Chapter 3

AFFECTED ENVIRONMENT, IMPACTS of ALTERNATIVES, MITIGATION MEASURES, and SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS
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Chapter 3 describes the affected environment, impacts of the EIS alternatives, mitigation measures, and any significant unavoidable adverse impacts on the environment that are anticipated from development of the Park District site under the EIS alternatives.

3.1 EARTH

This section of the DEIS describes the geotechnical conditions on and near the Park District site. Potential impacts from development of the EIS alternatives on geotechnical conditions are evaluated and mitigation measures identified. This analysis is based on the Earth Report prepared by GeoEngineers in August 2023 (see Appendix B).

Methodology

Field explorations and laboratory testing were performed to identify and evaluate subsurface conditions at the site to develop engineering recommendations for design of the project. The subsurface soil and groundwater conditions were evaluated through a field exploration program that consisted of drilling and sampling 22 borings and excavating and sampling 13 test pits. Soil samples obtained from the borings and test pits were evaluated to confirm or modify field classifications, as well as to evaluate engineering properties of the soil. Previous explorations for Everett Housing Authority’s Madrona Square development also included ten infiltration test pits on the Park District site.

U.S. Geological Survey mapping and City of Everett regulations related to geological hazards (EMC 19.37.080) were also reviewed.

See Appendix B for details on the methodology for the geotechnical analysis.

3.1.1 Affected Environment

This sub-section describes the existing geotechnical conditions on and near the Park District site.
**Topography**

The topography at the site is generally rolling and slopes down moderately towards the east. Elevations range from approximately 115 to 119 feet along the western edge of the site to approximately 67 to 73 feet along the eastern edge (see Figure 2-4, Existing Site Conditions, in Chapter 2).

**Geology**

The site is located near the crest of a glaciated upland on the east side of a major glacial trough now occupied by Possession Sound. The glaciated upland is characterized by north-south elongated ridges comprised of glacially consolidated deposits. Based on United States Geological Survey (USGS) maps of the area, the geologic units in the immediate site vicinity consist of glacially consolidated Vashon Till deposits (glacial till). Advance outwash deposits are mapped along the eastern perimeter of the site along Pine Street. Although not shown on the geologic maps in the site vicinity, glaciolacustrine deposits were encountered in the site explorations along the east side of Pine Street. Below are further descriptions of these geologic units.

- **Glacial till** is generally a non-sorted, non-stratified mixture of sand, gravel and silt that has been overridden by several thousand feet of ice. It typically has high shear strength, low consolidation, and low permeability characteristics in the undisturbed state. It typically develops a “weathered” zone where seasonal groundwater perches on top of the relatively impermeable un-weathered till and the perched groundwater occurs as seepage following the site topography.

- **Advance outwash deposits** are mostly clean, pebbly sand with increasing amounts of gravel higher in the section deposited by meltwater flowing from the advancing front of the Vashon glacier. This unit typically has high shear strength, low consolidation, and moderate permeability characteristics in the undisturbed state.

- **Glaciolacustrine deposits** generally consist of massive to bedded silt, clay, and sand with minor amounts of peat and gravel. The glaciolacustrine deposits are generally in a stiff to hard condition due to being overridden by several thousand feet of ice. Cobbles and boulders may also be present within the glaciolacustrine deposits.

**Soils**

The general subsurface conditions consist of topsoil and fill overlying native glacial till and glaciolacustrine deposits. The subsurface soil conditions are summarized below:

- **Asphalt Pavement/Gravel**: Approximately 1 inch of crushed gravel underlain by 3 inches of asphalt concrete pavement occurs in the parking area at the southwest corner of the site.

- **Sod**: approximately 3 to 4 inches of sod/topsoil were encountered in the lawn areas.

- **Fill/Weathered Glacial Till**: Fill and/or highly weathered native glacial till generally consisting of very loose to medium dense silty sand with occasional gravel and various amounts of organic matter was encountered above the native glacial soils throughout the site. Localized areas of cleaner sands were observed in some areas.
A silty gravel with sand layer was also observed above the localized clean sand layer in one location. Construction debris consisting of brick fragments and asphalt and concrete debris were observed within the fill in some areas. The fill/weathered glacial till thickness ranged from about 1¾ to 7 feet deep.

- **Glacial Till**: Glacial till was encountered below the fill/weathered till throughout the site. Where encountered, the glacial till generally extended to the depths explored. The glacial till generally consisted of dense to very dense silty sand with variable gravel and cobble content. Occasional layers of hard silt with varying amounts of sand and gravel were also observed within the till.

- **Glaciolacustrine Deposits**: Glaciolacustrine deposits were encountered below the fill/weathered glacial soils along the east side of the site. The glaciolacustrine deposits consisted of medium stiff to hard silt and clay and typically exhibited oxidation staining near the top of the unit. Where encountered, the glaciolacustrine deposits extended to the depths explored.

See Appendix B for details on soils and geology.

**Geologic Hazards**

The City of Everett defines and identifies geologic hazard critical areas in its Geologically Hazardous Areas Ordinance (Everett Municipal Code [EMC] Chapter 19.37.080) and has developed a GIS map that identifies geologically hazardous areas. Geologically hazardous areas include landslide hazards, seismic/liquefaction hazard areas, erosion hazard areas, and other areas which the City has reason to believe are geologically hazardous (see Appendix B for details and definitions of geologic hazards in the City of Everett).

**Landslide Hazard**

Based on the City of Everett GIS mapping, the Park District site does not contain any mapped landslide hazard areas. The site is located on terrain that is moderately inclined to the east, with an overall gradient of approximately 6 to 7.5%. There are small, localized areas where steeper slopes exist, such as at steps, small retaining walls, and building platforms; however, these slopes were created through grading activities associated with prior development of the site and do not meet the landslide hazard criteria of EMC 19.37.080.A.1.g.

**Erosion Hazards**

City of Everett GIS maps do not indicate any erosion hazard areas on the Park District site. The erosion potential for the site would be low due to the relatively moderate gradient of the site.

**Seismic Hazards**

Seismic hazards include potential for liquefaction, lateral spreading, and fault rupture. The geotechnical evaluation indicates that the site does not have liquefiable soils and, therefore, has little to no risk of liquefaction-induced ground disturbance including lateral spreading. There are no mapped faults in the immediate vicinity of the site, with the
exception of the Southern Whidbey Island fault zone mapped approximately six miles southwest of the site. Therefore, the site is considered to be at low risk of fault displacement resulting in ground rupture at the surface.

**Smelter Contamination Area**

Based on the City of Everett GIS maps, the site is located within the Asarco smelter contamination area. Investigations were conducted in August 2016 by the Department of Ecology, including soil sampling for lead and arsenic which were identified as primary contaminants of concern (COCs). Based on arsenic concentrations that were detected during investigations, cleanup of various areas of the Everett Smelter Cleanup site were recommended, including on small area in the northwest portion of the Park District site between Poplar Street and Larch Street (see Figure 3.1-1, Smelter Cleanup Area).

A Construction Soil and Water Management Plan (CSWMP) was conducted for Everett Housing Authority in 2020 as part of the development of Madrona Square and the CSWMP also identifies the small area in the northwest corner of the site.

**3.1.2 Impacts of the Alternatives**

An analysis of the potential geotechnical impacts of Alternative 1, the Proposed Action, is provided below. For the other alternatives, the analyses focus on any differences between the alternatives and Alternative 1 (other aspects of these alternatives are expected to be similar to Alternative 1).

**Alternative 1 - Proposed Action**

Development under Alternative 1 would include construction of 1,500 residential units and 70,600 gross square feet (GSF) of non-residential use (retail, civic/service, and office uses) in 15 buildings. Structured parking would be provided. Open space would also be included. Modifications to roadways that cross the site are also proposed.

**Earthwork and Grading**

Development under Alternative 1 would require earthwork and grading. A total of approximately 129,300 Cubic Yards (CY) of cut and 30,300 CY of fill (a net of 99,000 CY of cut) are estimated for Alternative 1. Earthwork activities could impact adjacent structures and properties if not properly accounted for during design. Earthwork performed during the wet season could generate significant mud and turbid water if not properly planned. All fill placed for site development would be properly placed and compacted as structural fill.
Figure 3.1-1

Smelter Cleanup Area

Source: GeoEngineers, 2023.
Excavations for site improvements would be required, including underground parking for some of the buildings under Alternative 1. Excavations could impact adjacent structures, roads, sidewalks, and utilities if not properly designed. The use of inadequately designed open cuts could also impact the stability of adjacent work areas and existing utilities. Therefore, excavations may require temporary shoring depending on site constraints and/or use of temporary open cut slopes.

Permanent slopes for development under Alternative 1 would be designed and constructed at inclinations of 2H:1V or flatter to minimize the potential for instability in the long-term and under wet weather, and during possible seismic events.

The on-site soils are capable of supporting the proposed buildings with conventional shallow foundations bearing on undisturbed glacially consolidated soils.

**Geologic Hazards**

**Landslide Hazard**

There are no mapped landslide hazard areas at the site. However, there are small, localized areas where steeper slopes exist at the site, such as at steps, small retaining walls, and building platforms. The potential for landslide impacts under Alternative 1 is considered very low.

Clearing and grading of the site for development under Alternative 1 would expose soils, which could result in erosion and may slightly increase the risk of landslides. The small, localized steep slopes would be cut into, removed or graded flatter which could slightly increase the risk of landslides. However, with proper planning, clearing and grading, even in the small, localized steep slopes, are not anticipated to increase the potential for landslides.

**Seismic Hazards**

Potentially liquefiable soils are not present at the site and therefore there is no risk for liquefaction-induced settlement or lateral spreading with proposed development under Alternative 1. There is also a low risk of fault displacement resulting in ground rupture at the surface.

Strong ground motions can affect structures and their foundations if not designed and constructed in accordance with applicable code. Taller structures perform differently than shorter ones; taller buildings are more affected by low-frequency, larger amplitude, longer period shaking whereas smaller buildings are more affected by high-frequency, smaller amplitude, shorter period shaking. The type of construction can also influence the type of impacts. For instance, brick or masonry buildings generally perform poorly in an earthquake. Taller buildings constructed with steel tend to sway from the seismic waves and are designed and constructed accordingly. These strong ground motions could impact the taller buildings under Alternative 1; however, with design and construction consistent
with building code requirements, the impacts of these strong motions to buildings would be minimized and the potential for impacts considered low.

**Erosion and Sedimentation**

The clearing and grading at the site required for Alternative 1 would increase the potential for erosion and sedimentation. Construction activities including stripping and grading would expose soils to the erosional effects of wind and water. However, the erosion potential of on-site soils is generally low. The amount and potential impacts of erosion are partly related to the time of year that construction occurs. Wet weather construction would increase the amount and extent of erosion and potential sedimentation. With the implementation of erosion and sedimentation control measures required by City of Everett, significant impacts are not expected.

**Smelter Plume**

One relatively small area in the northwest portion of the site (between Poplar Street and Larch Street) that was impacted by the Asarco plume was identified by the Department of Ecology (Ecology) is requiring cleanup. Investigations were conducted in August 2016 by the Ecology, consisting of soil sampling for lead and arsenic, which were identified as primary contaminants of concern (COCs). Based on the arsenic concentrations detected in the soil in the investigation, the Ecology recommended cleanup at various areas of the Everett Smelter Cleanup site, including the one relatively small area in the northwest portion of the site.

Earthwork performed in this area under Alternative 1 could impact the disposal and potential re-use of soils for structural fill. An environmental study would be completed for the site to identify contaminants in the soil and provide recommendations for soil handling and disposal. Cleanup would occur in accordance with this study prior to development of Alternative 1.

**Alternative 2 - Design Alternative**

Development under Alternative 2 would include the same development program as Alternative 1 (1,500 residential units and 70,600 gross square feet of non-residential uses); however, there would be 17 buildings, two more than under Alternative 1. Structured parking would be provided. Open space would be included throughout the site; however, no large centrally located open space would be provided. Modifications to roadways that cross the site are also proposed.

**Earthwork and Grading**

Development under Alternative 2 would require earthwork and grading, similar to under Alternative 1. However, Alternative 2 would require more earthwork/grading due to excavations required for the two additional buildings. Overall excavation and slope conditions would be similar to Alternative 1 and significant impacts are not anticipated.
It is expected that the proposed buildings can be supported on conventional shallow foundations bearing on undisturbed glacially consolidated soils.

**Geologic Hazards**

The potential for development under Alternative 2 to occur in or in proximity to geologic hazard areas (landslide and seismic hazards) would be generally similar to Alternative 1, although because more building development and grading would occur under Alternative 2, the potential to encounter geologic hazards would be greater than under Alternative 1. As under Alternative 1, significant impacts associated with geologic hazards are not anticipated under Alternative 2.

**Erosion and Sedimentation**

Clearing and grading at the site would increase the potential for erosion and sedimentation. Because development under Alternative 2 would require more clearing and grading at the site than under Alternative 1, the potential for erosion would be greater than under Alternative 1. However, the erosion potential of on-site soils is generally low and with implementation of erosion control measures required by the City, significant erosion impacts under Alternative 2 are not anticipated.

**Smelter Plume**

Like under Alternative 1, an environmental study would be completed for the site to identify the contaminants in the soil related to the smelter plume and would provide recommendations for soil handling and disposal. Cleanup would occur in accordance with this study prior to site development under Alternative 2.

**Alternative 3 – No Action**

Under Alternative 3, the No Action Alternative, the site would remain in its existing condition. All the existing buildings and landscaping would remain for the time being, but demolition and removal of the buildings would ultimately occur under a separate action. For analysis purposes in the EIS, Alternative 3 assumes development under the site’s existing zoning and would include a total of up to approximately 458 housing units and no non-residential uses. Parking would be provided in surface lots.

Similar to Alternatives 1 and 2, construction under Alternative 3 would require earthwork, grading, and result in temporarily exposed soils. However, the potential for these impacts would be less than under Alternatives 1 and 2 because there would be less construction and associated earthwork under Alternative 3.

Like under Alternative 1, an environmental study would be completed for the site to identify the contaminants in the soil related to the smelter plume and would provide recommendations for soil handling and disposal. Cleanup would occur in accordance with this study prior to site development under Alternative 3.
Cumulative Impacts

There are no known construction projects that are proposed in the site vicinity. Nonetheless, local construction projects could occur at the same time as construction of the Park District project. The potential for these projects to result in earth-related impacts would depend on whether geologic hazards are located on or near the sites. These projects would be subject to City of Everett regulations for earthwork and created slopes. As a result, no significant earth impacts are anticipated from adjacent projects, in combination with the Park District.

Conclusion

No geotechnical hazard areas (e.g., landslide, seismic, or erosion hazards) have been identified onsite. One relatively small area in the northwest portion of the site contains soils that were contaminated by the Asarco smelter plume.

Clearing and grading would be required for redevelopment under EIS Alternatives 1, 2, and 3 that could result in earth-related impacts. The on-site soils are capable of supporting the proposed buildings, with the proposed construction techniques. Since no geotechnical hazard areas are present, and with implementation of required mitigation, landslide, seismic, and erosion impacts are not expected. Study and cleanup of the soil contaminants from the smelter plume would occur prior to site development.

3.1.3 Mitigation Measures

The following measures have been identified to address the potential earth-related impacts from operation of the Park District Project. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state, and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce impacts. Other Possible Measures are additional measures that could be implemented to address impacts but are not necessary to mitigate significant impacts.

Legally-Required Measures

- Temporary and permanent retaining walls and slopes would be designed and installed, in accordance with the City of Everett regulations to reduce the potential for landslides.

- Redevelopment would be accomplished under the seismic design criteria using current design codes (including the IBC and City of Everett codes) and generally accepted standards and practices at the time of design.
• Erosion and sedimentation control measures would be installed and maintained in accordance with the requirements of the City of Everett, and best management practices. Erosion control measures during construction would include:
  o Efficient surface water management;
  o Minimization of the size of disturbed areas;
  o Installation of erosion resistant slope covers;
  o Proper channeling of surface water runoff into lined diversion ditches that incorporate energy dissipater;
  o Use of straw bales, geotextile silt fences, and straw mulch, as appropriate for temporary protection of exposed soils; and
  o Finish grading, protecting, and vegetating disturbed areas as soon as practicable.

• As possible, construction would be performed during the dry season to reduce earth-related impacts. Any construction during the wet season would follow City of Everett requirements.

• Structural fill placed to construct pavement areas, placed below foundations and slabs, to backfill retaining walls and utility trenches, and placed against foundations would consist of proper material and placed in accordance with recommended techniques.

• Temporary open cuts would be constructed in accordance with the measures identified in Appendix B. The general condition of the slopes would be observed periodically by the geotechnical consultant to confirm adequate stability.

• Perimeter footing drains would be installed around new buildings.

• Below-grade walls and retaining structures would be used to support grade changes of more than 4 feet in height on site where permanent slopes are not feasible. These walls and retaining structures would be designed with the appropriate lateral earth pressures.

• A project-specific geotechnical study would be prepared for the project.

• An environmental study would be completed for the site to identify contaminants in the soil from the Asarco Smelter or other sources and to provide recommendations for soil handling and disposal. Cleanup of this area would occur in accordance with the recommendations in the study before site development.

### 3.1.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts on earth resources are expected with implementation of the mitigation measures listed above.
3.2 WATER RESOURCES

This section of the DEIS describes the water resources on and near the Park District site. Potential impacts from development of the EIS alternatives on water resources are evaluated and mitigation measures identified. This analysis is based on the Earth Report prepared by GeoEngineers in August 2023 (see Appendix B), the Water Resources Report prepared by MIG in August 2023 (see Appendix C), and the Critical Areas Report prepared by GeoEngineers in August 2023 (see Appendix D).

Methodology

The wetland located adjacent to the site was delineated and characterized by the project biologist (see Section 3.3, Plants and Animals, and Appendix D for details).

Stormwater regulation for the Park District project is per the City of Everett Stormwater Code. In order to determine discharge flow for design storms, MGSFlood models for each site basin and each EIS alternative were created and run in accordance with City of Everett requirements and the 2019 Department of Ecology Stormwater Management Manual for Western Washington (2019 SWMWW). (See Appendix C for details.)

Groundwater information is based on a field exploration program that consisted of drilling and sampling 22 borings and excavating and sampling 13 test pits. The borings were drilled to depths ranging between 20½ and 41 feet below existing site grades and the test pits were excavated to depths ranging from 4½ to 8½ feet below the ground surface. Soil samples were evaluated in a laboratory to confirm or modify field classifications, as well as to evaluate engineering properties of the soil. (See Appendix B for details.)

3.2.1 Affected Environment

This sub-section describes the existing water resources and stormwater management facilities on and near the Park District site.

Surface Water

There are no surface water bodies located on the site. The closest surface water feature is an approximately five-acre wetland (Wetland A) located approximately 80 feet to the west of the site. This is a Category II wetland and requires a 100-foot buffer (see Section 3.3, Plants and Animals, and Appendix D for details).

Groundwater

There are no active uses of groundwater on the site or in the vicinity. Groundwater onsite was not encountered in borings (between 20½ to 41 feet deep), but seepage that was observed was likely due to a perched water table atop glacial till soils. As a result, infiltration is likely very low. (See Section 3.1, Earth, and Appendix B for details.)
**Stormwater Management**

The City of Everett’s combined sewer and stormwater⁠¹ area encompasses approximately 6,500 acres (see Figure 3.2-1, Everett Combined Sanitary Sewer / Stormwater Area). There are no known existing capacity constraints within the downstream conveyance system.

The site drainage is comprised of two drainage basins: the East Basin and the West Basin (see Figure 3.2-2, Existing On-site Drainage Basins). Most of the site and adjacent half streets along 12th Street and 14th Street (approximately 16 acres) is in the East Basin; stormwater runoff from this basin flows to the City’s combined sewer system and drains to Trunkline C where the sewer and stormwater is routed south and across the Snohomish River to the Everett Wastewater Treatment Plant, also referred to as Everett Water Pollution Control Facility (EWPCF), for treatment and then is discharged to the Snohomish River. Approximately 0.8 acres of the site west of Poplar Street is in the West Basin; runoff from this basin flows overland across adjacent properties to the off-site wetland.

The site presently contains a combination of both private and public stormwater conveyance facilities. The primary public system for the conveyance of stormwater onsite is the combined sewer system. Stormwater runoff within the site is collected and conveyed to the public combined sewer system within the site by a series of catch basins, inlets, and downspout lines. The combined sewer system leaves the site at multiple locations along 12th Street and 14th Street and eventually enters the combined 48-inch sewer Trunkline C in the northeast corner of the site. (See Figure 3.2-3, Existing On-site Sewer and Stormwater Management System.)

The combined sewer system onsite was built in the 1940s and is in poor condition and is undersized per the current City code. Although large flooding events are uncommon at the site due to the site’s sloping topography, localized flooding and ponding are usual. This is due to aging catch basins and inadequate curb height and street design.

### 3.2.2 Impacts of the Alternatives

An analysis of the potential water resources impacts of Alternative 1, the Proposed Action, is provided below. For the other alternatives, the analyses focus on any differences between impacts of the alternatives and Alternative 1 (other aspects of these alternatives are expected to be similar to Alternative 1).

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¹ A combined sewer and stormwater system carries both wastewater and stormwater in a system of pipes to a treatment plant.
Combined Sanitary Sewer / Stormwater System
Figure 3.2-2
Existing On-site Drainage Basins
Figure 3.2-3
Existing On-site Sewer and Stormwater Drainage System
Alternative 1 - Proposed Action

Development under Alternative 1 would include construction of 1,500 residential units and 70,600 gross square feet (GSF) of non-residential use (retail, civic/service, and office uses) in 15 buildings. Structured parking would be provided. Open space would also be included.

Water Resources
There would be no direct impacts to water resources under Alternative 1, including Wetland A to the west of the site. Construction and operation of the project could result in indirect impacts to Wetland A, particularly related to stormwater quantity and quality. See below for a more complete discussion of the stormwater management features that would be employed to reduce impacts to Wetland A.

Stormwater Management

During Construction
Clearing and grading would be required for construction of Alternative 1. Construction activities could result in temporary impacts to stormwater runoff quality. The primary risk to water quality during construction would be from sediments carried in stormwater from erodible soils (see Section 3.1, Earth, and Appendix B for additional information on the erosion hazard onsite). The potential for erosion and sediment transport to Wetland A during construction would be greatest during wet weather. Pollution from concrete work and construction machinery, as well as accidental spills (i.e., of vehicle fuel and oil) could also impact water quality.

Under Alternative 1, open space and a community garden are proposed within the 100-foot wetland buffer that extends onto the site; however, no construction of buildings or infrastructure would take place in this area. Temporary water quality treatment facilities would be constructed onsite in accordance with the City of Everett requirements and would include Best Management Practices (BMPs) to limit water quality impacts. With the proper use of BMPs and effective accidental spill response planning, significant impacts to water quality and downstream resources during construction are not expected.

Groundwater could be encountered during grading activities and temporary dewatering could be required during construction. With implementation of a temporary stormwater control system, construction BMPS, and dewatering consistent with City of Everett regulations, no significant impacts to groundwater resources are expected during construction of the project.

During Operation
Following construction, new and replacement impervious surface area would be introduced onsite that would increase stormwater runoff rates and volumes, decrease area available for stormwater infiltration, reduce potential for groundwater recharge, and increase pollutant loading in stormwater runoff. Impacts to water quality could result from by-
products of motor vehicles, landscape chemicals, and waste from domestic animals (and associated fecal coliforms).

A permanent stormwater management system would be installed onsite in accordance with the City of Everett Stormwater Code to treat and control stormwater runoff generated by impervious surfaces. The stormwater management system would consist of both public and private infrastructure. The privately-owned portions of the system would include catch basins, detention facilities, inlets, downspouts, footing drains, and private stormwater conveyance pipes that would collect and convey stormwater runoff to a new public separated stormwater system located within the ROW. Flow control would be provided by detention facilities located in the northeast, northwest, southeast, and southwest portions of the site. By using these detention facilities, stormwater discharge to the combined sewer system under Alternative 1 is predicted to decrease from predeveloped conditions. The proposed separated stormwater/sewer system for Alternative 1 would connect to the existing combined sewer Trunkline C in two different locations located in Fir Street and the easement immediately east of Fir Street. All of the ROWs are a part of the East Basin. The permanent stormwater control system for public ROWs improvements under Alternative 1 would include catch basins, inlets, and a new onsite separated storm sewer system. The off-site combined sewer has adequate capacity to handle the stormwater and sanitary sewer flows from the project. (See Figure 3.2-4, Proposed Stormwater Management System – Alternatives 1 and 2).

As mentioned previously, there are two drainage basins onsite: the East Basin and the West Basin. The stormwater control requirements for the two basins would differ. For the East Basin, there are no water quality requirements; however, this basin is subject to applicable flow requirements. The East Basin peak flow rates for a 25 to 100-year storm event return interval, as well as a flow duration of a 10 to 100-year period, would match existing conditions in accordance with City of Everett requirements.

The West Basin does not contribute to the combined sewer and is subject to the typical stormwater requirements for City of Everett which refer to the 2019 SWMMWW. The West Basin flow control requirement would match 50% of the 2-year to 100% of the 50-year discharge. No detention facilities would be required due to the proposed discharge flow being less than existing. Because of under-developed conditions, the impervious surface area would be less than the existing impervious area in this basin. Low Impact Development (LID) techniques would be implemented in the West Basin to help support wetland hydrology, where feasible, and could include pervious pavement for walkways. Runoff would match the existing pattern of overland flow and groundwater infiltration to the off-site wetland. Concentrated flows would be dispersed prior to leaving the site to prevent erosion and sedimentation.

Groundwater is not anticipated to be impacted by the proposed development as no large-scale dewatering is planned. The impervious surface area modifications onsite would not
Proposed Stormwater Management System – Alternatives 1 and 2
impact groundwater levels as little runoff currently reaches the groundwater table via direct surface infiltration.

Overall, no significant adverse impacts to water resources, including Wetland A, are expected during operation of the project with the proposed permanent stormwater management system.

**Alternative 2 - Design Alternative**

Development under Alternative 2 would include the same development program as Alternative 1 (1,500 residential units and 70,600 GSF of non-residential use); however, there would be 17 buildings, two more than under Alternative 1. Structured parking would be provided. Open space would also be included; however, due to the additional building there would be less than under Alternative 1.

**Water Resources**

Like Alternative 1, there would be no direct impacts to water resources (e.g., Wetland A) under Alternative 2. Construction and operation of the project could result in indirect impacts to the wetland related to stormwater quality and quantity.

**Stormwater Management**

Like Alternative 1, construction activities for Alternative 2 could cause temporary impacts to stormwater runoff quality (e.g., from erosion and sedimentation, and pollutants), and runoff quantity (e.g., to wetland hydrology). Groundwater could be encountered during construction activities and temporary dewatering could be required. With implementation of a temporary stormwater control system, construction BMPs, and dewatering, consistent with City of Everett regulations, no significant impacts to water resources are expected during construction of the project.

Following construction, new and replacement impervious surfaces would be introduced with their associated potential for impacts on stormwater quantity and quality. A permanent stormwater control system would be installed in accordance with the City of Everett Stormwater Code, similar to the system described for Alternative 1. The main difference would be that Alternative 2 would include larger building footprints which would result in the loss of the centrally located park. The area of detention facilities required for Alternative 2 would be slightly more than Alternative 1 due to the increased amount of impervious surface area in this area.

**Alternative 3 - No Action**

Under Alternative 3, the No Action Alternative, the site would remain in its existing condition. All the existing buildings and landscaping would remain for the time being, but demolition and removal of the buildings would ultimately occur under a separate action. For analysis purposes in the EIS, the Alternative 3 assumes development under the site’s
existing Comprehensive Plan designation zoning classification and would include a total of up to approximately 458 housing units and no non-residential uses. Parking would be provided in surface lots.

Like Alternatives 1 and 2, there would be no direct impacts to water resources (e.g., Wetland A) under Alternative 3. Construction and operation of the project could result in indirect impacts to the wetland related to stormwater quality and quantity.

There would be a potential for water quality impacts during construction activities. However, these impacts would be less than under Alternatives 1 and 2 because there would be less removal of existing impervious surfaces and less earthwork under Alternative 3.

Following construction, new and replacement impervious surfaces would be introduced onsite with their associated potential for impacts on stormwater quantity and quality. A permanent stormwater control system would be installed in accordance with the City of Everett Stormwater Code. Alternative 3 would provide new private storm lines and facilities that connect to the existing combined sewer infrastructure in 12th or 14th Street which leads to Trunkline C.

**Cumulative Impacts**

There are no known construction projects that are proposed in the site vicinity. Nonetheless, local construction projects could occur at the same time as construction of the Park District project. The potential for these projects to result in impacts to water resources would depend on whether water resources are located on or near the sites. These projects would also be subject to City of Everett stormwater regulations. As a result, no significant impacts on water resources are anticipated from adjacent projects, in combination with the Park District.

**Conclusion**

*No surface water resources are present on the Park District site. An approximate five-acre wetland (Wetland A) is located offsite to the west. The site presently contains a combination of both private and public stormwater conveyance facilities that are undersized and in poor condition. The system drains to the City’s combined sewer/stormwater system.*

*No direct impacts to water resources would occur with construction of Alternatives 1, 2, or 3. During construction activities, stormwater runoff quality and water resources (Wetland A) could be impacted by sedimentation and/or pollutants. Groundwater could also be encountered during construction. A temporary stormwater control system, construction BMPs, and dewatering consistent with City of Everett regulations would be implemented to minimize potential construction impacts. With development of the site, impervious surfaces would be introduced and there would be a potential for water quantity and quality impacts.*
to water resources. A permanent stormwater management system would be installed following construction, in accordance with the City of Everett requirements and significant impacts on water resources are not expected.

3.2.3 Mitigation Measures

The following measures have been identified to address the potential water resource-related impacts from operation of the Park District Project. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state, and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce impacts. Other Possible Measures are additional measures that could be implemented to address impacts but are not necessary to mitigate significant impacts.

Legally-Required Measures

- Temporary erosion and sedimentation control measures and BMPs would be implemented during construction in accordance with the City of Everett Stormwater Code. A Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented as required by the City of Everett and the 2019 SWMMWW. Construction entrances, wheel washes, street cleaning, and other BMPs would be used to prevent the tracking of soils beyond the project limits.

- Impacts of excavation dewatering on groundwater would be controlled with: site-specific design and careful control of dewatering systems, minimizing the extent and duration of dewatering, and reinfilttrating extracted groundwater (see Appendix B for details).

- Any impacts to the off-site wetland (Wetland A) during construction would be minimized as required in the 2019 SWMMWW.

- A hydraulic analysis of the stormwater and wastewater systems would be completed during the design phase of the project to determine necessary improvements to the City's stormwater and wastewater infrastructure. Improvements could include: stormwater flow control facilities.

- The design and construction of the permanent stormwater control system, including conveyance and flow control facilities, would be in accordance with the City of Everett Stormwater Code.
3.2.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts on water resources are expected with implementation of the mitigation measures listed above.
### 3.3 PLANTS AND ANIMALS

This section of the DEIS describes the plant and animal habitat, including critical areas (including wetland and fish and wildlife habitat), that occur on and near the Park District site. Potential impacts from development of the EIS alternatives on plant and animal habitat are evaluated, and mitigation measures identified. This analysis is based on the Critical Areas Report prepared by GeoEngineers in August 2023 (see Appendix C).

**Methodology**

Wetland and fish and wildlife habitat on and in the vicinity of the Park District site were delineated and characterized. The assessment area for evaluating wetlands and fish and wildlife habitat conservation areas (FWHCAs) included the entire site and extended 660 feet from site boundary.

For the wetlands and FWHCA analyses, federal, state, and local environmental maps of the assessment area, and in certain cases beyond, were reviewed. The project biologist conducted a field assessment of the assessment area on April 19, 2023, to evaluate the site for the potential presence of wetlands and FWHCAs.

Evaluation of potential wetland and aquatic habitat was conducted in accordance with guidelines presented in Everett Municipal Code (EMC) Chapter 19.37 – Critical Areas, using the *U.S. Army Corps of Engineers (USACE) Wetlands Delineation Manual* (1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast* (2010). Wetland identifications were based on presence of hydrophytic vegetation, hydric soils, and wetland hydrology. Wetlands were rated according to EMC 19.37.090(C). Regulatory wetland buffers were identified according to EMC 19.37.110(A) and EMC 19.37.110(C) and were based on the wetland category and habitat score from the rating forms.

See Appendix C for details on the methodology for the critical areas analysis.

#### 3.3.1 Affected Environment

This sub-section describes the existing plants and animal habitat that occur on and near the Park District site.

**Plant and Animal Habitat**

Vegetation on the Park District site is comprised of lawn, with scattered ornamental trees and landscape beds. Several larger trees are present onsite (e.g., trees with a diameter at breast height (DBH) of 28 inches or greater). A community garden for Everett Housing Authority (EHA) residents is situated in the northeast corner of the site. The on-site vegetation provides minimal habitat for wildlife.
Wildlife expected to use the assessment area are those typically adapted to the urban environment and that tolerate human activity. Examples include: resident and migratory birds, amphibians and reptiles, and small- and medium-sized mammals such as mice and raccoon.

**Wetland A**

One wetland (Wetland A) was identified within the assessment area. This wetland is located to the west of the Park District site and extends south from Everett Boys and Girls Club baseball field to 15th Street (see Figure 3.3-1, Wetland A). No other wetland features were identified in the data review or field assessment.

Wetland A is an approximately 5.0-acre wetland characterized as a palustrine scrub-shrub and forested system with open water, emergent, scrub-shrub, and forested elements. It is a depressional wetland fed by direct precipitation and high groundwater. The dominant vegetation in the wetland includes: Pacific willow (*Salix lasiandra*), Western redcedar (*Thuja plicata*), hardhack (*Spiraea douglasii*), salmonberry (*Rubus spectabilis*), slough sedge (*Carex obnupta*), and Himalayan blackberry (*Rubus armeniacus*). Wetland A is considered a Category II wetland. Per EMC 19.37.110, a Category II wetland rated with four habitat points requires a standard buffer of 100 feet. Approximately 0.025 acres (1,098 square feet) of Wetland A’s buffer extends onto the site. The buffer area onsite is currently occupied by residences and ornamental landscaping. According to EMC 19.37.110(A), the buffer could be reduced to 75 feet if general mitigation measures are applied. In general, the wildlife species currently using Wetland A and its buffer are adapted to the urban environment and tolerate human activity.

Wetland A received the following function scores, based on the Washington State Wetland Rating Form.

- **Water Quality** (9 points out of 9) – High level for water quality functions by providing surface water treatment (no outlet) in a heavily developed and urban area.
- **Hydrologic** (8 points out of 9) – High to moderate level for hydrologic functions since the wetland has significant water storage and plants that can slow water during flooding events. The wetland also occurs in a landscape with a basin with water quality or flooding problems.
- **Habitat** (4 points out of 9) – The wetland provides low habitat functions due to the lack of accessible, connected habitat. The wetland has two vegetation classes, three hydroperiods, moderate habitat interspersion and little to no invasive vegetation.
- **Buffer Condition** – The wetland buffer has been heavily modified with adjacent residential, commercial, and recreational development. Active roads also further constrain the wetland feature. Within the assessment area, the buffer consists of narrow bands of forested and shrub vegetation.

See Appendix C for details on Wetland A.
Figure 3.3-1

Existing Wetland and Wetland Impacts – Alternatives 1 and 2

*Not to scale
**Fish and Wildlife Conservation Areas**

Per EMC 19.04.110, FWHCAs are defined as:
- Habitats of primary association;
- Streams/riparian corridors;
- Continuous vegetative corridors linking watersheds;
- Significant biological areas listed by the city; and
- Lakes.

Fish and wildlife species presence and habitat use of the assessment area were evaluated through a review of available literature as well as general field observations. The evaluation focused primarily on the data review to identify potential fish and wildlife habitat within the assessment area. The purpose of field observations was to document potential wildlife habitat physical features (for example, snags, nests, burrows, trails, dens, etc.) that would verify other mapped data.

The WDFW PHS database identifies known locations of state and federally listed sensitive species and priority habitats. According to the WDFW PHS mapper, there are no terrestrial sensitive species located within the assessment area. The species list from the USFWS (included in Appendix B to Appendix C) identifies species and critical habitats designated for protection under the U.S. Endangered Species Act (ESA). The USFWS ESA list identifies species and designated critical habitats potentially present within the general vicinity of the assessment area. The USFWS ESA list includes a total of three federally listed species (i.e., marbled murrelet, yellow-billed cuckoo, and bull trout), one proposed listed species (i.e., North American wolverine), and one candidate species (i.e., monarch butterfly \(Danaus plexippus\)) and no designated critical habitats as potentially occurring within the site vicinity based on the location of the site within Snohomish County. However, based on file review and field observations, the occurrence of any of these species within the assessment area or site vicinity is unlikely due to the level of development, degraded habitat conditions, lack of species-specific habitat parameters, and isolation from larger tracts of wildlife habitat. Furthermore, WDFW PHS data do not indicate any documented sightings of these species within one half mile of the assessment area.

During the field investigation, no evidence was observed that priority wildlife species are occupying habitats within the assessment area. There are no large bird nests in the few trees that occur within the Park District site. The field investigation of terrestrial habitats in the assessment area did not document any suitable nesting trees for bald eagles or any active nests.

Marbled murrelet designated critical habitat, which is identified by USFWS as occurring within Snohomish County, is associated with old growth forests, which do not occur on or in the vicinity of the assessment area. Suitable habitat for yellow-billed cuckoo is comprised of contiguous riparian zones with cottonwoods and willow, which do not occur within the assessment area. The assessment area does not contain streams with characteristics suitable for Bull Trout, which are therefore not anticipated to be present at the site. As
such, none of the ESA-listed species are expected to occur at the site or in the assessment area.

### 3.3.2 Impacts of the Alternatives

An analysis of the potential plant and animal habitat impacts of Alternative 1, the Proposed Action, is provided below. For the other alternatives, the analyses focus on any differences between the alternatives and Alternative 1 (other aspects of these alternatives are expected to be similar to Alternative 1).

#### Alternative 1 - Proposed Action

Proposed development under Alternative 1 would consist of a mix of uses with up to 1,500 multifamily residential units and 70,600 gross square feet of non-residential uses (i.e., retail, civic/service, and office) in 15 buildings. An approximately 1.5-acre park would be provided.

#### During Construction

Under Alternative 1, clearing and grading of the site would occur for each of the major phases of development. Vegetation proposed to be removed consists of lawn, and ornamental shrubs and trees which do not provide extensive habitat opportunities for wildlife. Although the Everett Municipal Code does not require that trees be preserved during development, two of the existing larger trees onsite are proposed to be retained under Alternative 1. However, one or both of these trees may be removed if their health dramatically declines, or they do not contribute to the ecology, climate action agenda, or aesthetics of the project.

There would be no direct impacts to any critical habitats, including Wetland A or FWHCAs, with development of Alternative 1. As described in Affected Environment, none of the ESA-listed species identified in Snohomish County are expected to occur at the project site or in the assessment area. Therefore, it is unlikely that Alternative 1 would impact ESA-listed species.

Assuming a regulatory buffer of 100 feet, approximately 0.025 acres (1,098 square feet) of Wetland A’s buffer extends within the proposed project footprint (see Figure 3.3-1). Within the 1,098-square foot buffer impact area, ornamental vegetation would be removed with proposed development and would be replaced with a community garden and open park space, including a multipurpose path. Plantings would include native species of trees, shrubs, and understory plantings to create habitat, and edible plants for EHA residents in the community garden space. Therefore, Alternative 1 would result in an increase in wetland buffer function relative to existing conditions by providing more natural habitat conditions through removal of ornamental vegetation and replacement with native vegetation and edible plants within the community garden space.
Construction activities for Alternative 1 could cause erosion, sedimentation, and pollution of Wetland A without mitigation. However, temporary stormwater control measures would be installed during construction, consistent with City of Everett requirements to address these potential impacts.

**During Operation**

New landscaping would be planted throughout the site under Alternative 1. A total of 1.1 acres of vegetated park area is proposed under Alternative 1. Tree canopy is expected to increase across the site. Landscaping proposed within the area west of Pine Street, including within Wetland A’s buffer, would consist of predominantly native species and open space. Therefore, Alternative 1 is anticipated to increase habitat opportunities on the Park District site post-construction.

Development associated with Alternative 1 would increase activity levels on and in the vicinity of the site. This would result in more vehicular use, human occupancy, and an increase in artificial light which could impact wildlife use of the site and Wetland A. This increase in use of the site would predominantly occur east of Pine Street, well outside of Wetland A’s buffer.

Based on stormwater modeling at the site, Wetland A currently receives stormwater from the “West Basin” of the site, which is in the area west of Pine Street (to the east of Wetland A). Proposed development under Alternative 1 within the West Basin would decrease impervious surfaces relative to existing conditions which would result in a decrease in discharge volume (surface water) to Wetland A. Despite the modeled decrease in discharge to Wetland A, the total volume of water within the West Basin would still be consistent with existing conditions. However, instead of being concentrated from sheet flow associated with impervious surfaces as currently occurs, it would enter the wetland as a combination of groundwater infiltration and surface flows. Alternative 1 would incorporate strategies to further protect the wetland hydroperiod (per the 2019 *Washington State Department of Ecology Stormwater Management Manual for Western Washington* guidance). These hydroperiod protection strategies would include increasing the retention of natural pervious cover, reducing the level of development, reducing the total amount of impervious surfaces, maintaining larger wetland buffer zones, and increasing infiltration. Therefore, no significant impacts on Wetland A’s hydrology are expected. (See Section 3.2, *Water Resources*, and Appendix C for details on the stormwater modeling).

**Alternative 2 - Design Alternative**

The development program under Alternative 2 would be the same as under Alternative 1 except that there would be two more buildings, for a total of 17 buildings. The large approximately 1.5-acre park would not be provided.
During Construction

Under Alternative 2, clearing and grading of the site would occur for each of the major phases of development, similar to Alternative 1. However, more grading is expected due to the two additional buildings. Vegetation proposed to be removed consists of lawn, and ornamental shrubs and trees which do not provide extensive habitat opportunities for wildlife.

There would be no direct impacts to any critical habitats, including Wetland A, with development of Alternative 2. There would be a similar area of wetland buffer impacts (1,098 square feet) buffer impact area as under Alternative 1. Ornamental vegetation would be removed with proposed development and would be replaced with a community garden and open space, including a multipurpose path. Plantings would include native plant species to create habitat, and edible plants for EHA residents in the community garden space. Therefore, Alternative 1 would result in an increase in wetland buffer function.

Construction activities for Alternative 2 could cause erosion, sedimentation, and pollution of Wetland A without mitigation. However, temporary stormwater control measures would be installed during construction, consistent with City of Everett requirements to address these potential impacts.

During Operation

New landscaping would be planted throughout the site under Alternative 2. A total of 0.3 acres of vegetated park area is proposed, versus the 1.1 acres under Alternative 1. There would be no large, centrally located park. Tree canopy is expected to increase across the site. Landscaping proposed within the area west of Pine Street, including in Wetland A’s buffer onsite, would consist of predominantly native species and open space. Therefore, post-construction Alternative 2 is anticipated to increase habitat opportunities on the Park District site.

Like Alternative 1, development associated with Alternative 2 would increase activity levels and light on and in the vicinity of the site which could impact wildlife use of the site and Wetland A. This increase in use of the site would predominantly occur east of Pine Street, well outside of Wetland A’s buffer.

Like Alternative 1, proposed development under Alternative 2 within the West Basin would decrease impervious surfaces relative to existing conditions resulting in a decrease in discharge volume to Wetland A. Despite the modeled decrease in discharge to Wetland A, the total volume of water within the West Basin would still be consistent with existing conditions. However, instead of being concentrated from sheet flow associated with impervious surfaces as currently occurs, it would enter the wetland as a combination of groundwater infiltration and surface flows. Alternative 2 would incorporate strategies to further protect the wetland hydroperiod (per the 2019 Washington State Department of Ecology Stormwater Management Manual for Western Washington guidance). Therefore, no significant impacts on Wetland A’s hydrology are expected.
Alternative 3 - No Action

There would be no direct or indirect impacts to any critical habitats under Alternative 3. The site would remain in its existing condition with all the existing buildings and landscaping remaining for the time being, but demolition and removal of the buildings will ultimately occur under a separate action.

Under Alternative 3, proposed redevelopment of the site could occur in the future, consistent with the site’s zoning. Development could feature approximately 458 multifamily residential units; no non-residential uses would be included.

Under Alternative 3, clearing and grading of the site would occur in one or multiple phases. It is unknown how many of the larger trees onsite could be retained but likely most if not all would be removed. Significantly less grading and potential for erosion, sedimentation, and pollution of Wetland A is expected than under Alternatives 1 and 2. Temporary stormwater control measures would be installed during construction, consistent with City of Everett requirements to address potential construction impacts.

New landscaping would be planted throughout the site under Alternative 3. More of the site would be in open space than under the other alternatives because the parcel west of Poplar Street would be unbuildable due to the required building setbacks. However, no large, centrally located park would be provided. Alternative 3 is anticipated to have a lower activity level from vehicles and humans compared to Alternative 1 and 2. Increased lighting is expected to occur as a result of development. All development activities associated with Alternative 3 would occur east of Pine Street due to building setback requirements, and therefore no development would occur within Wetland A’s buffer. A permanent stormwater management system would be installed per City of Everett requirements to address potential water quality and quantity impacts, including to Wetland A.

Cumulative Impacts

There are no known construction projects that are proposed in the site vicinity. Nonetheless, local construction projects could occur at the same time as construction of the Park District project. The potential for these projects to impact critical areas would depend on whether critical areas are located on or near the site. These projects would be subject to City of Everett critical regulations. As a result, no significant impacts on critical areas are anticipated from adjacent projects, in combination with the Park District.

Conclusion

Vegetation on the Park District site is comprised of ornamental landscaping. Wildlife expected to use the site are those typically adapted to the urban environment. One wetland
(Wetland A) is located to the west of the Park District site. No ESA-listed species are expected to occur on the site or in the site vicinity.

Under all the EIS alternatives, construction activities could cause erosion, sedimentation, and pollution of Wetland A without mitigation. Temporary stormwater control measures would address these potential impacts. Wildlife using Wetland A could be temporarily displaced due to construction noise. Following construction, landscaping would be planted onsite that would improve habitat for wildlife.

None of the EIS alternatives would directly impact Wetland A or FWHCAs; however, Alternatives 1 and 2 would impact a small portion of the Wetland A buffer. This buffer impact could be eliminated with implementation of mitigation. The permanent stormwater management system would address potential water quantity and quality impacts to Wetland A.

3.3.3 Mitigation Measures

The following measures have been identified to address the potential impacts to plants and animals from operation of the Park District Project. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state, and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce impacts. Other Possible Measures are additional measures that could be implemented to address impacts but are not necessary to mitigate significant impacts.

Legally-Required Measures

- Proposed development would comply with local, state, and federal regulations for environmentally critical areas, such as wetlands and protected wildlife habitat areas.

- Temporary stormwater control measures would be installed during construction, consistent with City of Everett requirements to address potential erosion/sedimentation and pollution impacts on Wetland A. These measures would include:
  - Installing and maintaining silt fencing or other measures, as needed, for erosion and sediment control along the perimeter of the wetland buffer.
  - Identifying distinct fueling areas outside the construction area that will be equipped with spill prevention and control devices.

- Trees proposed for preservation and for removal would be clearly marked prior to start of construction. Clearing activities would be confined to the minimum area required.

