulations and to obtain necessary permits.

According to the SEPA law and rules, a planned action is defined as a project that has the following characteristics:

1. Is designated a planned action by ordinance or resolution adopted by a GMA county/city;
2. Has had significant environmental impacts addressed in an EIS, though some analysis can be deferred at the project level pursuant to certain criteria specified in the law;
3. Has been prepared in conjunction with a comprehensive plan, subarea plan, a fully contained community, a master planned resort, master planned development, a phased project, or in conjunction with subsequent / implementing projects;
4. Is located within an urban growth area;
5. Is not an essential public facility, as defined in RCW 12.36.70A.200, unless an essential public facility is accessory to or part of a residential, office, school, commercial, recreational, service, or industrial development that is designated a planned action; and
6. Is consistent with a comprehensive plan or subarea plan adopted under GMA.

In designating a planned action, the jurisdiction must define of the types of development included and has option to limit the boundaries and to establish a time period during which the planned action will be effective. Review of a planned action is intended to be simpler and more focused than for other projects. If a planned action ordinance is adopted, the City would follow the applicable procedures contained in the ordinance to determine if the proposed project impacts are consistent with the EIS. When a permit application and environmental checklist are submitted for a project that is being proposed as a planned action project, the City must first verify the following:

- The project meets the description of any project(s) designated as a planned action by ordinance or resolution.
- The probable significant adverse environmental impacts were adequately addressed in the EIS.
- The project includes any conditions or mitigation measures outlined in the ordinance or resolution.

If the project meets the above requirements, the project qualifies as a planned action project and a SEPA threshold determination is not required. However, the following City actions are still applicable:

- The project must continue through the City's permit process pursuant to any notices and other requirements contained in the City's development regulations.
- The project must still be analyzed for consistency with the City's Comprehensive Plan and development regulations.
- Designation of a planned action project does not limit the city from using other authority (e.g. conditional use permit) to place conditions on a project. The City may still use applicable laws or regulations to impose conditions on a project qualifying as a planned action project.

- Public notice for a planned action project is tied to the underlying permit. If notice is required for the underlying permit, then the notice will indicate that the project qualifies as a planned action.

The manner in which the City would monitor the development levels approved in the designated Planned Action area is likely as follows:

- Determine if the proposed land uses are within categories of land use authorized in the planned Action Ordinance, including residential, commercial, and office.
- Consider the Planned Action Ordinance to contain an authorized number of housing units, employment (commercial and office) space, and peak-hour traffic trips. As development is proposed the City would deduct approved development from these totals.
- Once the authorized number of development and/or peak hour trips is reached, the Planned Action Ordinance would expire and any new development would be required to follow the City's adopted SEPA process.

2.5 PROPOSED ACTION AND ALTERNATIVE

The City is considering an updated subarea plan, new transportation improvements, an area-wide rezone and regulatory amendments to the City Code (Edmonds City Code Title 16) to set the stage for transition of the Highway 99 Corridor study area to a vibrant, pedestrian friendly mixed-use corridor, consistent City direction for the study area. The proposal is based on a comprehensive public stakeholder process as summarized in Section 2.3 of this EIS. The legislative action, if taken, would apply within the study area considered in this EIS.

The alternatives considered in this Draft EIS include No Action (Alternative 1) and the Preferred Alternative (Alternative 2). Under Alternative 1, future growth would continue based on existing development regulations and past development trends. Alternative 2 assumes future mixed use growth with a mix of residential, commercial and office development, an area-wide rezone, amendments to development regulations, and a new vision for the area supported by transportation system improvements...

Key features associated with each alternative are summarized in Table 2.3 and both alternatives are described in more detail following the table.

TABLE 2.3 Alternatives Overview

FEATURES	ALT. 1 NO ACTION	ALT. 2 PREFERRED ALTERNATIVE
New Housing Units by 2035	1,224	3,325
New Jobs by 2035	2,317	3,013
New commercial ft² by 2035	994,958	1,634,685
Comprehensive Plan	No change	Proposed update to Highway 99 subarea maps and text to clearly identify three distinct districts in the subarea anchored around major transportation gateways and employment clusters, see Figure 2.2.
Zoning Designations	No change	Rezoning the CG2and portions of the RM 1.5, RM-2.4, RM-3, BN, and BC zones throughout the study area to CG (see Figure 2.5)
Development Code Amendments	Existing development regulations would remain unchanged	<p>Building height</p> <ul style="list-style-type: none"> - Increase maximum building height in CG zone from 60 feet to 75 feet <p>Transit supportive parking standards</p> <ul style="list-style-type: none"> - Non-residential: 2 spaces/1,000 leasable sf - Residential: minimum average 0.75 spaces per unit over an entire project - Exempt the first 3,000 feet of sf of commercial within mixed use buildings that have a shared parking plan <p>Building frontage standards</p> <ul style="list-style-type: none"> - On a primary frontage, minimum of 50% of primary street frontage should have buildings within 10 feet of front property line (edge of Pedestrian Activity Zone, see below) - 50% of side and rear frontages to have buildings, walks or hedges at least four feet in height within 10 feet of property lines <p>Building transparency standards</p> <ul style="list-style-type: none"> - 50% of primary building frontage façade within two and 10 feet of height, as measured from the adjacent sidewalk, the bottom of which may not exceed four feet above the adjacent sidewalk, should be transparent windows and doors - All other frontages require 30% transparency - Windows shall not be mirrored or have glass tinted darker than 40%. <p>Parking lot location</p> <ul style="list-style-type: none"> - Parking areas may comprise a maximum of 40% of street frontage <p>Pedestrian Activity Zone</p> <ul style="list-style-type: none"> - Designate 10-foot Pedestrian Activity Zone in place of existing Type IV landscape buffer along all primary street frontages with ground floor retail. Future design standards may consider special circumstances, such as auto dealer locations. <p>Ground Floor Setback</p> <ul style="list-style-type: none"> - For frontages on Highway 99, require a front setback of 10 feet to accommodate a Pedestrian Activity Zone - For frontages not on Highway 99, reduce frontage setbacks to five feet and encourage enhanced pedestrian realm (larger sidewalks,

FEATURES	ALT. 1 NO ACTION	ALT. 2 PREFERRED ALTERNATIVE
		usable landscaping, etc.) – Keep current 15-foot setback and 10- foot landscaping requirements for lot lines adjacent to single family zones Upper story setbacks – Adjacent to single family zones provide 10-foot upper story setback for the portion of the building above 25 feet. Provide 20-foot upper-story setback from the lot line for the portion of the building above 55 feet. – Across the street from single family zones provide eight-foot setback for the portion of the building above 25 feet. Provide 16-foot upper story setback from the lot line for the portion of the building above 55 feet.
Transportation Improvements	Future improvements would continue to occur on an incremental basis with new development and as planned by the City’s Transportation Master Plan and WSDOT plans.	Improvements to the Highway 99 Corridor and adjacent local streets would include measures to maintain level of service standards, increase east/west connectivity, provide greater bicycle and pedestrian mobility, and improve access to transit. See Appendix B.

Source: Edmonds 2016; Fregonese 2016; 3 Square Blocks 2016.

SUBAREA PLAN

As noted previously, the proposed action includes adoption of a subarea plan for the Highway 99 Corridor. The proposed subarea plan includes the following elements:

- Introduction
- Vision and Community Values
- Background and Existing Conditions
- Community and Stakeholder Engagement
- Constraints and Challenges
- Opportunities
- Alternative Scenarios
- Implementation Strategies, Policy Recommendations and Actions

The vision and implementation strategies established in the Subarea Plan are summarized below and described in greater detail in the Subarea Plan.

VISION

The Subarea Plan vision represents the themes that surfaced through the community discussions and describe the qualities that the community would like to see in the Highway 99 corridor area. Five major themes are included:

- **Economic Development.** Stimulate the economy by attracting and encouraging new businesses, investment, and redevelopment.

- **Safety and Walkability.** Create a safe and comfortable place for pedestrians, bicyclists, and motorists to move along and get across Highway 99.
- **Housing and Development.** Encourage and incentivize mixed use development, affordable housing, office/commercial and other types of development.
- **Identity.** Establish a distinct identity along the corridor that supports existing cultural destinations and amenities and creates a welcoming and attractive environment for visitors and residents alike.
- **Transportation.** Create more efficient and accessible connections between districts and destinations, and other transit centers/stations.

IMPLEMENTATION STRATEGIES

The recommended implementation strategies in the Subarea Plan generally focus on aligning the City's planning and regulatory structure to support the vision, and to identify those public and private investments that will lead to the vision's realization. Major implementation strategies are generally categorized below and described in greater detail in the Subarea Plan:

- Identification of actions to support public and private investment, including recommendations to amend Edmonds land use and transportation policies and regulations for the entire 99 Subarea
- Specific land use and transportation strategies, actions, policies and investments
- Specific recommended changes to zoning and development standards
- Timing and priority actions - organized into short, medium and long term action items
- Matrix of potential capital improvement projects along with preliminary costing and relevant partner agencies

ALTERNATIVE 1 NO ACTION

FUTURE GROWTH AND DEVELOPMENT PATTERNS

Alternative 1 would continue the current Comprehensive Plan land use designations and zoning classifications with no changes. Future growth would occur according to existing land use designations, zoning designations and development standards. See Figure 2.3 for existing zoning designations.

As shown in Table 2.3, Alternative 1 plans for the less growth in new employment and housing through 2035, compared to the Preferred Alternative. Alternative 1 also plans for relatively more new commercial uses compared to residential uses. Accordingly, commercial development would continue to be the primary use along the corridor. The corridor's existing auto-oriented commercial character, with large paved areas and limited amenities for pedestrians, bicycles and transit users, would likely continue in the future.

Comprehensive Plan

No changes are proposed to existing maps or text.

Zoning Designations

No changes are proposed to existing zoning designations.

Development Regulations

No changes are proposed to development standards or regulations.

Building Heights

Existing development regulations in the GC and GC2 zones, the zones found along the Highway 99 Corridor, allow maximum building heights of 60 and 75 feet, respectively, except in the high-rise nodes, where building heights are not limited (see Figure 2.4). In most cases, however, building heights of existing development is significantly less than these maximum limits. Under the No Action Alternative, it is likely that future development would continue this pattern and new development would consist of relatively low scale and low intensity auto-oriented uses.

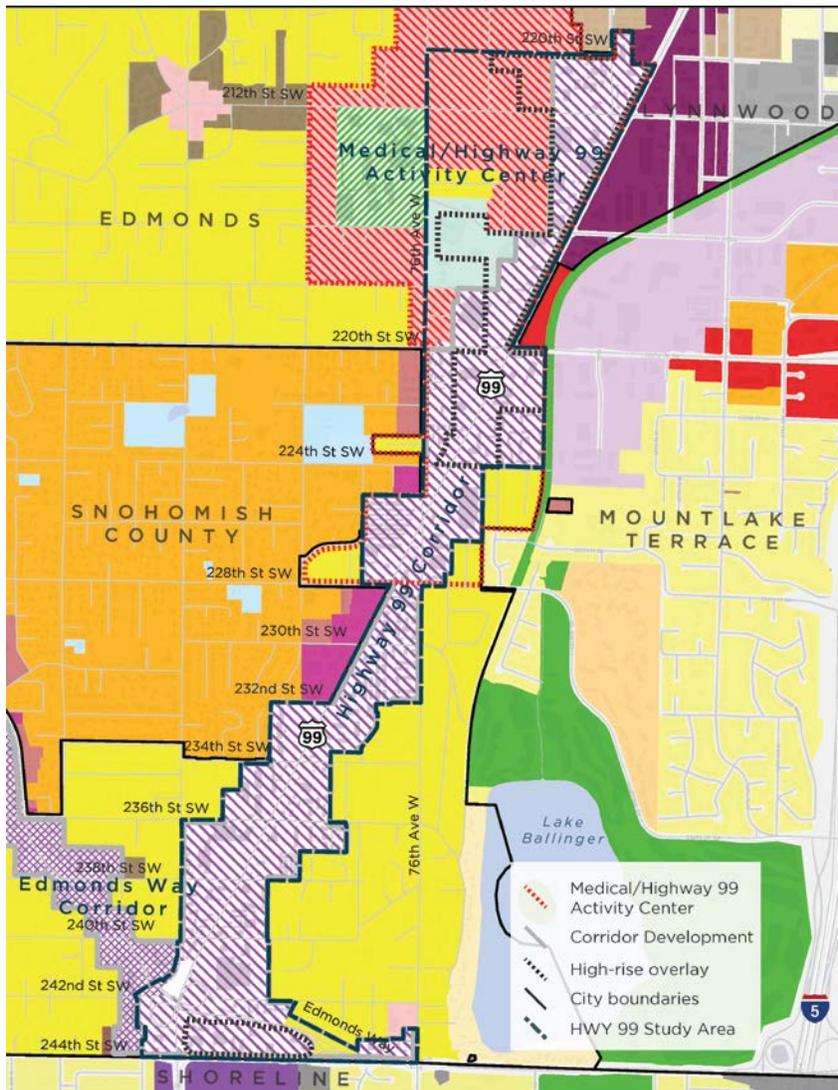
TRANSPORTATION

No new transportation improvement projects to improve pedestrian character, access or mobility are planned. Improvements would continue to occur on an incremental basis, depending on private development proposals and available capital funding through the City of Edmonds and WSDOT.

SEPA REVIEW

A Planned Action Ordinance would not be adopted and proposed future development would be subject to standard SEPA review for individual site-specific proposals.

FIGURE 2.4 Edmonds Comprehensive Plan Land Use Map



EDMONDS FUTURE LAND USE

- Highway 99 Corridor
- Mixed Use Commercial
- Edmonds Way Corridor
- Neighborhood Commercial
- Medical
- Single Family Urban 1
- Single Family - Resource
- Multi Family - Medium Density
- Multi Family - High Density
- Public

MOUNTLAKE TERRACE FUTURE LAND USE

- General Commercial
- Urban Low Residential
- Urban Low Medium Residential
- Urban Medium Residential
- Light Industrial/Office Park
- Park and Open Space

LYNNWOOD FUTURE LAND USE

- HWY 99 Corridor
- Medium Density Multiple Family
- Low Density Single Family
- Industrial

SNOHOMISH COUNTY FUTURE LAND USE

- Urban Commercial
- Urban Medium Density Res
- Urban High Density Res
- Public/Institutional Use

SHORELINE FUTURE LAND USE

- Mixed Use 1
- Low Density Residential
- Public Facility
- Open Space

Source: Edmonds 2016; Fregonese 2016.

ALTERNATIVE 2 PREFERRED ALTERNATIVE

FUTURE GROWTH AND DEVELOPMENT PATTERNS

Overall, Alternative 2 proposes redevelopment of the study area into an area characterized by mixed use development with an increase in residential development and character, greater intensity of development and street-frontage and pedestrian amenities. Compared to Alternative 1, Alternative 2 plans for significantly higher levels of residential and employment growth in the study area (see Table 2.3). Under Alternative 2, the study area would evolve toward a land use pattern that is relatively more balanced between residential and commercial uses, compared to existing conditions.

Comprehensive Plan

The current Comprehensive Plan includes a Highway 99 subdistrict map that designates four focus areas, but does not reflect community interest in a southern “gateway” district that defines the entry into Edmonds. The proposal would establish three focus areas, consisting of a hospital district at the north end, international district in the center and gateway district in the south. Alternative 2 would include map and text updates to the Comprehensive Plan to clearly identify these three distinct districts, see Figure 2.2.

Zoning Designations

Alternative 2 would include an area wide rezone of all of the CG2 and portions of the RM-1.5 RM-2.4, RM-3, BC, and BN zoned areas in the study area to the CG zoning designation, see Figure 2.5.

