



CITY OF EDGEWOOD

PLANNING COMMISSION MEETING AGENDA

Monday, June 8, 2026 – 6:00 PM ♦ City Hall – 10440 Dom Calata Way E ♦ Edgewood, WA

Virtual Meeting Via Zoom <https://zoom.us/j/97065969184>

Zoom Meeting ID: 970 6596 9184

1. CALL TO ORDER

2. PRESENTATION

a. Climate Planning - Measure Meant

3. CONSENT AGENDA: *All matters listed under Item 2, Consent Agenda, are considered routine in nature and will be enacted by one motion. Individual discussion of these items is not planned. A member, however, may remove any item to discuss as an item for separate consideration under New Business.*

a. Review Planning Commission meeting minutes from May 11, 2026

4. CITIZEN COMMENT PERIOD *This portion of the meeting is reserved for the public to comment on items not on the agenda. It is not a back and forth, or an open discussion. If you wish to speak, please raise your hand and wait to be called on. Comments are limited to three minutes.*

5. ACTION ITEMS

a. Electric Alarms Systems, Fencing and Retaining Wall Code Amendments

b. Home Businesses and Licensing

6. DISCUSSION ITEMS

a. 25-002-COMP PLAN – 5628 Sumner Hts Dr E Rezone Request

b. 25-001-COMP PLAN – West Valley Hwy Area Rezone Request

c. Concurrency Code Updates

d. Multifamily Tax Exemptions

7. STAFF UPDATES/BOARD MEMBER COMMENTS

8. ADJOURN

This meeting is accessible to persons with disabilities. For individuals who may require special accommodations, please contact City Hall at (253) 952.3299, 24 hours in advance.



CITY OF EDGEWOOD

PLANNING COMMISSION MEETING AGENDA SUMMARY

Monday, May 11, 2026 – 6:00 PM ♦ City Hall –10440 Dom Calata Way E ♦ Edgewood, WA

1 CALL TO ORDER

Vice Chair Guillory called the meeting to order at 7:00pm

Present: Carly Guillory, Tom Greene, Andrew Hardesty, Leyla Church, Carly Lenoir **Excused:** Chair Overfield

2 PUBLIC HEARINGS

a. Electric Alarm Systems, Fencing and Retaining Wall Code Amendments

The hearing was called to order at 6:02pm and staff presented required updates due to state law HB 1688, clarified definitions, fence height rules, retaining wall limits, and proposed exceptions for livestock fencing. There were no public comments and the hearing was closed at 6:19pm.

b. Home Business and Licensing

The hearing was called to order at 6:19pm and staff explained cleanup of home business code, removal of redundancies, and updates to business license thresholds per state model ordinance. There were no public comments and the hearing was closed at 6:21pm.

3 CITIZEN COMMENT PERIOD

a. Derek Sellers Email

There were no citizen comments; however, staff noted an email received from a citizen regarding a recent notice of application.

4 CONSENT AGENDA:

a. Review Planning Commission meeting minutes from April 13, 2026

Motion: As read **Action:** Approved **Moved by:** Commissioner Lenoir **Seconded by:** Commissioner Hardesty **Motion Passed**

5 DISCUSSION ITEMS

a. Electric Alarm Systems, Fencing and Retaining Wall Code Amendments

Staff proposed adding exceptions for livestock properties (front-yard fencing and 4-ft perimeter fence allowance). Commissioners discussed frontage definitions, livestock fence height, chain-link restrictions, and potential design standards.

b. Home Business and Licensing

No changes since last month; staff reiterated the goal of consolidating and clarifying code. No commissioner concerns; recommendation expected next month.

c. Multifamily Tax Exemption (MFTE's) - Standards and Guidelines

Staff reviewed potential MFTE areas (Town Center and MUR zones with sewer and transit access). Discussed exemption levels (8-, 12-, 20-year), affordable housing requirements, and examples from Puyallup, Tacoma, and Sumner. Explored potential incentives: structured parking, undergrounding utilities, crosswalk improvements, higher density, and added height.

d. Introduction - Concurrency Code Updates

Staff introduced upcoming updates: raising the trip threshold, clarifying “vehicle LOS,” not implementing multimodal concurrency yet, and shifting to biannual reporting.

6 STAFF UPDATES/BOARD MEMBER COMMENTS

- Upcoming interview for a new commissioner
- Public Works Standards and Sewer Code updates presented to Council
- Discussion of shadow platting and community septic exceptions
- Climate Action Team update: tree canopy study, climate impact assessment, hazard identification.

7 ADJOURN

The meeting was adjourned at 7:19pm.



CITY OF EDGEWOOD STAFF REPORT PLANNING COMMISSION AGENDA ITEM

Date: June 8, 2026

Title: Home Businesses & Licensing Regulations

Attachments: Attachment A – DRAFT Recommendation to City Council
Attachment B – DRAFT Redline Code Amendments

Submitted By: Jeremy Metzler, PE – Community Development Director

Background Information:

EMC 18.100.070 (Home Business) and EMC 18.100.080 (Limited Home Business) establish regulations for home-based businesses within the City of Edgewood. These rules were primarily enacted in 2003 and last significantly updated in 2015. The City has only made minor edits since 2015 to address conflicts with other sections of the municipal code. Staff and the Economic Development Advisory Board (EDAB) have recently flagged these regulations as being repetitive and convoluted, which can be a significant deterrent to home-based businesses.

In December 2024, following several years of review with the Planning Commission (PC) and EDAB, the City Council adopted the 2024 Comprehensive Plan Periodic Update. This update included the following home-based business goals:

- **ED.3a:** Provide support for existing small businesses, home-base businesses, and entrepreneurs with initiatives such as facilitating regular meetings for home-based businesses, maintaining and circulating a list of local small businesses, and providing education and resources.
- **ED.3b:** Encourage home-based businesses that do not impact the residential character of the neighborhood. Limit signs, parking and truck deliveries, and other potential adverse impacts and consider an amnesty program for existing unlicensed or unregistered home-based businesses.

Finally, the Department of Revenue (DOR) and Association of Washington Cities (AWC) have both flagged Edgewood's business licensing regulations for an update to comply with recent changes in state law. In short, EMC 5.05 must include indexing language before the state's minimum threshold exceeds \$5,000. Staff does not expect this to occur for several years, but rather than wait and possibly forget, it may be appropriate to update that section of code now while it is fresh in our minds.

This topic has been discussed with the Planning Commission (PC) for the last few meetings, and links to prior meeting materials are provided here for reference:

- March 9, 2026 – [Meeting Materials](#) and [Recording](#)
- April 13, 2026 - [Meeting Materials](#) and [Recording](#)
- May 11, 2026 – [Meeting Materials](#) and [Recording](#)

Resources:

- [EMC 5.05](#) General Business License Code
- [EMC 18.100.070](#) Home Business Code
- [EMC 18.100.080](#) Limited Home Business Code

Tentative Schedule:

March 9, 2026 – Planning Commission Introduction (COMPLETE)

April 13, 2026 – Planning Commission Discussion (COMPLETE)

April 24, 2026 – SEPA Issuance and Comment Period (COMPLETE)

May 11, 2026 – Planning Commission Public Hearing (COMPLETE)

June 8, 2026 – Planning Commission Recommendation

July 7, 2026 – City Council Study Session Introduction

July 14, 2026 – City Council Regular Meeting and Potential Action

Current Discussion:

Following last month's public hearing and discussion, where no comments were provided, staff has coordinated review with legal counsel and finalized the attached draft amendments for final review and consideration by the Planning Commission.

Analysis:

Per EMC 18.60.020, the Planning Commission has the authority to review and make recommendations on proposed amendments to city regulations concerning land use and development. Staff have reviewed the criteria under EMC 18.60.220(A) and offers the following analysis:

1. Whether the proposed amendment(s) conform to the Growth Management Act (Chapter [36.70A](#) RCW). **Response:** The proposed amendments conform with the Growth Management Act requirements for home businesses.
2. Whether the proposed amendment(s) are consistent with and implement the city's comprehensive plan, including the goals, policies and implementation strategies of the various elements of the plan. **Response:** The proposed amendments are consistent with and implement the city's comprehensive plan goals and policies.
3. Whether circumstances related to the proposed amendment(s) and/or the area in which it is located have substantially changed since the adoption of the city's comprehensive plan. **Response:** The proposed amendments address existing gaps and deficiencies, simplifying and clarifying existing regulations, consistent with the 2024 Comprehensive Plan's Goals and Policies.
4. Whether the assumptions upon which the city's comprehensive plan is based are no longer valid, or whether new information is available which was not considered during the adoption process or any annual amendments of the city's comprehensive plan. **Response:** The

proposed amendments address existing gaps and deficiencies, simplifying and clarifying existing regulations, consistent with the 2024 Comprehensive Plan's Goals and Policies.

5. Whether the proposed amendment(s) reflects current, widely held values of the residents of the city. Response: The proposed amendments reflect the current and widely held values of the residents of the city.

Staff Recommendation:

Following any further discussion on the matter, the Planning Commission is invited to make a formal recommendation to the City Council on adoption of the proposed draft amendments to EMC Titles 5 and 18 regarding home businesses and licensing regulations. A draft recommendation has been prepared by staff, attached herein for consideration.



CITY OF EDGEWOOD
PLANNING COMMISSION
RECOMMENDATION

The Planning Commission voted X-X to recommend that the City Council adopt the proposed draft amendments to EMC Titles 5 and 18 regarding home businesses and licensing regulations, as attached hereto.

RECOMMENDED BY THE CITY OF EDGEWOOD PLANNING COMMISSION
ON THE 8TH DAY OF JUNE 2026.

JoAnn Overfield
Planning Commission Chair

Attest by:

Josh Kubitza, AICP
Planning Manager

Chapter 5.05

GENERAL BUSINESS LICENSE CODE

5.05.010 Title.

This chapter shall be known, cited, and referenced as the "General Business License Code."

5.05.020 Definitions.

A. Unless the context clearly requires otherwise, the definitions in this section apply throughout this chapter. Any word or phrase not contained herein shall be first referenced to Chapter 18.20 EMC for meaning.

1. For any word or term not defined herein, the latest edition of Webster's Dictionary shall be used.

2. The director or their designee has the final authority to determine the interpretation or usage of terms used in this chapter.

B. Additional definitions not contained in Chapter 18.20 EMC that apply to this title are:

1. "Business" means all activities, occupations, pursuits or professions engaged in the city of Edgewood (as the term "engage in" is defined below).

2. "City clerk" means the city clerk for the city or their designee.

3. Engage In or Engaging In. The city expressly intends that this definition includes any activity sufficient to establish nexus for the purpose of applying the business license fee under the law and constitutions of the United States and the state of Washington. Nexus is presumed to continue as long as the taxpayer benefits from the activity that constituted the original nexus-generating contact or subsequent contacts. This definition is satisfied through any of the activities described in subsections (3)(a) through (e) of this section.

a. Commencing, conducting or continuing in business, and also the exercise of corporate or franchise powers, as well as liquidating a business when the liquidators thereof hold themselves out to the public as conducting such business.

b. This subsection sets forth examples of activities that constitute engaging in business in the city and establishes safe harbors for certain of those activities so that a person who meets the criteria may engage in de minimis business activities in the city without having to pay a business license fee. The activities listed in this section are illustrative only and are not intended to narrow the definition of "engaging in business" in subsection (B)(3)(a). If an activity is not listed whether it constitutes "engaging in business" in the city shall be determined by considering all the facts and circumstances and applicable law.

c. Without being all-inclusive, any one of the following activities conducted within the city by a person, or its employee, agent, representative, independent contractor, broker or another acting on its behalf, constitutes engaging in business and requires a person to register and obtain a business license:

i. Owning, renting, leasing, maintaining, or having the right to use, or using, tangible personal property, intangible personal property or real property permanently or temporarily located in the city.

ii. Owning, renting, leasing, using or maintaining an office, place of business, or other establishment in the city.

iii. Soliciting sales.

iv. Making repairs or providing maintenance or service to real or tangible personal property, including warranty work and property maintenance.

- v. Providing technical assistance or service, including quality control, product inspections, warranty work, or similar services on or in connection with tangible personal property sold by the person or on its behalf.
- vi. Installing, constructing or supervising installation or construction of real or tangible personal property.
- vii. Soliciting, negotiating, or approving franchises, licenses or other similar agreements.
- viii. Collecting current or delinquent accounts.
- ix. Picking up and transporting tangible personal property, solid waste, construction debris or excavated materials.
- x. Providing disinfecting and pest control services, employment and labor pool services, home nursing care, janitorial services, appraising, landscape architectural services, security system services, surveying and real estate services, including the listing of homes and managing real property.
- xi. Rendering professional services such as those provided by accountants, architects, attorneys, auctioneers, consultants, engineers, professional athletes, barbers, baseball clubs and other sports organizations, chemists, psychologists, court reporters, dentists, doctors, detectives, laboratory operators, teachers, or veterinarians.
- xii. Meeting with customers or potential customers, even when no sales or orders are solicited at the meetings.
- xiii. Training or recruiting agents, representatives, independent contractors, brokers or others domiciled or operating on a job in the city, acting on its behalf, or for customers or potential customers.
- xiv. Investigating, resolving, or otherwise assisting in resolving customer complaints.
- xv. In-store stocking or manipulating products or goods, sold to and owned by a customer, regardless of where sale and delivery of the goods took place.
- xvi. Delivering goods in vehicles owned, rented, leased, used or maintained by the person or another acting on its behalf.
- d. If a person, or its employee, agent, representative, independent contractor, broker, or another person acting on the person's behalf, engages in no other activities in or with the city but the following, it need not register and obtain a business license:
- i. Meeting with suppliers of goods and services as a customer.
- ii. Meeting with government representatives in their official capacity, other than those performing contracting or purchasing functions.
- iii. Attending meetings, such as board meetings, retreats, seminars and conferences, or other meetings wherein the person does not provide training in connection with tangible personal property sold by the person or on its behalf. This provision does not apply to any board of directors member or attendee engaging in business, such as a member of a board of directors who attends a board meeting.
- iv. Renting tangible or intangible property as a customer when the property is not used in the city.
- v. Attending, but not participating in, a "trade show" or "multiple vendor events." Persons participating at a trade show shall review the city's trade show or multiple vendor event ordinances.

- vi. Conducting advertising through the mail.
- vii. Soliciting sales by phone from a location outside the city.
- e. A seller located outside the city merely delivering goods into the city by means of a common carrier is not required to register and obtain a business license; provided, that it engages in no other business activities in the city. Such activities do not include those in subsection (B)(4) of this section.
4. "Licensee" means any business or business enterprise that applies for or is granted a business license. The term "licensee" shall also mean the person who submits a business license for approval, the owner or operator of a business or business enterprise, and any corporation, partnership, nonprofit or organization which owns or operates the business or business enterprise.
5. "Business Licensing Service" and "BLS" mean the office within the Washington State Department of Revenue providing business licensing services to the city of Edgewood.
- 5.05.030 Administration and enforcement.**
- A. The city clerk shall have general charge of, and supervision over, the administration and enforcement of this chapter.
- B. The city clerk may call upon other city departments to aid in the enforcement of this chapter.
- C. The licensee shall, upon reasonable request, provide or allow the city clerk to inspect relevant documentation for verification of the information provided by the licensee on the business license application.
- 5.05.040 General business license required – Exemption.**
- A. Unless exempt per subsection B below, ~~it~~ is unlawful for anyone to engage in business in the city without having first obtained a general business license for the current calendar year or unexpired portion thereof and paid the fees prescribed in this chapter.
- B. To the extent set forth in this section, ~~the following~~ persons and businesses whose annual value of products, gross proceeds of sales, or gross income of the business conducted within the city is equal to or less than the threshold listed in the city of Edgewood fee schedule adopted pursuant to EMC 3.35.020 shall be exempt from the registration, license, and license fee requirements. This exemption does not apply to regulatory license requirements, activities that require a specialized permit, or other occupancy requirements of the city. Said exemption threshold shall be at least \$5,000 or the amount determined as outlined below if higher:
1. Beginning January 1, 2026, this threshold amount will be adjusted every four-years (forty-eight months) on January 1, by an amount equal to the increase in the Consumer Price Index ("CPI") for "West Urban, All Urban Consumers" (CPI-U) for each 12-month period ending on June 30 as published by the United States Department of Labor Bureau of Labor Statistics or successor agency. The first such adjustment calculation will occur on January 1, 2030, with subsequent calculations occurring every four years thereafter. To calculate this adjustment, an initial value of \$4,000 will be multiplied by one plus the cumulative four-year (forty-eight month) CPI increase using each 12-month period ending on June 30 of each prior year, and rounded to the nearest \$100. However, if any of the annual CPI increases are more than five (5) percent, a five (5) percent increase will be used in computing the annual basis and if any of the annual CPI decreased during the forty-eight-month period, a zero (0) percent increase will be used in computing the annual basis. ~~Any person or business whose annual value of products, gross proceeds of sales, or gross income of the business in the city is equal to or less than \$5,000 and who does not maintain a place of business within the city shall be exempt from the general business license requirements in this chapter.~~
2. ~~The exemption does not apply to regulatory license requirements, activities that require a specialized permit, or occupancy requirements required by the city.~~

5.05.050 Separate business license required.

A. A separate license shall be obtained for each physical location of a business enterprise within the city and each license shall authorize the licensee to carry on, pursue or conduct business only at the physical location of the enterprise as stated on the license.

B. A separate license shall not be required for a facility determined by the city clerk to be an accessory facility to a business for which a license is issued.

C. When the licensee wishes to change the location of their business within the city, the licensee shall notify the BLS sufficiently in advance of the intended move to allow BLS to notify the city clerk, and any other regulatory agencies with an interest in the business, and providing enough time for the clerk and other agencies to review the intended new location. Business shall not commence at the new location until approved. If the move is approved, a new license will be issued for the new place of business, as long as no grounds exist for denial or revocation of the license, as set forth in EMC 5.05.130. A change of location may require submitting a zoning change of use for the new location.

5.05.060 License not transferable.

A. No license issued under the provisions of this chapter shall be transferred or assigned.

B. In the event that the ownership of a business changes, the acquiring person shall obtain their own license for the business as provided for in this chapter before commencing business activities under the acquired business.

5.05.070 License posting.

All licenses issued pursuant to this chapter shall be posted in a conspicuous place at the business location for which it was issued.

5.05.080 Disclaimer of city liability.

A. Issuance of a license pursuant to this chapter does not constitute the creation of any duty by the city to indemnify the licensee for any wrongful acts against the public or any individual, or to guarantee the quality of goods, services, or expertise of a licensee.

B. The issuance of a license does not shift responsibility from the licensee to the city for proper training, conduct, or equipment of the licensee or his/her agents, employees or representatives.

5.05.090 Application procedure – License fee.

A. Application for the general business license provided for in this chapter is made by filing a business license application with BLS. The application shall include all information required for each license requested, all fees due for all licenses and any fee set forth in the city of Edgewood fee schedule, as well as the application handling fee required by RCW 19.02.075 and any other fees required by this code

B. The BLS shall provide all necessary information to the city clerk for review. The city clerk shall determine whether to approve issuance of the license through the BLS which will then produce the license document. If the determination is made to deny the application, the city shall provide the decision to the applicant in writing. An applicant who is denied may pursue an appeal as provided for in EMC 5.05.130 through 5.05.180.

5.05.100 License does not indicate legality of business.

A. The issuance of a license pursuant to this chapter shall not be evidence of the legality of a business or indicate that the business is conducted in conformity with any laws or regulations of the city, the state of Washington or the United States.

B. The issuance of a business license shall not prevent the city, the state of Washington or the United States from taking any action relating to the conduct of the business or the licensee, including, but not limited to, action to revoke the license or deny an application for a future license, an action to cause the cessation of the business, or any enforcement action described in this chapter.

5.05.110 License renewal – Late penalties.

A. The business license issued through the provisions of this chapter shall expire on the date established by the BLS and must be renewed on or before that date to lawfully continue to engage in business within the city.

B. Application for renewal of the license is made through the BLS and shall include all information required for renewal of all licenses involved, the total fee for all licenses, as well as the renewal application handling fee required by RCW 19.02.075.

C. The license expiration date and respective city license fee amount may be prorated as necessary in order to synchronize the license expiration with the expiration date of the business license account maintained by the BLS.