- Stormwater from the portion of the site west of Poplar Street (the West Basin) which contributes hydrology to Wetland A would adhere to the 2019 Department of Ecology Stormwater Management Manual for Western Washington (SWMMWW).
The project would implement the following mitigation measures from EMC 19.37.110(C) to reduce the buffer on Wetland A from 100 feet to 75 feet:
  o Direct lights away from the wetland.
  o Locate activity that generates noise away from the wetland.
  o Route all new, untreated runoff away from the wetland while ensuring wetland is not dewatered.
  o Establish covenants limiting use of pesticides within one hundred fifty feet of the wetland.
  o Apply integrated pest management.
  o Retrofit stormwater detention and treatment for roads and existing adjacent development.
  o Prevent channelized flow from lawns that directly enters the buffer.
  o Infiltrate or treat, detain, and disperse new runoff from impervious surfaces and new lawn into the wetland buffer.
  o Use privacy fencing; plant dense vegetation to delineate the buffer edge and discourage disturbance using vegetation appropriate for the ecoregion; place the wetland and its buffer in a separate tract.
  o Use best management practices to control dust.

Measures Proposed as Part of the Project

  • Landscaping would be provided throughout the site.
  
  • Two of the existing larger trees onsite are proposed to be retained with proposed development. However, one or both of these trees may be removed if their health dramatically declines, or they do not contribute to the ecology, climate action agenda, or aesthetics of the project.
  
  • Landscaping within wetland buffer would primarily consist of native vegetation.

Other Possible Mitigation Measures

  • Educational signage could be installed along the wetland buffer.

3.3.4 Significant Unavoidable Adverse Impacts

No significant unavoidable impacts on plant and animal habitat are expected with implementation of the mitigation measures listed above.
3.4  AIR QUALITY and GHG EMISSIONS

This section of the DEIS describes the air quality condition on and near the Park District site. Potential impacts from development of the EIS alternatives on air quality are evaluated and mitigation measures identified. The GHG analysis is based on the GHG worksheets prepared by EA in August 2023 (see Appendix E).

Methodology

Existing air quality conditions and potential air quality impacts during construction and operation of the EIS alternatives were qualitatively analyzed. Relevant standards and guidance from U.S. Environmental Protection Agency (EPA), the Washington State Department of Ecology (Ecology), and the Puget Sound Clean Air Agency (PSCAA) are cited.

The SEPA Greenhouse Gas Emissions Worksheet formulated by the City of Seattle was used to estimate the GHG emissions of the EIS alternatives for the lifecycle of development under the EIS alternatives. City of Everett 2015-2035 Comprehensive Plan policies related to climate change and sustainability are discussed.

3.4.1  Affected Environment

This sub-section describes air quality and GHG conditions on and near the Park District site.

Air Quality

Air Quality Regulatory Overview

Air quality is generally assessed in terms of whether concentrations of air pollutants are higher or lower than ambient air quality standards set to protect human health and welfare. Ambient air quality standards are set for what are referred to as "criteria" pollutants (e.g., carbon monoxide - CO, particulate matter, nitrogen dioxide - NO\textsubscript{2}, and sulfur dioxide - SO\textsubscript{2}). Three agencies have jurisdiction over the ambient air quality in the Park District area: EPA, Ecology, and the PSCAA. These agencies establish regulations that govern both the concentrations of pollutants in the outdoor air and rates of contaminant emissions from air pollution sources. Although their regulations are similar in stringency, each agency has established its own standards. Unless the state or local jurisdiction has adopted more stringent standards, EPA standards apply. These standards have been set at levels that EPA and Ecology have determined will protect human health with a margin of safety, including the health of sensitive individuals like the elderly, the chronically ill, and the very young. Ecology and PSCAA maintain a network of air quality monitoring stations throughout the Puget Sound area. In general, these stations are located where there may be air quality problems, and so are usually in or near urban areas or close to specific large air pollution sources. Other stations located in more remote areas provide indications of regional or background air pollution levels. Based on monitoring information for criteria air pollutants
collected over a period of years, Ecology and EPA designate regions as being "attainment" or "nonattainment" areas for particular pollutants. Attainment status is, therefore, a measure of whether air quality in an area complies with the federal health-based ambient air quality standards for criteria pollutants. Once a nonattainment area achieves compliance with the National Ambient Air Quality Standards (NAAQSs), the area is considered an air quality "maintenance" area. The Park District site and surrounding area currently meet all air quality standards.

Existing Air Quality Overview
Existing sources of air pollution in the area include a variety of residential and commercial sources, along with and dominated by local traffic sources. With typical vehicular traffic, the air pollutant that is generated is CO. Other pollutants include ozone precursors (hydrocarbons and nitrogen oxides – NOx), coarse and fine particulate matter (PM10 and PM2.5), and SO₂. The amounts of particulate matter generated by well-maintained individual vehicles are minimal compared with other sources (e.g., a wood-burning stove), and concentrations of SO₂ and NOx are usually not high except near large industrial facilities. Existing air quality in the area currently meets all air quality standards.

GHG Emissions

City of Everett
The City of Everett’s 2015-2035 Comprehensive Plan includes a chapter on Climate Change and Sustainability (Comprehensive Plan Chapter 10) which identifies goals and policies for reducing GHG emissions, including:

- **Goal 10.1** – Improve air quality for present and future generations and reduce the impacts of climate change by reducing GHG emissions.
- **Goal 10.2** – Integrate land use, transportation, urban design, and infrastructure to improve quality of life in the community while increasing densities in transit- and pedestrian-oriented developments in centers and arterial corridors.
- **Policy 10.10** – Expand planning efforts to encourage higher density transit-oriented mixed-use, mixed-income neighborhoods that are attractive, well designed, enable people to move without reliance on automobiles, and contain a variety of recreation, commercial and service opportunities.
- **Policy 10.11** – New development should provide pedestrian connections between retail, living and working places; transit connections; traffic calming and other safety measures; sidewalks; and pedestrian and bicycle amenities, as feasible.
- **Policy 10.14** – Reduce GHG emissions through energy efficiency and use of low-carbon energy sources in buildings and site and infrastructure development. Support the State’s goal to construct energy efficient homes and buildings that achieve the goal of building zero fossil fuel greenhouse gas emission homes and buildings by the year 2031.
3.4.2 Impacts of the Alternatives

An analysis of the potential air quality/GHG impacts of the Park District Project is provided below for the EIS alternatives. For the purposes of this analysis, it is anticipated that potential impacts would be the same under Alternatives 1 and 2 since both alternatives assume the same development program. For Alternative 3, the analysis focuses on any differences between this alternative and Alternatives 1 and 2 (other aspects of Alternative 3 are expected to be similar to Alternatives 1 and 2).

Alternatives 1 and 2

Development of the 16-acre Park District site would include the following land uses under Alternatives 1 and 2:

- **Residential** – up to 1,500 multifamily residential units with approximately 3,645 residents\(^1\);
- **Non-Residential** – up to 70,600 gross sq. ft. (GSF), broken down as follows:
  - Retail – 20,200 GSF,
  - Civic/Service – 26,400 GSF, and
  - Office – 20,000 GSF;
- **Open Space** – approximately 8.5 acres (53%) of the site, including an approximately 1.5-acre publicly accessible park; and
- **Parking** – 1,018 structured parking spaces.

See Table 2-2 for a more complete summary of land uses under Alternative.

**Air Quality**

**Construction**

The development of up to 1,500 multifamily residential units and up to 70,600 sq. ft. of non-residential space (e.g., retail, civic/service, and office uses) would result in localized short-term increases in particulates (dust) and equipment emissions (carbon monoxide) in the vicinity of construction areas. Key construction activities that would cause potential impacts include: excavation, grading, stockpiling of soils, soil compaction, and operation of diesel-powered trucks and equipment (i.e., generators and compressors) on the individual potential development sites. Note that removal of existing pavement and/or buildings could also release particulates and emissions; however, demolition and removal of these features would occur as a separate action, prior to development of the Park District Project. Construction activities would comply with local regulations requiring a plan for dust control during grading activities. However, construction activities could still cause temporary localized fugitive dust impacts at nearby properties.

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\(^1\) The estimate of new residents is based on an average household size in City of Everett of 2.43 persons per household from the *U.S. Census Bureau, American Community Survey (ACS), 5-Year Estimates, 2017-2021.*
Construction activities would require the use of diesel-powered trucks and equipment, which would emit air pollutants that could slightly degrade local air quality in the immediate vicinity of the activity. However, these emissions would be temporary and localized, and the resulting construction tailpipe emissions would be far outweighed by emissions from other existing vehicular traffic in the region.

Some construction activities could cause odors that would be detectable to some people in the vicinity of the activity, especially paving operations using tar or asphalt. Such odors would be short-term and localized. Stationary equipment used for the construction activities must comply with Ecology regulations requiring the best available measures to control emissions of odor-bearing air contaminants.

Construction equipment and material hauling would also temporarily increase traffic flow on streets adjacent to the construction area (see Section 3.10, Transportation, and Appendix H for details). If construction delays traffic enough to significantly reduce travel speeds in the area, general traffic-related emissions would also increase.

**Operation**

Operational air quality impacts associated with residential, retail, civic/service, and office uses under EIS Alternatives 1 and 2 are anticipated to occur from transportation-related sources and building operations (e.g., heating, etc.). Tailpipe emissions from vehicles traveling on public roads would be the major source of air pollutant emissions associated with development of the Park District Project. However, as noted previously, the site and surrounding area currently meets air quality standards for all criteria pollutants and, therefore, it is unlikely that increased traffic would cause localized air pollutant concentrations that could form a “hot spot”. Furthermore, EPA motor vehicle regulations have steadily decreased tailpipe emissions from individual vehicles and continuing decreases from individual vehicle emissions (e.g., due to the transition to electric and hybrid cars) are expected to more than offset the increase in vehicle traffic. Therefore, it is unlikely that air quality impacts at local intersections would be significant.

Air emissions associated with operation of residential, retail, civic/service, and office uses would be generated by natural gas used in the buildings. Under Alternatives 1 and 2, 100% of the energy for the heating and residential appliances would be from electricity rather than from natural gas or other fuel sources that generate greenhouse gases and environmentally hazardous byproducts (natural gas could be used by non-residential uses for cooking and back-up generators). Several other measures are also proposed by the project to promote decarbonization, including: building taller more efficient buildings; locating daily business within walking distance of customers; promoting walking, bicycling, and transit use; and setting a tree canopy goal. Therefore, as described above, the primary source of emissions for retail, civic/service, and office uses would be associated with a greater amount of vehicle traffic (e.g., from residents, employees, customers, and deliveries), and mechanical equipment and trucks at loading docks. As noted, air quality impacts from vehicle emissions are not anticipated to result in a significant impact.
**GHG Emissions**

Climate change is a major global issue. However, it is not possible to discern the impact that GHG emissions from a single development project may have on global climate change. Neither the EPA, State of Washington, nor City of Everett currently have regulations in place to provide guidance on analysis of the impacts of climate change and associated GHG emissions. For the purposes of analysis of the climate change impacts of the EIS alternatives, the *SEPA Greenhouse Gas Emissions Worksheet* formulated by the City of Seattle was used to estimate the emissions footprint of the alternatives for the lifecycle of the development, specifically:

- the extraction, processing, transportation, construction and disposal of materials and landscape disturbance (embodied emissions);
- energy demands created by the development after it is completed (energy emissions); and
- transportation demands created by the development after it is completed (transportation emissions) (see Appendix E for the completed worksheet).

It is estimated that assumed development under Alternative 1 and 2 would generate GHG emissions associated with construction activities (e.g., excavation and grading), production/extraction of construction materials, energy consumption from construction and operation, and vehicle emissions from associated vehicle trips. Table 3.4-1 shows the anticipated lifespan GHG emissions and estimated annual GHG emissions associated with development under Alternatives 1 and 2 including approximately 1,790,575 MTCO$_2$e lifespan emissions and approximately 28,649 MTCO$_2$e annual emissions.

<table>
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<th>Lifespan Emissions (MTCO$_2$e)$^2$</th>
<th>Anticipated Lifespan</th>
<th>Estimated Annual Emissions (MTCO$_2$e)</th>
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<td>1,790,575</td>
<td>62.5</td>
<td>28,649</td>
</tr>
<tr>
<td>No Action, Alternative 3</td>
<td>529,308</td>
<td>62.5</td>
<td>8,469</td>
</tr>
</tbody>
</table>


Note: any inconsistencies in this table are due to rounding.

**Alternative 3 - No Action**

Under Alternative 3, the No Action Alternative, the site would remain in its existing condition. All the existing buildings and landscaping would remain for the time being, but demolition and removal of the buildings would ultimately occur under a separate action. For analysis purposes in the EIS, Alternative 3 assumes development under the site’s existing

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$^2$ MTCO$_2$e is defined as Metric Ton Carbon Dioxide Equivalent which is a standard measure of amount of CO$_2$ emissions reduced or sequestered.
zoning and would include a total of up to approximately 458 housing units and no non-residential uses. Parking would be provided in surface lots.

The No Action Alternative is anticipated to result in similar types of air quality sources as Alternatives 1 and 2 associated with construction and operation of development on the Park District site. The No Action Alternative includes few residences and no non-residential uses and therefore, it is anticipated that the No Action Alternative would result in fewer air quality emissions. However, fewer residences on the site under the No Action Alternative could mean that additional residences (and associated emissions) would be built elsewhere in the City. Table 3.4-1 shows the anticipated lifespan GHG emissions and estimated annual GHG emissions associated with development under Alternatives 3, including approximately 529,308 MTCO₂e lifespan emissions and approximately 8,469 MTCO₂e annual emissions. Overall, construction and operation of Alternative 3 is not expected to result in significant air quality or GHG impacts.

Cumulative Impacts

The City of Everett is currently in the process of updating their Comprehensive Plan. In August 2023, the City Council approved three growth alternatives for analysis as part of the update process, including Alternative 1 – Extend Current Plans, Alternative 2 – Concentrated Growth Pattern, and Alternative 3 – Dispersed Growth Pattern. The City intends to complete the update process in 2024 (see the City of Everett’s website for further details on their Comprehensive Plan Update process). Updates to the Comprehensive Plan could result in the potential for additional development in the vicinity of the Park District site and the potential for these projects to result in impacts to air quality would depend on the nature of the projects. These projects would be subject to applicable federal, state, and local air quality regulations. As a result, no significant impacts on air quality are anticipated from adjacent projects in combination with the Park District. Together with the Park District, any new projects would contribute to climate change, which is a major global issue. Like the Park District, other projects could include decarbonization measures to minimize climate change impacts.

Conclusion

The Park District site and surrounding area currently meet all air quality standards.

Alternatives 1, 2, or 3 would generate air emissions during construction and operation of proposed development of the site, including GHG emissions. Air emissions during construction (e.g., dust and pollutants) would largely be controlled through compliance with City construction regulations. Tailpipe emissions from vehicles traveling on public roads would be the major source of air pollutant emissions associated with operation of the EIS alternatives. However, the site area is located in an attainment area for all criteria pollutants; therefore, it is unlikely that increased traffic would cause localized air pollutant
concentrations (“hot spots”). The EIS alternatives would contribute to GHG emissions; however, the emission increase would be only a small fraction of total statewide annual GHG emissions. No single project emits enough GHG emissions to solely influence global climate change. Therefore, no significant air quality impacts are anticipated.

3.4.3 Mitigation Measures

The following measures have been identified to address the potential air quality impacts from construction and operation of the Park District Project. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state, and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce impacts. Other Possible Measures are additional measures that could be implemented to address impacts but are not necessary to mitigate significant impacts.

**Legally-Required Measures**

- Construction and development would comply with applicable air quality regulations:
  - National Ambient Air Quality Standards (NAAQS);
  - State Ambient Air Quality Standards;
  - City of Everett regulations; and
  - State of Washington GHG laws.

- All contractors would be required to implement air quality control plans for construction activities. Air quality control plans would include BMPs to control fugitive dust and odors such as:
  - Use water sprays or other non-toxic dust control methods on unpaved roadways.
  - Minimize vehicle speed while traveling on unpaved surfaces.
  - Prevent track-out of mud onto public streets.
  - Cover soil piles when practicable.
  - Minimize work during periods of high winds when practicable.

**Measures Proposed as Part of the Project**

- The following mitigation measures would be used to minimize air quality and odors issues caused by construction equipment tailpipe emissions:
  - Maintain the engines of construction equipment according to manufacturers’ specifications.
  - Minimize idling of equipment while the equipment is not in use.
  - If there is heavy traffic during some periods of the day, schedule haul traffic during off-peak times (e.g., between 9:00 AM and 4:00 PM) when it would have the least effect on traffic and would minimize indirect increases in traffic-related emissions.
• The project would promote decarbonization in a number of ways, including by:
  o building taller buildings that would contribute to a compact development that is more energy-efficient and climate-friendly;
  o providing 100% of the energy for the project’s heating and residential appliances from electricity rather than from natural gas or other fuel sources that generate greenhouse gases and environmentally hazardous byproducts (natural gas could be used by non-residential uses for cooking and back-up generators);
  o locating daily services (retail, civic, etc.) in walking distance of many residences;
  o promoting walking, bicycling, and transit use instead of driving; and
  o setting a tree canopy coverage standard.

3.4.4 Significant Unavoidable Adverse Impacts

No significant unavoidable air quality impacts are expected with implementation of the mitigation measures listed above. Climate change and other issues associated with GHG emissions is a major global issue; however, it is not possible to discern the impacts of the GHG emissions from a single development project on climate change. With the proposed measures to promote decarbonization, no significant GHG impacts are expected.
3.5 NOISE

This section of the DEIS describes the noise conditions on and near the Park District site. Potential impacts from development of the EIS alternatives on noise conditions are evaluated and mitigation measures identified. This analysis is based on the Noise Report prepared by Landau Associates in September 2023 (see Appendix F).

Methodology

An analysis of the potential noise impacts of the EIS alternatives were qualitatively addressed for temporary construction noise and long-term (operational) noise from residential development, non-residential (e.g., retail, civic/service, and office), and parks/recreation uses. Noise associated with vehicular traffic on existing roadways and planned project roadways is quantitatively addressed using a screening-level study.

Characteristics of Sound and Noise

For the purposes of this analysis, noise can be described as sound that is undesired, in terms of its loudness (amplitude) and frequency (pitch). Magnitudes of typical noise levels are presented in Table 3.5-1, below.

<table>
<thead>
<tr>
<th>Noise Source</th>
<th>Decibel Level</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jet takeoff at 50 feet</td>
<td>140</td>
<td>Physical pain and immediate injury</td>
</tr>
<tr>
<td>Chain saw, siren at close range</td>
<td>120</td>
<td>Uncomfortably loud</td>
</tr>
<tr>
<td>Loud entertainment venue</td>
<td>105-110</td>
<td></td>
</tr>
<tr>
<td>Motorcycle at 50 feet</td>
<td>95</td>
<td>Very loud</td>
</tr>
<tr>
<td>Noisy urban street</td>
<td>85</td>
<td></td>
</tr>
<tr>
<td>Washing machine or dishwasher</td>
<td>70</td>
<td>Possible annoyance</td>
</tr>
<tr>
<td>Range of normal human speech</td>
<td>50-70</td>
<td></td>
</tr>
<tr>
<td>Average office</td>
<td>50</td>
<td>Quiet</td>
</tr>
<tr>
<td>Refrigerator hum</td>
<td>40</td>
<td></td>
</tr>
<tr>
<td>Whisper, ticking watch</td>
<td>20-30</td>
<td>Barely audible</td>
</tr>
</tbody>
</table>

Sources: HUD 2009; CDC 2019.

Since the human ear is not equally sensitive to sound at all frequencies, a frequency-dependent rating relates noise to human hearing sensitivity. This is called the A-weighted decibel (dBA) scale. This scale accounts for the human perception of a doubling of loudness as an increase of 10 dBA. Therefore, a 70-dBA sound level will sound twice as loud as a 60-dBA sound level. People generally cannot detect differences of 1 to 2 dBA between noise sources of a similar nature (e.g., an increase in traffic noise compared to existing traffic noise); however, under ideal listening conditions, differences of 2 or 3 dBA can be detected by some people. Most people under normal listening conditions would probably perceive a 5-dBA change in noise of a similar nature. However, if an intruding noise is of a different nature than
background noise (e.g., backup alarms in a quiet neighborhood), many people can perceive the intruding noise even if it increases the overall dBA noise level by less than 1 dBA. A measure used to represent the average sound energy occurring over a specified time period is the equivalent sound level (Leq). Leq is the steady-state sound level that would have the same acoustical energy as the time-varying sound that actually occurs during the monitoring period. The 1-hour A-weighted equivalent sound level (Leq 1 h) is the energy average of A-weighted sound levels occurring during a 1-hour period.

When distance is the only factor considered, sound levels from isolated point sources of noise typically decrease by about 6 dBA for every doubling of distance from the noise source. When the noise source is a continuous line, sound levels decrease by about 3 dBA for every doubling of distance. Attenuation of noise at a distance is also affected by the type of intervening ground, with hard/reflective surfaces (e.g., pavement, water) resulting in less attenuation at a distance and soft/absorbent surfaces (e.g., vegetation, fluffy snow), resulting in greater attenuation.

Noise levels at different distances can also be affected by several factors other than the distance from the noise source. Topographic features and structural barriers that absorb, reflect, or scatter sound waves can affect the decreasing noise levels. Atmospheric conditions (wind speed and direction, humidity levels, and temperatures) can also affect the degree to which sound is attenuated over distance.

Echoes from topographical features or buildings can sometimes result in higher sound levels (lower sound attenuation rates) than normally expected. Temperature inversions and altitudinal changes in wind conditions can also refract and focus sound waves toward a location at considerable distance from the noise source. As a result, the existing noise environment can be highly variable depending on local conditions.

**Regulatory Framework**

The Park District site is located Everett and is subject to the noise regulations established by the Everett Municipal Code (EMC). EMC Chapter 20.08 specifies noise limits based on the noise control district of the noise source and receiving property. The code identifies District I as residentially zoned districts, District II as business and commercially zoned districts, and District III as agricultural and manufacturing zoned districts and other nonresidential, nonbusiness and noncommercially zoned districts. The maximum permissible noise levels are shown in Table 3.5-2.

<table>
<thead>
<tr>
<th>District of Sound Source</th>
<th>District of Receiving Property</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>I</td>
</tr>
<tr>
<td>I</td>
<td>55 dBA</td>
</tr>
<tr>
<td>II</td>
<td>57 dBA</td>
</tr>
<tr>
<td>III</td>
<td>60 dBA</td>
</tr>
</tbody>
</table>

*Source: Everett Municipal Code, 20.08.040.*
Between the hours of 10 PM and 7 AM during weekdays, and between the hours of 10 PM and 9 AM on weekends (nighttime hours), the levels in Table 3.5-2 are reduced by 10 dBA for any receiving property within District I.

At any hour of the day or night, for any source of sound that is of short duration, the levels established by this chapter are increased by:

- 5 dBA for a total of 15 minutes in any hour;
- 10 dBA for a total of 5 minutes in any hour; and
- 15 dBA for a total of 1.5 minutes in any hour.

These allowed sound level exceedances can be described in terms of the percentage of time a certain level is exceeded, using statistical noise descriptors ($L_n$s). For example, $L_{25}$ represents a sound level that is exceeded 25% of the time, or 15 minutes in an hour. The maximum permissible noise levels identified in Table 3.5-2 are represented by the $L_{25}$. Similarly, $L_{8.33}$ and $L_{2.5}$ are the sound levels that are exceeded 8.33 and 2.5% of the time, or 5 and 1.5 minutes in an hour, respectively. At no time can the allowable sound level be exceeded by more than 15 dBA, represented by the $L_{\text{max}}$ (maximum noise level).

Noise originating from temporary construction sites and received in a District I (residential) property is exempt from the noise limits described above between 7 AM and 10 PM on weekdays and between 8 AM and 6 PM on weekends and holidays. When that noise is received in a District II (business/commercial) or III (agricultural/industrial) property, the exemption applies between 7 AM and 10 PM on weekdays and 9 AM and 10 PM on weekends and holidays (EMC 20.08.100).

EMC 20.08.150 allows the City to issue variances in cases where exceedance of the thresholds cannot be avoided.

**Traffic Noise**

Noise from vehicles operating on public highways is exempt from the limits identified in Table 3.5-2. Noise emitted from individual vehicles is subject to vehicle-specific noise limits established in EMC 20.08.060 and 20.08.070 and to restrictions regarding alterations, mufflers, and exhaust systems, and driving activities that cause vehicles to exceed noise thresholds established in EMC 20.08.080.

Although Everett has no noise limits applicable to general traffic noise on public roadways, the Federal Highway Administration (FHWA) Noise Abatement Criteria (NAC), and Washington State Department of Transportation’s (WSDOT’s) implementation of these criteria provide a means to consider traffic noise. The FHWA NAC are not applicable to this project because no FHWA project or funding is proposed; however, they are presented here as quantitative noise thresholds for evaluating the impacts of traffic noise on receivers within the study area.
The NAC identifies noise levels for various land-use categories to determine whether traffic noise impacts would occur. The NAC for residential areas, schools, active sport areas, parks, and trails is a level “approaching or exceeding” 67 dBA at exterior use locations, and WSDOT defines a peak-hour traffic noise level impact criterion of 66 dBA. Consistent with the NAC, WSDOT defines a traffic noise impact as either of the following:

- Peak-hour traffic noise level of 66 dBA (Leq) or greater at the exterior outdoor use area of any existing or future dwelling; and
- Increase in peak-hour traffic noise of 10 dBA Leq or greater (future project level minus existing level) at the exterior outdoor use area of any existing dwelling (considered a “substantial increase”).

### 3.5.1 Affected Environment

This sub-section describes the existing land uses, zoning, and noise sources on and near the Park District site.

**Existing Land Use and Zoning**

The site and land immediately to the north and south are zoned Urban Residential 3 (UR3); a small area to the south of the site’s panhandle is zoned R2. Land to the east and west of the project site is zoned Single Family Detached Medium Density (R2), with a limited area to the east zoned UR3. Land adjacent to the northwest of the site is zoned Urban Residential 4 (UR4); (See Figure 3.6-3, Zoning Map, in Section 3.6, Land Use). All zoning within the study area is considered District I, as described in Methodology.

The comprehensive plan designation for the project site and land to the north and south is “Multifamily”; a small area to the south of the site’s panhandle designated single “Single Family”. Property to the east and west of the project site is designated “Single Family,” with a limited area to the east designated “Multifamily”. (See Figure 3.6-2, Comprehensive Plan Map, in Section 3.6, Land Use).

The following non-residential uses surround the site: Hawthorne Elementary School and the Everett Boys and Girls Club to the northwest; Wiggums Hollow Park to the north; Bailey AME Church to the northeast; and Baker Community Center to the southwest. All other land adjacent to the site is developed with residences. (See Figure 3.6-1, Existing Land Uses, in Section 3.6, Land Use).

**Existing Traffic**

The site is bounded by 12th Street to the north and 14th Street to the south, although the easternmost portion of the site extends south of 14th Street to 15th Street. The site extends from just beyond Poplar Street on the west to just beyond Fir Street on the east.
According to the transportation study conducted for this DEIS (see Appendix H), through-streets within approximately 500 feet of the site are two-lane streets with speed limits between 20 and 30 miles per hour (mph). Peak hour traffic volumes range from approximately 50 to 200 vehicles per hour.

Broadway (approximately 1,500 feet west of the site) and East Marine View Drive (approximately 650 feet east of the site) are each major arterials with posted speed limits of 35 mph and 30 mph, respectively, and peak-hour traffic ranging from approximately 1,000 to 2,000 vehicles per hour.

**Baseline Sound Level Measurements**

In 2020, a noise study was prepared for the Baker Heights (now known as Madrona Square) project, located immediately south of the Park District site. For the noise study, baseline noise monitoring was conducted within the Baker Heights/Madrona Square project area. Traffic volumes during April 2020 would have been lower than typical due to COVID-19 restrictions in place at the time; however, the noise environment at Baker Heights/Madrona Square is considered comparable to that of the Park District area.

**Long-Term Sound Level Measurements**

Three long-term measurements were taken on the Park District site and adjacent Madrona Square site using sound level meters mounted on the roofs of existing structures at the locations shown on Figure 3.5-1. Noise was measured for 120 hours between April 4 and April 8, 2020, and the resulting measured levels are summarized in Table 3.5-3.

<table>
<thead>
<tr>
<th>Monitoring Location</th>
<th>Leq, dBA</th>
<th>Lmax, dBA</th>
<th>Lmax noise sources</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAL-1</td>
<td>43-57</td>
<td>53-79</td>
<td>Train traffic, motorcycles, trucks, aircraft, gunshots</td>
</tr>
<tr>
<td>NAL-2</td>
<td>44-59</td>
<td>56-83</td>
<td>Train traffic, motorcycles and trucks, aircraft, gunshots, power saw</td>
</tr>
<tr>
<td>NAL-3</td>
<td>43-59</td>
<td>53-84</td>
<td>Train traffic, motorcycles and cars, aircraft, birds</td>
</tr>
</tbody>
</table>


The dominant noise source was observed to be road traffic from passenger and delivery vehicles. Additional noise sources were reported to include train horns and small-propeller aircraft flyovers.

**Short-Term Sound Level Measurements**

Five short-term sound level measurements were taken at the Madrona Square site, at the locations shown on Figure 3.5-1. The measured short-term sound levels are shown in Table 3.5-4.
Sound Level Measurement Locations


Figure 3.5-1

Legend
- Sound Level Measurement Location
- Modeled Roadway Segments
- Project Site

Base Map Source: Esri World Imagery, 2023; Sound Level Measurement Source: A3 Acoustics, 2020

Note
1. Black and white reproduction of this color original may reduce its effectiveness and lead to incorrect interpretation.
Residential automobile traffic and distant automobile traffic were typical short-term noise sources.

### Table 3.5-4
**SHORT-TERM SOUND LEVEL MEASUREMENTS**

<table>
<thead>
<tr>
<th>Measurement Location</th>
<th>Leq, dBA</th>
<th>Lmax, dBA</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location A</td>
<td>41</td>
<td>60</td>
<td>Minimal residential automobile traffic; birds chirping; distant freeway noise audible</td>
</tr>
<tr>
<td>Location B</td>
<td>53</td>
<td>76</td>
<td>Limited residential automobile traffic; one distant propeller plane</td>
</tr>
<tr>
<td>Location C</td>
<td>44</td>
<td>62</td>
<td>Limited residential automobile traffic; pedestrians passing by; neighbors talking/noise in the distance</td>
</tr>
<tr>
<td>Location D</td>
<td>48</td>
<td>73</td>
<td>Light rain; birds; a distant plane; limited residential automobile traffic; a loud motorcycle passing by (73 dBA Lmax)</td>
</tr>
<tr>
<td>Location E</td>
<td>42</td>
<td>51</td>
<td>Light rain; automobile traffic in distance</td>
</tr>
</tbody>
</table>

*Source: A3 Acoustics, 2020.*

#### 3.5.2 Impacts of the Alternatives

An analysis of the potential noise impacts of Alternative 1, the Proposed Action, is provided below. For the other alternatives, the analyses focus on any differences between impacts of the alternatives and Alternative 1 (other aspects of these alternatives are expected to be similar to Alternative 1).

**Alternative 1 – Proposed Action**

Alternative 1 represents the Applicant’s proposed development of the Park District site. The approximately 16-acre site would be developed in the following land uses:

- **Residential** – up to 1,500 multifamily residential units;
- **Non-Residential** – up to 70,600 gross sq. ft. (GSF), broken down as follows:
  - Retail – 20,200 GSF;
  - Civic – 26,400 GSF; and
  - Office – 20,000 GSF.
- **Open Space** – approximately 8.5 acres (53%) of the site, including an approximately 1.5-acre publicly accessible park.
- **Parking** – 1,018 structured parking spaces.

**During Construction**

Under Alternative 1, clearing and grading would take place, and new infrastructure and buildings would be constructed. Construction activities would be accompanied by temporary increases in noise due to the use of heavy equipment and hauling of construction materials. Noise impacts would depend on the background sound levels, the type of construction equipment being used, and the amount of time construction equipment is in use.
As noted in *Methodology*, noise originating from temporary construction sites and received in a District I (residential) property is exempt from the noise limits described above between 7 AM and 10 PM on weekdays and between 8 AM and 6 PM on weekends and holidays. When that noise is received in a District II or III property, the exemption applies between 7 AM and 10 PM on weekdays and 9 AM and 10 PM on weekends and holidays (EMC 20.08.100).

Construction noise could have a temporary, localized impact on nearby residences, an office, a church, schools, and parks. However, due to the temporary nature of the noise and the restriction of construction activities to daytime hours, any impacts are expected to be less than significant.

**During Operation**

Noise sources associated with residential and outdoor uses include human voices and activity and maintenance work. Although the residential development would be denser under Alternative 1 than past residential uses on the site, the types and overall levels of noise would be similar to levels produced with past uses, controlled by the residential zoning noise limits applied to the site, consistent with the current zoning, and any resulting noise impacts would be less than significant.

In addition to the residential and outdoor uses, Alternative 1 would include an approximately 1.5-acre park. Similar to residential uses, parks can produce noise associated with maintenance activities and human voices and activity. Noises associated with the proposed park would be similar to noise produced at the Everett Boys and Girls Club west of the site, and Wiggums Hollow Park north of the site, which are considered consistent with and appropriate for residential land uses, and any noise impacts would be less than significant.

Alternative 1 would also include non-residential uses, such as retail, civic/service, and office, similar to small businesses and offices already present in the vicinity (e.g., the Baker Community Center, Everett Housing Authority offices, and Ron’s Market on 16th Street and Baker Avenue). Noise sources associated with such uses generally include a greater amount of vehicle traffic (employees, customers, and delivery truck traffic), discussed separately below, in addition to mechanical equipment (such as commercial boilers and heating units). Although specific non-residential uses are not currently identified, any nonresidential uses are expected to be small and intended to complement residential development. Such uses are highly localized and subject to the noise limits described in *Methodology*. The EMC defines noise control districts based on the zoning of the noise source and receiving properties. Because the project area and adjacent properties will still be zoned for residential use with the Planned Development Overlay, the District I noise limits (55 dBA during daytime hours and 45 dBA during nighttime hours) would be applicable to any non-residential use in the project area, which would minimize any potential for significant noise impacts from such uses. Depending on the commercial uses planned, a focused noise study could be required to ensure that all activities and equipment on the site demonstrate compliance with the local noise limits.
Local Roadway Noise

Alternative 1 would result in increased traffic on local roadways, within and around the site. Residential traffic on local roads would include residents and visitors entering, leaving, and traveling within the site. Under Alternative 1, traffic would also be associated with non-residential uses, including employees, customers, and delivery and service vehicles entering, leaving, and traveling within the site area.

For this assessment, potential traffic noise impacts caused by increased traffic from Alternative 1 on the following road segments (shown on Figure 3.5-1), were evaluated for existing homes and noise-sensitive receivers (land uses sensitive to noise, such as residences):

- 12th Street between N Broadway Avenue and Poplar Street;
- 12th Street between Fir Street and E Marine View Drive;
- Baker Avenue between 15th Street and 16th Street;
- Pine Street south of 15th Street;
- 16th Street between N Broadway Avenue and Baker Avenue; and
- 16th Street between Walnut Street and Baker Avenue.

Peak-hour (weekdays between 4:00 to 5:00 PM) traffic volumes along these streets in the site vicinity projected for Alternative 1 (as well as Alternative 2 and 3), are listed in Table 3.5-5. Heavy truck volume was estimated to be 5% of total traffic volume.¹

### Table 3.5-5
WEEKDAY PEAK-HOUR AUTOMOBILE AND HEAVY TRUCK TRAFFIC VOLUMES IN PROJECT VICINITY

<table>
<thead>
<tr>
<th>Road Segment Description</th>
<th>Automobile Volume (Truck Volume)</th>
<th>Alternative 1 and Alternative 2 – 2035</th>
<th>No Action (2035)</th>
</tr>
</thead>
<tbody>
<tr>
<td>12th Street between N Broadway Avenue and Poplar Street</td>
<td>431 (23)</td>
<td>271 (14)</td>
<td></td>
</tr>
<tr>
<td>12th Street between E Marine View Drive and Fir Street</td>
<td>359 (19)</td>
<td>195 (10)</td>
<td></td>
</tr>
<tr>
<td>Baker Avenue between 16th Street and 15th Street</td>
<td>126 (7)</td>
<td>60 (3)</td>
<td></td>
</tr>
<tr>
<td>Pine Street, south of 15th Street</td>
<td>190 (10)</td>
<td>9 (0)</td>
<td></td>
</tr>
<tr>
<td>16th Street between Broadway Avenue and Baker Avenue</td>
<td>633 (33)</td>
<td>661 (35)</td>
<td></td>
</tr>
<tr>
<td>16th Street between Walnut Street and Baker Avenue</td>
<td>539 (28)</td>
<td>634 (33)</td>
<td></td>
</tr>
</tbody>
</table>


The FHWA Traffic Noise Model Version 3.1 was used to predict existing and future noise levels during peak hours under the screening-level assumptions listed in Appendix F. Table 3.5-6 lists the modeled daytime \( L_{eq} \) noise levels at each representative receiver location for Alternative 1 (as well as Alternatives 2 and 3).

¹ Heffron, 2023.
As discussed in *Methodology*, the FHWA NAC are not applicable to this project; however, they are useful as quantitative noise thresholds for evaluating the impacts of traffic noise on receivers within the study area. The modeled peak-hour traffic noise increase at full buildout of Alternative 1 would not meet or exceed the WSDOT peak-hour traffic noise level impact criterion of 66 dBA at any location (see Tables 3.5-3, 3.5-4, and Figure 3.5-1). Because modeled traffic noise levels for Alternative 1 are below the noise level impact criterion of 66 dBA for all modeled road segments, noise impacts would not be considered significant.

Modeled peak-hour traffic volumes occur during daytime hours, when higher noise levels are expected and generally less obtrusive. Traffic volumes during nighttime hours, when people are more sensitive to noise, would be lower than the traffic volumes modeled, resulting in lower noise levels.

### Table 3.5-6
ESTIMATED TRAFFIC-RELATED NOISE LEVELS

<table>
<thead>
<tr>
<th>Road Segment Description</th>
<th>Alternative 1 &amp; Alternative 2 (2035)</th>
<th>Alternative 3 No Action (2035)</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>12th St. between N Broadway Avenue and Poplar St.</td>
<td>62</td>
<td>58</td>
<td>4</td>
</tr>
<tr>
<td>12th St. between E Marine View Dr. and Fir St.</td>
<td>62</td>
<td>59</td>
<td>3</td>
</tr>
<tr>
<td>Baker Ave. between 16th St. and 15th St.</td>
<td>57</td>
<td>54</td>
<td>3</td>
</tr>
<tr>
<td>Pine St., south of 15th St.</td>
<td>59</td>
<td>52 (41)a</td>
<td>7</td>
</tr>
<tr>
<td>16th St. between Broadway Ave. and Baker Ave.</td>
<td>64</td>
<td>64</td>
<td>0</td>
</tr>
<tr>
<td>16th St. between Walnut St. and Baker Ave.</td>
<td>63</td>
<td>64</td>
<td>-1</td>
</tr>
</tbody>
</table>

*Source: Landau Associates, 2023.*

52 dBA is the average measured sound level at NAL-1 between 4:00 PM and 5:00 PM over 5 days. 41 dBA represents the modeled traffic noise at this location, which does not include noise from other roadways or other background noise sources.

**Alternative 2**

Development under Alternative 2 would include the same development program as Alternative 1 (1,500 residential units and 70,600 GSF of non-residential use). Open space would be included throughout the site; however, no large centrally located park would be provided. The phasing of development is expected to be similar to Alternative 1. Noise during construction and operation would be like described for Alternative 1. However, there would be more grading and associated noise due to the excavation for two additional buildings. The modeled peak-hour traffic noise increase at full buildout would not meet or exceed the WSDOT peak-hour traffic noise level impact criterion of 66 dBA at any location (see Tables 3.5-3, 3.5-4, and Figure 3.5-1). Overall, noise impacts associated with Alternative 2 would not be considered significant.

**Alternative 3 - No Action**

Under Alternative 3, the No Action Alternative, the site would remain in its existing condition. All the existing buildings and landscaping would remain for the time being, but demolition and removal of the buildings would ultimately occur under a separate action. For analysis purposes...
in the EIS, Alternative 3 assumes development under the site’s existing zoning and would include a total of up to approximately 458 housing units and no non-residential uses.

The No Action Alternative would include fewer multi-family residences than Alternatives 1 and 2 and would not provide non-residential use or a large publicly accessible park.

Construction and its associated noise could end sooner than under Alternatives 1 and 2 because fewer buildings would be built. Operational noise associated with Alternative 3 would be similar to the residential noise expected with Alternatives 1 and 2; however, less noise would be expected due to a lower density of residential units. The modeled peak-hour traffic noise increase at full buildout would not meet or exceed the WSDOT peak-hour traffic noise level impact criterion of 66 dBA at any location (see Tables 3.5-3, 3.5-4, and Figure 3.5-1). Overall, noise impacts associated with Alternative 3 are not considered significant.

**Cumulative Impacts**

The City of Everett is currently in the process of updating their Comprehensive Plan. In August 2023, the City Council approved three growth alternatives for analysis as part of the update process, including Alternative 1 – Extend Current Plans, Alternative 2 – Concentrated Growth Pattern, and Alternative 3 – Dispersed Growth Pattern. The City intends to complete the update process in 2024 (see the City of Everett’s website for further details on their Comprehensive Plan Update process). Updates to the Comprehensive Plan could result in the potential for additional development in the vicinity of the Park District site and the potential for these projects to result in noise impacts would depend on the nature of the projects and their potential to generate noise. These projects would be subject to City of Everett noise regulations. As a result, no significant noise impacts are anticipated from adjacent projects, in combination with the Park District.

**Conclusion**

*Development under EIS Alternatives 1, 2, or 3 would result in additional noise onsite and in the site vicinity. Temporary construction noise would occur over the course of development of the Park District site. Construction-related noise would be greater under EIS Alternatives 1 and 2 than under Alternative 3 due to: the longer construction period, and the greater amount of residential and non-residential development. The primary source of noise during operation of the project would be from vehicular traffic. Noise level increases modelled for each of the EIS alternatives were below the significance threshold of impact criterion of 66 dBA for all modeled road segments. With implementation of the mitigation measures listed below, no significant noise impacts are expected.*

### 3.5.3 Mitigation Measures

The following measures have been identified to address the potential transportation impacts from operation of the Park District Project. These measures apply to all the alternatives unless
otherwise noted. **Legally-Required Measures** are measures that are required by code, laws or local, state, and federal regulations to address significant impacts. **Measures Proposed as Part of Project** are measures incorporated into the project to reduce impacts. **Other Possible Measures** are additional measures that could be implemented to address impacts but are not necessary to mitigate significant impacts.

**Legally-Required Measures**

- City of Everett noise regulations would be followed that require limiting construction activities to between the hours 7 AM and 10 PM on weekdays and between 8 AM and 6 PM on weekends and holidays when noise is received in a District I property, or between 7 AM and 10 PM on weekdays and 9 AM and 10 PM on weekends and holidays when that noise is received in a District II or III property.

**Other Possible Measures**

- To reduce construction noise at nearby receivers, the following mitigation measures could be incorporated into construction plans and contractor specifications:
  - Locate stationary equipment away from receiving properties;
  - Erect portable noise barriers around loud stationary equipment located near sensitive receivers;
  - Turn off idling construction equipment;
  - Require contractors to rigorously maintain all equipment; and,
  - Train construction crews to avoid unnecessarily loud actions (e.g., dropping bundles of rebar onto the ground or dragging steel plates across pavement) near noise-sensitive areas.

- Noise associated with vehicle traffic is positively correlated with vehicle speed. Roadway design and traffic calming measures within the project site and on approaching roadways could reduce vehicle speed and associated noise.

- Some of the proposed commercial or civic/service uses could introduce mechanical equipment that could potentially exceed local noise limits. Such uses could require a focused noise study to ensure that all activities and equipment on the site demonstrate compliance with the local noise limits.

**3.5.4 Significant Unavoidable Adverse Impacts**

With implementation of the mitigation measures listed above, no significant noise impacts are expected.
3.6 LAND USE / RELATIONSHIP TO PLANS and POLICIES

This section of the DEIS describes the land use conditions on and near the Park District site. Potential impacts from development of the EIS alternatives on land use are evaluated and mitigation measures identified. The relationship of the EIS alternatives to relevant land use plans, policies, and regulations is also discussed.

Methodology

The land use analysis was prepared based on a land use reconnaissance of the site and vicinity conducted on April 14, 2023. Pertinent federal, state, regional, and local land use plans, policies, and regulations were reviewed for the relationship to plans and policies discussions.

3.6.1 Affected Environment

This sub-section describes the existing land use conditions on and near the Park District site.

Site

Existing Uses
The Park District site is currently vacant and occupied by EHA’s former Baker Heights affordable housing development. There were 45 vacant, single story, multifamily residential buildings within the Park District site. Two of these buildings were demolished and removed with the Madrona Square development. EHA has separate plans to demolish and remove the remaining buildings. A total of 244 individual multifamily residential units were included in the buildings on the Park District site and Madrona Square site to the south (both owned by EHA). Other site improvements on the site include paved parking, pathways, and playgrounds. (See Figure 2-4, Existing Site Conditions in Chapter 2.) Under existing conditions, approximately 8.2 acres (51% of the site) are in built area and 7.8 acres (49% of the site) are in natural/landscape area (see Table 2-1 in Chapter 2 for details).

Existing Land Use Designation, Zoning Classification, and Critical Areas
The site is currently designated as Residential, Multifamily in the City of Everett Comprehensive Plan (2015-2035) (see Figure 3.6-1, Existing Comprehensive Plan Designation Map). The multifamily designation is applied to areas near public transit facilities or along transit corridors, near employment areas, or between higher intensity uses, such as commercial or industrial development to provide a buffer for single family neighborhoods. This designation is applied to areas that are not disruptive of existing single-family neighborhoods and are already developed with a significant amount of multifamily
Figure 3.6-1

Comprehensive Plan Designation Map

Source: City of Everett, 2023.
housing. Residential densities range from fifteen (15) units per gross acre to unlimited. No more than 95% lot coverage, and buildings up to 10 stories are permitted. The Comprehensive Plan Designation on properties to the north, south, and along a portion of the east site boundary are also Multifamily. The properties along the remaining site boundaries are designated Single Family. (See Figure 3.6-1.)

The site is presently zoned Urban Residential 3 (UR3) (see Figure 3.6-2, Existing Zoning Classification Map). The primary purpose of the UR3 zone is to provide for multiple family residential use at medium densities. In this zone, commercial uses are generally prohibited. There is no maximum density except in historic overlay zones (the site is not located in an historic overlay zone). The maximum height limit is four floors. The zoning on properties to the north, south, and along a portion of the east site boundary is also UR3. Properties along the remaining site boundaries are Single Family Detached Low Density. To the northeast, is Urban Residential 4 (UR4 zoning). (See Figure 3.6-2.) Existing maximum building heights in the City are presented on Figure 3.6-3. As shown, the maximum building height on the Park District site is four floors.

Based on the City of Everett GIS maps, the site is located within the Asarco smelter contamination area. There is a small area of contamination in the northwest corner of the site that will require cleanup prior to site development. (See Section 3.1, Earth, and Appendix B, for details.)

Site Vicinity

The Park District site is located in the Delta neighborhood in northeast Everett. The site vicinity is comprised of residential, school, church, community center, and open space/recreational uses. Uses immediately adjacent to the site include:

- **North** – multifamily residential use (12 Pines Apartments) and a park (Wiggums Hollow Park), beyond 12th Street; **Northwest** – Hawthorne Elementary School and **Northeast** – a mobile home park, both beyond 12th Street;
- **East** – single-family residential use; **Northeast** – a church (Bailey AME Church);
- **South** – multifamily residential use (Everett Housing Authority’s (EHA’s) Madrona Square), beyond 14th Street, and single-family residential use, beyond 15th Street; **Southwest** – a community center (EHA’s Baker Community Center) and multifamily residential use (EHA’s Bakerview Apartments), both beyond 14th Street; and
- **West** – single-family residential use, open space (including a wetland).

See Figure 3.6-4, Existing Land Uses, for details.
Figure 3.6-3
Existing Maximum Building Heights
Park District Project
Draft EIS

Figure 3.6-4
Existing Land Use Map


Note: This figure is not to scale
3.6.2 Impacts of the Alternatives

An analysis of the potential land use impacts of Alternative 1, the Proposed Action, is provided below. For the other alternatives, the analyses focus on any differences between the alternatives and Alternative 1 (other aspects of these alternatives are expected to be similar to Alternative 1).

