

## STAFF REPORT

**TO:** Everett Planning Commission  
**FROM:** Lisa Grueter, AICP, Principal BERK Consulting, Inc. on behalf of Everett Parks and Facilities Department, Bob Leonard, Director and Kimberly Shelton, Deputy Director, and Everett Planning, Yorik Stevens-Wajda, Director  
**DATE:** September 2, 2021  
**SUBJECT:** Comprehensive Plan Parks Element and Parks Impact Fees

### OVERVIEW

This staff report addresses proposed amendments to the Comprehensive Plan Parks and Recreation Element and Capital Facilities Element, a proposed new Chapter 19.53 EMC that establishes a Parks Impact Fee, and revisions to EMC 19.09.050 (Required outdoor and common areas). The impact fee is supported by a rate study.

### PROCESS

Amendments to the Comprehensive Plan and Unified Development Code are addressed under EMC [15.03.300](#), [15.03.400](#), and [15.02.095](#) – Legislative Actions.

#### Public Notice

Regular announcements about the annual docket are included on the planning department [homepage](#). A planning commission public hearing notice will be published for the pending hearing date. See below for noticing under the State Environmental Policy Act.

#### Interjurisdictional Coordination

A 60-day notice of the proposal will be sent to state agencies via the Washington State Department of Commerce in conjunction with the Planning Commission briefing packet.

#### State Environmental Policy Act

A SEPA non-project environmental checklist for the proposal has been completed by the consultants to the Everett Parks and Facilities Department. A determination of non-significance is anticipated to be issued prior to the public hearing. Official notice will be published in The Everett Herald with a fourteen-day comment period.

#### Other Public Engagement

Public engagement for the Parks, Recreation, and Open Space Plan Update that is happening in parallel with the docket application has informed the proposal. See the [project website](#). Results of a public survey and events can be found at the project website.

As well the Board of Park and Tree Commissioners had a [briefing on August 10, 2021](#) and reviewed an earlier version of the Parks and Recreation Element, and reviewed information on the proposed impact fee.

## PROPOSAL

The city is proposing its first parks impact fee which must meet the provisions of RCW [82.02](#), and it must be based on a level of service (LOS) and capital program established under the Growth Management Act (GMA). It needs to support the growth planned in the City's Comprehensive Plan which addresses a 2035 horizon year. Soon the plan will be updated for a 2044 horizon year.

Everett's GMA Comprehensive Plan contains elements or chapters that meet the requirements of GMA (RCW [36.70A.070](#)); with amendments the plan can support the impact fee. The Parks and Recreation element and Capital Facilities element generally include inventories, goals and policies including levels of service, and a capital facilities program including a revenue analysis.

Text and policies updated in the elements include:

- Parks and Recreation Element
  - summary inventory data and maps,
  - community profile and potential system gaps and needs,
  - related plans and initiatives,
  - parks facilities levels of service,
  - goals and policies,
  - actions
- Capital Facility Element
  - system description amendments and minor updates to climate strategy actions
  - capital program for a 10-year period

The goals and policies in the Parks and Recreation Element cover:

- Wellbeing, Inclusion, Equity
- Capacity
- Variety and Quality
- Connection and Access
- Natural Environment and Shorelines
- Trees
- Golf Courses
- Maintenance and Safety
- Recreation
- Financially Sustainable
- Partnerships and Integrated Planning
- Public Participation
- Department Operation

**Key Amendments:** An important component of the proposed policy and code amendments is a level of service standard. This standard establishes what the city would provide in terms of parks and trails to support a growing community. This level of service in turn drives the capital improvement program in the Capital Facilities Element. The level of service is proposed at a level that can be funded through parks impact fees and other revenue sources (e.g. grants and Real Estate Excise Tax).

The proposed parks impact fee chapter relies on the level of service policy and capital improvements list. The attached rate study identifies the basis for the draft fees. The code is organized in a similar framework as the city's school impact fee chapter (EMC [19.52](#)).



**Other Amendments:** In addition to levels of service, the amended goals and policies also help fulfil Growth Management Act provisions to plan for capital facilities and public services and promote physical activity. (RCW 36.70A.070) The goals and policies of the Parks and Recreation Element will align with the [pending Parks, Recreation, and Open Space \(PROS\) Plan](#) that helps the City qualify for grants.<sup>1</sup>

The policies also consider the [City Priorities](#) for quality of life and economic and cultural vitality and the [Mayoral Directives](#) on promoting equity and inclusion.