D. Failure to complete the business license renewal by the expiration date shall incur the late renewal penalty required by RCW 19.02.085 in addition to all other fees due.

E. Failure to complete the license renewal within 120 days after expiration shall result in the cancellation of the license and shall require submitting a new application for a business license in order to lawfully engage in business within the city. The city may require payment of all past due amounts prior to approving the new business license.

F. The city may impose additional penalties in addition to those referenced in this section, as provided for in EMC 5.05.190.

5.05.120 Overpayment or refund of license fee.

Whenever a business makes an overpayment, and within two years after the date of such overpayment makes an application for a refund or credit for the overpayment, the claim shall be considered by the city clerk and, if approved, shall be repaid by the city.

5.05.130 Grounds for denial or revocation of license.

A. In addition to other actions or penalties provided by law, the city may deny or revoke any license applied for or issued pursuant to this chapter for any of the following reasons:

1. The license application contains an omission or misrepresentation of material fact.
2. The license was procured by fraud.
3. The license is used or is intended to be used for a business materially different from that applied for.
4. The licensee or business fails to pay the licensing fee applicable to such license.
5. The licensee or business violates any of the requirements of this chapter.
6. The business engages in, or the licensee seeks a license to engage in, an unlawful business or activity.
7. The business operates in a manner that constitutes a nuisance pursuant to common law or the ordinances and codes of the city of Edgewood or the statutes of the state of Washington.
8. The licensee is not 18 years of age or older at the time the license is applied for.
9. The licensee or the business has had a similar license denied or revoked and has not corrected the basis for the denial or revocation.

B. The issuance of a license that could have been denied pursuant to subsection (A) of this section shall not prohibit the city from taking action to revoke the license at a later date, and it shall at all times remain the exclusive responsibility of the licensee to ensure that the business complies with the requirements of this chapter.

5.05.140 Denial or revocation of license – Notice and opportunity to be heard.

In accordance with EMC 5.05.150 through 5.05.180, a licensee shall have an opportunity to be heard subsequent to the denial of a business license, or prior to the revocation of an existing license.

5.05.150 Notice of license denial or revocation and scheduling of hearing.

A. Denial of License. Any action to deny a license applied for or issued shall be commenced by the city clerk's notice of the denial. A notice issued under this subsection shall substantially comply with the following:

1. The notice shall be delivered, by first class mail or by personal service, to the business license applicant or the holder of the business license as set forth in the most recent business license application.
2. The notice shall describe the basis for the denial.
3. The notice shall describe the corrective action, if any, that may be taken to eliminate the basis for denial.
4. The notice shall specify the deadline for the applicant to submit an appeal to the hearing examiner in order to request an appeal hearing to contest the denial. If an appeal is filed, the appeal hearing shall be scheduled not less than 14 but not more than 60 days after the date the notice is delivered in accordance with this subsection (A).
5. The notice shall provide that if the licensee fails to appear on the date specified in the notice, the appeal of the denial is waived.

B. Revocation of License. Any action to revoke an issued license shall be commenced by a notice of the revocation. A notice issued under this subsection shall substantially comply with the following:

1. The notice shall be delivered, by first class mail or personal service, to the holder of the business license as set forth in the most recent business license application or business license issued.
2. The notice shall describe the basis for the revocation.
3. The notice shall describe the corrective action, if any, that may be taken to eliminate the basis for the revocation.
4. The notice shall specify the deadline for the applicant to submit an appeal to the hearing examiner, in order to request an appeal hearing to contest the revocation. If an appeal is filed, the appeal hearing shall be scheduled not less than 14 but not more than 60 days after the date the notice is delivered in accordance with subsection (A) of this section.
5. The notice shall provide that if the holder of the business license fails to appear on the date specified in the notice, default judgment shall be entered and the license shall be revoked on the failure to appear.

C. Operation during Appeal. When a license application has been denied or revoked and during the pendency of any appeal on the denial or revocation, the applicant/licensee shall not engage in the business for which the license was denied or revoked unless or until the license issues pursuant to the hearing examiner's order or court judgment.

5.05.160 Hearing to deny or revoke business license.

A. Parties to Hearing. The parties to a hearing provided pursuant to this chapter shall be the city and the licensee (and/or legal counsel for the two parties).

B. Date for Hearing. Hearings shall be scheduled to occur no less than 14 but not more than 60 days after the date the notice of denial or revocation is delivered in accordance with EMC 5.05.150; provided, that additional hearings may be held after 60 days as determined by the hearing examiner. The hearing examiner shall have discretion to grant continuances and reschedule hearings in the interest of the parties and justice.

C. Prehearing Conferences. The hearing examiner may, in the examiner's discretion or at the request of either party, hold a prehearing conference to schedule additional hearings, order discovery, and to make other appropriate pretrial determinations. A prehearing conference may be held by telephone.

D. Hearing Process. The parties to the hearing, or legal counsel for the parties, may call witnesses and present evidence and rebuttal evidence subject to the following:

1. The city shall have the burden of proving, by a preponderance of the evidence, that there are sufficient grounds for the denial or revocation of the license pursuant to EMC 5.05.130. Violations subject to civil infraction or criminal penalties shall be enforced in Pierce County District Court (PCDC). (See EMC 5.05.190.)

2. The parties shall be responsible for securing the appearance of any witnesses they may call. Neither the city nor the hearing examiner shall have the burden of securing any witnesses on behalf of the licensee.

3. Formal rules of evidence shall not apply. The hearing examiner may allow hearsay evidence and may permit the admission of evidence without proof of the chain of custody of evidence. Notes, reports, summaries, notices, photographs, or other materials prepared by the parties may be admitted into evidence if requested, without satisfaction of formal rules of evidence. Notwithstanding the admission of evidence, the hearing examiner shall determine the proper weight to be assigned to any evidence admitted.

E. Default Judgment. If the licensee fails to appear on the hearing date specified in the notice or at any other hearing set by the hearing examiner, the right to a hearing shall be forfeit and default judgment shall be entered and the license shall be denied or revoked.

5.05.170 Authority of hearing examiner – Order – Appeal.

A. Authority. The hearing examiner shall have the authority to determine whether or not there are sufficient grounds for the denial or revocation of the business license, pursuant to EMC 5.05.130.

B. Order. The hearing examiner shall issue a written order that sets forth a procedural summary of the hearing, his or her findings of fact and conclusions of law, and his or her determination. In the event of a default judgment, the written order shall set forth whether notice was properly issued, the facts regarding the failure of the licensee to appear, and a determination of default in the event notice was proper. The written order shall be delivered to the parties by first class mail, deposited in the mail no more than 21 days following the conclusion of the hearing. The order of the hearing examiner shall become effective on the third day following placement of the order in the mail.

C. Appeal. An appeal of the order of the hearing examiner must be filed with the superior court within 21 days of the effective date of the order.

5.05.180 Corrective action prior to hearing.

In the event the licensee takes corrective action and the grounds for the denial or revocation are abated, and such corrective action and abatement occurs prior to the date set for hearing, the hearing shall be canceled, and the license shall be issued or reissued.

5.05.190 Violations and enforcement – Penalties.

A. Any violation of any provision of this chapter may be enforced as provided in this section.

B. Each separate date, or portion thereof, during which any violation occurs shall constitute a separate violation.

C. Enforcement.

1. Civil Infraction. Any person who violates this chapter is subject to issuance of a Class 1 civil infraction as set forth in RCW 7.80.120(1)(a), filed in PCDC and processed in the same manner as other infractions. If a person cited for failure to obtain a business license appears before the PCDC and provides written evidence that he or she obtained a business license prior to adjudication of the infraction, the monetary penalty shall be reduced to \$100.00 and the court may assess court administrative costs of \$25.00. The court administrative costs shall be in lieu of the statutory assessments referenced in RCW 7.80.120.

2. Criminal Violation. A person who knowingly violates a provision of this chapter, or commits a repeat violation of this chapter, is guilty of a misdemeanor, punishable by up to the maximum penalty established in RCW 9A.20.021(3). For purposes of this section, "repeat violation" means either a prior committed finding by the PCDC of an infraction issued under this chapter, or a committed finding by the hearing examiner of a violation of this chapter by the same business, licensee or person within a five-year period.

1 3. Injunction. In addition to or as an alternative to any other enforcement or penalty provided for in this chapter,
2 and because a violation constitutes an actual injury to the community, the city may seek injunctive relief or
3 other equitable relief to prevent any activity in violation of this chapter.

4 4. Collections. Any license fees or penalties due and unpaid under this chapter, and all costs and expenses,
5 constitute a debt to the city and may be collected by referral to a collection agency in accordance with Chapter
6 3.55 EMC and RCW 19.16.500 or court proceedings the same as any other debit in like amount which is in
7 addition to all other existing remedies. In any such action, the prevailing party shall be entitled to recover its
8 reasonably incurred costs, expenses, and fees, including attorneys' fees.

Chapter 18.100

DEVELOPMENT STANDARDS – USE SPECIFIC

...

18.100.070 Home businesses

A. Purpose. The purpose of this section is to provide standards which allow residents to operate businesses or conduct commercial activity from their principal residence or from a permitted accessory structure while achieving the goals of retaining the residential character of the dwelling and the neighborhood.

BA. Applicability – Home business permit required. Unless the proposed business or commercial activity is exempt per subsection C or complies with the limited activity restrictions under subsection E.2, Home businesses are limited to an accessory use in conjunction with a residential detached dwelling use type. Obtaining a home business permit is required ~~in addition to the general business license required by Chapter 5.05 EMC.~~ The home business permit is subject to the regulations of this section, reviewed under the Type 1 permit process as provided in EMC 18.50.050, and administered through the community development department ~~city clerk's office.~~

CB. Exemptions. The following uses are exempt from the regulations of this section:

1. Any non-residential use in a permitted accessory structure that is otherwise permissible in the zoning district under EMC 18.70.050. This exemption does not apply to non-residential uses within any residential dwelling unit. ~~Child daycare services, home-based (624410, part), except a home business permit is still required to ensure compliance with EMC 18.100.040.~~

2. Accommodation (NAICS Sector 721) – bed-and-breakfast inns (NAICS 721191).

3. Garage sales, yard sales, bake sales, temporary home bazaars for hand-crafted items or parties for the display of clothing, gifts and household products, and other similar uses shall not be subject to regulation pursuant to this section; provided, that:

a. Any such use shall not be in existence for more than four times in any one calendar year, and is not in violation of any other section of the title or other city ordinances; and

b. Any such garage sales and yard sales involve only the sale of household goods, none of which were purchased for the purpose of resale.

4. For the profit sale of produce or other food products is limited to the temporary seasonal sale of produce grown on the premises.

5. Hobbies which do not result in payment to those engaged in such activity.

DC. Prohibited Activities. No business or commercial activity shall be allowed on property that a person owns, occupies, or is in lawful control of, within residential dwellings or structures accessory thereto, contrary to the provisions of this section. The following on-site activities are prohibited as home businesses:

1. Repair, bodywork, painting, washing, detailing, or storage of ~~No home business or business use on residential property that a person owns, occupies or is in lawful control of, contrary to the provisions of this section.~~

~~2. The following on-site activities are prohibited as home businesses:~~

~~a. Motor vehicles, commercial trucks and/or other heavy equipment repair.~~

~~b. Motor vehicle, commercial truck and heavy equipment bodywork.~~

~~e. Motor vehicle, commercial truck and heavy equipment painting.~~

~~d. Motor vehicle, commercial truck and heavy equipment wash and/or detailing services.~~

~~e. Storage of motor vehicles, commercial trucks or heavy equipment.~~

~~f.2.~~ Storage of used parts of vehicles and/or used machinery in inoperable condition.

~~g.3.~~ Storage of building materials such as lumber, plasterboard, pipe, paint or other construction materials unless being used to construct a specific structure on the premises, pursuant to a current city building permit.

ED. Performance Standards. The following performance standards prescribe the parameters under which one or more home business activities may be conducted on private property when incidental to a residential use. Said activities that exceed these performance standards are subject to the use standards under Chapter 18.70 EMC, Permitted Land Uses, ~~to determine the appropriate civic, commercial, or industrial use category that applies to the activity.~~

1. The following standards apply to all home business activities within the city of Edgewood:

~~a. A home business permit shall be obtained directly through the city clerk's office for each home business and any property on which a home business is undertaken.~~

a. ~~b.~~ All home business activities are subject to the general business license requirements under ~~A city business registration shall be obtained and maintained for each home business as described in~~ Chapter 5.05 EMC.

~~e. The home business shall be clearly incidental and secondary to the use of the property as residential purposes and shall not change the residential character of the dwelling or neighborhood.~~

b. The activities must be operated by a resident of the property on which the activity is located, with no more than one non-resident employee on site at any given time. If there is a non-resident employee, the site must have one parking space in addition to any parking required for the dwelling on the same parcel of land.

c. The activities shall be accessory to residential detached dwelling and middle housing use types, limited to 40 percent of the gross floor area of the residence, including garages and unfinished basements, and accessory buildings, with proof of owner authorization if the applicant is not the property owner.

d. The activities shall not change the residential character of the dwelling and/or neighborhood, being conducted completely within the dwelling or other permitted accessory structure(s), including the storage of all materials, parts, tools and other equipment used in the activity, except for the growing or storing of plants that may be used by the activity.

e. The activities must not utilize more than two vehicles and utility trailers with a gross vehicle weight rating (GVWR) of more than 10,000 pounds per truck/trailer combination. If there are vehicles and utility trailers, parking must be provided for on the subject property.

~~f.~~ d. There shall be no more than three deliveries per week to the residence by suppliers for the business activities.

g. ~~e.~~ Traffic generated by ~~a home the~~ business activities shall not exceed 16 round trips per day per property ~~associated with the home business~~, including deliveries and client-related trips.

h. ~~f.~~ Utility demand for sewer, water, electricity, garbage or natural gas shall not exceed normal residential levels, as determined by the utility purveyor.

1 ig. The activity shall not interfere with other existing and/or permitted uses on nearby land, including but
2 not limited to Equipment or operation processes ~~shall not be utilized~~ which would produce or cause the
3 emission of gases, dust, odors, vibration, electrical interference, smoke, noise, or light in a manner likely to
4 cause offense or irritation to neighboring residents.

5 jh. The home business(es) shall not use electrical or mechanical equipment that results in:

6 i. A change to the fire rating of the structure(s) used for the home business(es);

7 ii. Visual or audible interference in radio or television receivers, or electronic equipment located off
8 premises; or

9 iii. Fluctuations in line voltage at or beyond the property line.

10 ki. The activity must comply with all applicable building, land use, and fire code requirements for permits,
11 occupancy, and inspection, including any use of hazardous materials or equipment. There shall be no
12 storage, distribution and/or production of toxic or flammable materials, nor spray painting or spray
13 finishing operations that involve toxic or flammable materials, which in the judgment of the fire code
14 official pose a dangerous risk to the residence, its occupants, and/or surrounding properties. An applicant
15 shall make available the material safety data sheets, listing all potentially toxic and/or flammable materials
16 associated with the home business, to the fire code official if requested for review.

17 l. Manufacturing activities shall be limited to small-scale assembly of already manufactured parts, but this
18 shall not preclude production of small, individually hand-crafted items, furniture or other wood items as
19 long as the activity meets the other standards of this section.

20 m. Customers, clients, and/or patrons of the activity shall be prohibited from the premises prior to 8:00 a.m.
21 and after 8:00 p.m. on Mondays through Fridays, and prior to 9:00 a.m. and after 5:00 p.m. on weekends
22 and holidays observed by the city.

23 n. All signs for the activity must meet the requirements of Chapter 18.97 EMC, Sign Code.

24 2. Home-based child daycare services (NAICS 624410, part) that are compliant with the standards under EMC
25 18.100.040 are exempt from the performance standards listed under subsection 1, above.

26 3. Proposed business activities that comply with subsection 1, above, and the following additional standards
27 shall be considered limited home businesses and are exempt from the home business permit required under this
28 section:

29 a. The structure shall not be modified to establish or operate the proposed business activity that would
30 cause it to resemble anything other than a residential dwelling or accessory structure. This means there
31 shall not be any separate entrance(s) for the activity from the outside of the structure, mechanical
32 equipment that would not be used normally for domestic or household purposes, and/or be any evidence
33 that a business is being conducted from the premises.

34 b. There shall be no exterior signage that identifies the property as a business location.

35 c. Other than residents of the dwelling, there shall be no non-resident employees, volunteers, or other
36 persons engaged in the business activities on the site.

37 d. Any sales, either retail or wholesale, shall be limited to remote means (mail order, telephone, electronic,
38 etc.) with off-site delivery.

39 e. Any service(s) offered to patrons shall be pre-arranged by appointment (no walk-ins), with no more than
40 one patron on-site at any time, or provided off-site.

f. Activities are further limited to no more than 25 percent of the floor area of the dwelling. Areas within attached garages, unfinished basements and storage buildings shall not be considered floor area for purposes of calculating this allowable limited home business activity area, but these features may be used for storage of goods associated with the limited home business.

~~E. One or more home business may be conducted in a residential detached dwelling use type as an accessory use, except as prohibited in subsection C of this section, Prohibited Activities; provided, that the home business shall:~~

~~1. Be operated by a resident of the property on which the business is located.~~

~~2. Employ no more than one full or part time person, other than residents of the dwelling.~~

~~3. Be operated within the dwelling or other accessory buildings normally associated with uses permitted in the zone in which the property is located.~~

~~4. Not interfere with existing uses on nearby land or with other uses permitted in the zone in which the property is located.~~

~~5. Comply with all conditions imposed pursuant to this section.~~

~~6. Have one parking space per employee provided on the same parcel of land, in addition to that parking required for the dwelling.~~

~~7. Not utilize more than two vehicles and utility trailers, with a gross vehicle and trailer weight of more than 10,000 pounds, in the operation of the home business. Parking for said vehicles and/or trailers shall be provided on the subject property.~~

~~8. Store all materials, parts, tools and other equipment used in the operation of the home business entirely within the dwelling or accessory building.~~

~~9. Comply with building, land use and fire code requirements for permits, occupancy, and inspection, including use of hazardous materials or equipment.~~

~~10. Limit manufacturing to the small scale assembly of already manufactured parts but shall not preclude production of small, individually hand-crafted items, furniture or other wood items as long as the activity meets the other standards of this section.~~

~~11. Prohibit customers or clients on the premises prior to 8:00 a.m. and after 8:00 p.m. on Mondays through Fridays, and prior to 9:00 a.m. and after 5:00 p.m. on weekends and state or federal holidays.~~

~~12. Limit the home business activity to 40 percent of the gross floor area of the residence, including garages and unfinished basements, and accessory buildings; or 2,000 square feet, whichever is less.~~

~~13. Meet the signage requirements of Chapter 18.97 EMC, Sign Code.~~

~~14. Each business must meet the requirement of Chapter 5.05 EMC, Business Licenses and Regulations.~~

F. Home business permit – decision criteria. The decision to approve, approve with conditions, or deny an application for a home business permit shall be made by the community development director or designee upon findings of whether or not the ~~pur~~proposed home business activity is or will be:

1. In compliance with the standards contained in this section;

~~2. Subordinate to the residential use of the property; and~~

~~23.~~ 23. Undertaken in a manner that is not detrimental or disruptive in terms of appearance or operation to neighboring properties or the community; ~~and~~ and

1 34. Compatible with adjacent residential uses and surrounding neighborhoods. The community development
2 director or designee may impose conditions upon the approval of a home business permit to ensure said
3 compatibility ~~with adjacent residential uses and surrounding neighborhoods. These conditions may include~~ing,
4 but ~~are~~ not limited to, the following:

- 5 a. Further limiting the hours, days, place and manner of operation.
- 6 b. Requiring site and building design features that minimize environmental impacts such as noise,
7 vibration, air pollution, glare, odor and dust.
- 8 c. Requiring additional building setbacks, and increased lot area, depth or width.
- 9 d. Further limiting the building area used by the home business and restricting the location of the use on the
10 site in relationship to adjoining uses.
- 11 e. Designating the size, number, location and design of vehicle access points.
- 12 f. Requiring street right-of-way to be free at all times of vehicles associated with the home business.
- 13 g. Requiring landscaping, buffering and/or screening of the home business from adjoining uses and
14 establishing standards for the continued maintenance of these improvements.
- 15 h. Requiring storm drainage improvements, and surfacing of parking and loading areas.
- 16 i. Limiting the extent and type of interior or exterior building remodeling necessary to accommodate the
17 home business.
- 18 j. Limiting or setting standards for the location and intensity of outdoor lighting.
- 19 k. Requiring and designating the size, height, location of fences and materials used for their construction.