Alternative 1 - Proposed Action

Alternative 1 represents the Applicant’s proposed development of the Park District site. The approximately 16-acre site would be developed in the following land uses:

- **Residential** – up to 1,500 multifamily residential units;
- **Non-Residential** – up to 70,600 gross sq. ft. (GSF), broken down as follows:
  - Retail – 20,200 GSF;
  - Civic/Service – 26,400 GSF; and
  - Office – 20,000 GSF.
- **Open Space** – approximately 8.5 acres (53%) of the site, including an approximately 1.5-acre publicly accessible park.
- **Parking** – 1,018 structured parking spaces.

A total of 15 buildings would be constructed, four to a maximum of 15 stories in height.

See Chapter 2, including Table 2-1 and Figure 2-10, for a more complete summary of land uses under Alternative 1.

A breakdown of the site area under Alternative 1 is presented in Table 2-3 in Chapter 2. As shown, approximately 12.4 acres (78% of the site) would be covered in built areas and 3.5 acres (22% of the site) would be in natural/landscape areas at buildout. More of the site would be in built areas than under existing conditions; however, the natural/landscape areas would be consolidated into the central portion of the site to create a large, publicly accessible park (totaling approximately 1.5 acres of built and natural park areas).

Direct Construction Impacts

Conversion of Land Use

Proposed development under Alternative 1 would convert a vacant, low-density multifamily residential development into a mixed-use development including medium- and high-density multifamily residential, retail, civic/service, and office uses, as well as open space.

Other Construction Impacts

Development of the residential and non-residential uses in the Park District under Alternative 1 would occur in multiple phases, potentially beginning in 2024 and ending in 2035 (see Table 2-4 in Chapter 2 for details on the phasing of development onsite under Alternative 1).
Site preparation and construction of infrastructure and buildings under Alternative 1 could result in periodic, temporary impacts to adjacent land uses over the assumed buildout of the site. Construction-related impacts would include general increases in activity levels; additional amounts of air pollution due to dust and emissions from construction equipment and vehicles; increased noise levels and odors from construction activities; vibration associated with construction activities and vehicle movement; and increased traffic associated with construction vehicles and construction workers. Although construction activities would occur incrementally over the approximately 12-year buildout of the site, such activities would move around the site and could result in temporary impacts to adjacent land uses when construction occurs near the boundary of the site or in close proximity to those adjacent uses (see Section 3.4, Air Quality/Greenhouse Gas Emissions, Section 3.5, Noise, and Section 3.10, Transportation for details).

The land uses surrounding the site that could be impacted during construction include: the existing elementary school to the northwest, the park to the north, multifamily residential uses to the north and south, single-family residential uses to the east, south, west, and a church to the northeast. Construction impacts on surrounding uses would be minimized by existing topography (particularly to the west), separation by existing roadways (e.g., 12th Street, Fir Street, Pine Street, 14th Street, and 15th Street), and adherence to City construction regulations.

Overall, construction-related impacts to off-site land uses would be temporary in nature and with implementation of the identified mitigation measures, significant adverse impacts on surrounding land uses are not anticipated.

**Direct Operation Impacts**

**Transition to More Intense Land Uses**

Proposed development under Alternative 1 would represent a transition of the Park District site from a less intensive former low-density multifamily residential development to a more intensive mixed-use development, including medium and high-density residential uses and non-residential uses. The transition in uses would occur in an incremental, phased manner.

Up to 15,000 residential units in a total of 15 buildings would be constructed under Alternative 1, four to a maximum of 15 stories in height. Fifteen-story buildings are not allowed by the site’s current Residential, Multifamily land use designation and UR3 zoning classification, and would require approval of a Comprehensive Plan text amendment and Planned Development Overlay (PDO). At total of to 70,600 GSF of non-residential uses area proposed, all would be “neighborhood commercial” in character. Non-residential uses are not allowed by the existing UR3 zoning and would also require approval of a PDO. See Section 3.8, Aesthetics / Light and Glare, for a discussion of the height, bulk, and scale impacts of Alternative 1.
A large portion of the site – approximately 8.5 acres (53%) of the total site area – would be provided in open space. The open space would consist of built and natural open space areas. Approximately 76% of the open space would be publicly accessible (e.g., the main centrally located park and pathways/sidewalks throughout the site) and 24% in private/semi-private open space for project residents and employees (e.g., building courtyards, entry yards for the townhouses, community garden, and play areas). The range of proposed land uses and their densities could result in potential land use impacts including increases in activity levels and land use incompatibilities, which often follow from more intensive land uses. It is assumed that proposed development regulations, and EIS mitigation measures adopted as conditions of approval, would minimize potential land use incompatibility impacts onsite and between the site and adjacent areas. As a result, no significant land use transition impacts are anticipated.

**Relationship to Adjacent Land Uses**

Land use conflicts are not anticipated to be significant under EIS Alternative 1 due to the proposed layout of land uses; the open space, setbacks, and design standards; and landscaping incorporated into the site plan, as well as existing physical barriers within and adjacent to the site.

**Layout of Uses**

The proposed layout of uses under Alternative 1 would reduce potential conflicts with the land uses surrounding the site. This primarily relates to the types of uses and their intensities/heights.

**Figure 3.6-5**, Proposed Zoning Diagram – Alternative 1, illustrates the proposed zoning/height zones to be included in the PDO. **Figure 2-10 in Chapter 2** shows the types, layouts, and intensities of the proposed buildings under Alternative 1. As shown on these two figures, the high-density multifamily residential and high-density mixed uses would be situated primarily in the southern part of the site in buildings SE 2, SW 1, and SW 2, adjacent to the Madrona Square multifamily development, and also in building NW 1 internal to the site. Medium-density multifamily residential uses would be located along the east and south site boundaries, adjacent to single-family residential uses and Madrona Square, respectively. A small amount of the residential use (up to 35 units) could be low-density multifamily residential (rather than medium or high-density residential) and could be located at the south end of the site, along the eastern and western site boundaries in buildings TH 1, TH 2, and TH3, adjacent to existing single-family use. Non-residential uses would be located in the lower levels of the buildings in the north and central portions of the site, adjacent to existing school, multifamily residential, park, and mobile home uses to the north, and church and single-family residential uses to the east. All of the non-residential uses would be neighborhood commercial in character, in keeping with and complementing the surrounding uses.
Park District Project
Draft EIS

figure 3.6-5
Zoning Diagram – Alternative 1

PDO Boundary
- Height Area A - 15 floors
- Height Area B - 9 floors
- Height Area C - 7 floors
- Height Area D - 4 floors
- Height Area E - 28 feet
Open Space, Setbacks, and Design Standards

Proposed open space, setbacks, and design standards would help to minimize land use impacts.

As noted previously, approximately 58% of the site would be provided in open space. A large (approximately 1.5-acre) publicly accessible park would be located in the center of the site.

As shown in Table 3.6-1, the Park District PDO would change the minimum UR3 zone setbacks. Setbacks would differ based on building height. As an urban project, the Park District proposes shallow or minimal building setbacks.

<table>
<thead>
<tr>
<th>Setback Standard</th>
<th>PARK DISTRICT PDO</th>
<th>UR3 ZONE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minimum setbacks, buildings four stories or more:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Front</td>
<td>0</td>
<td>20’</td>
</tr>
<tr>
<td>Rear (with alley)</td>
<td>20’</td>
<td></td>
</tr>
<tr>
<td>Rear (no alley)</td>
<td>20’</td>
<td></td>
</tr>
<tr>
<td>Side, Street</td>
<td>Building frontage standards would be included in the Park District Design Standards</td>
<td>10’</td>
</tr>
<tr>
<td>Side, Interior</td>
<td>5’</td>
<td></td>
</tr>
<tr>
<td>Minimum setbacks, buildings three stories or less:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Front</td>
<td>5’</td>
<td>20’</td>
</tr>
<tr>
<td>Rear (with alley)</td>
<td>10’</td>
<td>20’</td>
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<tr>
<td>Rear (no alley)</td>
<td>10’</td>
<td>20’</td>
</tr>
<tr>
<td>Side, Street</td>
<td>5’</td>
<td>10’</td>
</tr>
</tbody>
</table>


Setback standards are proposed that would depend on the use and design of the ground floor. In summary for buildings four stories or taller:

- Ground floor portions designed as storefronts (retail or similar active uses) would not be required to have any street setback.
- Ground-floor residential uses would be required to have a combination of techniques to provide good interface (privacy/security) between the public realm and private dwelling units. The menu of possible techniques would include: landscaped setbacks, elevating the dwelling unit above grade, and other architectural/landscaping treatments.
- Standards would be provided for blank walls at the ground level, with a menu of treatment options.
• Compliance alternatives would be available for all of the above standards (different or creative designs that satisfy the purpose of the standards would be considered).

**Landscaping**

The proposed design concept includes landscaping throughout the site. Landscape buffers planted along the east, west, and north boundaries of the site would provide a transition to the taller buildings of the Park District. The landscape buffers along the east and west site boundaries would generally be “Type II” (see-through buffer) at least ten feet deep; the landscaping on the north boundary would be “Type III” (ornamental effects) at least ten feet deep.

**Existing Physical Barriers**

The roadways (e.g., 12th Street, Fir Street, Pine Street, 14th Street, and 15th Street) along the site boundaries and the topography of the site that slopes down to the west would help separate the proposed uses from surrounding less intensive uses.

**Increased Activity Levels**

The increase in activity levels under Alternative 1 would primarily relate to the increased residential population. The existing buildings onsite are currently vacant and are planned to be demolished and removed as a separate action. Approximately 3,645 residents\(^1\) are expected at project buildout. Activity levels would also increase from the employees and visitors to the future retail, civic/service, and office uses. Approximately 141 employees\(^2\) could occupy the non-residential uses at project buildout.

Overall, significant direct impacts to land uses adjacent to the site during operation of the project are not anticipated under Alternative 1 with the provisions described above.

**Indirect and Cumulative Impacts**

Redevelopment on the Park District site under Alternative 1, along with the development of Madrona Square and other recently completed projects in the area, would contribute to the cumulative residential and employment growth in the Delta neighborhood. The increase in on-site population (residents, employees, and visitors) would add to the cumulative increase in activity levels in the area. The increase in residential population could also result in an increased demand for goods and services. It is anticipated that some of this demand could be fulfilled by businesses that would locate in the proposed development, as well as existing businesses near the site in the Delta neighborhood.

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1 The estimate of new residents is based on an average household size in City of Everett of 2.43 persons per household from the U.S. Census Bureau, American Community Survey (ACS), 5-Year Estimates, 2017-2021.

2 The estimate of employees is based on the “commonly accepted assumption” of 1 employee per 500 sq. ft. for commercial uses including retail, civic/service, and office.
To the extent that area property owners perceive an opportunity for development based, in part, on the new population at the Park District site, some new development in the area could be indirectly generated, particularly to the west of the site along Broadway where there is available land for potential redevelopment. Any development/redevelopment indirectly generated by development of the Park District site would likely occur incrementally over time. New development in the vicinity would be controlled by existing Comprehensive Plan policies and zoning regulations. It should be noted that the City of Everett is currently in the process of updating their Comprehensive Plan. In August 2023, the City Council approved three growth alternatives for analysis as part of the update process, including Alternative 1 – Extend Current Plans, Alternative 2 – Concentrated Growth Pattern, and Alternative 3 – Dispersed Growth Pattern. Updates to the Comprehensive Plan could result in the potential for additional development in the vicinity of the Park District site. The City intends to complete the update process in 2024 (see the City of Everett’s website [everettwa.gov/2044] for further details on their Comprehensive Plan Update process). As a result, significant indirect/cumulative impacts to land uses in the area are not anticipated.

**Alternative 2 - Design Alternative**

Under Alternative 2, proposed redevelopment of the site would feature the same amounts of new residential units, and retail, civic/service, and office uses as Alternative 1. However, 17 buildings (two more than Alternative 1), four with a lower maximum height (10 stories) than Alternative 1, would be built onsite, resulting in greater site coverage. Less of the site would be in open space and less of the open space would be consolidated into a large, publicly accessible park. (See Figure 2-13, Land Use Plan – Alternative 2.)

Table 2-2 provides an overview of development under Alternative 2.

A breakdown of the site area under Alternative 2 is presented in Table 2-3. As shown, approximately 12.7 acres (79% of the site) would be covered in built areas and 3.3 acres (21% of the site) would be in natural/landscape areas under Alternative 2. More of the site would be in built area and less in natural/landscape area than under Alternative 1 due to the two additional buildings.

**Direct Construction Impacts**

Like Alternative 1, proposed development under Alternative 2 would convert a vacant, multifamily residential development into a mixed-use development (including multifamily residential, retail, civic/service, and office uses, as well as open space).

Development of Park District under Alternative 2 would occur in multiple phases, potentially beginning in 2024 and ending in 2035.

Site preparation and construction of infrastructure and buildings under Alternative 2 could result in periodic, temporary impacts to adjacent land uses over the assumed buildout of
the site, similar to under Alternative 1. The land uses surrounding the site that could be impacted during construction include: the existing elementary school to the northwest, the park to the north, multifamily residential uses to the north and south, single-family residential uses to the east, south, west, and a church to the northeast. Construction impacts on surrounding uses would be minimized by existing topography, separation by existing roadways, and adherence to City construction regulations, similar to Alternative 3.

Like Alternative 1, construction-related impacts to off-site land uses would be temporary in nature and with implementation of the identified mitigation measures, significant adverse impacts on surrounding land uses are not anticipated.

**Direct Operation Impacts**

**Transition to More Intensive Land Uses**

Proposed development under Alternative 2 would represent a transition of the Park District site from a less intensive former multifamily residential development to a more intensive mixed-use development, including medium- and high-density residential uses and non-residential uses. The transition in uses would occur in an incremental, phased manner.

Up to 15,000 residential units in a total of 17 buildings would be constructed under Alternative 2, four to a maximum of 10 stories in height. Ten-story buildings are allowed by the site’s current Residential, Multifamily land use designation but not by the UR3 zoning classification and would require approval of a PDO. The up to 70,600 GSF of non-residential uses are not allowed by the existing UR3 zoning and would also require approval of a PDO. See Section 3.8, *Aesthetics/Light and Glare*, for a discussion of the height, bulk, and scale impacts of Alternative 2.

Less of the site would be provided in open space under Alternative 2 than under Alternative 1 (a total of approximately 7.9 acres versus 8.5 acres), and the open space would not be consolidated as a large publicly accessible park in the central part of the site.

**Relationship to Adjacent Land Uses**

Similar to Alternative 1, land use conflicts are not anticipated to be significant under Alternative 2 due to the proposed layout of land uses; open space, setbacks, design standards; and landscaping incorporated into the site plan, as well as existing physical barriers within and adjacent to the site.

**Increase in Activity Levels**

The increase in activity levels under Alternative 2 would primarily relate to the increased residential population. The existing buildings onsite are currently vacant and are planned to be demolished and removed. Approximately 3,645 residents are expected at project

\(^3\) The estimate of new residents is based on an average household size in City of Everett of 2.43 persons per household from the U.S. Census Bureau, American Community Survey (ACS), 5-Year Estimates, 2017-2021.
buildout. Activity levels would also increase from the employees and visitors to the future retail, civic/service, and office uses. Approximately 141 employees\(^4\) could occupy the non-residential uses at project buildout.

Overall, significant direct impacts to land uses adjacent to the site during operation of the project are not anticipated under Alternative 2.

**Alternative 3 - No Action**

Under Alternative 3, the No Action Alternative, the site would remain in its existing condition, but demolition and removal of the buildings will ultimately occur under a separate action.

Alternative 3 is assumed to be developed in the future as allowed by the site’s UR3 zoning. Development would include a total of up to approximately 458 housing multifamily residential units in up to four-story buildings. No non-residential uses are allowed in the site’s UR3 zoning; therefore, none are assumed. A total of approximately 377 surface parking spaces would be provided. More of the site would be in open space than under the other EIS alternatives because the parcel west of Poplar Street would be unbuildable due to the required building setbacks. However, no large, publicly accessible park would be provided.

A breakdown of the site area under Alternative 3 is presented in Table 2-4. As shown, approximately 11.1 acres (69% of the site) would be covered in built areas and 4.9 acres (31% of the site) would be in natural/landscape areas under Alternative 3.

**Direct Construction Impacts**

Proposed development under Alternative 3 would convert a vacant, multifamily residential development into a more intensive multifamily residential development. The proposed multifamily residential uses under Alternative 3 would be less intensive than the medium- and high-density residential and mixed-uses under Alternatives 1 and 2.

Development of the Park District under Alternative 3 is assumed to begin in 2024 and end in 2035. However, construction activities under Alternative 3 would likely be shorter and less impactful and would reduce some potential land use impacts on the surrounding area.

Site preparation and construction of infrastructure and buildings under Alternative 3 could result in periodic, temporary impacts to adjacent land uses over the assumed buildout of the site. Construction impacts on surrounding uses would be minimized by existing

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\(^4\) The estimate of employees is based on the “commonly accepted assumption” of 1 employee per 500 sq. ft. for commercial uses including retail, civic/service, and office.
topography, separation by existing roadways, and adherence to City construction regulations, similar to Alternatives 1 and 2.

Like Alternatives 1 and 2, construction-related impacts to off-site land uses would be temporary in nature and with implementation of the identified mitigation measures, significant adverse impacts on surrounding land uses are not anticipated.

**Direct Operation Impacts**

**Transition to More Intensive Land Uses**

Proposed development under Alternative 3 would represent a transition of the Park District site from a less intensive former multifamily residential development to a more intensive multifamily residential development. The transition in uses would occur in an incremental, phased manner.

Up to 458 residential units would be constructed under Alternative 3 in townhouses or flats up to a maximum of four stories in height. See Section 3.8, Aesthetics/Light and Glare, for a discussion of the height, bulk, and scale impacts of Alternative 3.

Approximately 9.4 acres of open space would be provided, including publicly accessible open space and private and semi-private open space. More of the site would be provided in open space than under Alternatives 1 and 2 because the parcel west of Poplar Street would be unbuildable due to the required building setbacks.

**Relationship to Adjacent Land Uses**

Land use conflicts are not anticipated to be significant under EIS Alternative 3 due to the assumed open space and setbacks, landscaping incorporated into the site plan, and existing physical barriers within and adjacent to the site. The lower density of development under Alternative 3 would also result in reduced potential for land use conflicts when compared to Alternatives 1 and 2.

**Increase in Activity Levels**

The increase in activity levels under Alternative 3 would relate to the increased residential population. The existing buildings onsite are currently vacant and are planned to be demolished and removed. Approximately 1,113 residents\(^5\) are expected at project buildout, less than \(\frac{1}{2}\) the residents under Alternatives 1 and 2. No employees would work at the site.

Overall, significant direct impacts to land uses adjacent to the site during operation of the project are not anticipated under Alternative 3.

\(^5\) Ibid 1.
Conclusion

EIS Alternatives 1 and 2 would convert the vacant, multifamily residential development into a mixed-use development (including low and high-density multifamily residential, retail, civic/service, and office uses, as well as open space). In the future, Alternative 3 could convert the site into a low-density multifamily development, consistent with the site’s existing zoning.

Construction activities could impact adjacent uses under all the EIS alternatives. Construction under Alternative 3 would likely be shorter and less impactful and would reduce some potential land use impacts in the vicinity of the site. Overall, construction-related impacts to off-site land uses would be temporary in nature and with implementation of the identified mitigation measures, significant adverse impacts on surrounding land uses are not anticipated.

There would be up to 15,000 residential units, and 70,600 GSF of non-residential units under Alternatives 1 and 2. Alternative 1 would include 15 buildings up to a maximum of 15 stories; Alternative 2 would include 17 buildings up to a maximum of 10 stories, thereby reducing the open space area onsite. Alternative 1 would require a Comprehensive Plan text amendment and PDO approval. Alternative 2 would only require PDO approval. Alternative 3 could include a total of 458 residential units in buildings up to a maximum of 4 stories, consistent with the site’s Comprehensive Plan designation and zoning classification. The proposed land uses and their densities under the EIS alternatives could result in potential land use impacts that would be typical of more intensive land uses, including increases in activity levels and potential land use incompatibilities. Alternative 3 would generate less of these potential impacts. Land use conflicts are not anticipated to be significant under any of the EIS alternatives, however, due to the proposed layout of land uses; open space, setbacks, and design standards; and landscaping incorporated into the site plans, as well as existing physical barriers within and adjacent to the site.

3.6.3 Mitigation Measures

The following measures have been identified to address the potential land use impacts from construction and operation of the Park District Project. These measures apply to both Alternatives 1 and 2 unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state, and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce impacts. Other Possible Measures are additional measures that could be implemented to address impacts but are not necessary to mitigate significant impacts.
Legally-Required Measures

- Proposed development would adhere to the provisions of the proposed Comprehensive Plan text amendment, proposed PDO, and Development Agreement, as well as other applicable City of Everett Municipal Code requirements.

- Additional mitigation measures would be provided to minimize overall impacts from construction of the site (see Section 3.1, Earth; Section 3.4, Air Quality/Greenhouse Gas Emissions; Section 3.5, Noise, and Section 3.10, Transportation).

- Additional mitigation measures would be provided to minimize the overall impacts from operation of the development (see Section 3.5, Noise, Section 3.8, Aesthetics/Light and Glare, Section 3.10, Transportation, and Section 3.11, Public Services).

Measures Proposed as Part of the Project

- Proposed development would be phased over an approximately 12-year buildout period.

- Open space would be included under all the EIS alternatives. Landscape buffers would be provided on the north, east, and west site boundaries under Alternatives 1 and 2. Alternative 1 would include a large, publicly accessible park located in the center of the site.

- Careful consideration would be given to the placement and orientation of non-residential uses to ensure compatibility with residential uses.

3.6.4 Significant Unavoidable Adverse Impacts

The Park District Project would convert a vacant, low-density multifamily residential development to a mixed-use development comprised of medium- and high-density residential and non-residential uses. The site is located within a City/Urban Growth Area and is considered appropriate for urban development. With implementation of the mitigation measures listed above, no significant adverse land use impacts are expected.

3.6.5 Relationship to Plans and Policies

This section evaluates the consistency of the Alternatives 1 and 2 with relevant adopted land use plans, policies, and development regulations in effect at the time of publication of this DEIS. As described in Chapter 2, it is unknown if federal funding/nexus is planned for the redevelopment; however, in the event that federal funding does occur, discussions of the relationship of the EIS alternatives to certain federal plans, policies, and regulations are provided. The plans, policies and regulations that are summarized and evaluated in this section include:
Federal Plans, Policies and Regulations
- HUD Environmental Regulations
- Clean Air Act
- Clean Water Act
- Endangered Species Act
- Migratory Bird Treaty Act
- Executive Order 13112, Invasive Species
- National Historic Preservation Act
- Coastal Zone Management Act

State and Regional Plans, Policies and Regulations
- State Growth Management Act
- Puget Sound Regional Council Vision 2050
- Snohomish County Countywide Planning Policies

Local Plans, Policies and Regulations
- 2035 City of Everett Comprehensive Plan
- Everett Housing Action Plan (2021)
- City of Everett Land Use Code

Federal Plans, Policies and Regulations

**U.S. Department of Housing and Urban Development**

**Summary:** The Department of Housing and Urban Development’s (HUD) NEPA environmental review procedures for entities assuming HUD environmental review, decision-making, and action responsibilities under NEPA and related federal laws and authorities are contained in Title 24, Part 58 of the Code of Federal Regulations (CFR). These regulations provide instruction and guidance to recipients of HUD assistance and other responsible entities for conducting an environmental review and for obtaining approval of a Request for Release of Funds.

**Discussion:** Should federal funding become available for the Park District Project, NEPA environmental review would be conducted. The NEPA review would be prepared consistent with HUD’s environmental review procedures as outlined in Title 24, Part 58 of the CFR, and would likely incorporate analysis from this SEPA EIS.

**Summary:** HUD’s basic regulation for responsible entities assuming HUD environmental review decision-making, and action responsibilities that implement the National Environmental Policy Act (NEPA), the regulations of the Council on Environmental Quality (CEQ) and other related Federal environmental laws and authorities are contained in Title 24, Part 58 of the Code of Federal Regulations (CFR).
The responsible entity must certify that it has complied with the requirements that would apply to HUD under the following law and authorities, and must consider the criteria, standards, policies and regulations of the following laws and authorities:

(a) Historic properties.
   (3) Federal historic preservation regulations as follows:
      (i) 36 CFR part 800 with respect to HUD programs other than Urban Development Action Grants (UDAG); and
      (ii) 36 CFR part 801 with respect to UDAG.

(b) Floodplain, management and wetland protection.
   (1) Executive Order 11988, Floodplain Management, May 24, 1977 (42 FR 26951), 3 CFR, 1977 Comp., p. 117, as interpreted in HUD regulations at 24 CFR part 55, particularly section 2(a) of the order (For an explanation of the relationship between the decision-making process in 24 CFR part 55 and this part, see § 55.10 of this subtitle A.)
   (2) Executive Order 11990, Protection of Wetlands, May 24, 1977 (42 FR 26961), 3 CFR, 1977 Comp., p. 121, as interpreted in HUD regulations at 24 CFR part 55, particularly sections 2 and 5 of the order.

(c) Coastal Zone Management. The Coastal Zone Management Act of 1972 (16 U.S.C. 1451 et seq.), as amended, particularly section 307(c) and (d) (16 U.S.C. 1456(c) and (d)).

(d) Sole source aquifers.
   (2) Sole Source Aquifers (Environmental Protection Agency—40 CFR part 149).


(f) Wild and scenic rivers. The Wild and Scenic Rivers Act (16 U.S.C. 1271 et seq.), as amended, particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c)).

(g) Air quality.
   (1) The Clean Air Act (42 U.S.C. 7401 et. seq.) as amended; particularly section 176(c) and (d) (42 U.S.C. 7506(c) and (d)).
   (2) Determining Conformity of Federal Actions to State or Federal Implementation Plans (Environmental Protection Agency—40 CFR parts 6, 51, and 93)

(h) Farmlands protection.
   (1) Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.) particularly sections 1540(b) and 1541 (7 U.S.C. 4201(b) and 4202).
   (2) Farmland Protection Policy (Department of Agriculture—7 CFR part 658).
(j) HUD environmental standards. Applicable criteria and standards specified in part 51 of this title, other than the runway clear zone notification requirement.


Discussion: See the discussion below under National Historic Preservation Act, and Section 3.9, Historic and Cultural Resources, for a description of the project’s compliance with federal laws, regulations and procedures related to historic properties.

The Park District site is not located within a floodplain. Thus, development at the site is not subject to the flood-related federal laws, regulations, and procedures listed above. An existing wetland (Wetland A) has been identified adjacent to the site to the west. See Section 3.3, Biological Resources, and Appendix D, for information on the protection of this wetland with proposed development under the Alternatives 1 and 2.

The site is not located within a Coastal Barrier area. Thus, development at the site is not subject to the Coastal Barrier Resources Act. Snohomish County is designated as part of the coastal zone and is subject to the Coastal Zone Management Act (see below for information on CZM compliance).

No sole source aquifer is located beneath the site. Thus, development at the site is not subject to the Safe Drinking Water Act.

No federally-listed species or federally-designated critical habitat are expected to occur on or immediately adjacent to the site. Thus, development at the site would not affect these species/habitat. See below under the Endangered Species Act, Section 3.3 Biological Resources, and Appendix D, for further discussion of this federal law.

The site is not located in proximity to a Wild and Scenic River. Thus, development on the site is not subject to the Wild and Scenic Rivers Act. See below for a discussion of compliance with the Federal Water Pollution Control Act, and Section 3.2, Water Resources, and Appendix C for details.

See below and Section 3.4, Air Quality / GHG Emissions, and Appendix E, for information on the project’s relationship to the Clean Air Act and other local and state air quality regulations.

The Park District site is currently designated as Residential, Multifamily in the City of Everett Comprehensive Plan (2015 -2035) and zoned Urban Residential 3 (UR3). No farmland is present on the site and development on the site is not subject to the Farmland Protection Policy Act.
Proposed development under Alternatives and 2 is not expected to result in disproportionate impacts on minority or low-income populations. The affordable and mixed-income housing provided onsite under Alternatives 1 and 2 could be considered a positive impact relative to diversifying the options for housing in the area. Providing more housing in the neighborhood would also contribute towards satisfying the City’s goal of providing sufficient housing opportunities to meet the needs of present and future residents of Everett. (See Section 3.13, Socioeconomics / Environmental Justice, for details).

**Summary:** The Department of Housing and Urban Development (HUD) provides environmental standards for determining project acceptability and necessary measures to ensure that activities assisted by HUD achieve the goal of a suitable living environment. The environmental criteria, encompassed in 24 CFR Part 51 include noise abatement and control and the siting of HUD-assisted projects near hazardous operations including explosives, flammables, runway clear zones at civil airports, and accident potential zones at military airfields. In addition, as set forth in 24 CFR 58.5(i)(2), it is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended use of the property.

**Discussion:** Section 3.5, Noise, and Appendix F, include observations of existing noise levels and an analysis of potential noise impacts that could occur on Park District site under Alternatives 1 and 2. The analysis concluded that with implementation of the identified mitigation measures, the project is not expected to result in significant noise impacts. The site is also not located in an area with substantial noise that could impact proposed development.

The site is not located in proximity to hazardous operations including explosives, flammables, runway clear zones at civil airports, or accident potential zones at military airfields. The only environmental health hazard located on the site is a small soil area in the northwest corner containing arsenic concentrations associated with the Asarco Everett Smelter. Development in this area of the site would require an environmental study and cleanup prior to any construction activities.

**Clean Air Act**

**Summary:** The Clean Air Act is a federal law intended to protect public health and the environment from dangerous air pollution. The Act regulates air emissions from stationary and mobile sources and authorizes the EPA to establish National Ambient Air Quality Standards (NAAQSs). The EPA designates locations not meeting NAAQSs as a U.S. EPA Nonattainment Area and prohibits federal assistance to projects that are not in conformance with the air quality State Implementation Plan to bring areas back into compliance with NAAQSs, or attainment Maintenance areas are attainment areas previously designated as nonattainment areas. New construction and conversion in “non-attainment”
or “maintenance” areas as designated by the EPA may need to be modified or mitigation measures developed and implemented.

**Discussion:** The Park District site and surrounding area currently meet all air quality standards. Therefore, no modifications or mitigation should be required. (See Section 3.4, *Air Quality and GHG Emissions*, for details.)

**Clean Water Act (Federal Water Pollution Control Act)**

**Summary:** The Clean Water Act (CWA) is a federal statute that protects surface water quality through a variety of tools to reduce direct pollutant discharges into waterways and manage polluted runoff. The CWA prohibits discharging pollutants from a point source (i.e. pipe, ditch etc.) into navigable waters unless an EPA National Pollutant Discharge Elimination System (NPDES) permit is obtained.

**Discussion:** The Washington Department of Ecology has local jurisdiction over the Clean Water Act. Stormwater regulation for the Park District Project is per the Everett Stormwater Code. The code identifies regulations in compliance with the Phase I NPDES permit and provides guidance for the application and design of stormwater Best Management Practices (BMPs) and infrastructure facilities. See Section 3.2, *Water Resources*, and Appendix C for details on the project’s relationship to local and state stormwater regulations.

**Endangered Species Act**

**Summary:** Section 7 of the Endangered Species Act (ESA) is administered by the United States Fish and Wildlife Service (USFWS) and the National Oceanographic and Atmospheric Administration (NOAA). The ESA, as amended, applies to federal agency actions, and sets forth requirements for consultation to determine if the proposed action “may affect” an endangered or threatened species and their critical habitat. If an agency determines that an action “may affect” a threatened or endangered species or critical habitat, then Section 7(a)(2) requires each agency, generally the lead agency, to consult with the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS) (the Services), as appropriate, to ensure that any action the agency authorizes, funds, or carries out is not likely to jeopardize the continued existence of any federally listed endangered or threatened species, or result in the destruction or adverse modification of critical habitat. If a species has been proposed for federal listing as threatened or endangered, or a critical habitat has been proposed, Section 7(a)(4) states that each agency shall confer with the Services.

**Discussion:** An analysis of biological resources on the Park District site and in the site vicinity is provided in Section 3.3, *Plants and Animals*, and Appendix C. The analysis indicates that no federally-listed species and no federally-designated critical habitat are expected to occur on or immediately adjacent to the site. Thus, development at the site under Alternatives 1 and 2 is not expected to affect these species/habitats.
**Migratory Bird Treaty Act**

**Summary:** The Migratory Bird Treaty Act (MBTA) prohibits private parties (and federal agencies in certain judicial circuits) from intentionally taking a migratory bird, its eggs, or nests. “Take” is defined as “pursue, hunt, shoot, wound, kill, trap, capture, or collect” (50 CFR §10.21). The MBTA prohibits taking, selling, or other activities that would harm migratory birds, its eggs or nests, unless the U.S. Secretary of the Interior, through the USFWS, authorizes such activities under a special permit. Part 724 FW 1-2 of the USFWS Service Manual (USFWS 2003) states that for migratory birds other than eagles and endangered or threatened species, a permit is not required to dislodge or destroy migratory bird nests that are not occupied by juveniles or eggs. However, any such destruction that results in a take of any migratory bird is a violation of the MBTA (e.g., where juveniles still depend on the nest for survival).

**Discussion:** An analysis of biological resources (including migratory birds) on the Park District site is provided in Section 3.3, Plants and Animals, and Appendix C. As mentioned above, no federally-listed wildlife species, including birds, are expected to occur on or adjacent to the site. As a result, no significant impacts are expected with development under Alternatives 1 and 2.

**Executive Order 13112, Invasive Species**

**Summary:** Pursuant to Executive Order 13112, Invasive Species, enacted in February 3, 1999, federal agencies whose actions may affect the status of invasive species (alien species whose introduction does or is likely to cause economic or environmental harm to human health) are directed to use relevant programs and authorities, to the extent practicable and subject to available resources, to prevent the introduction of invasive species, and provide for restoration of native species and habitat conditions in ecosystems that have been invaded. Agencies are not to carry out actions that they believe are likely to cause or promote the introduction or spread of invasive species unless the benefits of such actions clearly outweigh the potential harm, and all feasible and prudent measures to minimize risk of harm should be taken in conjunction with the actions.

**Discussion:** Invasive plant species are not known to occur on the Park District site. Alternatives 1 and 2 are not expected to cause or promote the introduction or spread of invasive species. Native, noninvasive, and drought-tolerant plants would be incorporated into the landscaping under Alternative 1 and 2. (See Chapter 2, for additional information on the proposed landscaping).

**National Historic Preservation Act**

**Summary:** The National Historic Preservation Act of 1966 (Section 106) requires federal agencies or federally assisted undertakings to consider the effect of their undertakings on any district, site, building, structure, or object that is included in or eligible for inclusion in
the National Register of Historic Places. The process includes consultation between the lead agency and other parties with an interest in the effects of the proposed project on historic properties. Agencies are also required to afford the Advisory Council on Historic Preservation “a reasonable opportunity to comment about such undertaking.”

**Discussion:** An analysis of historic resources on the Park District site is provided in Section 3.9, **Historic / Cultural Resources.** The analysis indicates that none of the built-environment resources within the area of impact for the proposed project are recommended eligible for listing in the National Register of Historic Places, and, therefore, there would be no historic resources adversely impacted by Alternatives 1 and 2.

**State of Washington Plans, Policies, and Regulations**

**Growth Management Act**

**Summary:** The Growth Management Act (GMA) (RCW 36.70A), adopted in 1990 and subsequently amended, provides a comprehensive framework for managing growth and coordinating land use planning with the provision of infrastructure. The general goals of the GMA include, in part: directing growth to urban areas; reducing sprawl; encouraging economic development consistent with adopted comprehensive plans; protecting private property rights; providing efficient multi-modal transportation systems; encouraging a variety of housing types and densities affordable to all economic segments of the population; protecting the environment; and ensuring that public facilities and services necessary to support development meet locally established minimum standards at the time development is in place (RCW 36.70A.020).

Jurisdictions subject to GMA must prepare and adopt: countywide planning policies; comprehensive plans containing policies with specific elements for land use, transportation, housing, capital facilities, utilities, rural lands and economic development; and development regulations implementing those plans. The GMA requires that each city and county in Washington comprehensively review and revise its comprehensive plan and development regulations as necessary every eight year (soon to be every 10 years after the current cycle) to ensure that they comply with the GMA.

**Discussion:** Consistent with the GMA, the City of Everett has adopted a Comprehensive Plan and implementing regulations to guide future development and fulfill the City’s responsibilities under the GMA (the Comprehensive Plan was most recently updated in 2015). As described in **Chapter 2** of this DEIS, Alternatives 1 and 2 would satisfy several of the GMA goals, including: directing growth to urban areas (the site is located in Everett, an urban area); encouraging a variety of housing types and densities that would be affordable to mixed income segments of the population; protecting the environment (a wetland adjacent to the site has been identified and provisions made for its protection); and ensuring that public facilities and services necessary to support development meet
locally established minimum standards at the time development is in place (public services/facilities are available to serve the project). The relationship of Alternatives 1 and 2 to the City of Everett Comprehensive Plan is discussed in greater detail later in this sub-section.

Regional Plans, Policies and Regulations

Puget Sound Regional Council Vision 2050

Summary: VISION 2050 is the regional strategy for the central Puget Sound region encompassing King, Kitsap, Pierce, and Snohomish counties. VISION 2050 provides a regional framework for achieving the goals of the GMA and meets the multi-county planning requirements of the GMA for these counties. The vision is for an exceptional quality of life, opportunity for all, connected communities, a spectacular natural environment, and an innovative, thriving economy. VISION 2050 calls for focusing growth near high-capacity transit and inside the designated urban growth area. The plan also calls for cities and counties to support building more diverse housing types, especially near transit services and jobs, and for more housing that is affordable to low- and very low-income households.

Discussion: The Park District site is located in City of Everett’s Urban Growth Area. Everett Transit, Community Transit, and Skagit Transit currently provide transit service in the site vicinity. The site is directly served by Everett Transit’s Route 29. (See Section 3.10, Transportation, and Appendix J for details.)

Alternatives 1 and 2 would feature up to 1,500 multifamily housing units at full buildout. Most of the units are assumed to be built as medium and high-density multifamily, multi-story apartments; however, some low-density townhouse or flats could be provided as well. It is EHA’s goal to offer new housing for a range of incomes, including housing affordable for rent to households with an income at or below 80% of the Area Median Income (AMI) and housing for rent for mixed-income housing, such as for workforce employees (see Chapter 2 for details). Alternatives 1 and 2 would also include 70,600 GSF of non-residential uses, including retail, civic/service, and office uses, which would create approximately 141 jobs.

Snohomish County – Countywide Planning Policies

Summary: The Countywide Planning Policies (CPPs) apply to all cities and towns within Snohomish County, as well as the county itself. The CPPs provide the framework for each jurisdiction’s comprehensive plans and associated policies intended to comply with the Multicounty Planning Policies (MPPs) in VISION 2050. The CPPs include guidance on topics such as housing, economic development and employment, transportation, natural

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6 Per the U.S. Department of Housing and Urban Development’s (HUD) Income Limits Documentation System, the 2022 AMI in the Seattle-Bellevue Fair Market Rent Area (which contains King County and Snohomish County) is $134,600.
environment and public services and facilities. In terms of housing, the CPPs call for the promotion of fair and equitable access to safe, affordable, and accessible housing option for every resident through the expansion of a diverse housing stock that is in close proximity to employment, services, and transportation options.

**Discussion:** As described above under Puget Sound Regional Council Vision 2050, Alternatives 1 and 2 would feature up to 1,500 multifamily housing units at full buildout. Most are assumed to be built as medium and high-density multifamily, multi-story apartments. It is EHA’s goal to offer new housing for a range of incomes. The proposed housing is intended to be safe, affordable, and accessible and would be in close proximity to employment, services, and transportation options (see Section 3.11, **Public Services**, for descriptions of the services that are available to the project).

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**Local Plans, Policies and Regulations**

**City of Everett Comprehensive Plan**

**Summary:** The City of Everett Comprehensive Plan provides the overall goals and identifies land use patterns for the city. The relationship of the EIS alternatives to relevant goals and policies of the Comprehensive Plan is provided below.

The City of Everett’s Comprehensive Plan was first adopted in 1994 to meet the requirements of GMA; the Comprehensive Plan was substantially updated most recently in 2015. The current Comprehensive Plan (2035 Comprehensive Plan) is in the process of being reviewed and will be updated by 2024. The goals and policies cited below are from the current (2035) version of the Comprehensive Plan. The Comprehensive Plan consists of ten major elements: land use, housing, transportation, capital facilities and utilities, economic development, urban design and historic preservation, parks and recreation, climate change and sustainability, and a marine port element. Each element contains goals and policies that are intended to guide development of the City in the context of regional growth management for the next 20 years. While each element affects development within the City, the following elements are the most relevant to the EIS alternatives.

**Land Use Element**

*Policy 2.1.1* - Assure a wide range of housing opportunities throughout the entire community, while preserving and creating distinct residential neighborhoods. Designate on the Land Use Map areas appropriate for various types of housing at specified density ranges, but without major changes in most residential areas to the existing land use designations.

*Policy 2.1.2* - Promote increased densities and infill housing types in all residential neighborhoods through appropriate design standards that reinforce the single family character of areas zoned single family, and which assure that multiple family developments integrate with and enhance the neighborhoods in which they are permitted.
Policy 2.1.4 - Promote high-density residential use in well designed, mixed-use commercial developments in and around the downtown, near transportation facilities, and other appropriate locations where a mix of uses will promote a more efficient use of land and support of transportation facilities, compatible with surrounding neighborhoods.

Policy 2.11.1 - Residential, Multifamily densities and intensities are identified as follows:

<table>
<thead>
<tr>
<th>Land Use Designation</th>
<th>Population Densities</th>
<th>Building Intensity</th>
<th>Area (AC) Designated</th>
</tr>
</thead>
</table>
| Residential, Multifamily   | 15 to unlimited units per gross acre        | • No more than 95% lot coverage  
|                            |                                             | • Up to 10 stories                                     | 2238 acres 6%        |

Discussion: Everett Housing Authority intends for the Park District to be a cohesive, well-designed mixed-use development, including residential, non-residential, and open space/park amenities, that would be compatible with the surrounding neighborhood (see the discussion of Relationship to Adjacent Land Uses earlier in this section for details on the project’s compatibility). Proposed development under Alternatives 1 and 2 would include medium and high-density multifamily housing, and possibly low-density housing. EHA intends to offer the new housing at a range of incomes and provide equitable investment into the diverse and underserved Delta neighborhood.

The development concept for the Park District would be guided by a Development Plan that would be implemented based on a Development Agreement, project-specific conditions of approval, and site-specific development permits approved by City of Everett. Design standards would be incorporated into the Development Agreement between EHA and the City of Everett to provide for the quality and consistency of the project design and would be maintained throughout project development. These standards would ensure that the project is well-integrated into the neighborhood context. (See Chapter 2 for details.)

Existing transportation facilities are present on and in the vicinity of the site. Streets are currently located along the edges and pass through the site. Transit facilities are located nearby. Most of the roadways in the area have sidewalks on both sides. (See Section 3.10, Transportation, and Appendix J for details.)

Alternative 1 would require modifications to the density/intensity provisions of the site’s Residential/Multifamily land use designation. The density and lot coverage requirements for this designation would be met; however, buildings would be a maximum of 15 stories in height, taller than the allowed 10 stories. As such, a Comprehensive Plan text amendment is required. Alternative 2 would meet the density/intensity provisions of the site’s land use designation.
Land Use Designation – Locational Criteria; Residential, Multifamily

Multifamily areas are supported by a full range of public facilities and services, including transit, pedestrian and bicycle routes, utilities (water, sewer, stormwater), fire, and police. Areas designated for multifamily use will be located so as to avoid or minimize traffic impacts on single-family neighborhoods. Open space and public parks are generally available within walking distance to help meet the needs of the residents of multifamily developments.

Building heights can range from townhouse development to taller apartment buildings. Multifamily development should be compatible with, and transition to adjacent single-family neighborhoods using design features to ensure compatibility.

Residential densities range from fifteen (15) units per gross acre to unlimited. Densities are typically limited by lot size, building heights, and parking.

Discussion: The multifamily residential uses proposed under Alternatives 1 and 2 would be supported by a full range of public facilities and services. Transit services are located proximate to the site. Non-motorized facilities would be provided with the project, including: wider sidewalks along all the streets onsite; bike lanes in 12th Street and Poplar Street adjacent to the site; a multi-use path west of Poplar Street; and other paths throughout the site. Adequate public services and utilities are also available to serve the project (see Section 3.11, Public Services, and 3.12, Utilities, for details).

The transportation impacts of the EIS alternatives are analyzed in this DEIS. This analysis concluded that with transportation features built into the project as well as the identified mitigation measures (including the implementation of a Construction Management Plan, payment of required traffic mitigation fees, and implementation of a Transportation Demand Management Plan), the Alternatives 1 and 2 would not result in significant transportation impacts. (See Section 3.10, Transportation, and Appendix J for details.)

Alternatives 1 and 2 would include open space throughout the site, including built open space (e.g., plazas, courtyards, pathways/sidewalks) and natural open space (e.g., parks, lawns, and other landscaping). Alternative 1 would feature a large (approximately 1.5-acre) publicly accessible park in the center of the site; this park would not be provided with Alternative 2. The Wiggums Hollow Park is located within walking distance of the site.

Alternatives 1 and 2 would include medium and high-density multifamily housing in taller apartment buildings; a limited number of low-density townhouse/flats could also be provided. Land use conflicts are not anticipated to be significant under Alternatives 1 and 2 due to the proposed layout of land uses; open space, setbacks, design standards;
and landscaping incorporated into the site plan, as well as existing physical barriers within and adjacent to the site.

**Housing Element**

**Housing Types and Opportunities**

**Goal 4.0** - The goal of the Housing Element is to provide sufficient housing opportunities to meet the needs of present and future residents of Everett for housing that is decent, safe, accessible, attractive, and affordable.

**Objective 4.1** - The City shall promote a wide variety of choices for safe and decent housing for all citizens through a variety of housing types within the Everett Planning Area.

**Policy 4.1.2** - Promote housing alternatives to the large lot single family detached dwelling and large footprint apartment complexes.

**Policy 4.1.4** - Support the principle that fair and equal access to housing is available for all citizens.

**Policy 4.1.5** - Encourage housing that connects with and contributes to the vibrancy and livability of the local neighborhood and community.

**Policy 4.1.6** - Encourage or incentivize housing with amenities and attributes that are attractive to all income groups, ages, and household types in the urban center, near the manufacturing and industrial center, and in transit-oriented corridors.

**Policy 4.1.8** - Encourage housing that is attractive and affordable with amenities for households with children.

**Policy 4.1.12** - Encourage construction of housing that is adaptable and appeals to people of all ages and abilities.

**Discussion:** Alternatives 1 and 2 would feature up to 1,500 multifamily housing units at full buildout that would help meet the housing needs of present and future residents of Everett (see Section 3.7, **Housing**, for details). There are no other residential sites in the Delta neighborhood and North Everett that are positioned to address the housing need at this scale.

Most of the proposed housing units are assumed to be built as medium- and high-density multifamily, multi-story apartments; however, some low-density townhouses or flats could also be provided. The proposed housing is intended to be safe, affordable, and accessible, and provide equitable investment into the diverse and underserved Delta neighborhood. It is EHA’s goal to offer new housing for a range of incomes. Design
standards would be included in the project’s Development Agreement to encourage new buildings to provide high quality architectural design. The proposed development would include amenities that would serve different household types and ages, including built and natural open space for residents and employees of the project, as well as for the surrounding neighborhood. A key feature of Alternative 1 would be a large, publicly accessible park in the center of the site.