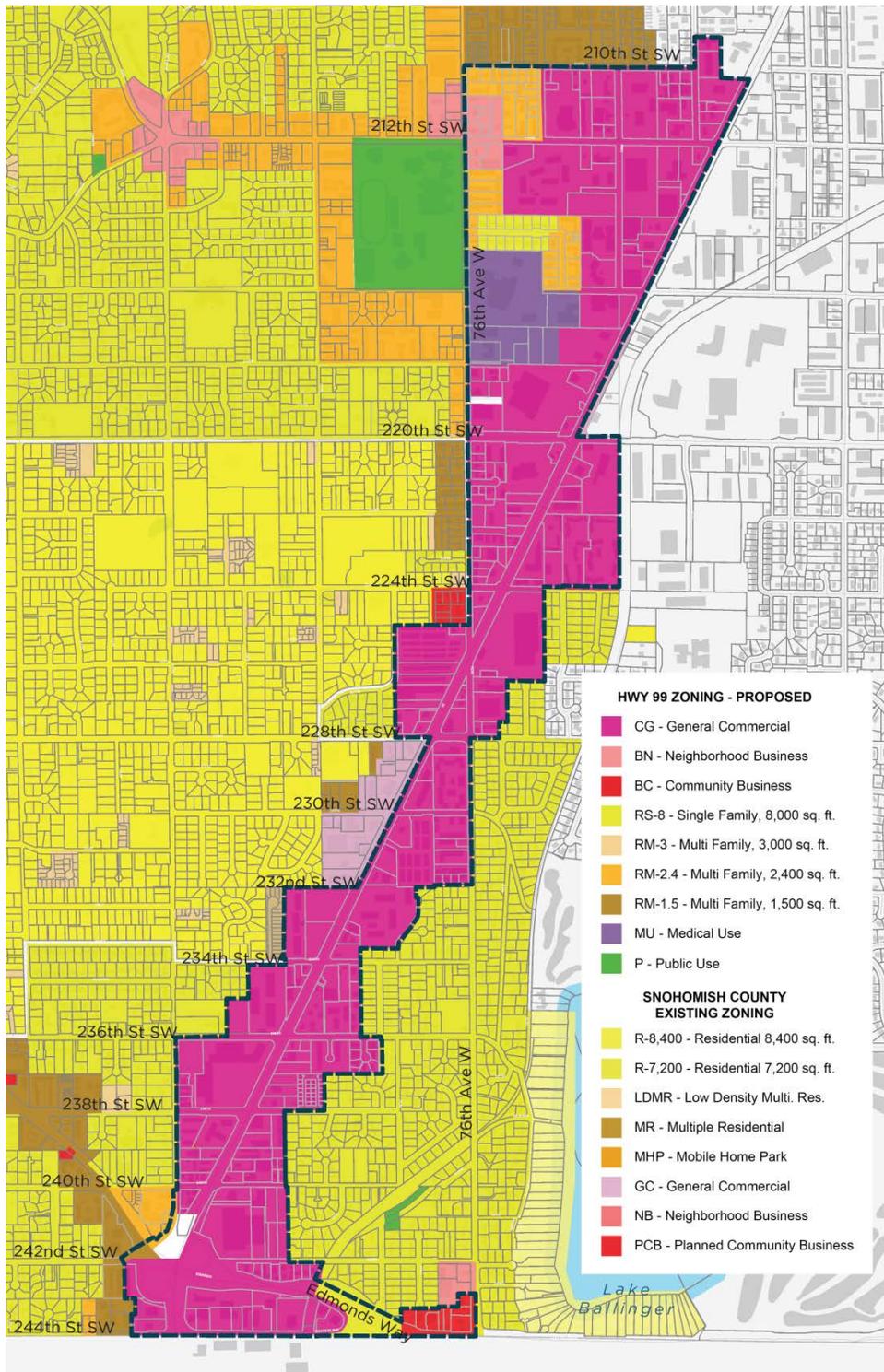
Development Regulations

Edmonds Community Development Code Section 16.60 would be amended to include the revised development code standards shown in Table 2.3.

Building Heights

The proposed height limit in the CG zone is proposed to increase to 75 feet, except within the adopted high rise overlay. The proposed height increase is greater than the existing 60-foot height limit for the CG zone and consistent with the current height limit for the CG2 zone. Some areas that are proposed for rezone to CG are currently in a zoning designation, such as the BC or RM zones, with a 25-foot height limit. The proposed area-wide rezone would allow these locations to re-develop at a maximum height of 75 feet, consistent with proposed CG development standards. It is anticipated that new development along the Highway 99 corridor would be developed closer to maximum building height limits established in the applicable zoning classification, compared to Alternative 1.

FIGURE 2.5 Preferred Alternative Proposed Zoning Designations



Source: Edmonds 2016; Fregonese 2016.

TRANSPORTATION

Transportation improvements to the Highway 99 corridor and adjacent local streets would include measures to maintain level of service standards, increase east/west connectivity, provide greater bicycle and pedestrian mobility, and improve access to transit. Proposed transportation projects would specifically address the following categories of improvements:

- Pedestrian safety and access to SR 99
- Bicycle circulation across and parallel to SR 99
- Pedestrian environment along SR 99
- Safe pedestrian crossings of SR 99 and transit access
- Transit mobility and transit stop environment
- Traffic flow and safe access management

A detailed description of proposed transportation improvement projects is included in Appendix B.

SEPA REVIEW

The Highway 99 corridor study area would be designated as a Planned Action, allowing streamlined environmental review for individual development proposals that are consistent with the planned action designation. This streamlined process would greater efficiency and certainty for new development and increased potential to achieve the vision for the Highway 99 corridor.

2.6 BENEFITS AND DISADVANTAGES OF DEFERRING IMPLEMENTATION

Deferring implementation of the proposal would allow for residential and commercial development to occur in a more scattered and ad hoc manner in the study area over a longer period of time due to lack of substantive civic and infrastructure benefits. In the absence of a catalyst for redevelopment and neighborhood revitalization, economic development would occur more gradually. Benefits of new housing and employment – such as improved transportation safety and mobility and greater local employment – along the Corridor would not occur. Each development would undergo separate environmental review, which would allow public comment on each individual development proposal, but would also lengthen permit review time.

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CHAPTER 3 PREFERRED ALTERNATIVE ANALYSIS

This chapter analyzes the impacts of the Preferred Alternative on the following elements of the environment:

- **Section 3.1:** Land Use
- **Section 3.2:** Relationship to Plans and Policies
- **Section 3.3:** Aesthetics
- **Section 3.4:** Transportation
- **Section 3.5:** Public Services and Utilities

Consistent with the analysis conducted in the Draft EIS, this analysis is programmatic and, unless noted differently, follows the same methodologies described in the Draft EIS. This section of the Final EIS should be read in the context of the Draft EIS because the affected environment section is not repeated. The Preferred Alternative is described in Chapter 2 of this Final EIS.

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SECTION 3.1 LAND USE

3.1.1 IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

GROWTH

Growth is assumed to occur under both alternatives. The alternatives differ in the intensities, types of uses, and design of future development, as well as subsequent impacts on land use patterns, land use compatibility and employment and housing mix.

Under both alternatives, the locations where the highest buildings heights would be allowed are the same. These areas include the currently adopted high rise overlay areas shown on Figure 2.4 and limited locations in the MU zone. As discussed in Affected Environment, there are no height limits on structures in the high rise overlays, and buildings of up to nine stories are allowed in limited locations in the MU zone.

DEVELOPMENT CAPACITY

As discussed in Affected Environment, it is anticipated that existing zoning designations will provide adequate capacity for both alternatives.

IMPACTS OF PREFERRED ALTERNATIVE

LAND USE PATTERNS AND COMPATIBILITY

The Preferred Alternative (Alternative 2) proposes higher growth targets, an area-wide rezone, new development standards, planned transportation improvements and new policy guidance to catalyze transformation of the study area into a lively, pedestrian- and transit-friendly mixed use corridor. These factors would result in a different land use pattern compared to the No Action Alternative (Alternative 1).

Growth Targets

Under the Preferred Alternative, growth targets for jobs and housing in the study area would increase and there would be corresponding increases in the amount of future development. Infill development would likely be of greater height, bulk and intensity than existing development or development expected under the No Action Alternative. With increased infill development, there may be some abrupt transitions in building height, density and intensity, especially in the updated CG zone and the high rise overlay areas. It is likely that these impacts would be limited in magnitude and duration as the area redevelops.

As discussed under Affected Environment, modeling conducted in 2016 by Fregonese indicates that there is sufficient development capacity under existing zoning to accommodate the Preferred Alternative growth targets. The area-wide rezone proposed under Preferred Alternative would further increase development capacity, providing greater flexibility for future growth.

Area-wide Rezone

The area-wide rezone would result in the majority of the study area being able to develop with a mix of uses and relatively tall buildings. The rezone would combine the existing CG and CG2 zones into one CG zone with a 75 foot height limit, and would apply the updated CG zone to portions of the study area currently zoned RM-1.5, RM-2.4, RM-3, BN and BC. This would increase allowed building heights in areas currently zoned CG from 60 to 75 feet. It would increase allowed building heights in the other areas from 25-30 feet to 75 feet, and would also increase the mix of uses allowed in these areas. Existing zoning is shown in Figure 2.3 and proposed zoning is shown in Figure 2.5. The updated CG zone would cover the majority of the study area. Areas where existing non-CG zoning would continue to apply include the Swedish Edmonds Campus and residential zones and a neighborhood business zone directly to the north of the campus, including the only area within the study area currently zoned for single family uses, and limited residential and community business zones on the southeast side and south end of the study area.

The rezone would remove some of the existing transitional zones between areas of the study area where higher intensities are permitted and the surrounding single family residential neighborhoods. To address this, the Preferred Alternative includes new stepback standards for the updated CG zone. The standards are illustrated in Figure 3.1.2. For uses directly adjacent to single family zones, the standards call for upper story stepbacks of 10 feet for portions of buildings 25-55 feet in height, and for stepbacks of 20 feet for portions of buildings above 55 feet. For uses across the street from single family zones, the standards call for similar setbacks of 8 feet for portions of buildings 25-55 feet in height, and 16 feet for portions of buildings above 55 feet. The existing CG zone 15-foot setback and 10-foot landscaping requirements for lot lines adjacent to single family zones would continue to apply. Existing CG zone design standards including standards for screening and buffering adjacent to single family zones would also continue to apply. Together, these standards would mitigate for land use incompatibilities in areas where the updated CG zone is adjacent to single family zones.

FIGURE 3.1.1 Illustration of Proposed Stepback Standards



Source: Fregonese 2017.

Development Standards and Transportation Improvements

The new development standards for updated CG zone and the transportation improvements proposed under the Preferred Alternative would also affect land use patterns, as discussed in more detail in Chapter 3.3 Aesthetics and Urban Design. In general, the proposed changes would result in a land use pattern that is more pedestrian-friendly, with buildings located closer to street frontages, fewer parking areas located between buildings and primary street frontages, more areas designed for pedestrian use, and more pedestrian infrastructure. These changes are not expected to create any new land use incompatibilities and are expected to have a positive impact on quality of life in the study area.

Subarea Plan Policy Guidance

The proposed Subarea Plan supports the area-wide rezone, development standards and transportation improvements described above. It also includes additional policy language that may influence land use patterns, for instance by encouraging transit-oriented development (pg. 53), affordable housing (pgs. 64-65), mixed use and mixed income developments (pgs. 64-65). The impacts of this policy language will depend upon how it is implemented but are not expected to create any new land use incompatibilities, since these types of development are already possible in the study area.

EMPLOYMENT AND HOUSING MIX

The Preferred Alternative assumes more balanced jobs and housing growth than the No Action Alternative, in addition to more overall growth. Approximately 3,300 new housing units and 3,000 new jobs would be developed in the study area by 2035. This growth would change the current ratio of jobs

to housing units from 2.4 to 1.4, creating a more equal balance in jobs and housing compared to existing conditions and to growth planned under the No Action Alternative. This would be a significant change for the character of the study area. New residents would create more of a 24-hour presence in the area and there would be more housing opportunities for those working in the area to live close to their jobs.

3.1.2 MITIGATION MEASURES

INCORPORATED PLAN FEATURES

The zoning code includes provisions to minimize the impacts associated with increases in building height and changes in land use patterns under the Planned Action. The proposed Subarea Plan includes policy language in support of the proposed stepback development regulations, which are intended to help mitigate for potential land use conflicts around the edges of the subarea.

APPLICABLE REGULATIONS AND COMMITMENTS

Zoning designations provide sufficient capacity to accommodate the City's growth targets for the subarea. When combined with the City's remaining existing development and design standards, the Planned Action stepback standards will mitigate for land use incompatibilities in areas where the updated CG zone abuts single family zones.

Additionally, existing development and design standards require site design to be compatible with existing and planned character of the nearby area. Applicable site development standards include those for setbacks, screening and buffering, site design, lighting, building design and massing, and others.

OTHER MITIGATION MEASURES

No additional mitigation measures are recommended.

3.1.3 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse land use impacts are anticipated under either alternative.

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SECTION 3.2 RELATIONSHIP TO PLANS AND POLICIES

3.2.1 IMPACTS

The impacts analysis below considers consistency of state, regional and local plans with the Highway 99 Subarea Plan alternatives.

IMPACTS COMMON TO BOTH ALTERNATIVES

WASHINGTON GROWTH MANAGEMENT ACT

Both alternatives are consistent with the intent of the GMA goals. However, as noted below, Alternative 2 (the Preferred Alternative) allows the City new momentum in reinvigorating the Highway 99 and Medical/Highway 99 activity centers. See Table 3.2.2 for a summary of consistency of the alternatives with GMA goals.

TABLE 3.2.1 Consistency with Growth Management Act Goals

GMA GOAL	DISCUSSION
Encourage growth in urban areas	Both alternatives focus growth in the Highway 99 Corridor. The No Action Alternative (Alternative 1) for 1,224 new households and 2,317 new jobs, consistent with the City’s updated 2015 – 2035 growth estimates. The Preferred Alternative plans for higher levels of growth in the Corridor, with 3,325 new households and 3,013 new jobs by 2035.
Reduce sprawl	Both alternatives either meet or exceed the City’s updated 2015 – 2035 growth estimates for the Highway 99 Corridor. By accommodating growth in the Highway 99 Corridor and Medical/Highway 99 Activity Center, both alternatives contribute to reducing sprawl. Compared to no action, the Preferred Alternative promotes relatively more focused growth in the Corridor, with greater development intensity and compact mixed-use development.
Encourage an efficient multimodal transportation system	Both of the alternatives would support the mobility improvements planned or being considered for the study area. In addition, the Preferred Alternative would include measures to maintain level of service standards, increase east/west connectivity, provide greater bicycle and pedestrian mobility, and improved access to transit. See Appendix B for a description of recommended transportation improvements.
Encourage a variety of housing types, including affordable housing	Both of the alternatives plan for a diversity of housing, including affordable housing. Compared to no action, the Preferred Alternative would provide the greatest amount of overall housing development and would propose implementation of a Multifamily Tax Exemption (MFTE) program for affordable housing (<i>Recommendation #8, February 2017 Draft Highway 99 Subarea Plan</i>). For these reasons, the Preferred Alternative could result in the greatest opportunity for affordable housing to support new residents.
Promote economic development	Both of the alternatives would accommodate the City’s 2015 – 2035 employment growth estimates. Comparatively, the Preferred Alternative would plan for the greatest amount of employment growth (3,013 jobs), followed by the No Action Alternative (2,317 jobs). In addition, the Preferred Alternative identifies strengthening economic opportunity as an important goal supported by several specific implementation strategies (<i>Recommendation #1, February 2017 Draft Highway 99 Subarea Plan</i>).
Recognize property rights	Neither alternative would restrict or constrain reasonable use of property in the study area.
Ensure timely and fair permit procedures	Both alternatives are consistent with the goal of timely and fair permit procedures. The proposal does not include any changes to permit procedures, and it is anticipated that the City would continue to process permits consistent with its adopted code. If adopted, the planned action designation proposed as part of the Preferred Alternative could help streamline future project-level SEPA review.
Protect agricultural, forest and mineral lands	The study area is not located near and would not affect any designated agricultural, forest, or mineral lands.
Retain and enhance open space and support recreation opportunities	The study area does not contain any designated open space or recreational areas. The Preferred Alternative would plan for increased informal gathering spaces, green open space and pedestrian routes in the study area. See Draft EIS Section 3.5 for discussion of open space and recreation impacts associated with the alternatives.

GMA GOAL	DISCUSSION
Protect the environment	Future development under either alternative would be subject to requirements of the City's adopted critical area and stormwater regulations.
Foster citizen participation	Both alternatives allow for citizen participation. The future vision and development scenarios for the study area have been considered through a public outreach process that included community meetings, and online survey and additional opportunities to comment. Additional public outreach is planned for this Draft EIS (see Draft EIS Fact Sheet).
Ensure adequate public facilities and services	As required by GMA, planning and development under both alternatives is required to apply adopted City level of services for public services and utilities. See Draft EIS Section 3.5 for a discussion of public services impacts associated with the alternatives.
Encourage historic preservation	The proposal does not include any changes to the City's current regulations protecting cultural and historic resources. These regulations would continue to apply under both alternatives.

Source: 3 Square Blocks 2016.

VISION 2040

Consistent with the development pattern goals and policies contained in Vision 2040, both alternatives would encourage efficient use of urban land by focusing future growth in the Highway 99 activity centers, as established in the City's vision for this area. Both alternatives would also support the Vision 2040 guidance for enhancing existing neighborhoods to create vibrant, sustainable compact urban communities that provide diverse housing choices and connectivity to accommodate walking, bicycling and transit use.