20 G. Home business ~~P~~permit – Revocation and Expiration.

- 21 1. The community development director or designee may revoke a home business permit if the conditions of
22 approval have not been complied with and the home business is otherwise being conducted in a manner
23 contrary to this title.
- 24 2. When a home business permit has been revoked due to violation of these standards, a minimum period of
25 one year shall elapse before another application for a home business permit by the applicant(s) or member of
26 the family residing on the subject property will be considered.
- 27 3. A home business permit shall become invalid if the applicant moves his or her residence.

28 H. Nonconforming home business use. An ongoing home business may be granted nonconforming status; provided,
29 that it was previously permitted and has been in continuous operation since initial approval. The burden of providing
30 a home business's nonconforming status rests with the property owner or tenant, pursuant to EMC 18.90.110. A
31 home business which cannot prove nonconforming status shall be considered in violation of this section and shall
32 cease until the appropriate approvals have been granted.

33 ~~18.100.080. Limited home businesses.~~

34 ~~A. The purpose of this section is to provide standards which allow residents to operate businesses or conduct~~
35 ~~commercial activity from their principal residence or from a permitted accessory structure while achieving the goals~~
36 ~~of retaining the residential character of the dwelling and the neighborhood.~~

37 ~~B. Limited home businesses are permitted as an accessory use in conjunction with residential detached dwelling and~~
38 ~~middle housing use types.~~

~~C. The same uses exempted under EMC 18.100.070(B) are exempt from the regulations of this section.~~

~~D. Prohibited Activities:~~

~~1. No limited home business or such use on property that a person owns, occupies or is in lawful control of, contrary to the provisions of this section.~~

~~2. The following on-site activities are prohibited as home businesses:~~

~~a. Motor vehicle, commercial truck and heavy equipment repair.~~

~~b. Motor vehicle, commercial truck and heavy equipment bodywork.~~

~~c. Motor vehicle, commercial truck and heavy equipment painting.~~

~~d. Motor vehicle, commercial truck and heavy equipment wash and/or detailing services.~~

~~e. Storage of motor vehicles, commercial trucks or heavy equipment.~~

~~f. Storage of used parts of vehicles and/or used machinery in inoperable condition.~~

~~g. Storage of building materials such as lumber, plasterboard, pipe, paint or other construction materials unless being used to construct a specific structure on the premises, pursuant to a current city building permit.~~

~~E. The following performance standards prescribe the parameters under which limited home business activities may be conducted when incidental to a residential use. Activities that exceed these performance standards are subject to Chapter 18.70 EMC, Permitted Land Uses, to determine the appropriate civic, commercial, or industrial use category that applies to the activity.~~

~~The following standards apply to all limited home business activities within the city of Edgewood:~~

~~1. A limited home business permit shall be obtained directly through the city clerk's office for each limited home business and any property on which a limited home business is undertaken.~~

~~2. A city general business license must be obtained and maintained for each limited home business as described in Chapter 5.05 EMC.~~

~~3. The limited home business shall be clearly incidental and secondary to the use of the property as residential purposes and shall not change the residential character of the dwelling or neighborhood.~~

~~4. All the activities of the limited home business(es) shall be conducted indoors, except for those related to growing or storing of plants used by the limited home occupation(s).~~

~~5. No modification shall be made to the dwelling to establish or operate the limited home business that would cause it to resemble anything other than a dwelling.~~

~~6. There shall be no more than three deliveries per week to the residence by suppliers.~~

~~7. Traffic generated by a limited home business shall not exceed 16 round trips per day associated with the home business, including deliveries and client-related trips.~~

~~8. Sales, either retail or wholesale, shall be limited to mail order and telephone sales with off-site delivery.~~

~~9. Services to patrons shall be arranged by appointment or provided off-site.~~

~~10. Utility demand for sewer, water, electricity, garbage or natural gas shall not exceed normal residential levels.~~

~~11. Equipment or operation processes shall not be utilized which would produce or cause the emission of gases, dust, odors, vibration, electrical interference, smoke, noise, or light in a manner likely to cause offense or irritation to neighboring residents.~~

~~12. The home business(es) shall not use electrical or mechanical equipment that results in:~~

~~a. A change to the fire rating of the structure(s) used for the home business(es);~~

~~b. Visual or audible interference in radio or television receivers, or electronic equipment located off-premises; or~~

~~c. Fluctuations in line voltage at or beyond the property line.~~

~~13. There shall be no storage, distribution and/or production of toxic or flammable materials, nor spray painting or spray finishing operations that involve toxic or flammable materials, which in the judgment of the fire code official pose a dangerous risk to the residence, its occupants, and/or surrounding properties. An applicant shall make available the material safety data sheets, listing all potentially toxic and/or flammable materials associated with the home occupation, to the fire code official if requested for review.~~

~~F. One or more limited home business may be conducted in a residential dwelling as accessory uses, excepted as prohibited in EMC 18.100.070(C), Prohibited Activities; provided, that the limited home business shall:~~

~~1. Not have any employee, volunteer or other person engaged in the commercial activity on the site, other than residents of the dwelling.~~

~~2. Be operated in its entirety within the principal dwelling.~~

~~3. Not have a separate entrance from outside the building.~~

~~4. Not use any mechanical equipment except that which is used normally for purely domestic or household purposes.~~

~~5. Not utilize more than 25 percent of the total floor area of the living space of the dwelling. Areas within attached garages, unfinished basements and storage buildings shall not be considered living space for purposes of calculating allowable home business area but may be used for storage of goods associated with the limited home business.~~

~~6. Not show any evidence that a business is being conducted from the premises.~~

~~7. Not have any exterior signage that identifies the property as a business location.~~

~~8. Not allow clients or customers to visit the premises for any reason.~~

~~9. Not have any exterior storage of materials.~~

~~10. Each business must meet the requirement of Chapter 5.05 EMC, Business Licenses and Regulations.~~

~~G. Permit Revocation and Expiration.~~

~~1. The community development director or designee may revoke a home business permit if the conditions of approval have not been complied with and the home business is otherwise being conducted in a manner contrary to this title.~~

~~2. When a home business permit has been revoked due to violation of these standards, a minimum period of one year shall elapse before another application for a home business permit by the applicant(s) or member of the family residing on the subject property will be considered.~~

~~3. A home business permit shall become invalid if the applicant moves his or her residence.~~

~~H. An ongoing home business may be granted nonconforming status; provided, that it was previously permitted and has been in continuous operation since initial approval. The burden of providing a home business's nonconforming status rests with the property owner or tenant, pursuant to EMC 18.90.110. A home business which cannot prove nonconforming status shall be considered in violation of this section and shall cease until the appropriate approvals have been granted.~~

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CITY OF EDGEWOOD STAFF REPORT PLANNING COMMISSION AGENDA ITEM

Date: June 8, 2026

Title: Home Businesses & Licensing Regulations

Attachments: Attachment A – DRAFT Recommendation to City Council
Attachment B – DRAFT Redline Code Amendments

Submitted By: Jeremy Metzler, PE – Community Development Director

Background Information:

EMC 18.100.070 (Home Business) and EMC 18.100.080 (Limited Home Business) establish regulations for home-based businesses within the City of Edgewood. These rules were primarily enacted in 2003 and last significantly updated in 2015. The City has only made minor edits since 2015 to address conflicts with other sections of the municipal code. Staff and the Economic Development Advisory Board (EDAB) have recently flagged these regulations as being repetitive and convoluted, which can be a significant deterrent to home-based businesses.

In December 2024, following several years of review with the Planning Commission (PC) and EDAB, the City Council adopted the 2024 Comprehensive Plan Periodic Update. This update included the following home-based business goals:

- **ED.3a:** Provide support for existing small businesses, home-base businesses, and entrepreneurs with initiatives such as facilitating regular meetings for home-based businesses, maintaining and circulating a list of local small businesses, and providing education and resources.
- **ED.3b:** Encourage home-based businesses that do not impact the residential character of the neighborhood. Limit signs, parking and truck deliveries, and other potential adverse impacts and consider an amnesty program for existing unlicensed or unregistered home-based businesses.

Finally, the Department of Revenue (DOR) and Association of Washington Cities (AWC) have both flagged Edgewood's business licensing regulations for an update to comply with recent changes in state law. In short, EMC 5.05 must include indexing language before the state's minimum threshold exceeds \$5,000. Staff does not expect this to occur for several years, but rather than wait and possibly forget, it may be appropriate to update that section of code now while it is fresh in our minds.

This topic has been discussed with the Planning Commission (PC) for the last few meetings, and links to prior meeting materials are provided here for reference:

- March 9, 2026 – [Meeting Materials](#) and [Recording](#)
- April 13, 2026 - [Meeting Materials](#) and [Recording](#)
- May 11, 2026 – [Meeting Materials](#) and [Recording](#)

Resources:

- [EMC 5.05](#) General Business License Code
- [EMC 18.100.070](#) Home Business Code
- [EMC 18.100.080](#) Limited Home Business Code

Tentative Schedule:

March 9, 2026 – Planning Commission Introduction (COMPLETE)

April 13, 2026 – Planning Commission Discussion (COMPLETE)

April 24, 2026 – SEPA Issuance and Comment Period (COMPLETE)

May 11, 2026 – Planning Commission Public Hearing (COMPLETE)

June 8, 2026 – Planning Commission Recommendation

July 7, 2026 – City Council Study Session Introduction

July 14, 2026 – City Council Regular Meeting and Potential Action

Current Discussion:

Following last month's public hearing and discussion, where no comments were provided, staff has coordinated review with legal counsel and finalized the attached draft amendments for final review and consideration by the Planning Commission.

Analysis:

Per EMC 18.60.020, the Planning Commission has the authority to review and make recommendations on proposed amendments to city regulations concerning land use and development. Staff have reviewed the criteria under EMC 18.60.220(A) and offers the following analysis:

1. Whether the proposed amendment(s) conform to the Growth Management Act (Chapter [36.70A](#) RCW). **Response:** The proposed amendments conform with the Growth Management Act requirements for home businesses.
2. Whether the proposed amendment(s) are consistent with and implement the city's comprehensive plan, including the goals, policies and implementation strategies of the various elements of the plan. **Response:** The proposed amendments are consistent with and implement the city's comprehensive plan goals and policies.
3. Whether circumstances related to the proposed amendment(s) and/or the area in which it is located have substantially changed since the adoption of the city's comprehensive plan. **Response:** The proposed amendments address existing gaps and deficiencies, simplifying and clarifying existing regulations, consistent with the 2024 Comprehensive Plan's Goals and Policies.
4. Whether the assumptions upon which the city's comprehensive plan is based are no longer valid, or whether new information is available which was not considered during the adoption process or any annual amendments of the city's comprehensive plan. **Response:** The

proposed amendments address existing gaps and deficiencies, simplifying and clarifying existing regulations, consistent with the 2024 Comprehensive Plan's Goals and Policies.

5. Whether the proposed amendment(s) reflects current, widely held values of the residents of the city. Response: The proposed amendments reflect the current and widely held values of the residents of the city.

Staff Recommendation:

Following any further discussion on the matter, the Planning Commission is invited to make a formal recommendation to the City Council on adoption of the proposed draft amendments to EMC Titles 5 and 18 regarding home businesses and licensing regulations. A draft recommendation has been prepared by staff, attached herein for consideration.



CITY OF EDGEWOOD
PLANNING COMMISSION
RECOMMENDATION

The Planning Commission voted X-X to recommend that the City Council adopt the proposed draft amendments to EMC Titles 5 and 18 regarding home businesses and licensing regulations, as attached hereto.

RECOMMENDED BY THE CITY OF EDGEWOOD PLANNING COMMISSION
ON THE 8TH DAY OF JUNE 2026.

JoAnn Overfield
Planning Commission Chair

Attest by:

Josh Kubitza, AICP
Planning Manager

Chapter 5.05

GENERAL BUSINESS LICENSE CODE

5.05.010 Title.

This chapter shall be known, cited, and referenced as the "General Business License Code."

5.05.020 Definitions.

A. Unless the context clearly requires otherwise, the definitions in this section apply throughout this chapter. Any word or phrase not contained herein shall be first referenced to Chapter 18.20 EMC for meaning.

1. For any word or term not defined herein, the latest edition of Webster's Dictionary shall be used.

2. The director or their designee has the final authority to determine the interpretation or usage of terms used in this chapter.

B. Additional definitions not contained in Chapter 18.20 EMC that apply to this title are:

1. "Business" means all activities, occupations, pursuits or professions engaged in the city of Edgewood (as the term "engage in" is defined below).

2. "City clerk" means the city clerk for the city or their designee.

3. Engage In or Engaging In. The city expressly intends that this definition includes any activity sufficient to establish nexus for the purpose of applying the business license fee under the law and constitutions of the United States and the state of Washington. Nexus is presumed to continue as long as the taxpayer benefits from the activity that constituted the original nexus-generating contact or subsequent contacts. This definition is satisfied through any of the activities described in subsections (3)(a) through (e) of this section.

a. Commencing, conducting or continuing in business, and also the exercise of corporate or franchise powers, as well as liquidating a business when the liquidators thereof hold themselves out to the public as conducting such business.

b. This subsection sets forth examples of activities that constitute engaging in business in the city and establishes safe harbors for certain of those activities so that a person who meets the criteria may engage in de minimis business activities in the city without having to pay a business license fee. The activities listed in this section are illustrative only and are not intended to narrow the definition of "engaging in business" in subsection (B)(3)(a). If an activity is not listed whether it constitutes "engaging in business" in the city shall be determined by considering all the facts and circumstances and applicable law.

c. Without being all-inclusive, any one of the following activities conducted within the city by a person, or its employee, agent, representative, independent contractor, broker or another acting on its behalf, constitutes engaging in business and requires a person to register and obtain a business license:

i. Owning, renting, leasing, maintaining, or having the right to use, or using, tangible personal property, intangible personal property or real property permanently or temporarily located in the city.

ii. Owning, renting, leasing, using or maintaining an office, place of business, or other establishment in the city.

iii. Soliciting sales.

iv. Making repairs or providing maintenance or service to real or tangible personal property, including warranty work and property maintenance.

- 1 v. Providing technical assistance or service, including quality control, product inspections, warranty
2 work, or similar services on or in connection with tangible personal property sold by the person or on
3 its behalf.
- 4 vi. Installing, constructing or supervising installation or construction of real or tangible personal
5 property.
- 6 vii. Soliciting, negotiating, or approving franchises, licenses or other similar agreements.
- 7 viii. Collecting current or delinquent accounts.
- 8 ix. Picking up and transporting tangible personal property, solid waste, construction debris or
9 excavated materials.
- 10 x. Providing disinfecting and pest control services, employment and labor pool services, home nursing
11 care, janitorial services, appraising, landscape architectural services, security system services,
12 surveying and real estate services, including the listing of homes and managing real property.
- 13 xi. Rendering professional services such as those provided by accountants, architects, attorneys,
14 auctioneers, consultants, engineers, professional athletes, barbers, baseball clubs and other sports
15 organizations, chemists, psychologists, court reporters, dentists, doctors, detectives, laboratory
16 operators, teachers, or veterinarians.
- 17 xii. Meeting with customers or potential customers, even when no sales or orders are solicited at the
18 meetings.
- 19 xiii. Training or recruiting agents, representatives, independent contractors, brokers or others
20 domiciled or operating on a job in the city, acting on its behalf, or for customers or potential
21 customers.
- 22 xiv. Investigating, resolving, or otherwise assisting in resolving customer complaints.
- 23 xv. In-store stocking or manipulating products or goods, sold to and owned by a customer, regardless
24 of where sale and delivery of the goods took place.
- 25 xvi. Delivering goods in vehicles owned, rented, leased, used or maintained by the person or another
26 acting on its behalf.
- 27 d. If a person, or its employee, agent, representative, independent contractor, broker, or another person
28 acting on the person's behalf, engages in no other activities in or with the city but the following, it need not
29 register and obtain a business license:
- 30 i. Meeting with suppliers of goods and services as a customer.
- 31 ii. Meeting with government representatives in their official capacity, other than those performing
32 contracting or purchasing functions.
- 33 iii. Attending meetings, such as board meetings, retreats, seminars and conferences, or other meetings
34 wherein the person does not provide training in connection with tangible personal property sold by the
35 person or on its behalf. This provision does not apply to any board of directors member or attendee
36 engaging in business, such as a member of a board of directors who attends a board meeting.
- 37 iv. Renting tangible or intangible property as a customer when the property is not used in the city.
- 38 v. Attending, but not participating in, a "trade show" or "multiple vendor events." Persons participating
39 at a trade show shall review the city's trade show or multiple vendor event ordinances.

- vi. Conducting advertising through the mail.
- vii. Soliciting sales by phone from a location outside the city.
- e. A seller located outside the city merely delivering goods into the city by means of a common carrier is not required to register and obtain a business license; provided, that it engages in no other business activities in the city. Such activities do not include those in subsection (B)(4) of this section.
4. "Licensee" means any business or business enterprise that applies for or is granted a business license. The term "licensee" shall also mean the person who submits a business license for approval, the owner or operator of a business or business enterprise, and any corporation, partnership, nonprofit or organization which owns or operates the business or business enterprise.
5. "Business Licensing Service" and "BLS" mean the office within the Washington State Department of Revenue providing business licensing services to the city of Edgewood.
- 5.05.030 Administration and enforcement.**
- A. The city clerk shall have general charge of, and supervision over, the administration and enforcement of this chapter.
- B. The city clerk may call upon other city departments to aid in the enforcement of this chapter.
- C. The licensee shall, upon reasonable request, provide or allow the city clerk to inspect relevant documentation for verification of the information provided by the licensee on the business license application.
- 5.05.040 General business license required – Exemption.**
- A. Unless exempt per subsection B below, ~~it~~ is unlawful for anyone to engage in business in the city without having first obtained a general business license for the current calendar year or unexpired portion thereof and paid the fees prescribed in this chapter.
- B. To the extent set forth in this section, ~~the following~~ persons and businesses whose annual value of products, gross proceeds of sales, or gross income of the business conducted within the city is equal to or less than the threshold listed in the city of Edgewood fee schedule adopted pursuant to EMC 3.35.020 shall be exempt from the registration, license, and license fee requirements. This exemption does not apply to regulatory license requirements, activities that require a specialized permit, or other occupancy requirements of the city. Said exemption threshold shall be at least \$5,000 or the amount determined as outlined below if higher:
1. Beginning January 1, 2026, this threshold amount will be adjusted every four-years (forty-eight months) on January 1, by an amount equal to the increase in the Consumer Price Index ("CPI") for "West Urban, All Urban Consumers" (CPI-U) for each 12-month period ending on June 30 as published by the United States Department of Labor Bureau of Labor Statistics or successor agency. The first such adjustment calculation will occur on January 1, 2030, with subsequent calculations occurring every four years thereafter. To calculate this adjustment, an initial value of \$4,000 will be multiplied by one plus the cumulative four-year (forty-eight month) CPI increase using each 12-month period ending on June 30 of each prior year, and rounded to the nearest \$100. However, if any of the annual CPI increases are more than five (5) percent, a five (5) percent increase will be used in computing the annual basis and if any of the annual CPI decreased during the forty-eight-month period, a zero (0) percent increase will be used in computing the annual basis. ~~Any person or business whose annual value of products, gross proceeds of sales, or gross income of the business in the city is equal to or less than \$5,000 and who does not maintain a place of business within the city shall be exempt from the general business license requirements in this chapter.~~
2. ~~The exemption does not apply to regulatory license requirements, activities that require a specialized permit, or occupancy requirements required by the city.~~

5.05.050 Separate business license required.

A. A separate license shall be obtained for each physical location of a business enterprise within the city and each license shall authorize the licensee to carry on, pursue or conduct business only at the physical location of the enterprise as stated on the license.

B. A separate license shall not be required for a facility determined by the city clerk to be an accessory facility to a business for which a license is issued.

C. When the licensee wishes to change the location of their business within the city, the licensee shall notify the BLS sufficiently in advance of the intended move to allow BLS to notify the city clerk, and any other regulatory agencies with an interest in the business, and providing enough time for the clerk and other agencies to review the intended new location. Business shall not commence at the new location until approved. If the move is approved, a new license will be issued for the new place of business, as long as no grounds exist for denial or revocation of the license, as set forth in EMC 5.05.130. A change of location may require submitting a zoning change of use for the new location.