**Housing Preservation and Neighborhood Character**

**Policy 4.2.1** - Protect existing single-family neighborhoods from substantial changes such as rezoning to multiple family zones, but consider measures to increase housing capacity through strategies that accommodate well designed infill housing that protect the character of the neighborhoods.

**Policy 4.2.5** - Encourage replacement of housing that is demolished or converted to nonresidential use.

**Discussion:** The site is presently zoned Urban Residential 3 (UR3). The primary purpose of the UR3 zone is to provide for multiple family residential use. Proposed development under Alternatives 1 and 2 would convert a vacant, multifamily residential development into a mixed-use development that would include multifamily residential housing. Proposed development under Alternatives 1 and 2 would provide 1,500 housing units, increasing the housing capacity in the City of Everett. The proposed housing would replace a minimum of 139 low-income housing units which previously existed on the site.

**Jobs/Housing Balance**

**Objective 4.4** - Promote a housing policy and land use pattern that increases the ratio of housing units (for a variety of income levels) to jobs within the Everett Planning Area.

**Policy 4.5.4** - Encourage infill development on underutilized sites that have adequate urban services and ensure that the infill housing enhances and is compatible with the nearby neighborhood and community.

**Discussion:** Alternatives 1 and 2 would increase the ratio of housing units (for a variety of income levels) to jobs within the Everett Planning Area by providing an additional 1,500 housing units. Proposed development would occur on a currently vacant and underutilized site. Adequate urban services are available to serve the proposed development (see Section 3.11, Public Services, for details). The proposed layout of land uses; open space, setbacks, design standards; and landscaping incorporated into the site plan, as well as existing physical barriers within and adjacent to the site, would help ensure that the project is compatible with the nearby neighborhood and community.
Multiple Family Housing – Location and Compatibility

**Objective 4.7** - The City shall encourage new multiple family housing development in locations that have the least impact to existing single-family neighborhoods, designed to be compatible with and complimentary to surrounding land uses.

**Policy 4.7.1** - Encourage multiple family development and redevelopment in downtown, in mixed-use residential-commercial centers, along mixed-use arterial corridors, and near major employment areas.

**Policy 4.7.2** - Update design guidelines to ensure that new multiple family housing enhances and is compatible with surrounding uses yet respects the needs of consumers for affordable housing.

**Discussion:** The Park District site is near public transit facilities and employment areas. This site’s Multifamily Residential land use designation indicates that is an area that is not expected to be disruptive of existing single-family neighborhoods and is already developed with a significant amount of multifamily housing.

Design standards would be incorporated into the Development Agreement for the project to provide for the quality and consistency of the project design and would be maintained throughout project development (See **Chapter 2** for details.)

Multiple Family Housing – Location and Compatibility

**Policy 4.8.1** - Coordinate with the Everett Housing Authority, Snohomish County Housing Authority, non-profit housing providers, and other public and private housing interests to increase the supply of housing for low income and special needs populations within the Everett Planning Area.

**Policy 4.8.3** - Develop strategies to disperse subsidized rental housing equitably throughout the Everett Planning Area and to expand geographic housing choices for low- and moderate-income households.

**Discussion:** Everett Housing Authority (EHA) is the applicant for the Park District Project. EHA’s goal is to increase the supply of housing for a range of incomes on their property located in City of Everett (see **Chapter 2** for details on the income levels for which that the housing is intended.)

Economic Development Element

**Objective 7.1.1** - To increase the total number of firms and employees, while increasing the proportion represented by non-aerospace industries.
Objective 7.3.5 - To integrate needed housing in close proximity to businesses, services, and public transportation.

Policy 7.3.11 - Encourage development of community and neighborhood business centers to support surrounding residential areas.

Discussion: Mixed-use development under Alternative 1 and 2 would include up to 1,500 multifamily residential units and 70,600 GSF of non-residential uses (e.g., retail, civic/service, and office uses). The non-residential uses would serve the proposed development as well as surrounding residential areas. All nonresidential uses would be “neighborhood commercial” in character.

Urban Design and Historic Preservation Element

Policy 8.1.5 - Encourage the mixing of commercial uses with higher density housing as redevelopment occurs.

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.

Policy 8.1.16 - Protect public views of distant mountains and water whenever feasible as new development is approved.

Objective 8.3.3 - To promote infill development in older, established areas of the city that will continue to maintain the character of these areas.

Objective 8.3.6 - To preserve and encourage small scale, mixed-use centers in certain locations to serve as the focus for neighborhoods; offer opportunities for locally owned shops and services; and provide for the daily needs of nearby residents.

Objective 8.5.1 - To ensure that multiple family uses incorporate site and building design and landscaping features of single-family characteristics to soften their impact where multiple family development occurs near single family areas.

Discussion: Alternatives 1 and 2 would create a mixed-use development including housing; retail, civic/service, and office uses; and open space. Views of distant mountains would be possible from the proposed development. The project would represent infill development on an underutilized site in the established Delta neighborhood, and is intended to be a cohesive, well-designed mixed-use development that would be compatible with the neighborhood. The proposed non-residential uses would all be “neighborhood commercial” in character. These uses are intended to provide shops, services, and a gathering place for residents of the Park District Project and the neighborhood. Design standards that will be incorporated into the Development...
Agreement for the project would help ensure that the site and building design would be compatible with surrounding single-family areas.

**Parks and Recreation Element**

**Goal 9.3** - Provide parks and recreation facilities within a 10-minute walk of each resident.

**Policy 9.3.1** - Increase the amount of parks and trails for all residents in Everett consistent with level of service standards.

**Policy 9.3.2** - Provide just and fair quantity, proximity and connections to quality parks, trees, green spaces, and recreation facilities in Everett.

**Policy 9.3.5** - Remove barriers to parks and improve sidewalks and bike facilities to improve access to parks.

**Policy 9.4.2** - Maintain and develop recreation facilities to meet recreation program needs of the Everett community.

**Goal 9.5** - Maintain or improve the quality of the system for current residents as the system expands to meet the needs of growth.

**Policy 9.5.1** - Phase improvements in the park and trail system to remove barriers and increase equity through: a. Improving existing parks. b. Opening undeveloped parkland in the City’s inventory. c. Adding new trails that connect neighborhoods to existing parks. d. Adding new parks. e. Adding or improving tree canopy.

**Policy 9.6.2** - Within park sites, provide for active and passive park elements consistent with park classifications, site conditions, master plans, and community engagement results.

**Policy 9.6.6** - Ensure that quality park amenities, based on neighborhood feedback and need are provided within a 10-minute walk.

**Goal 9.7** - Improve access to recreational amenities throughout the community by adding more amenities, and creating better connection through trails, sidewalks, and bike lanes.

**Discussion**: Parks and recreational amenities are a key component of the Park District proposal. A signature component of Alternative 1 would be the large, publicly accessible park in the center of the site (no large park would be provided under Alternative 2). Under Alternative 1, over half of the site would be provided in open space, including built open space (e.g., plazas, courtyards, pathways/sidewalks) and natural open space (e.g., parks, lawns, and other landscaping). Approximately 76% of the open space would be publicly accessible and 24% in private/semi-private open space for project residents and employees. (See Chapter 2 for details).
**Transportation Element**

**Goal 2 - Quality Facilities.** Ensure design standards and maintenance procedures reflect current best practices.

**Policy 2.1** - Require new and redeveloped properties to incorporate design features that are transit, bicycle, and pedestrian-friendly.

**Policy 2.6** - Design transportation facilities that reflect the character of affected neighborhoods and accommodate a range of needs of the community that are broader than strict transportation requirements without compromising those requirements.

**Policy 2.7** - Develop and implement a comprehensive parking management program for all areas that generate high demand for both on-street and offstreet parking, including provisions for pricing and enforcement of on-street parking, supply of off-street parking, and strategies to reduce the demand for parking within those areas to support a balance of travel modes consistent with the Comprehensive Plan.

**Policy 2.10** - Ensure that off-street parking continues to be the primary source of parking supply for new development within the city.

**Policy 2.19** - Design neighborhood streets to be compatible with abutting land uses.

**Discussion:** Under Alternatives 1 and 2, the existing grid of streets that served the former Baker Heights residential development would be reconfigured through street vacations and right of way (ROW) dedications to create a new system of public streets for the proposed development. The project would dedicate ROW along its street frontages to bring those up to City of Everett standards. All the streets in the Park District site would be improved to include wider sidewalks. Bike lanes would be added to 12th Street and Poplar Street adjacent to the site. A multi-use path would be provided to the west of Poplar Street and other paths would be included throughout the site. A Parking Demand Management Plan would be created and implemented in order to reduce parking supply and associated demand. A total of 1,018 off-street parking spaces are proposed for the residential and non-residential uses onsite. On-street parking would be provided on Poplar Street, Hemlock Street, Fir Street, and 14th Street. Street improvements proposed along Poplar Street would allow Everett Transit to move its northbound bus to where it would be close to planned commercial and civic uses. (See Section 3.10, Transportation, and Appendix H.)

**Comprehensive Plan Text Amendment**

**Summary:** The Park District site’s Residential, Multifamily Comprehensive Plan land use designation allows buildings to a maximum height of 10 stories.
Discussion: A Comprehensive Plan text amendment is required for the proposed maximum building height of 15 stories under Alternative 1. The amendment applies to the land use designation table associated with land use element policy 2.11.1, and would increase the Residential, Multifamily building intensity height limit to read (with new text underlined): “10 stories, or 15 stories in a planned development overlay containing an area of at least five acres.” No Comprehensive Plan text amendment is required for Alternative 2.

Everett Housing Action Plan

Summary: The Everett Housing Action Plan identifies strategies to support more housing and preservation of existing homes to equitably meet the needs of the community. The main areas of the strategies emphasize: increasing housing variety, development in urban corridors, transit-oriented communities, and affordability and displacement. The Housing Action Plan recommended strategies better align the City’s policies, regulations, and funding to allow greater predictability for developers and a greater variety of housing types, intended to increased housing supply while preserving community character.

Discussion: Alternatives 1 and 2 would meet the strategies identified in the Everett Housing Action Plan, including supporting more housing (up to 1,500 housing units are proposed); increasing housing variety (medium- and high-density housing would be provided, and would be affordable to a range of incomes); orienting to transit (transit service is available to the site); and preserving community character (through creation of a cohesive, well-designed development that would be compatible with the neighborhood).

City of Everett Unified Development Code (Chapter 19 EMC)

Summary: The City of Everett Community, Planning and Economic Development Department administers the land use code that regulates the type and scale of development within the City. The following is an overview of the zoning and development code requirements for the Park District site, together with discussion of project consistency with these regulations.

Existing Zoning – According to the Everett Municipal Code, the Park District site is currently zoned UR3, Urban Residential 3. The primary purpose of the UR3 zone is to provide for multiple-family residential use at medium densities. In this zone, commercial uses are generally prohibited. The maximum building height allowed in the UR3 zone is 50 ft, and the maximum number of floors allowed is four.

Discussion: Proposed development under Alternatives 1 and 2 would include multi-family residential uses at medium and high densities, as well as non-residential uses. Approval of a PDO would be required for the maximum building height proposed under
Alternative 1 (15 floors) and the non-residential uses under both Alternatives 1 and 2 (70,600 GSF of retail, civic/service, and office uses).

**Planned Development Overlay**

**Summary:** A planned development overlay (PDO) is a mechanism for a property owner to propose a residential, commercial, industrial, or mixed-use development that is innovative or otherwise beneficial to the community, but which does not strictly comply with the provisions of the zone in which the property is located. The PDO is intended to promote high quality developments which benefit the city more than would a development which complies with specific requirements of the land use code.

PDO’s in MU zones must have a minimum lot area of one acre. PDO’s may allow the following development standards to be modified: 1) building setbacks; 2) height of building or structure; 3) required off-street parking spaces; 4) landscaping requirements; 5) sign requirements; 6) standards specified in the special regulations or footnotes of the use tables; 6) lot size; 8) lot width; 9) design and development standards; 10) residential increase of up to fifteen percent greater than the density would be allowed pursuant to Chapter 19.06 without the planned development overlay if: a) the design quality of the development offsets the impact of the increase in density; and b) the increase in density is compatible with existing uses in the immediate vicinity of the subject property.

**Discussion:** A PDO application has been prepared and submitted to the City of Everett for the mixed-use development under the Proposed Action. The application describes how the project would meet the PDO criteria. It also indicates the development standards that are proposed to be modified.
3.7 HOUSING

This section of the DEIS describes the housing conditions on and near the Park District site. Potential impacts from redevelopment of the EIS alternatives are evaluated and mitigation measures identified.

Methodology

Information and analysis in this section is largely based on review of U.S. Census data (2017-2021, American Community Survey, 5-year estimates), housing studies, Everett 2035 Comprehensive Plan, and the 2021 Buildable Lands Report for Snohomish County.

3.7.1 Affected Environment

This sub-section describes the existing housing conditions on and near the Park District site.

Site

The site is currently vacant and occupied by a former affordable housing development that previously contained low density multifamily residential units, recreational space (play areas and a community garden), and open space/landscaping. A total of 244 individual residential units were included in the buildings on the Park District site and Madrona Square site to the south (both owned by EHA).

Site Vicinity

The Park District site is located in the Delta neighborhood in northeast Everett. The site vicinity is comprised of residential, school, institutional, open space, and recreational uses (see Section 3.6, Land Use / Relationship to Plans and Policies, for details).

To characterize existing conditions, housing data are provided for the Park District site vicinity and are compared to the city of Everett as a baseline. The Park District vicinity is defined as the U.S. Census Tract in which the site is located (census tract 402). (See Figure 3.7-1, Census Tract Map).

Table 3.7-1 presents the number of housing units within the Park District vicinity and within the city of Everett, for comparison purposes. The majority of the housing supply in the vicinity is multifamily housing consisting of two or more units per structure (71.4%). Comparatively, 50.5% of housing units in the city of Everett are multifamily housing. Housing in the Park District vicinity is 28.2% owner-occupied and 71.8% renter occupied. The 28.2% rate for owner-occupied units is much lower than the city of Everett’s rate of 48.3%.
Table 3.7-1  
HOUSING CHARACTERISTICS – PARK DISTRICT VICINITY

<table>
<thead>
<tr>
<th></th>
<th>Park District Vicinity</th>
<th>City of Everett</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Housing Units</td>
<td>2,626</td>
<td>46,310</td>
</tr>
<tr>
<td>Occupied Units</td>
<td>2,479 (94.4%)</td>
<td>43,656 (94.3%)</td>
</tr>
<tr>
<td>Vacant Units</td>
<td>147 (5.6%)</td>
<td>2,654 (5.7%)</td>
</tr>
<tr>
<td>Owner Occupied</td>
<td>698 (28.2%)</td>
<td>21,083 (48.3%)</td>
</tr>
<tr>
<td>Renter Occupied</td>
<td>1,781 (71.8%)</td>
<td>22,573 (51.7%)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Housing Units Per Structure</th>
<th>Park District Vicinity</th>
<th>City of Everett</th>
</tr>
</thead>
<tbody>
<tr>
<td>1, detached</td>
<td>649 (24.7%)</td>
<td>20,804 (44.9%)</td>
</tr>
<tr>
<td>1, attached</td>
<td>101 (3.8%)</td>
<td>2,146 (4.6%)</td>
</tr>
<tr>
<td>2</td>
<td>178 (6.8%)</td>
<td>2,302 (5.0%)</td>
</tr>
<tr>
<td>3 – 4</td>
<td>409 (15.6%)</td>
<td>3,463 (7.5%)</td>
</tr>
<tr>
<td>5 – 9</td>
<td>288 (11%)</td>
<td>3,999 (7.6%)</td>
</tr>
<tr>
<td>10 - 19</td>
<td>46 (1.8%)</td>
<td>3896 (8.4%)</td>
</tr>
<tr>
<td>20 or more</td>
<td>857 (32.6%)</td>
<td>8622 (18.6%)</td>
</tr>
<tr>
<td>Mobile home</td>
<td>98 (3.7%)</td>
<td>1551(3.3%)</td>
</tr>
<tr>
<td>Boat, RV, van, etc.</td>
<td>0</td>
<td>27 (0.1%)</td>
</tr>
</tbody>
</table>

Source: Census Bureau, 2021, American Community Survey, 5-year estimates.  
1 The Park District Vicinity is defined as Census Tract 402.

Rent/Income-Restricted Housing in Everett
According to the Housing Consortium of Everett and Snohomish County, there were approximately 4,423 income-restricted homes in the City of Everett in 2018. The breakdown of homes by income level is detailed in Table 3.7-2. As shown, the majority of income-restricted homes are for residents with incomes between 31-50% of the average median income (AMI), and 51-60% of the AMI. The Census median household income based on the 2021 American Community Survey is $41,319 in Census Tract 402, compared to $71,357 for the city of Everett as a whole.

Table 3.7-2
LOW INCOME HOUSING INVENTORY – CITY OF EVERETT

<table>
<thead>
<tr>
<th>Homes by Income Level Served</th>
<th>Number of Homes</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-30% AMI</td>
<td>1,207</td>
</tr>
<tr>
<td>31-50% AMI</td>
<td>1,558</td>
</tr>
<tr>
<td>51-60% AMI</td>
<td>1,391</td>
</tr>
<tr>
<td>61-80% AMI</td>
<td>267</td>
</tr>
<tr>
<td>Total Income-Restricted Homes</td>
<td>4,423</td>
</tr>
</tbody>
</table>


According to the Everett Housing Action Plan, Everett’s existing housing supply is not meeting demand at all economic levels, especially for low-income households. Homeownership opportunities and access to alternative housing types are lacking, and the
supply of affordable housing is not meeting the need. The lack of affordable options is also contributing to a high percentage of cost burdened households within the City.

Existing affordable housing needs in the City are projected in the *Housing Snohomish County Project* report of 2018 and shown in Table 3.7-3. Cost burdened is defined as paying more than 30% of household income for housing (rent or mortgage, plus utilities). Severe cost-burdened is defined as paying more than 50% of household income for housing. As shown, approximately 67% of low-income households were cost-burdened in the City of Everett in 2018.

### Table 3.7-3
\textbf{COST-BURDENED LOW-INCOME HOUSEHOLDS – CITY OF EVERETT}

<table>
<thead>
<tr>
<th>Category</th>
<th>0-30% AMI</th>
<th>31-50% AMI</th>
<th>51-80% AMI</th>
<th>All</th>
</tr>
</thead>
<tbody>
<tr>
<td>TOTAL Households</td>
<td>8,970</td>
<td>7,437</td>
<td>6,711</td>
<td>23,119</td>
</tr>
<tr>
<td>Cost Burdened</td>
<td>1,629</td>
<td>3,968</td>
<td>2,365</td>
<td>7,962</td>
</tr>
<tr>
<td>Severely Cost-Burdened</td>
<td>5,647</td>
<td>1629</td>
<td>343</td>
<td>7,619</td>
</tr>
<tr>
<td>Total Cost-Burdened, %</td>
<td>81%</td>
<td>75%</td>
<td>40%</td>
<td>67%</td>
</tr>
</tbody>
</table>


**City Housing Targets**

The 2021 *Buildable Lands Report for Snohomish County* identifies a housing target of 70,067 units for the City of Everett by 2035. This is a nearly 50% increase (an additional 23,185 units) from the 2019 estimated housing supply of 46,882 units.

The *Everett 2035 Comprehensive Plan* indicates that the majority of new residential development in the City would need to be multifamily residential housing and infill development, because the city is largely built out. The Plan also notes that assuming the household income mix remained constant, 46% of new housing units would need to serve households at or below 50% of the AMI (8,763 to 13,823 new units). An approximately 7,410 additional units would need to be available at rent levels affordable to households with incomes at or below 80% AMI. The City of Everett is currently in the process of updating the Comprehensive Plan to plan for growth through 2044.

The *Rethink Housing Action Plan Project Everett, 2021* identifies the following housing needs for the City:

- 13,000 new housing units would need to serve low-income households, as follows:
  - 9,267 units < =50% HUD Area Median Family Income (HAMFI)
  - 3,529 units >50% to <=80% HAMFI
  - 9,981 units >80% HAMFI
3.7.2 Impact of the Alternatives

An analysis of the potential housing impacts of Alternative 1, the Proposed Action, is provided below. For the other alternatives, the analyses focus on any differences between the alternatives and Alternative 1 (other aspects of these alternatives are expected to be similar to Alternative 1).

Comparison of Housing Conditions Under the EIS Alternatives

This section provides a summary comparison of housing characteristics under Alternatives 1 and 2. Each alternative is described in more detail later in this section. Table 3.7-4 breaks down the number and type of housing units under Alternatives 1 and 2 at buildout in 2035, as well as the number of bedrooms for each type of housing.

Table 3.7-4
NUMBER AND TYPE OF HOUSING UNITS - ALTERNATIVES 1 and 2

<table>
<thead>
<tr>
<th>Category</th>
<th>Alternatives 1 and 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low-Density Multifamily (e.g., Townhouses)</td>
<td>35 units</td>
</tr>
<tr>
<td>High-Density Multifamily (e.g., Apartments)</td>
<td>1,465 units</td>
</tr>
<tr>
<td>• Affordable Housing</td>
<td>139 units</td>
</tr>
<tr>
<td>• Mixed-Income Housing</td>
<td>1,326 units</td>
</tr>
</tbody>
</table>

Bedroom Counts

| Total Multi-Family Housing                     | 1,500 units          |
| Townhouses                                    |                      |
| 2-Bedroom                                     | 3 units (9%)         |
| 3-Bedroom                                     | 26 units (74%)       |
| 5-Bedroom                                     | 6 units (17%)        |
| High-Density Multifamily                      |                      |
| Studios                                       | 265 units (20%)      |
| 1-Bedroom                                     | 796 units (60%)      |
| 2-Bedroom                                     | 265 units (20%)      |
| Affordable Units                              |                      |
| Studios                                       | 28 units (20%)       |
| 1-Bedroom                                     | 83 units (60%)       |
| 2-Bedroom                                     | 28 units (20%)       |

Bedroom Count Totals

| TOTALS                                        |                      |
| Studio                                        | 293 units (19.5%)    |
| 1-Bedroom                                     | 879 units (58.6%)    |
| 2-Bedroom                                     | 296 units (19.7%)    |
| 3-Bedroom                                     | 26 units (1.7%)      |
| 5-Bedroom                                     | 6 units (0.4%)       |

Alternative 1 – Proposed Action

Under Alternative 1, proposed redevelopment of the site would feature new residential, retail, civic/service, and office uses, as well as outdoor public amenities (see Figure 2-4, Site Plan – Alternative 1).

Alternative 1 would provide a total of up to 1,500 multifamily housing units in 15 buildings. The proposed buildings would be up to 15 stories.

Under Alternative 1, the total number of residential units onsite would increase from 0 (or 244 units under previous use of the Park District site and Madrona Square site) to 1,500 units. Density would increase from the former low-density housing to primarily medium- and high-density housing. Table 3.7-4 summarizes the proposed housing mix to be developed under Alternatives 1 and 2. As shown, under Alternative 1 the housing units would include 97.7% medium- and high-density multifamily units, and 2.3% low-density multifamily housing units. At this point, all of the housing units are assumed to be rentals; no units would be owned.

Of the total 1,500 units, 139 units would be affordable to support households with an income at or below 80% of the Area Median Income (AMI). The remaining 1,391 units would be mixed-income housing. These units would be offered to rent at a range of price points, including for workforce employees (e.g., police officers, firefighters, teachers, health care workers, retail clerks).

As currently envisioned, the majority of the of the 1,500 total units would contain 1 bedroom (approximately 58%), followed by units that would be studios or contain 2 bedrooms (approximately 20% each). Two (2) % of the units would contain 3- or 5-bedroom units and could be considered more suitable for families. (See Table 3.7-4.) With building heights of 15-stories, it is possible that space would be available to provide additional units with higher bedroom counts (i.e., over 2 bedrooms).

City Housing Needs.

The 1,500 housing units provided onsite under Alternative 1 would contribute towards meeting approximately 6.5% of the projected 23,185 additional housing units needed in the City by 2035 according to the Buildable Lands Report for Snohomish County. With 139 affordable units, Alternative 1 would also contribute towards meeting affordable housing targets identified in the current Comprehensive Plan, and the Everett Housing Action Plan. The additional housing would also help address the City’s goal of expanding the region’s housing stock to provide a range of affordable, healthy, and safe housing choices to every resident.²

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¹ Per the U.S. Department of Housing and Urban Development’s (HUD) Income Limits Documentation System, the 2022 AMI in the Seattle-Bellevue Fair Market Rent Area (which contains King County and Snohomish County) is $134,600.

² Everett 2035 Comprehensive Plan, Housing Element, p. 3.
**Relationship to Housing in Vicinity**

The additional 1,500 housing units on the Park District site would represent a large increase to the housing supply in the vicinity overall (census tract 402). Currently, there are 2,626 housing units in the vicinity (census tract 402), and this would increase the number of housing units by approximately 45.5% to 3,882 units.³

It is possible that the additional 1,391 market rate housing units added to the site under Alternative 1 could increase rental vacancy rates in the site vicinity. However, any such impacts, were they to occur, are anticipated to be temporary and not significant given the local and regional need for additional housing in the City of Everett and Snohomish County as outlined in the City’s Comprehensive Plan, the Everett Housing Action Plan, and the Buildable Lands Report for Snohomish County.

**Alternative 2 – Design Alternative**

Under Alternative 2, proposed redevelopment of the site would feature the same amount of new multifamily housing units (1,500 units) as Alternative 1. However, more buildings (two more) that are less tall (a maximum of ten stories) would be built onsite, resulting in greater site coverage. Less of the site would be in open space and less of the open space would be consolidated into a large, publicly accessible park.

The mix of low-density, medium-, and high-density housing, and affordable and mixed-income housing would be the same as Alternative 1, and overall housing impacts would be similar to Alternative 1. The housing provided under Alternative 2 would contribute to meeting the same percentages of the housing needs identified in the Buildable Lands Report for Snohomish County as Alternative 1 and would also achieve the same contributions towards meeting affordable housing targets identified in the current Comprehensive Plan, and the Everett Housing Action Plan. The mix of bedrooms per unit would also be the same as Alternative 1.

**Relationship to Housing in Vicinity**

The additional 1,500 housing units on the Park District site would represent an increase in the housing supply in the vicinity overall (census tract 402); the increase would be the same as Alternative 1. There are 2,626 housing units in the vicinity currently (census tract 402), and this would increase by approximately 8% to 3,084 units under Alternative 2.

The market rate housing units added to the site under Alternative 2 could temporarily impact rental vacancy rates in the site vicinity. However, as described for Alternative 1, such impacts (if they were to occur) are not anticipated to be significant given the local and regional need for housing identified in the City and County.

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³ This assumes the existing 244 units on-site are included in the housing unit tally for the census tract, resulting in 1,256 additional units provided as part of the project (1,500 new units – 244 existing units).
Alternative 3 – No Action Alternative

Under Alternative 3, the No Action Alternative, the site would remain in its existing condition. All the existing buildings and landscaping would remain for the time being, but demolition and removal of the buildings will ultimately occur under a separate action. Assuming future development under existing zoning, Alternative 3, could provide 458 low-density multifamily housing units; no non-residential uses would be included. Fewer new housing units would be provided than Alternatives 1 and 2, and no medium- or high-density housing would be included. More buildings that are less tall (up to four stories) would be built. More of the site would be in open space than under the other alternatives because the parcel west of Poplar Street would be unbuildable due to the required building setbacks. However, no large, publicly accessible park would be provided.

City Housing Needs
The 458 housing units provided onsite under Alternative 3 would contribute towards meeting some of the additional housing units needed in the City by 2035 according to the Buildable Lands Report for Snohomish County. However, with 458 units, Alternative 3 would contribute to providing approximately 2% of the estimated total units needed, as compared to 6.5% under Alternatives 1 and 2. The low-density multifamily housing would be less diverse than the mix of densities of housing under Alternatives 1 and 2. It is unknown what income levels the housing would serve.

Relationship to Housing in Vicinity
The additional 458 housing units on the Park District site would represent an increase in the housing supply in the vicinity overall (census tract 402). There are 2,626 housing units in the vicinity currently (census tract 402), and this would increase by approximately 8% to 3,084 units under Alternative 3.

The market rate housing units added to the site under Alternative 3 could temporarily impact rental vacancy rates in the site vicinity. However, similar to Alternatives 1 and 2, such impacts (if they were to occur) are not anticipated to be significant given the local and regional need for housing in the City and County.

Cumulative Impacts

Any new development occurring in the vicinity of the project site would be controlled by existing Comprehensive Plan policies and zoning regulations. It should be noted that the City of Everett is currently in the process of updating their Comprehensive Plan. In August 2023, the City Council approved three growth alternatives for analysis as part of the update process, including Alternative 1 – Extend Current Plans, Alternative 2 – Concentrated Growth Pattern, and Alternative 3 – Dispersed Growth Pattern. The City intends to complete

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4 This assumes the existing 244 units on-site are included in the housing unit tally for the census tract, resulting in 214 additional units provided as part of the project (458 new units – 244 existing units).
the update process in 2024 (see the City of Everett’s website for further details on their Comprehensive Plan Update process). Local development projects could occur at the same time as development of the Park District project. To the extent that other projects provide housing (including Madrona Square and other recently completed or underway projects), together with the Park District, they would cumulatively help satisfy the City’s targets for housing.

**Conclusion**

The site is currently vacant and occupied by a former affordable housing development that is scheduled to be removed. City of Everett’s existing housing supply is not meeting demand at all economic levels, especially for low-income households. Homeownership opportunities and access to alternative housing types are lacking, and the supply of affordable housing is not meeting needs.

All the EIS alternatives would provide new housing that would help address the deficiency of housing in Everett. Alternatives 1 and 2 would provide 1,500 mostly medium- and high-density housing units, that would be affordable and mixed-income housing. At this point, it is assumed that all the units would be rentals. Alternative 3 could provide 458 low-density housing units and would satisfy less of Everett’s housing needs.

3.7-3 **Mitigation Measures**

All three EIS alternatives would increase the supply of housing onsite as compared to existing (vacant) and previous conditions when the site was in active use (approximately 244 units). Alternatives 1 and 2 would provide the highest amount of housing (1,500 units) and Alternative 3 the least (458 units). No significant adverse housing impacts are expected to result from the redevelopment alternatives and as a result, no mitigation measures are identified.

3.7-4 **Significant Unavoidable Adverse Impacts**

No significant unavoidable adverse housing impacts are expected.
3.8 AESTHETICS / LIGHT AND GLARE

This section of the DEIS describes the aesthetic and light and glare condition on and near the Park District site. Potential impacts from development of the EIS alternatives on aesthetics/light and glare are evaluated and mitigation measures identified. This analysis is based on massing diagrams, cross-sections, view simulations, and shadow diagrams prepared by Framework in August 2023.

Methodology

Visual Character
For the aesthetics analysis in this DSEIS, the visual character of an area is assumed to consist of the unique and important aesthetic features that comprise the visual landscape. Both natural and built features combine to define a location’s visual character, including natural resources (topography, vegetation, geologic formations, wetlands, rivers, and other water resources), view corridors, vistas, parks, and landmark structures/districts.

Height, Bulk, and Scale
The DEIS height, bulk, and scale analysis used massing diagrams and cross-sections of the site prepared for Alternatives 1 and 2. These diagrams depict the change in massing under these alternatives, in the context of the surrounding neighborhood. Massing diagrams and cross-sections of Alternative 3 were not prepared, as future development under this alternative is speculative and no land use plans were created. The height, bulk, and scale impacts that could occur in the future with development under existing zoning are generally discussed.

Views
A view analysis was prepared for this DEIS based on photographs taken of the Park District site from selected viewpoints and photo simulations of proposed development under the EIS alternatives from these viewpoints. The viewpoints for the visual analysis were identified based on public places with possible views of the site, including public roadways/sidewalks and parks surrounding the site. Accordingly, eight (8) preliminary viewpoints were selected with the potential for site development to change the character of public views of the site. From these viewpoints, six (6) viewpoints were ultimately selected for simulation based on the ability to view both the context and proposed development and understand the relationships associated with potential view impacts (see Figure 3.8-1, Viewpoint Location Map). Photos were taken using a normal lens setting (51 mm) and assembled to show a horizontal view cone of approximately 60 degrees. 3D photo simulations of the views of site redevelopment under the EIS alternatives from the selected viewpoints were prepared to represent building massing based on site and building elevations, locations, building heights, open spaces, and street alignments. Revit software exported the digital model using the same simulated focal length (51 mm). The site and building forms were then rendered using Lumion software and composited within the
photos using Photoshop software. Representative landscaping (street trees) was also conceptually depicted in the simulations. The view analysis presented in this DEIS includes figures that incorporate the following:

- Photographs illustrating the existing visual condition as viewed from the respective viewpoints; and

- Simulations of building massing envelopes representing the extent of building massing visible from the respective viewpoint, consistent with assumed total building square footage, setbacks, and maximum heights and proposed topography. The building massing envelopes are those associated with the footprints illustrated in Figure 2-10, Land Use Plan – Alternative 1 and Figure 2-13, Land Use Plan – Alternative 2 in Chapter 2 of this DEIS and are intended to represent the general bulk and scale of proposed development under these alternatives. Photo simulations of Alternative 3 were not prepared, as future development under this alternative is speculative and no land use plans were created. The view impacts that could occur in the future with potential development under existing zoning are generally discussed.

**Shadows**

Potential shadow impacts from proposed development at the Park District site on nearby open spaces most used by the public were analyzed (e.g., parks and fields). Shadow diagrams were prepared that depict the potential shading impacts from the project, including on Wiggums Hollow Park, the Boys and Girls Club field, and Hawthorne Elementary fields. General shadow impacts on other primarily residential uses surrounding the site were also discussed. Shadow diagrams were prepared during the summer solstice (approximately June 21st), autumnal equinox (approximately September 21st), and winter solstice (approximately December 21st). Diagrams were prepared for three times of day (9 AM, 12 PM, and 3 PM) under Alternatives 1 and 2 to illustrate how shadows would transition across the site on each of the days referenced above and possibly impact the parks/fields (see Appendix G for each of the shadow diagrams prepared for this DEIS). As for views, shadow diagrams were not prepared for Alternative 3.

**Light and Glare**

Potential light and glare impacts were conceptually analyzed based on existing lighting levels, the type and sources of light under the EIS alternatives, and the potential for light/glare impacts on and near the Park District.
3.8.1 Affected Environment

This sub-section describes the existing aesthetics/light and glare conditions on and near the Park District site.

Visual Character
The existing visual character of Park District site is defined by its rolling topography, collection of low-scale buildings, and lawn/landscape areas. The existing buildings are typically minimalist, barracks-style in appearance and arranged in a grid pattern. A few large trees are present onsite.

To the north of the site, the visual character is defined by the open grassy playfield associated with Hawthorne Elementary School (to the northwest), a multifamily residential development, and grassy/forested areas in Wiggums Hollow Park. The visual character of the areas to the east of the site is defined by a single-family residential neighborhood on small (approximately 1/8-acre lots). To the south, the visual character is defined by the existing and under-construction Madrona Square multifamily residential development. To the southwest is the Bakerview multifamily residential building. To the west, vegetated open space associated with a large wetland dominates the visual character. Single-family residential homes are also present to the west. Areas to the west generally slope downward from the site.

Height, Bulk, and Scale
The existing low-density development onsite is comprised of 45 vacant one-story buildings. Everett Housing Authority (EHA) plans to demolish and remove these buildings under a separate action. Buildings surrounding the site include: North - two-story multifamily apartment buildings; East - one- to two-story, generally small-scale single-family homes; South - the Madrona Square multifamily residential development comprised of multiple three to four story buildings; Southwest – Bakerview Apartments, a seven-story multifamily residential building (the tallest building in the immediate site vicinity); and West - one- to two-story small to medium scale single-family homes. The tallest buildings near to the site are associated with the Providence Medical Center Hospital complex, approximately one-half miles to the west of the site. This hospital is a complex of buildings up to a maximum height of approximately 12 stories.

Views
Six viewpoints were selected as being most representative of area viewpoints and/or were determined to have the greatest potential for redevelopment on the Park District site to change the character of the view:

- **Viewpoint 1** – Looking Southeast from Hawthorne Elementary School (located northwest of the site);
- **Viewpoint 2** – Looking Southwest from Wiggums Hollow Park (located northeast of the site);
• **Viewpoint 3** – Looking West from 12th Street and Maple Street (located northeast of the site);
• **Viewpoint 4** – Looking West from E Marine View Drive and 13th Street (located to the east of the site);
• **Viewpoint 5** – Looking North from 15th Street and Pine Street (located to the southeast of the site); and
• **Viewpoint 6** – Looking North from 15th Street and Baker Avenue (located to the southwest of the site).

See Figure 3.8-1 for the locations of these viewpoints. Existing views toward the Park District site from these viewpoints are described below.

**Viewpoint 1 – Looking Southeast from Hawthorne Elementary School**

From Viewpoint 1, the existing view includes a large tree on the northwest corner of the Park District site, as well as the existing utility poles, stop lights, and utility wires in the foreground view. The existing on-site vacant buildings are in the mid-ground view, as well as additional trees and vegetation lining 12th Street to the east. Portions of other existing on-site and off-site buildings are also partially visible within the background view (see Figure 3.8-2).

**Viewpoint 2 – Looking Southwest from Wiggums Hollow Park**

From Viewpoint 2, the existing view includes a large open grassy area that is part of Wiggums Hollow Park, as well as existing utility poles and wires in the foreground view. The existing on-site vacant buildings are in the mid-ground view, as well as on-site vegetation and off-site trees adjacent to 12th Street to the west. Portions of other existing on-site buildings and trees are also partially visible within the background view (see Figure 3.8-3).

**Viewpoint 3 – Looking West from 12th Street and Maple Street**

From Viewpoint 3, the existing view includes single-family residential buildings in the adjacent neighborhood along 12th Street, as well as a large fir tree in the foreground view. The existing on-site vacant buildings that are lining 12th Street to the south are in the mid-ground view, as well as on-site vegetation and off-site trees adjacent to 12th Street to the north. Portions of other existing on-site buildings and trees are also partially visible within the background view, as well as taller buildings that are located closer to downtown in the distance (see Figure 3.8-4).
Viewpoint 1—From Hawthorne Elementary School Looking Southeast
Figure 3.8-3

Viewpoint 2—From Wiggums Hollow Park Looking Southwest
Viewpoint 3—Maple Street and 12th Street Looking East

Figure 3.8-4

Existing View

Proposed View
Alternative 1

Proposed View
Alternative 2
Viewpoint 4 – Looking West from E Marine View Drive and 13th Street

From Viewpoint 4, the existing view includes single-family residential buildings in the adjacent neighborhood near E Marine View Drive and 13th Street, as well as a number of large trees in the foreground view. Existing neighborhood single-family residential buildings lining 13th Street are in the mid-ground view, as well as additional trees and other vegetation located among the single-family buildings. Portions of the on-site vacant buildings are also partially visible within the background view in the distance (see Figure 3.8-5).

Viewpoint 5 – Looking North from 15th Street and Pine Street

From Viewpoint 5, the existing view from the corner of 15th Street and Pine Street includes a large fenced vacant lot that has been cleared of existing structures and vegetation in the foreground view. The Madrona Square multifamily residential development comprised of multiple three to four-story buildings is in the mid-ground view, as well as trees that are lining Pine Street to the north. Portions of other existing on-site vacant buildings and additional trees are also partially visible within the background view (see Figure 3.8-6).

Viewpoint 6 – Looking North from 15th Street and Baker Avenue

From Viewpoint 6, the existing view from the corner of 15th Street and Baker Avenue includes single-family residential buildings in the adjacent neighborhood, as well as the seven-story Bakerview Apartment building in the foreground view. Existing neighborhood single-family residential buildings lining Baker Avenue are in the mid-ground view, as well as additional trees and other vegetation located among the single-family buildings. Portions of the on-site vacant buildings are also partially visible within the background view in the distance to the east (see Figure 3.8-7).

Shadows

Everett’s SEPA Policies aim “to minimize the reduction of available natural light due to the casting of shadows by new development”. Factors that influence the extent of shading include: weather (e.g., cloud cover); building height, width, and facade orientation; and the proximity of other intervening structures, topographic variations, and significant landscaping. Generally, greater building heights extend the length of the shadow cast, and increased mass (or cross-sectional width) widens the shadow cast by a building. Shadows from tall buildings extend farther from a building, but their effects on more distant locations are of shorter duration, because the sun’s motion translates into faster movement of the shadow over the ground. Buildings with greater mass create wider shadows, and an increased amount of shaded area within the immediate area (e.g., adjacent streets, public spaces, etc.), but the reach of the shadow would be limited by the building’s height.

Figure 3.8-5

Viewpoint 4—E Marine View Dr and 13th Street Looking East
Existing View

Proposed View — Alternative 1

Proposed View — Alternative 2

Source: Framework, 2023

Viewpoint 6—15th Street and Baker Avenue Looking North
The project site is located in the City of Everett’s Delta Neighborhood. The site vicinity is generally comprised of residential, school, church, community center, and open space/recreational uses. Open space facilities to the west and northwest include a wetland (Wetland A), a play and sport field associated with the Girl’s and Boy’s Club, and Hawthorne Elementary School with associated play fields. Wiggums Hollow Park and associated skate park is located to the north. Other than a seven-story apartment building to the southwest (Bakerview Apartments) and multi-family residences to the north/northwest which are 3- and 4-stories, existing nearby buildings are generally one to two stories in height, with single-family and multifamily housing being the predominant nearby land use in all directions.

The closest public spaces to the Park District site are Wiggums Hollow Park (located to the north, across 12th Street), the Boys and Girls Club field (located one block to the west), and Hawthorne Elementary play field (located to the northwest, across 12th Street). Shadows from existing development on the Park District site are limited due to the lower building heights (one-story buildings).

**Light and Glare**

**Light**

**Site Lighting.** Current lighting conditions on the site are indicative of a less intensive urban residential setting, and light is emitted from both stationary and mobile sources. Pole-mounted lights are located along streets within and surrounding the site. The sidewalks and interior pathways that provide access to the residential entrances contain fixtures mounted to the facades of the buildings and under the entrance canopies (i.e., porch lights). As the site is presently vacant, outdoor lighting sources are illuminated for security purposes, but no indoor lighting is in use. Mobile light sources include vehicles travelling and parking on the site roadways.

The principal sources of existing light on and adjacent to the Park District site include streetlights on area roadways (i.e., 12th Street, Pine Street, 14th Street, 15th Street, and the streets internal to the street); vehicle headlights on area roadways; and building lighting (including interior lighting and exterior lighting). Existing buildings on the Park District site produce a minimal amount of light because the buildings are currently vacant. Existing light standards associated with the streetlight fixtures onsite are approximately 43 feet high on wood or steel poles.

**Surrounding Area Lighting.** The Delta neighborhood surrounding the site has nighttime lighting conditions that are generally similar in character to the Park District site. That is, light is emitted from both stationary and mobile sources including interior and exterior building lighting, street lighting, and vehicles traveling on and accessing parking on area roadways and private property. Lighting conditions to the north of the site, where
Hawthorne Elementary School and the Girl’s and Boy’s Club is located, are brighter and more constant. Also, the Boy’s and Girl’s Club field contains field lighting.

Glare

The primary sources of glare on and adjacent to the Park District site include light and reflective glare from glazing and other specular surfaces on vehicles traveling along area roadways, as well as light and reflective glare from glazing and other specular surfaces on existing buildings. Glare from existing buildings, paving, and vehicles on and near the Park District site is expected to be minimal, given the types of buildings and amount of traffic that is present.

3.8.2 Impacts of the Alternatives

An analysis of the potential aesthetic/light and glare impacts of Alternative 1, the Proposed Action, is provided below. For the other alternatives, the analyses focus on any differences between the alternatives and Alternative 1 (other aspects of these alternatives are expected to be similar to Alternative 1).

Alternative 1 - Proposed Action

Alternative 1 represents the Applicant’s proposed development of the Park District site. The approximately 16-acre site would be developed in the following land uses:

- **Residential** – up to 1,500 multifamily residential units;
- **Non-Residential** – up to 70,600 gross sq. ft. (GSF), broken down as follows:
  - Retail – 20,200 GSF;
  - Civic/Service – 26,400 GSF; and
  - Office – 20,000 GSF.
- **Open Space** – approximately 8.5 acres (53%) of the site, including an approximately 1.5-acre publicly accessible park.
- **Parking** – 1,018 structured parking spaces.

A total of 15 buildings would be constructed, four to a maximum of 15 stories in height.

See Chapter 2, including Table 2-1 and Figure 2-10, for a more complete summary of land uses under Alternative 1.

Proposed development would modify the existing visual character of the site, change the height/bulk/scale of development, impact views toward the site, create shadows, and add new sources of light and glare. Changes in aesthetic conditions are anticipated to occur incrementally over the approximately 12-year build-out of the site.
**Visual Character**

Proposed development under Alternative 1 would change the visual character of the site from the existing collection of barracks-style multifamily residential buildings to a large-scale, mixed-used development (including residential, retail, civic/service, and office uses, and parks/open space) that is intended to be cohesive, well-designed, and complementary to prevalent, common, and important design themes in the neighborhood. Development would consist of apartment and mixed-use buildings. Some townhouses or flats-style residential buildings could also be included. The landscape would be a key feature under Alternative 1, providing green edges/buffers along the perimeter and plantings in the interior of the site, including a large signature park. Views towards the mountains and water would be possible from proposed development onsite.

**Height, Bulk, and Scale**

The proposed mixed-use development under Alternative 1 would substantially increase the height, bulk, and scale of buildings on the Park District site relative to existing conditions, and would place taller, more dense development in proximity to low and medium-density residential uses in the surrounding Delta neighborhood.

Proposed development under Alternative 1 would include a total of 15 buildings consisting of eight medium-density buildings from five to nine stories in height and four high-density buildings up to 15 stories in height; three low-density, two to three-story residential buildings could also be provided (see Figure 3.8-8, Building Heights – Alternative 1). The site is presently occupied by low-density, one-story multifamily residential buildings. Therefore, proposed development would increase the building height across the site; the possible low-density residential buildings would be similar in height to the existing low-density buildings onsite (as mentioned previously, the existing buildings will be removed under a separate action).

Proposed development would be located in proximity to existing low-density, two- to three-story single-family and multifamily residential buildings on all sides of the site. The proposed high-density buildings (up to 15 stories) would be situated in the south part of the site (near Madrona Square) and the central site area, away from adjacent single-family residences. Proposed medium-density buildings (from five to seven stories) would be located in the north, east, south, and central site areas. The medium-density buildings in the east part of the site would be adjacent to single-family residences. The possible low-density buildings (two to three stories) would be in the southeast and southwest parts of the site, near adjacent single-family residences. (See Figure 3.8-8 and the Development Cross Sections in Appendix G). To minimize the impacts of increased height, the maximum building height along the edges of the site would be 28 feet within a 35-foot horizontal distance from the adjacent R2 zone. The R2 zone adjoins the site along two-thirds of the site boundary to the east, a small area adjacent to the site panhandle to the south, and the entire site boundary to the west (see Figure 3.6-3, Zoning Map in Section 3.6, Land Use / Relationship to Plans and Policies).
Building Height Diagrams—Alternative 1

Key

3 Indicates the number of floors for buildings based on the proposed Planned Development Overlay Zoning as calculated relative to the first floor at the main building entrances.

North
The overall bulk and scale of proposed development under Alternative 1 would be considerably greater than the existing development onsite and in the surrounding area (see Figure 3.8-9, Building Massing Diagrams – Alternative 1). The proposed development would be similar in bulk/scale to the Providence Medical Center Hospital complex about one-half mile west of the site.

Several features of proposed development are designed to reduce height, bulk, and scale impacts on the surrounding area, particularly on the adjacent single-family residences. These features include the proposed layout of land uses (as described above); proposed open space, setbacks, design standards; and proposed landscaping incorporated into the site plan. Existing physical barriers within and adjacent to the site (e.g., roadways and topography) would also help lessen height/bulk/scale impacts. (See Section 3.6, Land Use / Relationship to Plans and Policies, for details.) As a result, significant height/bulk/scale impacts are not expected.