The goals and policies also reflect professional best practice. They can help the City work towards accreditation through the National Recreation and Park Associations Commission for Accreditation of Park and Recreation Agencies (CAPRA) which provides a measure of an agency's overall quality of operation, management, and service to the community. Communities in Washington State that have received such accreditation include Bellevue, MetroParks Tacoma, and Shoreline.

Since the 2021 annual comprehensive plan amendments are occurring in a similar timeframe as the PROS Plan Update, the more complete set of policy amendments are proposed for Planning Commission review.

### **Level of Service and Impact Fees Policy and Code Options and Recommendations**

Fundamentals of the proposal consist of setting a level of service to guide the level of investment in capital facilities as growth occurs consistent with Everett's growth targets. The level of service identifies the added parks acres and trail miles needed to add capacity to the system, and the resulting projects are included in the capital facility plan. Accounting for other funding sources, the proposal sets an impact fee to charge new development to support the projects needed to meet the level of service. There are a range of options that vary the levels of service, residential or employment population served, and capital facilities supported by the fee. Following a description of the options, pros and cons are addressed.

#### Residential Equivalent – Full Population and High Share of Employment

The proposal establishes a level of service for developed parks, neighborhood/urban parks, paths, trails, access, and investment. The level of service would be applied to future residents and jobs. The method accounts for all expected population growth by 2031 (the 10-year window for the impact fee collection), and the method is also applied to the Comprehensive Plan growth targets for 2035. Employees are not counted to 100%. Instead, a portion of the anticipated employment is included to come up with a residential equivalent, where the full number of expected jobs is discounted based on the hours of park availability in a workday compared to the hours of park availability to a resident, and also discounted for jobs filled by residents of Everett. The full residential population is included in this approach, and nearly half (45.9%) of the expected industrial, office/service, and retail jobs are accounted.

Alternatives to the proposed level of service policy and impact fee could alter the balance of impact fees, and include:

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<sup>1</sup> Everett is developing an update to its 2016 [Parks, Recreation and Open Space \(PROS\) Plan](#). The PROS Plan will allow the City to be eligible for state grants through the Washington State Recreation and Conservation Office (RCO). The PROS Plan will also support other City plans and budgets by helping prioritize projects and programs consistent with the community's vision, service standards, and funding. The effort began in January 2021 and will conclude by March 1, 2022. The PROS Plan is a system plan that supports the Comprehensive Plan and helps the Parks and Facilities Department manage its park system.



Residential Equivalent Option 1 – Full Population and Moderate Share of Employment

Assuming a smaller share of employment (23% which is about half of 45.9%). This would recognize that some employers do provide substantial onsite recreation (e.g. Boeing, Navy). The residential fee would be a little higher as there would be a higher proportion of residential population to shoulder the fee.

Residential Equivalent Option 2 – Hybrid Full Population and LOS and Partial Employment and LOS

Assuming a smaller share of employment (23%) and that employment would primarily contribute to the types of parks and trails categories that may be more attractive to employees, including multipurpose trails that can support recreation and commuting as well as neighborhood/urban parks that are identified to help fill gaps largely in mixed use and employment areas (e.g. Downtown, future station areas in District 4, and other corridors). It would contribute in proportion to its share of the equivalent population some support for investment in existing trails and neighborhood/urban parks.

Residential Only Option 3 – Residential only

Another possible path to meeting the level of service and implementing an impact fee would be to charge only residential development. The fee per bedroom would be higher because the level of service would be focused on residents and the resulting capital needs would be shouldered by population alone.

Table 1 shows the levels of service with each option. The levels of service vary since they take a similar acres or miles in the current system and divide them by a different population/equivalent.