5.05.060 License not transferable.

A. No license issued under the provisions of this chapter shall be transferred or assigned.

B. In the event that the ownership of a business changes, the acquiring person shall obtain their own license for the business as provided for in this chapter before commencing business activities under the acquired business.

5.05.070 License posting.

All licenses issued pursuant to this chapter shall be posted in a conspicuous place at the business location for which it was issued.

5.05.080 Disclaimer of city liability.

A. Issuance of a license pursuant to this chapter does not constitute the creation of any duty by the city to indemnify the licensee for any wrongful acts against the public or any individual, or to guarantee the quality of goods, services, or expertise of a licensee.

B. The issuance of a license does not shift responsibility from the licensee to the city for proper training, conduct, or equipment of the licensee or his/her agents, employees or representatives.

5.05.090 Application procedure – License fee.

A. Application for the general business license provided for in this chapter is made by filing a business license application with BLS. The application shall include all information required for each license requested, all fees due for all licenses and any fee set forth in the city of Edgewood fee schedule, as well as the application handling fee required by RCW 19.02.075 and any other fees required by this code

B. The BLS shall provide all necessary information to the city clerk for review. The city clerk shall determine whether to approve issuance of the license through the BLS which will then produce the license document. If the determination is made to deny the application, the city shall provide the decision to the applicant in writing. An applicant who is denied may pursue an appeal as provided for in EMC 5.05.130 through 5.05.180.

5.05.100 License does not indicate legality of business.

A. The issuance of a license pursuant to this chapter shall not be evidence of the legality of a business or indicate that the business is conducted in conformity with any laws or regulations of the city, the state of Washington or the United States.

B. The issuance of a business license shall not prevent the city, the state of Washington or the United States from taking any action relating to the conduct of the business or the licensee, including, but not limited to, action to revoke the license or deny an application for a future license, an action to cause the cessation of the business, or any enforcement action described in this chapter.

5.05.110 License renewal – Late penalties.

A. The business license issued through the provisions of this chapter shall expire on the date established by the BLS and must be renewed on or before that date to lawfully continue to engage in business within the city.

B. Application for renewal of the license is made through the BLS and shall include all information required for renewal of all licenses involved, the total fee for all licenses, as well as the renewal application handling fee required by RCW 19.02.075.

C. The license expiration date and respective city license fee amount may be prorated as necessary in order to synchronize the license expiration with the expiration date of the business license account maintained by the BLS.

D. Failure to complete the business license renewal by the expiration date shall incur the late renewal penalty required by RCW 19.02.085 in addition to all other fees due.

E. Failure to complete the license renewal within 120 days after expiration shall result in the cancellation of the license and shall require submitting a new application for a business license in order to lawfully engage in business within the city. The city may require payment of all past due amounts prior to approving the new business license.

F. The city may impose additional penalties in addition to those referenced in this section, as provided for in EMC 5.05.190.

5.05.120 Overpayment or refund of license fee.

Whenever a business makes an overpayment, and within two years after the date of such overpayment makes an application for a refund or credit for the overpayment, the claim shall be considered by the city clerk and, if approved, shall be repaid by the city.

5.05.130 Grounds for denial or revocation of license.

A. In addition to other actions or penalties provided by law, the city may deny or revoke any license applied for or issued pursuant to this chapter for any of the following reasons:

1. The license application contains an omission or misrepresentation of material fact.
2. The license was procured by fraud.
3. The license is used or is intended to be used for a business materially different from that applied for.
4. The licensee or business fails to pay the licensing fee applicable to such license.
5. The licensee or business violates any of the requirements of this chapter.
6. The business engages in, or the licensee seeks a license to engage in, an unlawful business or activity.
7. The business operates in a manner that constitutes a nuisance pursuant to common law or the ordinances and codes of the city of Edgewood or the statutes of the state of Washington.
8. The licensee is not 18 years of age or older at the time the license is applied for.
9. The licensee or the business has had a similar license denied or revoked and has not corrected the basis for the denial or revocation.

B. The issuance of a license that could have been denied pursuant to subsection (A) of this section shall not prohibit the city from taking action to revoke the license at a later date, and it shall at all times remain the exclusive responsibility of the licensee to ensure that the business complies with the requirements of this chapter.

5.05.140 Denial or revocation of license – Notice and opportunity to be heard.

In accordance with EMC 5.05.150 through 5.05.180, a licensee shall have an opportunity to be heard subsequent to the denial of a business license, or prior to the revocation of an existing license.

5.05.150 Notice of license denial or revocation and scheduling of hearing.

A. Denial of License. Any action to deny a license applied for or issued shall be commenced by the city clerk's notice of the denial. A notice issued under this subsection shall substantially comply with the following:

1. The notice shall be delivered, by first class mail or by personal service, to the business license applicant or the holder of the business license as set forth in the most recent business license application.
2. The notice shall describe the basis for the denial.
3. The notice shall describe the corrective action, if any, that may be taken to eliminate the basis for denial.
4. The notice shall specify the deadline for the applicant to submit an appeal to the hearing examiner in order to request an appeal hearing to contest the denial. If an appeal is filed, the appeal hearing shall be scheduled not less than 14 but not more than 60 days after the date the notice is delivered in accordance with this subsection (A).
5. The notice shall provide that if the licensee fails to appear on the date specified in the notice, the appeal of the denial is waived.

B. Revocation of License. Any action to revoke an issued license shall be commenced by a notice of the revocation. A notice issued under this subsection shall substantially comply with the following:

1. The notice shall be delivered, by first class mail or personal service, to the holder of the business license as set forth in the most recent business license application or business license issued.
2. The notice shall describe the basis for the revocation.
3. The notice shall describe the corrective action, if any, that may be taken to eliminate the basis for the revocation.
4. The notice shall specify the deadline for the applicant to submit an appeal to the hearing examiner, in order to request an appeal hearing to contest the revocation. If an appeal is filed, the appeal hearing shall be scheduled not less than 14 but not more than 60 days after the date the notice is delivered in accordance with subsection (A) of this section.
5. The notice shall provide that if the holder of the business license fails to appear on the date specified in the notice, default judgment shall be entered and the license shall be revoked on the failure to appear.

C. Operation during Appeal. When a license application has been denied or revoked and during the pendency of any appeal on the denial or revocation, the applicant/licensee shall not engage in the business for which the license was denied or revoked unless or until the license issues pursuant to the hearing examiner's order or court judgment.

5.05.160 Hearing to deny or revoke business license.

A. Parties to Hearing. The parties to a hearing provided pursuant to this chapter shall be the city and the licensee (and/or legal counsel for the two parties).

B. Date for Hearing. Hearings shall be scheduled to occur no less than 14 but not more than 60 days after the date the notice of denial or revocation is delivered in accordance with EMC 5.05.150; provided, that additional hearings may be held after 60 days as determined by the hearing examiner. The hearing examiner shall have discretion to grant continuances and reschedule hearings in the interest of the parties and justice.

C. Prehearing Conferences. The hearing examiner may, in the examiner's discretion or at the request of either party, hold a prehearing conference to schedule additional hearings, order discovery, and to make other appropriate pretrial determinations. A prehearing conference may be held by telephone.

D. Hearing Process. The parties to the hearing, or legal counsel for the parties, may call witnesses and present evidence and rebuttal evidence subject to the following:

1. The city shall have the burden of proving, by a preponderance of the evidence, that there are sufficient grounds for the denial or revocation of the license pursuant to EMC 5.05.130. Violations subject to civil infraction or criminal penalties shall be enforced in Pierce County District Court (PCDC). (See EMC 5.05.190.)

2. The parties shall be responsible for securing the appearance of any witnesses they may call. Neither the city nor the hearing examiner shall have the burden of securing any witnesses on behalf of the licensee.

3. Formal rules of evidence shall not apply. The hearing examiner may allow hearsay evidence and may permit the admission of evidence without proof of the chain of custody of evidence. Notes, reports, summaries, notices, photographs, or other materials prepared by the parties may be admitted into evidence if requested, without satisfaction of formal rules of evidence. Notwithstanding the admission of evidence, the hearing examiner shall determine the proper weight to be assigned to any evidence admitted.

E. Default Judgment. If the licensee fails to appear on the hearing date specified in the notice or at any other hearing set by the hearing examiner, the right to a hearing shall be forfeit and default judgment shall be entered and the license shall be denied or revoked.

5.05.170 Authority of hearing examiner – Order – Appeal.

A. Authority. The hearing examiner shall have the authority to determine whether or not there are sufficient grounds for the denial or revocation of the business license, pursuant to EMC 5.05.130.

B. Order. The hearing examiner shall issue a written order that sets forth a procedural summary of the hearing, his or her findings of fact and conclusions of law, and his or her determination. In the event of a default judgment, the written order shall set forth whether notice was properly issued, the facts regarding the failure of the licensee to appear, and a determination of default in the event notice was proper. The written order shall be delivered to the parties by first class mail, deposited in the mail no more than 21 days following the conclusion of the hearing. The order of the hearing examiner shall become effective on the third day following placement of the order in the mail.

C. Appeal. An appeal of the order of the hearing examiner must be filed with the superior court within 21 days of the effective date of the order.

5.05.180 Corrective action prior to hearing.

In the event the licensee takes corrective action and the grounds for the denial or revocation are abated, and such corrective action and abatement occurs prior to the date set for hearing, the hearing shall be canceled, and the license shall be issued or reissued.

5.05.190 Violations and enforcement – Penalties.

A. Any violation of any provision of this chapter may be enforced as provided in this section.

B. Each separate date, or portion thereof, during which any violation occurs shall constitute a separate violation.

C. Enforcement.

1. Civil Infraction. Any person who violates this chapter is subject to issuance of a Class 1 civil infraction as set forth in RCW 7.80.120(1)(a), filed in PCDC and processed in the same manner as other infractions. If a person cited for failure to obtain a business license appears before the PCDC and provides written evidence that he or she obtained a business license prior to adjudication of the infraction, the monetary penalty shall be reduced to \$100.00 and the court may assess court administrative costs of \$25.00. The court administrative costs shall be in lieu of the statutory assessments referenced in RCW 7.80.120.

2. Criminal Violation. A person who knowingly violates a provision of this chapter, or commits a repeat violation of this chapter, is guilty of a misdemeanor, punishable by up to the maximum penalty established in RCW 9A.20.021(3). For purposes of this section, "repeat violation" means either a prior committed finding by the PCDC of an infraction issued under this chapter, or a committed finding by the hearing examiner of a violation of this chapter by the same business, licensee or person within a five-year period.

1 3. Injunction. In addition to or as an alternative to any other enforcement or penalty provided for in this chapter,
2 and because a violation constitutes an actual injury to the community, the city may seek injunctive relief or
3 other equitable relief to prevent any activity in violation of this chapter.

4 4. Collections. Any license fees or penalties due and unpaid under this chapter, and all costs and expenses,
5 constitute a debt to the city and may be collected by referral to a collection agency in accordance with Chapter
6 3.55 EMC and RCW 19.16.500 or court proceedings the same as any other debit in like amount which is in
7 addition to all other existing remedies. In any such action, the prevailing party shall be entitled to recover its
8 reasonably incurred costs, expenses, and fees, including attorneys' fees.

Chapter 18.100

DEVELOPMENT STANDARDS – USE SPECIFIC

...

18.100.070 Home businesses

A. Purpose. The purpose of this section is to provide standards which allow residents to operate businesses or conduct commercial activity from their principal residence or from a permitted accessory structure while achieving the goals of retaining the residential character of the dwelling and the neighborhood.

BA. Applicability – Home business permit required. Unless the proposed business or commercial activity is exempt per subsection C or complies with the limited activity restrictions under subsection E.2, Home businesses are limited to an accessory use in conjunction with a residential detached dwelling use type. Obtaining a home business permit is required ~~in addition to the general business license required by Chapter 5.05 EMC.~~ The home business permit is subject to the regulations of this section, reviewed under the Type 1 permit process as provided in EMC 18.50.050, and administered through the community development department ~~city clerk's office.~~

CB. Exemptions. The following uses are exempt from the regulations of this section:

1. Any non-residential use in a permitted accessory structure that is otherwise permissible in the zoning district under EMC 18.70.050. This exemption does not apply to non-residential uses within any residential dwelling unit. ~~Child daycare services, home-based (624410, part), except a home business permit is still required to ensure compliance with EMC 18.100.040.~~

2. Accommodation (NAICS Sector 721) – bed-and-breakfast inns (NAICS 721191).

3. Garage sales, yard sales, bake sales, temporary home bazaars for hand-crafted items or parties for the display of clothing, gifts and household products, and other similar uses shall not be subject to regulation pursuant to this section; provided, that:

a. Any such use shall not be in existence for more than four times in any one calendar year, and is not in violation of any other section of the title or other city ordinances; and

b. Any such garage sales and yard sales involve only the sale of household goods, none of which were purchased for the purpose of resale.

4. For the profit sale of produce or other food products is limited to the temporary seasonal sale of produce grown on the premises.

5. Hobbies which do not result in payment to those engaged in such activity.

DC. Prohibited Activities. No business or commercial activity shall be allowed on property that a person owns, occupies, or is in lawful control of, within residential dwellings or structures accessory thereto, contrary to the provisions of this section. The following on-site activities are prohibited as home businesses:

1. Repair, bodywork, painting, washing, detailing, or storage of ~~No home business or business use on residential property that a person owns, occupies or is in lawful control of, contrary to the provisions of this section.~~

~~2. The following on-site activities are prohibited as home businesses:~~

~~a. Motor vehicles, commercial trucks and/or other heavy equipment repair.~~

~~b. Motor vehicle, commercial truck and heavy equipment bodywork.~~

~~e. Motor vehicle, commercial truck and heavy equipment painting.~~

~~d. Motor vehicle, commercial truck and heavy equipment wash and/or detailing services.~~

~~e. Storage of motor vehicles, commercial trucks or heavy equipment.~~

~~f.2.~~ Storage of used parts of vehicles and/or used machinery in inoperable condition.

~~g.3.~~ Storage of building materials such as lumber, plasterboard, pipe, paint or other construction materials unless being used to construct a specific structure on the premises, pursuant to a current city building permit.

ED. Performance Standards. The following performance standards prescribe the parameters under which one or more home business activities may be conducted on private property when incidental to a residential use. Said activities that exceed these performance standards are subject to the use standards under Chapter 18.70 EMC, Permitted Land Uses, ~~to determine the appropriate civic, commercial, or industrial use category that applies to the activity.~~

1. The following standards apply to all home business activities within the city of Edgewood:

~~a. A home business permit shall be obtained directly through the city clerk's office for each home business and any property on which a home business is undertaken.~~

a. ~~b.~~ All home business activities are subject to the general business license requirements under ~~A city business registration shall be obtained and maintained for each home business as described in~~ Chapter 5.05 EMC.

~~e. The home business shall be clearly incidental and secondary to the use of the property as residential purposes and shall not change the residential character of the dwelling or neighborhood.~~

b. The activities must be operated by a resident of the property on which the activity is located, with no more than one non-resident employee on site at any given time. If there is a non-resident employee, the site must have one parking space in addition to any parking required for the dwelling on the same parcel of land.

c. The activities shall be accessory to residential detached dwelling and middle housing use types, limited to 40 percent of the gross floor area of the residence, including garages and unfinished basements, and accessory buildings, with proof of owner authorization if the applicant is not the property owner.

d. The activities shall not change the residential character of the dwelling and/or neighborhood, being conducted completely within the dwelling or other permitted accessory structure(s), including the storage of all materials, parts, tools and other equipment used in the activity, except for the growing or storing of plants that may be used by the activity.

e. The activities must not utilize more than two vehicles and utility trailers with a gross vehicle weight rating (GVWR) of more than 10,000 pounds per truck/trailer combination. If there are vehicles and utility trailers, parking must be provided for on the subject property.

~~f.~~ d. There shall be no more than three deliveries per week to the residence by suppliers for the business activities.

g. ~~e.~~ Traffic generated by ~~a home the business activities~~ shall not exceed 16 round trips per day per property associated with the home business, including deliveries and client-related trips.

h. ~~f.~~ Utility demand for sewer, water, electricity, garbage or natural gas shall not exceed normal residential levels, as determined by the utility purveyor.

ig. The activity shall not interfere with other existing and/or permitted uses on nearby land, including but not limited to ~~Equipment or operation processes shall not be utilized~~ which would produce or cause the emission of gases, dust, odors, vibration, electrical interference, smoke, noise, or light in a manner likely to cause offense or irritation to neighboring residents.

jh. The home business(es) shall not use electrical or mechanical equipment that results in:

i. A change to the fire rating of the structure(s) used for the home business(es);

ii. Visual or audible interference in radio or television receivers, or electronic equipment located off premises; or

iii. Fluctuations in line voltage at or beyond the property line.

ki. The activity must comply with all applicable building, land use, and fire code requirements for permits, occupancy, and inspection, including any use of hazardous materials or equipment. There shall be no storage, distribution and/or production of toxic or flammable materials, nor spray painting or spray finishing operations that involve toxic or flammable materials, which in the judgment of the fire code official pose a dangerous risk to the residence, its occupants, and/or surrounding properties. An applicant shall make available the material safety data sheets, listing all potentially toxic and/or flammable materials associated with the home business, to the fire code official if requested for review.

l. Manufacturing activities shall be limited to small-scale assembly of already manufactured parts, but this shall not preclude production of small, individually hand-crafted items, furniture or other wood items as long as the activity meets the other standards of this section.

m. Customers, clients, and/or patrons of the activity shall be prohibited from the premises prior to 8:00 a.m. and after 8:00 p.m. on Mondays through Fridays, and prior to 9:00 a.m. and after 5:00 p.m. on weekends and holidays observed by the city.

n. All signs for the activity must meet the requirements of Chapter 18.97 EMC, Sign Code.

2. Home-based child daycare services (NAICS 624410, part) that are compliant with the standards under EMC 18.100.040 are exempt from the performance standards listed under subsection 1, above.

3. Proposed business activities that comply with subsection 1, above, and the following additional standards shall be considered limited home businesses and are exempt from the home business permit required under this section:

a. The structure shall not be modified to establish or operate the proposed business activity that would cause it to resemble anything other than a residential dwelling or accessory structure. This means there shall not be any separate entrance(s) for the activity from the outside of the structure, mechanical equipment that would not be used normally for domestic or household purposes, and/or be any evidence that a business is being conducted from the premises.

b. There shall be no exterior signage that identifies the property as a business location.

c. Other than residents of the dwelling, there shall be no non-resident employees, volunteers, or other persons engaged in the business activities on the site.

d. Any sales, either retail or wholesale, shall be limited to remote means (mail order, telephone, electronic, etc.) with off-site delivery.

e. Any service(s) offered to patrons shall be pre-arranged by appointment (no walk-ins), with no more than one patron on-site at any time, or provided off-site.

f. Activities are further limited to no more than 25 percent of the floor area of the dwelling. Areas within attached garages, unfinished basements and storage buildings shall not be considered floor area for purposes of calculating this allowable limited home business activity area, but these features may be used for storage of goods associated with the limited home business.