**Views**

The following summarizes potential changes to view conditions that could occur with redevelopment on the Park District site under Alternative 1.

**Viewpoint 1 – Looking Southeast from Hawthorne Elementary School**

Under Alternative 1, the existing foreground view would remain unchanged, but new development on the Park District site would be visible within the mid-ground and background views. Medium-density and high-density mixed-use buildings would be visible in the mid-ground view to the south of 12th Street. The medium-density buildings would generally be up to six stories in height with the high-density buildings up to 15 stories in height. To the east of these buildings would be additional medium-density mixed-use buildings in the background view, which would be roughly seven stories in height, but these buildings would largely be obstructed from view from this location by the proposed mixed-use buildings in the mid-ground view (see Figure 3.8-2).

**Viewpoint 2 – Looking Southwest from Wiggums Hollow Park**

Under Alternative 1, the existing foreground view would remain unchanged, but new development on the Park District site would be visible within the mid-ground and background views. Medium-density and high-density mixed-use buildings would be visible in the mid-ground view to the south of 12th Street, as well as proposed street trees along 12th Street. The medium-density buildings would generally be seven stories in height and the high-density buildings would be up to 15 stories in height. To the south of these buildings would be additional medium-density and high-density mixed-use buildings in the background view varying from seven to 15 stories in height, but these buildings would largely be obstructed from view in this location by the proposed mixed-use buildings in the mid-ground view (see Figure 3.8-3).
Building Massing Diagrams—Alternative 1

1. MASSING MODEL VIEWED FROM THE NORTHWEST

2. MASSING MODEL VIEWED FROM THE NORTHEAST

3. MASSING MODEL VIEWED FROM THE SOUTHWEST

4. MASSING MODEL VIEWED FROM THE SOUTHEAST
Viewpoint 3 – Looking West from 12th Street and Maple Street

Under Alternative 1, the existing foreground view would remain unchanged, but new development on the Park District site would be visible within the mid-ground and background views. Medium-density mixed-use buildings would be visible in the mid-ground view to the south of 12th Street, as well as proposed street trees along 12th Street. The medium-density buildings would generally be seven stories in height. To the west of these buildings would be additional medium-density and high-density mixed-use buildings in the background view varying from six to 15 stories in height, but these buildings would largely be obstructed from view in this location by the proposed mixed-use buildings in the mid-ground view. The taller buildings that are located closer to downtown would be obscured in the background view from this viewpoint as well (see Figure 3.8-4).

Viewpoint 4 – Looking West from E Marine View Drive and 13th Street

Under Alternative 1, the existing foreground view would remain unchanged, but new development on the Park District site would be visible within the mid-ground and background views. Medium-density and high-density residential buildings would be visible in the mid-ground view on the Park District site to the south of 13th Street; medium-density mixed-use residential buildings located on the Park District site to the north of 13th Street would be obscured in this view by existing tall trees in the adjacent residential neighborhood. The park area that would be located onsite between the residential and mixed-use buildings would largely be obstructed from view in this location by existing and proposed mature trees and single-family houses in the adjacent neighborhood. The medium-density residential buildings would generally be from seven to nine stories in height. To the south of these buildings would be additional medium-density and high-density residential buildings in the background view varying from seven to 15 stories in height, but these buildings would largely be obstructed from view in this location by the proposed residential buildings in the mid-ground view, as well as by existing mature trees in the adjacent neighborhood (see Figure 3.8-5).

Viewpoint 5 – Looking North from 15th Street and Pine Street

Under Alternative 1, the existing foreground view would change to include new development on the Park District site. Low-density and medium-density residential buildings would be visible in the foreground view to the west of Pine Street and to the north of 15th Street, as well as proposed street trees. The low-density buildings would be roughly three stories in height, while the medium-density buildings would generally range from six to seven stories in height. To the north of these buildings would be additional medium-density and high-density residential buildings in the mid-ground and background views, varying from seven to 15 stories in height, but these buildings would largely be obstructed from view in this location by the proposed residential buildings in the foreground view (see Figure 3.8-6).
Viewpoint 6 – Looking North from 15th Street and Baker Avenue

Under Alternative 1, the existing foreground view would remain unchanged, but new development on the Park District site would be visible within the mid-ground and background views. High-density residential buildings would be visible in the mid-ground view to the north of 14th Street and to the east of Poplar Street. The high-density buildings would be up to 15 stories in height. To the north of these buildings would be additional medium-density and high-density residential buildings in the mid-ground and background views, varying from seven to 15 stories in height, but these buildings would largely be obstructed from view in this location by the proposed residential buildings in the foreground view (see Figure 3.8-7).

**Shadows**

This section of the DEIS analyzes shadow diagrams contained in Appendix G that depict shading that would occur with development of Alternative 1 for vernal equinox (approx. March 21st), summer solstice (approx. June 21st), autumnal equinox (approx. Sept. 21st), and winter solstice (approx. December 21st). The figures in Appendix G and accompanying text below focus on and describe possible shadow impacts to off-site public open space areas (Wetland A, the Boy’s and Girl’s Club fields, Hawthorne Elementary School field, and Wiggums Hollow Park and Skate Park), and key on-site open space areas, that could result from full-buildout of the EIS alternatives, with consideration of shading that already occurs from existing buildings that would remain. The analysis also considers shading that could occur to residential uses that are present surrounding the site.

The following analysis summarizes shadow impacts for three times of the day on each of the key days of the solar year. These key days of the solar year and times of the day depict worst-case impacts. However, shadow-related impacts can also occur at other times of the day throughout the year. Because of the earth’s rotation, the duration of shadow-related impacts varies for a stationary observer based on season and depending upon the width of the shadow. The shadow graphics that are included in Appendix G have been adjusted to compensate for topography and, in the case of vernal equinox, summer solstice, and autumnal equinox, daylight savings time.

Future development and associated landscaping on the site under Alternative 1 would generate shadows over adjacent portions of the Delta neighborhood and surrounding streets. In general, the time of greatest shading would occur during periods when the sun is at a low-angle, including mid- to late afternoon in the winter and late afternoon to early evening in the summer.

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2 NOAA defines a clear day as one with zero to 3/10 average sky cover, a partly cloudy is one with 4/10 to 7/10 tenths average sky cover and a cloudy day is on
2 NOAA defines a clear day as one with zero t
3 Pacific Daylight Savings Time (PDST) applies to shadow impacts associated with spring equinox, summer solstice and autumnal equinox.
Vernal (Spring) Equinox

Sunrise on vernal equinox (approx. March 21st) occurs at about 6:11 AM and sunset at 6:21 PM.

The extent of possible shading from the Alternative 1 should be considered within the context of climatic data for the month (e.g., on average, the number of clear, partly cloudy, and cloudy days). Data\(^4\) indicates that on average March has four clear days, eight partly cloudy days and 19 cloudy days.\(^5\)

As indicated by the diagrams in Appendix G for the vernal equinox, potential impacts of shadows from development under Alternative 1, together with shadows from other nearby buildings, were evaluated at 9 AM, 12 PM, and 3 PM. Pacific Daylight Savings Time is in effect on this day.

- **At 9 AM**, shadows from development under Alternative 1 would extend in a northwesterly direction and would shade small areas of Wetland A, the Boy’s and Girl’s Club fields, and the southeast corner of the Hawthorne Elementary Playfield located west/northwest of the site. Overall, the majority of the open space areas to the west of the site would remain unaffected by shading from Alternative 1, and shading impacts would not be considered significant. The on-site publicly accessible park would be partially shaded (approximately one-third of the park would be affected). Some residences present to the west of Poplar Street would also be shaded at this time of day. Overall, shading impacts are not considered significant.

- **At 12 PM**, shadows from development under Alternative 1 would extend in a northerly direction but would not affect open space areas to the north of the site (i.e., Wiggins Hollow Park). Approximately half of the publicly accessible on-site park would be shaded. No significant shading to off-site residences is anticipated.

- **At 3 PM**, shadows from development under Alternative 1 would extend in a northeasterly direction and would not affect open space areas in the site vicinity. Approximately half of the publicly accessible on-site park would be shaded. Some residences to the east of Fir Street would be shaded.

Summer Solstice

Sunrise on summer solstice (approx. June 21st) occurs at about 5:11 AM and sunset at 9:10 PM. Pacific Daylight Savings Time remains in effect on this day.

\(^4\) NOAA, 2005.
\(^5\) NOAA defines a clear day as one with zero to 3/10 average sky cover, a partly cloudy is one with 4/10 to 7/10 tenths average sky cover and a cloudy day is one with 8/10 to 10/10 tenths average sky cover.
Climatic data for the month of June indicates that on average June has seven clear days, eight partly cloudy days, and 15 cloudy days.

As indicated by the diagrams in Appendix G for summer solstice, potential impacts from shadows from Alternative 1, together with shadows from other nearby buildings, were evaluated at 9 AM, 12 PM, and 3 PM.

- **At 9 AM**, shadows from development under Alternative 1 would extend in a westerly direction and would not affect off-site open spaces areas located to the west of the site (i.e., Wetland A, Boy’s and Girl’s Club fields, or Hawthorne Elementary fields), or the on-site publicly accessible park. Some residences present to the west of Poplar Street would be affected by shading at this time of day; however, impacts are not considered significant.

- **At 12 PM**, shadows from development under Alternative 1 would extend in a northerly direction and would not affect open space areas to the north of the site (i.e., Wiggums Hollow Park) or the on-site publicly accessible park. No significant shading to off-site residences is anticipated.

- **At 3 PM**, shadows from development under Alternative 1 would extend in an easterly direction and would not affect open space areas in the site vicinity or the on-site publicly accessible park. Several residences to the east of Fir Street would be minimally shaded. Overall, shading impacts are not considered significant.

**Autumnal Equinox**

Sunrise on autumnal equinox (approx. September 21st) occurs at about 6:13 AM and sunset at 8:11 PM. Pacific Daylight Savings Time remains in effect on this day.

Climatic data for the month of September indicate that on average September has three clear days, six partly cloudy days, and 22 cloudy days.

As indicated by the diagrams in Appendix G for autumnal equinox, potential impacts from shadows from buildings that would be built under Alternative 1, together with shadows from other nearby buildings, were evaluated at 9 AM, 12 PM, and 3 PM.

- **At 9 AM**, shadows from development under Alternative 1 would extend in a westerly direction and would shade a small segment of the east wetland edge. Shading would not affect the Boy’s and Girl’s Club fields or Hawthorne Elementary fields. Likewise, the on-
site publicly accessible park would not be affected by shading at this time of day. Some residences to the west of Poplar Street would be affected by shading at this time of day; however, impacts are not considered significant.

- **At 12 PM**, shadows from development under Alternative 1 would extend in a northerly direction and would not affect open space areas to the north of the site. Approximately half of the publicly accessible on-site park would be shaded. A portion of the yard area of a multifamily residence to the north of the site would be partially shaded. Overall, however, no significant shading to off-site residences is anticipated.

- **At 3 PM**, shadows from development under Alternative 1 would extend in a northeasterly direction and would not affect open space areas in the site vicinity. The on-site publicly accessible park would be approximately half shaded. Several residences to the east of Fir Street would be partially shaded. Overall, off-site shading impacts are not considered significant.

**Winter Solstice**

Sunrise on winter solstice (approx. December 21st) occurs at about 7:54 AM and sunset at 4:19 PM. Climatic data\(^9\) for the month of December indicate that on average December has three clear days, four partly cloudy days, and 23 cloudy days.\(^10\)

As indicated by the diagrams in Appendix G, for winter solstice, potential impacts from shadows from development under Alternative 1, together with shadows from other nearby buildings, were evaluated at 9 AM, 12 PM and 3 PM.

- **At 9 AM**, shadows from development under Alternative 1 would extend in a northwesterly direction and would shade a small segment of the off-site Wetland A to the west. Over half of the Boy’s and Girl’s Club fields and the majority of the Hawthorne Elementary School fields would also be shaded by project buildings. Likewise, the on-site publicly accessible park would be over half shaded at this time of day. A number of residences present to the north and northwest of site would be affected by shading at this time of day. As shown by the graphics in Appendix G, although shading from Alternative 1 would be extensive at this time of day, much of the surrounding area is already cast in shadows due to the early morning hour, the position of the sun in the sky at this time of year, and the subsequently long length of shadows thatresultingly occur in the winter.

- **At 12 PM**, shadows from development under Alternative 1 would extend in a northerly direction and would not affect open space areas to the north of the site. However, the

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\(^9\) op cit.

\(^10\) NOAA defines a clear day as one with zero to 3/10 average sky cover, a partly cloudy is one with 4/10 to 7/10 tenths average sky cover and a cloudy day is one with 8/10 to 10/10 tenths average sky cover.
publicly accessible on-site park would be entirely shaded. Some residences to the north of the site (north of 12th Street) would also be affected by shading at this time of day. Overall, however, shading impacts to off-site residences are not considered significant.

- **At 3 PM**, shadows from development under Alternative 1 would extend in a northeasterly direction and would not affect off-site open space areas in the vicinity. The on-site publicly accessible park would be entirely shaded. A number of residences to the north and northeast of the site could also be affected by shading from Alternative 1. Overall, off-site shading impacts to residences are not considered significant due to the time of year at which shading would be occurring. That is, in the winter when there are many rainy and cloudy days when less use of outdoor areas is expected.

**Summary**

As demonstrated by the shadow diagrams, new buildings constructed under Alternative 1 are not expected to contribute to significant additional shading of off-site open space areas to the west and northwest (i.e., Wetland A, the Boy’s and Girl’s Club fields and Hawthorne Elementary School fields). A minor amount of shading could occur in the mornings at 9 AM during the vernal and autumnal equinox and extensive shading could occur at 9 AM on the winter solstice. Although the shading on winter solstice would be extensive, given the time of day and time of year that the shading would occur, impacts are not considered significant. This is because less use of outdoor areas is expected to occur in the winter when temperatures are generally lower, rainy days are frequent, and there are fewer clear days.

According to the shadow diagrams, no shading from the project would affect Wiggums Hollow Park to the north on the times of day/days of the year that were evaluated for this analysis.

Some shading could occur to the publicly accessible on-site park with partial shading occurring during the spring and fall equinoxes (ranging from one-quarter to over half of the park affected). However, the park would largely be unaffected by shading on the summer solstice at all times of day. This would likely be the time of the year when the highest use of the park is anticipated due to the limited rainy days and high number of clear days. Therefore, shading impacts to the on-site publicly accessible park are not considered significant overall.

Shading of nearby off-site residences to the west, north, and east could also periodically occur with development of Alternative 1. Off-site impacts would be very minimal in the summer months.
Light and Glare

Construction

New temporary sources of light would be introduced to the site during construction activities over the phased buildout of the site. The lighting sources would be associated with infrastructure and building construction, lighting of the job site (to meet safety requirements), trucks, and other equipment. Construction lighting could potentially be noticeable in certain areas proximate to the site. Also, glare could reflect off construction vehicles and equipment, and construction-related vehicle headlights could at times produce light and glare when accessing the site from area roadways. While noticeable, such lighting is not expected to cause significant impacts. Construction lighting could be shielded from on and off-site residential buildings, and lighting associated with construction activities would be limited by City of Everett regulations which limit activities during nighttime hours.

Operation

Redevelopment of the site under Alternative 1 would add a variety of sources of light and glare to the site.

Following redevelopment, new residential, retail, civic/service, and office uses would result in new light sources on the site under Alternative 1. Stationary sources of light produced by the project would include interior and exterior building lighting; commercial sign lighting; pedestrian level lighting along pathways, landscaping and the publicly accessible park; and street lighting that is required under City code. Mobile sources would include light and glare from vehicle headlights associated with vehicles entering and exiting structured below-ground parking areas from area roadways, and to a lesser degree, vehicles accessing on-street parking. Vehicle headlights are anticipated to have minimal impact on surrounding properties since off-street parking would be mostly integrated into structures and most streets face north-south, away from the residential areas to the east and west.

Light levels would be generally higher in the evenings and during the winter months, when there are more hours of darkness. Given the mix of uses including residential and commercial uses, nighttime lighting levels would be higher. Redevelopment under Alternative 1 would result in the elimination of many of the existing sources of light on the site; however, because the overall level of redevelopment on the site and the number of vehicles traveling through the site would be greater than under existing conditions, the overall level of light on the site would increase.

To manage potential nighttime lighting impacts, illumination would be shielded from the night sky and would generate minimal light spillage across property lines. Also, property-line setbacks and landscaping at the site edges would help to minimize light spillage. Signs would comply with illumination standards proposed to be included in the Development
Agreement. Significant light impacts are not anticipated with implementation of these measures.

New sources of glare on the site under Alternative 1 could include reflection from building facades, windows, and pavement, and reflections from vehicle traffic. Specific glare impacts would depend upon the degree of reflective surfaces (e.g., glass windows) selected for building facades. Street-level and upper floor uses containing office and/or commercial uses would likely include some degree of glass exteriors and could produce more glare than other uses. The amount of glare generated would be typical of urban development and is not expected to be significant.

**Alternative 2 - Design Alternative**

Under Alternative 2, proposed redevelopment of the site would feature the same amounts of new residential units, and retail, civic/service, and office uses as Alternative 1. However, 17 buildings (two more than Alternative 1), four with lower maximum heights (10 stories) than Alternative 1, would be built onsite, resulting in greater site coverage. Less of the site would be in open space and less of the open space would be consolidated into a large, publicly accessible park. (See Figure 2-13, Land Use Plan – Alternative 2.)

**Table 2-2** provides an overview of development under Alternative 2.

**Visual Character**

Like Alternative 1, proposed development under Alternative 1 would change the visual character of the site from the existing collection of barracks-style multifamily residential buildings to a large-scale, mixed-used development that is intended to be cohesive and well-designed. Development would consist of medium and high-density buildings. More medium-density buildings would be included than under Alternative 1, and the high-density buildings would not be as tall. Some low-density townhouse or flats-style buildings could also be included in the southwest and southeast portions of the site.

Similar to Alternative 1, the landscape would be a key feature under Alternative 2, providing green edges/buffers along the perimeter and plantings in the interior of the site. However, there would be no large signature park in the center of the site. Views towards the mountains and water would be possible from proposed development onsite.

**Height, Bulk, and Scale**

Similar to Alternative 1, the proposed mixed-use development under Alternative 2 would also substantially increase the height, bulk, and scale of buildings on the Park District site relative to existing conditions, and would place taller, more dense development in proximity to the low and medium-density residential uses in the surrounding Delta neighborhood.

Proposed development under Alternative 2 would include a total of 17 buildings consisting of eight medium-density buildings from five to nine stories in height and six high-density
buildings up to 10 stories in height; three low-density, two- to three-story residential buildings could also be provided (see Figure 3.8-10, Building Heights – Alternative 2). The site is presently occupied by low-density, one-story multifamily residential buildings. Therefore, proposed development would increase the building height across the site; the possible low-density buildings would be similar in height to the existing buildings (as mentioned previously, the existing buildings will be removed under a separate action).

Similar to Alternative 1, proposed development would be located in proximity to existing low-density, two- to three-story single-family and multifamily residential buildings on all sides of the site. The proposed high-density buildings (up to 10 stories) would be situated in the south part of the site (nearer to Madrona Square) and the central portion of the site, away from adjacent single-family residences. Proposed medium-density buildings (from five to nine stories) would be located in the north, east, south, and central site areas. The medium-density buildings in the east part of the site would be adjacent to adjacent single-family residences. The possible low-density buildings (two to three stories) would be in the southeast and southwest parts of the site, near adjacent single-family residences. (See Figure 3.8-10 and the Development Cross Sections in Appendix G). Like Alternative 1, along the edges of the site, the maximum building height would be 28 feet within a 35-foot horizontal distance from adjacent R2 zone. The R2 zone adjoins the site along two-thirds of the site boundary to the east, a small area adjacent to the site panhandle to the south, and the entire site boundary to the west (see Figure 3.6-3, Zoning Map in Section 3.6, Land Use / Relationship to Plans and Policies).

The overall bulk and scale of the proposed development under Alternative 2 would be considerably greater than the existing development onsite and in the surrounding area (see Figure 3.8-11, Building Massing Diagrams – Alternative 2). The proposed development would be similar in bulk/scale to the Providence Medical Center Hospital complex about one-half mile west of the site.

With the addition of the two 10-story medium-density residential buildings to the central park area under Alternative 2, this alternative would result in more intensive development on the project site and less open space as compared to Alternative 1. Similar to Alternative 1, several features of proposed development are designed to reduce height, bulk, and scale impacts on the surrounding area, particularly to the adjacent single-family residences. These features include the proposed layout of land uses (as described above); proposed open space, setbacks, and design standards; and proposed landscaping incorporated into the site plan. Also, existing physical barriers within and adjacent to the site (e.g., roadways and topography) would help lessen height/bulk/scale impacts. (See Section 3.6, Land Use / Relationship to Plans and Policies, for details.). As a result, significant height/bulk/scale impacts are not expected.
Figure 3.8-10
Building Height Diagrams—Alternative 2

Key

Indicates the number of floors for buildings based on the proposed Planned Development Overlay Zoning as calculated relative to the first floor at the main building entrances.

Indicates main building entrance.
Figure 3.8-11
Building Massing Diagrams—Alternative 2

1. MASSING MODEL VIEWED FROM THE NORTHWEST

2. MASSING MODEL VIEWED FROM THE NORTHEAST

3. MASSING MODEL VIEWED FROM THE SOUTHWEST

4. MASSING MODEL VIEWED FROM THE SOUTHEAST
**Views**

The following summarizes potential changes to view conditions that could occur with redevelopment on the Park District site under Alternative 2.

**Viewpoint 1 – Looking Southeast from Hawthorne Elementary School**

Like Alternative 1, under Alternative 2, the existing foreground view would remain unchanged, but new development on the Park District site would be visible within the mid-ground and background views. Views under Alternative 2 would be the same as those depicted for Alternative 1 from this viewpoint (see Figure 3.8-2).

**Viewpoint 2 – Looking Southwest from Wiggums Hollow Park**

Similar to Alternative 1, the existing foreground view would remain unchanged, but new development on the Park District site would be visible within the mid-ground and background views. Views under Alternative 2 would be the same as those depicted for Alternative 1 from this viewpoint except for the western portion of the site. In this area, under Alternative 2, the high-density mixed-use buildings that are proposed would be 10 stories in height as opposed to 15 stories under Alternative 1, which would result in slightly less intensive development in this area (see Figure 3.8-3).

**Viewpoint 3 – Looking West from 12th Street and Maple Street**

Similar to Alternative 1, the existing foreground view would remain unchanged, but new development on the Park District site would be visible within the mid-ground and background views. Views under Alternative 2 would be similar to those depicted for Alternative 1 from this viewpoint except for the eastern portion of the site. In this area, medium-density residential buildings would be located in the center of the site (where a large park is proposed under Alternative 1), which would result in more intensive development in this area (see Figure 3.8-4).

**Viewpoint 4 – Looking West from E Marine View Drive and 13th Street**

Similar to Alternative 1, the existing foreground view would remain unchanged, but new development on the Park District site would be visible within the mid-ground and background views. Views under Alternative 2 would be similar to under Alternative 1 from this viewpoint except for the eastern portion of the site. In this area, medium-density residential buildings would be located in the center of the site (where a large park is proposed under Alternative 1), which would result in more intensive development in this area (see Figure 3.8-5).
**Viewpoint 5 – Looking North from 15th Street and Pine Street**

Like Alternative 1, under Alternative 2, the existing foreground view would change to include new development on the Park District site. Views under Alternative 2 would be the same as those depicted for Alternative 1 from this viewpoint (see Figure 3.8-6).

**Viewpoint 6 – Looking North from 15th Street and Baker Avenue**

Similar to Alternative 1, the existing foreground view would remain unchanged, but new development on the Park District site would be visible within the mid-ground and background views. Views under Alternative 2 would be similar to those depicted for Alternative 1 from this viewpoint location except for the southern portion of the site. In this area, under Alternative 2, the high-density residential buildings that are proposed are 10 stories in height as opposed to 15 stories under Alternative 1, which results in slightly less intensive development in this area (see Figure 3.8-7).

**Shadows**

This section of the DEIS analyzes shadow diagrams, contained in Appendix G, that depict shading that would occur with development of Alternative 2 for vernal equinox (approx. March 21st), summer solstice (approx. June 21st), autumnal equinox (approx. Sept. 21st), and winter solstice (approx. December 21st). The figures in Appendix G and accompanying text below focus on and describe possible shadow impacts to off-site public open space areas (Wetland A, the Boy’s and Girl’s Club fields, Hawthorne Elementary School field, and Wiggums Hollow Park), and key on-site open space areas, that could result from full-buildout of this alternative, with consideration of shading that already occurs from existing buildings that would remain. The analysis also considers shading that could occur to residential uses that are present surrounding the site. Under Alternative 2, there would be no large, publicly accessible on-site park and therefore the focus of the analysis is exclusively on off-site open space areas.

The following analysis summarizes shadow impacts for three times of the day on each of the key days of the solar year. These key days of the solar year and times of the day depict worst-case impacts. However, shadow-related impacts can also occur at other times of the day throughout the year. Because of the earth’s rotation, the duration of shadow-related impacts varies for a stationary observer based on season and depending upon the width of the shadow. The shadow graphics that are included in Appendix G have been adjusted to compensate for topography and, in the case of vernal equinox, summer solstice, and autumnal equinox, daylight savings time.

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11 NOAA defines a clear day as one with zero to 3/10 average sky cover, a partly cloudy is one with 4/10 to 7/10 tenths average sky cover and a cloudy day is on

12 Pacific Daylight Savings Time (PDST) applies to shadow impacts associated with spring equinox, summer solstice and autumnal equinox.
Future development and associated landscaping on the site under Alternative 2 would generate shadows over adjacent portions of the Delta neighborhood and surrounding streets. In general, the time of greatest shading would occur during periods when the sun is at a low-angle, including mid- to late afternoon in the winter and late afternoon to early evening in the summer.

**Vernal (Spring) Equinox**

Sunrise on vernal equinox (approx. March 21st) occurs at about 6:11 AM and sunset at 6:21 PM.

The extent of possible shading from the Alternative 2 must also be considered within the context of climatic data for the month (e.g., on average the number of clear, partly cloudy, and cloudy days). Data\(^\text{13}\) indicates that on average March has four clear days, eight partly cloudy days and 19 cloudy days.\(^\text{14}\)

As indicated by the diagrams in Appendix G for the vernal equinox, potential impacts of shadows from development under Alternative 2, together with shadows from other nearby buildings, were evaluated at 9 AM, 12 PM, and 3 PM. Pacific Daylight Savings Time is in effect on this day.

- **At 9 AM**, shadows from development under Alternative 2 would not affect the open space areas west of the site because the maximum building heights would be lower (10 stories as compared to 15 stories under Alternative 1). Some residences to the west of Poplar Street would experience shading, but the number of residences affected would be less than under Alternative 1.

- **At 12 PM**, shadow impacts under Alternative 2 would generally be similar to those described for Alternative 1.

- **At 3 PM**, shadow impacts under Alternative 2 would generally be similar to those described for Alternative 1.

**Summer Solstice**

Sunrise on summer solstice (approx. June 21st) occurs at about 5:11 AM and sunset at 9:10 PM. Pacific Daylight Savings Time remains in effect on this day.

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\(^\text{13}\) NOAA, 2005.

\(^\text{14}\) NOAA defines a clear day as one with zero to 3/10 average sky cover, a partly cloudy is one with 4/10 to 7/10 tenths average sky cover and a cloudy day is one with 8/10 to 10/10 tenths average sky cover.
Climatic data\textsuperscript{15} for the month of June indicates that on average June has seven clear days, eight partly cloudy days, and 15 cloudy days.\textsuperscript{16}

As indicated by the diagrams in Appendix G for summer solstice, potential impacts from shadows from Alternative 2, together with shadows from other nearby buildings, were evaluated at 9 AM, 12 PM, and 3 PM.

- At 9 AM, shadow impacts under Alternative 2 would be similar to Alternative 1, except that fewer residences to the west of Poplar Street would experience shading.

- At 12 PM, shadows impacts under Alternative 2 would generally be similar to Alternative 1.

- At 3 PM, shadows impacts under Alternative 2 would generally be similar to Alternative 1, except that one additional residence to the east of Fir Street would experience shading. This increased shading would occur due to one of the additional buildings that would be constructed (in the center of the site) under Alternative 2.

\textit{Autumnal Equinox}

Sunrise on autumnal equinox (approx. September 21st) occurs at about 6:13 AM and sunset at 8:11 PM. Pacific Daylight Savings Time remains in effect on this day.

Climatic data\textsuperscript{17} for the month of September indicate that on average September has three clear days, six partly cloudy days, and 22 cloudy days.

As indicated by the diagrams contained in Appendix G for autumnal equinox, potential impacts from shadows from buildings that would be built under Alternative 2, together with shadows from other nearby buildings, were evaluated at 9 AM, 12 PM, and 3 PM.

- At 9 AM, shadows under Alternative 2 would not affect the open areas west of the site because the maximum building heights would be lower (10 stories as compared to 15 stories under Alternative 1). Some residences to the west of Poplar Street would experience shading, but the number of residences affected would be less than under Alternative 1.

- At 12 PM, shadow impacts under Alternative 2 would generally be similar to Alternative 1.

\textsuperscript{15} op cit.
\textsuperscript{16} NOAA defines a clear day as one with zero to 3/10 average sky cover, a partly cloudy is one with 4/10 to 7/10 tenths average sky cover and a cloudy day is one with 8/10 to 10/10 tenths average sky cover.
\textsuperscript{17} NOAA, 2005.
• **At 3 PM**, shadow impacts under Alternative 2 would generally be similar to Alternative 1, except additional residences to the east of Fir Street would experience shading. This increased shading would occur due to one of the additional buildings that would be constructed (in the center of the site) under Alternative 2.

*Winter Solstice*

Sunrise on winter solstice (approx. December 21st) occurs at about 7:54 AM and sunset at 4:19 PM. Climatic data\(^{18}\) for the month of December indicate that on average December has three clear days, four partly cloudy days, and 23 cloudy days.\(^{19}\)

As indicated in Appendix G, for winter solstice, potential impacts from shadows from development under Alternative 2, together with shadows from other nearby buildings, were evaluated at 9 AM, 12 PM and 3 PM.

• **At 9 AM**, shadow impacts under Alternative 2 would generally be similar to Alternative 1.

• **At 12 PM**, shadow impacts under Alternative 2 would be less than Alternative 1, as shadows would not extend as far to the north, and fewer residences north of the site would be affected by shading.

• **At 3 PM**, shadow impacts under Alternative 2 would generally be similar to Alternative 1.

*Summary*

As demonstrated by the shadow graphics, new buildings constructed under Alternative 2 are not expected to contribute to significant additional shading of off-site open space areas to the west and northwest (i.e., Wetland A, the Boy’s and Girl’s Club fields and Hawthorne Elementary School fields). A minor amount of shading could occur in the mornings at 9 AM during the vernal and autumnal equinox and extensive shading could occur at 9 AM on the winter solstice. Although the shading on winter solstice would be extensive, given the time of day and time of year that the shading would occur, impacts are not considered significant. This is because less use of outdoor areas is expected to occur in the winter when temperatures are generally lower, rainy days are frequent, and there are fewer clear days.

According to the shadow graphics, no shading from the project would affect Wiggums Hollow Park to the north on the times of day/days of the year that were evaluated for this analysis.

\(^{18}\) op cit.

\(^{19}\) NOAA defines a clear day as one with zero to 3/10 average sky cover, a partly cloudy is one with 4/10 to 7/10 tenths average sky cover and a cloudy day is one with 8/10 to 10/10 tenths average sky cover.
In general, shadow impacts to off-site open space areas under Alternative 2 would be similar to or less than those described under Alternative 1 due to the lower maximum building heights that would be built (10 stories versus 15 stories). Similarly, off-site shadow impacts to residences would also be similar to but somewhat less than Alternative 1 due to the shorter building heights that would be developed.

**Light and Glare**

**Construction and Operation**

In general, potential light and glare impacts associated with construction and operation with development of Alternative 2 would be almost identical to those described under Alternative 1 and are not expected to be significant.

**Alternative 3 - No Action**

Under Alternative 3, the No Action Alternative, the site would remain in its existing condition. All the existing buildings and landscaping would remain for the time being, but demolition and removal of the buildings would ultimately occur under a separate action.

For analysis purposes in the EIS, Alternative 3 assumes development under the site’s existing zoning and would include a total of up to approximately 458 housing units and no non-residential uses. A total of approximately 377 surface parking spaces would be provided in surface lots. More of the site would be in open space than under the other EIS alternatives because the parcel west of Poplar Street would be unbuildable due to the required building setbacks. However, no large, publicly accessible park would be provided.

**Shadows**

Off-site shading impacts to open space areas surrounding the site would be less than under Alternatives 1 and 2 because building heights would be limited to four stories, as compared to maximum building heights of 15 stories under Alternative 1 and 10 stories under Alternative 2. As noted previously, greater building heights extend the length cast by shadows. Less impact to off-site residences is likewise expected due to the shorter building heights, although some shading could still occur depending on the time of day and time of year. Overall, significant shading impacts are not anticipated under Alternative 3.

**Light and Glare**

Light and glare impacts during construction of Alternative 3 would be similar to Alternatives 1 and 2, but the duration of such impacts would likely be less because the site would likely be redeveloped more quickly.

Operational light and glare impacts under Alternative 3 would be less than Alternatives 1 and 2 because less development would occur overall, and no retail, civic/service, or office
uses would be provided. Overall, light and glare conditions under Alternative 3 would be slightly greater than existing conditions.

**Cumulative Impacts**

Development of Madrona Square and other recently completed or current projects in vicinity of the Park District site would contribute to cumulative aesthetic changes by creating updated, modernized and/or rehabilitated buildings in the site area. It should also be noted that the City of Everett is currently in the process of updating their Comprehensive Plan. In August 2023, the City Council approved three growth alternatives for analysis as part of the update process, including Alternative 1 – Extend Current Plans, Alternative 2 – Concentrated Growth Pattern, and Alternative 3 – Dispersed Growth Pattern. The City intends to complete the update process in 2024 (see the City of Everett’s website for further details on their Comprehensive Plan Update process). Updates to the Comprehensive Plan could result in the potential for additional development in the vicinity of the Park District site which could result in cumulative aesthetic changes. These projects, together with the Park District, could result in cumulative aesthetic impacts, including related to: visual character, height, bulk, and scale, views, shadows, and light and glare.

**Conclusion**

Proposed development on the Park District site under EIS Alternatives 1 and 2 would change the visual character of the site from the existing former barracks-style, low-density multifamily residential buildings to a mixed-use, medium to high-density development that would be more modern and reflect a more urban/metropolitan environment.

Alternatives 1 and 2 would increase the height, bulk, and scale of buildings on the Park District site relative to existing conditions, and would place taller, more dense development in proximity to the low and medium-density residential development in the surrounding Delta neighborhood. Several features of proposed development are designed to reduce height/bulk/scale impacts on the surrounding area, particularly on adjacent single-family residences (e.g., layout of land uses; open space, setbacks, design standards; and landscaping).

Views of proposed development under Alternatives 1 and 2 would change from public places surrounding the site. The greatest changes in views would occur due to the new development that would include medium and high-density buildings that would be visible primarily in the mid-ground and background views.

New buildings under EIS Alternatives 1 and 2 would cast shadows on parks and open space in the surrounding area and onsite. However, they are not expected to contribute to significant additional shading of off-site or on-site parks/open space areas.
New sources of light and glare would be introduced by Alternatives 1 and 2 (e.g., from building facades, windows, and pavement, and reflections from vehicle traffic). Illumination would be shielded from the night sky and would generate minimal light spillage across property lines. The amount of glare generated would be typical of urban development and is not expected to be significant.

Possible development under Alternative 3 would result in less height/bulk/scale, view, shadow, and light/glare impacts than Alternatives 1 and 2.

### 3.8.3 Mitigation Measures

The following measures have been identified to address the potential transportation impacts from operation of the Park District Project. These measures apply to all the alternatives unless otherwise noted. **Legally-Required Measures** are measures that are required by code, laws or local, state, and federal regulations to address significant impacts. **Measures Proposed as Part of Project** are measures incorporated into the project to reduce impacts. **Other Possible Measures** are additional measures that could be implemented to address impacts but are not necessary to mitigate significant impacts.

**Legally-Required Measures**

- Proposed development would adhere to applicable City of Everett Land Use Code requirements related to aesthetics/light and glare and would be subject to the City’s design review processes. Criteria for approval of the PDO also includes addressing light and glare impacts.

- Pedestrian-scale lighting would be provided consistent with code, function, and safety requirements.

- Signs would comply with City of Everett code-required illumination standards.

**Measures Proposed as Part of Project**

- The proposed Park District Design Standards would provide standards related to landscaping, building setbacks, design features, block frontages, residential common areas, utility equipment screening, and other elements.

- Street trees and the use of building materials with relatively low-reflectivity at street level would minimize reflective glare-related impacts to pedestrians and nearby residents immediately adjacent to the site.

- Exterior lighting would include fixtures to direct the light downward and/or upward and away from on and off-site land uses.
• Exterior lighting would comply with the Park District Design Standards. Illumination would be shielded from the night sky and generate minimal light spillage across property lines.

**Other Possible Mitigation Measures**

• Construction-related lighting could be shielded and directed away from adjacent land uses.

### 3.8.4 Significant Unavoidable Adverse Impacts

Proposed development under Alternatives 1 and 2 would change the visual character of the Park District site to a new large-scale mixed-use development comprised of primarily medium and high-density buildings, as well as open space/park facilities. Some might view these changes in visual character as positive, others as negative. No significant unavoidable adverse aesthetic/light and glare impacts are anticipated with implementation of the identified mitigation measures.
3.9 HISTORIC and CULTURAL RESOURCES

This section of the DEIS describes the historic and cultural resources on and near the Park District site. Potential impacts from development of the EIS alternatives on historic and cultural resources are evaluated and mitigation measures identified. This analysis is based on the Cultural Resources Report prepared by HRA in July 2023. Due to the sensitive nature of the information in this report, it is on-file with the Washington State Department of Archaeology and Historic Preservation (DAHP). More detailed information on the indigenous history and other historic period history of the site and vicinity are contained in the Cultural Resources Report.

Methodology

For the historic and cultural resources analysis, the Park District site is referred to as the area of impacts (AI), which is defined as one parcel out from the area of anticipated ground disturbance (AAGD) on parcel 386200100000 (the Baker Heights neighborhood).

An archival record search was conducted for the project using a research radius of 0.5 mile. The DAHP online database (Washington Information System for Architectural and Archaeological Records [WISAARD]) was reviewed for archaeological site records, cultural resource survey reports, historic register information, and cemetery records. The statewide archaeological predictive model on WISAARD was also reviewed to estimate the probability for encountering archaeological resources within the AI.

HRA’s in-house library was searched for information on the environmental, archaeological, and historical context of the AI and vicinity. Historic-period plats from the U.S. Surveyor General (USSG) General Land Office were reviewed for the presence of structures and features that might have been present within the AI, as well as indicators of potential archaeological sites and past land-use patterns. Other historic-period maps and atlases (i.e., Anderson, Metsker, Thomas Bros., and USGS maps), were also reviewed for historic-period structures, sites, and features, and changes in the vicinity of the AI. In addition, ethnographic sources were reviewed for information regarding place names, burials, and land-use practices (details from the archival record search).

Archaeological pedestrian and subsurface surveys and a built-environment inventory within the AI were conducted for the EIS in May 2023.

Archaeological sites and built-environment resources within the AI that will be at least 50 years of age (constructed in 1985 or earlier) before project completion in 2035 were evaluated. The criteria for listing a property in the National Register of Historic Places (NRHP) require that, in addition to a resource being over 50 years of age and possessing integrity, it must meet at least one of the following criteria, outlined in 36 CFR 60.4:
• Property is associated with events that have made a significant contribution to the broad patterns of our history (Criterion A); or
• Property is associated with the lives of persons significant in our past (Criterion B); or
• Property embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction (Criterion C); or
• Property has yielded, or is likely to yield, information important in prehistory or history (Criterion D).¹

Integrity is the ability of a property to convey its significance through its physical features. It is based on “...why, where and when a property is important.”² In order to retain integrity, a property must retain most of the seven aspects of integrity, which are as follows:

• Location: the place where the property was constructed or the place where the historic event occurred.
• Design: the combination of elements that create the form, plan, space, structure, and style of a property.
• Setting: the physical environment of a historic property.
• Materials: the physical elements that were combined or deposited during a particular period of time, and in a particular pattern or configuration, to form a historic property.
• Workmanship: the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
• Feeling: a property’s expression of the aesthetic or historic sense of a particular period of time.
• Association: the direct link between an important historic event or person and a historic property.³

**Regulatory Context**

No federal funding or permitting is anticipated for the Park District Project; however, the historic/cultural resources evaluation is structured to meet the National Environmental Policy Act (NEPA) regulations in case that changes. Washington State laws addressing the protection of human remains and cultural resources that could pertain to the project include the Indian Graves and Records Act (RCW 27.44) and the Archaeological Sites and Resources Act (RCW 27.53).

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¹ National Park Service (NPS), 1997.
² NPS, 1997.
³ NPS, 1997.


**Historic Context**

A discussion of the current archaeological and ethnographic knowledge of the region in which the AI is located is essential to establishing a context for any archaeological materials that may be identified. The context statement that follows is provided with a significant caveat; this information is based largely on the written record, from publicly available scholarly literature and from ethnographic and archaeological research held in the DAHP database. A thorough and thoughtful understanding of the region’s cultural context should consider the voices of the Indigenous peoples living here today who have ancestral ties to the area. Such information would highlight use of the area and its resources in the past, as well as the continued use by Indigenous peoples in the present day and into the future.

The following historic context information is an abbreviated version of that contained in the Cultural Resources Report.

**Indigenous History**

The earliest recorded archaeological sites in western Washington date to the late Pleistocene through the Holocene. The AI is in the traditional territory of the Snohomish peoples. The Snohomish are part of the Southern Coast Salish cultural group, which comprises two language groupings, Twana and Lushootseed (further subdivided into Northern and Southern). The Snohomish are part of the Northern Lushootseed language group, although the Snohomish dialect is seen as distinct from other Coast Salish languages. Snohomish peoples followed the general Southern Coast Salish subsistence and settlement pattern.

Snohomish territory extended on the mainland from the area just to the north of Edmonds to what is now the northern boundary of the Tulalip Reservation. It also included the southern half of Camano Island and Whidbey Island.

Snohomish task groups set out to seasonal camps to hunt, fish, and gather plants. The principal diet of the Snohomish was seafood such as salmon and shellfish, although terrestrial game animals like deer, elk, and bear were also used (Haeberlin and Gunther, 1930:20; Suttles and Lane, 1990:489). Roots, berries (strawberry, salmonberry, raspberry, huckleberry, and others), cattails, sprouts, and bulbs were also important to the Snohomish.

The first traders from the Hudson’s Bay Company reached Snohomish Territory in 1824. The Snohomish peoples traded at Fort Nisqually throughout the 1830s and interacted with Roman Catholic missionaries in the early 1840s. After the Treaty of Point Elliott was signed by nine Snohomish headmen in 1855, a reservation was established at Tulalip. The

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4 Tweddell, 1974:515
5 Curtis, 1913:174
6 Gibbs, 1877:194; Gunther, 1945; Lane, 1975:24; Suttles and Lane, 1990:489.
reservation was intended for Snohomish, Skykomish, Snoqualmie, and Stillaguamish groups. A boarding school on the Tulalip Reservation was created in 1857 and received increased funding over the decades until its closure in 1932. During its operation, Native American school-age children were taken from their families from around northern Puget Sound and suffered the abuses of White overseers until they were turned out as early as the age of 13 or 14. The Tulalip Reservation was designated as for the “Tulalip Confederated Tribe” in 1873 by President Ulysses S. Grant, followed in 1883 by 40-acre allotments for Snohomish tribal members and larger allotments for members of other tribes.7

Due to severe overcrowding and restriction of religious practices, many Snohomish left the reservation before 1900. In 1923, the Snohomish Tribe of Indians incorporated with more than 400 initial members. Despite following the procedures dictated in numerous Acts throughout the decades of the 1920s through today, the U.S. government has not recognized the Snohomish Tribe of Indians as a tribal entity. The Snohomish are still fighting for federal recognition and reservation land of their own.8

The Indian Reorganization Act of 1934 formed the umbrella under which the Tulalip Tribes was organized. The Tulalips formalized a constitution and Bylaws, and subsequently ratified a charter in 1936. In 1975, the Tribes were allowed to assume Bureau of Indian Affairs responsibilities for themselves under the Indian Self-Determination and Education Assistance Act. Today, the Tulalip Tribes has more than 4,900 members and provides services in the form of culturally appropriate health care, education, senior care, and cultural activities.9

**Other Historic-Period Developments**

Washington Territory was formed in 1853, the year the first non-Native people settled in the lands of Snohomish County on Tulalip Bay. When the reservation was established at Tulalip, the land and its earliest sawmill were turned over to the Tribes. The dense forests of the area also attracted loggers, who set up small logging camps throughout the area on lands set aside for homesteaders.10

The first permanent non-Indigenous settler in the existing city of Everett arrived in 1861. Coming from Massachusetts, Dennis Brigham claimed a 160-acre parcel approximately 1.5 mi southwest of the Al (Cameron et al., 2005:66; Interstate Publishing 1909:I-314; U.S. Census, 1870). John Davis purchased the tract on which the Al sits as a cash-entry claim in 1875. Oliver Young can be seen as the land holder on the 1869 GLO map, and he claimed the adjacent parcel in 1872. Both men were listed as farmers in the 1880 federal census (GLO Patent, 1875; U.S. Census, 1880, as cited in Boswell and Heidman, 2015).

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7 Snohomish Tribe, 2023; Tulalip Tribes, 2023.
9 Tulalip Tribes, 2023
10 Oakley, 2005.
While settlement continued in the heavily forested lands between the Sound and the Snohomish River, sawmills sprang up to turn the massive timber harvests into shingles and dressed lumber. The last decades of the nineteenth century were a period of growth. Speculation about the arrival of the railroad occurred, and in 1889, Washington achieved statehood.

By the time it was incorporated in 1893, Everett boasted a large population (5,600 by 1892), electricity, streetcars, telephones, and a healthy industrial economy. The city also welcomed the Northern Pacific Railroad at this time. However, the panic of 1893, which plunged the county into depression, hit the nascent city of Everett hard. Businesses closed, investment evaporated, and new residents abandoned the young city. Hewitt was replaced as president of the land company, and eastern investors pulled back their support.

Economic recovery began in 1899 upon the transfer of Everett Land Company holdings to James J. Hill’s Everett Improvement Company. The economy continued recovery as Everett continued to make improvements to its bay and riversides, attracting industrialists like Frederick Weyerhaeuser, who came to Everett and founded the Weyerhaeuser Timber Company. In 1907, Everett’s timber industry boomed again as lumber was shipped to San Francisco to repair damage from the 1906 earthquake and fire. Everett suffered its own downtown fire in 1909. Though some downtown buildings were destroyed, the city quickly recovered.

Throughout the first decades of the twentieth century, Everett grew into the industrial city once envisioned by Henry Hewitt, Jr. By the 1920s, new federal funding programs were paving the nation’s roadways. However, during the Great Depression, timber demand plummeted. A lack of residential construction resulted in a severe housing shortage in Everett, as was happening in many communities around the country.

The Washington Legislature passed acts to create local housing authorities in 1939, allowing the state to partake in the federal aid process. The EHA was created under the new 1939 state legislation for the city of Everett. The main responsibility of the new EHA was mitigating the shortage of safe and clean housing for low-income people by constructing affordable housing.