Consistent with the policy guidance for a Large City in Vision 2040, both of the alternatives would allow the City to establish the Highway 99 corridor as a focal point where people come together for a variety of activities, including business, shopping, living and recreation in an area served by regular local and regional transit. While both alternatives would provide for future transportation mobility, the Preferred Alternative specifically plans for a complete network of sidewalks to improve bicycle and pedestrian mobility and to increase access to transit facilities (see Appendix B).

SNOHOMISH COUNTY COUNTYWIDE PLANNING POLICIES

Consistency of the proposal and alternatives with applicable Snohomish County CPPs is discussed below. Please see the Affected Environment discussion for the full text of the goals.

Development Patterns. Consistent with this goal, both alternatives would plan for a more vibrant activity center on the Highway 99 Corridor. Both alternatives would focus growth in the study area and would promote mixed use development, a more active and vital setting, a pedestrian-friendly atmosphere and an enhanced identity and character along the Corridor. Compared to no action, the

Preferred Alternative would focus more growth along the Corridor, provide for pedestrian and bicycle connectivity and improved access to transit facilities.

Orderly Development. Both alternatives would focus growth in a locally-designated activity center in the City of Edmonds and would provide for adequate urban services to the activity center. Both alternatives are consistent with the CPP goal for orderly development.

Housing. Consistent with this goal, both alternatives would provide increased housing opportunities located near transportation facilities and employment centers, such as the Medical/Highway 99 Activity Center. To varying degrees, both alternatives would also support infill development to provide increased housing opportunities in the study area, which is likely to be associated with increased options for affordable housing. In addition, the Preferred Alternative would support implementation of the MFTE program for affordable housing (*Recommendation 8, February 2017 Draft Highway 99 Subarea Plan*).

Economic Development and Employment. Both alternatives would provide additional employment opportunities in the study area, building on the strength of existing economic drivers, such as the Swedish/Edmonds campus. Among the alternatives, the Preferred Alternative would plan for the greatest number of jobs. In addition, the Preferred Alternative identifies strengthening economic opportunity as an important goal supported by several specific implementation strategies (*Recommendation 1, February 2017 Draft Highway 99 Subarea Plan*).

Transportation. Both alternatives are consistent with this goal to varying degrees. The Preferred Alternative explicitly plans for an improved transportation network that would include measures to maintain level of service standards, increase east/west connectivity, provide greater bicycle and pedestrian mobility, and improved access to transit. The No Action Alternative would continue to plan for improvements to the Highway 99 Corridor in conjunction with new development and as capital funds are available.

CITY OF EDMONDS COMPREHENSIVE PLAN

TABLE 3.2.2 City of Edmonds Comprehensive Plan Goals

GOAL	DISCUSSION
LAND USE ELEMENT: Medical/Highway 99 Activity Center	
Goal A	To the extent that the proposal includes a planned action designation that would streamline future project-level SEPA review, the Preferred Alternative is most consistent with the intent of Goal A. Neither alternative would preclude additional incentives for business and commercial redevelopment in the activity centers.
Goal B	Both alternatives are intended to provide an aesthetically pleasing business and residential community in a mixed used, pedestrian friendly setting. Compared to the No Action Alternative (Alternative 1), the Preferred Alternative (Alternative 2) contains additional measures to promote a pedestrian-friendly environment, including capital improvement projects to provide greater bicycle and pedestrian mobility, improved access to transit, and enhanced landscaping and hardscaping in pedestrian areas.

GOAL	DISCUSSION
Goal C	Consistent with Goal C, both alternatives focus greatest development intensity, including greatest building height and bulk, along the Highway 99 Corridor. In addition, the Preferred Alternative includes specific capital improvement projects to promote pedestrian linkages and east-west connectivity in the adjoining areas around the Corridor.
Goal D	Consistent with Goal D, both alternatives propose to promote development of a mixed use area served by transit and accessible to pedestrians. Compared to no action, the Preferred Alternative provides greater support for this goal through the proposed adoption of a planned action ordinance and specific capital improvement projects to enhance a pedestrian-friendly environment, increased connectivity and enhanced access to transit service.
Goal E	Both alternatives are consistent with the established standards to provide a buffer between the high intensity, high-rise commercial areas along SR 99 and the established neighborhoods west of 76 th Avenue West.
Goal F	Both alternatives would discourage strip commercial development and encourage a functional and cohesive mixed use activity center. In particular, the Preferred Alternative would include standards and guidelines to support a pedestrian activity zone, locate parking to the rear of the site, and promote ground floor transparency – all intended to encourage pedestrian activity and a vibrant street character. Consistent with this goal, the Preferred Alternative also includes a recommendation for facilitation of a mixed-use, mixed income demonstration project.
Goal G	Compared to no action, the Preferred Alternative provides greater focus and emphasis on providing integrated pedestrian and bicycle circulation that connect the activity centers to residential areas, the high school, the hospital and transit services. These include new bicycle route designations and lanes, street frontage improvements for pedestrians and new pedestrian crossings. See Appendix B for a description of proposed improvements.
LAND USE ELEMENT: Highway 99 Corridor Activity Center	
Goal A	While both alternatives are generally consistent with the goal for improved access and circulation, the Preferred Alternative provides greater emphasis on this goal, compared to no action. As noted previously, the Preferred Alternative includes a comprehensive package of transportation improvement projects intended to maintain level of service standards, increase east/west connectivity, provide greater bicycle and pedestrian mobility and improve access to transit. See Appendix B for a description of proposed improvements.
Goal B	<p>Both alternatives would provide a system of focus areas along the corridor. As shown in the Figure 3.2.2, the No Action Alternative provides for four focus areas. From north to south, these include the Hospital Community and Family Retail Center, the International District, the Residential Area Retail Center, and the Commercial Redevelopment/Hotels Improvement Area. The Preferred Alternative would retain the focus areas concept, but would simplify the system to consist of three districts – the Health District, the International District, and the Gateway District. While consistent in overall intent and direction for development along the Highway 99 Corridor, these proposed districts are not specifically consistent with the focus areas shown in the Comprehensive Plan.</p> <p>The Draft Highway 99 Subarea Plan (February 2017) includes a recommendation (Recommendation 3) to replace the current Comprehensive Plan maps and text with updated materials that clearly identify the three distinct districts anchored around major transportation gateways and employment clusters, such as the hospital and international businesses). Implementation of this recommended action would bring the existing Comprehensive Plan and Highway 99 Subarea Plan into alignment.</p>

GOAL	DISCUSSION
Goal C	Both alternatives would encourage development that is sensitive to surrounding neighborhoods. In particular, the Preferred Alternative would encourage development to the fullest extent possible while ensuring that design qualities and amenities enhance the overall character and quality of the Corridor, including upper-story setbacks for buildings adjacent to or across the street from single family zones. The Preferred Alternative would also promote pedestrian connections to link residents to commercial and service uses along the Corridor.
Goal D	Both alternatives would encourage a variety of uses and building types. The No Action Alternative emphasizes development variety based on the focus areas established in the Comprehensive Plan. The Preferred Alternative would focus development according to the three districts established in the Subarea Plan. The Draft Highway 99 Subarea Plan (February 2017) includes a recommendation (Recommendation 3) to replace the current Comprehensive Plan maps and text with updated materials that clearly identify the three distinct districts anchored around major transportation gateways and employment clusters, such as the hospital and international businesses). Implementation of this recommended action would bring the existing Comprehensive Plan and Highway 99 Subarea Plan into alignment.
URBAN DESIGN ELEMENT	
Goal C	The proposal and alternatives are consistent with adopted policy guidance to encourage a feeling of identity associated with different sections of the Corridor. As noted previously, the focus areas identified in the Comprehensive Plan and the proposed Subarea Plan are similar, but have some slight differences. Both alternatives are consistent with the site design and landscaping and buffering guidance provided under Urban Design Goal C. Specific design standards included in the Preferred Alternative, but not in the No Action Alternative, include building transparency standards, creation of a pedestrian activity zone, focusing parking lots away from the street frontage, ground floor setbacks and upper-level step backs adjacent to single family zones.
ECONOMIC DEVELOPMENT ELEMENT	
Policy B.8	Both alternatives would promote distinct business districts, such as the Highway 99 International District and the Swedish Hospital Medical District, consistent with this policy.
Policy B.9	Both alternatives would be consistent with this policy guidance to seek appropriate redevelopment in emerging business districts, such as the Highway 99 medical services district. As noted previously, the Preferred Alternative would provide a greater emphasis on walkability and amenities, compared to no action.

Source: Edmonds 2015a.

CITY OF LYNNWOOD COMPREHENSIVE PLAN

In the City of Lynnwood, the Highway 99 (H99), Multifamily Residential (MF-2), land use designations would adjoin the Mixed Use designation for the Medical/Highway 99 Activity Center and/or the Highway 99 Corridor land use designation in the City of Edmonds (see Figure 2.4). These City of Edmonds' designations are similar to and compatible with the City of Lynnwood H99 mixed use and MF-2 multifamily designations. No adverse impacts are anticipated as a result of the adjoining City of Lynnwood and City of Edmonds land use designations.

The City of Lynnwood Highway 99 Subarea Plan provides a plan for Highway 99 north of the City of Edmonds. Much of the policy direction provided in Lynnwood's Subarea Plan is similar to and consistent

with direction established by the City of Edmonds Comprehensive Plan for the Highway 99 Corridor. Specifically, both plans seek to provide a mix of commercial uses and vibrant residential neighborhoods, create nodes of activity, provide linkages between the Highway 99 corridor and surrounding areas, improve the identity and character of the corridor, and improve safety. Because both cities are planning for a consistent vision, range of uses and character along the Highway 99 corridor, no potential policy conflicts are anticipated.

CITY OF SHORELINE COMPREHENSIVE PLAN

The majority of the area in the City of Shoreline adjoining the study area is designated as Mixed Use 1 (See Figure 2.4) and intended for a mix of retail, office and form-based maximum density residential development. This designation adjoins area in the City of Edmonds as Highway 99 Corridor and the two designations propose a range of uses and development character that are similar and consistent with each other. To the east and west of the Mixed Use 1 designation, property in Shoreline designated as Public Facility and Low Density Residential adjoins the City of Edmonds Highway 99 Corridor designation. In this area, NW 205th Street/244th Street SW provides a physical separation between the two jurisdictions, reducing the potential for conflict between developments in the two designations. In addition, City of Edmonds development standards, including setbacks, screening and buffering, site design and layout, lighting, building design and massing, and operating restrictions should further reduce potential land use conflicts.

CITY OF MOUNTLAKE TERRACE COMPREHENSIVE PLAN

As described previously, two areas within the City of Mountlake Terrace adjoin the study area (see Figure 2.4). The first area, designated as Urban Low Residential, is bounded to the north, west and south by properties in the City of Edmonds with a similar designation (Single Family – Urban 1). Similar to residentially-designated properties in the City of Edmonds, a small number of properties in the area adjoin the Highway 99 Corridor land use designation, which provides for a range of commercial, residential and mixed use development. Potential land use conflicts between the lower intensity single family residential designation and adjoining commercial land uses should be addressed through City of Edmonds development standards, including setbacks, screening and buffering, site design and layout, lighting, building design and massing, and operating restrictions. In addition, the Preferred Alternative would include specific upper-level stepback standards to minimize any potential land use compatibility impacts. Please see the Land Use Element of this Draft EIS for additional discussion of potential land use conflicts.

The second area, designated as General Commercial, adjoins the City of Edmonds Highway 99 Corridor designation. These two designations are compatible and no adverse impacts are anticipated.

SNOHOMISH COUNTY COMPREHENSIVE PLAN

In unincorporated Snohomish County, properties adjoining the study area, including those properties adjoining Highway 99, are designated UHDR and UC (see Figure 2.4). These designations provide for high density residential and commercial uses consistent with the City's vision for Highway 99. The only

exception to this is a small area on the north side of 244th St SW, which is designated as UMDR. These properties adjoin a cul-de-sac in the City of Edmonds designated as Single Family – Urban 1, a designation that is similar to the County’s UMDR designation. Both of these areas are currently developed with single family residential homes. Because these combined areas are relatively small, they do not represent a significant conflict in land use designations. However, because they are surrounded on multiple sides by more intensive land use designations in both Snohomish County and the City of Edmonds, it may be appropriate to consider a more intensive land use designations for these areas in the future.

COMMENTS

Community Transit suggested that suggested this section could also reference their Transit Development Plan, their Long Range, and Sound Transit 2.

3.2.2 MITIGATION MEASURES

INCORPORATED PLAN FEATURES

- The locally-designated role of the Highway 99 Corridor will continue to be maintained and reinforced through the plan vision for a high density, walkable mixed-use neighborhood with urban amenities.
- Within the Planned Action, amendments to the Comprehensive Plan clearly identify three distinct districts anchored around major transportation gateways and employment clusters, such as the hospital and international businesses (*Recommendation 3.1, February 2017 Draft Highway 99 Subarea Plan*). These amendments will bring the Comprehensive Plan and recommended Highway 99 Subarea Plan into alignment.

REGULATIONS AND COMMITMENTS

- As required by the Growth Management Act (GMA), the draft Subarea Plan and regulations have been submitted to the Washington Department of Commerce for review and comment prior to final adoption.

OTHER PROPOSED MITIGATION MEASURES

- No additional mitigation measures are recommended.

3.2.3 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse impacts are anticipated with respect to future subarea plan consistency under either alternative.

SECTION 3.3 AESTHETICS

3.3.1 IMPACTS

IMPACTS COMMON TO BOTH ALTERNATIVES

Growth is assumed to occur under both alternatives and over time this would impact the aesthetic character of the area. Although the alternatives differ in the intensities, locations and types of uses assumed for future growth, a more dense future land use pattern that makes fuller use of available development envelopes than in the past is expected under both alternatives. The locations where the highest buildings heights would be allowed are the same under either alternative. These areas include the currently adopted high rise overlay areas shown on Figure 2.4 and limited locations in the MU zone. As discussed in Affected Environment, there are no height limits on structures in the high rise overlays, and buildings of up to nine stories are allowed in limited locations in the MU zone.

There would be overall improvements in the aesthetic appearance of the study area as new development occurs under both alternatives, but the types of improvements would differ. Improvements under the No Action Alternative would be subject to the City's current design and development standards. Improvements under the Preferred Alternative would be guided by new design and development standards and would also be influenced by new policy guidance and transportation improvement projects in the proposed Subarea Plan.

IMPACTS OF PREFERRED ALTERNATIVE

The Preferred Alternative (Alternative 2) proposes changes to the Comprehensive Plan Highway 99 Corridor focus areas, new policy guidance for the urban form of the study area, higher growth targets, an area-wide rezone, new development standards and planned transportation improvements. These changes are intended to help transform the aesthetics and urban design of the study area into a more vibrant urban corridor with a distinct identity and unique neighborhoods that are pedestrian- and transit-friendly.

NEIGHBORHOOD CHARACTER

All of the changes proposed under the Preferred Alternative could impact neighborhood character. In general, the impacts are expected to be positive and to support the community's vision for the study area.

Comprehensive Plan Amendment

As described under Affected Environment, the existing Comprehensive Plan includes a Highway 99 subdistrict map that designates four focus areas but does not reflect current community interest in a southern gateway district that defines entry into the subarea and the City of Edmonds. The Preferred Alternative would amend the Comprehensive Plan to establish three focus areas in the study area, consisting of a hospital district at the north end, international district in the center and gateway district in the south. The proposed districts are shown in Figure 2.2. The impact of this policy change will depend upon how it is implemented, however is likely to have the greatest effect on neighborhood character in the southern portion of the study area, since the two other proposed districts are relatively consistent with existing Comprehensive Plan guidance. As noted in the Subarea Plan, the prior district designations identified the southern portion of the study area as "Residential Retail Center" and "Hotels Area Improvement." The proposed designation would allow these types of uses to continue, but would also emphasize creation of a clear entry point in and out of Edmonds.

Subarea Plan Policy Guidance

The Subarea Plan that is proposed for adoption under the Preferred Alternative includes policy guidance for aesthetics and urban design. This includes policies that call for using signage to identify the south end of the gateway district, to identify a transit hub at the intersection of Highway 99 and 228th St SW, to improve wayfinding along the corridor, to strengthen economic opportunity through design, to develop a unique district design identity, and to prohibit new pole signs (Subarea Plan, pgs. 52, 68-70); to encourage transit-oriented development, green building, affordable housing, mixed use and mixed income developments (Subarea Plan, pgs. 53, 64-65); and to conduct an area-wide rezone and make corresponding updates to design and development standards (Subarea Plan, pgs. 55-62). The impacts of these policies will depend upon how they are implemented, but are generally expected to foster neighborhood character that is lively, urban, mixed-use, pedestrian- and transit-friendly. The Preferred Alternative includes proposed new design and development standards to begin implementing certain Subarea Plan policies; these are discussed in more detail below.