~~E. One or more home business may be conducted in a residential detached dwelling use type as an accessory use, except as prohibited in subsection C of this section, Prohibited Activities; provided, that the home business shall:~~

~~1. Be operated by a resident of the property on which the business is located.~~

~~2. Employ no more than one full or part time person, other than residents of the dwelling.~~

~~3. Be operated within the dwelling or other accessory buildings normally associated with uses permitted in the zone in which the property is located.~~

~~4. Not interfere with existing uses on nearby land or with other uses permitted in the zone in which the property is located.~~

~~5. Comply with all conditions imposed pursuant to this section.~~

~~6. Have one parking space per employee provided on the same parcel of land, in addition to that parking required for the dwelling.~~

~~7. Not utilize more than two vehicles and utility trailers, with a gross vehicle and trailer weight of more than 10,000 pounds, in the operation of the home business. Parking for said vehicles and/or trailers shall be provided on the subject property.~~

~~8. Store all materials, parts, tools and other equipment used in the operation of the home business entirely within the dwelling or accessory building.~~

~~9. Comply with building, land use and fire code requirements for permits, occupancy, and inspection, including use of hazardous materials or equipment.~~

~~10. Limit manufacturing to the small scale assembly of already manufactured parts but shall not preclude production of small, individually hand-crafted items, furniture or other wood items as long as the activity meets the other standards of this section.~~

~~11. Prohibit customers or clients on the premises prior to 8:00 a.m. and after 8:00 p.m. on Mondays through Fridays, and prior to 9:00 a.m. and after 5:00 p.m. on weekends and state or federal holidays.~~

~~12. Limit the home business activity to 40 percent of the gross floor area of the residence, including garages and unfinished basements, and accessory buildings; or 2,000 square feet, whichever is less.~~

~~13. Meet the signage requirements of Chapter 18.97 EMC, Sign Code.~~

~~14. Each business must meet the requirement of Chapter 5.05 EMC, Business Licenses and Regulations.~~

F. Home business permit – decision criteria. The decision to approve, approve with conditions, or deny an application for a home business permit shall be made by the community development director or designee upon findings of whether or not the ~~pur~~proposed home business activity is or will be:

1. In compliance with the standards contained in this section;

~~2. Subordinate to the residential use of the property; and~~

~~23.~~ Undertaken in a manner that is not detrimental or disruptive in terms of appearance or operation to neighboring properties or the community; ~~and~~ and

34. Compatible with adjacent residential uses and surrounding neighborhoods. The community development director or designee may impose conditions upon the approval of a home business permit to ensure said compatibility ~~with adjacent residential uses and surrounding neighborhoods. These conditions may include~~ ing, but ~~are~~ not limited to, the following:

- a. Further limiting the hours, days, place and manner of operation.
- b. Requiring site and building design features that minimize environmental impacts such as noise, vibration, air pollution, glare, odor and dust.
- c. Requiring additional building setbacks, and increased lot area, depth or width.
- d. Further limiting the building area used by the home business and restricting the location of the use on the site in relationship to adjoining uses.
- e. Designating the size, number, location and design of vehicle access points.
- f. Requiring street right-of-way to be free at all times of vehicles associated with the home business.
- g. Requiring landscaping, buffering and/or screening of the home business from adjoining uses and establishing standards for the continued maintenance of these improvements.
- h. Requiring storm drainage improvements, and surfacing of parking and loading areas.
- i. Limiting the extent and type of interior or exterior building remodeling necessary to accommodate the home business.
- j. Limiting or setting standards for the location and intensity of outdoor lighting.
- k. Requiring and designating the size, height, location of fences and materials used for their construction.

G. Home business ~~P~~permit – Revocation and Expiration.

1. The community development director or designee may revoke a home business permit if the conditions of approval have not been complied with and the home business is otherwise being conducted in a manner contrary to this title.
2. When a home business permit has been revoked due to violation of these standards, a minimum period of one year shall elapse before another application for a home business permit by the applicant(s) or member of the family residing on the subject property will be considered.
3. A home business permit shall become invalid if the applicant moves his or her residence.

H. Nonconforming home business use. An ongoing home business may be granted nonconforming status; provided, that it was previously permitted and has been in continuous operation since initial approval. The burden of providing a home business's nonconforming status rests with the property owner or tenant, pursuant to EMC 18.90.110. A home business which cannot prove nonconforming status shall be considered in violation of this section and shall cease until the appropriate approvals have been granted.

~~18.100.080. Limited home businesses.~~

~~A. The purpose of this section is to provide standards which allow residents to operate businesses or conduct commercial activity from their principal residence or from a permitted accessory structure while achieving the goals of retaining the residential character of the dwelling and the neighborhood.~~

~~B. Limited home businesses are permitted as an accessory use in conjunction with residential detached dwelling and middle housing use types.~~

~~C. The same uses exempted under EMC 18.100.070(B) are exempt from the regulations of this section.~~

~~D. Prohibited Activities:~~

~~1. No limited home business or such use on property that a person owns, occupies or is in lawful control of, contrary to the provisions of this section.~~

~~2. The following on-site activities are prohibited as home businesses:~~

~~a. Motor vehicle, commercial truck and heavy equipment repair.~~

~~b. Motor vehicle, commercial truck and heavy equipment bodywork.~~

~~c. Motor vehicle, commercial truck and heavy equipment painting.~~

~~d. Motor vehicle, commercial truck and heavy equipment wash and/or detailing services.~~

~~e. Storage of motor vehicles, commercial trucks or heavy equipment.~~

~~f. Storage of used parts of vehicles and/or used machinery in inoperable condition.~~

~~g. Storage of building materials such as lumber, plasterboard, pipe, paint or other construction materials unless being used to construct a specific structure on the premises, pursuant to a current city building permit.~~

~~E. The following performance standards prescribe the parameters under which limited home business activities may be conducted when incidental to a residential use. Activities that exceed these performance standards are subject to Chapter 18.70 EMC, Permitted Land Uses, to determine the appropriate civic, commercial, or industrial use category that applies to the activity.~~

~~The following standards apply to all limited home business activities within the city of Edgewood:~~

~~1. A limited home business permit shall be obtained directly through the city clerk's office for each limited home business and any property on which a limited home business is undertaken.~~

~~2. A city general business license must be obtained and maintained for each limited home business as described in Chapter 5.05 EMC.~~

~~3. The limited home business shall be clearly incidental and secondary to the use of the property as residential purposes and shall not change the residential character of the dwelling or neighborhood.~~

~~4. All the activities of the limited home business(es) shall be conducted indoors, except for those related to growing or storing of plants used by the limited home occupation(s).~~

~~5. No modification shall be made to the dwelling to establish or operate the limited home business that would cause it to resemble anything other than a dwelling.~~

~~6. There shall be no more than three deliveries per week to the residence by suppliers.~~

~~7. Traffic generated by a limited home business shall not exceed 16 round trips per day associated with the home business, including deliveries and client-related trips.~~

~~8. Sales, either retail or wholesale, shall be limited to mail order and telephone sales with off-site delivery.~~

~~9. Services to patrons shall be arranged by appointment or provided off-site.~~

~~10. Utility demand for sewer, water, electricity, garbage or natural gas shall not exceed normal residential levels.~~

~~11. Equipment or operation processes shall not be utilized which would produce or cause the emission of gases, dust, odors, vibration, electrical interference, smoke, noise, or light in a manner likely to cause offense or irritation to neighboring residents.~~

~~12. The home business(es) shall not use electrical or mechanical equipment that results in:~~

~~a. A change to the fire rating of the structure(s) used for the home business(es);~~

~~b. Visual or audible interference in radio or television receivers, or electronic equipment located off-premises; or~~

~~c. Fluctuations in line voltage at or beyond the property line.~~

~~13. There shall be no storage, distribution and/or production of toxic or flammable materials, nor spray painting or spray finishing operations that involve toxic or flammable materials, which in the judgment of the fire code official pose a dangerous risk to the residence, its occupants, and/or surrounding properties. An applicant shall make available the material safety data sheets, listing all potentially toxic and/or flammable materials associated with the home occupation, to the fire code official if requested for review.~~

~~F. One or more limited home business may be conducted in a residential dwelling as accessory uses, excepted as prohibited in EMC 18.100.070(C), Prohibited Activities; provided, that the limited home business shall:~~

~~1. Not have any employee, volunteer or other person engaged in the commercial activity on the site, other than residents of the dwelling.~~

~~2. Be operated in its entirety within the principal dwelling.~~

~~3. Not have a separate entrance from outside the building.~~

~~4. Not use any mechanical equipment except that which is used normally for purely domestic or household purposes.~~

~~5. Not utilize more than 25 percent of the total floor area of the living space of the dwelling. Areas within attached garages, unfinished basements and storage buildings shall not be considered living space for purposes of calculating allowable home business area but may be used for storage of goods associated with the limited home business.~~

~~6. Not show any evidence that a business is being conducted from the premises.~~

~~7. Not have any exterior signage that identifies the property as a business location.~~

~~8. Not allow clients or customers to visit the premises for any reason.~~

~~9. Not have any exterior storage of materials.~~

~~10. Each business must meet the requirement of Chapter 5.05 EMC, Business Licenses and Regulations.~~

~~G. Permit Revocation and Expiration.~~

~~1. The community development director or designee may revoke a home business permit if the conditions of approval have not been complied with and the home business is otherwise being conducted in a manner contrary to this title.~~

~~2. When a home business permit has been revoked due to violation of these standards, a minimum period of one year shall elapse before another application for a home business permit by the applicant(s) or member of the family residing on the subject property will be considered.~~

~~3. A home business permit shall become invalid if the applicant moves his or her residence.~~

~~H. An ongoing home business may be granted nonconforming status; provided, that it was previously permitted and has been in continuous operation since initial approval. The burden of providing a home business's nonconforming status rests with the property owner or tenant, pursuant to EMC 18.90.110. A home business which cannot prove nonconforming status shall be considered in violation of this section and shall cease until the appropriate approvals have been granted.~~

...



CITY OF EDGEWOOD STAFF REPORT PLANNING COMMISSION AGENDA ITEM

Date: June 8, 2026

Title: Schober Comprehensive Plan and Zoning Map Amendment (25-002-COMP PLAN)

Attachments:

- Attachment A. Existing Future Land Use Designation Map
- Attachment B. Applicant Proposed Future Land Use Map
- Attachment C. Applicant Submittal Materials
- Attachment D. Notice of Application Public Comments
- Attachment E. Applicant Proposed Industrial Use Limitations

Submitted By: Josh Kubitz, AICP – Planning Manager

Introduction and Policy Analysis:

In accordance with RCW 36.70A.130 of the Growth Management Act (GMA), cities may consider amendments to their comprehensive plans no more than once annually. The City of Edgewood City Council has established a process and criteria for making amendments to the City's Comprehensive Plan under EMC Chapter 18.60.

On February 24, 2026, the City Council approved the final annual docket via Resolution no. 26-0788. The resolution directed the Edgewood Planning Commission to review and consider the 25-002-COMP PLAN amendment application to rezone the Schober properties (5626 and 5628 Sumner Heights Dr E) to Industrial. The Edgewood Planning Commission was directed to complete its review, to conduct such public hearings as may be required, and to forward its recommendation to the Edgewood City Council prior to the deadline established in RCW 36.70A.130, as existing (December 31, 2026) or as amended.

Tentative Schedule:

February 10, 2026 – Planning Commission Public Hearing on Preliminary Docket

February 25, 2026 – City Council Resolution No. 25-0768 Final Docket

June 8, 2026 – Planning Commission Introduction and Discussion

June 28, 2026 – SEPA Issuance and Comment Period

July 13, 2026 – Planning Commission Public Hearing

August 10, 2026 – Planning Commission Discussion

September 14, 2026 – Planning Commission Recommendation

October 6, 2026 – City Council Study Session Introduction

October 27, 2026 – City Council Regular Meeting and Potential Action

Process and Criteria:

The process for amending the City Comprehensive Plan is specified in the Edgewood Municipal Code section 18.60 and in the state Growth Management Act (GMA) (RCW 36.70A) and the State Environmental Policy Act (SEPA). Only those amendments which are found to be in substantial compliance with all criteria listed below shall be approved (EMC 18.60.220.A):

1. Whether the proposed amendment(s) conform to the Growth Management Act (Chapter 36.70A RCW);
2. Whether the proposed amendment(s) are consistent with and implement the city's comprehensive plan, including the goals, policies and implementation strategies of the various elements of the plan;
3. Whether circumstances related to the proposed amendment(s) and/or the area in which it is located have substantially changed since the adoption of the city's comprehensive plan;
4. Whether the assumptions upon which the city's comprehensive plan is based are no longer valid, or whether new information is available which was not considered during the adoption process or any annual amendments of the city's comprehensive plan; and
5. Whether the proposed amendment(s) reflects current, widely held values of the residents of the city.

The applicant provided a detailed response to each of the above criteria provided in Attachment D.

Description of Proposal:

The following includes the applicant's proposal and the city's proposed alternative:

Applicant Proposal 25-001-COMP PLAN (Alternative 1): Redesignate the Comprehensive Plan Future Land Use Map and Current Zoning Map designations of Tax Parcels 0420234144 & 04202341111 (5626 and 5628 Sumner Heights Dr E) from Mixed Residential-1 (MR-1) to Industrial (I) (Exhibit B). The rezone is requested primarily to be consistent with the abutting Industrial zoned lands.

Public & Agency Comment:

Public comments were received during the notice of application which are contained in Exhibit D. The following summarizes the general comments:

- General noise, light, traffic, and air quality concerns,
- Incompatibility with surrounding neighborhood,
- Impact to existing residential property values,

There will be another comment period associated with the SEPA determination and Planning Commission Public Hearing to be completed later.

SEPA Environmental Review:

City staff are conducting an environmental review of the proposed comprehensive plan amendment and rezone alternatives. At this time, staff is likely to request the following SEPA mitigation measures:

- Type IV, 15-foot Solid Barrier landscaping is required between proposed industrial uses and Summer Heights Drive NW.
- Limit property access to both parcels to the existing 15-foot driveway along the southern property boundary of Tax Parcel 0420234144.
- Future non-residential development shall improve Summer Heights Drive East to current commercial standards between the access driveway and city boundary under SR 167.
- Future industrial development proposed within 500 feet of residentially zoned properties shall submit a project-specific Community Noise Impact Assessment demonstrating compliance with Edgewood Municipal Code (EMC) Chapter 8.20. This assessment shall evaluate stationary equipment, outdoor loading dock operations, and material handling areas. Applicants shall submit the study to the City prior to issuance of building permits. Additional conditions, such as landscape buffers, building orientation, and light shielding, may be applied during project-level design review to mitigate noise and visual impacts on adjacent residential properties.
- Prior to issuance of building permits for any future development resulting from this non-project action, the applicant shall submit a Design Review application to the City for administrative review and approval. The Design Review shall ensure coordinated development of access, stormwater management, landscaping, building orientation, and buffering measures to mitigate potential impacts to adjacent residential areas. The City may impose additional conditions at the Design Review stage to address site-specific impacts.

Current Discussion:

City staff are currently reviewing the application and are requesting additional direction from the Planning Commission. The following are points that city staff would like to discuss:

1. Applicant Revised Proposal:

Following a review of public comments, the applicant submitted a list of industrial uses to prohibit to reduce potential impacts. The most effective approach to include these limits in code would be to create an overlay district, which would restrict specific land uses and mandate compliance with the proposed SEPA mitigation measures.

Staff Question: Staff has reviewed the proposed prohibitions and agrees that limiting these industrial uses would mitigate potential impacts. Staff is interested in recommending an alternative version that further reduces the type of allowable industrial uses. Would the Planning Commission entertain an overlay that restricts certain types of industrial uses?

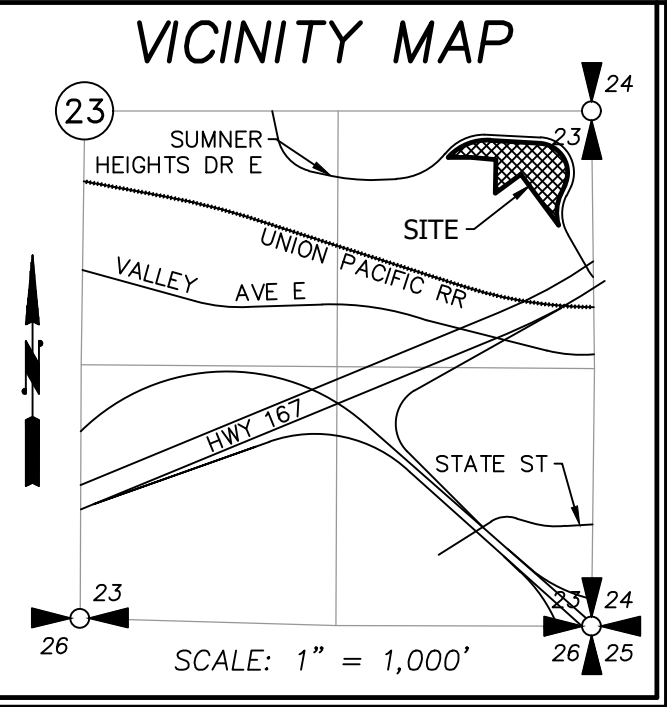
2. Industrial Land Use Table Review:

If staff is proposing an alternative with an overlay, staff will need to draft initial language for the SEPA and public hearing comment period. As such, staff is interested in reviewing the applicant's list with the Planning Commission and gathering general feedback on the various land uses.

Staff Question: What industrial land uses, if any, should staff evaluate to be prohibited or allowed in an overlay?

Staff Recommendation

The Planning Commission is invited to review the attached materials and provide feedback.



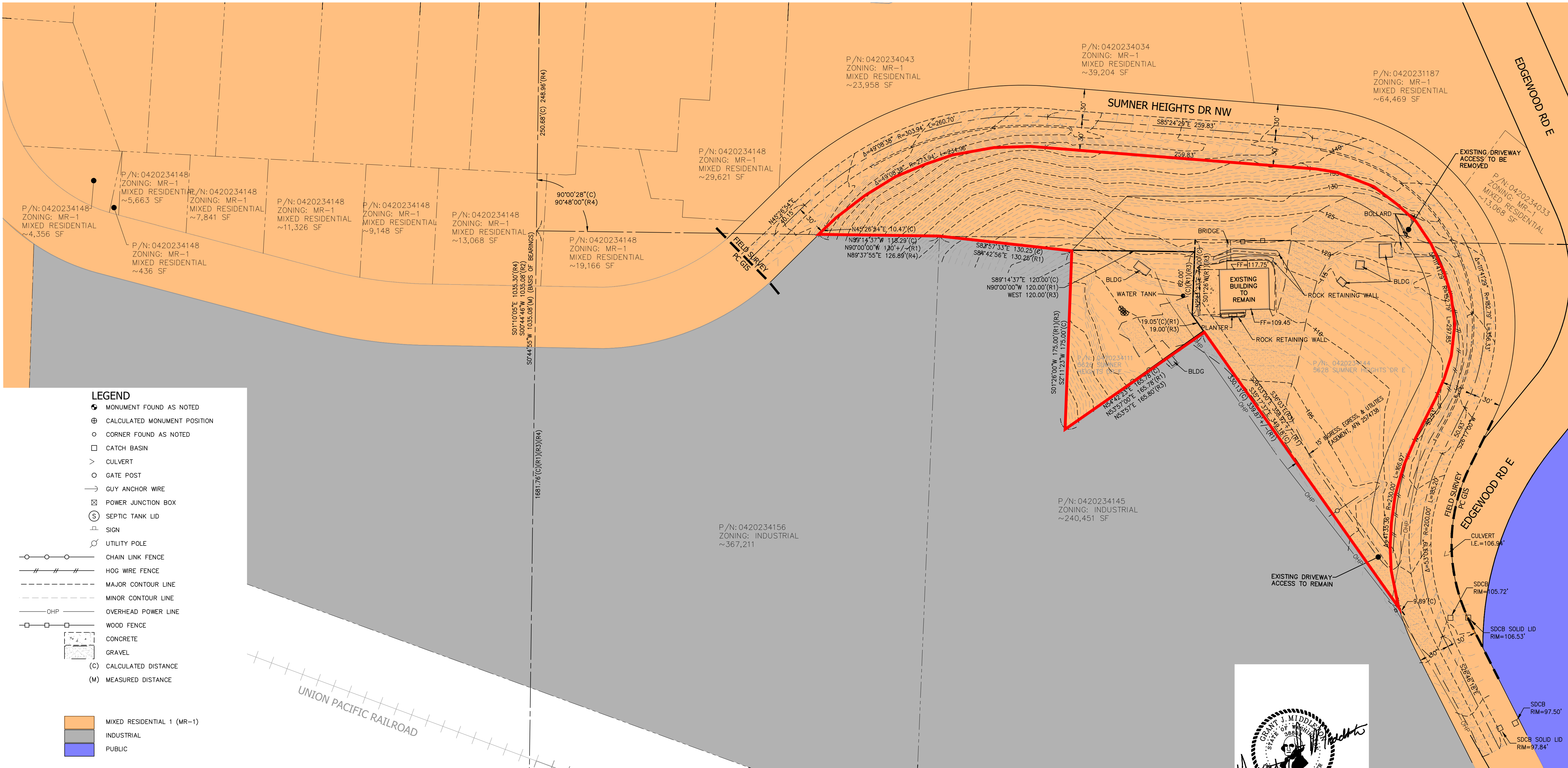
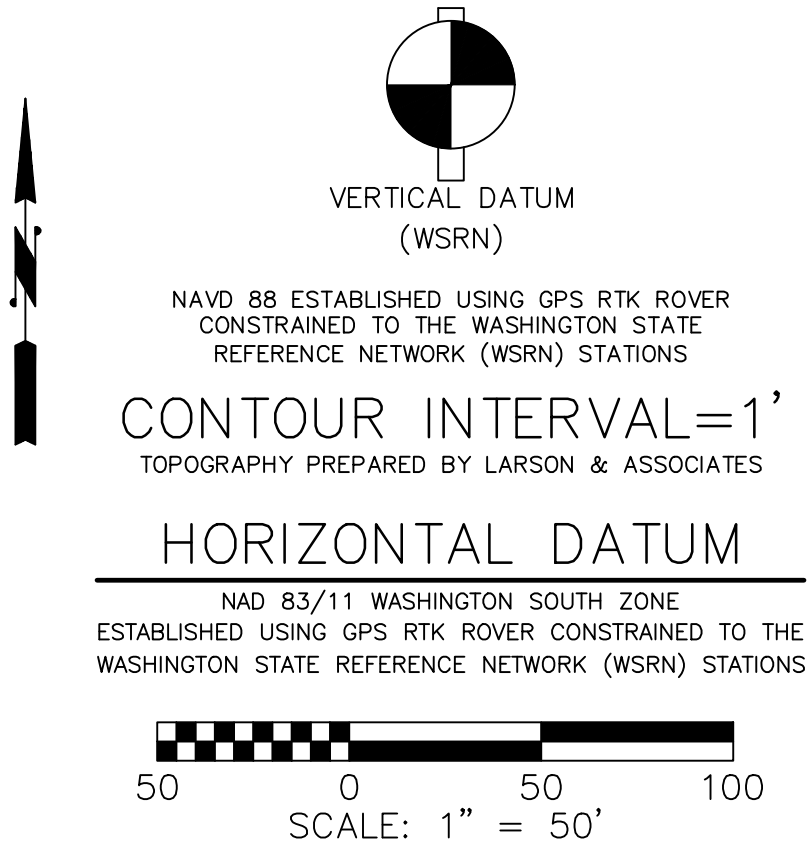
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LAND OWNER:	5626 SUMMER HEIGHTS LLC BROCK SCHOBER
SITE ADDRESS:	5626 AND 5628 SUMMER HEIGHTS DR E, EDGEWOOD, WA 98372
ASSESSOR'S PARCEL NO.:	0420234111 & 0420234144
SITE AREA:	109,571 SF (2.52 AC.)
LAND USE DESIGNATION:	MIXED RESIDENTIAL LDV
ZONING:	MIXED RESIDENTIAL (MR-1)
PROJECT LAND USE DESIGNATION:	INDUSTRIAL
PROPOSED ZONING:	INDUSTRIAL (I)
PROPOSED USE:	CONTRACTOR'S YARD

SCHOBER SITE PLAN

NE 1/4, SE 1/4, SEC.23, TWN.20 N., RNG. 4 E., W.M.

