March 10, 2023

Park District Redevelopment
Project EIS

Report & Summary of the EIS Scoping Process

1. Introduction & Background Information

The purpose of this document is to summarize the comments received during the State Environmental Policy Act (SEPA) scoping period for the Park District Redevelopment Project Environmental Impact Statement (EIS), and to establish the EIS alternatives and areas of investigation that will be included in the EIS. This document also briefly describes the proposal and the city’s land use review process. Appendix A provides all the scoping comments received during the scoping period. Additional information, including records of public notice actions and a complete mailing list are available upon request from the City of Everett Community Planning & Economic Development, and other information is available on the City’s website: https://www.everettwa.gov/2941/Everett-Housing-Authority-Park-District.

Proposal & Determination of Significance (DS)

Everett Housing Authority is planning a development to transform its Baker Heights site in North Everett into the Park District, a 15-acre planned development with up to 1,500 mixed-income housing units, new community-centered retail, open spaces, and neighborhood amenities near public transit.

Located in Everett approximately between Pine & Poplar Streets and 12th & 15th Streets, The Park District will replace 244 units of currently vacant wartime housing. EHA is focused on offering new housing at a range of incomes; providing equitable investment into the diverse and underserved Delta neighborhood; and supporting the city’s desire for walkable communities and decarbonization.

There is a separate land use process occurring for demolition of the site, expected to occur in the next 6-12 months.
The City of Everett is the lead agency for SEPA review and is responsible for performing the statutory duties required for the Park District Redevelopment Project. Yorik Stevens-Wajda, Planning Director, Community, Planning, and Economic Development, is the designated Responsible Official for conducting SEPA review.

Based on review of the February 1, 2023, pre-application materials submitted on the proposed Park District Redevelopment Project, the City of Everett determined that this project is likely to have significant adverse impacts on the environment, and that a SEPA EIS should be prepared, consistent with RCW 43.21C.030 (2)(c). The EIS will address the probable significant adverse environmental impacts of the proposed project.

The City of Everett initiated the EIS scoping process for the Park District Redevelopment Project on February 1, 2023, by carrying out the following actions:

- Issued a Notice of Application/ Determination of Significance and Request for Comments on Scope of Environmental Impact Statement (EIS). The DS/Request for Comments gave notice of the 21-day scoping period, ending on February 22, 2023 (the statutory requirement is for a 21-day scoping period). The DS/Request for Comments is available for review at: https://www.everettwa.gov/2941/Everett-Housing-Authority-Park-District-

- Mailed copies of the DS/Request for Comments to federal, state, regional, and local agencies, tribes, adjacent property owners, and other interested parties;

- Published the DS/Request for Comments in the Washington State Department of Ecology’s (Ecology’s) SEPA Register;

- Posted the DS/Request for Comments on the City of Everett website;

- Published the DS/Request for Comments in the Everett Herald newspaper (on February 1, 2023); and,

- Set up a project website with information about the proposal and the SEPA process.

The EIS Scoping notification actions meet or exceed all applicable noticing requirements.
The DS/Request for Comments *preliminarily* identified the following elements of the environment for analysis in the EIS:

- Earth
- Water Resources
- Air Quality/Greenhouse Gas Emissions
- Noise
- Biological Resources
- Land Use/Plans and Policies
- Housing
- Aesthetics/Light and Glare
- Historic/Cultural Resources
- Transportation
- Public Services
- Utilities
- Socioeconomics and Environmental Justice

The DS/Request for Comments *preliminarily* identified the following EIS Alternatives for analysis in the EIS:

- Proposed Action
- Design Alternative
- No Action Alternative

2. **EIS Scoping Process**

Scoping provides notice to agencies, tribes, and the public that an EIS will be prepared for a proposal that is likely to cause a significant impact on the environment. The intent of scoping is to identify public, agency, and tribal comments and concerns on the environmental issues and alternatives that should be addressed in detail in the EIS. The Park District Redevelopment Project EIS scoping process provided opportunities for agencies, tribes, and interested members of the public to submit written comments via conventional mail, email, and a portal on the city’s website. Scoping also offers the possibility for the Lead Agency to determine whether changes to the scope identified in the DS are necessary.

3. **Scoping Comments Received**

This section of the report provides a summary of the comments received during the EIS scoping process. The commenters are listed and their respective comments are contained in Appendix A.