HEIGHT, BULK AND SCALE

The Preferred Alternative plans for more jobs and housing growth compared to no action. Additionally, new design and development standards proposed under the Preferred Alternative include an area-wide rezone and increases in allowed building heights. Together, these elements of the proposal could result in more intense height, bulk and scale of new development in the study area compared to future growth under the No Action Alternative.

The rezone would combine the existing CG and CG2 zones into one CG zone with a 75 foot height limit, and would apply the updated CG zone to some portions of the study area currently zoned RM-1.5, RM-2.4, RM-3, BN and BC. This would increase allowed building heights in areas currently zoned CG from 60 to 75 feet. It would increase allowed building heights in the other areas from 25-30 feet to 75 feet, and would increase the mix of uses allowed in these areas.

The rezone would also remove some of the existing transitional zones between areas of the study area where greater building intensities are permitted and the surrounding single family residential neighborhoods. To address this, the proposed development regulations include new stepback standards for the updated CG zone that would create transitions in height and bulk between buildings in the updated CG zone and in single family zones. Additionally, many existing CG zone design standards for setbacks, screening and buffering adjacent to single family zones would continue to apply. See the discussion of the area-wide rezone in Chapter 3.1 Land Use for additional information.

STREETSCAPE

New design and development standards are proposed under the Preferred Alternative that would transform the study area's streetscape as new development takes place over time. Also, transportation improvements called for in the proposed Subarea Plan would increase pedestrian, bicyclist and transit infrastructure (See Appendix B). Such changes would support more street-level activity with people walking or biking to services and jobs, which could in turn increase the sense of community safety and vitality in the study area.

The proposed new design and development standards include the stepback requirements discussed in the prior section, as well as increased minimum setbacks to allow space for a new Pedestrian Area between buildings and streets, new requirements for building site placement and transparency, and changes to parking requirements. These code changes are envisioned to work together to create a walkable and attractive urban environment, with businesses located next to sidewalks, landscaped buffers between people and vehicle traffic on main roads, human-scale building materials, and less visually prominent parking areas compared to current conditions. These code changes are expected to have positive impacts on aesthetics and urban design. Additionally, many existing design and development standards for the study area would remain in place under the Preferred Alternative and would provide for some consistency as new development occurs.

Transportation improvements are proposed under the Preferred Alternative to enhance the pedestrian and bicyclist environment and improve mobility and access to transit in the study area. Key projects identified in the Subarea Plan include adding a crosswalk at the intersection of Highway 99 and 234th St SW, to close the most significant gap in pedestrian crossings within the corridor, and improving pedestrian access at the SR 104 interchange, at the gateway to the study area (Subarea Plan, pgs. 77-78). Other proposed projects would address the pedestrian environment along Highway 99, transit station area environments, and multimodal safety and access. See Chapter 3.4 Transportation and Appendix B for additional detail on the planned improvements. As with the proposed new design and

development standards, the transportation improvements are expected to have a positive impact on aesthetics and urban design.

3.3.2 MITIGATION MEASURES

INCORPORATED PLAN FEATURES

The City's Highway 99 Corridor and Medical/Highway 99 Activity Center Comprehensive Plan Map designations within the Comprehensive Plan will guide aesthetic improvements under the planned action. Such improvements shall make the area more attractive and pedestrian friendly by:

- ensuring that the design of new development contributes to the quality and character of the area
- encouraging a variety of building types
- using landscaping and buffering to soften street fronts and to provide transitions between more and less intensive uses
- fostering distinct sub-district identities consistent with the Highway 99 Corridor Vision.

Additionally, the Planned Action contains policy guidance and recommended transportation improvement projects that are intended to enhance the aesthetics and urban design of the study area and support the community's vision for the future neighborhood character of the corridor. The policy guidance calls for improvements in signage and wayfinding, using design to strengthen business opportunity, development of a unique district design identity, supporting building types and uses typical of vibrant urban corridors, and making code updates to support more pedestrian- and transit-friendly building forms and streetscapes.

REGULATIONS AND COMMITMENTS

Development under the Planned Action will be required to comply with existing development and design standards including those for setbacks, screening and buffering, site design, lighting, building design and massing, and others. These standards require site design to be compatible with existing and planned character of the nearby area.

Additionally, the Planned Action setback standards provide for transitions in building height and bulk between portions of the subarea zoned for the highest intensity uses and adjacent single family zoned areas.

OTHER MITIGATION MEASURES

No additional mitigation measures are recommended.

3.3.3 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable adverse land use impacts are anticipated under either alternative.

SECTION 3.4 TRANSPORTATION

This section of the EIS describes the affected environment, analyzes potential impacts, and provides recommendations for mitigation measures for multimodal transportation, including motor vehicle traffic, transit, bicycle, and pedestrian modes. The impacts section describes the assumptions and methods used to forecast and evaluate future travel demand; analyzes conditions with development under the alternatives, implementation of the City's planned multimodal improvements, and features of the proposed Subarea Plan that support and encourage the use of transit, bicycle and pedestrian facilities. The impacts section, which identifies potential impacts to traffic, transit, and pedestrian and bicycle modes of transportation, is followed by the mitigation measures section which recommends capital improvements and programmatic approaches to lessen transportation impacts to less than significant.

Figure 3.4.2 Existing and Planned Transit System

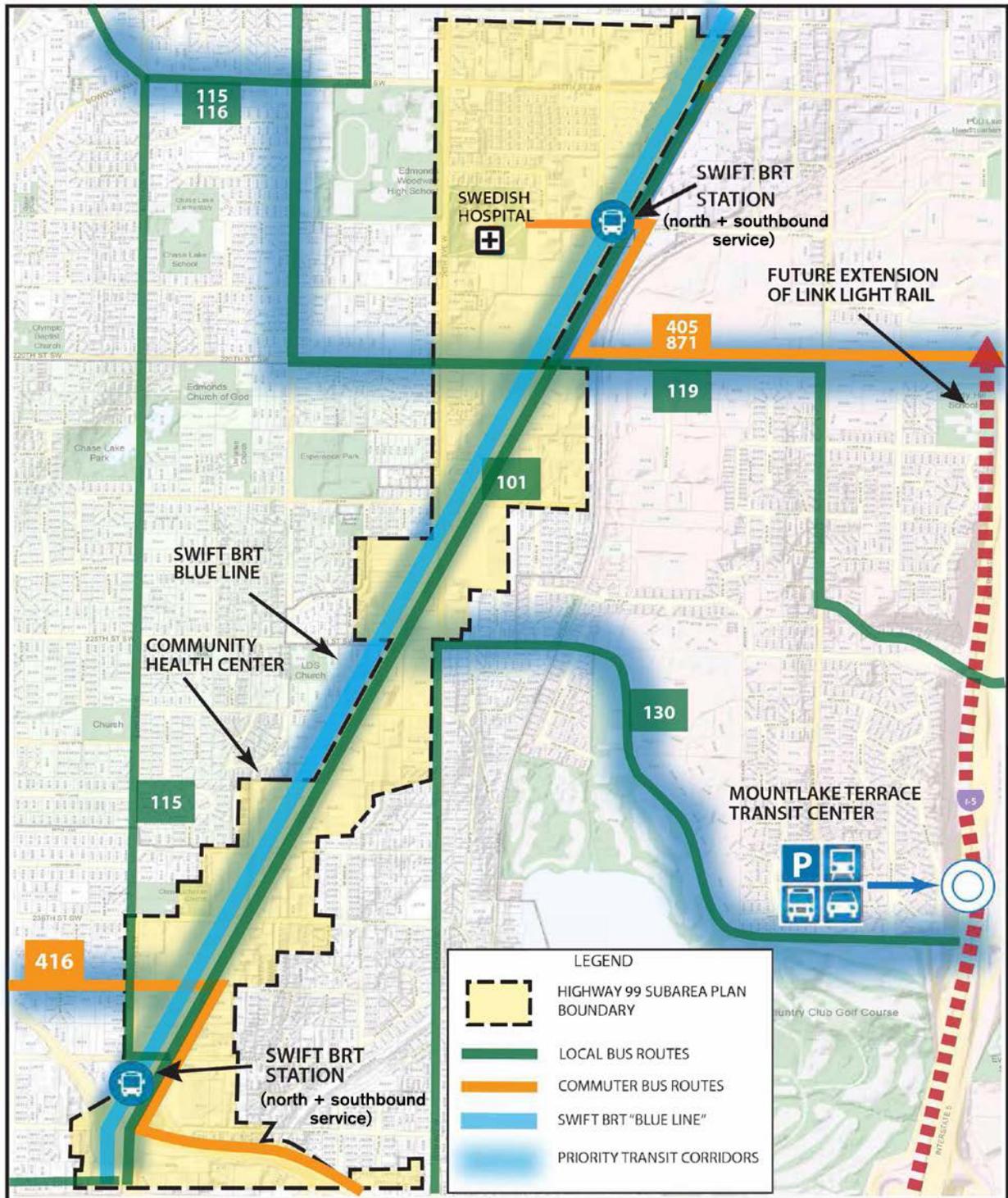


FIGURE 3.4.2
EXISTING AND PLANNED TRANSIT SYSTEM

Source: DKS Associates 2017.

Figure 3.4.3 Existing and Planned Bicycle System

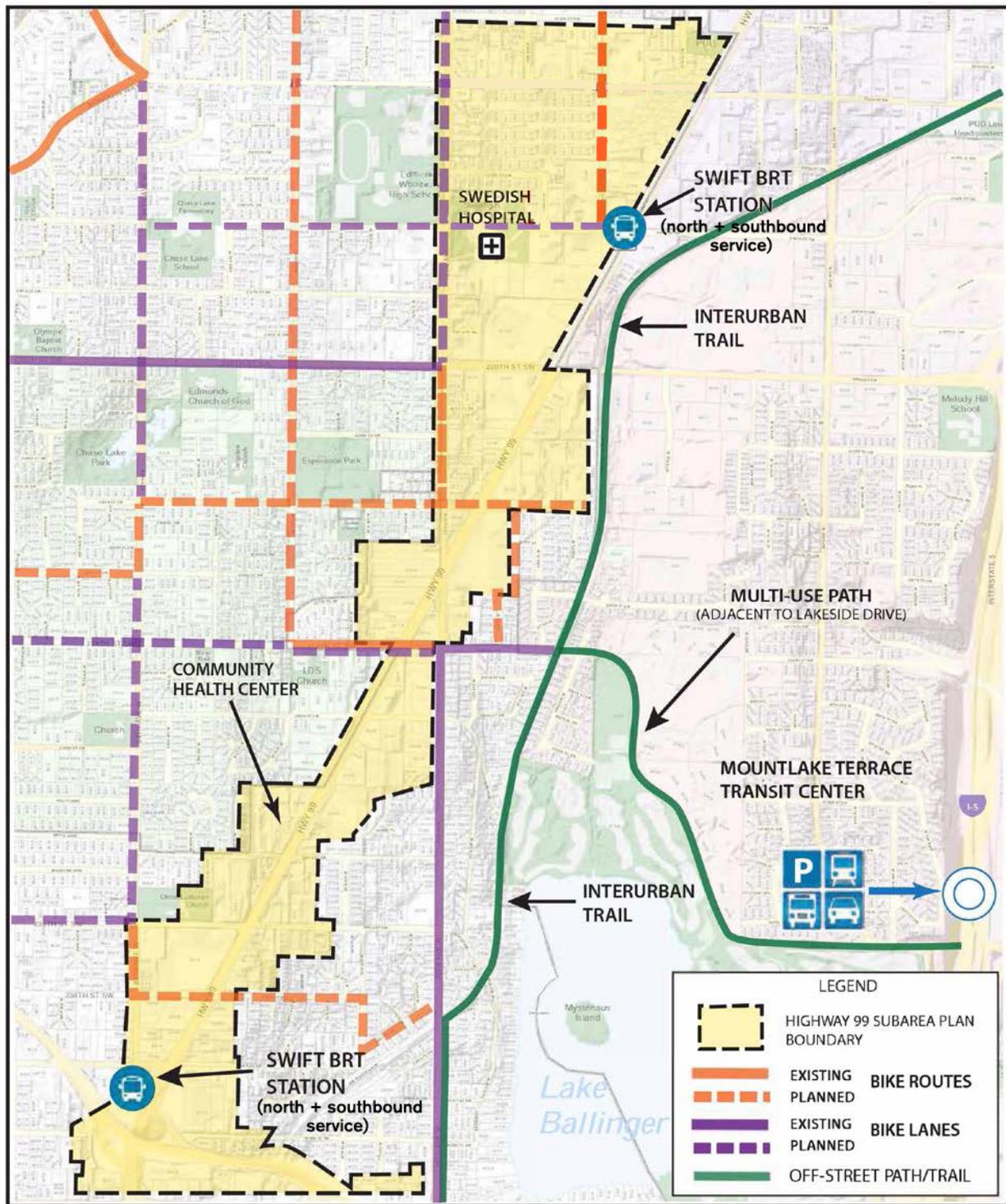


FIGURE 3.4.3
EXISTING AND PLANNED BICYCLE SYSTEM

Source: DKS Associates 2017.

3.4.1 IMPACTS

PROJECTED 2035 TRAFFIC VOLUMES

METHODOLOGY

This section describes the procedure used to develop the year 2035 traffic projections for the No Action Alternative (Alternative 1) and the Preferred Alternative (Alternative 2). The traffic projections build off of the year 2035 traffic forecasts prepared for the 2015 Comprehensive Transportation Plan update. The projections were developed using a citywide travel demand forecasting model which estimates traffic based on land use projections. The citywide growth in housing and jobs between 2014 and 2035 used in the Comprehensive Transportation Plan update included:

- 800 Single Family dwelling units
- 2,080 Multi-Family dwelling units
- 840 Retail jobs
- 1,410 Service jobs
- 30 Industrial jobs
- 970 students

The citywide land use projections include some level of growth within the study area based on allowable land uses and residential densities and commercial floor area ratios. Because a regional travel demand forecasting model was used as the framework for developing the citywide model, the model included regional travel demand to and from Edmonds, or demand passing through Edmonds without stopping (through traffic). These 2035 Comprehensive Plan projections produced a credible starting point for the subarea forecasts. The forecasting procedure for the No Action and Preferred Alternative is the same and described below:

1. Disaggregate the growth targets for the alternatives into the City's Traffic Analysis Zone (TAZ) system, including estimates of the growth in residential and commercial land uses and estimates of the existing land use that will be replaced by redevelopment of the study area.
2. For each TAZ in the study area, calculate the trip generation of the new growth and the existing land use to be redeveloped using standard rates from the Institute of Transportation Engineers (ITE). These initial traffic estimates reflect typical isolated land uses in suburban environments where most trips are by automobile, and require adjusting.
3. Subtract the traffic estimates of the existing land uses to be redeveloped from the traffic estimates of the new growth. This step eliminates the potential for double counting traffic from displaced land uses and results in estimates of the net new traffic generated by the land use growth in the study area.
4. Adjust the traffic estimates from step two to reflect the travel characteristics of the type of development envisioned in the proposed subarea plan (development that is compact and concentrated at key centers and nodes, with higher density residential and more intense

commercial, with a range of land use types in mixed-use buildings served by a robust rapid transit system within an attractive and walkable / bikeable environment). Adjustments to the trip generation estimates are described in the section on trip generation.

5. Distribute and assign the net new traffic generated within each TAZ to the street network and study intersections and add these new trips to the year 2035 projections at each study intersection resulting in revised 2035 traffic projections that reflect the regional and citywide demand in the Highway 99 corridor and the travel characteristics of the study area’s compact, transit-oriented, mix of land uses.

LAND USE ASSUMPTIONS

Table 3.4.3 summarizes the land use forecasts used to estimate the trip generation of both alternatives. Note that the amount of land use to be replaced by redevelopment is a negative number representing a removal of trips in the trip generation estimation step.

Table 3.4.3 Land Use Assumptions for Alternatives

LAND USE ALTERNATIVE	MF RESIDENTIAL REPLACED BY REDEVELOPMENT (Dwelling Units)	NEW MF RESIDENTIAL (Dwelling Units)	NEW SF RESIDENTIAL (Dwelling Units)	RETAIL DISPLACED BY REDEVELOPMENT (Square Ft)	NEW RETAIL SPACE (Square Ft)	NEW OFFICE SPACE (Square Ft)
No Action Alternative	(70)	1,096	133	(82,563)	119,951	875,007
Preferred Alternative	(211)	3,520	NA	(220,644)	512,685	1,121,999
Difference	(141)	2,424	(133)	(138,081)	392,734	246,991

MF = Multi-Family

Source: Fregonese 2017.

As shown in the table, the Preferred Alternative projects more than twice the number of residential units and substantially more commercial land use within the study area than the No Action Alternative. In particular, the difference in office space between the alternatives reflects the development opportunities for medical office space and other hospital-supportive uses in response to the planned expansion of the Swedish Hospital in the corridor’s health care district.