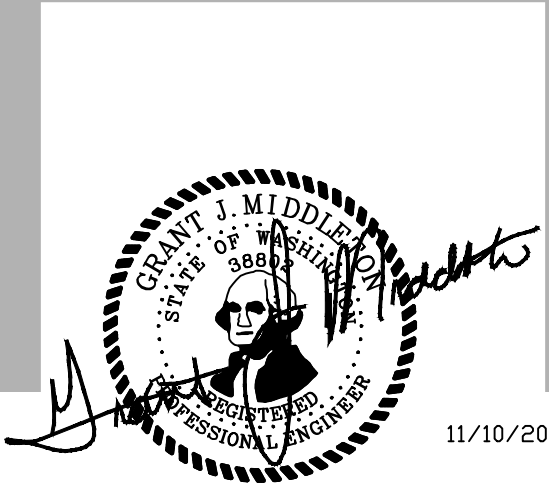
CITY OF EDGEWOOD, PIERCE COUNTY, WASHINGTON

EXISTING FUTURE LAND USE DESIGNATION MAP



- LEGEND
- MONUMENT FOUND AS NOTED
 - CALCULATED MONUMENT POSITION
 - CORNER FOUND AS NOTED
 - CATCH BASIN
 - CULVERT
 - GATE POST
 - GUY ANCHOR WIRE
 - POWER JUNCTION BOX
 - SEPTIC TANK LID
 - SIGN
 - UTILITY POLE
 - CHAIN LINK FENCE
 - HOG WIRE FENCE
 - MAJOR CONTOUR LINE
 - MINOR CONTOUR LINE
 - OHP
 - OVERHEAD POWER LINE
 - WOOD FENCE
 - CONCRETE
 - GRAVEL
 - (C) CALCULATED DISTANCE
 - (M) MEASURED DISTANCE

- MIXED RESIDENTIAL 1 (MR-1)
- INDUSTRIAL
- PUBLIC



11/10/2025

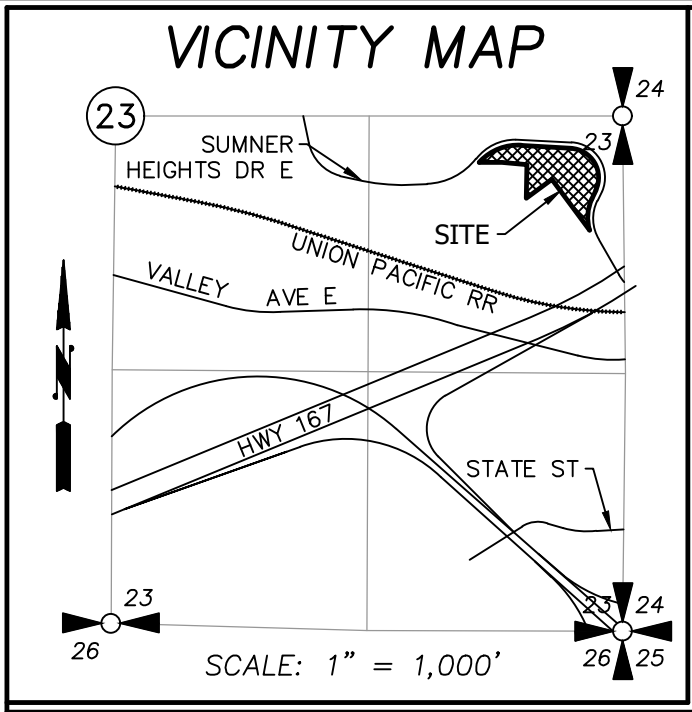
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HOR. 1"=50'	
VERT. N/A	
DESIGNED G.M.	
DRAWN MTP	
CHECKED G.M.	
PROPOSED:	BROCK SCHOBER 180 HANSON ROAD ELLENSBERG, WA 98926
CONTACT:	BROCK SCHOBER

LARSON and ASSOCIATES
surveyors, engineers & planners
9027 Pacific Avenue, Suite 4
Tacoma, WA 98444 (253) 474-3404

EXISTING FUTURE LAND USE DESIGNATION MAP

DATE	11/10/2025
DRAWING NO.	10251BASE
SHEET 1 OF 1	

CVR



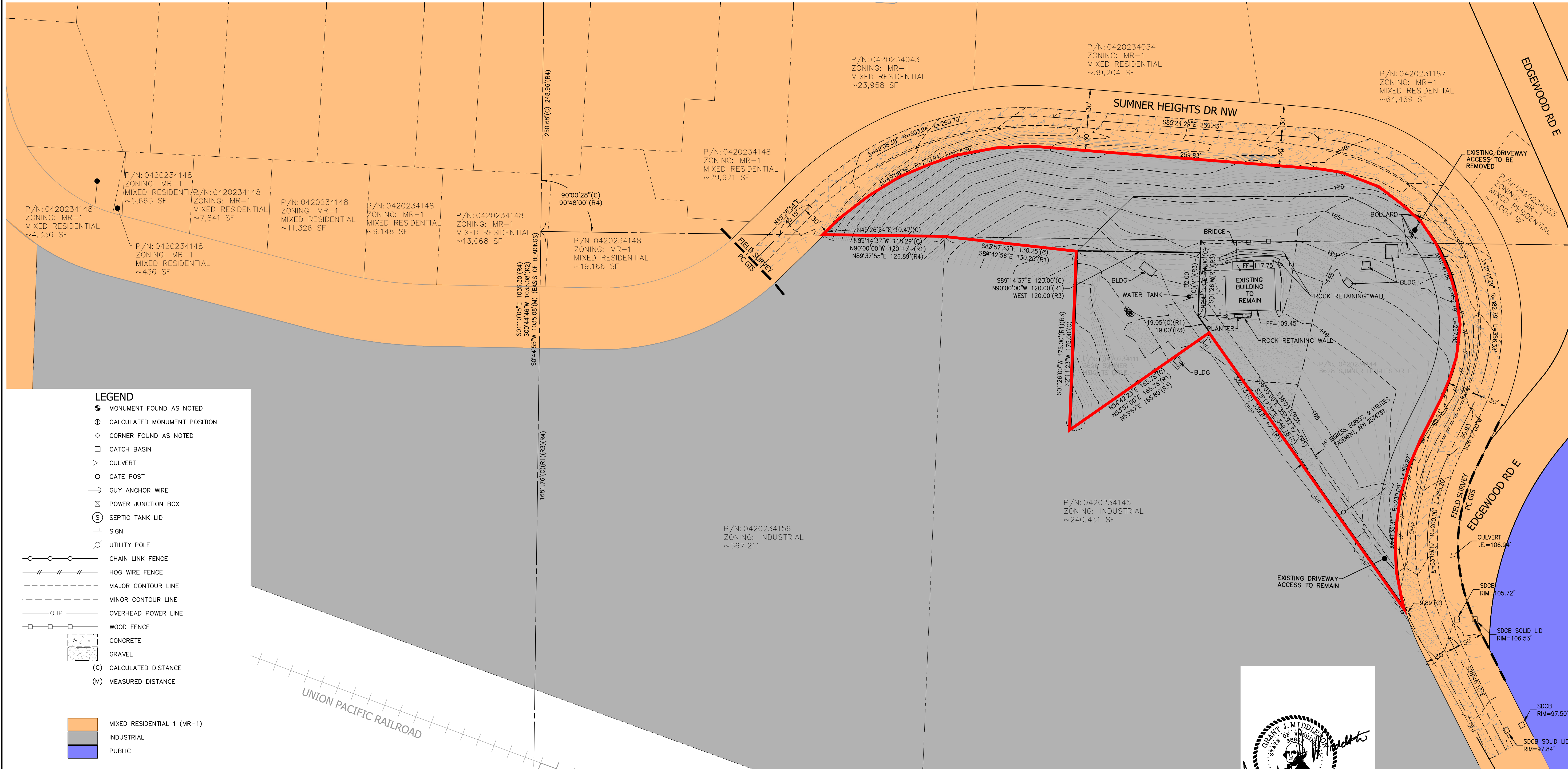
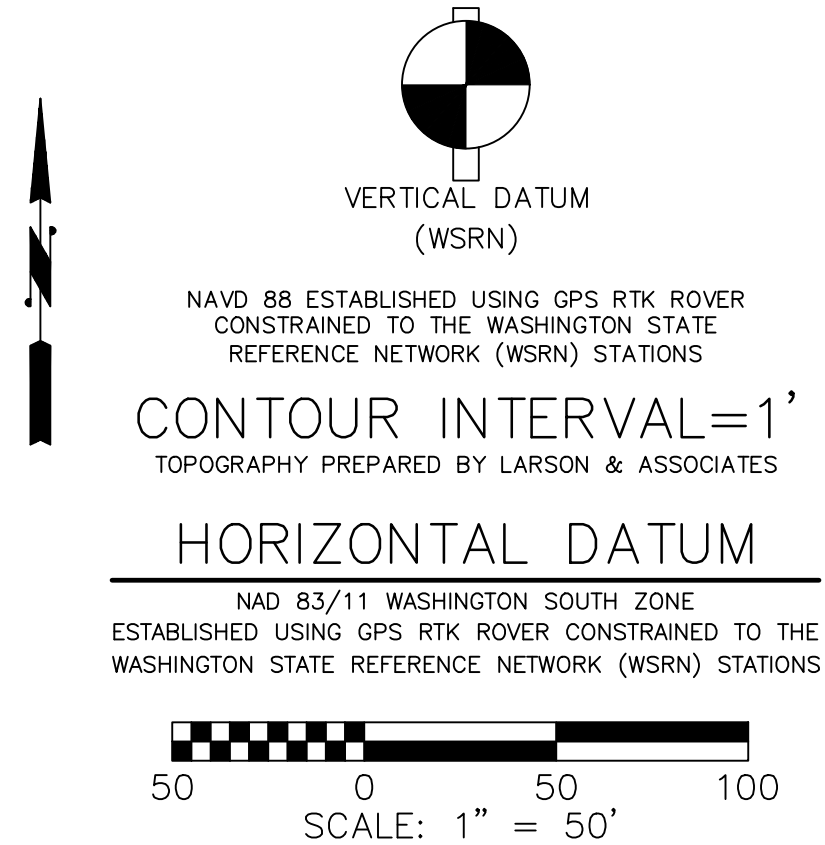
SITE DATA	
LAND OWNER:	5626 SUMNER HEIGHTS LLC BROCK SCHOB
SITE ADDRESS:	5626 AND 5628 SUMNER HEIGHTS DR E, EDGEWOOD, WA 98372
ASSESSOR'S PARCEL NO.:	0420234111 & 0420234144
SITE AREA:	109,571 SF (2.52 AC.)
LAND USE DESIGNATION:	MIXED RESIDENTIAL LDV
ZONING:	MIXED RESIDENTIAL (MR-1)
PROJECT LAND USE DESIGNATION:	INDUSTRIAL
PROPOSED ZONING:	INDUSTRIAL (I)
PROPOSED USE:	CONTRACTOR'S YARD

SCHOB SITE PLAN

NE 1/4, SE 1/4, SEC.23, TWN.20 N., RNG. 4 E., W.M.

CITY OF EDGEWOOD, PIERCE COUNTY, WASHINGTON

PROPOSED FUTURE LAND USE DESIGNATION MAP



LEGEND

- MONUMENT FOUND AS NOTED
- CALCULATED MONUMENT POSITION
- CORNER FOUND AS NOTED
- CATCH BASIN
- CULVERT
- GATE POST
- GUY ANCHOR WIRE
- POWER JUNCTION BOX
- SEPTIC TANK LID
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- MAJOR CONTOUR LINE
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- (C) CALCULATED DISTANCE
- (M) MEASURED DISTANCE

- MIXED RESIDENTIAL 1 (MR-1)
- INDUSTRIAL
- PUBLIC

JOB NUMBER	
10251	
SCALE	SCALE
HOR. 1"=50'	VERT. N/A
DESIGNED G.M.	MTF
DRAWN	CHECKED
PROPOSED FUTURE LAND USE DESIGNATION MAP	
PROPOSED FUTURE LAND USE DESIGNATION MAP	
DATE	
11/10/2025	
DRAWING NO.	
10251BASE	
SHEET 1 OF 1	
CVR	

LARSON and ASSOCIATES
surveyors, engineers & planners
9027 PACIFIC AVENUE, SUITE 4
TACOMA, WA 98444 (253) 474-3404

PROPOSED FUTURE LAND
USE DESIGNATION MAP

DATE
11/10/2025
DRAWING NO.
10251BASE
SHEET 1 OF 1

CVR

PLANNING AND LAND USE

Permit Application



SITE ADDRESS 5628 SUMNER HEIGHTS DR E, and 5626 SUMNER HEIGHTS DR E		
PARCEL NUMBER(S) 0420234144 and 0420234111		
APPLICANT Larson and Associates, Grant Middleton PE	PHONE 253-474-3404	EMAIL gmiddleton@rrlarson.com
ADDRESS 9027 Pacific Ave, Suite 4, Tacoma WA 98444		
PROPERTY OWNER(S) 5626 Sumner Heights LLC	PHONE 509-899-4506	EMAIL brock@m2industrial.com
ADDRESS 180 Hanson Road, Ellensburg WA 98926		
*Complete an <u>Owner Authorization form</u> for each applicable legal entity.		
PROJECT DESCRIPTION Comprehensive Plan Amendment proposing to amend the Future Land Use Designation Map from residential to industrial on two parcels. The current land use designation has been in effect for less than one (1) year for parcel 0420234111, and is simply requested to be returned to the previous land use designation of industrial. Parcel 0420234144 is an irregularly shaped three-sided property; two sides of which are bordered by existing Industrial Lands, with the long third-side being bordered by City right-of-way, Sumner Heights Drive East. Both parcels are proposed to revise the land use designation in order to be consistent with the abutting Industrial lands to the west and south and create a logical land use designation pattern on the north recognizing existing topographic elevations and using the right-of-way as the boundary/delineator between designations.		

By my signature, I certify that:

- I am the owner or have been granted authorization by the owner to submit this application; and
- I have reviewed all submittals for completeness and accuracy; and
- I have reviewed and am familiar with the applicable elements of the Edgewood Municipal Code (EMC); and
- I acknowledge my proposal shall not be approved unless the proposal conforms to those applicable elements the Edgewood Municipal Code (EMC), and the approval criteria for the subject application type.

Applicant Name:

LARSON AND ASSOCIATES

Applicant Signature:

[Signature]

Date:

12/26/25

ATTACHMENT A

Comprehensive Plan Amendment

Rationale & Site-Specific Responses

Preparation of a rationale for the proposal

1. Explain the reason for this amendment proposal.

REPOSNE: The current land use designation has been in effect for less than one (1) year for parcel 0420234111, and is simply requested to be returned to the previous land use designation of industrial. Parcel 0420234144 is an irregularly shaped three-sided property; two sides of which are bordered by existing Industrial Lands, with the long third-side being bordered by City right-of-way, Sumner Heights Drive East. Both parcels are proposed to revise the land use designation in order to be consistent with the abutting Industrial lands to the west and south and create a logical land use designation pattern on the north recognizing existing topographic elevations and using the right-of-way as the boundary/delineator between designations.

2. Was this proposed amendment denied during a previous Comprehensive Plan Amendment review cycle? If so, briefly explain why (if known).

REPOSNE: No.

3. Explain how the proposed amendment advances the goals and policies of the Comprehensive Plan.

REPOSNE: The proposed amendment advances the goals and policies of the Comprehensive Plan. The applicant believes the goals and policies are supportive and consistent with the proposed amendment to revise the land use designation:

Table I-1. Plan Contents

LAND USE ELEMENT

ELEMENT FOCUS: *Land use classifications to meet projected growth, land use patterns, compatibility, sense of place, environmental protection, healthy living, equitable land use decisions, site and building design, vegetation and landscaping, public spaces, neighborhood character, and historic preservation*

Goal LU.1 *Establish a future land use pattern that is consistent with the City's vision.*

LU.1a *Ensure that adequate land areas are provided to accommodate projected growth and provide opportunities for economic development activities, while protecting open space and natural resources.*

LU.1b *Use the Future Land Use Map that is adopted as part of this plan to guide land use and development regulations, and update it as needed (Figure LU-3).*

The City is planning to study the feasibility of changing land use designations in the Special Land Use Study Overlay shown on the Future Land Use Map (Figure LU-3). A number of factors have led to interest in possible redesignation of land uses (together with zoning and allowed uses) in the overlay areas.

LU.1q The Industrial designation is intended to accommodate industrial uses providing local and regional employment opportunities, such as research, light manufacturing and warehousing. Compatible uses are also allowed.

Goal LU.2 Promote a land use pattern that strengthens Edgewood's identity and sense of place.

LU.2b Promote community character and identity, in a welcoming way, including consideration of the following:

- *Compatibility with natural site characteristics*
- *Development at a scale and character appropriate to the site and surrounding vicinity*
- *Design that reflects the community's current and historic character with a small-town feeling*
- *Landscaping to enhance building and site appearance*

Goal LU.11 Accommodate and facilitate industrial development that positively contributes to Edgewood's economy and character.

LU.11a Establish opportunities for a range of industrial uses, such as regional research, manufacturing, warehousing or other regional employment uses.

LU.11b Expand the number and type of industrial uses in the City through more intensive use of existing industrial lands and expansion of industrial uses in appropriate locations.

Goal LU.15 Ensure that land use decisions are fair and equitable.