During the EIS scoping period, a total of 9 comment letters/forms were received from 8 unique commenters (one individual provided multiple comment letters). Comments were largely submitted by individuals (8 letters). One (1) letter was from a public agency, the
Washington State Department of Ecology. Of the comment letters, all were received by email or through the city’s website portal.

All comment letters are available for review on the City of Everett’s website portal.

**Comments About Impacts to Elements of the Environment**

Commenters expressed concerns about impacts that the proposal could cause to various elements of the environment.

Following are overviews of the concerns expressed in the comments.

**Impacts to Transportation & Parking**
The project’s impacts on transportation and parking were a concern of commenters. The transportation comments focused on the availability (or lack thereof) of parking in the neighborhood. A concern was that with the addition of the large number of proposed housing units, the problem will get worse.

**Impacts to Land Use**
The compatibility of the density of the proposed new redevelopment project with surrounding and nearby uses, was a concern to commenters.

**Impacts to Critical Areas**
The project’s impacts on critical areas (i.e., the nearby, off-site wetland areas to the west of the site) was a concern to the Department of Ecology. Specifically, Ecology is concerned with how stormwater runoff will be detained and treated during both construction and long-term operations of this development. During construction, there should be temporary erosion and sediment controls installed to prevent turbid water from flowing into this wetland. The development should follow Ecology’s 2019 Stormwater Management Manual for Western Washington to design the detention and treatment of stormwater runoff so it does not change hydrology inputs to this wetland. Low impact development techniques for stormwater detention and treatment are encouraged, where feasible.

**Comments Outside the Scope of SEPA**

**Support for the Proposal**
Several commenter letters expressed support for the proposal during the scoping period. While these comments are acknowledged, expressions of support for or opposition to the proposal do not address environmental issues or provide information to help define the scope of the EIS, which are the focus of the scoping process. Therefore, these comments will not change the scope of the EIS.
Questions or Requests for Additional Information

Several commenter letters contained questions about the proposal and requests for additional information or changes to the proposal. While these comments are acknowledged, questions and requests for additional information do not address environmental issues or provide information to help define the scope of the EIS, which are the focus of the scoping process. Therefore, these comments will not change the scope of the EIS. Questions about the project and requests for additional information should be directed to the City of Everett for a response.

4. Conclusions/Revisions to the EIS Scope

This section of the report contains the city’s conclusions about the scope of the Park District Redevelopment Project EIS. These conclusions are based on consideration of public and agency comments submitted during the scoping process, and the requirements of SEPA.

SEPA Process

The City of Everett used “reasonable methods” to inform the public, tribes, and other agencies that an EIS is being prepared. The city followed the noticing requirements listed in WAC 197-11-510 and the Everett City Code.

The city has expressed its intent and commitment to prepare an EIS that is thorough, complete, and unbiased. The EIS will use existing environmental information to the extent that it is relevant and valid (use of existing environmental information is encouraged by the SEPA rules). Additional and new information and analyses will be prepared in key areas.

The EIS will use and demonstrate the following approach for each element of the environment: (1) summarize existing conditions; (2) identify applicable regulations; (3) analyze the probable significant impacts of the proposal and alternatives; (4) identify appropriate mitigation to address significant impacts; and (5) describe any significant unavoidable adverse impacts.

The technical analyses that will be prepared in support of the EIS will be conducted by the Applicant’s technical team using accepted methodologies and in compliance with applicable regulations. Appropriate city staff, including the Community Planning and Economic Development Department, will review these analyses to ensure that they are prepared in a professional, impartial manner, and are suitable for inclusion in the EIS.

The city anticipates that the Applicant will provide analysis that is sufficient to prepare a project- specific EIS for the proposed project. To the extent that project-level analysis is prepared for the EIS, future environmental review should not be necessary unless there
are substantial changes to the proposal or if determined by additional detailed information (e.g., detailed engineering) in the future. The city will decide whether impacts have been addressed sufficiently in the EIS, or whether and what type of additional review is required by SEPA.

**EIS Alternatives**

The City of Everett has determined that the following alternatives will be analyzed in the EIS – these alternatives represent a reasonable range of alternatives for analysis in the EIS, as defined by the SEPA rules (WAC 197-11-440(5)).