The first housing project of the EHA was Baker Heights, initiated in 1942. Baker Heights was a 250-unit development on a 24-acre site, including the AL. To meet their budget to construct slightly more expensive permanent housing, as opposed to temporary housing, landscaping was minimal, and community center construction was put on hold. A grid pattern of streets was lined with one- to three-bedroom units in single-story, masonry block

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12 Oakley, 2005.
13 Boswell and Heideman, 2015:16–17
buildings. The utilitarian design and low-cost materials enabled construction to be completed by January 1944.\textsuperscript{14}

Following World War II (WWII), the EHA limited their housing developments to low-income state residents (of at least one year) who already lived within five miles of a development. New tenants began to move in starting in 1947, and major renovations began in 1949 to bring the homes up to new national standards. For Baker Heights, that meant the EHA added utility rooms, updated utilities, and eliminated coal fueled stoves in favor of electric. Renovations were completed by 1950.\textsuperscript{15}

Landscape features have changed over the decades, and the siding and windows on all of the buildings have been replaced since the 1949 building renovations. At the time of survey, the AI consisted of 47 of the 55 Baker Heights residential units described above. Adjacent to these houses is the Baker Heights Community Center. Designed by Earl W. Morrison and Associates, the community center was constructed between 1949 and 1950 to provide indoor recreational and meeting spaces for the Baker Heights community.\textsuperscript{16}

The arrival of Boeing in the 1960s necessitated even more housing construction within the city (Everett Public Library, 2023). In 1969, the EHA constructed the Baker Heights Apartments adjacent to the Baker Heights Community Center to provide additional multifamily housing in the area. While a handful of the single-family residences within the AI pre-date the Baker Heights community, the vast majority of surrounding residences were constructed after Baker Heights, likely in response to the influx of residents after Boeing arrived. The last major boom of the twentieth century involved the construction of Naval Station Everett, which began in 1987 and was completed in 1994.\textsuperscript{17}

### 3.9.1 Affected Environment

#### Previous Cultural Resource Studies

One previous cultural resource study has been conducted within the AI, and six additional cultural resources studies have been conducted within 0.5 mile of the AI since 1995. The study within the AI was the Section 106 review and National Register of Historic Places (NRHP)-eligibility recommendation conducted for the previous phase of the project, which included a reconnaissance-level survey of the Baker Heights neighborhood and community center. The neighborhood and community center were determined not eligible for listing in the NRHP in 2015.\textsuperscript{18}

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\textsuperscript{14} Boswell and Heideman, 2015:8–12.
\textsuperscript{15} Boswell and Heideman, 2015:16–17
\textsuperscript{17} Oakley, 2005.
\textsuperscript{18} DAHP, 2023a.
Archaeological Resources

One archaeological site and one archaeological isolate were identified within the AI during the archaeological survey conducted for the EIS.

Archaeological Site HRA-3580-1

One archaeological site, assigned the temporary site number HRA-3580-1, was identified during the subsurface survey. The site consists of a diffuse, mixed historic-period and modern/temporally nondiagnostic subsurface debris scatter measuring approximately 70 meters long (north–south) and 8 meters wide (east–west). Its boundary was drawn to encompass the Shovel Probes (SPs) in which temporally diagnostic historic-period artifacts were identified, including approximately half of a green, hard plastic Washington Sales Tax token, which was produced during a brief period from 1943–1946; a 1939 wheat penny; a Weiser-brand metal Red Dale Camper RV door key (ca. 1958–1979), and a partial beer can pull tab (ca. 1970s). Temporally nondiagnostic artifacts identified during shovel probing within the site included a brass hose nozzle; one colorless bottle glass shard with an embossed “...T”; one colorless plastic metric ruler fragment; one coiled metal clothespin piece; two white hard plastic fragments and one green plastic fragment; one gray plastic gutter edging fragment; one light blue hard plastic toy base fragment; eight wire nails; one metal frame corner piece; three colorless bottle glass shards, one aqua glass Coke bottle shard, and one opaque white glass shard; and one brick fragment. All artifacts were recovered from A horizon sediments at depths of up to 25-cm below surface. Given its diffuse, sparse nature and location between two rows of residential units, Site HRA-3580-1 likely formed from 1943 (the year in which construction of the Baker Heights neighborhood was completed) until at least the 1970s through inadvertent debris accumulation by individuals living in the surrounding homes.

On the basis of the NRHP criteria outlined above, the archaeological site HRA-3580-1 is recommended not eligible for listing in the NRHP. DAHP has not yet concurred with this recommendation.

Given the site’s location between residential units in the historically important Baker Heights neighborhood and its resulting association with both this public housing project and its residents, Site HRA-3580-1 possesses a demonstrable association with events that have made a significant contribution to the history of mid-twentieth century settlement in the Everett area (Criterion A). During their evaluation of the Baker Heights neighborhood, Boswell and Heideman note that “Baker Heights is important as the first permanent public housing project completed by the Everett Housing Authority and represents the large-scale residential developments constructed during the World War II-era to address the critical housing needs of defense workers, military personnel, and low-income families.”19 However, they determined that extensive alterations to the residential units had led to a

loss of integrity for the complex, and therefore recommended that Baker Heights was not eligible for listing in the NRHP.\textsuperscript{20} As a diffuse debris scatter, Site HRA-3580-1 lacks integrity under Criterion A.

None of the temporally diagnostic historic-period artifacts that comprise the site possess a clear, demonstrable association with the lives of specific, significant local persons (Criterion B). As a diffuse debris scatter, the site does not represent the work of a master, possess high artistic value, or represent a significant and distinguishable entity whose components may lack individual distinction (Criterion C). The site formed over a period of decades from 1943 until at least the 1970s through inadvertent debris accumulation between two parallel rows of residential units and is unlikely to answer important research questions or yield information about human history that can only be answered by the actual physical material, design, construction methods, or interrelation of these resources (Criterion D).

Site HRA-3580-1 evidently retains its integrity of location, setting, and materials from its period of formation circa 1943–present, as the artifacts comprising the site have likely remained \textit{in situ} after their initial disposal/deposition by the occupants of the surrounding residential units. As the site comprises a diffuse historic-period and modern debris scatter, it cannot be said to have integrity of design, workmanship, or feeling, nor does it possess an association between an important historic event or person and a historic property. Although Site HRA-3580-1 retains certain aspects of its integrity and may meet Criterion A due to its association with the historically important public housing project in which it was identified, the Baker Heights complex itself was previously recommended not eligible for listing in the NRHP due to a loss of integrity. Therefore, the site does not meet NRHP criteria and is recommended as not eligible for listing in the NRHP.

\textbf{Archaeological Isolate HRA-3580-2}

One historic-period U.S. penny minted in 1925 was identified within A horizon sediments at a depth of approximately 5–15 cmbs. No other cultural materials were identified within the SP in which the 1925 penny was identified, and no radial SPs could be excavated due to the presence of marked, buried utilities to the west and east and residential units to the north and south. U.S. coinage remains in circulation for an average of approximately 30 years,\textsuperscript{21} so it is likely that the 1925 penny was inadvertently discarded at some point during the first several decades of the Baker Heights neighborhood’s history. Given its lack of proximity to any other archaeological deposits, the penny was designated archaeological isolate HRA-3580-2. As an archaeological isolate, HRA-3580-2 is not eligible for listing in the NRHP.

\textsuperscript{20} Ibid.
\textsuperscript{21} U.S. Mint, 2023.
Cemeteries

No cemeteries have been documented within the AI. The closest cemetery is the View Crest Abbey (Site 45SN495), also known as the Mausoleum, approximately 0.65 miles from the site. The Mausoleum was founded in 1940 by prominent local families and currently houses the remains of approximately 4,500 people.\(^{22}\)

Built-Environment Resources

There are no properties listed in the NRHP or the WHR within the AI. A total of 26 historic-period built-environment resources were identified within the AI. Three properties within the AI were previously determined not eligible for listing in the NRHP (Table 3.9-1), and twenty-three properties were surveyed and inventoried for this DEIS (see Table 3.9-2).

Table 3.9-1
PREVIOUSLYRecorded HISTORIC-PERIOD BUILDINGS, STRUCTURES, AND OBJECTS AT LEAST 45 YEARS OLD WITHIN THE AI

<table>
<thead>
<tr>
<th>Property ID</th>
<th>Parcel No.</th>
<th>Year Built</th>
<th>Name/Address</th>
<th>Register Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>674531</td>
<td>00386200600001</td>
<td>1969</td>
<td>Bakerview Apartments, 2605 15th Street</td>
<td>Determined Not Eligible, 2014</td>
</tr>
<tr>
<td>115903/680031</td>
<td>00386200600001</td>
<td>ca. 1969</td>
<td>Baker Heights Community Center, 1499 Baker Avenue</td>
<td>HUD Determined Not Eligible, 2015</td>
</tr>
<tr>
<td>680032, 680033, 680034, 680035, 680036</td>
<td>00386200100000</td>
<td>Variable?</td>
<td>Baker Heights Neighborhood, 2710 14th Street</td>
<td>HUD Determined Not Eligible, 2015</td>
</tr>
</tbody>
</table>


The Bakerview Apartments (Property ID 674531) were recorded in 2014 for the EHA Bakerview Apartments project. According to the surveyor, the building was constructed in 1967. The surveyor did not name an architect and did not provide a statement of significance. However, the resource was determined not eligible for listing in the NRHP.\(^{23}\) No federal agency was named in association with the determination.

The Baker Heights Community Center (Property ID 115903) has been recorded in WISAARD twice. In 2011, the U.S. Department of Housing and Urban Development (HUD) determined the Baker Heights Community Center not eligible for listing due to a lack of integrity.\(^{24}\) In 2015, the Baker Heights Community Center was recorded again on a separate historic property inventory (HPI) form (Property ID 680031) as part of the Demolition or Disposition

\(^{22}\) Muhlstein, 2019.
\(^{23}\) DAHP, 2023a.
\(^{24}\) DAHP, 2023b.
of Baker Heights Neighborhood project. The surveyor noted that while the Baker Heights housing development, including the Baker Heights Community Center, is significant as the first public housing project completed by the EHA, the buildings within the complex have been substantially altered. Therefore, HUD determined the Baker Heights Community Center not eligible for listing in the NRHP due to a lack of integrity. DAHP concurred with the determination on November 16, 2015.25

The Baker Heights neighborhood was also documented as part of the Demolition or Disposition of Baker Heights Neighborhood project in 2015. The housing development was recorded in a series of five separate Historic Property Inventories (HPIs) representative of the five building types within the development: one-bedroom fourplex (Property ID 680032), one-bedroom sixplex (Property ID 680033), two-bedroom fourplex (Property ID 680034), two-bedroom sixplex (Property ID 680035), and three-bedroom fourplex (Property ID 680036). Each of the HPIs indicated substantial alterations to most or all of the buildings in the Baker Heights neighborhood. As noted above, the surveyor acknowledged that while the Baker Heights housing development is significant as the first public housing project completed by EHA, the buildings within the complex had lost integrity. Therefore, HUD determined the Baker Heights neighborhood not eligible for listing in the NRHP. DAHP concurred with the determination on November 16, 2015.26

The twenty-three surveyed resources within the AI that were surveyed and inventoried for this EIS can be split into three categories: multifamily dwellings, single-family dwellings, and public or religious buildings. Of the seven multifamily dwellings, one dates from the WWII era (1417 Pine Street) and shares a similar context with the Baker Heights neighborhood. Due to a remodel ca. 2012, the WWII-era multifamily dwelling does not retain sufficient integrity to convey any potential significance within this context. The remaining six multifamily dwellings were constructed between the 1960s and 1980s, and do not share the same WWII-era context. Additionally, each of these resources do not retain sufficient integrity to convey any potential significance within a late twentieth century housing context. These six multifamily dwellings are recommended not eligible for listing in the NRHP under any criteria due to a lack of significance and integrity.

Of the surveyed built-environment resources, fourteen are single-family dwellings. The six resources along Donovan Lane were constructed as part of a cohesive neighborhood (Donovan District; Property ID 35795). In 2006, these six resources were relocated to their current location from Rockefeller Avenue and Oakes Avenue in order to spare them from demolition. Due to the relocation and subsequent renovations, these six single-family dwellings on Donovan Lane no longer retain sufficient integrity to convey their significance as part of the Donovan District. The remaining eight surveyed single-family dwellings were constructed between the 1920s and the 1980s. Three of these were constructed before WWII and were not associated with significant early neighborhoods in Everett. As such,

25 DAHP, 2023c.
26 DAHP, 2023d.
these three resources are recommended not eligible for listing in the NRHP under any criteria due to a lack of significance. The remaining five single-family dwellings within the AI were constructed after WWII and are recommended not eligible for listing in the NRHP under any criteria due to a lack of significance or integrity.

Two of the surveyed built-environment resources within the AI fall in the public or religious buildings category. Hawthorne Elementary School is associated with the same historic context as the Baker Heights neighborhood, as the school was constructed to support the growing population. However, due to two large additions, which doubled the size of the building, the school no longer retains sufficient integrity to convey any potential significance. The Bailey Chapel does not meet any of the NRHP criteria for listing. Additionally, the building does not meet Criterion Consideration A for religious properties, which states the resource must have significance either architecturally or on “historic grounds to avoid any appearance of judgment by government about the validity of any religion or belief.” \(^{27}\) Therefore, the Bailey Chapel is recommended not eligible for listing in the NRHP under any criteria due to a lack of significance.

All twenty-three surveyed historic-period built-environment resources within the AI are recommended as not eligible for listing in the NRHP.

### Table 3.9-2
PREVIOUSLY UNRECORDED BUILDINGS, STRUCTURES, AND OBJECTS AT LEAST 45 YEARS OLD WITHIN THE AI

<table>
<thead>
<tr>
<th>Parcel No.</th>
<th>Year Built</th>
<th>Address</th>
<th>Name/Description</th>
<th>HRA’s NRHP Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>29051700103500; 29051700103200</td>
<td>1970</td>
<td>2701–2741 12th Street</td>
<td>Wiggums Apartments: EHA Apartment Complex</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>29051700102800</td>
<td>1952</td>
<td>1110 Poplar Street</td>
<td>Hawthorne Elementary School: Nursery, Primary &amp; Secondary School</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>00960009200x00</td>
<td>1949; 1963; 1966-1968</td>
<td>1131 Pine Street</td>
<td>Mobile Home Park</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>438723100100</td>
<td>1967</td>
<td>2908 12th Street</td>
<td>Bailey Chapel: Church</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>438725801100</td>
<td>1969</td>
<td>1327 Pine Street</td>
<td>Townhouse Apartments</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>438725801300</td>
<td>1969</td>
<td>1329 Pine Street</td>
<td>Fourplex: Multifamily Residence</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>438725801500</td>
<td>1969</td>
<td>1331 Pine Street</td>
<td>Fourplex: Multifamily Residence</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>438728000100</td>
<td>1921</td>
<td>1401 Pine Street</td>
<td>Single-Family Residence</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>00438728000300</td>
<td>1985</td>
<td>1405 Pine Street</td>
<td>Single-Family Residence</td>
<td>Not Eligible</td>
</tr>
</tbody>
</table>

\(^{27}\) NPS, 1997:26.
### 3.9.2 Impacts of the Alternatives

Impacts of the alternatives on historic and cultural resources are considered significant if they result in substantial adverse changes to, alteration, or loss of a resource that impacts its eligibility for inclusion in the NRHP and the WHR. Resources that are not eligible for these registers would not be adversely impacted by the EIS alternatives.

**Alternative 1 – Proposed Action**

Development under Alternative 1 would provide a total of up to 1,500 housing units and 70,600 GSF of retail, civic/service, and office uses, and 1,018 structured parking spaces. Approximately 78% of the area of anticipated ground disturbance (AAGD) would be covered in built areas, and 22% of the AAGD would be natural/landscape areas. Approximately 129,300 CY of cut are anticipated as part of Alternative 1.

The historic-period archaeological site HRA-3580-1 is recommended not eligible for listing in the NRHP; however, DAHP has not yet concurred with this recommendation. Should DAHP concur with the recommendation, the site would be determined not eligible for listing in the NRHP. Despite the high potential for its removal under Alternative 1, Site HRA-3580-1 would, therefore, not be adversely impacted by construction activities associated with Alternative 1. As an archaeological isolate, cultural resource HRA-3580-2 is not eligible for listing in the NRHP.

The Baker Heights neighborhood (2710-14th Street) was previously determined not eligible for listing in the NRHP. The main potential impact to built environment resources within the Ai would be a visual effect based on the multi-story development. However, the Bakerview

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<table>
<thead>
<tr>
<th>Parcel No.</th>
<th>Year Built</th>
<th>Address</th>
<th>Name/Description</th>
<th>HRA’s NRHP Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>4387280000500</td>
<td>1954</td>
<td>1409 Pine Street</td>
<td>Single-Family Residence</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>4387280000700</td>
<td>1954</td>
<td>1413 Pine Street</td>
<td>Single-Family Residence</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>4387280000201</td>
<td>1940</td>
<td>1417 Pine Street</td>
<td>Duplex: Multifamily Residence</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>4387280000202</td>
<td>1979</td>
<td>1421 Pine Street</td>
<td>Duplex: Multifamily Residence</td>
<td>Not Eligible</td>
</tr>
<tr>
<td>4387280000200</td>
<td>1921</td>
<td>1431 Pine Street</td>
<td>Single-Family Residence</td>
<td>Not Eligible</td>
</tr>
<tr>
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<td>29051700401000</td>
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<td>1502 Pine Street</td>
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<td>1053500001100</td>
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<td>1925</td>
<td>1205 Donovan Lane</td>
<td>Single-Family Residence</td>
<td>Not Eligible</td>
</tr>
</tbody>
</table>

*Source: HRA, 2023.*
Apartments (Property ID 674531) in the southwestern corner of the AI is also a multi-story building, at seven stories tall. The new development under Alternative 1 would consist of 15 buildings, with four buildings up to fifteen stories in height, which is twice the height as the Bakerview Apartments. As all of the built-environment resources within the AI are recommended not eligible for listing in the NRHP, this visual impact would not affect these resources. As such, these resources would likewise not be adversely impacted by the proposed action.

**Alternative 2 – Design Alternative**

Development under Alternative 2 would provide the same amount of residential, retail, civic/service, and office uses as Alternative 1; however, Alternative 2 includes two more buildings than Alternative 1 resulting in a slightly larger percentage of the AAGD (79%) being covered in built areas; slightly more grading and additional cut required for subsurface parking compared to Alternative 1.

For the same reasons outlined under Alternative 1 above, the cultural resources within the AI would not be adversely impacted under Alternative 2. The historic-period archaeological site HRA-3580-1 is recommended not eligible for listing in the NRHP; however, DAHP has not yet concurred with this recommendation. Should DAHP concur with the recommendation, the site would be determined not eligible for listing in the NRHP. Despite the high potential for its removal during construction activities associated with development of Alternative 2, Site HRA-3580-1 would, therefore, not be adversely impacted. As an archaeological isolate, cultural resource HRA-3580-2 is not eligible for listing in the NRHP.

The Baker Heights neighborhood (2710 14th Street) was previously determined not eligible for listing in the NRHP. The main potential impact to built environment resources within the AI would be a visual effect based on the multi-story development. Alternative 2 would include 17 buildings with a maximum height of ten stories within the development. While this is still relatively tall for the AI and surrounding area, it would be less impactful than Alternative 1. However, as all of the built-environment resources within the AI are recommended not eligible for listing in the NRHP, this visual impact would not affect these resources.

**Alternative 3 – No Action Alternative**

Under Alternative 3, the No Action Alternative, the site would remain in its existing condition. All the existing buildings and landscaping would remain for the time being, but demolition and removal of the buildings would ultimately occur under a separate action. For analysis purposes in the EIS, Alternative 3 assumes development under the site’s existing zoning and would include a total of up to approximately 458 housing units and no non-residential uses. Parking would be provided in surface lots.
Approximately 69% of the AAGD would be covered in built areas and 31% would be natural/landscaped areas. The amount of grading associated with Alternative 3 is expected to be significantly less than for Alternatives 1 and 2 because no under-building parking would be included in Alternative 3.

For the same reasons outlined under Alternatives 1 and 2 above, documented cultural resources within the AI would not be adversely impacted under Alternative 3. The historic-period archaeological site HRA-3580-1 is recommended not eligible for listing in the NRHP; however, DAHP has not yet concurred with this recommendation. Should DAHP concur with the recommendation, the site would be determined not eligible for listing in the NRHP. Despite the potential for its removal during the proposed action, Site HRA-3580-1 would, therefore, not be adversely impacted by Alternative 3. As an archaeological isolate, cultural resource HRA-3580-2 is not eligible for listing in the NRHP.

The Baker Heights neighborhood (2710 14th Street) was previously determined not eligible for listing in the NRHP. Under Alternative 3, development within the AI would still occur; however, the maximum building height is restricted to four stories tall. As this remains shorter than the tallest building within the AI, Bakerview Apartments, Alternative 3 would not have a visual impact on the resources within the AI and surrounding area. Additionally, all of the built-environment resources within the AI are recommended not eligible for listing in the NRHP. Therefore, Alternative 3 would not have any effect on the resources within the AI.

**Cumulative Impacts**

None of the archaeological resources or historic-period built environment resources identified and inventoried within the AI are listed in, previously determined eligible for listing in, or recommended eligible for listing in the NRHP or the WHR. As such, no adverse cumulative impacts to cultural or historic resources are anticipated.

Other local construction projects in the vicinity could occur at the same time as construction of the Park District project. These projects could result in impacts to cultural and historic resources, depending on their location. Similar to the Park District, should these projects have the potential to impact cultural or historic resources, they would be required to provide mitigation. As a result, no significant cultural or historic impacts are anticipated from adjacent projects, in combination with the Park District.

**Conclusion**

*A cultural resources inventory of the AI was conducted that included an archaeological survey within the AAGD and a built-environment inventory. The terrain within the AAGD has been heavily modified during the initial grading, residential unit construction, and*
landscaping associated with the development of the Baker Heights neighborhood, as well as extensive subsequent architectural renovation and landscaping activities.

One archaeological site and one archaeological isolate were identified; assigned the temporary site/isolate numbers HRA-3580-1 and HRA-3580-2, respectively. Site HRA-3580-1 consists of a diffuse, mixed historic-period and modern/temporally nondiagnostic subsurface debris scatter and is recommended not eligible for listing in the NRHP. Isolate HRA-3580-2 is a U.S. penny minted in 1925.

A total of twenty-six historic-period built-environment resources were identified within the AI. Of these, three resources were previously determined not eligible and twenty-three were previously unevaluated resources. All of the newly recorded built-environment resources are recommended not eligible for listing in the NRHP either due to a lack of significance or a lack of integrity. Therefore, there are no historic properties within the AI.

No further cultural resources study is considered necessary unless the project design changes substantially.

### 3.9.3 Mitigation Measures

The following measures have been identified to address the potential transportation impacts from operation of the Park District Project. These measures apply to all the alternatives unless otherwise noted. **Legally-Required Measures** are measures that are required by code, laws or local, state, and federal regulations to address significant impacts. **Measures Proposed as Part of Project** are measures incorporated into the project to reduce impacts. **Other Possible Measures** are additional measures that could be implemented to address impacts but are not necessary to mitigate significant impacts.

**Legally-Required Measures**

- In the event that archaeological deposits are inadvertently discovered during construction or operations in any portion of the AI, ground-disturbing activities would be halted immediately. The EHA project manager would then be notified. EHA would then contact DAHP and the affected Tribes, as appropriate.
- Any human remains that are discovered during construction or maintenance of the Project would be treated with dignity and respect. If ground-disturbing activities encounter human skeletal remains during the course of construction, then all activity that may cause further disturbance to those remains would cease, and the area of the find would be secured and protected from further disturbance. In addition, the finding of human skeletal remains would be reported to the Snohomish County coroner and local law enforcement in the most expeditious manner possible. The remains would not be touched, moved, or further disturbed.
The Snohomish County coroner would assume jurisdiction over the human skeletal remains and determine whether those remains are forensic or non-forensic. If the Snohomish County coroner determines the remains are non-forensic, they would report that finding to DAHP. DAHP would then take jurisdiction over those remains and report them to the appropriate cemeteries and affected Tribes. The State Physical Anthropologist would determine whether the remains are Native American or non-Native American, and report that finding to any appropriate cemeteries and the affected Tribes. DAHP would then handle all consultation with the affected parties as to the future preservation, excavation, and disposition of the remains.

### 3.9.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts on cultural or historic resources are expected with implementation of the mitigation measures listed above.
3.10 TRANSPORTATION

This section of the DEIS describes the transportation conditions on and near the Park District site. Potential impacts from development of the EIS alternatives on transportation conditions are evaluated and mitigation measures identified. This analysis is based on the Transportation Report prepared by Heffron Transportation in October 2023 (see Appendix H).

Methodology

The transportation analysis was performed in accordance with the City of Everett’s Traffic Impact Analysis guidelines in Everett Municipal Code (EMC) §19.51, and the scope and key analysis parameters were coordinated with the City’s Associate Traffic Engineer through many meetings.

Analysis Scope and Study Area

A preliminary evaluation was performed during early site planning to inform the transportation analysis scope of work and study area. The project team met with City staff, and agreed that the study would assess the following elements:

- Planned changes to the roadway system, including street vacations, road improvements, traffic control changes, pedestrian system improvements, bike lanes, and transit amenities;
- Traffic operations at local intersections and new site driveways;
- Traffic safety;
- Transit impact, including potential increase in ridership;
- Parking, including estimating the project’s parking demand and supply need; and
- Freight and loading needs, including site deliveries and waste removal.

The transportation study area evaluates 12 intersections, which are listed in Table 3.10-1. Each intersection has an identification number that is used in tables and figures throughout this report to improve clarity.

______________________________

1 Meeting on 9/21/2022 attended by Michael Brick, Jennifer Gregerson, and Corey Hert from the City of Everett, with Marni Heffron and Michelle Brown from Heffron Transportation, and Mark Davies of MIG.
### Table 3.10-1
**STUDY AREA INTERSECTIONS**

<table>
<thead>
<tr>
<th>ID</th>
<th>Near-Site Intersection</th>
<th>ID</th>
<th>Off-Site Intersection</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>12&lt;sup&gt;th&lt;/sup&gt; Street / Poplar Street</td>
<td>5</td>
<td>12&lt;sup&gt;th&lt;/sup&gt; Street / Broadway</td>
</tr>
<tr>
<td>2</td>
<td>12&lt;sup&gt;th&lt;/sup&gt; Street / Fir Street</td>
<td>6</td>
<td>12&lt;sup&gt;th&lt;/sup&gt; Street / E Marine View Drive</td>
</tr>
<tr>
<td>3</td>
<td>15&lt;sup&gt;th&lt;/sup&gt; Street / Baker Avenue</td>
<td>7</td>
<td>15&lt;sup&gt;th&lt;/sup&gt; Street / Broadway</td>
</tr>
<tr>
<td>4</td>
<td>15&lt;sup&gt;th&lt;/sup&gt; Street / Pine Street</td>
<td>8</td>
<td>16&lt;sup&gt;th&lt;/sup&gt; Street / Broadway</td>
</tr>
<tr>
<td></td>
<td></td>
<td>9</td>
<td>16&lt;sup&gt;th&lt;/sup&gt; Street / Baker Avenue</td>
</tr>
<tr>
<td></td>
<td></td>
<td>10</td>
<td>16&lt;sup&gt;th&lt;/sup&gt; Street / Walnut Street</td>
</tr>
<tr>
<td>11</td>
<td>16&lt;sup&gt;th&lt;/sup&gt; Street / E Marine View Drive</td>
<td>12</td>
<td>Summit Avenue / E Marine View Drive</td>
</tr>
</tbody>
</table>

*Source: Heffron Transportation, 2023.*

1. Evaluated for AM and PM peak hour conditions
2. Evaluated for PM peak hour conditions
3. Signalized intersection

The City of Everett typically requires analysis of only the PM peak hour conditions. However, for the four near-site intersections listed above, the AM peak hour conditions were also evaluated since this is the time period when outbound trips from the site would be highest, which could affect the recommended street configuration or traffic control considerations for the intersections closest to the site. New traffic counts were performed for all the study area intersections in January 2023.

The transportation analysis evaluates the project’s transportation impacts by comparing future conditions with the EIS alternatives to future conditions without the EIS alternatives, which is defined herein as a “No Build Condition.” This No Build Condition assumes that the site would remain in its current vacant state, but that traffic in the area would grow due to other projects and growth in Everett and the region. The No Build Condition also accounts for planned infrastructure and transit improvements that would occur regardless of the project. Because the Park District project could be a multi-phased development occurring over many years, year 2035 was selected as the future horizon year. This is consistent with the horizon year evaluated in the City of Everett’s Comprehensive Plan (2015-2035).<sup>2</sup> Although buildout could be delayed by unfavorable market or economic conditions, this long-term horizon year provides a reasonable basis for determining how the project could change future conditions.

The analysis findings were used to inform physical elements that have been incorporated into the Proposed Action, including the street network, traffic control measures, and parking supply. In addition, this study estimates the project’s potential Transportation Impact Fee, which would be paid with each building permit. Finally, measures that Everett Housing Authority (EHA) should implement to reduce trips and parking are recommended as part of Transportation Demand Management (TDM) and Parking Management Plans.

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<sup>2</sup> City of Everett, updated July 2019.
3.10.1 Affected Environment

This section summarizes the existing transportation system including roadway conditions, traffic volumes, traffic operations, traffic safety, transit, non-motorized facilities, and parking. It also describes future conditions that are likely to occur without any of the EIS alternatives, which includes growth in traffic, planned infrastructure, and transit improvements. As described previously, the future horizon year for all analysis is 2035. Detailed information is presented in Appendix H.

Roadway Network
The study area is bounded by Broadway on the west and E Marine View Drive on the east, both of which are classified as Major Arterials. There are two Collector Arterials north and south of the site, 12th Street and 16th Street, respectively. Other streets in the site vicinity including those internal to the Park District site are classified as Local Streets.

Traffic Volumes
Traffic counts were performed at all study area intersections in January 2023. The compiled traffic counts indicate a system AM peak hour beginning at 7:45 AM and a system PM peak hour beginning at 4:15 PM.

Future traffic volume forecasts for 2035 conditions without any of the EIS alternatives were estimated using a 1.0% compound annual growth rate applied to the existing traffic volumes as recommended by City staff. These are defined as “2035 No Build Conditions,” which assumes that the Park District site remains vacant. These volumes differ from Alternative 3 – No Action Alternative described later, which assumes some residential development could be built on the site subject to existing zoning and development restrictions. Figure 3.10-1 and Figure 3.10-2 show the existing and 2035 No Build traffic volumes for the AM and PM peak hours, respectively.

Traffic Operations
Traffic operations analyses were performed for the study-area intersections. Traffic operations were evaluated using levels of service (LOS) with six letter designations, “A” through “F.” LOS A represents the best traffic operations with little or no delay to motorists. LOS F indicates poor traffic operations with long delays. The City’s Comprehensive Plan has established LOS D as its target operating level for corridors within the City. As such, single intersections could justifiably operate below LOS D if other intersections along the corridor are operating above LOS D.

3 E-mail from Michael Brick, City of Everett, December 8, 2022.
Existing (2023) and 2035 No Build Traffic Volume—AM Peak Hour

Figure 3.10-2

Existing (2023) and 2035 No Build Traffic Volume—PM Peak Hour
Levels of service for the study area intersections were determined using the methodology in the *Highway Capacity Manual 6th Edition (HCM 6).* All level of service calculations were performed using the *Synchro 11.1* traffic operations analysis software. The existing and future No Build Conditions are based on current lane configuration and intersection control. Cycle lengths, splits, and offsets were optimized for future conditions. The analysis determined that all intersections currently operate at LOS D or better and would continue to in the future without any development on the Park District site.

**Traffic Safety**

Collision data for the study area intersections and roadway segments were obtained from the City of Everett for the period between January 1, 2018, and December 31, 2022 (five years). The data showed that the highest number of collisions occurred at three signalized intersections—16th Street / Broadway, 12th Street / Broadway, and 16th Street / E Marine View Drive—where the most prevalent types of collisions were angle collisions and rear-end collisions. The intersection at 16th Street / Broadway had the highest number of collisions, at an average of 10 per year, about one-third of which were angle collisions that are often the most severe type of collisions. This intersection has “permissive” left-turn phasing in all directions (meaning that left turning vehicles must yield to oncoming traffic), which may contribute to the high collision rate. There were five pedestrian or bicycle collisions in the study area in the past five years, three of which occurred at the 12th Street / Broadway intersection. All other intersections had fewer than five per year, which does not indicate traffic safety concerns. There were no fatalities at any of the study area intersections during the five-year analysis period.

**Transit**

Everett Transit, Community Transit, and Skagit Transit currently provide transit service in the site vicinity. The site is directly served by Everett Transit’s Route 29. This route operates seven days per week with headways of 30 to 45 minutes, connecting Everett Community College (EvCC), the Everett Mall Transit Center, and the South Everett Freeway Station Park & Ride. Existing stops for Route 29 are located on Poplar Street with “far-side stops” in each direction at 12th Avenue (southbound stop located south of 12th Street and northbound stop located north of 12th Street). There are also stops for this route south of the site near or on 15th Street. Within 0.25 mile of the site, there are stops serviced by Everett Transit Routes 4 and 7 that also connect College Station, Mall Station, and the Everett Station Park & Ride. Community Transit provides service at Broadway and 14th Avenue with Routes 201 and 202 connecting Lynnwood and Smokey Point at approximately 30-minute headways. Finally, Skagit Transit operates Route 90X providing limited, peak hour connections between Everett and Mt. Vernon with two stops on Broadway, one at 15th Street and the other at EvCC.

The City’s Comprehensive Plan identifies segments of Broadway, E Marine View Drive, Walnut Street, Poplar Street, and 12th Street in the site vicinity as a part of the City’s Tier 1

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Priority Transit Network. Within this priority network, long-range planning efforts would include high-level amenities at transit stops, transit speed improvement projects, improved pedestrian access and markings, and elements to meet increased frequency targets for weekday peak times as well as off-peak and weekend times. Future regional transit projects with potential to impact the study area include Sound Transit’s Everett Link Light Rail extension (projected to begin service 2037-2041), and Community Transit’s planned Swift Gold Line, which would be a new Bus Rapid Transit (BRT) line connecting between Smokey Point and the Everett Station through downtown Marysville and Everett Community College. The Swift Gold Line is planned with 10-minute headways with stops on Broadway. Planning is just commencing with the target for service launch in 2027. Finally, Everett Transit is considering increasing service frequency on the existing Route 29 to connect residential neighborhoods with high-capacity light rail at Everett Station.

**Non-Motorized Transportation**
Most of the roadways in the study area have sidewalks on both sides. The signalized study intersections provide pedestrian-actuated crossings and crosswalks.

There are continuous sidewalks on both sides of 12th Street between Broadway and E Marine View Drive, including curb ramps at each intersection. There are limited sidewalks on the north side of 15th Street. These exist in the half block just east of Broadway, and adjacent to EHA’s Baker Heights project between Baker Avenue and Larch Street. EHA’s Madrona Square project (now under construction) would extend that sidewalk east to about Pine Street. There are no sidewalks on the south side of 15th Street. 15th Street provides the most direct pedestrian route between the southern portion of the site and public transit stops located on Broadway at 14th Street. As noted in the *Transit* section, the transit stops located at this location are expected to serve an increased number of routes and more frequent headways as BRT and light rail service launches in Everett, and local routes support these rapid regional options. The City’s Comprehensive Plan identifies both Broadway and Marine View Drive as part of its Pedestrian Priority Network.

There are sidewalks on both sides of Poplar Street between 12th Street and 14th Street, but only on the east side of the street where Poplar Street turns and becomes Baker Avenue. The all-way-stop-controlled intersection at 12th Street / Poplar Street, which is adjacent to Hawthorne Elementary School, has crosswalks on all four legs of the intersection. Bicycle amenities in the site vicinity include a north-south, signed bike boulevard along Baker Avenue and Poplar Street south of the site. There is an existing wide sidewalk/path for pedestrians and bicyclists all along the east side of E Marine View Drive in the site vicinity. The City’s Comprehensive Plan proposes a bike lane along 12th Street between Broadway and E Marine View Drive. Bike lanes have been created in the segment west of Hawthorne Elementary School; however, the curb lane adjacent to the school is used for

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5 Community Transit, Swift Gold Line Presentation to Puget Sound Regional Council, No Date, [https://www.psrc.org/media/6093](https://www.psrc.org/media/6093), Accessed March 2023.
school loading, and is signed “School Loading Only 8AM to 4 PM, Mon-Fri.” There are currently no bike facilities on 12th Street east of Poplar Street.

**Parking**

On-street parking is allowed on one or both sides of most roadways in the study area. Parking is currently prohibited on the east side of Poplar Street. There are no parking time-restrictions in the site vicinity.

The City of Everett has a Residential Parking Zone (RPZ) program that restricts parking on streets in designated areas to residents with a permit. These were originally established to protect areas from overspill parking generated by institutions such as Everett Community College or Providence Hospital. In 2019, the City of Everett adopted new RPZ zone boundaries, and allows the City Traffic Engineer to then establish RPZ programs when and if requested by local residents. The Park District site is within RPZ B, which includes the area bounded by Broadway, N Broadway, E Marine View Drive, and 19th Street. As of March 2023, no streets in this zone have RPZ restrictions.

### 3.10.2 Impacts of the Alternatives

**Alternatives 1 and 2**

The transportation analysis is based on the number of residential units and size of the commercial and civic/service uses, which are the same for both Alternative 1 (Proposed Action) and Alternative 2 (Design Alternative). Both alternatives would have 1,500 multifamily residential housing units, about 40,200 leasable square feet (sf) of commercial use, a 16,900-sf daycare, and a 6,500-sf library/community use.

The 43 vacant residential buildings on the site would be demolished for either Alternative 1 or 2 (under a separate permit action), and the existing grid of streets that served the former Baker Heights Public Housing development would be reconfigured through street vacations and right-of-way (ROW) or easement dedications to create a new system of public streets. Between 12th Street and 14th Street, Larch Street would be eliminated, Fir Street would be realigned to the east, and Hemlock Street would be relocated to about midway between Poplar Street and Fir Street. A “New Street” would be created to link Poplar and Hemlock Streets. All streets would be rebuilt to current City of Everett standards, which would require EHA to dedicate additional right-of-way along many of the streets.

This sub-section describes the transportation conditions that would exist in the future with Alternatives 1 and 2. It describes changes that the project would make to the street network, estimates the project’s trip generation for all modes of travel, evaluates how the project’s trips would affect area traffic operations, and assesses impacts to transit, non-motorized facilities, and parking.
Roadway Network Changes

Alternatives 1 and 2 would reconfigure and rebuild the existing street grid on the Park District site. Between 12th Street and 14th Street, the existing Larch Street, Hemlock Street and Fir Street rights-of-way would be vacated. A new right-of-way would be dedicated for Fir Street further east on the site, and for Hemlock Street (located about midway between Poplar Street and Fir Street). A “New Street” would be created connecting Poplar and Hemlock Streets midway between 12th and 14th Streets. The project would also dedicate right-of-way along its street frontages to bring those up to City of Everett standards. Poplar Street currently has a 50-foot right-of-way width, and the project would dedicate right-of-way to increase this to between 72 and 91 feet depending on the segment. Likewise, Fir Street and 14th Street are both now 40 feet wide, and the project would dedicate right-of-way to increase those to between 50 and 59 feet. Finally, the new Hemlock Street, which would serve as a north-south central spine in the commercial area, would have a right-of-way width of 64 feet.

Alternatives 1 and 2 also propose to disconnect the Park District grid from 14th Street, which connects to the local neighborhood east of site. The project would use bollards and landscape treatments to prevent cut-through vehicles on 14th Street while allowing pedestrians and bicycles to pass through.

Under Alternatives 1 and 2, all the streets on the Park District site would be improved to include wider sidewalks and landscape areas. Bike lanes would be added to 12th Street and Poplar Street adjacent to the site. On-street parking would also be provided on one or both sides of all internal streets, except New Street.

Trip Generation

Detailed trip generation estimates were prepared for the Proposed Action, the methodology and assumptions are detailed in Appendix H. The methodology determined vehicle trips, which were used to assess traffic operation impacts, and also estimated transit and non-motorized (walk or bike) trips. Vehicles trips are summarized in Table 3.10-2. It shows that the Alternatives 1 and 2 would generate an estimated 7,550 vehicle trips per day, with 744 trips during the AM peak hour, and 679 trips during the PM peak hour. Alternatives 1 and 2 are estimated to generate about 1,100 non-motorized trips per day and 820 transit trips per day. For both modes, about 10% of those trips would occur in the peak hours.
Table 3.10-2.
VEHICLE TRIPS - ALTERNATIVES 1 AND 2

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Size</th>
<th>Daily Trips</th>
<th>AM Peak Hour</th>
<th>PM Peak Hour</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>In</td>
<td>Out</td>
</tr>
<tr>
<td>Multifamily Housing</td>
<td>1,500 units</td>
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</tr>
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<td>Retail</td>
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<td>5</td>
</tr>
<tr>
<td>Restaurant</td>
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<td>740</td>
<td>41</td>
<td>39</td>
</tr>
<tr>
<td>Daycare</td>
<td>16,900 sf</td>
<td>420</td>
<td>53</td>
<td>39</td>
</tr>
<tr>
<td>Library</td>
<td>6,500 sf</td>
<td>240</td>
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</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>7,550</strong></td>
<td><strong>255</strong></td>
<td><strong>489</strong></td>
<td><strong>744</strong></td>
</tr>
</tbody>
</table>


Trip Distribution and Assignment

Trip distribution patterns for the Alternative 1 and 2’s residential trips were derived using the U.S. Census Bureau’s OnTheMap tool, and Google Maps' predictive travel-route and travel-time mapping resource. Trip distribution patterns for the more local-oriented commercial and civic trips were based on the density of residential neighborhoods in the vicinity. The trip distribution patterns are shown on Figure 3.10-3.

Trips were assigned to the Park District road system based on the planned location of parking in each of the site’s four quadrants. About 70% of the parking for commercial and civic uses would be located in the site’s northwest quadrant, with 30% in the northeast quadrant. Residential parking would be more concentrated in the south half of the site with about two-thirds of the parking split between the southwest and southeast quadrants. The remaining residential parking would be in the two north quadrants.

Although trips that access the site along 12th Street could be split to three streets—Poplar, Hemlock and Fir Streets—for the purpose of this analysis, the site-generated trips were concentrated at Poplar and Fir to assess a worst-case condition for those intersections, one of which is an all-way stop (Poplar) and the other is a two-way stop. The analysis was used to determine if changes to traffic control or lane configuration should be considered. Trip assignments are shown on Figure 3.10-4 and Figure 3.10-5, for the AM and PM peak hours, respectively. The Alternative 1 and 2 trips were added to the 2035 No Build Condition traffic volumes. Those volumes are shown in Appendix H.

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Figure 3.10-3

Trip Distribution Patterns - Alternative 1 and 2

Project Trip Assignment for Alternatives 1 and 2—AM Peak Hour

Figure 3.10-4

Figure 3.10-5
Project Trip Assignment for Alternatives and 2 — PM Peak Hour

Traffic Operations
Intersection levels of service for 2035 with Alternatives 1 and 2 were determined using the same methodology described previously for the background conditions. Alternatives 1 and 2 are expected to degrade vehicle operations for the stop-sign controlled eastbound and westbound approaches at 15th Street / Broadway from LOS D to F and LOS D to E, respectively, during the PM peak hour. The City of Everett’s level of service standards relate to corridor operations. Although the side-street movements would operate below the desired LOS D, they would not affect operations along the Broadway corridor. The long delays for the side-street movements may encourage vehicles to divert to the preferred arterial routes. For example, if it is difficult to turn left or cross Broadway at 15th Street, then motorists may instead use the traffic signal at 16th Street and Broadway to make those movements, which is the preferred location. Because it is desirable that motorists use arterial streets, no improvements are recommended for the poor operations on the non-arterial street to discourage its use.

All other study intersections and site access driveways are expected to continue to operate at acceptable levels, and no mitigation would be required.

Site Access, Circulation, and Loading
The traffic operations analysis determined that all of the near-site intersections would operate at acceptable levels of service under Alternatives 1 and 2, and no changes to the lane configurations or traffic control would be needed. Internal intersections are also expected to operate at very good levels of service, providing flexibility for the type of traffic control. Hemlock Street is planned to be a central spine for both vehicular and pedestrian activity. As such, it is recommended that the intersection at Hemlock Street / “New Street” in the center of the site be controlled with an all-way stop with pedestrian crosswalks on all legs of the intersection. It is also recommended that EHA work with the City to implement measures that enhance pedestrian crossings of Poplar Street at New Street and/or 14th Street, which would have increased traffic to reach transit stops and the path on the east side of the Poplar Street. Traffic calming features such as landscape bulb-outs would be provided on the internal streets. All garage driveways should be designed to maintain sight triangles between drivers and pedestrians on the sidewalks.

Alternatives 1 and 2 both propose to disconnect the Park District grid from 14th Street, which connects to the local neighborhood east of site. The project would use bollards and landscape treatments to prevent cut-through vehicles on 14th Street while allowing pedestrians and bicycles to pass through. While this change may increase travel distance for those who live on 14th Street and are driving to areas west of the site (such as to Broadway), it would prevent Park District vehicles from using that local street to reach E Marine View Drive.
Waste and other service functions are planned to be located off-street; however, some on-street loading is also anticipated. Passenger load zones should be designated along the internal streets, with a large load zone (3 to 4 vehicles) located near the planned daycare (Fir Street) and medium-size load zones (2 to 3 vehicles) located on Hemlock Street and Poplar Street north of 14th Street near the civic and commercial uses. Small load zones (1 vehicle) should be located near residential lobbies. Load zones should provide for both passengers and freight, including services such as food delivery. Load zones should be signed for “15-minute load/unload only,” which allows for passenger loading as well as delivery and service functions.

**Traffic Safety**

The collision analysis determined that the arterial intersections along Broadway and Marine View Drive were the locations with the highest number of collisions. Few collisions occurred in the immediate vicinity of the site. While the increases in traffic generated by Alternatives 1 and 2 could result in a proportional increase in traffic collisions, the project is not expected to create any additional safety concerns at those locations. The project would reconstruct the grid of streets on and adjacent to the Park District site and provide amenities for pedestrians and bicyclists. These are expected to improve safety compared to the existing conditions.

**Transit**

Alternatives 1 and 2 are estimated to generate 820 transit trips per day (410 boardings and 410 alightings), with about 80 transit trips during the peak hour at full buildout. These trips would be served by several routes within one-half mile of the site. The closest service—Route 29—has three buses per direction during the peak hour. If 50% of the site’s transit riders were to use that route, with most (75%) taking it in the peak direction (to or from downtown and the Everett station), this would average to about 10 riders per bus.

Street improvements proposed under Alternatives 1 and 2 along Poplar Street would allow Everett Transit to move its northbound bus stop from the far side (north of) 12th Street to a location adjacent to the project near “New Street” where it would be close to planned commercial and civic uses. This location could be improved with shelters or amenities integrated into the adjacent buildings. Everett Housing Authority would continue to work with Everett Transit related to the optimal stop location.

**Non-Motorized Transportation Facilities**

Alternatives 1 and 2 would substantially improve the pedestrian and bicycle network on the site and adjacent streets. New sidewalks with landscaping would be provided on all internal and frontage streets in the Park District. New bike lanes would be created on Poplar Street and 12th Street adjacent to the site. The project would also construct a new multi-use path on the west side of Poplar Street between 14th Street and 12th Street, which would create a new safe-route-to-school for Hawthorne Elementary School northwest of the site.
**Parking Demand and Supply**

Detailed parking demand and supply analysis was performed to support conceptual design and the Planned Development Ordinance (see Appendix H for the full analysis). The analysis showed that the City’s current parking code (EMC §19.34) would require more parking than national and regional studies of similar projects suggest would be needed. Three changes to the existing EMC parking code were recommended to achieve a parking supply value that would be “right sized” to the parking demand estimate for this project.

1. **Base Parking Rate** – Set the base parking rate for residential uses to **0.70 parking stalls per bedroom**. The parking analysis determined that a per-bedroom parking rate is a more accurate measure of parking need than a per-unit parking rate. This base parking rate assumes that residents would be charged for on-site parking. It is noted that compared to the current EMC per-unit rates, the per-bedroom rate would result in a lower parking rate for studio and one-bedroom units but a higher rate for units with two or more bedrooms.