4. Does the proposed amendment have a relationship to any other City codes or regulations?

REPOSNE: In addition to the comprehensive plan land use designation revision to industrial, the applicant is also concurrently seeking the approval of a rezone to Industrial. Otherwise, the Comprehensive Plan is a policy and goal document, which creates the framework for the adoption of City codes and regulations that are required to implement the general goals and vision of the city's comprehensive plan.

5. What are the cumulative effects of this proposed amendment to the Comprehensive Plan?

REPOSNE: The Comprehensive Plan is a policy and goal document. As such, there are no cumulative effects directly anticipated as a result of the proposed comprehensive plan amendment. Any future development of the site, under any land use designation and/or implementing zoning designation, will be required to comply with all applicable City development standards and critical area requirements to effectively address and mitigate potential environmental impacts.

ATTACHMENT B

Comprehensive Plan Amendment

Evaluation Criteria & Site-Specific Responses

Evaluation Criteria per [EMC 18.60.220](#)

1. How does the proposed amendment conform to the Growth Management Act (36.70A RCW)?

REPOSNE: The proposed amendment will conform to the Growth Management Act, 36.70A RCW; the proposal will be processed, reviewed and approved by the city, Puget Sound Regional Council and the Washington State Department of Commerce pursuant to the requirements of the GMA.

2. Describe how the proposed amendment is consistent with and implements the city's comprehensive plan, including the goals, policies and implementation strategies of the various elements of the plan.

REPOSNE: The proposed amendment advances the goals and policies of the Comprehensive Plan. The applicant believes the goals and policies are supportive and consistent with the proposed amendment to revise the land use designation:

Table I-1. Plan Contents

LAND USE ELEMENT

ELEMENT FOCUS: Land use classifications to meet projected growth, land use patterns, compatibility, sense of place, environmental protection, healthy living, equitable land use decisions, site and building design, vegetation and landscaping, public spaces, neighborhood character, and historic preservation

Goal LU.1 Establish a future land use pattern that is consistent with the City's vision.

LU.1a Ensure that adequate land areas are provided to accommodate projected growth and provide opportunities for economic development activities, while protecting open space and natural resources.

LU.1b Use the Future Land Use Map that is adopted as part of this plan to guide land use and development regulations, and update it as needed (Figure LU-3).

The City is planning to study the feasibility of changing land use designations in the Special Land Use Study Overlay shown on the Future Land Use Map (Figure LU-3). A number of factors have led to interest in possible redesignation of land uses (together with zoning and allowed uses) in the overlay areas.

LU.1q The Industrial designation is intended to accommodate industrial uses providing local and regional employment opportunities, such as research, light manufacturing and warehousing. Compatible uses are also allowed.

Goal LU.2 Promote a land use pattern that strengthens Edgewood's identity and sense of place.

LU.2b Promote community character and identity, in a welcoming way, including consideration of the following:

- *Compatibility with natural site characteristics*
- *Development at a scale and character appropriate to the site and surrounding vicinity*
- *Design that reflects the community's current and historic character with a small-town feeling*
- *Landscaping to enhance building and site appearance*

Goal LU.11 Accommodate and facilitate industrial development that positively contributes to Edgewood's economy and character.

LU.11a Establish opportunities for a range of industrial uses, such as regional research, manufacturing, warehousing or other regional employment uses.

LU.11b Expand the number and type of industrial uses in the City through more intensive use of existing industrial lands and expansion of industrial uses in appropriate locations.

Goal LU.15 Ensure that land use decisions are fair and equitable.

3. Describe whether circumstances related to the proposed amendment(s) and/or the area in which it is located have substantially changed since the adoption of the city's comprehensive plan.

REPOSE: With the adoption of the 2024 Comprehensive Plan update, the current land use designation has been in effect for less than one (1) year for parcel 0420234111, and is simply being proposed to revise the land use designation and return it to industrial. Parcel 0420234144 is an irregularly shaped three-sided parcel with two sides bordered by existing Industrial Lands, and the third side bordered by City right-of-way, Sumner Heights Drive East. The land use designation for both parcels are proposed to be updated to be consistent with the abutting Industrial lands to the west and south and create a logical land use designation pattern using the right-of-way as the boundary and the physical delineator between designations. Question 3 presumes the need for a change in circumstances and that the current land use designation is not in oversight having a documented history for the 2024 revision at this location. In this case, the applicant believes an oversight was made with the adoption of the 2024 amendments modifying the land use designation for parcel 0420234111 and not updating the land use designation for parcel 0420234144 in order to create a logical industrial land use designation pattern recognizing the both the topographic elevations and using the right-of-way as the boundary and physical delineator between land use designations.

4. Explain how the assumptions upon which the city's comprehensive plan is based are no longer valid, or whether new information is available which was not considered during the adoption process or any annual amendments of the city's comprehensive plan.

REPOSE: Question 4 presumes the current land use designation is not in oversight and has a documented history clearly identifying the assumptions made to document and support the 2024 Comprehensive Plan revision at this location. In this case, the applicant believes an oversight was made with the adoption of the 2024 amendments modifying the land use designation for parcel 0420234111 and not updating the land use designation for parcel 0420234144 in order to create a logical industrial land use designation pattern recognizing both the topographic elevations and using the right-of-way as the boundary and physical delineator between land use designations.

5. Does the proposed amendment reflects current, widely held values of the residents of the city?

REPOSE: The proposal is consistent with and is reflective of the widely held values of city residents, which are articulated through the various comprehensive plan elements. For example, the

proposal will be reflective of the area land use patterns; it will be compatible in the neighborhood given the unique physical characteristics of the area; it will contribute to the sense of place when developed, including extensive landscaping and tree retention; it will fully comply with all applicable environmental requirements in order to conserve and protect the functions and values of critical areas; and will be supportive of healthy living within the city. The amendment proposal will be supportive of the community's social and economic health by supporting and sustaining the city's small-town character, ambiance and charm.

For Site-Specific Proposals (must be answered in addition to Questions 1-5)

6. Does the proposed site-specific amendment meet concurrency requirements for transportation and does not adversely affect adopted level of service standards for other public facilities and services, e.g., police, fire and emergency medical services, parks, fire flow and general governmental services (NOTE: additional studies or informative requests from outside agencies may be required in order to fully respond to this question)?

REPOSE: Yes, the proposal meets concurrency requirements for transportation and does not adversely affect adopted level of service standards for other public facilities and services. The applicant has provided a Trip Generation Assessment that has been reviewed and approved by City Staff with a determination that the project falls below the threshold and is exempt from traffic concurrency.

7. Will the proposal result in probable significant adverse impacts to the city's transportation network, capital facilities, utilities, parks, or environmental features that cannot be mitigated?

REPOSE: No; the proposal will not have significant adverse impacts to the transportation network, capital facilities, utilities, parks, or environmental features that cannot be mitigated. Any future development of the site, under any land use designation and/or implementing zoning designation, will be required to comply with all applicable City development standards and critical area requirements to effectively address and mitigate potential impacts.

8. Is the subject parcel(s) physically suitable for the requested land use designation and the anticipated land use development, including, but not limited to, the following:

a. Access;

REPOSE: Yes, the site is physically suitable regarding access for the requested land use designation. The proposal will eliminate the northern most access and utilize only the southern access. The applicant has had a traffic engineer review the proposal and provide a Trip Generation Assessment that has been reviewed and approved by City Staff.

b. Provision of utilities; and

REPOSE: Yes, the site is physically suitable for the requested land use designation. The proposal will be provided with all of the necessary utilities needed to support future development.

c. Compatibility with existing and planned surrounding land uses?

REPOSE: Yes, the site is physically suitable for the requested land use designation. The proposal will create a logical boundary between the northern residential and the southern industrial land use designations. The existing topographic elevations of the upper properties north, the lower proposal

site and the Sumner Heights Drive East ROW substantially create physical separation. Given the existing physical characteristics of this area naturally creating physical separation between the uses on the north and south side of the right-of-way, the use of Sumner Heights Drive East as the boundary only makes sense as the physical delineator between land use designations.

9. Will the request create pressure to change the land use designation of other properties?

REPONSE: No. The properties to the south already have an industrial land use designation and are zoned industrial; the area properties to the north have existing development that is separated by an existing right-of-way. The northern properties are across Sumner Height Drive East and are visually separated by vegetation as well as being physically separated by elevated topographically above the proposal area.

10. Does the proposed amendment materially affect the land use and population growth projections that are the bases of the comprehensive plan?

REPONSE: Re-establishing .36 acres and modifying 2.11 acres to the industrial land use designation will not materially affect the land use and population growth projections.

11. Does the proposed amendment materially affect the adequacy or availability of urban facilities and services to the immediate area and the overall UGA?

REPONSE: Re-establishing .36 acres and modifying 2.11 acres to the industrial land use designation will not materially affect the adequacy or availability of urban facilities and services to the immediate area.

12. Is the proposed amendment consistent with applicable county-wide policies or any other applicable interjurisdictional policy or agreement, and all applicable local, state, or federal laws?

REPONSE: The proposed amendment will conform to the applicable county-wide planning policies; the proposal will be processed, reviewed and approved by the city, Puget Sound Regional Council and the Washington State Department of Commerce pursuant to the requirements of the GMA.

Date: December 5, 2025

To: City of Edgewood

From: Aaron Van Aken, P.E., PTOE
Heath & Associates

Subject: Schober Contractor Yard
Trip Generation Assessment

Heath & Associates has been retained to prepare a Trip Generation Assessment for the proposed Schober Contractor Yard project, herein referenced to as the project. The intent of this assessment is to provide the city with traffic estimates for a new commercial development for their review.

1. PROJECT DESCRIPTION

Schober Contractor Yard is a proposed commercial development located to the south of Sumner Heights Drive E in Edgewood and will support storage of construction equipment, tractor trailers with short trailers, and pickup trucks. The subject site, located at 5626/5628 Sumner Heights Drive E, consists of two parcels totaling approximately 2.47 acres and is currently occupied by a 1,936-square foot (sf) single-family home which will be repurposed into the site office building. Due to on-site topographical constraints, only ~1.67-acres will be usable for contractor storage area.

The site is currently zoned Mixed Residential (MR-1) by the City of Edgewood and is proposing a rezone to an Industrial designation. It is bordered by industrial development to the south and by Sumner Heights Drive E to the north and east.

Site access currently exists via two driveways extending west and northwest from Sumner Heights Drive E. As a part of the project, the existing northernmost access will be eliminated while the southernmost driveway will remain.

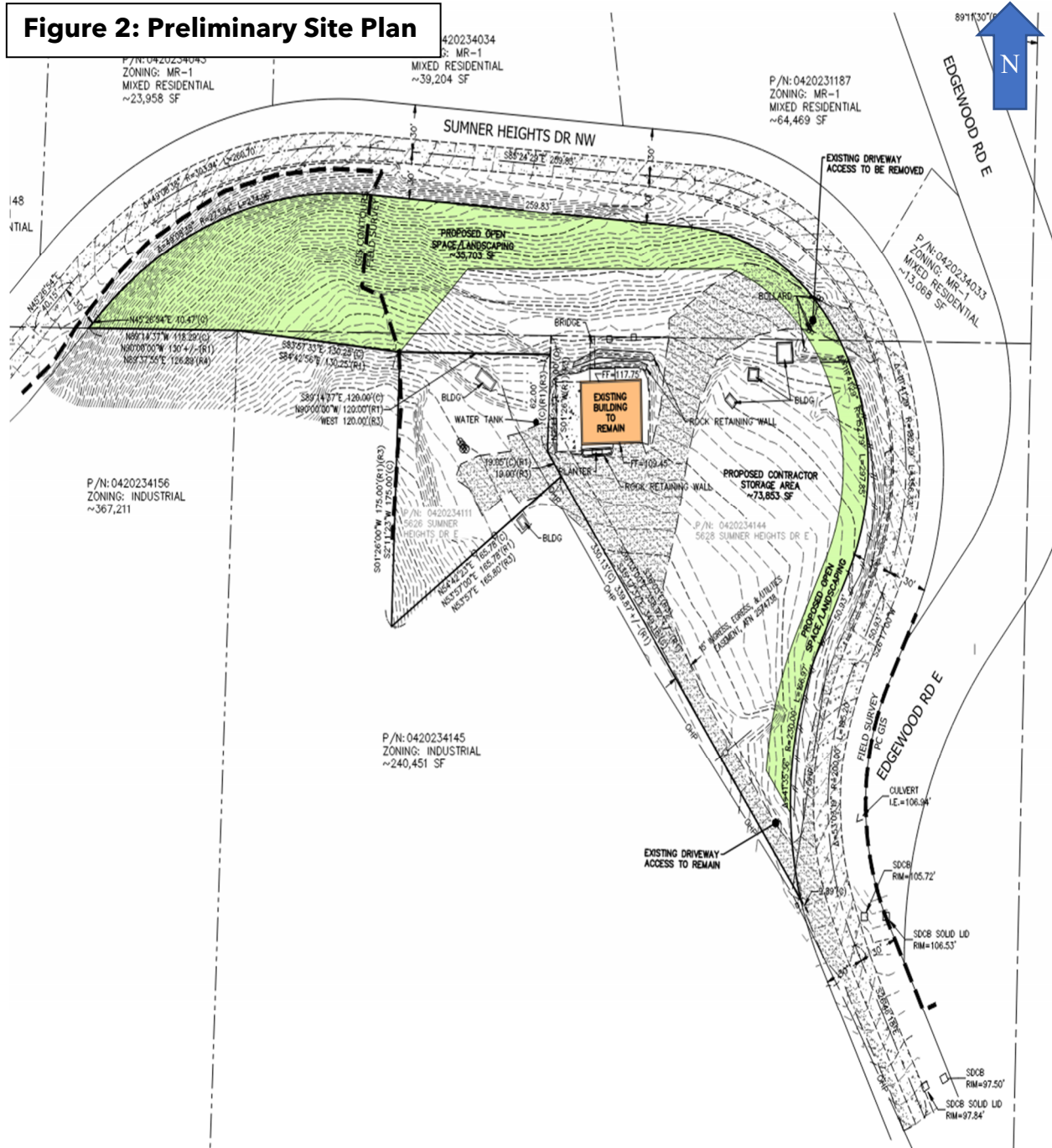
A vicinity map is provided in **Figure 1**. A conceptual site plan is provided in **Figure 2**.



Figure 1: Vicinity Map



Figure 2: Preliminary Site Plan



The conceptual site plan is illustrated above. As shown, most of the northern portion of the property will remain as open space. The 1.67-acre contractor storage yard is located on the east side of the site, with access provided at the south end of the property.



2. PROJECT TRIP GENERATION

Trip generation estimates were derived from the Institute of Transportation Engineers (ITE) *Trip Generation*, 12th Edition. The proposed use is most consistent with ITE Land Use Code (LUC) 180 - Specialty Trade Contractor with square footage used as the input variable. The existing single-family dwelling unit will be converted into a site office and can be deducted from the proposed trip generation. The previous use utilized LUC 210 - Single-Family Detached Housing. The project trip generation forecast is summarized in **Table 2**.

Table 2: Project Trip Generation

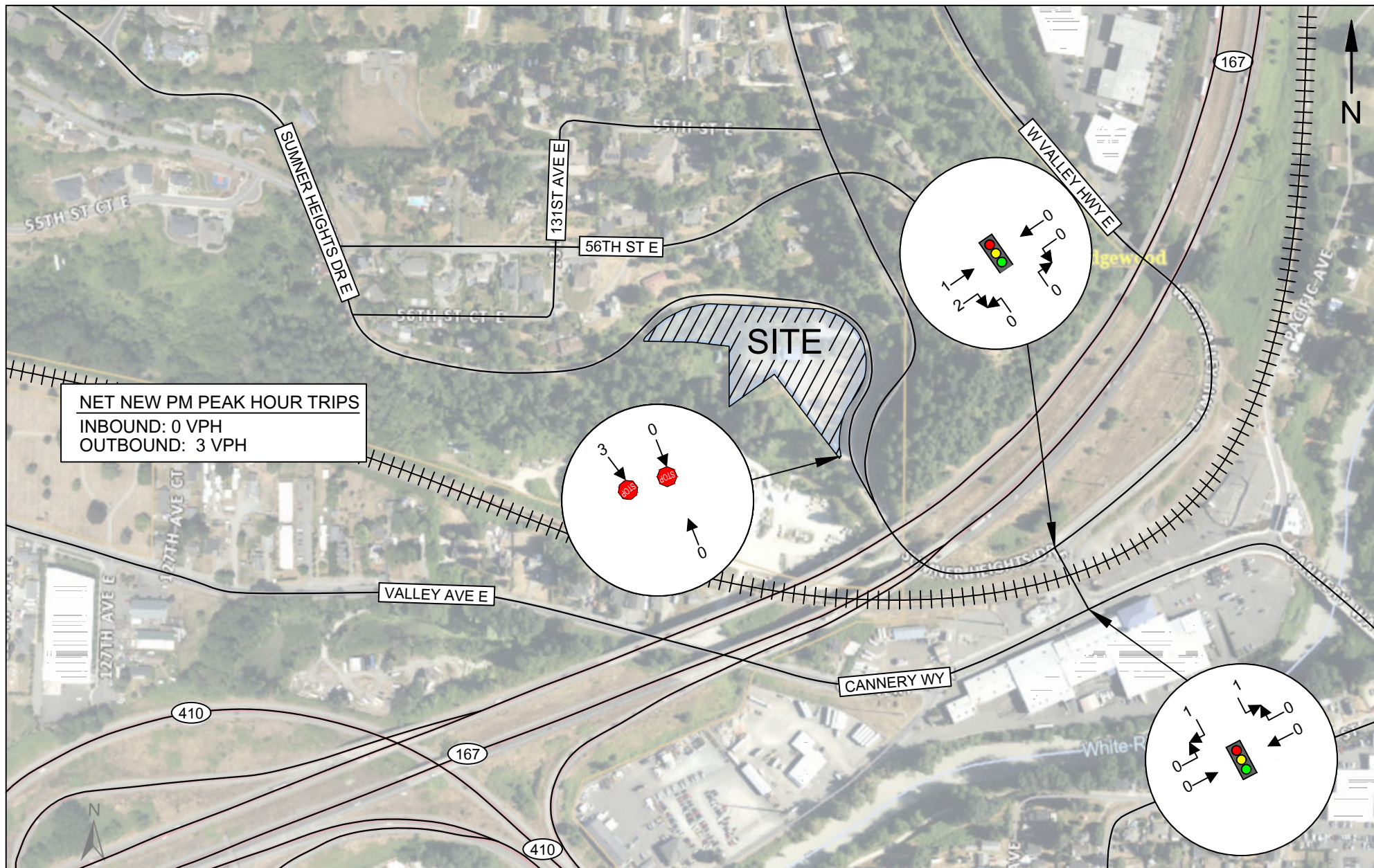
Land Use	Units	AWDT	AM Pk Hr Trips			PM Pk Hr Trips		
			In	Out	Total	In	Out	Total
Specialty Trade Contractor (LUC 180)	1.94-ksf	19	2	1	3	1	3	4
Single-Family Detached (LUC 210)	1 DU	-9	-0	-1	-1	-1	-0	-1
Net New Trips		10	2	0	2	0	3	3

The project is estimated to generate 10 net new weekday daily trips, 2 net new AM peak hour trips (2 inbound / 0 outbound), and 3 net new PM peak hour trips (0 inbound / 3 outbound).

3. PROJECT TRIP DISTRIBUTION & ASSIGNMENT

Project-generated trips were distributed and assigned to the vicinity street network based on a review of site use and proximity to major roadways/highways in the area. The preliminary PM peak hour trip distribution & assignment forecast is shown in **Figure 3** and is subject to adjustments based on the City's concurrency model.





4. CONCLUSION

The Schober Contractor Yard is a proposed contractor storage yard at 5626/5628 Sumner Heights Drive E in the City of Edgewood. The project will repurpose an existing 1,936-sf single family residence into an on-site office. Approximately 1.67-acres of the 2.47-acre site will be used to store construction equipment, small tractor trailers and pickup trucks.

The property is currently zoned as MR-1 Mixed Residential and is proposing a rezone to Industrial to support the intended use. As part of the project, one of the two existing accesses will be eliminated, with the southernmost access point remaining in use.