Appendix D contains a breakdown of the alternative land use growth targets by TAZ.

TRIP GENERATION

Methodology

The primary source of trip generation data for land uses is in a publication titled Trip Generation (currently in its 10th edition) produced by the Institute of Transportation Engineers (ITE). Trip Generation is a compilation of thousands of studies of the trip-making characteristics of specific land uses. Traffic counts and land use data—which has been collected since the 1960s—is used to establish a correlation between traffic and the type and size of land uses.

For ease of collecting data, most of the sites where the data was collected are single use sites (only one land use occupies the site), isolated from surrounding land uses by surface parking and large landscaped areas. These sites are typically found in suburban locations with infrequent or no transit service and ample free or subsidized parking. The sites often have high quality pedestrian and bicycle facilities, but are widely segregated from other land uses by zoning and long distances making active transportation modes non-viable. In these locations the data consistently shows the single-occupant-vehicle as the predominant mode of transportation.

When estimating traffic for infill development in urbanized places with certain characteristics, it is common practice to make adjustments to the traffic estimates derived from standard ITE trip generation rates. Characteristics of the development and the surrounding context that justify adjustments to standard rates include:

- Development in the form of buildings vertically mixed with high density residential or office above ground floor retail, or horizontally mixed in close proximity;
- Development located in a compact district with a diverse mixture of housing, commercial and employment uses where residents and workers can fulfil many of their daily needs by walking, biking, and short automobile trips between complementary land uses on the same site or nearby that reduce the amount of traffic to the corridor’s external gateways; and
- An area served by a frequent and efficient transit system supported by a connected system of pedestrian and bicycle facilities.

The adjustments applied to the initial trip generation estimates of both alternatives include:

- Reduction in residential, office, and to a smaller extent, retail trips reflecting the use of transit.
- Reduction in residential, retail, and to a smaller extent, office trips reflecting the use of active modes of transportation.
- Adjustment to retail trips to reflect “pass-by” trips—existing traffic that is already traveling on streets adjacent to the retail site and stop at the site as an intermediate stop.
- Internal capture of trips within mixed-use sites or districts.

The trip generation reductions for transit and active modes of transportation are less in the No Action Alternative than in the Preferred Alternative. This difference in trip adjustment reflects the difference in the anticipated travel characteristics resulting from the type, density, and mix of land uses and the larger investment in multimodal improvements in the Preferred Alternative.

Appendix E contains detailed tables that step through the process used to calculate the initial trip generation estimates and apply the adjustments described above.

Trip Generation Estimates

Table 3.4.4 summarizes the estimated PM peak hour trip generation (adjusted as described above) for both alternatives. Because of its higher growth in both residential and commercial uses, the Preferred Alternative (Preferred) generates about sixty percent more PM peak hour trips than the No Action Alternative, primarily from the difference in residential-generated trips. About forty percent of these trips remain internal to the study area with the remaining sixty percent traveling external to the study area.

Table 3.4.4 Comparison of PM Peak Hour Trip Generation by Alternative

LAND USE ALTERNATIVE	NET NEW PM PEAK HOUR TRIP GENERATION			
	MF Residential Trips	Retail Trips	Office Trips	Total Trips
No Action Alternative	597	(5)	1,157	1,749
Preferred Alternative	1,293	159	1,302	2,755
Difference	696	164	145	1,006

MF = Multi-Family

See Appendix E for a breakdown of the trip generation by Traffic Analysis Zone (TAZ) including trip reductions.

Source: DKS Associates 2017.

TRANSPORTATION NETWORK ASSUMPTIONS

This section summarizes improvements to the future multimodal transportation system that are relevant to the study area. The effects of improvements that modify the capacity of a signalized study intersection (such as the addition of lanes or changes in signal operations) can be quantified in the traffic analysis by changes in delay and level of service that can result in a measurable offset to the effect of growth on the operation and LOS of an intersection. Improvements that implement and expand facilities for transit, bicycles, and walking help achieve the multimodal vision in the proposed Subarea Plan, advance the multimodal goals and policies in the Comprehensive Transportation Plan, and support and validate the trip generation adjustments applied to the land use alternatives. The effects of these improvements are not directly evident in the analysis of individual intersections, but are a considerable factor in adjusting the trip generation estimates to reflect multimodal travel. As such, the effects of transit, bicycle, and pedestrian improvements can be quantified as a reduction in automobile trips, and assessed qualitatively as to the degree the improvements serve the study area to support the anticipated mode shift in future developments.

The following sections describe transportation improvements planned by the City of Edmonds or other agencies that would foreseeably occur by the year 2035 under either the No Action Alternative or the Preferred Alternative.

PLANNED IMPROVEMENTS BY CITY AND OTHER AGENCIES

City of Edmonds

The analysis of year 2035 intersection level of service integrates transportation improvements planned by the City of Edmonds through the 2015 Comprehensive Transportation Plan, the six year Transportation Improvement Program, and recent safety studies to the extent the improvements affect intersection capacity and its ability to accommodate the projected growth in traffic.

Table 3.4.5 lists the planned transportation improvements that are relevant to the study area. They are organized with respect to the primary function of the improvement (e.g., Improve Bicycle Circulation Across and Parallel to SR 99 Corridor, Improve Transit Mobility and Transit Stop Environment).

Table 3.4.5 Planned Transportation Improvements (Near Term)

TYPE OF IMPVT	DESCRIPTION OF IMPROVEMENT
IMPROVE PEDESTRIAN SAFETY AND ACCESS TO/FROM SR 99 CORRIDOR	
Pedestrian and Vehicular Safety / Ped Circulation	Sidewalk construction: 216th St. SW from 72nd Ave. W to SR 99
	Sidewalk construction: 236th St. SW from Hwy. 99 to 76th Ave. W
	Sidewalk construction: 238th St. SW from Hwy. 99 to 76th Ave. W
	Complete street: 238th Street SW, between SR 104 and SR 99. Widen to three lanes with curb, gutter, bike lanes, and sidewalk
	Complete street: 228th Street SW, between SR 99 and 95th Pl. W Widen to three lanes with curb, gutter, bike lanes and sidewalk

TYPE OF IMPVT	DESCRIPTION OF IMPROVEMENT
IMPROVE BICYCLE CIRCULATION ACROSS AND PARALLEL TO SR 99 CORRIDOR	
Bicycle Circulation (Also see Figure 3.4.2)	<p>Bike lanes: 212th Street from Main Street to 68th Avenue crossing SR 99</p> <p>Bike route designation: 224th Street SW from 84th Avenue W across SR 99 to interurban trail</p> <p>Bike lanes: 228th Street SW from SR 104 across SR 99 to connect to existing bike lanes on 76th Avenue W. The road connection between SR 99 and 76th Avenue W (including bicycle lanes) was completed in 2016</p> <p>Bike lanes: 76th Avenue W from 208th to 220th and bike route designation to 224th Street SW</p> <p>Bike route designation: 238th Street SW from 84th Avenue W across SR 99 to existing bike lanes on 76th Avenue W</p> <p>Bike lanes: 84th Avenue W from 212th Street SW to 236th Street SW and bike route designation on 84th Avenue W south to 238th Street SW</p> <p>Bike lanes: 236th Street SW from SR 104 to 84th Avenue W</p> <p>Bike route designation: 80th Avenue W from 206th Street SW to 228th Street SW</p> <p>Bike route designation: 72nd Avenue W from 208th Street SW to 216th Street SW and continuing on 216th Street SW to SR 99</p> <p>Bike route designation: 73rd Pl W from 224th Street SW to 226th Pl SW</p>
IMPROVE TRAFFIC FLOW AND GENERAL SAFETY WITH ACCESS MANAGEMENT	
Traffic Safety / Access Management	<p>Install raised median (with potential gateway features) between 240th and 238th Streets</p> <p>Channelize westbound traffic on 240th for right turns only - allow U-turns at 238th</p> <p>Install raised median and limited c-curb on SR 99 between:</p> <ul style="list-style-type: none"> • 236th Street and 234th Street - restrict left turns from stop-controlled 236th Street • 234th Street and 230th Street - restrict left turns from stop-controlled 234th Street • 230th Street and 228th Street • 224th Street and 220th Street
IMPROVE TRANSIT MOBILITY AND TRANSIT STOP ENVIRONMENT	
Transit Service / Ped Amenities	<p>Priority Transit Corridor: SR 99 from 208th to SR 104</p> <p>Priority Transit Corridor: 228th Street SW from SR 104 to 76th Avenue W continuing to the Mountlake Terrace Transit Center. A new SWIFT station may be considered at SR 99 and 228th Street SW, but is not currently planned</p> <p><i>Community Transit anticipates expanding service to existing transit facilities along the 228th Street SW and Lakeview Drive corridors in coordination with the opening of the LINK light rail station at the Mountlake Terrace Transit Center in 2023.</i></p>
IMPROVE TRAFFIC FLOW WITH INTERSECTION CAPACITY PROJECTS	
Intersection Capacity / Vehicular Safety	<p>SR 99 and 212th Street SW: widen 212th to add a westbound left turn lane for 200-foot storage length and an eastbound left turn lane for 300-foot storage length - provide protected left turn phase for eastbound and westbound movements</p> <p>SR 99 and 220th Street SW: widen 220th to add a 325-foot westbound right turn lane and a 300-foot eastbound right turn lane - widen 220th to add a second westbound left turn lane</p> <p>SR 99 at 216th Street SW: widen to allow one left turn lane, one through lane and one right turn lane in eastbound and westbound directions, with 100-foot storage length for turn lanes - add</p>

TYPE OF IMPVT	DESCRIPTION OF IMPROVEMENT
	<p>eastbound right turn overlap with northbound protected left turn</p> <p>Signal Coordination on 220th St. SW from 76th Ave. W to SR 99</p> <p>Operational and safety strategies to help SR 99 traffic flow optimization include:</p> <ul style="list-style-type: none"> • Access management restricting turns from driveways at mid-block locations in coordination with U-turns at signalized intersections to maintain property access • Community transit is collaborating with local jurisdictions within the SR 99 SWIFT rapid transit corridor to implement adaptive traffic signals which can change signal timing in real time in response to changes in traffic demand and also improve transit priority detection

Sources: Edmonds 2015b; Edmonds 2015c; Edmonds 2016g; Edmonds 2017a; Edmonds 2017b.

PLANNED TRANSIT IMPROVEMENTS

Community Transit

Community Transit’s Transit Development Plan (2016-2021) includes service improvements to the Swift Blue Line serving the Highway 99 Corridor. Community Transit is extending Swift’s operation by an additional hour in the evening and adding six new evening buses (three in each direction). This service extension is planned to be implemented in early 2017.

Community Transit’s plans include service and route restructuring and new facilities within the 228th Street SW and Lakeview Drive Priority Transit Corridor in coordination with the opening of the LINK light rail station at the Mountlake Terrace Transit Center in 2023 (see planned improvements by Sound Transit).

Sound Transit

Sound Transit is extending its LINK light rail system to Lynnwood with one of the five new stations located at the Mountlake Terrace Transit Center. The extension is planned to be completed in the year 2023. Once completed, the Highway 99 Corridor Subarea will have access to a rail system connecting the City of Lynnwood to the Seattle-Tacoma International Airport through downtown Seattle. According to Sound Transit, traveling between downtown Seattle and the Mountlake Terrace station by LINK would take about 20 minutes.

SUBAREA PLAN IMPROVEMENTS

The proposed Subarea Plan includes pedestrian safety improvements intended to eliminate deficiencies and encourage walking and bicycling to, and across, the Highway 99 corridor from the surrounding neighborhoods, as well as to provide safe and attractive routes to transit stops on Highway 99. These subarea plan improvements indirectly reduce traffic impacts of the subarea by reducing automobile trip generation through the provision of infrastructure that encourage walking, bicycling and transit. Table 3.4.6 presents the list of near-term improvements in the proposed Subarea Plan that would address current concerns.

Table 3.4.6 Proposed Improvements (Near Term)

TYPE OF IMPVT	DESCRIPTION OF IMPROVEMENT
IMPROVE PEDESTRIAN SAFETY AND ACCESS TO/FROM SR 99 CORRIDOR	
Pedestrian Safety / Regionally Significant Transit Emphasis Corridor	<p>Improve sidewalks, sight distance visibility, street and safety lighting on 240th from 84th Ave W to 80th Way W (primarily along commercial frontages)</p> <p>Implement safety improvements at 224th Street SW and 76th Avenue W including constructing new or improving existing sidewalks on both sides of 224th approaching 76th Ave and SR 99.</p> <p>There is an identified need to widen the sidewalks on 228th Street SW east of SR 99. In the Summer of 2016 a number of pedestrian improvements were completed in this regionally significant multimodal corridor. Where narrow sidewalks still remain within the corridor or on connecting residential streets, the following pedestrian improvements may be considered in-lieu of widening sidewalks:</p> <ul style="list-style-type: none"> • Buffer pedestrians from moving traffic with street trees in tree wells constructed within parking lanes. • Consistent application of high visibility crosswalk markings at intersections. • Ensure street lighting illuminates entire width of street. Currently, street lights are located on one side of the street. Intersections with marked crosswalks should have safety lighting illuminating each end of crosswalks. • Install bus shelters at local bus stops with street lighting. Where right of way doesn't permit a shelter, use curb extensions to add width. <p>General need for safety and street lighting on residential streets surrounding SR 99, particularly pedestrian-scaled lighting.</p>
IMPROVE PEDESTRIAN ENVIRONMENT ALONG SR 99 CORRIDOR	
Pedestrian	Install pedestrian activated Rectangular Rapid Flashing Beacons (RRFB's) with high-visibility

TYPE OF IMPVT	DESCRIPTION OF IMPROVEMENT
Safety	<p>crosswalk markings at the pedestrian crossings of the SR 104 on and off-ramps and provide safety lighting to illuminate the crosswalks</p> <p>Implement corridor wide wayfinding signage to local districts and major multimodal facilities</p>
PROVIDE SAFE PEDESTRIAN CROSSING OF SR 99 AND ACCESS TO TRANSIT	
Access to / from Transit and Major Employment Center	<p>Improve connection between the Swedish Hospital Campus and the Swift Stations at 216th Street SW by implementing a pedestrian walkway system (potentially covered) internal to the campus with wayfinding to direct pedestrians to the various campus facilities including future land uses that support hospital expansion such as hotels and medical office buildings within the Health Care District.</p>
Access to/from Transit and Interurban Trail	<p>Provide pedestrian and bicycle links that connect the Interurban Trail to the SWIFT Stations and Community Transit bus stops serving the Health Care District. When the property on the east side of SR 99 between 216th Street SW and 220th Street SW redevelops, require the development to dedicate an easement connecting the trail to SR 99.</p>
Safe Pedestrian Crossing / Development Access / Access to Transit	<p>Concurrent with development at the 234th Street node, install a traffic signal with pedestrian crossings at 234th Street / Highway 99 which is the approximate mid-point of the corridor's large gap in crossings</p>
IMPROVE TRANSIT MOBILITY AND TRANSIT STOP ENVIRONMENT	
Access to Transit / Transit Stop Environment	<p>Improve local bus stops between 234th and 230th that serve Community Health Center and new development within the International and Gateway Districts</p> <p>Provide enhanced local transit stops near Swedish Hospital</p>
IMPROVE TRAFFIC FLOW AND GENERAL SAFETY WITH ACCESS MANAGEMENT	
Pedestrian and Vehicular Safety / Ped Circulation	<p>Safety improvements at the intersection of SR 99 / 224th Street SW and between 224th and 76th Avenues (particularly left turn access into Ranch 99 Market)</p>

Sources: DKS Associates 2017.

Appendix B contains a list of long-term planned improvements in the proposed Subarea Plan. Long-term is generally defined as beyond the current six year capital improvement cycle and likely beyond the timeframe of two consecutive capital improvement cycles.

IMPACTS COMMON TO BOTH ALTERNATIVES

Transportation demand increases under both alternatives. The change in demand differs between the alternatives and is described in the following sections.

IMPACTS OF THE PREFERRED ALTERNATIVE

TRAFFIC

Intersection Level of Service

The Preferred Alternative contains a substantially higher level of development and generates about 60% more traffic at build out than the No Action Alternative, even when adjustments for transit, active modes, pass-by and internal capture are taken into account. The City’s existing planned transportation improvements would be implemented under either alternative, including capacity-enhancing lane additions and reconfigurations at several intersections.

In addition to the existing planned transportation improvements, a number of pedestrian safety and transit improvements are proposed under the Preferred Alternative. These improvements encourage walking, bicycling and transit use—essential for achieving the desired change in mode share and justifying the trip generation adjustments. The quantitative effect of these improvements on intersection and roadway levels of service results from a reduction in automobile demand as opposed to an increase in capacity.