**Alternative 1 – Proposed Action**

The EIS will analyze the proposed *Park District Redevelopment Project* described in Section 1 of this Scoping Summary. Phased development is proposed and would require Planned Development Overlay (PDO), street vacations, and development agreement approval.

**Alternative 2 – Design Alternative**

This alternative will include a modified site design to reduce impacts on some elements of the environment.

**Alternative 3 – No Action Alternative**

The No Action Alternative is required to be included in an EIS and is typically defined as what would most likely happen if the proposal does not move forward. According to the SEPA Rules, “no action” does not necessarily mean that nothing (no redevelopment in this case) would occur. The No Action Alternative studied in this EIS would include discussion of possible future redevelopment of the site in accordance with existing zoning.

**Elements of the Environment**

As indicated previously, the greatest number of comments received during the public EIS scoping period expressed concerns about *Transportation/Parking*. Another comment concerned impacts to *Water Resources* (off-site wetland areas). Other comments raised specific concerns related to *Land Use* (the proposed density of housing units on site). These environmental elements were already identified for study in the EIS.

Based on the scoping comments, no new elements of the have been identified by the city for study in the EIS because the issues raised during scoping were already anticipated to be studied in the EIS.

**Other Elements of the Environment**

The purpose of EIS scoping is to narrow the focus of an EIS to significant environmental issues and to eliminate insignificant impacts from detailed study (WAC 197-11-408). Thus, a SEPA EIS is not required to review every element of the environment listed in WAC 197-
11-444 and the City of Everett SEPA Procedures (ECC 15.02.120)); to evaluate every element at the same level of detail; or to review every concern that may be evaluated by decision-makers in deciding whether to approve a project.

**Conclusion**

In conclusion, the City of Everett has determined the following:

1. The EIS will evaluate three alternatives:
   - **Alternative 1** – Proposed Action,
   - **Alternative 2** – Design Alternative, and
   - **Alternative 3** – No Action Alternative.

2. The EIS will analyze the following elements of the environment:
   - Earth
   - Water Resources
   - Air Quality/Greenhouse Gas Emissions
   - Noise
   - Biological Resources
   - Land Use/Plans and Policies
   - Housing
   - Aesthetics/Light and Glare
   - Historic/Cultural Resources
   - Transportation
   - Public Services
   - Utilities
   - Socioeconomics & Environmental Justice
ATTACHMENT A

Public Scoping Comments
1/26/2023 17:10  Ted Anderson

Hello. I just read the “Park District” Housing article in The Herald, online. Sounds wonderful. However, where are you going to put the 2,200 cars? If we figure, conservatively, 1 ½ cars per housing unit... The article did not mention any solution — and the “map” projection did not show any parking lots. Now, let’s do the math: An extra 4 cars per block, squeezed into surrounding residential areas, spread out over, let’s say, an 8 block width, near the “Park District”: With only 1,500 cars, that would stretch for 46 blocks. 4 cars X 8 = 32. 1,500(only) 1,500 cars) divided by 32 = a 46.87 mile walk home. Certainly I’m not the only person “doing the math”? right? Please ask your “map maker” to go “back to the drawing board”. Thanks, T.H. Anderson, whoneedscomcast@gmail.com

2/1/2023 14:17  Doug Gresham

Jennifer,

I have reviewed the public notice about a Everett Housing Authority development in the Baker Heights neighborhood of Everett. There is a large wetland on Boys and Girls Club property immediately to the west of this development.

I have concerns with how stormwater runoff will be detained and treated during both construction and long-term operations of this development. During construction, there should be temporary erosion and sediment controls installed to prevent turbid water from flowing into this wetland. The development should follow Ecology’s 2019 Stormwater Management Manual For Western Washington in the design for detention and treatment of stormwater runoff so it doesn’t change hydrology inputs to this wetland. I would encourage low impact development techniques for stormwater detention and treatment where feasible.