**Table 1. Levels of Service Options 2021-2031**

| Level of Service                      | Residential Equivalent         | Residential Equivalent Option 1 | Residential Equivalent Hybrid Option 2                | Residential Option 3 |
|---------------------------------------|--------------------------------|---------------------------------|---|----------------------|
| Population Growth 2021-2031           | Residential Equivalent: 49,963 | Residential Equivalent: 44,143  | Residential Equivalent: 44,143<br>Residential: 38,353 | 38,353               |
| Acres per 1000 residential equivalent |                                |                                 |   |                      |
| Developed Parks                       | 1.3                            | 1.4                             | 1.7   | 1.7                  |
| Neighborhood / Urban Parks            | 0.4                            | 0.5                             | 0.5   | 0.6                  |
| Miles per 1000 residential equivalent |                                |                                 |   |                      |
| Path Trails                           | 0.11                           | 0.12                            | 0.14  | 0.14                 |
| Multipurpose Trails                   | 0.08                           | 0.09                            | 0.09  | 0.11                 |

Table 2 shows the impact fee rates associated with each option. Where less employment is included in the calculations the relative share of cost to meet the levels of services is borne to a greater degree by residential development.



**Table 2. Impact Fee Rates 2021-2031**

| Use Type             | Residential Equivalent | Residential Equivalent Option 1 | Residential Equivalent Hybrid Option 2 | Residential Option 3 |
|----------------------|------------------------|---------------------------------|--|----------------------|
| Industrial per sq ft | \$1.28                 | \$0.73                          | \$0.51                                 | \$0                  |
| Office & Services    | \$1.89                 | \$1.07                          | \$0.75                                 | \$0                  |
| Retail               | \$1.02                 | \$0.58                          | \$0.41                                 | \$0                  |
| Per Bedroom          | \$1,579                | \$1,789                         | \$1,871                                | \$2,063              |

The residential rate is in the range of other communities in the region. Charging employment rates is less common in park impact fees but there are some charged in the county and region and the proposed rates are comparable and in the range of those who do apply them. The Power Point presentation contains some of the comparisons to be shared at the study session. Phasing in the fees is possible to provide certainty for developments that are in progress.

**Amendments to common and open space area requirements (EMC 19.09.050)**

To support development feasibility while advancing the parks level of service and capital plan, staff propose amending the Multifamily Open Space standards in EMC 19.09.050 to reduce on-site required common and open space areas to reflect the enhanced park and recreation facilities that this overall proposal would provide.

Residential development in higher density zones (UR3, UR4, NB, B, MU, LI1) must currently provide 75 square feet of common/outdoor space per studio/1-bedroom dwelling unit and 100 square feet per 2+ bedroom dwelling unit (Table 2). Depending on the option, the proposed impact fee would support the development of 42-55 square feet of neighborhood parks per bedroom, providing a rationale to reduce the required on-site common and open space area requirement.

Existing regulations provide a route to reducing the common and open space area requirements via a fee in lieu (EMC 19.09.050(10)). The proposal would define a reasonable fee in lieu rate based on the average capital cost per square foot of neighborhood parks as identified in the capital facilities element of the comprehensive plan (currently \$37.50/sq. ft. based on the proposed capital facilities element). The proposal would also limit full availability of the fee in lieu option to developments proposed within ½ mile of an existing or planned park facility; developments farther from existing or planned parks could reduce the common and open space area requirement by half using a fee in lieu.

**ANALYSIS**

Table 3 qualitatively shares pros and cons of the different options.

**Table 3. Pros and Cons of Options**

| Option  | Pros   | Cons   |
|---|--|--|
| Residential Equivalent– Full Population and High Share of Employment – Proposal | <p>Recognizes that public parks and trails create an improved quality of life for people and attract economic development.</p> <p>Residential and employment population create a demand for recreation and the levels of service and fees allow the City</p> | <p>Added fees across uses may incentivize some uses that have lower fees over those that have larger fees. The fees would increase the cost of development, and could reduce the city’s competitiveness. While the fee would be an upfront cost, it should be noted that</p> |