Table 3.4.9 presents the PM peak hour level of service at the study intersections at build out of the land uses in the Preferred Alternative and compares the findings with existing conditions and those for the No Action Alternative. For reference, the table also provides the City’s level of service standards.

In comparison to no action, there is increased delay under the Preferred Alternative at nearly all of the study intersections, but not uniformly. The intersections located in the northern half of the Highway 99 corridor (212th Street SW, 220th Street SW and 224th Street SW) have incrementally higher changes in delay between the alternatives. The change in delay at the intersection with 224th Street—which experiences the highest incremental increase in delay—is partly due to the constraints on the east-west

Table 3.4.9 Year 2035 Intersection Level of Service (PM Peak Hour) Under the Preferred Alternative

INTERSECTION	LOS STD	EXISTING CONDITIONS		NO ACTION ALTERNATIVE		PREFERRED ALTERNATIVE	
		Delay (Sec/Veh)	LOS	Delay (Sec/Veh)	LOS	Delay (Sec/Veh)	LOS
State Route 99 / 212th Street SW	E	49	D	88	F	96	F
State Route 99 / 216th Street SW	E	35	C	39	D	49	D
State Route 99 / 220th Street SW	E	51	D	79	E	86	F
State Route 99 / 224th Street SW	E	21	C	74	E	99	F

State Route 99 / 238th Street SW	E	16	B	53	D	62	E
State Route 99 / 244th Street SW	E [1]	45	D	66	E	73	E

[1] Intersections on SR 99 located south of SR 104 (Highways of Statewide Significance) do not have a Level of Service (LOS) standard. For the purposes of this EIS, the City of Edmonds is using LOS E on this segment of SR 99 to identify existing or potential future deficiencies.

Bold text signifies intersections that exceed the established level of service standard.

Source: DKS Associates 2017.

approaches (relatively narrow side streets and permitted signal phasing) and partly due to the increase in demand from growth under this alternative. The midway intersections experience some overlap in traffic generated by development in the north and south ends of the corridor. Three of the six study intersections operate at LOS F under this alternative with two of those changing from a LOS E under the No Action Alternative to a LOS F under the Preferred Alternative.

The levels of service at the Highway 99 intersections with 212th Street SW, 220th Street SW, and 224th Street SW exceed the City’s established standard for the Highway 99 corridor north of SR 104 and therefore are considered significant impacts.

Corridor Travel Time

Table 3.4.10 presents travel time, average speed and associated LOS for segments of the Highway 99 corridor at build out of the land uses in the Preferred Alternative and compares the findings with those for the No Action Alternative

. Based on average speeds and travel times, the overall peak direction of Highway 99 under the Preferred Alternative is southbound. Overall, the corridor operates at a LOS D in the PM peak hour in the northbound direction and a LOS E in the southbound direction. As stated earlier, this analysis is presented as information only since there are no adopted performance standards for corridor-wide travel time.

Table 3.4.10 Year 2035 SR 99 Corridor Travel Time and Level of Service (PM Peak Hour) Under the Preferred Alternative

ROADWAY SEGMENT	NO ACTION ALTERNATIVE			PREFERRED ALTERNATIVE		
	Travel Time (Min)	Speed (Mph)	LOS	Travel Time (Min)	Speed (Mph)	LOS
State Route 99 Northbound						
Segment 1: 224th St SW to 212th St SW	3.1	27	C	3.6	23	C
Segment 2: 244th St SW to 224th St SW	3.6	14	E	3.9	13	F

Overall Corridor 244th St SW to 212th St SW	6.7	20	D	7.5	18	D
State Route 99 Southbound						
Segment 1: 212th St SW to 224th St SW	4.8	10	F	5.6	9	F
Segment 2: 224th St SW to 244th St SW	3.6	23	C	4.0	21	D
Overall Corridor 212th St SW to 244th St SW	8.4	16	E	9.6	14	E
Urban Street Characteristics		LOS	Average Travel Speed (MPH)			
Urban Street Class	II	A	>	37		
Range of Free Flow Speeds (FFS)	34 - 44 MPH	B	>	29	to	37
Typical FFS	40 MPH	C	>	21	to	29
FFS for Highway 99	45 MPH	D	>	16	to	21
		E	>	13	to	16
		F	≤	13		

Source: Transportation Research Board 2000, Chapter 15 Urban Streets; DKS Associates 2017.

Appendix F contains the intersection and roadway level of service calculation worksheets for the Preferred Alternative.

TRANSIT

The existing planned transportation improvements are supportive of pedestrian, bicycle and transit infrastructure and also support policy direction in the proposed Subarea Plan to maximize the existing transit system and the expanded system in the next 10 years. The near-term and long-term improvements called for in the proposed Subarea Plan would further support transit service and transit-oriented development, addressing most of the current critical deficiencies with respect to safely accessing the Highway 99 corridor and its transit facilities.

Implementation of the near-term transit-supportive improvements in the proposed Subarea Plan concurrent with new development will help to ensure accessibility to transit as growth occurs over time, and will also indirectly help to minimize traffic impacts.

PEDESTRIAN AND BICYCLE

As development occurs under the Preferred Alternative, the demand to access transit, regional multimodal facilities and other nodes of development would increase. Implementation of the pedestrian- and bicycle-supportive infrastructure called for in the proposed Subarea Plan concurrent with new development would help to achieve the vision and goals of the plan. Transit-oriented, transit-adjacent, and transit-supportive development is most successful when served by multimodal connections.

3.4.2 MITIGATION MEASURES

INTRODUCTION AND RECOMMENDED APPROACH TO MITIGATING IMPACTS

This section describes mitigation measures to address impacts under the proposed alternative. It is important to note that the traffic, transit, and active mode impacts identified in the previous section are based on build out of the 2035 growth targets for each of the alternatives. The growth targets would likely be achieved gradually over time, rather than suddenly in the near-term.

The recommended measures in this section include the supportive improvements that help form the multimodal transportation system that complements the proposed Subarea Plan's land use density, diversity, and urban design to achieve the travel benefits of substantially reduced automobile trip generation. These measures are addressed qualitatively in the impacts section since the City of Edmonds has not established standards to indicate when such measures need to be implemented.

The recommended measures also include physical capacity increases at the intersections shown to exceed LOS standards at buildout of the alternatives. There are reasons why the capacity improvements should not be implemented immediately; rather, the impacted intersections should remain in their current configuration until monitoring indicates that the intersection is approaching failure, while still conforming to concurrency requirements. The reasons for waiting before implementing capacity increasing measures include:

- **Secondary impacts.** Adding capacity to intersections is typically done through the addition of vehicular travel lanes requiring widening the intersection approaches. Widening intersections for vehicular capacity often results in secondary impacts to pedestrians, bicyclists, transit, and adjacent land owners. Wider streets increase the crossing distance for pedestrians which translates to longer exposure to potential vehicular conflicts. Wider streets increase the minimum green times for pedestrian crossings and bicycle clearance intervals, potentially increasing the intersection's cycle length and increasing delay overall as a result. Adjacent land owners may be required to avoid building on the portions of their property where widening for mitigation might occur. The study area will benefit if these secondary impacts can be avoided by monitoring conditions until the mitigation measures are clearly necessary.
- **Integrated land use and transportation systems need time to mature.** The transportation benefits of planned development and multimodal transportation strategies will not be evident for years. Development needs to reach a certain critical mass; trip reduction strategies require cycles of implementation, monitoring, and refinement before reaching goals; and the residents and employees of the study area need time to acclimate to a changing environment and develop their own strategies for changing travel behavior. For these reasons, it is important to wait for the system to mature.
- **Implement less impactful measures and monitor their effectiveness.** Transportation Demand Management and Parking Demand Management strategies can be very effective if the programs are managed correctly, vigorously promoted, and constantly refined and improved. A

Transportation Management Association, managed by professionals taking direction from the study area's stakeholders could be used in the near-term to maximize the return on investment in multimodal infrastructure.

Rather than construct the capacity increasing mitigation measures immediately or in the first few years after adoption of the proposed Subarea Plan, a staged approach of monitoring and instituting demand management programs as interim mitigation measures may determine the capacity increasing measures are not required over time, or it may delay constructing the capacity increases to a point in time where the change has less impact.

The capacity enhancing mitigation measures described in this section are proposed to be implemented when the operating conditions of an intersection identified as impacted in this EIS reaches a threshold that indicates the intersection will exceed the established LOS standard in the near future.

INCORPORATED PLAN FEATURES

The City of Edmond's existing planned transportation improvements will help to mitigate for traffic impacts. The near-term and long-term transportation improvements in the Subarea Plan will contribute to the underlying infrastructure that creates transit, pedestrian, and bicycle-friendly places and will indirectly help to mitigate for traffic impacts.

REGULATIONS AND COMMITMENTS

Near-term and long-term transportation improvements identified in the proposed Subarea Plan will be incorporated into the Comprehensive Transportation Plan's capital improvement projects. The current Comprehensive Transportation Plan process (updating the Plan in a cycle approximately every six years) will be the mechanism for monitoring the LOS at impacted intersections.

The City's current six year Transportation Improvement Program will be used to prioritize projects and identifying funding. Flexibility will be built into each cycle of this program to modify the priority and funding of the capital projects serving the study area as new development occurs and creates opportunities for matching funds from private development; redirecting project priorities and timing to coincide with major developments.

The City will leverage the proposed Subarea Plan and Planned Action Ordinance to request early distribution of state funds (\$10,000,000) earmarked for Highway 99 within Edmonds in the State's Ten Year Transportation Investment Plan. Additionally, the City will continue to compete for funding from state and federal grants and continue to watch for potential new funding sources.

OTHER MITIGATION MEASURES

The EIS analysis indicates that mitigation for traffic impacts of improvement projects under the Planned Action would occur in two stages.

STAGE 1

The City will work with Community Transit to identify and help implement Transportation Demand Management (TDM) mitigation measures to potentially reduce intersection level of service impacts under the No Action and Preferred Alternatives. The City may also consult with Sound Transit and the Washington State Department of Transportation on this subject.

Residential (any size), commercial (under 25 employees), and mixed-use developments may select from a menu of TDM measures specifically assembled for these types of land uses. The City will work with Community Transit and, if appropriate, other agencies, to develop guidelines and worksheets for property owners or tenants of new developments to formulate a trip reduction plan, provided that where the proposed development already incorporates measures that encourage vehicle trip reduction or transportation demand as part of its proposal. Where specific trip reductions plans are required, plans must be submitted to the Development Services Department prior of building permit application unless a different schedule has been approved by the Development Services Director. The Department will consult with Community Transit on the commute trip reduction plans and recommend any changes..

Developments comprised of larger employers are required to develop and implement TDM plans tailored to their workforce. Employers with 25 to 100 employees are required to develop a TDM plan selecting from the menu of TDM measures described above, or customize their own plan. TDM plans for employers with 100 employees or more must conform to the requirements of the Commute Trip Reduction (CTR) law that is part of the Washington Clean Air Act (RCW 70.94).

Menus of TDM strategies should include tiers of measures that have varying levels of effectiveness and cost including but not limited to measures within the following broad categories and associated example measures:

- Financial incentives, amenities and perks:
 - Fully or partially subsidized transit passes
 - Carpool/vanpool subsidies such as fuel vouchers, provision of vehicles, full or partial coverage of vehicle lease, fuel, insurance and maintenance
 - Car share membership for use by registered carpool and transit commuters
 - Emergency ride home program
 - Company vehicle available for employees who commute by alternative modes
 - Prize drawings to employees or residents who commute by alternative modes
 - Subsidized off-site services such as fitness center, daycare, dry cleaning, bicycle repair and maintenance, etc.
 - Service provided, or delivered, on-site such as dry cleaning pickup and delivery, ATM machine, fitness center, daycare, etc.
- Parking Management Strategies
 - Charge market rate for employee parking
 - Parking cashout program
 - Preferential parking for carpool/vanpools
 - Restrictions or limited on-site parking

- Unbundled parking
- On-site bike share and/or car share facilities
- Support Strategies and Assistance
 - Part or full-time on-site TDM coordinator
 - Commute options package for new employees and/or residents
 - Commute alternative information kiosk or website
 - Rideshare matching program
 - Discounts on purchasing bicycles and accessories
 - Sponsored events promoting alternative commute options

Note: Except where required by law or as a condition of approval, monitoring, refinement, and maintenance of individual TDM plans by new development is voluntary after the initial submittal for plan approval.

STAGE 2

The City will implement new capacity-enhancing mitigation measures for intersection impacts under the Preferred Alternative. The following new intersection capacity-enhancing mitigation measures will be incorporated into the City's standardized six-year Transportation Improvement Program process for funding and prioritizing transportation projects:

- State Route 99 / 220th Street SW – Widen State Route 99 to add a second southbound left turn lane. This intersection is projected to operate at LOS F under buildout of the Preferred Alternative, exceeding the standard of LOS E even with implementation of the improvement called for in the 2015 Comprehensive Transportation Plan to widen 220th to add a westbound right turn lane and a second westbound left turn lane, and an eastbound right turn lane.
- State Route 99 / 224th Street SW – Convert the eastbound approach of 224th Street SW to provide an exclusive right turn lane, a shared through/right turn lane, and an exclusive left turn lane. This intersection would operate at a LOS F under buildout of the Preferred Alternative. This intersection was not studied in the 2015 update to the Comprehensive Transportation Plan and, therefore, does not currently have any planned improvements.

Additionally, the City will take steps to enable the new capacity-enhancing mitigation measures when and if monitoring shows that the measures are required, and implement the improvements, as the following opportunities arise:

- Require any new development, redevelopment or site improvements requiring a building permit on the properties adjacent to the impacted intersections to not construct any form of structure or infrastructure (except landscaping or other streetscape improvements) on, under, or above the right of way potentially needed to be acquired for the intersection capacity improvements.

- Coordinate with WSDOT and adjacent municipalities on the potential land acquisitions needed for the intersection capacity improvements located within their jurisdictions and, if possible, request the adjacent municipalities to apply the same building restrictions.
- As funds become available through the City’s Transportation Improvement Program process, construct the capacity improvements. This may include acquiring the necessary right of way from adjacent property owners through purchase or negotiated dedication.

Table 3.4.11 Comparison of Intersection Level of Service (PM Peak Hour) With and Without Proposed New Capacity-Enhancing Mitigation Measures

INTERSECTION	WITHOUT MITIGATION	WITH MITIGATION
	LOS	LOS
State Route 99 / 212th Street SW	Mitigation Measure: No feasible mitigation beyond what is currently planned.	
Preferred Alternative	F	Not Applicable
No Action Alternative	F	Not Applicable
State Route 99 / 216th Street SW	Mitigation Measure: None Required	
Preferred Alternative	D	Not Applicable
No Action Alternative	D	Not Applicable
State Route 99 / 220th Street SW [1]	Mitigation Measure: Add second left turn lane to northbound approach of intersection.	
Preferred Alternative	F	E
No Action Alternative	E	Not Applicable
State Route 99 / 224th Street SW	Mitigation Measure: Convert eastbound approach to an exclusive right turn lane, a shared through/right turn lane, and an exclusive left turn lane.	
Preferred Alternative	F	E
No Action Alternative	E	Not Applicable
State Route 99 / 238th Street SW	Mitigation Measure: None Required	
Preferred Alternative	E	Not Applicable
No Action Alternative	D	Not Applicable
State Route 99 / 244th Street SW	Mitigation Measure: None Required	
Preferred Alternative	E	Not Applicable
No Action Alternative	E	Not Applicable

[1] Planned improvements under baseline conditions include dual left turn lanes southbound and westbound at Highway 99/220th Street SW.

Source: DKS Associates 2017.

TRANSIT

No significant negative impacts were identified under either alternative to transit. As such, there are no transit-related mitigation measures.

PEDESTRIAN AND BICYCLE TRANSPORTATION

No significant negative impacts were identified under either alternative to pedestrian and bicycle modes of transportation. As such, there are no mitigation measures for pedestrian and bicycle modes of transportation.

3.4.3 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The traffic impact to the intersection of State Route 99 and 212th Street SW is considered a significant unavoidable adverse impact under both alternatives. This intersection operates at a LOS F under buildout of both the No Action Alternative and the Preferred Alternative. The LOS exceeds the level of service standard of E even with implementation of the planned improvements for this intersection called for in the 2015 update of the Comprehensive Transportation Plan, which include widening 212th to add a westbound and eastbound left turn lane and providing protected left turn phasing for the eastbound and westbound movements.