Doug Gresham, Wetland Specialist
Washington State Department of Ecology
PO Box 330316
Shoreline, WA 98133-9716
Cell: (425) 429-1846
Email: Doug.Gresham@ecy.wa.gov

2/6/2023 13:56  Shaun Whalen

Thank you
I really want to help
With all the vacant buildings in Everett and the surplus of homeless couldn’t some sort of program to make affordable housing and get them off the street be created?
If they stay clean and sober and work the unit is theirs Please let me know if I can help in any way.
February 7, 2023
City of Everett Permit Services
Project Planner, Jennifer Gregerson
3200 Cedar St. 2nd Floor
Everett WA 98201
To the Permit and Planner Team:
I am in support of the development of the Park District in the Baker Heights area of Everett. Currently the area is filled by very old, asbestos filled apartments that need to be torn down. Having a new development would greatly improve the area. The esthetics would be improved with modern design and intriguing buildings of a variety of heights and sizes. The increased housing opportunities in the area would be met so that people of all income levels could share in a new neighborhood. The inclusion of retail and community amenities would improve the area that is currently close to a “food desert”. Plans include gardening areas and playgrounds for children. The grounds would be improved, and any remainder of contaminated soil would be removed. All of this will positively impact the area.
Yes, the project will definitely have an environmental impact on the area. I suggest that this would be a positive impact for those that live there as well as the surrounding area neighborhoods. This kind of improvement is needed to keep up with the housing need and quality of life issues that Everett faces as the population continues to grow.
Sincerely,
Lisa Hall

Hi Jennifer,
I want to leave a comment strongly in favor of the Park District Proposal! In my opinion the middensity housing, tree canopy, mixed use and public space on display serves as a great model for future growth in Everett.
Thanks,
-Jacob
Hello,
I live on Donovan Lane, front of my house is on Poplar. The diagrams of the project are difficult to interpret, especially the lot that is my front yard. I work 3-11 on the 15th, the card I received in the mail does not list a time for the public hearing. I would like a clearer explanation of the city owned parking lot in front of my house. The diagram is too vague.
Thank you,
Nancy Rogerson

Hello,
The diagrams are vague. How am I supposed to comment unless I know what is proposed? There are no color codes to explain what is represented. When I look at the diagram, there’s something within 20 feet of my front door and I would like to know what exactly is being planned for that space. I own the second house in on the corner of Poplar and 12th. It’s one of the Donovan Lane houses that were moved from Rockefeller when Providence was built. I cannot make the zoom on the 16th, I’m an RN and I work 3-11. I would appreciate it if I could get the info I’m looking for.
Thank you,
Nancy Rogerson
Dear Jennifer,
I was in the Zoom meeting tonight and entered several comments. I was reluctant to speak because I was not able to attend the meetings on January 23 and 24 due to having surgery. I don't know what was said there or what the result of those meetings was.

I have two main concerns, density and parking.

I know the EHA is feeling the need to build as many housing units as possible on the available land, but I feel the opposite need! When I moved into the Bakerview apartments 2+ years ago, I found it stressful to be in such a people-dense environment. I live in a studio apartment, and the moment I step out of my door I encounter a lot of people before I can get to my car. This is a great community, but I do not feel sociable every moment of the day. Perhaps you can understand this. Even when working in the gardens here, there is rarely "alone time". Having about 160 residents living on one small block makes constant interactions necessary and not always pleasant.

Parking is a constant issue here. Perhaps when the building became a low income facility they did not expect the residents to have cars? I don't know. But with poor public transportation, anyone who can afford it and can drive, has a car. I have a handicap placard, but there are only 4 handicap spaces and they are not even close to the door. Some very high percentage of the residents here are physically handicapped. The new building construction to the east took away many spaces. Then the city removed 2 more spaces because the city buses had trouble turning the corner at 15th and Baker. Since the parking is so limited, I have to try to get home before 3:30 pm in order to get a space anywhere close to the building. That curtails both my social and volunteer activities. And it is not a great neighborhood for handicapped people to be walking around after dark. These are some of the reasons why I request that EHA include MORE parking spaces than the city requires.

So now you have my concerns over development of The Park District. On the positive side, I will enjoy having the new shopping area, as long as there is parking there too.

I don't envy your job of listening to the wide variety of concerns I expect people are expressing.

Good luck to you.

Hello!

I am reaching out to you again to request that the area behind my home (address listed above) is converted to a community Garden. Having residential units in those locations deprives me from any privacy in my bedroom, bathroom, Kitchen and dining room. Many annoying incidents happened in the past where people were throwing stuff in my back yard or staring at my windows. I really appreciate it if you grant my request in your future planning of the area.

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Ban Al-Kaisi, CCM
Sr. Project Controls Engineer
Sound Transit