2. **Transit Reduction** – EMC §19.34.025 allows a 25% reduction in parking if the site is located within one-quarter mile of Frequent Transit Service (defined as three or more bus trips per hour per direction between 6:00 AM and 7:00 PM during the work week). However, it is recommended that the reduction be allowed for sites within one-half mile of Frequent Transit Service based on regional and national data that supports this reduction.

3. **Reductions for Transit and Affordable Units** – Allow the base residential rate to be reduced by 25% to account for the proximity to frequent transit service AND allow the parking rate for the affordable units to be reduced by 50%.

One existing code provision was also applied to the Park District. This includes:

- **Shared Parking** – Parking for the commercial and civic uses was reduced by 50% as allowed by EMC §19.34.070.D.3 since these uses can share residential parking at some times.

With the code adjustments and application of other code provisions, the parking supply required for Alternatives 1 and 2 would be **1,018 stalls** (924 stalls for the residential uses plus 94 stalls for the commercial / civic uses).

Per EMC §19.34.080, EHA would be required to prepare a Transportation Demand Management (TDM) Plan in order to reduce parking supply and associated demand. In addition, some parking management strategies would be implemented to optimize use of on-site parking and prevent parking spillover to the neighborhood streets.
**Construction Transportation Impacts**

Alternative 1 and 2 would be constructed over approximately 12 years. Demolition and removal of all the buildings onsite could begin in 2024 under a separate action. There would be at least four major development phases that generally consist of the site’s four main quadrants. The elements of each construction phase, including transportation elements, are described in Chapter 2.

The most noticeable construction-related traffic impacts are likely to occur during demolition of existing buildings and major earthwork stages. The remaining 43 buildings on the site would be demolished and removed under a separate action. Subsequent clearing and grading would occur with each quadrant phase described above. A total of approximately 129,300 Cubic Yards (CY) of cut and 30,300 CY of fill (a net export of 99,000 CY) are estimated for the entire site development under Alternative 1; grading would be greater under Alternative 2 due to excavation for two additional buildings. Phase 4 would have the largest net export of excavated material with about 42,300 CY of material that would need to be trucked from the site. Assuming an average of 20-cubic yards per truck (truck/trailer combination), that phase of earthwork transport could generate about 2,115 truckloads. With two loaders, it is estimated that the site could generate six truckloads per hour, which would generate 12 truck trips per hour (six empty trucks arrive at the site and six loaded trucks leave the site). At that pace, and working 8 hours per day, Phase 4 could generate an estimated 96 truck trips per day, and the excavation traffic could last eight to ten weeks. The level of traffic is much lower than the project would generate at full build-out, and no impacts to local traffic operations are anticipated. Truck trips are expected to be lower during other stages of construction, which could include deliveries, such as concrete, lumber, roofing, windows, mechanical equipment, and other building materials.

Another potential construction-related transportation impact would be construction-worker parking and staging. During early phases of the project, temporary parking could be provided on vacant building sites. During later phases, the contractor may need to secure off-site parking for workers.

Finally, construction activity could affect the function of area streets, particularly on Poplar Street since the project would change the street’s alignment and elevation. This could affect existing transit service and pedestrian use of this street, including as a walking route to Hawthorne Elementary School. Construction of Poplar Street is anticipated to occur in Phase 2 when parallel streets (e.g., Pine, Hemlock and Fir Street) could be used as alternative routes for transit. It may be possible to create a temporary pedestrian path west of Poplar Street during construction.

Prior to commencing construction on each phase of development, Everett Housing Authority and/or its prime contractor(s) would prepare a *Construction Transportation Management Plan*. This plan would include information related to street closures that could affect transit or pedestrian routes and describe alternative routes and bus stop locations for those modes. Measures needed to maintain safe routes to school (e.g., crosswalks) and
Accessibility (e.g., curb ramps) should be included in the plan. In addition, the contractor would identify construction haul routes that limit use of non-arterial streets. Finally, the contractor would identify the location and quantity of construction worker parking.

**Alternative 3 - No Action Alternative**

For analysis purposes in the EIS, Alternative 3, No Action, assumes the maximum development program that could be constructed under the existing zoning code, and assumes neither a Planned Development Overlay (PDO) nor Comprehensive Plan text amendment would be required. The program accounts for having to widen existing streets to meet current City of Everett street standards, which reduces the area available for new buildings. With these limitations, it is estimated that up to 458 multifamily residential units could be built under Alternative 3. These would require 377 parking stalls per current parking code requirements. Streets would remain in the same locations as the existing network but would be improved and widened to City standards.

**Street Network**

Alternative 3 assumes that the existing internal network of streets would remain but would be improved to meet City of Everett design standards, which would likely require widening to standard ROW widths and constructing sidewalks and landscape treatments along those streets. No additional trails or pedestrian amenities would be provided.

**Trip Generation, Distribution and Assignment**

Design analysis determined that 458 multi-family units under Alternative 3 could be constructed under existing zoning while accounting for updated street widening and setbacks. No other land uses could be built. Alternative 3 is estimated to generate about 2,600 vehicle trips per day with about 140 trips during the AM peak hour and 195 trips during the PM peak hour.

The residential distribution pattern described for Alternatives 1 and 2 was used to assign the Alternative 3 trips. Alternative 3 project volumes are shown in Appendix H.

**Traffic Operations**

Intersection levels of service for 2035 with Alternative 3 were determined using the same methodology described previously for the background conditions. Similar to Alternatives 1 and 2, Alternative 3 is expected to degrade operations of the side-street movements at the 15th Street / Broadway intersection to LOS E or F. As previously described, no mitigation is recommended for these movements in order to dissuade motorists from using these non-arterial routes. All other intersections would operate at LOS D or better with Alternative 3.

**Site Access, Circulation and Loading**

Alternative 3 would likely retain the current grid of streets, and it is assumed that each street would need to be upgraded to meet City of Everett standards, including increasing...
the curb-to-curb dimension and adding landscape and sidewalk features. These Row enhancements were considered in determining the buildable land available.

One primary difference is that Alternative 3 would likely locate parking on each building site, including individual unit driveways and parking garages. Therefore, there would be many more driveway crossings of the site's sidewalks than proposed with Alternatives 1 and 2. Likewise, freight deliveries and services such as waste pick-up would also occur at each site rather than being consolidated as under Alternatives 1 and 2.

**Transit and Non-Motorized Facilities**
Alternative 3 is also assumed to improve internal streets to City standards with sidewalk and bike lanes where required, but no additional pedestrian or transit amenities would likely occur. Alternative 3 is expected to generate about 300 transit trips per day with about 20 during the peak hour.

**Parking Supply and Demand**
Parking for Alternative 3 would meet current code requirements, which for the Alternative 3 program is estimated to be 377 parking stalls. No reductions would likely be pursued for shared parking (since there would be no commercial uses). Reductions for low-income housing or senior housing could be pursued if some of the units are designated for those housing types. As noted above, parking would likely be located with individual units or buildings, and not consolidated as with Alternatives 1 and 2.

**Conclusion**

*Alternatives 1 and 2 would reconfigure and rebuild the existing street grid on the Park District site. All of the streets on the site would be improved to include wider sidewalks and landscape areas. Bike lanes would be added to 12th Street and Poplar Street adjacent to the site.*

*Alternatives 1 and 2 would generate an estimated 7,550 vehicle trips per day, with 744 vehicle trips during the AM peak hour, and 679 vehicle trips during the PM peak hour. The project is estimated to generate about 1,100 non-motorized trips per day and 820 transit trips per day. For both modes, about 10% of those trips would occur in the peak hours. The planned transportation network in the site vicinity would accommodate Alternative 1 and 2’s trip generation. No off-site transportation improvements would be needed.*

**Mitigation**

The following measures have been identified to address the potential utility impacts from construction and operation of the Park District Development Project. These measures apply to all the alternatives unless otherwise noted. *Legally-Required Measures* are measures that are required by code, laws or local, state, and federal regulations to address significant impacts. *Measures Proposed as Part of Project* are measures incorporated into the project
to reduce impacts. Other Possible Measures are additional measures that could be implemented to address impacts but are not necessary to mitigate significant impacts.

**Legally Required Mitigation**

- **Traffic Impact Fee.** The City of Everett collects transportation impact fees for new developments that are estimated to generate ten or more average daily vehicle trips (EMC 37.82.20). Each project developed on the site would be charged the impact fee at the time of building permit, using the fee rate in effect at the time. However, to show the potential magnitude of total fees, the City’s Traffic Mitigation Fee for year 2023 was applied, which is $4,993 per net new PM peak hour trip. The Proposed Action is estimated to generate 679 PM peak hour trips, which at the current rate would result in a Traffic Mitigation Fee of about $3.4 million. The City allows credit for off-site infrastructure and other improvements that benefit the general public.

- **Transportation Demand and Marking Management Measures.** Per EMC §19.34.080, EHA would be required to prepare a TDM Plan in order to reduce parking supply and associated demand. Some parking management strategies would be implemented to optimize use of on-site parking and prevent parking spillover to the neighborhood streets. Appendix H lists potential strategies to consider for the TDM Plan.

**Measures Proposed as Part of the Project**

- **Construction Traffic Management Plan.** Prior to commencing construction on each phase of development, the Everett Housing Authority and/or its prime contractor(s) would prepare a Construction Transportation Management Plan. This plan would include information related to street closures that could affect transit or pedestrian routes and describe alternative routes and bus stop locations for those modes. Measures needed to maintain safe routes to school (e.g., crosswalks) and accessibility (e.g., curb ramps) would be included in the plan. In addition, the contractor would identify construction haul routes that limit use of non-arterial streets. Finally, the contractor would identify the location and quantity of construction worker parking.

**Significant Unavoidable Adverse Impacts**

With transportation features built into the project as well as implementation of the mitigation measures listed above, no significant unavoidable transportation impacts are expected.
3.11 PUBLIC SERVICES

This section of the DEIS describes the existing public services (police, fire/emergency services, public schools, and parks) that serve the Park District site and surrounding area. Potential impacts from development of the EIS alternatives on public services are evaluated and mitigation measures identified.

Methodology

Information for the public services section was obtained through research and personal communications with affected agencies, including: the Everett Police Department (letter response received on June 28, 2023), the Everett Fire Department (letter response received on May 11, 2023), and Everett Public Schools (letter response received on May 12, 2023).

Neither the Everett Police Department nor the Everett Fire Department have formally adopted Level of Service (LOS) standards. In the absence of this information, it is generally assumed for purposes of analysis in the DEIS, that staffing needs for the Police Department and Fire Department would increase in direct proportion to population increases under the EIS alternatives. Population-based standards for these services are often adopted by local jurisdictions to guide levels of service, and the use of such standards for estimating and analyzing incremental public service impacts in environmental documents is a common, generally accepted, and reasonable tool. It is noted, however, that this assumption is likely conservative (i.e., overestimates need to some extent) because it does not account for some efficiencies or economies of scale that may be experienced as agencies grow in size. At the same time, it does not address non-residential uses directly; this is discussed further in the analysis.

The Everett School District identifies adopted student generation rates for single-family and multifamily residences in their 2022-27 Capital Facilities Plan. These student generation rates are used in the analysis to determine the potential demand for and impacts on public schools that could occur under the EIS alternatives.

3.11.1 Affected Environment

This sub-section describes the existing public services that serve the Park District site, including police services, fire/emergency services, public schools, and parks/recreation areas.

Police

Police service for the Park District site and surrounding area is provided by the City of Everett Police Department. The Police Department currently operates out of two facilities: the North Precinct (also serves as the Department headquarters) which is located at 3002 Wetmore Avenue and the South Precinct which is located at 1121 SE Everett Mall Way. The Park District
site is located within the Department’s North Sector and is most proximate to the North Precinct.

The Department currently employs approximately 206 sworn officers with approximately 63 patrol vehicles. Officers are assigned to one of four crews that work one of four shifts. The minimum staffing level for the day shift is 12 officers and 13 officers for the night shift. In particular, the North Precinct is staffed by approximately 30 officers, four Sergeants, two Lieutenants and one Captain with approximately 29 vehicles that are assigned to the North Precinct. Minimum staffing levels for the North Precinct are five officers for the day shift and six officers for the night shift (Everett Police Department, 2023).

Calls for service are managed and dispatched by SNO911 which handles all 911 and non-emergency calls for police and fire services in Snohomish County. Calls are received and prioritized by SNO911 on a numerical system as priority 1 through 5, with 1 being the highest priority. There are two dedicated dispatchers at SNO911 for the Everett Police Department and they assign patrol officers to calls based off of priority through radio or their computer aided dispatch system. Over the past five years, calls for service to the Department have decreased from approximately 153,764 calls in 2018 to 140,630 calls in 2022 (approximately nine percent decrease). Table 3.11-1 summarizes calls for service over the past five years.

<table>
<thead>
<tr>
<th>Table 3.11-1</th>
</tr>
</thead>
<tbody>
<tr>
<td>CITY OF EVERETT POLICE DEPARTMENT CALLS FOR SERVICE: 2018-2022</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Calls for Police Service</td>
</tr>
<tr>
<td>--------------------------</td>
</tr>
<tr>
<td>Source: City of Everett Police Department, 2023.</td>
</tr>
</tbody>
</table>

While the Everett Police Department does not maintain any level of service standards or response time goals or standards, the median response times for calls in 2022 ranges from 4.51 minutes for Priority 1 calls to 18.07 minutes for Priority 5 calls. The Department continually monitors and evaluates staffing and capital needs and anticipates that they would require staffing increases and facility and equipment upgrades/improvements in the next 10-20 years (Everett Police Department, 2023).

Fire / Emergency Services

The Everett Fire Department currently provides fire protection and emergency medical service (EMS) to the site and surrounding areas. The Fire Department also maintains automatic mutual aid agreements with neighboring jurisdictions, including the Marysville Regional Fire Authority, Snohomish Regional Fire Authority, South Snohomish Regional Fire Authority, Mukilteo Fire Department, and Snohomish Fire District. The Everett Fire Department headquarters are located at 2801 Oakes Avenue and the closest fire station to the Park District site is Station #2 which is located at 2201 16th Street.
The Everett Fire Department currently employs approximately 180 firefighters and at least 34 firefighters are on duty at a given time to meet the Department’s minimum staffing requirements. Station #2 is staffed by five firefighters on each of four shifts per day, including a captain, a driver/engineer, and three firefighters/emergency medical technicians (EMTs). Station #2 also houses one fire engine (Engine 2) and one ambulance (Aid 2) to respond to calls. Since 2017, calls for service to the Department have increased by approximately 16 percent. Calls for service are received by and routed through Sno911 (the dispatch center for Snohomish County) and based on the nature of emergency and pre-determined response plans, the dispatch center notifies the appropriate station and units to respond. The majority of the calls responded to by the Department are for emergency medical services. For Station #2, emergency medical service calls accounted for approximately 82 percent of all calls in 2022. Table 3.11-2 summarizes the annual calls to the Department, as well as specific calls for Station #2.

### Table 3.11-2

**EVERETT FIRE DEPARTMENT CALLS FOR SERVICE: 2017-2022**

<table>
<thead>
<tr>
<th></th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
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<tbody>
<tr>
<td>Everett Fire Department Total Calls for Service</td>
<td>23,934</td>
<td>22,955</td>
<td>22,908</td>
<td>21,623</td>
<td>24,508</td>
<td>27,765</td>
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<tr>
<td>Station #2</td>
<td>5,017</td>
<td>4,743</td>
<td>4,792</td>
<td>4,417</td>
<td>5,154</td>
<td>5,882</td>
</tr>
</tbody>
</table>

*Source: Everett Fire Department, 2023.*

The Everett Fire Department does not maintain level of service standards or guidelines. It uses standards from the National Fire Protection Association (NFPA) as goals, including response time. In 2021, the Fire Department’s average response time for fire incidents was 6:15 and 90 percent of the time was 9:12 or less. The average response time for EMS calls was 6:13 and 90 percent of the time was 9:05 or less. Table 3.11-3 summarizes the Everett Fire Department responses times for 2021 and provides a comparison with NFPA standards.

### Table 3.11-3

**2021 EVERETT FIRE DEPARTMENT RESPONSE TIMES AND NFPA STANDARDS**

<table>
<thead>
<tr>
<th></th>
<th>Turnout Time</th>
<th>Travel Time of First Engine</th>
<th>Travel Time of Full Alarm</th>
<th>Fire Department Response Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Everett Fire Department</td>
<td>3:36</td>
<td>7:23</td>
<td>11:10</td>
<td>9:05</td>
</tr>
<tr>
<td>NFPA Standard</td>
<td>1:20</td>
<td>4:00</td>
<td>8:00</td>
<td>5:20</td>
</tr>
</tbody>
</table>

*Source: Everett Fire Department, 2022.*

Note: Consistent with NFPA, the times listed above are those achieved 90 percent of the time.

### Public Schools

The Park District site is located within the enrollment boundaries of the Everett School District and is within the attendance boundaries of Hawthorne Elementary School, North Middle School, and Everett High School. Based on information from the School District’s 2022-27
Capital Facilities Plan, Hawthorne Elementary has a current capacity of 517 students, North Middle School has a capacity of 887 students, and Everett High School has a capacity of 1,973 students.

Student enrollment within the Everett School District has been on a slight decline over the past five years. Table 3.11-3 summarizes the student enrollment within the District since 2018-19, as well as at each school that would serve the Park District site. Overall student enrollment in the District has decreased by approximately two percent over the past five years. Based on the 2022-23 student enrollment levels indicated in Table 3.11-4, each of the schools that would serve the Park District site are below their student capacities.

Table 3.11-4

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Hawthorne ES</td>
<td>517</td>
<td>412</td>
<td>399</td>
<td>398</td>
<td>372</td>
<td>371</td>
</tr>
<tr>
<td>North MS</td>
<td>887</td>
<td>707</td>
<td>747</td>
<td>723</td>
<td>700</td>
<td>707</td>
</tr>
<tr>
<td>Everett HS</td>
<td>1,973</td>
<td>1,394</td>
<td>1,351</td>
<td>1,442</td>
<td>1,566</td>
<td>1,554</td>
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<tr>
<td>Total Everett School District</td>
<td>20,079</td>
<td>20,170</td>
<td>19,539</td>
<td>19,633</td>
<td>19,578</td>
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</table>

Student enrollment projections for the Everett School District indicate that student enrollment is anticipated to increase by approximately eight percent by the 2032-33 school year. Table 3.11-5 summarizes the District’s student enrollment projections overall for the entire school district, as well as for each of the schools that would serve the Park District site. As noted in that table, the enrollment projections for each of the individual schools suggest that projected student enrollment through the 2032-33 school could be accommodated within each of the existing school’s capacity.

Table 3.11-5

<table>
<thead>
<tr>
<th></th>
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<tbody>
<tr>
<td>Hawthorne ES</td>
<td>517</td>
<td>355</td>
<td>355</td>
<td>355</td>
<td>355</td>
<td>358</td>
<td>365</td>
<td>361</td>
<td>357</td>
<td>358</td>
<td>357</td>
</tr>
<tr>
<td>North MS</td>
<td>887</td>
<td>708</td>
<td>742</td>
<td>754</td>
<td>761</td>
<td>772</td>
<td>775</td>
<td>788</td>
<td>788</td>
<td>781</td>
<td>790</td>
</tr>
<tr>
<td>Everett HS</td>
<td>1,973</td>
<td>1,589</td>
<td>1,534</td>
<td>1,575</td>
<td>1,626</td>
<td>1,687</td>
<td>1,774</td>
<td>1,784</td>
<td>1,821</td>
<td>1,837</td>
<td>1,856</td>
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<tr>
<td>Total Everett School District</td>
<td>19,556</td>
<td>19,508</td>
<td>19,737</td>
<td>19,920</td>
<td>20,077</td>
<td>20,308</td>
<td>20,467</td>
<td>20,637</td>
<td>20,842</td>
<td>21,040</td>
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</tbody>
</table>
The Everett School District’s 2022-27 Capital Facilities Plan identifies the current impact fees that would apply to new residential development within the District’s boundaries, including $12,572 per single-family residence, $0 per multifamily residences with zero-one bedroom, $7,668 per multifamily residence with two or more bedrooms, and $7,668 per duplex or townhome residence. The 2022-27 Capital Facilities Plan also identifies planned improvements within the District, including improvements that would directly address potential student capacity issues. While there are no improvements identified as necessary for Hawthorne Elementary School, North Middle School or Everett High School, the 2022-27 Capital Facilities Plan does identify classroom addition improvement projects at Jackson Elementary and Madison Elementary. Other potential capacity issues at elementary schools, middle schools and high schools are identified to be addressed through the provision of new or relocated portable classroom buildings as needed at specific schools.

**Parks and Recreation**

**Existing Parks and Recreation Facilities**

The Park District site is located in the northeast portion of the City of Everett, in the Delta neighborhood. The existing site is occupied by 45 vacant, multifamily residential buildings. These buildings will be demolished and removed under a separate action. Existing playground areas are located on the site, as well as landscaped areas.

Several City of Everett parks and recreation areas are located in the vicinity of the site (within a one-mile radius), including the following:

- **Wiggums Hollow Park** – Located immediately north of the site (beyond 12th Street). The approximately 10-acre park includes playground areas, a skate park, basketball courts, picnic shelter areas, public art, and open space areas.
- **Senator Henry M. Jackson Park** – Located approximately 0.3 mile to the southeast of the site. This 14-acre park contains baseball/softball fields, soccer fields, basketball courts, playground areas, community gardens, picnic shelters, walking/jogging paths, and open space areas.
- **Viola Ousler Viewpoint** – This 0.3-acre park is located approximately 0.4 mile to the northeast of the site and contains seating areas with views across the Snohomish River.
- **Summit Park** – This 3-acre park is located approximately 0.7 mile to the southeast of the site and contains seating areas with views of the Cascade Mountains.
- **Garfield Park** – Located approximately 0.8 mile to the southeast of the site. This approximately 5.6-acre park includes baseball/softball fields, pickleball courts, tennis courts, basketball courts, playground areas, and walking paths.
- **Grand Avenue Park** – This 5-acre park is located approximately 0.9 mile to the southwest of the site and contains walking paths, seating areas, and views of Jetty Island and Puget Sound.
- **American Legion Memorial Park** – Located approximately 1-mile to the northwest of the site. This park includes baseball fields, tennis courts, pickleball courts, basketball...
courts, an arboretum, a golf course, picnic shelters, playground areas, trails/walking paths, and views of Puget Sound and Everett waterfront.

- **Langus Riverfront Park** – This 1-acre park is located approximately 0.7 mile to the east of the site, beyond the Snohomish River, and includes waterfront access, a boat launch, picnic shelters and barbecue facilities, a 3-mile trail/walking paths, a fishing pier, a shell house and rowing dock, and seating areas with views of the Snohomish River.

Pursuant to Everett Municipal Code (EMC) Chapter 19.53, the City maintains a park impact fee program, consistent with their Comprehensive Plan, to ensure that development bears its proportionate share of capital costs for public park facilities and services that are necessitated in whole or in part by development within the City. EMC 19.53.060 identifies the park impact fees for residential and commercial development are assessed at the time of a complete building permit application and are collected at the time the building permit is issued. **Table 3.11-6** presents the current City parks impact fees.

### Table 3.11-6
CITY OF EVERETT PARKS IMPACT FEES

<table>
<thead>
<tr>
<th>Land Use Type</th>
<th>Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Residential, Levied per Unit</strong></td>
<td></td>
</tr>
<tr>
<td>1 Bedroom and Studio</td>
<td>$941</td>
</tr>
<tr>
<td>2 Bedroom</td>
<td>$1,882</td>
</tr>
<tr>
<td>3 Bedrooms or More</td>
<td>$2,823</td>
</tr>
<tr>
<td><strong>Commercial, Levied per Square Foot</strong></td>
<td></td>
</tr>
<tr>
<td>Office and Services</td>
<td>$0.26</td>
</tr>
<tr>
<td>Retail</td>
<td>$0.38</td>
</tr>
<tr>
<td>Industrial</td>
<td>$0.21</td>
</tr>
</tbody>
</table>

*Source: City of Everett, 2023.*

**Everett 2022 Parks, Recreation and Open Space Plan**

In February 2022, the City of Everett adopted their Parks, Recreation and Open Space (PROS) Plan which provides an inventory of the City’s parks, recreation, and open space areas, and identifies level of service (LOS), demand and needs, goals and policies, and a capital plan for parks, recreation, and open space in the City.

Existing parks and recreation areas in the vicinity of the Park District site are identified above. The PROS Plan identifies LOS as the amount and quality of parks, trails, and open space that are necessary to meet current and future needs. The LOS standards are used to guide how facilities or services may need to be expanded as population increases. LOS is typically related to a unit of population (e.g., acres or parks or miles of trails per 1,000 population) and the PROS Plan identifies LOS base rates and target rates as summarized in **Table 3.11-7**
Table 3.11-7
CITY OF EVERETT PROS PLAN LOS SUMMARY

<table>
<thead>
<tr>
<th></th>
<th>Current Inventory</th>
<th>Relevant Population</th>
<th>2020 Population</th>
<th>Base Rate per 1,000</th>
<th>Target Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Parks (acres)</td>
<td>923.9</td>
<td>Residential</td>
<td>112,700</td>
<td>No Net Loss</td>
<td>8.2</td>
</tr>
<tr>
<td>Developed Parks (acres)</td>
<td>190.0</td>
<td>Residential</td>
<td>112,700</td>
<td>1.7</td>
<td></td>
</tr>
<tr>
<td>Neighborhood/Urban Parks (acres)</td>
<td>63.2</td>
<td>Residential Equivalent¹</td>
<td>130,006</td>
<td>0.5</td>
<td></td>
</tr>
<tr>
<td>Path Trails (miles)</td>
<td>15.4</td>
<td>Residential</td>
<td>112,700</td>
<td>0.14</td>
<td></td>
</tr>
<tr>
<td>Multipurpose Trails (miles)</td>
<td>12.2</td>
<td>Residential Equivalent¹</td>
<td>130,006</td>
<td>0.09</td>
<td></td>
</tr>
</tbody>
</table>

Source: City of Everett PROS Plan, 2022.
¹ Residential equivalent adds a share of employment population to residential population since both employees and residents have access to Everett parks and trails.

As noted in Table 3.11-7, the base rate for total parks is no net loss of current total acres of parks in the City of Everett system. An aspirational target level of service for total parks is also provided (8.2 acres per 1,000 population). However, the PROS Plan acknowledges that as a largely built community, it would be difficult to add enough park space to achieve the target rate. LOS policy in the PROS Plan also includes a measure to provide equitable access for all residents to have a 10-minute walk to their nearest park. The base rate for the percentage of population to have a 10-minute walk to a park is 65% with the target rate to increase that percentage up to 80% of the population by 2044 (City of Everett, 2022).

3.11.2 Impacts of the Alternatives

An analysis of the potential public service impacts of the Park District Project is provided below. For the purposes of this analysis, it is anticipated that potential impacts would be the same under Alternatives 1 and 2 since both Alternatives assume the same number residential units, mix of residential development (e.g., low, medium, and high density residential), and non-residential development (e.g., retail, civic/service, and office).

Alternatives 1 and 2

Development of the approximately 16-acre Park District site would include the following land uses under Alternatives 1 and 2:
• **Residential** – up to approximately 1,500 multifamily residential units\(^1\) with approximately 3,645 residents\(^2\);

• **Non-Residential** – up to approximately 70,600 gross sq. ft. (GSF), broken down as follows:
  - **Retail** – 20,200 GSF;
  - **Civic** – 26,400 GSF; and
  - **Office** – 20,000 GSF.

Alternative 1 would feature buildings up to a maximum of 15 stories and Alternative 2 buildings up to a maximum of 12 stories. See **Table 2-2** for summary of land uses under Alternatives 1 and 2.

**Police**

Construction activities associated with new development under Alternatives 1 and 2 would generate new calls for police service during the construction process. These calls would likely primarily relate to construction site theft, vandalism, and construction accidents/injuries.

Once operational, development and associated new residents at the Park District under Alternatives 1 and 2 would generate increased demand for police services, including new calls for services from the site. The increased demand for police services would create an increased need for additional officers to serve the new residents by the full buildout of the site. As noted above under the Affected Environment, the Everett Police Department does not have an adopted level of service standard that can be used to project police department service demand or needs. Therefore, it is generally assumed for purposes of this analysis that project-related demands on the Everett Police Department would occur through increased staffing needs that would increase in direct proportion to population increases under Alternatives 1 and 2.

Based on data from the Washington State Office Financial Management (OFM), the City of Everett has a 2023 population of approximately 114,200 people. As noted under the Affected Environment, the Everett Police Department currently has approximately 206 officers on staff to serve the city’s population. Therefore, the Everett Police Department’s ratio of existing officers to population is one officer per 554 population. Using this ratio, it is anticipated that the development under Alternatives 1 and 2, and the associated population increase of approximately 3,645 residents, would create a demand for approximately 6.6 new officers. New officers would generate an associated need for additional vehicles and other equipment, and potentially new facilities.

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1. Residential units are assumed to be medium- to high-density multifamily apartments. Residential units would include a range of bedroom counts, including studio (293 units), 1-bedroom (879 units), 2-bedrooms (296 units), 3-bedrooms (26 units), and 5-bedrooms (6 units).

2. The estimate of new residents is based on an average household size in City of Everett of 2.43 persons per household from the *U.S. Census Bureau, American Community Survey (ACS), 5-Year Estimates, 2017-2021*. 
Fire / Emergency Services

Construction under Alternatives 1 and 2 would generate new calls for services to the Everett Fire Department. Calls for service are anticipated to relate to fire incidences or workplace injuries during the construction process. Such injuries could require emergency medical services and ambulance transportation.

Development and associated new residents under Alternatives 1 and 2 would generate additional demand for fire protection services. It is assumed that service demand generated by the new on-site population would include a mix of calls related to fire protection, emergency medical services, special operations, and other fire department services. Based on historic call data from the Everett Fire Department, it is anticipated that most of the service calls would be for emergency medical services.

As noted above under Affected Environment, the Everett Fire Department does not have an adopted level of service standard that can be used to project fire department service demand or needs. It is assumed for purposes of this analysis that project-related demands on the Everett Fire Department would occur through increased staffing needs that would increase in direct proportion to population increases under the EIS alternatives.

The Everett Fire Department currently has approximately 180 firefighters on staff to serve the city’s population of 114,200 people. Therefore, the Everett Fire Departments ratio of existing firefighters to population is one firefighter per 635 population. Using this ratio, it is anticipated that the development under Alternatives 1 and 2 and the associated population increase of approximately 3,645 residents³ would create a demand for approximately 5.8 new firefighters. New firefighters would generate an associated need for additional equipment and potentially additional vehicles and facilities.

As development occurs under Alternatives 1 and 2, the Everett Fire Department would continue to review their capacity and capabilities on an annual basis and additional staffing and equipment needs would be evaluated by the Department (Everett Fire Department, 2023).

Public Schools

Construction activities associated with development of the Park District Project under Alternatives 1 and 2 are not anticipated to generate any construction-related impacts to public school services.

Once operational, proposed development and associated new residents under Alternatives 1 and 2 would generate new students and increased demand for public school services from the Everett School District. As noted previously, Everett School District maintains student generation rates for single-family and multifamily residential development as part of their 2022-27 Capital Facilities Plan. However, the District has found recently that their student

³ The estimate of new residents is based on an average household size in City of Everett of 2.43 persons per household from the U.S. Census Bureau, American Community Survey (ACS), 5-Year Estimates, 2017-2021.
generation rates for multifamily residential units with two or more bedrooms have been substantially lower than the actual student enrollment that has occurred once those developments have been constructed. As such, Everett School District provided student generation calculations for the Park District Project that is specific to development assumptions under Alternatives 1 and 2. In total, the Everett School District anticipates that approximately 706 new students would be generated by development under Alternatives 1 or 2 (Everett School District, 2023).

While the specific grade levels of potential new students cannot be determined, it is anticipated that students generated by new development would be dispersed across a range of grade levels over the course of development on the site and would likely attend either Hawthorne Elementary School, North Middle School, or Everett High School. As noted in the Affected Environment discussion, each of the schools are currently below their capacity and are projected to remain below capacity through the 2032-33 school year. Based Everett School District’s enrollment projections, the three schools that serve the Park District site would have remaining capacity of approximately 375 students in the 2032-33 school year and could accommodate a portion of the students generated by development under Alternatives 1 or 2. If necessary, portable classroom buildings could be utilized to provide additional capacity at the schools. As noted above, the development of the Park District Project would require the payment of impact fees during the permitting process in coordination with the Everett School District and any capacity measures for the schools would be identified though the District’s capital facilities planning process.

**Parks and Recreation**

New residents on the site under Alternative 1 are anticipated to generate an increased demand and usage of local parks in the site vicinity. Under Alternative 1, the design for the site is centered around a large, centrally located park that would serve the Park District residents and also be publicly accessible for the surrounding community. The approximately 1.5-acre publicly accessible park would feature a meadow, plaza, recreation areas, pavilion, and other recreation and leisure amenities. In total, approximately 8.5 acres (53%) of the Park District site would be retained in open space, including built open space (e.g., park, plazas, courtyards, pathways/sidewalks) and natural open space (e.g., parks, lawns, and other landscaping) at full buildout. Approximately 76% of the open space would be publicly accessible (e.g., the centrally located park and pathways/sidewalks throughout the site) and 24% in private/semi-private open space for project residents and employees (e.g., building courtyards, entry yards for the townhouses, community garden, and play areas).

Development under Alternative 1 would fulfill the City of Everett PROS Plan base rate LOS standard of no net loss of current total acres of parks in the City of Everett system. And while it would not technically contribute to the PROS Plan target rate LOS (8.2 acres of parks per 1,000 population), it would provide an approximately 1.5-acre publicly accessible park that would

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Note that school impact fees would be calculated at the time of permit submittal and could be subject to change from the current fee structure.
include recreation space and amenities for the City of Everett residents. In total, approximately 6.5 acres of open space on the Park District site would be publicly accessible under Alternative 1. Development of the Park District under Alternative 1 would also contribute to the PROS Plan LOS policy to provide equitable access for all residents to have a 10-minute walk to their nearest park. New residents would be located immediately adjacent to the large park within the development, and close to Wiggums Hollow Park (within a 10-minute walk from the site), which would contribute to increase the percentage of population that would meet the City’s target of 80% of the population being within a 10-minute walk to a public park by 2044. Development under Alternative 1 would also require the payment of park impact fees, consistent with EMC Chapter 19.53, and would be coordinated with the City of Everett. Park impact fees would be calculated at the time of a complete building permit application and would be collected at building permit issuance.\(^5\)

Under Alternative 2, proposed redevelopment of the site would feature the same amounts of new residential units, and retail, civic/service, and office uses as Alternative 1, and it is anticipated that the level of demand for parks and recreation space would be the same as Alternative 1. However, more buildings (two more) would be built onsite than under Alternative 1, resulting in greater site coverage. As such, less of the site would be in open space under Alternative 2 and less of the open space would be consolidated in the central portion of the site. Alternative 2 would include approximately 7.9 acres of open space (compared to 8.5 acres under Alternative 1) and there would be no centrally located, publicly accessible park.

Similar to Alternative 1, development under Alternative 2 would fulfill the PROS Plan base rate LOS standard of no net loss of current total acreage of parks in the City of Everett park system, but Alternative 2 would not provide a publicly accessible park within the central portion of the site. As under Alternative 1, development of Alternative 2 would also contribute to the LOS goal for equitable access to parks by increasing the percentage of the population that is located within a 10-minute walk to a public park. Similar to Alternative 1, development under Alternative 2 would also require the payment of park impact fees, consistent with EMC Chapter 19.53.

**Indirect and Cumulative Impacts**

Proposed development with Alternatives 1 and 2 could result in some indirect impacts to police and fire departments that provide assistance through mutual aid agreements. Additional indirect student generation in the Everett School District could also occur from growth in population associated with new employment at proposed office, retail, and civic/service uses under Alternatives 1 and 2.

Cumulative impacts to public services would result from planned and approved development and associated population that could occur in the City of Everett within the same planning horizon as Alternatives 1 and 2. It should be noted that the City of Everett is currently in the

\(^5\) Note that pursuant to EMC 18.53.070, park impact fees are updated annually and could be subject to change from the current fee structure.
process of updating their Comprehensive Plan. In August 2023, the City Council approved three growth alternatives for analysis as part of the update process, including Alternative 1 – Extend Current Plans, Alternative 2 – Concentrated Growth Pattern, and Alternative 3 – Dispersed Growth Pattern. The City intends to complete the update process in 2024 (see the City of Everett’s website for further details on their Comprehensive Plan Update process). Updates to the Comprehensive Plan could result in the potential for additional development in the vicinity of the Park District site which could result in cumulative increases in demand for public services. Increased demand, however, would not necessarily be an adverse impact if it is adequately planned for and addressed.

**Alternative 3 - No Action**

Under Alternative 3, the No Action Alternative, the site would remain in its existing condition. All the existing buildings and landscaping would remain for the time being, but demolition and removal of the buildings will ultimately occur under a separate action. Assumed redevelopment of the site under existing zoning would feature residential uses, no non-residential uses would be included. Approximately 458 housing units in up to four-story buildings would be provided which would accommodate approximately 1,113 residents⁶. Open space, but no large, publicly accessible park would be provided.

**Police**

Construction activities under the No Action Alternative could generate new calls for police service, such as calls for construction site theft, vandalism, and construction accidents/injuries. It is anticipated that the number of calls would be lower than under Alternatives 1 and 2 due to the less development on the site.

Development and associated new residents under the No Action Alternative would generate increased demand for police services, which would create an increased need for additional officers to serve the new residents of the site. Based on the methodology used in this section, it is anticipated that the approximately 1,113 new residents would generate the need for approximately two new officers (compared with 6.6 new officers under Alternatives 1 and 2. These new officers could require a new vehicle, but likely would not generate the need for additional facilities.

**Fire and Emergency Services**

Construction under the No Action Alternative could also generate new calls for fire and emergency services, including fire incidences or workplace injuries during the construction process. It is anticipated that the number of calls during construction would be lower than Alternatives 1 and 2 due to less development on the site.

⁶ Ibid 1.
Development and associated new residents under the No Action Alternative would generate additional demand for fire protection services through increased service calls which would result in an associated increased need for new staffing by the Fire Department. Based on the methodology used in this section, it is anticipated that the approximately 1,113 new residents under the No Action Alternative would generate the need for approximately 1.8 new firefighters (compared with 5.8 new firefighters under Alternatives 1 and 2). The additional firefighters likely would not generate the need for additional equipment, vehicles, or facilities.

**Public Schools**
New residential development under the No Action Alternative and the associated approximately 1,113 new residents on the site are anticipated to result in new students that would attend schools in the Everett School District. Based on the assumption of 458 low density multifamily units (e.g., townhouses or flats) under the No Action Alternative, it is anticipated that residential development would generate approximately 554 students (compared to approximately 706 students under Alternatives 1 or 2). Development of residential uses under the No Action Alternative would also require the payment of school impact fees.

**Parks and Recreation**
Under Alternative 3, proposed redevelopment of the site would feature residential uses; no non-residential uses would be included. Fewer new housing units would be provided than under Alternatives 1 and 2 and as a result it is anticipated that demand for parks and recreation areas would be less due to fewer residents on the site. In addition, more of the site would be in open space than under the other alternatives because the parcel west of Poplar Street would be unbuildable due to the required building setbacks. However, no large, publicly accessible park would be provided. Development of residential uses under the No Action Alternative would also require the payment of park impact fees.

Similar to Alternatives 1 and 2, development under Alternative 3 would fulfill the PROS Plan base rate LOS standard of no net loss of current total acreage of parks in the City of Everett park system; however, a publicly accessible park would not be provided on the site. Alternative 3 would also contribute to the LOS goal for equitable access to parks by increasing the percentage of the population that is located within a 10-minute walk to a public park, but at a lower level than Alternatives 1 and 2 due to fewer residents on the site.

**Conclusion**

*Development under Alternatives 1 and 2 would generate additional demand for public services during construction and operation of the project. Additional demand for services would result in increased staffing needs by the Everett Police Department and Everett Fire Department. New residential development under Alternatives 1 and 2 would generate additional demand for parks and recreation facilities and generate new students that would attend schools in the Everett School District. Alternative 3 would result in less development, shorter buildout periods, fewer residents, and a reduced demand for public services.*
3.11.3 Mitigation Measures

The following measures have been identified to address the potential public service impacts from construction and operation of the Park District Development Project. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state, and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce impacts. Other Possible Measures are additional measures that could be implemented to address impacts but are not necessary to mitigate significant impacts.

Legally-Required Measures

- A portion of the tax revenues generated from development of the site (including construction sales tax, retail sales tax, business and occupation tax, property tax, utilities tax, and other fees, licenses and permits) would accrue to the City of Everett and would help to offset the increased demands for public services (e.g., police and fire services).

- As development occurs on the site, the project would pay school impact fees during part of the permitting process based on the bedroom count for the project and in coordination with the Everett School District. School impact fees would be calculated during permitting and could be subject to change from the current fee structure.

- As development occurs on the site, the project would pay park impact fees consistent with EMC Chapter 19.53 during the permitting process. Park impact fees would be assessed at the time of a complete building permit application and would be collected at permit issuance. Park impact fees are updated annually and could be subject to change from the current fee structure.

- All new buildings would be constructed in accordance with the current International Building Code (as amended by the City of Everett) and the current International Fire Code (as amended by the City of Everett).

- Adequate fire flow would be provided for all new development on the Park District site, in accordance with City of Everett requirements.

Measures Proposed as Part of the Project

- Development under Alternative 1 would include an approximately 1.5-acre publicly accessible park that would feature a meadow, plaza, recreation areas, pavilion, and other recreation and leisure amenities. Other publicly accessible open space would also be provided onsite.
3.11.4 Significant Unavoidable Adverse Impacts

Development under the EIS alternatives would generate additional demand for public services primarily as a result of new population on the site; this demand is unavoidable. Increased demand, however, is not necessarily an adverse impact, if it is adequately planned for and addressed. To the extent that resulting requirements for additional staff, equipment, and facilities are addressed through increased revenues to affected agencies, and through implementation of the mitigation measures listed above, no significant impacts are expected.
3.12 UTILITIES

This section of the DEIS describes the existing utilities (sewer, water, electricity, and natural gas) on and in the vicinity of the Park District site. Potential impacts from development of the EIS alternatives on utilities are evaluated and mitigation measures identified. This analysis is based on the Utilities Report prepared by MIG in August 2023 (see Appendix I).

Methodology

Sanitary Sewer

Information regarding the existing sanitary sewer system conditions was based on information provided by Everett Housing Authority (EHA) and available information from City of Everett Public Works Department.

Existing sanitary sewer flows into the combined sewer were estimated by determining the occupancy and flow per residential units that were occupied on the site prior to the current buildings being vacant or demolished. Estimates for the existing sanitary sewer flows per unit count were based on assumptions from Washington State Department of Ecology (Ecology) Criteria for Sewage Works Design, 2008.

Sanitary sewer flows for each EIS alternative were estimated by determining the occupancy and flow per residential, commercial, and non-residential land use. Residential flows were based on the number of dwelling units and bedrooms multiplied by a standard sanitary sewer collection criterion of 200 gallons per day (gpd) per bedroom. Non-residential use (retail, civic/service and office) flows were based on square footage of the building area. A flow per unit count was applied based on assumptions from the 2008 Ecology Criteria for Sewage Works Design. The Average Daily Flow was estimated in gpd and Peak Hourly Flow from the estimated flows in gallons per minute (gpm) for each quadrant and block of the site.

Water

Information regarding the existing water system conditions was based on information provided by EHA.

Existing water consumption at the former Baker Heights housing site was analyzed by EHA and summarized in a 2004 study of existing infrastructure systems.

Assumptions for water consumption for the various uses under each of the EIS alternatives were based on Washington State Department of Health (DOH) guidelines outlined in the Water System Design Manual, June 2020 edition. The water demands for all uses were combined to provide Average Daily Demand (ADD), Maximum Daily Demand (MDD), and Peak Hourly Demand (PHD). The Average Daily Demand (ADD) values used in the analysis were based on the proposed land use and housing units by quadrants (blocks) for each EIS alternative. To estimate
peak hourly demand and maximum day demand conditions, the 2020 DOH Manual was referenced.

**Electricity and Natural Gas**
Information for electricity and natural gas service was obtained through research and personal communications with Everett Housing Authority (EHA) and Snohomish County PUD No. 1 and Puget Sound Energy.

See Appendix I for details on the methodology used for the utilities analysis.

### 3.12.1 Affected Environment

This sub-section describes the existing utilities that serve the Park District site, including sewer, water, and power service.

**Sanitary Sewer**
The City of Everett Public Works Department provides sanitary sewer service to the site. Everett’s wastewater system serves about 165,000 people, conveying sewage through approximately 345 miles of sewer mains, interceptors, laterals, and 31 lift stations to the Everett Water Pollution Control Facility (EWPCF). In addition, EWPCF treats sewage from three neighboring sewer systems (Mukilteo, Alderwood, and Silver Lake). EWPCF has a rated capacity of 40.3 million gallons per day. EWPCF treated 7.018 billion gallons of wastewater and processed an average of 19.2 million gallons per day during 2021.

The site currently has a private combined sanitary sewer system (conveying both wastewater and stormwater flows) with side sewer laterals that serve the housing units. The laterals have not been upgraded since their installation in the 1940s. The system has exceeded its design life expectancy, is in poor condition, and does not meet current City of Everett standards.

Sewer flows from the site drain into a public combined sanitary sewer stormwater (CSS) piped conveyance system that was built in the 1940s; this system has not been upgraded onsite since 1949. The combined system collects effluent from a series of side sewer laterals serving the housing units, as well as stormwater runoff from inlets and catch basins located along the street. The main combined CSS line currently discharges all the effluent and runoff into a City of Everett 48-inch main that runs through an easement along the east property line of the site. (See Figure 3.2-1 in Section 3.2, Water Resources, for an illustration of the City’s existing combined sanitary sewer and stormwater drainage system.)

The combined sewer mains are a mix of 8- and 10-inch pipes. There has been only one recent main line backup problem. The existing system is undersized by current code. There is some surcharge in the 10-inch sewer line in 12\textsuperscript{th} Street (and likely the 8-inch line in 14\textsuperscript{th} Street) and into the 48-inch combined sewer trunk line during heavy storms.
**Water**

The City of Everett Public Works Department provides water service to the site. As of July 2023, the City of Everett’s water system supplies water to 657,000 people and businesses in the City of Everett and surrounding areas. Most of the City’s water supply, including for the site, is from Spada Reservoir located 30 miles east of Everett at the headwaters of the Sultan River in the Upper Sultan River Watershed, an area encompassing more than 80 square miles. The reservoir has a 50-billion-gallon storage facility that serves as a collection point for rain and snowmelt from the Cascade Mountains. The annual average water usage in 2022 was 53.26 million gallons per day.

**Existing Public Water Distribution**

The site is located within the “Low Service 271 Ft” pressure zone. Service to the site from the adjacent public water mains in the city right of way (ROW) is currently from the 6-inch water main in Pine Street via a master water meter at 14th Street and Pine Street (see Figure 3.2-1, Existing Water System). Based on available records, existing City public water mains within the site include:

- a recently installed 8-inch water main in 14th Street to serve the Baker Heights Legacy project to the south,
- a 6-inch water main in 12th Street from Larch Street to Fir Street installed in 1990, and
- a 6-inch water main installed in 12th Street from Poplar Street to Larch Street installed in 1970.

**Existing Private Water Distribution**

EHA owns and maintains a private water distribution system onsite that was built in the 1940s and supplies domestic water to buildings and fire hydrants. The system has exceeded its design life expectancy, is in poor condition, and does not meet current City of Everett standards.