To mitigate the impacts of both the No Action Alternative and the Preferred Alternative on this intersection would require widening State Route 99 to add a second northbound and southbound left turn lane, in addition to the improvements already planned in the Comprehensive Transportation Plan. This is not feasible because a proposed development project located on the southwest corner of the intersection is in the process of finalizing its site plan with the City, and the site plan places infrastructure within the right of way that would need to be acquired to implement the mitigation measure. It is anticipated the proposed development will remain in place for the duration of the 20-year Subarea Plan timeframe. As a result, the impact at State Route 99 and 212th Street SW is considered a significant unavoidable adverse impact under either alternative.

SECTION 3.5 PUBLIC SERVICES AND UTILITIES

3.5.1 IMPACTS

Under both alternatives, population density and average building heights are expected to increase in various amounts and locations in the study area, construction and redevelopment is expected to occur, and transportation improvements are planned.

IMPACTS COMMON TO BOTH ALTERNATIVES

POLICE

Growth under both alternatives would result in an incremental increase in calls for police service. Increased retail and office establishments could result in increased crimes of shoplifting and fraud at a rate similar to other city retail businesses. In order to maintain the current ratio of commissioned officers to residents, an increment of additional officers would need to be added as the population increases. Additional law enforcement services would not be needed immediately, but would be added incrementally as development occurs, first by shifting duties between existing officers and ultimately by adding personnel. See the discussion of impacts under both alternatives.

Construction activity under both alternatives may also affect demand for police services. Service calls to the Edmonds Police Department could increase during construction due to site theft and vandalism. Existing Department staff and equipment are anticipated to be sufficient to handle the potential increase in service demand from construction activities (Lawless pers. comm.).

FIRE AND EMERGENCY MEDICAL SERVICES

As discussed above, call load in the region has increased significantly over the past two years for the District and surrounding departments (Fire District 2015b, 26). Under both alternatives, growth and development in the study area would create more demand for fire and emergency medical services and place additional pressure on Fire District 1 to meet response time standards. The District would attempt to maintain response times consistent with or better than current performance levels as the demand for

service increases. Over time, additional staffing and equipment may be required in order to maintain performance levels. Emergency medical services typically generate the highest demand for Fire District 1.

Growth and development are expected to occur incrementally as individual development projects are constructed and the associated impacts are expected to occur incrementally as well. This would allow time for the District and City to address future needs for fire and emergency medical services in the study area through planned personnel, apparatus, and facility improvements. In addition, property values in the study area would likely increase as growth and development occur. Increased tax revenues from greater retail activity and increases in property values could offset some of the additional costs to Fire District 1 and the City of Edmonds for improvements needed to meet additional service needs.

Increased building heights will impact the amount of additional staffing and equipment needed to support increased fire and emergency medical service demands (Zweber pers. comm.). Under Alternative 1 (No Action), it is assumed that future development would likely continue the pattern of relatively low scale and low intensity auto-oriented commercial uses; most existing buildings are significantly shorter than the allowed maximum building heights of 60 to 75 feet and it is assumed that future development would continue this pattern (see Chapter 2 and Chapter 3.3). The anticipated lower buildings heights and densities under the No Action Alternative would necessitate fewer ladder trucks and other equipment than the Alternative 2. Building heights are expected to increase in the study area under Alternative 2, with the greatest intensities reaching the allowed maximum heights of 60 to 75 feet, thus increasing the potential for emergencies requiring a ladder truck. The existing ladder truck at Station 20 (closest to the study area) is equipped to provide services to buildings of the heights proposed under both alternatives. In addition, fire related safety features in any new multi-story buildings, such as automatic sprinkler systems and fire-resistant construction, would slow the spread of fire and provide more time for firefighters to extinguish a fire before it spreads to adjacent properties. This time would allow other fire stations to respond, thereby avoiding the need to increase staffing at any of the Edmonds stations.

Increased construction activities could also result in an increase in demand for fire and emergency medical services because the District makes service calls related to inspection of construction projects and responds to construction-related accidents. Existing personnel and equipment are anticipated to be sufficient to handle increased service needed for construction activities.

Changes in population demographics may also impact the amount of additional staffing and equipment needed to support increased fire and emergency medical service demands – multi-story senior housing, for example, would likely require more personnel than office development (Zweber pers. comm.). Monitoring and regularly reviewing the demographic trends of future growth in the study area would allow the City and Fire District 1 to determine if/when additional personnel, equipment, or facilities are needed to accommodate any demographic shifts.

Future traffic growth under both alternatives may impact the response time of emergency vehicles as Fire District 1 is dependent upon the capability of the city's street network to handle traffic flows. Changes to the street network have the potential to impact the mobility of fire and emergency response

vehicles. The Department of Fire Prevention reviews proposed street improvements on a project-by-project basis to identify potential negative impacts on response times and ensure street improvements are consistent with the City’s Fire Code.

SCHOOLS

There is sufficient capacity district-wide to accommodate the additional school aged children under both alternatives. The District projects additional capacity for 2,201 elementary students (K-6), 859 middle school students (7-8), and 1,319 high school students (9-12) in 2036 (see the capacity discussion under affected environment and Table 3.5.6; ESD 2016, 20).

The District could experience slightly greater growth in enrollment than projected by forecast models as a result of Alternative 2, which calls for 3,325 new housing units, compared with 1,224 housing units under the No Action Alternative. However, multifamily housing units have lower rates of children than single-family homes. The expected increase in school aged children is about 645 students more for Alternative 2, compared to the No Action Alternative. Projected 2036 capacity is sufficient to accommodate the additional school aged children under Alternative 2, regardless of grade level.

The expected increase in school aged children under Alternative 2 would likely be spread across all grades. Though it is unlikely that all of these students would be within the same grade span (either all elementary, middle, or high school age), projected 2036 capacity under each grade span is enough to accommodate the expected increase of 645 school aged children in their entirety.

PARKS AND OPEN SPACE

The City’s 2014 *Parks, Recreation, and Open Space Plan* establishes an adopted LOS standard of 11.45 acres per 1,000 residents. Assuming approximately two residents per new housing unit, total system LOS under both alternatives would be above this standard if no new acreage were added. To maintain the existing total system LOS of 14.08 acres per 1,000 residents (above the adopted standard), approximately 44 or 103 acres of park land, depending on the alternative, would need to be added incrementally by 2035 as the population increases (see Table 3.5.9).

TABLE 3.5.1 Total System Level of Service under Both Alternatives, Acres per 1,000 Population

	IMPACT ON ADOPTED TOTAL SYSTEM LOS		IMPACT ON EXISTING TOTAL SYSTEM LOS	
	Acreage	Total System Los (Acres/1,000)	Acreage (Change From Existing)	Total System Los (Acres/1,000)
Existing	560.70	14.08	560.70	14.08
No Action Alternative <i>1,224 New Housing Units by 2035</i>	560.70	13.06	604.57 (+43.87)	14.08
Alternative 2 Preferred Alternative <i>3,325 New Housing Units by 2035</i>	560.70	11.89	663.73 (+103.03)	14.08

Note: calculations assume approximately two residents per new housing unit. Based on existing April 2015 population of 40,490. Source: Edmonds 2014.

As discussed above, there is an existing identified need to address gaps in park service in most of the study area (Hite pers. comm.). Expected growth and development in the study area under both alternatives will likely result in increased demand for additional access to park and recreation facilities, further exacerbating the existing gaps in service (see gaps identified in Figure 3.5.7). Residential growth would result in additional demand for parks and recreational facilities during the weekday and weekend periods. Employment growth would also result in greater demand for park facilities, particularly before and after work and during the lunch hour. Park use would also increase outside of the study area, particularly at facilities located within one-half mile of the study area (see Table 3.5.7 and Figure 3.5.6)

While the geographic access deficiencies outlined above do not differ from one alternative to the other, there are differences between the alternatives in terms of the distribution of development, and ease of access for future residents to get to open space.

ELECTRICITY

Development under both alternatives could increase electrical loads in the study area, with the greater increase in future housing and job growth under Alternative 2 (Preferred Alternative) likely resulting in a greater increase in loads than the No Action Alternative. Given existing load capacity, it may be challenging to back up these new loads, especially during the summer (Hayslip pers. comm.). During the summer, dense commercial areas often peak, whereas residential loading drops, when temperatures are high and the system capacity is derated. Both commercial and residential loadings peak in the winter, but the capacity ratings of the system are greater (Ha pers. comm.).

The existing Snohomish County PUD No. 1 system may need improvements or reconfiguration to meet future growth needs throughout the study area under both alternatives, particularly if unusually high power uses are developed. An example of a high power user would be the data center for an internet service provider or medical services requiring uninterrupted power supply. Potential upgrades could range in scope from local service improvement up to and including new substation and transmission facilities. Impacts to the system would be mitigated through existing agency planning processes and new customers served as the development occurs, on a case-by-case basis. A feasibility study may be required depending on the level of development and associated new loads (Hayslip pers. comm.).

Power in part of or all of the study area may be undergrounded depending on the availability of funding and the extent of redevelopment or new development (ECDC 18.05.010; Hayslip pers. comm.).

STORMWATER

Any new development or redevelopment will result in changes to the hydraulic regime of the stormwater flows in the study area. However, the study area is mostly built out so development under both alternatives would likely not increase the amount of impervious

Hydraulic regime includes the rates, volume, and pattern of flow of stormwater.

surface area. Stormwater volumes would likely be managed in the same manner as they are today (Cawrse pers. comm.). In addition, regulations governing stormwater requirements for development have become significantly more comprehensive since much of the study area was developed; under both alternatives, any redevelopment or new development would be subject to these stricter regulations and may thus improve water quality (Edmonds 2010a, 1; Cawrse pers. comm.).

The City currently has a well-developed permitting process that requires plan review and site inspections for new development and redevelopment projects. Edmonds Community Development Code (ECDC) Chapter 18.30 identifies minimum technical stormwater requirements for development, and the *Storm Water Code Supplement to Edmonds Community Development Code Chapter 18.30* (the Supplement) was adopted to implement the applicable requirements listed in City Code Section 18.30. The City is nearly finished updating the Stormwater Code and Supplement, anticipated to be adopted January 1, 2017, which will require the use of low impact development (LID) techniques for stormwater management (unless infeasible; Cawrse pers. comm.).¹

Low impact development (LID) is a set of stormwater management and land development strategies applied at the parcel and subdivision scale that seek to minimize or completely prevent alterations to the natural hydrology of the site. LID includes site planning and design to reduce alterations of natural soil and vegetation cover, minimize impervious surfaces, and specific practices that help to replicate natural hydrology such as permeable pavements, green roofs, soil amendments, bioretention systems, and dispersion of runoff.

Specific permit requirements for redevelopment and new development are listed in the Supplement and portions of the *Stormwater Management Manual for Western Washington* (as identified in the Supplement; Ecology 2014) – examples include LID techniques, pollutant control, preservation and maintenance of natural drainage patterns, runoff treatment and flow control BMPs, and construction stormwater pollution prevention plans (Edmonds 2010b). Projects that drain to Lake Ballinger which require water quality measures are required to provide phosphorous treatment (Cawrse pers. comm.).

The anticipated effects of the Proposal on the Lake Ballinger watershed would be improvements in hydrologic characteristics and water quality because of the increased regulations governing stormwater requirements since existing development occurred.

IMPACTS OF ALTERNATIVE 2 PREFERRED ALTERNATIVE

Alternative 2 (Preferred Alternative) is expected to include more growth by 2035 than the No Action Alternative (3,325 new housing units and 3,013 new jobs under Alternative 2).

¹ The City currently strongly encourages the implementation of low impact development (LID) techniques whenever feasible, but will not begin requiring their use until the updated Stormwater Code is adopted.

Impacts to fire and emergency medical service, schools, and electricity would be similar under Alternative 2 to those described under Impacts Common to Both Alternatives. Police, parks and open space, and stormwater are further discussed below.

POLICE

Under Alternative 2 (Preferred Alternative), future development would result in the expected addition of 3,325 new dwelling units and 3,013 new jobs, compared with 1,224 new housing units and 2,317 new jobs under the No Action Alternative. The potential increase in residential and employment density that could occur under Alternative 2 would result in a more consistent and increased level of activity in the study area. A well-used street can both increase public safety and calls for service. Expected growth in population and employment associated with development would be incremental and would result in associated incremental increases in demand for police services. Increased retail and office establishments may result in increased crimes of shoplifting and fraud at a rate similar to other city retail businesses.

Greater increases in vehicular, pedestrian, and bicycle traffic under Alternative 2 may also result in the need for additional traffic enforcement.

In order to maintain the current level of service, approximately 10.2 police officers and 1.5-2 police staff assistants would need to be added incrementally by 2035 as the population increases (Lawless pers. comm.). This estimate assumes approximately two residents per new housing unit, accounts for the increased transient population from job growth, and is based on the average number of incidents handled by patrol officer over the past five years (see Table 3.5.10).

EPD's 2016-2021 *Multiyear Strategic Plan* recommends the Department should, at a minimum, strive to maintain its current staffing ratio of 1.35 commissioned officers per 1,000 residents (EPD 2016b, 22-23). The ratio of commissioned police officers per 1,000 residents would increase slightly to 1.38 with the addition of 10.2 commissioned police officers (EPD 2016b, 6, 25).²

PARKS AND OPEN SPACE

Future development under Alternative 2 (Preferred Alternative) would result in the addition of 3,325 new dwelling units – the greater increase of the two alternatives – likely resulting in the greatest increase in demand for park and recreation facilities overall. Because of the focus on residential development under Alternative 2, demand would be most pronounced during the weekday and weekend periods.

The City's 2014 *Parks, Recreation, and Open Space Plan* establishes an adopted LOS standard of 11.45 acres per 1,000 residents. Assuming approximately two residents per new housing unit, total system LOS

² Based on the April 2015 existing population of 40,490, 55 existing commissioned officers, and approximately two residents per new housing unit.

under Alternative 2 would be 11.89 acres per 1,000 residents if no new acreage were added (above the adopted standard). To maintain the existing total system LOS of 14.08 acres per 1,000 residents, approximately 103.0 additional acres of park land would need to be added incrementally by 2035 as the population increases (see Table 3.5.9).

Proposed transportation projects under Alternative 2 would improve pedestrian and bicycle character, access, and mobility within the study area, particularly crossing Highway 99. As such, east-west access across Highway 99 to park and recreation facilities would improve.

STORMWATER

Under Alternative 2 (Preferred Alternative), the amount of stormwater runoff is expected to decrease. Redevelopment at higher densities – with a focus on residential development and pedestrian amenities – would result in a reduction of impervious surfaces if new landscaping and open space areas are incorporated into the redevelopment projects, as required by the City code and stormwater regulations. For example, the conversion of a large surface parking lot to higher density mixed-use development would result in increased intensity and quantity of development, but would likely result in a decrease in impervious surfaces and increase in stormwater facilities (especially those which improve water quality, such as LID features).

3.5.2 MITIGATION MEASURES

INCORPORATED PLAN FEATURES

Proposed transportation projects under the sub-area plan would improve pedestrian and bicycle character, access, and mobility within the study area, particularly crossing Highway 99. As such, east-west access across Highway 99 to park and recreation facilities would improve.

The sub-area plan provides greater incentive for mixed-use and commercial development in proximity to existing infrastructure on SR-99, making more efficient use of available stormwater capacity. Additionally, planned streetscape improvements under the Action Alternative would increase landscaping along the street – trees and other landscaping provide a natural ability to absorb stormwater and release it slowly to the atmosphere.

The City will continue to pursue energy efficiency measures to reduce energy consumption, thereby reducing stress on Snohomish County PUD as residential and jobs growth occurs. The sub-area plan encourages sustainable building practices, including considering requiring electric vehicle charging facilities and encouraging solar panels (*Recommendation 2.2 and 2.3, February 2017 Draft Highway 99 Subarea Plan*).

REGULATIONS AND COMMITMENTS

POLICE

The Police Department will implement the 2016 agency goals to the extent feasible in its 2016-2021 *Multiyear Strategic Plan*. These goals include:

- bringing the Street Crimes Unit and second K-9 team back on line
- partnering with City Council and the Edmonds School District to secure funding for a School Resource Officer for Edmonds-Woodway High School
- establishing by policy the Peer Support Team to assist Department members and their families in time of need
- working with SNOCOM and Bair Analytics to secure a crime analysis workstation which interfaces with records management and helps bring a public crime mapping portal on-line

As recommended in the 2016-2021 *Multiyear Strategic Plan*, the Police Department should maintain, at a minimum, the current staffing ratio of 1.35 commissioned officers per 1,000 residents. Additionally, the Police Department should continue looking to future budget cycles and preparing to pursue and justify the addition of commissioned staff as the economic climate allows.

As recommended in the 2016-2021 *Multiyear Strategic Plan*, the Police Department should restore the Crime Prevention Officer position to aid the Department's ability to conduct crime prevention training and strategies for businesses, apartment management, various concerned groups, and individuals.