| Option  | Pros   | Cons   |
|---|--|--|
|   | <p>to develop a connected and varied system of parks of all sizes and trails and paths of all sizes,</p> <p>The parks and trails will help fill gaps in areas where more mixed use, residential, and employment growth is planned.</p> <p>The method distributes the levels of service and fees across uses in a more balanced way (residential versus non-residential).</p>   | <p>over a longer term, parks and trails enhance property values and improve the attractiveness of the city for new employers and residents.</p> <p>Some large employers have onsite recreation (e.g. Boeing and the Navy) and some types of parks and trails may be less used by employees. This is not accounted in the share of employment included in the calculation of the level of service or fee.</p> |
| Residential Equivalent Option 1 – Full Population and Moderate Share of Employment            | <p>Similar to the Proposal. In particular, the method distributes the levels of service and fees across uses in a more balanced way (residential versus non-residential).</p> <p>Because less employment is included to account for larger private onsite recreation opportunities the fees may be more feasible for new job-based development; yet such uses would contribute to the systemwide improvements that are likely more used by employees, multipurpose trails and neighborhood/urban parks in proximity to growth nodes.</p> | Similar to the Proposal. Residential fee is relatively higher than under the Proposal. The fee in lieu amendments could assist with feasibility of construction.   |
| Residential Equivalent Option 2 Hybrid Full Population and LOS and Partial Employment and LOS | <p>Similar to the Proposal and Option 1.</p> <p>This proposal would result in less balance between residential and non-residential uses in the fees but would make the non-residential fees more feasible and account for major employer onsite private recreation.</p>  | Similar to the Proposal. Residential fee is relatively higher than under the Proposal. The fee in lieu amendments could assist with feasibility of construction.   |
| Residential Only Option 3   | Focuses the level of service and demand on residential population where most demand is anticipated (under all options).  | The residential fee would be the highest studied. The fee in lieu amendments could assist with feasibility of construction.  |

**CRITERIA**

The criteria for the policy and code amendments are addressed in EMC [15.03.300](#) and [15.03.400](#).

**Policy Amendments ([15.03.400](#))**

Criteria 1. Have circumstances related to the subject policy changed sufficiently since the adoption of the plan to justify a change to the subject policy? If so, the circumstances that have changed should be described in detail to support the proposed amendment to the policy.



*Discussion: The adopted Parks and Recreation element calls for consideration of a parks impact fee (Strategy 9.4.4), and the docket would help fulfill the policy. The impact fee requirements in RCW 82.02 include that such a fee be based on a Capital Facilities Element, which in turn should be based on a level of service. The proposed Parks and Recreation and Capital Facilities Element respond to identified needs and gaps for parks and update an older capital facility list.*

Criteria 2. Are the assumptions upon which the policy is based erroneous, or is new information available that was not considered at the time the plan was adopted, that justify a change to the policy? If so, the erroneous assumptions or new information should be described in detail to support the proposed policy amendment.

*Discussion: Updated information has been gathered regarding the parks and recreation inventory, changing community demographics and gaps in the park system, and more current capital facility needs.*

Criteria 3. Does the proposed change in policy promote a more desirable growth pattern for the community as a whole? The manner in which the proposed policy change promotes a more desirable growth pattern should be described in detail.

*Discussion: The proposed policies respond to changing community demographics and gaps in parks and trails. This will support a higher quality of life and more physical activity. The amendments would help provide recreation amenities as growth occurs across the community including in centers and corridors as planned in the Land Use Element.*

Criteria 4. Is the proposed policy change consistent with other existing plan policies, or does it conflict with other plan policies? The extent to which the proposed policy change is consistent with or conflicts with other existing policies should be explained in detail.

*Discussion: The Parks and Recreation Element cross references to the 2016 PROS Plan for the current parks level of service standard. The current level of service is based on ensuring the City adds to the value of the park system as growth occurs (identifies an investment value per capita) and that 32 different facility types would be improved as growth occurs (e.g. maintain current ratios of park lands, trails, playgrounds, picnic tables, several types of athletic fields, waterfront facilities, and many more).*

*The proposed level of service in the Parks and Recreation Element amendments is similar to the existing level of service in that it includes an investment per capita component with updated data, but it is simpler in that it focuses on four primary assets: developing parkland, neighborhood parks, paths, and trails. It would also address the distribution of facilities to promote park access to the Everett population within 10 minutes.*

*The proposed neighborhood parks level of service, and partnership policies with schools and other entities, support Land Use Element Policy 2.1.5 and Urban Design Element Policy 8.6.9:*

- *Policy 2.1.5 Promote development of neighborhood parks and use of existing public school recreational facilities for year-round use by the residents of Everett's neighborhoods.*
- *Policy 8.6.9 Provide special facilities for children, both outdoors (e.g. mini-parks) or indoors, in several locations.*

*The other Park and Recreation policy amendments improve consistency with other city plans and initiatives (e.g. hazard mitigation, climate, shoreline master program and public access plan). See Section D "Parks and Other Initiatives" on Page 6 of the proposed Parks and Recreation Element*





amendments. Policies refer to the climate action plan (Policy 9.8.7), and support shoreline access (Policy 9.8.4).