**Existing Water Distribution**

Water is distributed and looped through the site via a 6-inch pipe that dead ends on Poplar, Larch, Hemlock, and First streets. The domestic service laterals have not been upgraded since their installation in the 1940s. The lines consist of a combination of ¾-, 1-, 1¼- and 1½-inch pipes connected to a 2-inch line that branches off the 6-inch private water main (see Figure 3.12-1, Existing Water System). The existing private water distribution system onsite provides both the domestic services to the buildings and to the fire hydrants.

**Existing Fire Hydrants**

Fire protection is provided by four hydrants located throughout the site and fed by the private distribution system. There are an additional four hydrants located on the south side of 14th Street. The hydrant spacing is typical of requirements in the 1940s. Due to its age, this layout does not meet current City of Everett standards or Fire Marshal requirements. The age of the hydrants and valves and their condition has made regular maintenance difficult.
Figure 3.12-1
Existing Water System
Existing Water Meter

The existing private water distribution on the site is supplied by one master water meter located on Pine Street near the 14th Street intersection in the southeast corner of the site. This meter measures consumption for the entire site; the units are not individually metered.

Based on a 2004 study of existing infrastructure systems by EHA, which looked at water meter readings for the period of May 2001 through January 2003 when the housing units were occupied, an Average Daily Demand (ADD) of approximately 43,400 gallons per day was estimated for the resident population of 548 at the time. Given this, water consumption at the site was estimated to be approximately 80 gallons per resident per day. This is slightly higher than the 75 gallons per day per person consumption rate used by the City of Everett Public Works Department for estimating multifamily housing water use.

Electricity and Natural Gas

Electrical service to the site is provided by Snohomish Public Utility District (PUD) No. 1. Many of the existing utility poles near the site are between 40 and 60 years old and are showing signs of exterior dry rot. Some poles are in curb ramps, creating an obstacle for pedestrians and restricting the ability of the ramp to comply with the Americans with Disabilities Act. The utility lines are low enough to create clearance issues for semi-trucks, as well as man-lift clearances. Currently, the vertical clearance for these lines has been grandfathered in.

Gas service to the site is provided by Puget Sound Energy. There are no known issues with gas service to the site.

See Figure 3.12-2, Existing Electrical and Gas Service Distribution.

3.12.2 Impacts of the Alternatives

An analysis of the potential utility impacts of the Park District Project is provided below for the EIS alternatives. For the purposes of this analysis, it is anticipated that potential impacts would be the same under Alternatives 1 and 2 since both alternatives assume the same development program. For Alternative 3, the analysis focuses on any differences between this alternative and Alternatives 1 and 2 (other aspects of Alternative 3 are expected to be similar to Alternatives 1 and 2).

Alternatives 1 and 2

Development of the approximately 16-acre Park District site would include the following land uses under both Alternative 1 (Proposed Action) and Alternative 2 (Design Alternative):
Park District Project
Draft EIS

Figure 3.12-2
Existing Electrical and Gas System

- **Residential** – up to approximately 1,500 multifamily residential units with approximately 3,645 residents;
- **Non-Residential** – up to approximately 70,600 gross sq. ft. (GSF), broken down as follows:
  - Retail – 20,200 GSF;
  - Civic – 26,400 GSF; and
  - Office – 24,000 GSF.

See **Table 2-2** in **Chapter 2** for a summary of land uses under Alternatives 1 and 2.

**Sanitary Sewer**

The City of Everett would continue to provide sewer service to the site for the proposed development under Alternatives 1 and 2.

**Sanitary Sewer Flow Estimate**

**Table 3.12-1** provides the assumptions for estimating sewer flows, **Table 3.12-2** a summary of sewer design assumptions for the population, and **Table 3.12-3** a summary of estimated sewer flows for existing conditions and the EIS alternatives. The existing conditions assumptions and analysis shown in **Table 3.12-2** and **Table 3.12-3** is based on the 223 units that are presently located on the Park District site and assumptions for their previous occupancy. The site is currently vacant and it is assumed that the existing buildings will be demolished and removed as a separate action prior to redevelopment of the site under the proposed action. The estimation of sanitary sewer flow from the former development onsite is provided for comparison with Alternatives 1 and 2.

**Table 3.12-1**

<table>
<thead>
<tr>
<th>Building Use/Discharge Facility</th>
<th>Design Unit</th>
<th>Unit</th>
<th>Flow (gpd)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential - Apartment</td>
<td>per bedroom</td>
<td>1 bedroom</td>
<td>200</td>
</tr>
<tr>
<td>Non-residential (retail, civic/service and office uses)</td>
<td>Per area of floor space</td>
<td>1000 sf</td>
<td>300</td>
</tr>
</tbody>
</table>

**Source:** MIG 2023.

**gpd=gallons per day    sf=square feet**

---

1 Residential units are assumed to be medium- to high-density multifamily apartments. Residential units would include a range of bedroom counts, including studio (293 units), 1-bedroom (879 units), 2-bedrooms (296 units), 3-bedrooms (26 units), and 5-bedrooms (6 units).

2 The estimate of new residents is based on an average household size in City of Everett of 2.43 persons per household from the **U.S. Census Bureau, American Community Survey (ACS), 5-Year Estimates, 2017-2021**.
### Table 3.12-2
SUMMARY OF SEWER DESIGN ASSUMPTIONS FOR POPULATION

<table>
<thead>
<tr>
<th>Development Type</th>
<th>Units</th>
<th>Bedrooms</th>
<th>Population (thousands)</th>
<th>Peak Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Condition</td>
<td>223</td>
<td>408</td>
<td>0.82</td>
<td>3.9</td>
</tr>
<tr>
<td>Alternative 1 – Proposed Action</td>
<td>1,500</td>
<td>1,872</td>
<td>3.80</td>
<td>3.4</td>
</tr>
<tr>
<td>Alternative 2 – Design Alternative</td>
<td>1,500</td>
<td>1,872</td>
<td>3.80</td>
<td>3.4</td>
</tr>
<tr>
<td>Alternative 3 – No Action</td>
<td>458</td>
<td>548</td>
<td>1.10</td>
<td>3.8</td>
</tr>
</tbody>
</table>

Source: MIG 2023.

Notes:
1. P = Population in thousands
2. Assume two people per bedroom
3. Peak Factor = Q peak hourly / Q peak design average = \[\frac{[18+(P)^{0.5}]}{[4+(P)^{0.5}]}\]
4. Number of Bedrooms estimated based on distribution of unit sizes per building.

### Table 3.12-3
SUMMARY OF SANITARY SEWER ESTIMATED FLOWS

<table>
<thead>
<tr>
<th>Development Type</th>
<th>Average Daily Flow (gpd)</th>
<th>Peak Hourly Flow (cfs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Condition</td>
<td>81,600</td>
<td>0.49</td>
</tr>
<tr>
<td>Alternative 1 – Proposed Action</td>
<td>396,000</td>
<td>2.09</td>
</tr>
<tr>
<td>Alternative 2 – Design Alternative</td>
<td>396,000</td>
<td>2.09</td>
</tr>
<tr>
<td>Alternative 3 – No Action</td>
<td>110,000</td>
<td>0.64</td>
</tr>
</tbody>
</table>

Source: MIG 2023.
gpd= gallons per day   cfs=cubic feet per second

**Sanitary Sewer Distribution System**

A new sanitary sewer system would be installed in the new streets and portions of the existing street grid under Alternatives 1 and 2. The new sanitary sewer mains in the new streets would convey flow to the existing 48-inch combined sewer at the northeast corner of the site. Design for the new sanitary sewer mains would be in accordance with City of Everett requirements along with other Ecology requirements.

Construction of proposed sewer improvements for Alternatives 1 and 2 would be scheduled with other infrastructure improvements including water, stormwater control, street, and other utilities. Interruptions of sewer services to current users adjacent to the site would be minimized. A temporary bypass when connecting to existing combined sewer mains would occur to continue service to adjacent properties.

Wastewater and stormwater flows from the project would be separated into different lines prior to discharge into the 48-inch combined main that runs along the east site boundary (see Figure 3.12-1). A new 8-inch sanitary sewer mains would be constructed in Hemlock Street and Fir Street.
• Side sewers from the SW and NW quadrants of the site would connect to the new 8-inch sewer main in Hemlock Street. The main in Hemlock Street would connect to the existing sanitary sewer in 12th Street, which connects to the existing 48-inch combined sewer main at the northeast corner of the site.
• Side sewers from the SE and NE quadrants of the site would connect to the new 8-inch sewer main in Fir Street. The new main would connect to the existing 48-inch combined sewer main at the NE corner of the site.

(See Figure 3.12-3, Public Sewer System – Alternatives 1 and 2.)

Estimates for sanitary sewer flows for Alternative 1 and 2 are shown in Table 3-12.3. It is assumed that no major upgrades to the city sewer system downstream of the site would be required to serve the proposed development under Alternatives 1 and 2 as they have adequate capacity to serve the project.

**Water**

The City of Everett would continue to provide water service to the site for the proposed development under Alternatives 1 and 2.

**Average Day, Maximum Day, and Peak Hour Demands**

This section evaluates the water demand impacts of existing conditions and the EIS alternatives at full buildout. Similar to the sanitary sewer analysis, the estimation of water demand from the former development onsite is provided for comparison Alternatives 1 and 2.

As noted above, a water demand analysis was conducted to assess existing conditions and the EIS alternatives. See Table 3.12-4 for summary of the basis for water demand use. Based on the assumptions in Table 3.12-4, the Average Daily Demand (ADD), Maximum Daily Demand (MDD), and Peak Hour Demands (PHD) water demands for existing conditions and the EIS alternatives are summarized in Table 3.12-5. See Table 3.1-3 in Appendix I for a summary of the water demand by each block/quadrant within the EIS alternatives.

**Table 3.12-4**

**BASIS OF WATER SYSTEM DESIGN FOR TYPICAL AVERAGE DAILY DEMAND**

<table>
<thead>
<tr>
<th>Type of Establishment</th>
<th>Design Unit</th>
<th>No.</th>
<th>Unit</th>
<th>ADD (gpd)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td>Per Apartment</td>
<td>1</td>
<td>ERU</td>
<td>200¹</td>
</tr>
<tr>
<td>Non-residential Use (retail, civic/service and office use)</td>
<td>Floor Space</td>
<td>1,000</td>
<td>sf</td>
<td>300²</td>
</tr>
</tbody>
</table>

¹Source: DOH Water System Design Manual, June 2020, Appendix D for residential units without yards/landscape
²Source: MIG analysis assumes 200 sf floor area per occupant/visitor and 50 gallon per person per day use
SF = square feet
ERU = Equivalent Residential Unit
ADD = Average Day Demand
Proposed Public Sanitary Sewer for Alternatives 1 and 2

Legend:
- Existing Public Combined Sewer (PCS)
- Proposed Public Sanitary Sewer (PSS)
- Proposed Sanitary Sewer Service

Figure 3.12-3

Table 3.12-5

SUMMARY OF WATER DEMAND ESTIMATE

<table>
<thead>
<tr>
<th>Development Type</th>
<th>ADD (gpd)</th>
<th>MDD (gpd)</th>
<th>PHD (gpm)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Condition</td>
<td>44,600</td>
<td>89,200</td>
<td>163</td>
</tr>
<tr>
<td>Alternative 1 – Proposed Action</td>
<td>387,000</td>
<td>775,000</td>
<td>1,745</td>
</tr>
<tr>
<td>Alternative 2 – Design Alternative</td>
<td>387,000</td>
<td>775,000</td>
<td>1,745</td>
</tr>
<tr>
<td>Alternative 3 – No Action</td>
<td>105,000</td>
<td>209,000</td>
<td>476</td>
</tr>
</tbody>
</table>

Source: MIG 2023.
ADD = Average Daily Demand
MDD = Maximum Daily Demand (2x ADD assumed)
PHD = Peak Hourly Demand
gpd = gallons per day
gpm = gallons per minute

Minimum System Pressure
The project would maintain the City's normal service pressure, as described in Affected Environment.

Fire Flow
The project would meet the City's fire flow requirements. The required fire flow is function of the size of a building and the type of construction as described in Chapter 16.03 of the City Municipal Code. The code allows for reductions in fire flow if automatic sprinklers systems are used in buildings. For all the EIS alternatives, the proposed buildings would have sprinklers and meet the requirement for fire flow reductions. Coordination will be provided with the City Fire Marshall to determine required fire flow given the assumed building types.

Irrigation Demand
Typically, irrigation takes place during off-peak water demand hours; therefore, irrigation demands were not included in the modeling of the water mains. Irrigation demand was estimated for each EIS alternative based on the proposed natural/park space areas. The maximum irrigation demand was assumed to occur during the month of July with a maximum irrigation demand of one inch per week, the daily demand estimate for irrigation was determined to be only a small percentage of the total water demand for the Park District Project. Table 3.12-6 shows the irrigation demand for each EIS alternative..
Table 3.12-6
SUMMARY OF WATER DEMAND ESTIMATE

<table>
<thead>
<tr>
<th>Development Type</th>
<th>Acres</th>
<th>SF</th>
<th>MDD* (gpd)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alternative 1 – Proposed Action</td>
<td>3.5</td>
<td>152,500</td>
<td>13,600</td>
</tr>
<tr>
<td>Alternative 2 – Design Alternative</td>
<td>3.3</td>
<td>143,800</td>
<td>12,800</td>
</tr>
<tr>
<td>Alternative 3 – No Action</td>
<td>4.9</td>
<td>213,500</td>
<td>19,000</td>
</tr>
</tbody>
</table>

*Source: MIG 2023.*

Gpd = gallons per day

Maximum Day Demand (MDD) for gallons per day (gpd) assumes 1-inch is applied per week and averaged over 7 days of the week based on usage in the month of July.

Water Distribution System

For Alternatives 1 and 2, the existing private water system would be replaced with new public water mains and fire hydrants to bring the water system up to current City of Everett standards. New water service connections would be provided to the new buildings.

Construction of proposed water improvements for Alternatives 1 and 2 would be scheduled with other infrastructure improvements, including sewer, stormwater control, street, and other utilities.

New public eight-inch water mains would be installed in the ROW of Poplar, Hemlock, and Fir Streets and connect to an 8-inch water main in 12th and 14th Streets. Portions of the existing public six-inch water main in 12th Street would be replaced with an 8-inch pipe. The new 8-inch water main in 14th Street would remain. (See Figure 3.12-4, Water System – Alternatives 1 and 2.)

New water meters would be installed to provide fire and domestic service. Each building would be separately metered and have one domestic and fire service. Water service to the buildings within a quadrant/block would come from the public water main along the street frontage. Estimates for water demand under Alternatives 1 and 2 are shown in Table 3.12-6. It is assumed that no major upgrades to the city water system would be required to serve the proposed development as there is adequate water supply and system capacity to serve Alternatives 1 and 2.

Electricity and Natural Gas

Snohomish PUD No. 1 would continue to provide electrical service to the site and Puget Sound Energy would continue to provide gas service to the site for the EIS alternatives. (See Figure 3.12-5, Electricity and Natural Gas – Alternatives 1 and 2.)
Figure 3.12-4

Alternative 1 and 2 Public Water Main System

NOTE: Alternative #1 - Proposed Action is shown herein. Quadrants/Blocks and water main system are same for Alternative #2. In Alternative #2, the park space is revised to have buildings.
Figure 3.12-5

Proposed Power and Gas Lines for Alternatives 1 and 2


NOTES:
1. FRANCHISE (ZIP/Y AND COMCAST) TO FOLLOW POWER ALIGNMENT.
2. NO GAS SERVICES ARE PLANNED FOR NEW DEVELOPMENT.
3. POWER FOR STREET LIGHTS TO BE PROVIDED (NOT SHOWN).
Electricity would be used for 100% of the energy for the project’s heating and residential appliances. Electrical lines onsite would largely be below-ground. The electrical line along 12th Street and Poplar Street could remain above ground. Natural gas could be used by the non-residential uses (e.g., for restaurant cooking and back-up generators, per code) and would continue to be provided by Puget Sound Energy. (See Figure 3.12-5, Electricity and Natural Gas – Alternatives 1 and 2). No major upgrades to the Snohomish PUD No. 1 or Puget Sound Energy systems would be required to serve Alternatives 1 and 2.

**Alternative 3 - No Action**

Under Alternative 3, the No Action Alternative, the site would remain in its existing condition. All the existing buildings and landscaping would remain for the time being, but demolition and removal of the buildings will ultimately occur under a separate action. Assumed redevelopment of the site under existing zoning would feature residential uses, no non-residential uses would be included. Approximately 458 housing units would be provided which would accommodate approximately 1,113 residents³.

**Sanitary Sewer**

The City of Everett would continue to provide sewer service to the site under Alternative 3. The existing EHA owned and maintained private sewer service and sanitary sewer mains would be replaced to meet current city requirements for a separated system. New sewer mains would be installed in the existing street grid (within the widened ROW). Wastewater and stormwater flow from Alternative 3 would be separated into different sewer lines prior to discharge into the 48-inch combined main that runs along the east site boundary. Estimates for sanitary sewer flows for Alternative 3 are shown in Table 3-12.3. It is assumed no major upgrades to the city sewer system downstream of the site would be required to serve Alternative 3.

**Water**

The City of Everett would continue to provide water service to the site under Alternative 3. To bring the existing water system up to current code and Fire Marshal requirements, the existing private distribution system within the existing street grid would be replaced with new public water mains, 6-inch or larger diameter pipes, and connect to existing public water mains in 12th Street and 14th Street. The existing 6-inch water main in 12th Street would be replaced. New meters would be installed off the new mains and service each block of housing. New fire hydrants off the public mains would be installed and located per current City standards and code. Estimates for water demand for Alternative 3 are shown in Table 3.12-6. It is assumed that no major upgrades to the city water system would be required to serve Alternative 3.

³ Ibid 1.
**Electricity and Natural Gas**

Snohomish PUD No. 1 would continue to provide electrical service to the site under Alternative 3. Electricity would be used for 100% of the energy for the project’s heating and residential appliances. Electrical lines onsite would largely be below-ground. The electrical line along 12th Street and Poplar Street may remain above ground. Natural gas could be used and provided by Puget Sound Energy. No major upgrades to the Snohomish PUD No. 1 or Puget Sound Energy systems would be required to serve Alternative 3.

**Cumulative Impacts**

The City of Everett is currently in the process of updating their Comprehensive Plan. In August 2023, the City Council approved three growth alternatives for analysis as part of the update process, including Alternative 1 – Extend Current Plans, Alternative 2 – Concentrated Growth Pattern, and Alternative 3 – Dispersed Growth Pattern. The City intends to complete the update process in 2024 (see the City of Everett’s website for further details on their Comprehensive Plan Update process). Updates to the Comprehensive Plan could result in the potential for additional development in the vicinity of the Park District site and associated cumulative increases in demand for utilities. It is assumed that necessary improvements, extensions, or connections to existing utilities associated with any other projects adjacent to the site would be designed and constructed in compliance with the applicable City of Everett regulations, like for the Park District. As a result, no significant cumulative utility impacts are anticipated from these other projects, in combination with the Park District redevelopment.

**Conclusion**

Utilities to the site are provided by the following purveyors: water and sewer - City of Everett; electricity - Snohomish Public Utility District PUD No. 1, and gas - Puget Sound Energy.

Development under Alternatives 1, 2, or 3 would generate additional demand for utilities during operation of the project. Alternatives 1 and 2 would generate the same demand for utilities as they assume the same development program. Alternative 3, the No Action Alternative, would result in less future development, shorter buildout periods, fewer residents, and a reduced demand for public services. The City’s water and sanitary sewer systems, and the electricity and natural gas systems have adequate capacity to serve the EIS alternatives.

### 3.12.3 Mitigation Measures

The following measures have been identified to address the potential utility impacts from construction and operation of the Park District Development Project. These measures apply to all the alternatives unless otherwise noted. **Legally-Required Measures** are measures that are required by code, laws or local, state, and federal regulations to address significant impacts. **Measures Proposed as Part of Project** are measures incorporated into the project to reduce
impacts. Other Possible Measures are additional measures that could be implemented to address impacts but are not necessary to mitigate significant impacts.

**Legally-Required Measures**

**Water and Sewer**

- The design and construction of all water distribution facilities and the public sanitary sewer system would comply with the City of Everett Department of Public Works regulations.

- Water mains and the public sewer system would be located within the site's new roadway network or easements, consistent with the City of Everett Public Works regulations and design standards.

**Electricity and Gas**

- The design and construction of electrical and gas utilities would comply with the City of Everett regulations and the utility purveyors’ requirements.

**3.12.4 Significant Unavoidable Adverse Impacts**

With implementation of the mitigation measures listed above, no significant utility impacts are expected.
3.13 ENVIRONMENTAL JUSTICE and SOCIOECONOMICS

This section of the DEIS describes the environmental justice and socioeconomic-related conditions on and near the Park District site. Potential impacts, including disproportionate and/or adverse impacts from redevelopment of the EIS alternatives are evaluated, and mitigation measures identified.

Methodology

Information and analysis in this section is largely based on U.S. Census data (2021, American Community Survey, 5-year estimates), the Climate and Economic Justice Screening Tool (CEJST), and the EPA EJ Screening and Mapping Tool.

Background

According to the U.S. Environmental Protection Agency (EPA), environmental justice is:

“the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies. Meaningful involvement means that: 1. People have an opportunity to participate in decisions about activities that may affect their environment and/or health; 2. The public’s contribution can influence the regulatory agency’s decision-making process; 3. Community concerns will be considered in the decision-making process; and 4. Decision-makers seek out and facilitate the involvement of those potentially affected.”¹

According to the EPA, “low-income population” means any readily identifiable group of low-income persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by the proposed policy or activity.

According to the EPA, a “minority population” is considered to be present if the minority population percentage of the affected area is greater than the minority population percentage in the general population or other appropriate unit of geographic analysis (census tracts are generally considered appropriate).

Disproportionately high and adverse effect means that an adverse effect is predominantly borne by a minority population and/or a low-income population and that the effect that will

be suffered by the minority population and/or low-income population is appreciably more severe or greater in magnitude than that borne by the rest of the population.

### 3.13.1 Affected Environment

This sub-section describes the existing environmental justice and socioeconomic conditions on and near the Park District site.

**Site**

The site is currently vacant and occupied by a former affordable housing development, including multifamily residential, recreational (play areas and a community garden), and open space/landscaping. The existing units will be demolished and removed under a separate action. There are no residents, no jobs, and no occupied housing on the site under existing conditions.

**Site Vicinity**

The Park District site is located in the Delta neighborhood in northeast Everett. The site vicinity is comprised of residential, school, institutional, open space, and recreational uses.

The site is located within a census tract that is designated as disadvantaged in the CEJST because it meets more than one burden threshold and the associated socioeconomic threshold. The burden thresholds that are currently met by the census tract include those related to climate change, health, housing, water and wastewater, and workforce development challenges from low median income and high school education.

To further characterize existing conditions, socioeconomic data are provided for the Park District site vicinity and are compared to the city of Everett as a baseline. The Park District site vicinity is defined as the U.S. Census Tract in which the site is located (Census Tract 402). See Figure 3.7-1 in Section 3.7, Housing, for a Census Tract Map.

**Population**

According to data from the EJ Screen, 40% of the population within the Park District vicinity (Census Tract 402) are people of color (i.e., black, American Indian, Asian, Pacific Islander, some other race, two or more races, or Hispanic) (see Table 3.13-1).
Table 3.13-1
POPULATION BY RACE

<table>
<thead>
<tr>
<th>Population Characteristics</th>
<th>Park District Vicinity</th>
<th>City of Everett</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>6,736</td>
<td>110,840</td>
</tr>
<tr>
<td>People of Color Population</td>
<td>40%</td>
<td>38%</td>
</tr>
<tr>
<td>Population Reporting One Race</td>
<td>6,065 (90%)</td>
<td>103,520 (93.4%)</td>
</tr>
<tr>
<td>- White</td>
<td>4,967 (70%)</td>
<td>77,701 (70.1%)</td>
</tr>
<tr>
<td>- Black</td>
<td>231 (3%)</td>
<td>6,250 (5.6%)</td>
</tr>
<tr>
<td>- American Indian</td>
<td>51 (1%)</td>
<td>806 (0.7%)</td>
</tr>
<tr>
<td>- Asian</td>
<td>616 (9%)</td>
<td>10,537 (9.5%)</td>
</tr>
<tr>
<td>- Pacific Islander</td>
<td>459 (7%)</td>
<td>988 (0.9%)</td>
</tr>
<tr>
<td>- Some Other Race</td>
<td>29 (0%)</td>
<td>7,238 (6.5%)</td>
</tr>
<tr>
<td>Population Reporting Two or More Races</td>
<td>671 (10%)</td>
<td>7,320 (6.6%)</td>
</tr>
<tr>
<td>Total Hispanic Population</td>
<td>789 (12%)</td>
<td>18,282 (16.5%)</td>
</tr>
</tbody>
</table>


1 The Park District Vicinity is defined as Census Tract 402.

Table 3.13-2 shows that the share of the population that is male is higher in the city of Everett (51.8%) as compared to the Park District site vicinity, which has a more balanced split between the male and female population. In the site vicinity, the share of population under age 18 is nearly 8% higher and the share of the population that is over age 65 is 2.7% lower, compared to those shares for the city of Everett. In the Park District vicinity, the share of population that is foreign-born is 7.3% lower and the share of the population that speaks English less than “very well” is 1.5% lower, compared to those shares for the city of Everett.

Table 3.13-2
POPULATION CHARACTERISTICS – PARK DISTRICT VICINITY

<table>
<thead>
<tr>
<th>Population Characteristics</th>
<th>Park District Vicinity</th>
<th>City of Everett</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>6,058</td>
<td>110,438</td>
</tr>
<tr>
<td>- Male</td>
<td>3,017 (49.8%)</td>
<td>57,228 (51.8%)</td>
</tr>
<tr>
<td>- Female</td>
<td>3,041 (50.2%)</td>
<td>53,210 (48.2%)</td>
</tr>
<tr>
<td>% Population Under Age 18</td>
<td>28%</td>
<td>20.2%</td>
</tr>
<tr>
<td>Population Age 65 and Older</td>
<td>10.7%</td>
<td>13.4%</td>
</tr>
<tr>
<td>Population with a Disability</td>
<td>1,328 (22.4%)</td>
<td>60,663 (9.4%)</td>
</tr>
<tr>
<td>Foreign-Born Population</td>
<td>774 (12.8%)</td>
<td>22,213 (20.1%)</td>
</tr>
<tr>
<td>Speak English Less Than ‘Very Well’</td>
<td>10.3%</td>
<td>11.8%</td>
</tr>
</tbody>
</table>

Source: 2021 ACS 5-Year Estimates.

1 Census Tract 402
Income

The Department of Housing and Urban Development (HUD) defines low-income categories as follows:\(^2\)

- Extremely low-income at or below 30% of AMI
- Very low-income at or below 50% of AMI
- Low-income at or below 80% of AMI

These income categories established by HUD are used by states and local jurisdictions, including the city of Everett, for purposes of administering affordable housing programs and funding.

Area median income, or AMI, is the annual median family income for the Everett area (the King-Snohomish county region, not just the city), as published by HUD, with adjustments for household size, assuming 1 person for a studio apartment and 1.5 people per bedroom for other units. According to HUD, the median family income for 2023 is $146,500.\(^3\)

For purposes of comparison between the Park District vicinity and city of Everett only, Table 3.13-3 shows the median household income as reported to the U.S. Census Bureau.\(^4\) The Census median household income is different than and therefore not comparable to the area median income measure used by HUD. The Census median household income based on the 2021 American Community Survey is $41,319 in Census Tract 402, compared to $71,357 for the city of Everett.

<table>
<thead>
<tr>
<th>Table 3.13-3</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>INCOME INFORMATION – PARK DISTRICT VICINITY</strong></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Total Population</td>
</tr>
<tr>
<td>Total Number of Households</td>
</tr>
<tr>
<td>Median Household Income</td>
</tr>
</tbody>
</table>

Source: 2021 American Community Survey 5-Year Estimates.

\(^1\) Census Tract 402

Elementary School Characteristics

Table 3.13-4 presents the characteristics of the public elementary school that currently serves the project area: Hawthorne Elementary. As shown, Hawthorne Elementary serves a similar percentage of minority students as compared to the district and state averages (approximately 28% versus the Everett Public School District average of 51.5% and the state average of 38%).

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\(^2\) 42 U.S.C. 1437a(b)(2).
\(^3\) HUD. FY 2023 Income Limits Summary. Seattle-Bellevue, WA HUD Metro FMR Area.
\(^4\) HUD’s “area median income” (AMI) is used to determine eligibility for a wide variety of affordable housing programs; it is not comparable with “median household income,” as reported by the U.S. Census Bureau.
average of 42%). Approximately 73% of the students attending Hawthorne Elementary are characterized as low-income and participate in free or reduced-price lunch programs compared to 38% of students in the Everett Public School District.

Table 3.13-4
ELEMENTARY SCHOOL CHARACTERISTICS

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Hawthorne Elementary School</th>
<th>Everett Public Schools</th>
<th>State Average</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>41%</td>
<td>42.1%</td>
<td>53%</td>
</tr>
<tr>
<td>African American</td>
<td>6%</td>
<td>4.8%</td>
<td>4%</td>
</tr>
<tr>
<td>Asian or Asian/Pacific Islander</td>
<td>4%</td>
<td>18.8%</td>
<td>7%</td>
</tr>
<tr>
<td>Two or more races</td>
<td>7%</td>
<td>9.4%</td>
<td>8%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>35%</td>
<td>21.4%</td>
<td>23%</td>
</tr>
<tr>
<td>Native American</td>
<td>1%</td>
<td>0.5%</td>
<td>1%</td>
</tr>
<tr>
<td>Hawaiian Native/Pacific Islander</td>
<td>5%</td>
<td>1.6%</td>
<td>1%</td>
</tr>
<tr>
<td>Students Participating in Free or Reduced-Price Lunch Program / Students from Low-income Families</td>
<td>73%</td>
<td>38%</td>
<td>43%</td>
</tr>
</tbody>
</table>

Source: [www.greatschools.org](http://www.greatschools.org), accessed May 2023 and [Everett Public Schools](https://www.everett.k12.wa.us), Annual Report to the Community 2022-23.

Environmental Health and Safety Risks to Children

On April 21, 1997, Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, was issued, directing federal agencies to ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks. The Order recognizes that children may disproportionately suffer from environmental health and safety risks, due to the developing neurological, immunological, digestive, and other bodily systems of children. Young children are particularly at higher risks for exposure to lead-based paint (LBP) and lead contaminated soils because of their behavioral traits. Therefore, to the extent permitted by law and regulations, and consistent with the agency’s mission, federal agencies were directed to (1) identify and assess environmental health and safety risks that may disproportionately affect children and (2) ensure that the agency’s policies, programs, and standards address disproportionate health risks to children that result from environmental health or safety risks. Examples of risks to children could include increased traffic volumes and industrial or production-oriented activities that would generate substances or pollutants children may come into contact with or ingest. Although the proposal evaluated in this DEIS is not currently associated with federal approvals or agencies, disproportionate risks to children are considered in the event that federal agencies are involved in the future.

In the Park District site vicinity, there are at least five childcare centers within one mile of the site. Additionally, the site is adjacent to Wiggums Hollow Park, single-family residential development to the east, south, and southeast, multifamily residential development to the
north and south, a school to the northeast (Hawthorne Elementary) and open space and recreational uses to the west.

Employment
Presently, there are no active uses on the Park District site and no economic activity is directly associated with the site.

With unemployment rates of 1.5% in Census Tract 402, the vicinity contains lower ratios of unemployed people than the City of Everett overall, at approximately 3.3%. The U.S. Census Bureau defines employed people as all civilians 16 years old and over who worked as paid employees, worked in their own business or profession, worked on their own farm, or worked 15 hours or more as unpaid workers on a family farm or in a family business. Individuals whose activity consisted of work around the house or unpaid volunteer work for religious, charitable, and similar organizations are excluded from the ‘employed’ category. Table 3.13-5 summarizes the employment characteristics for the Park District vicinity and the City of Everett.

<table>
<thead>
<tr>
<th>EMPLOYMENT CHARACTERISTICS – PARK DISTRICT VICINITY</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Park District Vicinity</strong></td>
</tr>
<tr>
<td>Population 16 years and older</td>
</tr>
<tr>
<td>People in Civilian Labor Force</td>
</tr>
<tr>
<td>Employed</td>
</tr>
<tr>
<td>Unemployed</td>
</tr>
</tbody>
</table>

Source: 2021 American Community Survey 5-Year Estimates.

City of Everett Growth Plans – Employment
The 2021 Snohomish County Buildable Land Report notes that the City of Everett’s employment in 2019 was at 99,796 jobs, with a target of 140,000 jobs by 2035 (an increase of 40,204 jobs).

The Vision 2040 regional growth strategy designates Everett as one of five metropolitan cities in the region, and projects an additional 50,000 jobs in Everett by 2035, more than 37% of the share of total job growth within the county. While the City’s land use plan provides sufficient capacity for this growth, adopted targets for employment growth are lower than the guidance provided in Vision 2040. The Everett 2035 Comprehensive Plan targets economic growth totaling a minimum of 140,000 jobs within the city by 2035. Total employment in Everett was estimated at approximately 101,509 jobs in 2023; therefore, 38,491 new jobs would be targeted in the City by 2035.

The Comprehensive Plan notes that while there is a sufficient supply of industrial land in the City, there is little undeveloped commercial land available for new development. Most future commercial development would need to occur in the form of redevelopment of currently developed properties to higher density uses. The Park District site is presently
located within an area designated for multi-family uses in the *Everett 2035 Comprehensive Plan*.

**City of Everett Growth Plans – Population**

The *2021 Snohomish County Buildable Land Report* notes that the City of Everett’s population was at 111,794 in 2019, with a population target of 164,812 by 2035 (an increase of 53,018 people). However, a significant population capacity shortfall was identified for the city, with the actual 2035 population capacity estimated at 151,063.

### 3.13.2 Impacts of the Alternatives

An analysis of the potential environmental justice and socioeconomics impacts of Alternative 1, the Proposed Action, is provided below. For the other alternatives, the analyses focus on any differences between the alternatives and Alternative 1 (other aspects of these alternatives are expected to be similar to Alternative 1).

**Meaningful Involvement**

An important component of ensuring environmental justice requires that decision-makers afford potentially affected people (in this case, future project residents and other community stakeholders) the opportunity to participate in and influence decisions that may affect their environment and/or health. Decision-makers should facilitate participation and consider stakeholder input in their decision-making process. This type of participation is termed ‘meaningful involvement’.

The City of Everett has been engaging the community in the ongoing redevelopment planning for the Park District project and is engaging the community in the State Environmental Policy Act (SEPA) review process for the project to ensure meaningful involvement. On February 1, 2023, the City issued a Determination of Significance (DS) and Request for Comments on the Scope of the EIS on the project. The DS indicated that there would be a 21-day EIS scoping period, and that a virtual public meeting would be held during the scoping period. Meeting attendees could provide oral or written comments on the scope of the EIS. The public was also invited to submit written or email comments during the EIS scoping period. Scoping comments were used to refine and inform the alternatives and analysis provided in this EIS (see Appendix A for the Summary of the Public Scoping Process).

The opportunity for further public engagement will occur during a 30-day comment period following issuance of this DEIS. A public meeting will be held during the comment period on November 16, 2023, from 6:00 to 8:00 PM at the Baker Heights Community Center Large Hall (see the Fact Sheet for details). Meeting attendees can provide verbal or written

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5 *Everett 2035 Comprehensive Plan*, Ch. 2 Land Use, Land Use Designation Map, p. 22.
comments on the DEIS at the meeting. The public are also invited to submit written or email comments during the DEIS comment period. Responses to the DEIS comments will be provided in the FEIS.

In addition to involvement through the SEPA process, Everett Housing Authority (EHA) has held a number of public meetings about the proposed project. The purpose of the meetings was to share information about the project and design and to gather community feedback and ideas about ways to improve the design programming.

Also, public input and participation associated with the Park District planning process was used to develop a set of guiding principles and planning concepts for the project. These principles and concepts, used together with other relevant documents, such as local and regional plans and policies, serve as a foundation for the project objectives. See Chapter 2, Section 2.6, for a detailed list of the primary objectives of the proposal.

**Alternative 1 – Proposed Action**

**Environmental Justice**

**Construction**

During construction for Alternative 1, temporary noise from demolition, site preparation and construction of infrastructure and buildings could affect nearby populations. Construction activities would be subject to applicable city of Everett noise limits, and noise mitigation measures would be implemented to reduce the extent to which people are affected by construction noise. Overall, the temporary nature of construction coupled with restriction to daytime hours and the implementation of noise mitigation measures would minimize the potential for significant noise impacts from construction activities and equipment, and no significant impacts are expected (see Section 3.5, Noise, and Appendix F for details).

Construction activities could affect air quality due to emissions from construction-related sources and equipment and dust from construction activities including grading, cutting, and filling. Some construction phases could also cause odors, particularly during paving operations using tar and asphalt. Construction contractors would be required to comply with regulations requiring that reasonable precautions be taken to minimize dust emissions and prohibit air contaminants in quantities likely to be injurious to human health, plant or animal life or property, or which unreasonably would interfere with enjoyment of life and property. Overall, with implementation of the controls required for the various aspects of construction activities and consistent use of best management practices to minimize on-site emissions, construction is not expected to significantly impact air quality (see Section 3.2, Air Quality, for details).

Existing environmental health hazards are present onsite, including soil contaminants from the former Asarco Smelter. These contaminants could be disturbed during construction of
the Park District project. Prior to construction under the EIS alternatives, study and cleanup of materials from the Asarco Smelter would occur in accordance with Washington State Department of Ecology requirements, and health hazards would be stabilized (see Section 3.1, Earth, and Appendix B for details).

The construction site could also create an attractive nuisance, resulting in safety impacts, during redevelopment. However, the areas of the site undergoing construction would be secured and made non-accessible after-hours to avoid this potential safety issue.

Overall, the type of construction activity and impacts that would occur onsite under Alternative 1 would be similar in nature to other large development projects occurring throughout the City and County and would be carried out in compliance with the city of Everett Municipal Code and other applicable regulations. Therefore, the potential for disproportionately high or adverse impacts to low income or minority communities or persons during construction--impacts appreciably more severe or greater in magnitude than that borne by the community at large, in this case the city of Everett--would be minimal.

Significant environmental health or safety risks to children in the vicinity, including from increased traffic volumes during construction, are not anticipated (see Section 3.10, Transportation, and Appendix H for details).

**Operation**

**Site**

Redevelopment of the Park District site under Alternative 1 would result in a mixed-income, mixed-use community. The following evaluates environmental justice-related public health impacts that could occur following redevelopment of the site.

No significant noise impacts are expected during operation of the project under Alternative 1 (i.e., due to increased traffic on area roadways or due to human voices and activity and maintenance uses associated with outdoor uses) (see Section 3.5, Noise, and Appendix F for details).

Similar to noise, no significant air quality impacts are expected during operation of the project under Alternative 1 (i.e., due to increased traffic on area roadways) (see Section 3.4, Air Quality, for details).

**Site Vicinity**

Development of mixed-use development and park uses on the Park District site is not expected to result in environmental health or safety risks to children present within the vicinity. Traffic would increase in the vicinity, and it is statistically possible that the number of collisions could increase. However, the project is not expected to create any additional
safety concerns at locations recording the highest number of collisions. The project would reconstruct the grid of streets on and adjacent to the Park District site and would provide amenities for pedestrians and bicyclists. These improvements are expected to improve safety compared to the existing conditions (see Section 3.10, Transportation, and Appendix H for details).

The primarily medium- and high-density, affordable and mixed-income housing provided onsite under Alternative 1 would provide more housing options in the neighborhood and would also contribute towards satisfying the City’s goal of providing sufficient housing opportunities to meet the needs of present and future residents of Everett (see Section 3.7, Housing, for details). 7

Development of a new mixed use, mixed-income community is anticipated to improve the visual character of the site and neighborhood, resulting in positive impacts in the immediate site vicinity (see Section 3.8, Aesthetics, for details). The site would be improved by replacing outdated housing with a redeveloped community that would employ creative urban design and architectural techniques. The redeveloped site would provide enhanced connections to surrounding neighborhoods and additional open space with a large, publicly accessible park in the center of the site. Nearby residents would be in close proximity to potential new job opportunities and commercial amenities on the site. The increased residential population could also provide an increased customer base for businesses in surrounding areas.

**Socioeconomics**

**Construction**

Construction activities under Alternative 1 would result in new temporary construction employment opportunities during the approximately 12-year site buildout. Based on the assumed buildout in 2035, construction would occur on a phased basis over that timeframe. Construction jobs would be discontinued once redevelopment on the site is completed.

**Operation**

Under Alternative 1, the permanent on-site residential population would increase from 0 to approximately 3,645 residents (see Table 3.13-12). This would result in an approximately 60% increase in population Census Tract 402 (from 6,058 residents to 9,703 residents). The additional population, assuming all residents of the site were new to the City, could contribute to meeting nearly 7% of the additional 53,018 residents need to meet the 2035 population target of 164,812 people, or 9% of the additional 39,260 residents need to meet 2035 population capacity of 151,063. 8

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7 Everett 2035 Comprehensive Plan, Chapter 4, Housing, p. 19.
The availability of affordable and mixed-income housing on a site that has not recently contained occupied housing, and a site which formerly contained only low-income housing, could diversify the demographics of the surrounding neighborhood. The introduction of mixed-income housing to a site which formerly contained only low-income housing could also have the effect of economically diversifying the community. However, specific predictions about such changes cannot be provided.

Redevelopment under Alternative 1 would increase employment on the site by providing space for jobs related to retail, civic/service and office uses. Under Alternative 1 approximately 70,600 sq. ft. of non-residential uses would be provided on the site. Overall, development of Alternative 1 could result in approximately 141 jobs on the Park District site by 2035. The number of jobs that could be created is based on a ratio of 500 square foot of building space per employee.\(^9\)

The 141 jobs established on the site under Alternative 1 would contribute towards meeting approximately 0.35% of the additional 40,204 jobs needed to meet the City’s 2035 employment target of 140,000 jobs.

**Alternative 2 – Design Alternative**

Under Alternative 2, proposed redevelopment of the site would feature the same amount of new housing units, and retail, civic/service, and office uses as Alternative 1. However, more buildings (two more) that are less tall (seven stories) would be built onsite than under Alternative 1, resulting in greater site coverage. Less of the site would be in open space and fewer public amenities, including a large, publicly accessible park, would be provided.

Construction and operational environmental justice impacts would be similar to Alternative 1. However, less open space/parks would be provided on the site because more buildings would need to be developed to account for the shorter maximum building heights. This could make the site less appealing overall by providing less outdoor space for residents to use for recreation and enjoyment and reducing the quantity of publicly accessible open space to surrounding neighbors, in comparison to Alternative 1.

Socioeconomic impacts would be similar to Alternative 1 because the same number of housing units and retail, civic/service, and office uses would be provided under Alternative 2. The estimated site population and number of jobs would be the same as Alternative 1.

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\(^9\) The estimate of employees is based on the “commonly accepted assumption” of 1 employee per 500 sq. ft. for commercial uses including retail, civic/service, and office.
Cumulative Impacts

Redevelopment on the Park District site under Alternatives 1 and 2, along with the development of Madrona Square and other recently completed projects in the area, would contribute to the cumulative residential and employment growth in the Delta neighborhood. The increase in on-site population (residents, employees, and visitors) would add to the cumulative increase in activity levels in the area. The increase in residential population could also result in an increased demand for goods and services. It is anticipated that some of this demand could be fulfilled by businesses that would locate in the proposed development, as well as existing businesses near the site in the Delta neighborhood.

It should further be noted that the City of Everett is currently in the process of updating their Comprehensive Plan. In August 2023, the City Council approved three growth alternatives for analysis as part of the update process, including Alternative 1 – Extend Current Plans, Alternative 2 – Concentrated Growth Pattern, and Alternative 3 – Dispersed Growth Pattern. Updates to the Comprehensive Plan could result in the potential for additional development in the vicinity of the Park District site. The City intends to complete the update process in 2024 (see the City of Everett’s website for further details on their Comprehensive Plan Update process). As a result, significant indirect/cumulative impacts to environmental justice and socioeconomic conditions in the area are not anticipated.

Alternative 3 – No Action Alternative

Under Alternative 3, the No Action Alternative, the site would remain in its existing condition. All the existing buildings and landscaping would remain for the time being, but demolition and removal of the buildings will ultimately occur under a separate action. Assumed redevelopment of the site under existing zoning would feature residential uses, no non-residential uses would be included. Approximately 458 housing units which would accommodate approximately 1,113 residents. No non-residential uses would be provided. While more open space would be provided under Alternative 1, minimal public amenities, like a large park would be provided.

Construction environmental justice impacts would be similar to Alternative 1, except that the duration of impacts could be shorter; Alternative 3 could be built out sooner than Alternatives 1 and 2 because fewer units would be built overall. Cleanup of existing environmental health hazards present onsite, including soil pollutants from the former Asarco Smelter, would occur prior to construction, and any potential health hazards present would be stabilized.

Construction activities under Alternative 3 would result in new temporary construction employment opportunities during the site buildout. Because less development would be

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10 Ibid 1.
built overall, less employment opportunities would be provided in comparison to Alternatives 1 and 2.

Operational impacts in terms of air quality and noise would be similar to Alternatives 1 and 2. Transportation impacts would be less than Alternatives 1 and 2 because fewer residential units and subsequently less traffic would occur on and surrounding the site. The site would continue to be devoted primarily to housing uses, and no new employment or retail amenities would be available via the provision of civic, retail and office development. Also, the provision of less open space under the No Action Alternative could make the site less appealing overall by providing less space for residents and neighbors to use for recreation and enjoyment.

Under the No Action Alternative, the permanent on-site residential population would increase from 0 to approximately 1,113 residents. This would result in an approximately 18.3% increase in population in Census Tract 402 (from 6,058 residents to 7,171 residents). Overall, changes would be less than with Alternatives 1 and 2 due to the smaller increase in new residents. Redevelopment under Alternative 3 would not increase permanent employment on the site because no retail, civic/service or office space would be provided.

**Conclusion**

Low-income and minority populations are located in the Park District vicinity that meet EPA’s definition of such a population (i.e., the minority population percentage of the affected area is greater than the minority population percentage in the general population). Existing environmental health hazards are present onsite, including a limited area of contaminated soil from the former Asarco Smelter.

Under all the EIS alternatives, construction activity would result in temporary impacts associated with noise, air quality emissions, etc. These impacts would be similar to other large development projects occurring throughout Everett and would be carried out in compliance with the City of Everett Municipal Code. Prior to construction under the EIS alternatives, study and cleanup of the contaminated soil from the Asarco Smelter would occur and health hazards would be stabilized. Therefore, the potential for disproportionately high or adverse impacts to minorities or low-income persons during construction would be minimal.

Alternatives 1 and 2 would include affordable and mixed-income housing, and parks and recreation uses on the Park District site. No significant environmental justice-related impacts are expected from operation of these uses.

Population, housing, and employment on the site would increase under all the EIS alternatives, with the greatest increases occurring under Alternatives 1 and 2. The increases would contribute towards meeting the City’s population and employment targets, as identified in the 2021 Snohomish County Buildable Lands Report.
3.13.3 Mitigation Measures

Although no significant socioeconomic or environmental justice-related impacts have been identified, the following measures would minimize related impacts. These measures apply to all the alternatives unless otherwise noted. Legally-Required Measures are measures that are required by code, laws or local, state and federal regulations to address significant impacts. Measures Proposed as Part of Project are measures incorporated into the project to reduce significant impacts. Other Possible Measures are additional measures that could be implemented to address impacts but are not necessary to mitigate significant impacts.

Legally-Required Measures

- All construction activities would comply with City of Everett Municipal Code regulations related to air quality and noise.
- A study would be prepared and cleanup of soil contaminants from the Asarco smelter would occur in accordance with Ecology regulations prior to start of construction.

Measures Proposed as Part of Project

- The areas of the site undergoing construction would be secured and non-accessible after hours to prevent the creation of an attractive nuisance that could result in safety/public health impacts to the residential populations near the site.

3.13.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse environmental justice or socioeconomic impacts are expected with the mitigation listed above.