FIRE AND EMERGENCY MEDICAL SERVICES (EMS)

Ongoing capital facilities improvement, budgeting, and operational planning by Fire District 1 and the City of Edmonds are anticipated to address incremental increases and other changes in demand for fire services, including the need for additional personnel, additional apparatus, and facility improvements. Fire District 1 recently completed the first Phase of a Capital Facilities Plan which evaluates existing conditions, including an inventory and assessment of existing facilities. Phase 1 of the plan indicated a need for minor near and mid-term maintenance and repairs at Stations 16 and 17, as well as potential seismic or safety upgrades. Station 20 is identified as one of 5-6 stations throughout the district which should be considered for replacement to support operation needs and code deficiencies (Fire District 2016c, 46, 48, C114-C145). Phase 2 will forecast future needs and phase 3 will provide an estimate of capital facility funding necessary to execute the plan, an implementation timeline and a recommended funding approach.

All potential development in the study area will be constructed in compliance with the City's current Fire Code (ECDC 19.25), which is comprised of the 2015 International Fire Code with Edmonds Amendments. Adequate fire flow to serve potential development will be provided as required by the Fire Code. Potential development will also be required to comply with code requirements for emergency access to structures. The Department of Fire Prevention also reviews proposed street improvements on a project-by-project basis to identify potential negative impacts on response times and ensure street improvements are consistent with the City's Fire Code.

A portion of the tax revenue generated from potential redevelopment in the study area would accrue to the City and Fire District 1 to help fund additional fire and emergency medical services.

SCHOOLS

Ongoing capital facilities improvements, budgeting, and operational planning by the District, in conjunction with the City of Edmonds, are anticipated to accommodate projected student enrollment at acceptable levels of service over the next twenty years.

The School District will continue to replace, expand, modernize, and upgrade District facilities as approved by voters in the 2014 Capital Construction Bond and should implement the goals identified in Edmonds School District's Strategic Direction (ESD 2014).

PARKS AND OPEN SPACE

The City will, to the extent feasible, implement goals identified in the 2014 *Parks, Recreation, and Open Space Plan* which improve the park system within or near the study area to address geographic gaps in service (Edmonds 2014, 4-1 – 4-11). Specifically, impacts identified in the EIS should be mitigated by:

- Expanding the partnership with the Edmonds School District, including negotiating an agreement for expanded, year-round public use of school grounds, sports fields and gyms for recreation purposes (Goal 1.A).
- Exploring property acquisition and development with partners, including the School District, Snohomish County and other public and private entities – continue to partner with neighboring and overlapping jurisdictions (cities, counties, school districts) as well as private entities (i.e. churches) to expand recreation opportunities for the community; continue discussions for possible acquisition of Esperance Park from Snohomish County for annexation and redevelopment into a community park with sports fields, community gardens, picnic shelters, and other recreation features; and consider acquisition of County park land within or adjacent to Edmonds (if made available), such as Chase Lake (Goal 2.C).
- Acquiring park land in the Highway 99/SR 104 areas to provide adequate park service in redeveloping areas. Create new civic spaces to enhance investment and revitalization while meeting recreation needs, especially where service gaps exist, or higher residential impact is planned (Goal 2.G).
- Defining the best routes for and treatments to create central north-south and east-west pedestrian and bicycle corridors, incorporate these into the City's transportation plans, and implement improvements (Goal 2.N).
- Increasing connections to the Interurban Trail, using signage, sidewalks, curb extensions, and other pedestrian/bicycle enhancements, especially focusing on crossing Highway 99 (Goal 2.O).
- Strongly considering the formation of a Metropolitan Park District in order to sustain the level of quality expected by the community while growing to meet future needs (Edmonds 2014, 5-5).

ELECTRICITY

Ongoing capital facilities improvements, budgeting, and operational planning by Snohomish County PUD are anticipated to address incremental increases and other changes in demand for electricity. Depending on the level of development and associated new loads, feasibility studies should be conducted for individual projects as part of the development review process. System capital projects should be developed to meet the demands of future loading if capacity improvements are necessary (Harpers.com).

STORMWATER

Any redevelopment or new development under both alternatives would be subject to today's stricter regulations governing stormwater. Green design and construction methods should be employed in buildings, streetscapes, and drainage features to detain and treat stormwater (Ecology 2014, 8-10).

The City's *Storm and Surface Water Management Comprehensive Plan (2010)* will guide infrastructure improvements. Specific elements of the stormwater improvements will be defined by the requirements of the State-mandated *NPDES Western Washington Phase II Municipal Stormwater Permit*. Under this set of regulations, the City maintains measures to protect and improve runoff conditions in relation to the receiving waters. The City of Edmond's stormwater management requirements and ongoing efforts are included in:

- Edmonds Community Development Code 18.30 and Stormwater Code Supplement to 18.30 (Edmonds 2010b; Edmonds 2016c) – the City is nearly finished updating the Stormwater Code and Supplement, anticipated to be adopted January 1, 2017 (Cawrsepers.com)
- Storm and Surface Water Management Comprehensive Plan (Edmonds 2010a)
- Stormwater Management Program Plan (Edmonds 2016f)

OTHER MITIGATION MEASURES

POLICE

The City will monitor growth and demand for police services in the study area in order to determine if/when additional personnel are needed and will regularly review trends to ensure the Police Department has enough advance time to address the needs.

New development under the Planned Action will employ Crime Prevention through Environmental Design (CPTED) techniques - incorporation of design features into development that would help reduce criminal activity and calls for service, including orienting buildings toward the sidewalk and public spaces, providing connections between buildings, and providing adequate lighting and visibility.

FIRE AND EMERGENCY MEDICAL SERVICES (EMS)

The City will monitor growth and demand for fire and emergency medical services in the study area in order to determine if/when additional personnel, equipment, or facilities are needed and will regularly review trends to ensure the City and Fire District 1 have enough advance time to address the needs.

The City and Fire District 1 should work together to plan for pedestrian improvements, such as wider sidewalks, to ensure that the opportunity for emergency vehicle maneuvering is maintained.

Additionally, the City should continue efforts to find sufficient resources to retain and improve Fire District 1's current level of services provided. Efforts include exploring additional funding sources – such as a Fire Benefit Charge or Levy Lid Lift; pursuing ways to reduce unnecessary costs/eliminate redundancy, including potential opportunities to partner with neighboring cities, Fire District 7, and other Fire Protection agencies through regional consolidation; and planning for the possible formation of a Regional Fire Authority in South Snohomish County.

SCHOOLS

The Edmonds School District tracks information on growth in enrollment and demand for educational programs offering across all grade spans in the region, including the study area, as part of its determination about if/when additional personnel or facilities are needed. The City will periodically review trends and information from the Edmonds School District, to ensure the City and the Edmonds School District have enough advance time to address the needs, including grade configuration, optimum facility size, educational program offerings, classroom utilization, scheduling requirements, and the use of temporary classroom facilities.

Additionally, the Edmonds School District will continue to evaluate both condition and capacity of existing facilities at Westgate and Sherwood Elementary Schools to determine if capital improvements are needed.

PARKS AND OPEN SPACE

The following steps should be taken to mitigate for impacts to Parks and Open Space under the Planned Action:

- Require on-site open space as a residential amenity for new development.
- Encourage and promote public open spaces through public/private partnerships where possible.
- Implement pedestrian and bicycle transportation improvements to provide greater access to existing facilities within one-half mile of the study area, with a focus on removing Highway 99 as a physical barrier.
- Existing recreational programs may see increased enrollment and increased revenue as people living in the study area enroll in more programs. This increased enrollment may marginally help offset the costs of providing additional facilities.

ELECTRICITY

The following steps should be taken to mitigate for impacts to the electrical grid under the Planned Action:

- Evaluate and identify future service system needs through coordinated electricity demand planning between the City Development Services Department and Snohomish County PUD.
- The PUD is currently undergoing smart grid infrastructure modernization of its electrical distribution system to improve reliability and increase efficiencies for its customers.
- Where feasible, reduce the use of power in building heating and cooling through passive systems and modern power saving units.

STORMWATER

No additional mitigation measures are recommended.

3.5.3 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

There are no significant unavoidable adverse impacts related to police, fire and emergency medical services, parks and open space, electricity, or stormwater. Although demand for these services would increase, the application of existing plans and codes or other mitigation measures can reduce impacts associated with future growth under both alternatives.

CHAPTER 4 COMMENTS AND RESPONSES

<i>Letter #</i>	<i>Date Received</i>	<i>Commenter Name</i>
1	07.03.2017	Eric Joseph Goodman, Community Transit
2	06.29.2017	Stanley V. Piha



July 3, 2017

Rob Chave, Manager - Planning Division
City of Edmonds, Development Services
121 5th Avenue North
Edmonds, WA 98020

Re: Planned Action Draft EIS for the Edmonds Highway 99 Subarea Plan (June 2017)

Dear Rob,

Community Transit appreciates the opportunity to provide comments on long range planning projects and current development proposals. Because land use decisions have the greatest impact on our ability to provide transit service, it is our policy to evaluate projects for their compatibility with Community Transit's current operations and Long Range Transit Plan. The goal is ensuring the agency's ability to continue providing public transportation service in an efficient manner for Snohomish County. Staff is providing the following comment in response to the Planned Action Draft Environmental Impact Statement issued for the Edmonds Highway 99 Subarea Plan.

In general, Community Transit supports the preferred alternative for accommodating more infill growth and making key investments to the transportation system. Transit is most efficient when serving areas with high land use intensities, mixed-use developments and connective walking networks. Among the key benefits for transit riders in the preferred alternative are proposed improvements in pedestrian access to transit throughout the study area.

As a transit provider, Community Transit has the following specific comments:

1. Transportation Demand Management services in the area are provided by Community Transit. We can work with the city, employers and developers to adopt an effective mix of strategies as mitigation measures. Please consider addressing an emerging area of concern that falls generally under parking management: the use of curb space by delivery and transportation network companies (TNC's). New policies may be needed to ensure the impact of these growing services is positive rather than negative for other road users.
2. Community Transit supports the preferred alternative, particularly for its inclusion of a new safe pedestrian crossing of Highway 99 that would improve access to transit stops, and for recommending wayfinding and new sidewalk construction or completion on several streets that connect stops to nearby neighborhoods, businesses and health care facilities.
3. Section 3.2 gives a good description of the relationship to other existing plans. This section could also reference plans produced by Community Transit such as the annual Transit Development Plan or the Long Range Plan. Regional plans or programs such as Sound Transit 2 also contain important contextual information.

4. Section 3.4 Transportation:
 - a. Could reference the Transit Emphasis Corridors identified in Community Transit's Long Range Plan.
 - b. Under the heading "transit" the second paragraph states that 9 routes serve Edmonds. (*Swift* Blue Line, 101, 115, 116, 119, 130, 405, 416, 871). There is one additional route serving other parts of the city that is not counted (Route 196).
 - c. The third paragraph should state that there are two station pairs or four stations.
 - d. Figures 3.4.2 and 3.4.3 could be more informative if *Swift* stations were shown in both directions. In addition, the position of the stations shown at 212th St on the map needs to be corrected to show the actual location of the stations at 216th St. The location of Swedish Hospital also appears to be too far north. Finally, "Priority Transit Corridors" shown on the map are slightly different from the Transit Emphasis Corridors identified in Community Transit's Long Range Plan.
5. In Table 3.4.5:
 - a. Community Transit is not currently planning additional stations due to the negative impact they would have on travel times and operational efficiency. The section on transit service should indicate that any new *Swift* Stations on the existing line would be at the jurisdictions expense.
 - b. Community Transit has safety concerns about the expansion of crossing distances on Highway 99 and the impact of right turn lanes at 220th and 216th adjacent to B.A.T. Lanes and transit stop or station locations. We support the goal of maintaining traffic flow and will work with the city to address these concerns if and when the projects move forward.
6. The additional *Swift* trips mentioned under Planned Transit Improvements have been implemented. Further increases are anticipated to include a return to 10 minute daytime headways on *Swift* and improved weekend service. There will also be additional trips on commuter and UW service. A study is currently underway to determine feasibility of a *Swift* Orange Line alignment running East and West from Lynnwood and another study will be underway shortly to investigate extension of the Blue Line to meet Link Light Rail in Shoreline at the 185th St Station.
7. Community Transit strongly supports the transit access improvements described in Table 3.4.6.
8. Table 3.4.10 does not identify the separate impacts to travel time, speed and LOS in the Business Access and Transit lanes on Highway 99. This is an important consideration with significant impact on the cost of transit operations.
9. Section 3.4.3 acknowledges the difficult tradeoffs inherent to transportation planning. We appreciate the discussion of secondary impacts and the approach of monitoring conditions until the mitigation measures are clearly necessary.
10. In figure 22, the position of the stations shown at 212th St on the map needs to be corrected to show the actual location of the stations at 216th St.

Thank you again for the opportunity to provide comments on the Planned Action Draft EIS, and the invitation to participate in the planning process for the Highway 99 Subarea Plan. We look forward to continuing discussions regarding the best way to serve Edmonds with quality transit service. Please feel free to contact me if you have any questions.

Sincerely,

Eric Joseph Goodman, AICP
Transportation Service Planner
eric.goodman@commtrans.org
(425) 348-2307

cc: Community Transit Development Review Team

RESPONSE DEIS LETTER 1: ERIC JOSEPH GOODMAN, COMMUNITY TRANSIT

- 1: **Transportation Demand Management** Thank you, your comment is noted and incorporated in mitigation measures.
- 2: **Pedestrian Crossing** Thank you, your comment is noted.
- 3: **Existing Plans** Community Transit's Transit Development Plan is referenced in Section 3.4 and additional consideration of Community Transit plans is now reflected in Section 3.2.
- 4: **Transit Emphasis Corridors** Transit Emphasis Corridors are included in Table 3.4.6.
- 5: **Routes** Thank you. We've changed the text to reflect the 10 routes that serve Edmonds. The addition of route 196 does not change figure 3.4.2 as the route crosses Hwy 99 outside of our study area.
- 6: **Number of Swift Stations** Thank you. We've changed the text to reflect the two station pairs, each offering both northbound and southbound service.
- 7: **Figures 3.4.2 and 3.4.3** Thank you, we've made the following changes to these maps:
 - » Swift stations are shown in both directions
 - » Station location corrected to be at 216th St
 - » Swedish Hospital location corrected
 - » We're looking into how to portray the difference between Transit Emphasis corridors and Priority Transit Corridors
- 8: **Increased service to existing stations:** We've changed the text to the following: "Community Transit anticipates expanding service to existing transit facilities along the 228th Street SW and Lakeview Drive corridors in coordination with the opening of the LINK light rail station at the Mountlake Terrace Transit Center in 2023."
- 9: **Crossing Distances** Thank you, your concerns are noted.
- 10: **Increased Swift Service** Thank you, we've changed the section on Planned Transit Improvements to reflect your recent increases in service, planned further increases, and your current feasibility study for the Orange Line.
- 11: **Transit Access Improvements** Thank you, your support is noted.
- 12: **Separate Impacts to Business Access and Transit Lanes** Thank you. We agree that the separate impacts to business access and transit lanes are an important consideration.
- 13: **Secondary Impacts** Thank you, your comment is noted.
- 14: **Stations at 216th St** Thank you, we've updated the map to accurately reflect the location of the 216th St stations.

LETTER 2

From: Stanley V. Piha [mailto:stanley@stanleyre.com]
Sent: Thursday, June 29, 2017 10:17 AM
To: Planning
Subject: Comment to DEIS for the Highway 99 Subarea plan

Dear Rob and Shane,

The preferred alternative map in the DEIS is incorrect and does not conform to the Alternative 2 map that has been presented and approved by the Planning Board and presented to the City Council as part of the presentation and public hearing process.

The map of the preferred alternative that has been presented and approved specifically shows the RM 2.4 zoned properties within the boundaries of the corridor that lie east of Highway 99 on 236th Street SW being changed to the CG zone. The map of the preferred alternative in the DEIS incorrectly shows that the RM 2.4 zoned properties within the boundaries of the corridor that lie east of Highway 99 on 236th SW being remain zoned RM 2.4.

I have communicated this error to the consultant working on this subarea plan. The consultant has acknowledged the error and responded that they would be changing the map in the DEIS. As of this date that change has not occurred.

I am submitting this comment in advance of the July 3rd end date for comments to the DEIS. I believe the substitution can easily be made to reflect the correct map.

Sincerely,

Stanley V. Piha

Stanley Real Estate, Inc.

2101 4th Avenue, Suite 310

Seattle, WA 98121

[206-441-1080 x1](tel:206-441-1080)

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WWW.stanleyre.com

RESPONSE DEIS LETTER 2: STANLEY V. PIHA

- 1: Preferred Alternative Map** Thank you, we've updated the Alternative 2 map to accurately reflect the change in zoning from RM 2.4 to CG for those properties.

CHAPTER 5 REFERENCES

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