The policy amendments update an older Capital Facility Element schedule of projects. (See Capital Facility Element Table 2) and would improve consistency and implementation.

Amendments would also remove a policy suggesting a concurrency process for parks (in place at the time of development). If an impact fee is implemented it would allow for a development to address its demand and contribute to the cost of park system capacity improvements. Park impact fees need to be spent within 10 years of collection for capital projects identified in the Capital Facility Element.

- ~~Policy 6.1.6 Because parks and recreation facilities are vitally important to establishing and maintaining the quality of life in Everett, ensuring the health of families and youth, and contributing to the economic and environmental well-being of the community, the City should consider adopting level of service concurrency standards for parks and recreation. Reserved.~~

Parks and Recreation Element tree canopy policies support Urban Design Element Policy 8.1.3:

- Policy 8.1.3 Manage all trees in public rights-of-way, parks and other public properties, and preserve or expand the size of the city's tree canopy, replacing trees which have to be removed with one or more trees.

Maintenance policies support Urban Design Element Policy 8.1.15:

- Policy 8.1.15 Give parks, greenbelts and open spaces extraordinary attention with respect to design, conservation, and maintenance, because they strongly contribute to the livability of Everett's neighborhoods.

### **Code Amendments (15.03.300)**

Criteria a. The proposed amendment is consistent with the applicable provisions of the Everett comprehensive plan; and

*Discussion: The adopted Parks and Recreation element calls for consideration of a parks impact fee (Strategy 9.4.4), and the docket would help fulfill the policy.*

Criteria b. The proposed amendment bears a substantial relation to public health, safety or welfare

*Discussion: The proposed code supports the development of parks and trails important for public health, safe access to destinations, and quality of life. The purposes of the code are to:*

- Develop a program consistent with Everett's Parks, Recreation, and Open Space Plan or equivalent parks system plan for the joint public and private funding of public parks facilities and services necessitated in whole or in part by development within the city of Everett;
- Create a mechanism to charge and collect fees to ensure that development bears its proportionate share of the capital costs of public parks facilities necessitated by development; and
- Ensure fair collection and administration of such parks impact fees.





Criteria c. The proposed amendment promotes the best long-term interests of the Everett community.

*Discussion: The amendments support the long-term management of the park system in a sustainable manner with a funding source that can help achieve the City's levels of service to serve the Everett community.*

## **PUBLIC COMMENTS**

Public comments on the proposal are pending. The Board of Park and Tree Commissioners had a [briefing on August 10, 2021](#) and reviewed an earlier version of the Parks and Recreation Element, and reviewed information on the proposed impact fee. They agreed with the overall direction of the Parks and Recreation Element policies, and the approach to the level of service and impact fee.

Other public input on the PROS Plan update, and the proposed Parks and Recreation Element and findings helpful to understand desires, gaps, and directions can be found at the project website including:

- [Vision survey results](#)
- [Park pop-up events results](#)
- [Vision workshop](#)

## **STAFF RECOMMENDATION**

Staff recommends the Planning Commission consider the proposal and its options and work with staff at the September 7, 2021 meeting to develop a preferred option that will be advanced to a public hearing on September 21, 2021. The initial staff preference, balancing the benefits of parks to a vital, healthy, and attractive community with the need to maintain competitiveness and feasibility for residential and commercial development, is **Residential Equivalent Option 2 – Hybrid Full Population and LOS and Partial Employment and LOS**.

## **EXHIBITS**

- Exhibit A-1: Parks and Recreation Element Amendments
- Exhibit A-2: Capital Facilities Element Amendments
- Exhibit A-3: New Chapter 19.53 EMC (parks impact fees)
- Exhibit A-4: EMC 19.09.050 Amendments (open space-fee in lieu)
- Exhibit B: Impact Fee Rate Study