Traffic impacts are expected to be minimal, with the development generating approximately 10 net new weekday daily trips, including 2 net new trips in the AM peak hour and 3 net new trips during the PM peak hour.

Please reach out with any questions or requests for further analysis.



SCHOBER CONTRACTOR YARD TRIP GENERATION ASSESSMENT

APPENDIX



Specialty Trade Contractor (180)

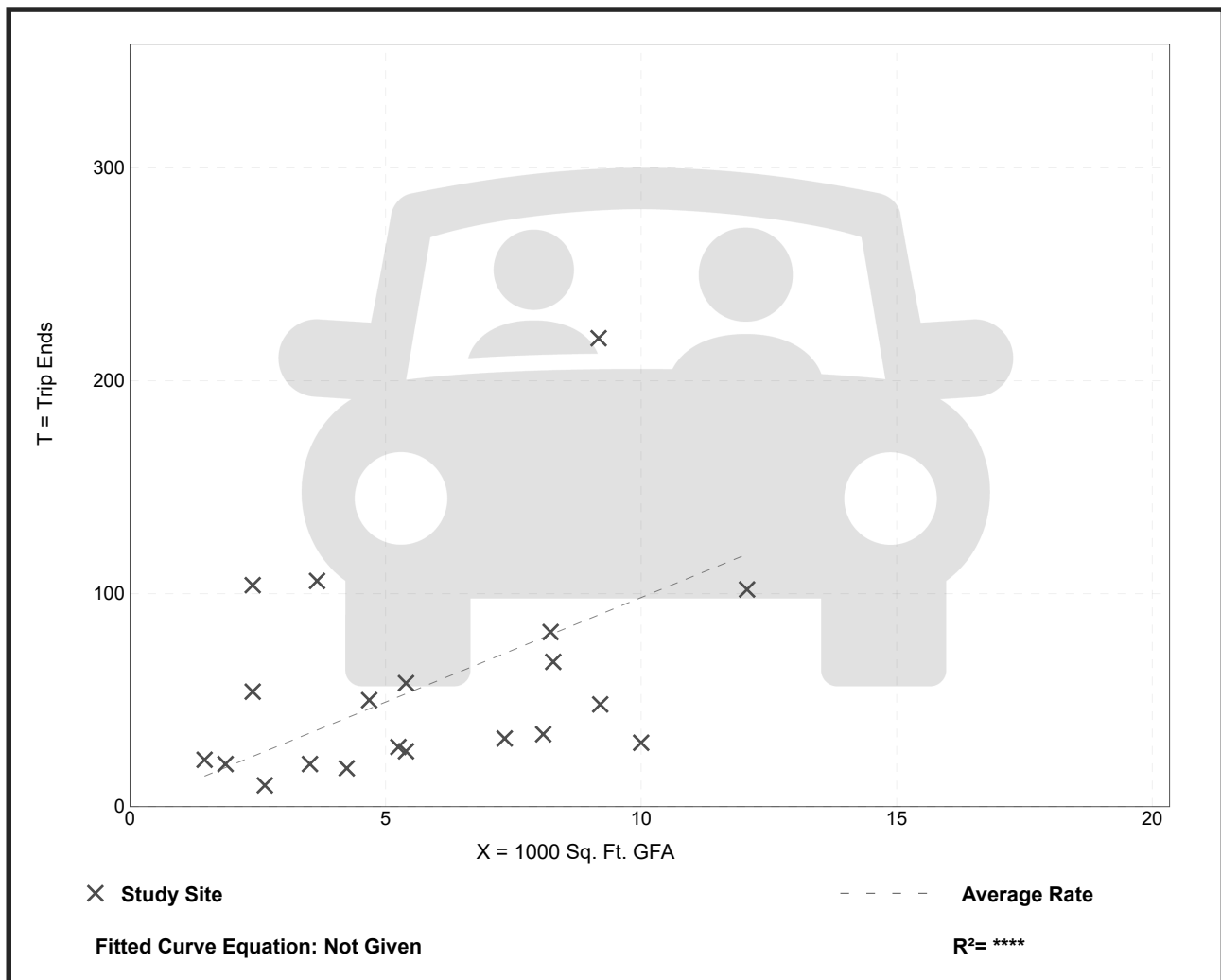
Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 20
Avg. 1000 Sq. Ft. GFA: 6
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
9.82	3.00 - 43.33	8.56

Data Plot and Equation



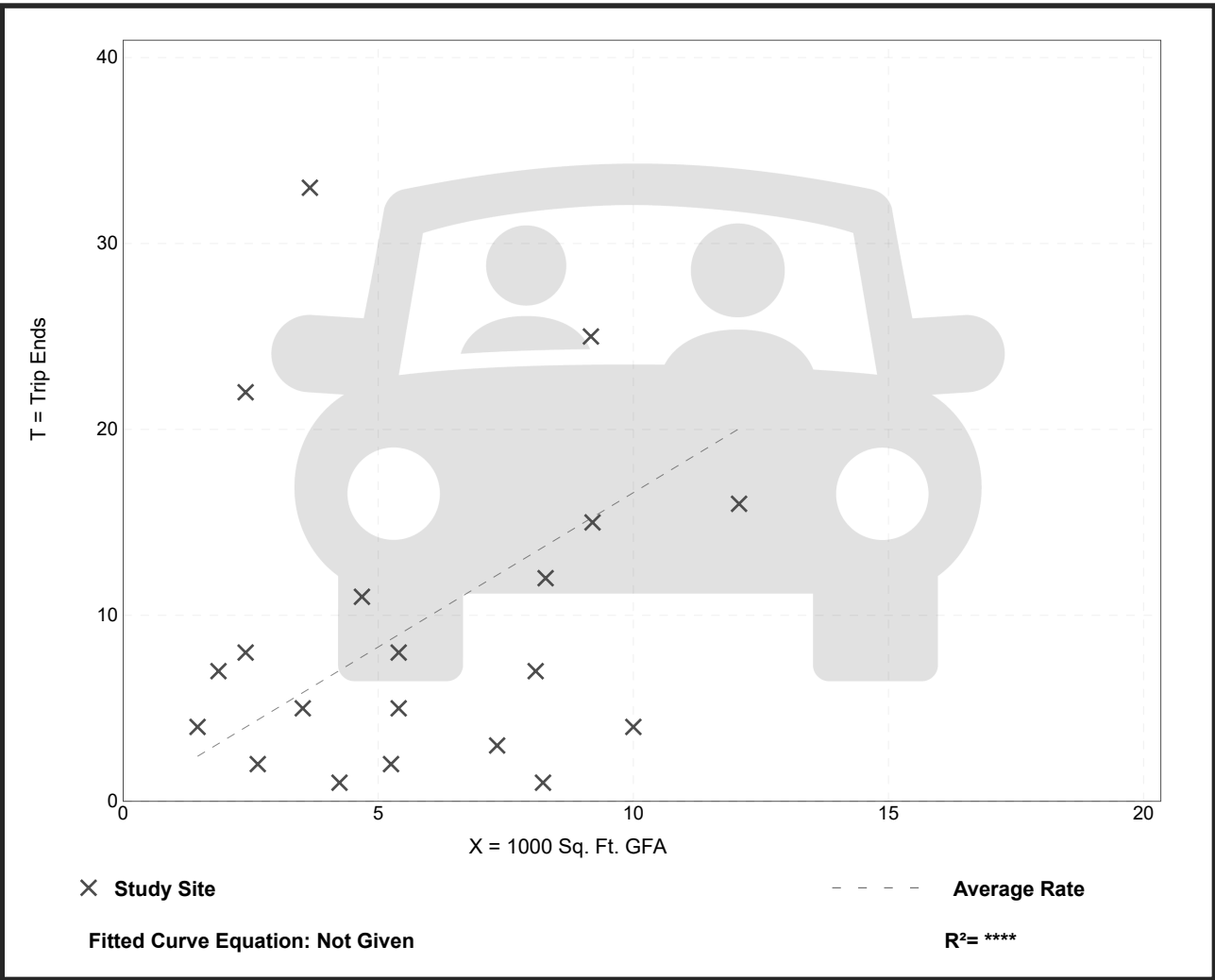
Specialty Trade Contractor (180)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.
Setting/Location: General Urban/Suburban
Number of Studies: 20
Avg. 1000 Sq. Ft. GFA: 6
Directional Distribution: 74% entering, 26% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
1.66	0.12 - 9.17	2.00

Data Plot and Equation



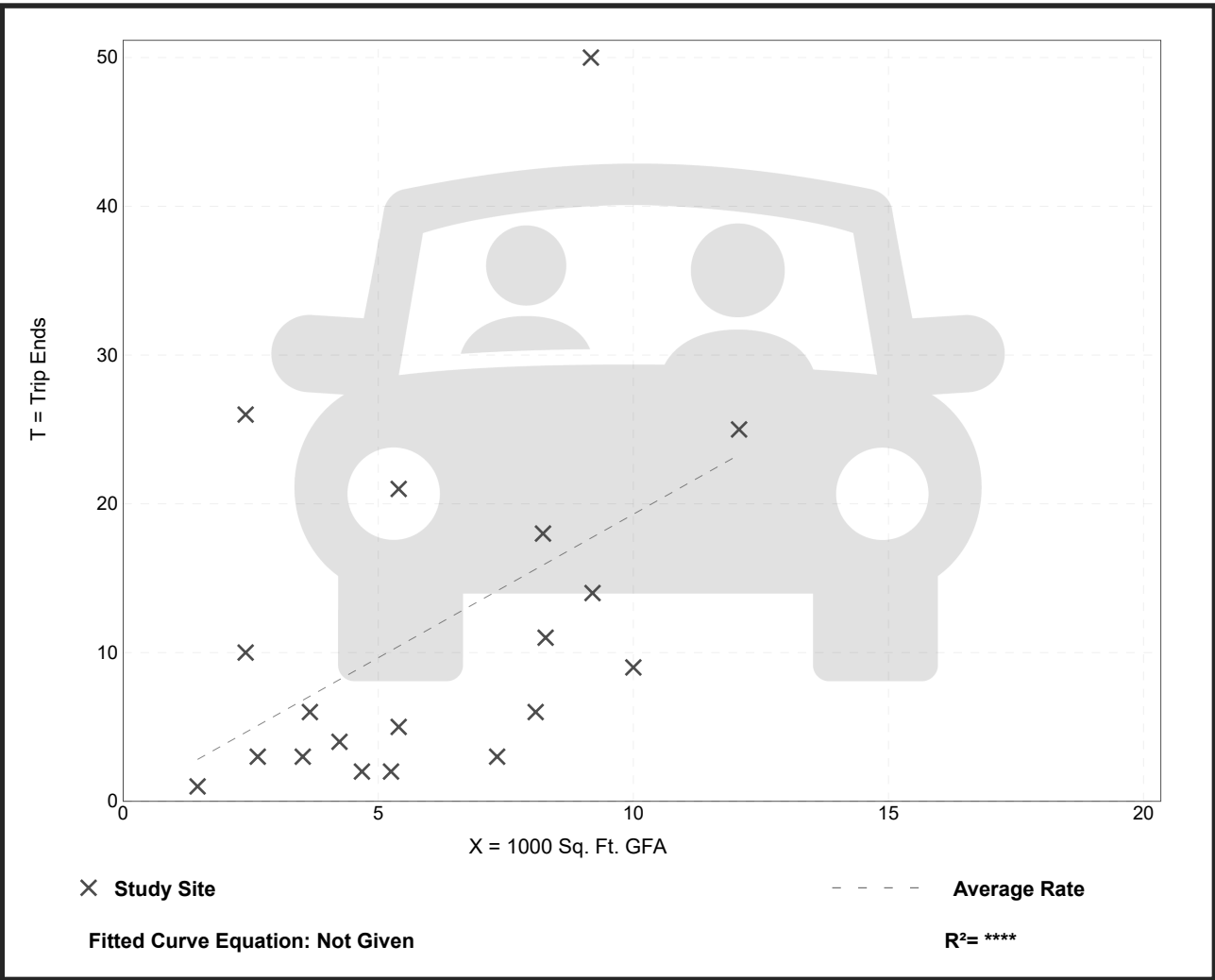
Specialty Trade Contractor (180)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: General Urban/Suburban
Number of Studies: 19
Avg. 1000 Sq. Ft. GFA: 6
Directional Distribution: 32% entering, 68% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
1.93	0.38 - 10.83	1.98

Data Plot and Equation



Single-Family Detached Housing (210)

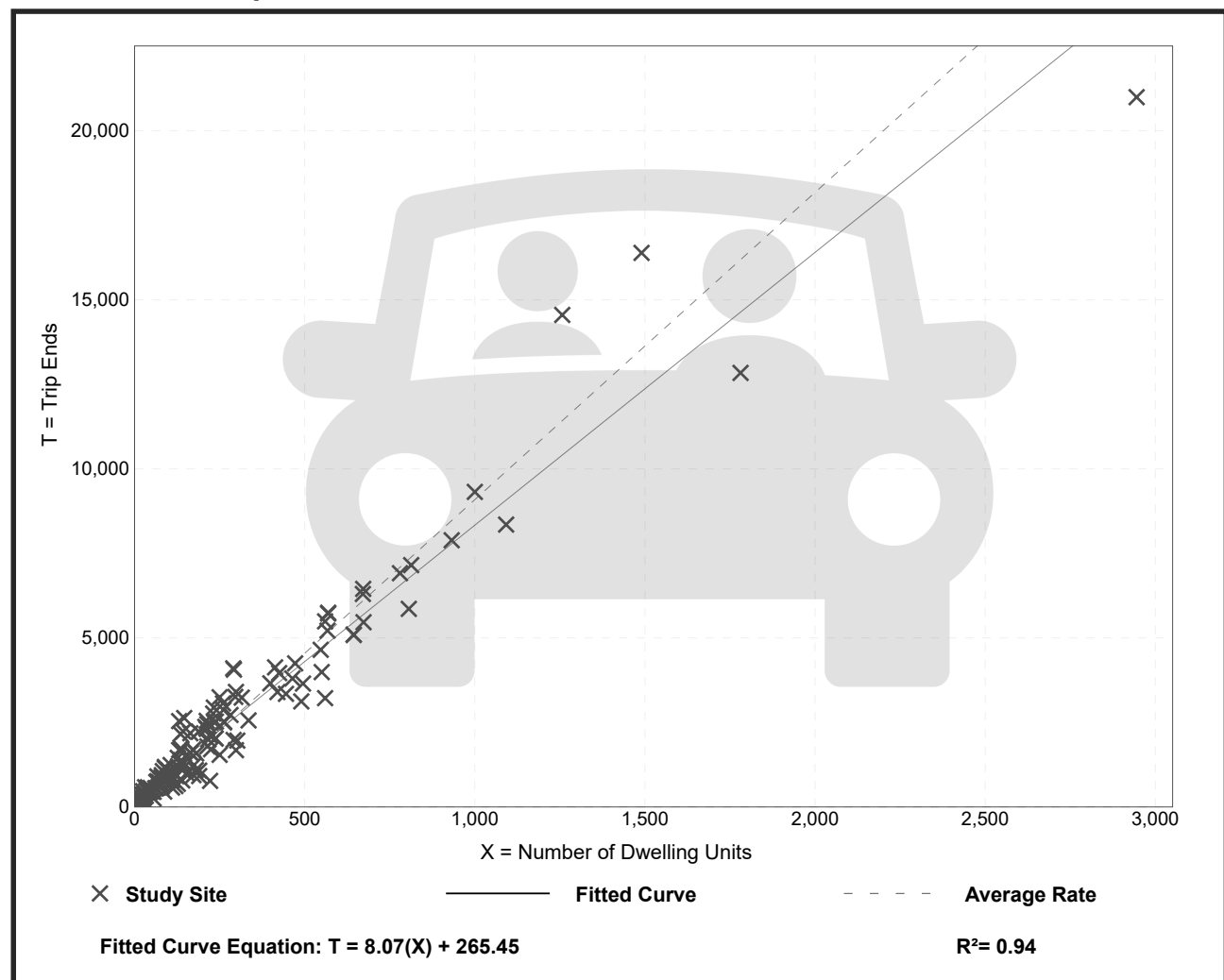
Vehicle Trip Ends vs: Dwelling Units
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 155
Avg. Num. of Dwelling Units: 261
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
9.09	3.47 - 23.80	2.29

Data Plot and Equation



Single-Family Detached Housing (210)

Vehicle Trip Ends vs: Dwelling Units

On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 153

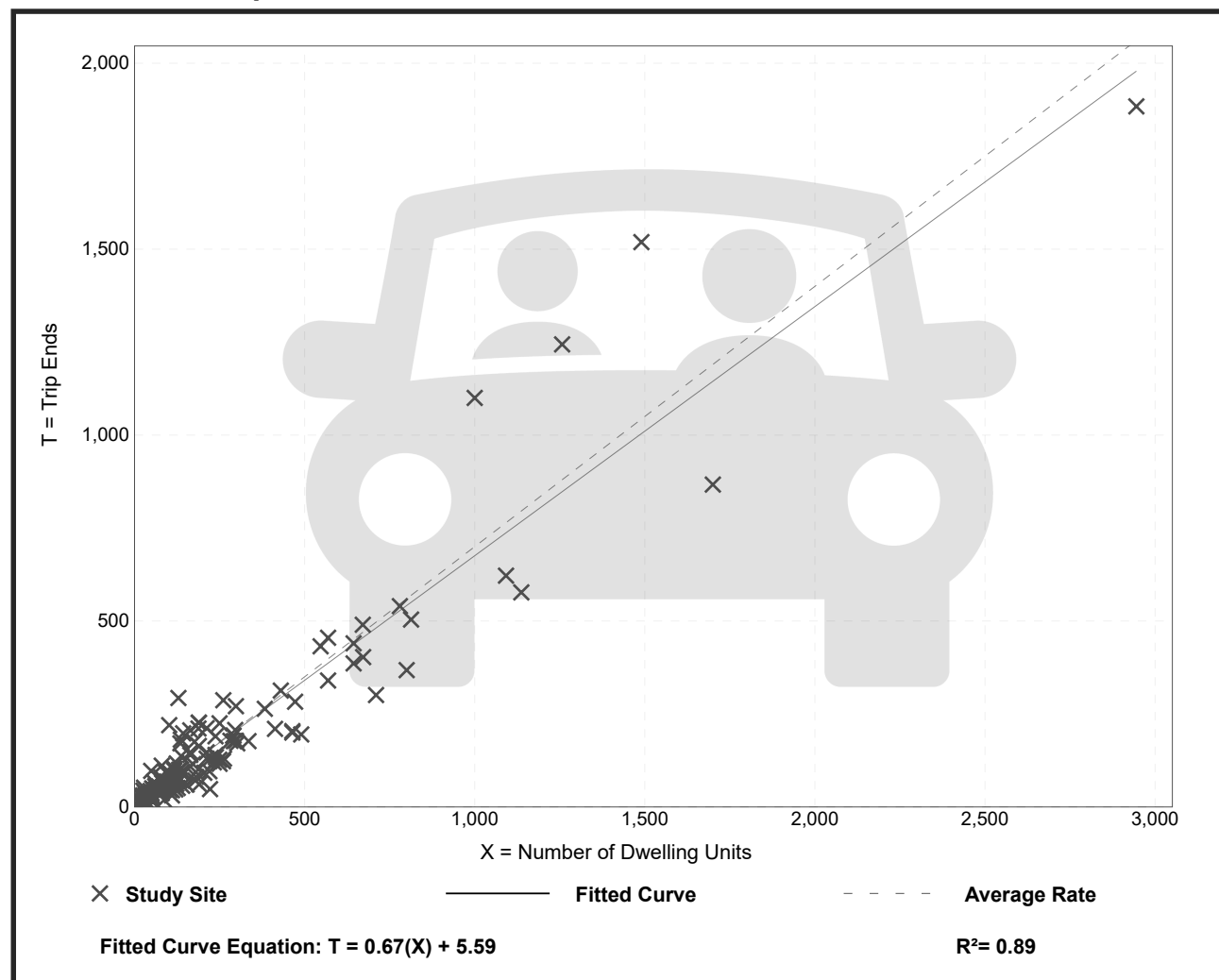
Avg. Num. of Dwelling Units: 239

Directional Distribution: 27% entering, 73% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
0.70	0.22 - 2.27	0.26

Data Plot and Equation



Single-Family Detached Housing (210)

Vehicle Trip Ends vs: Dwelling Units

On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 166

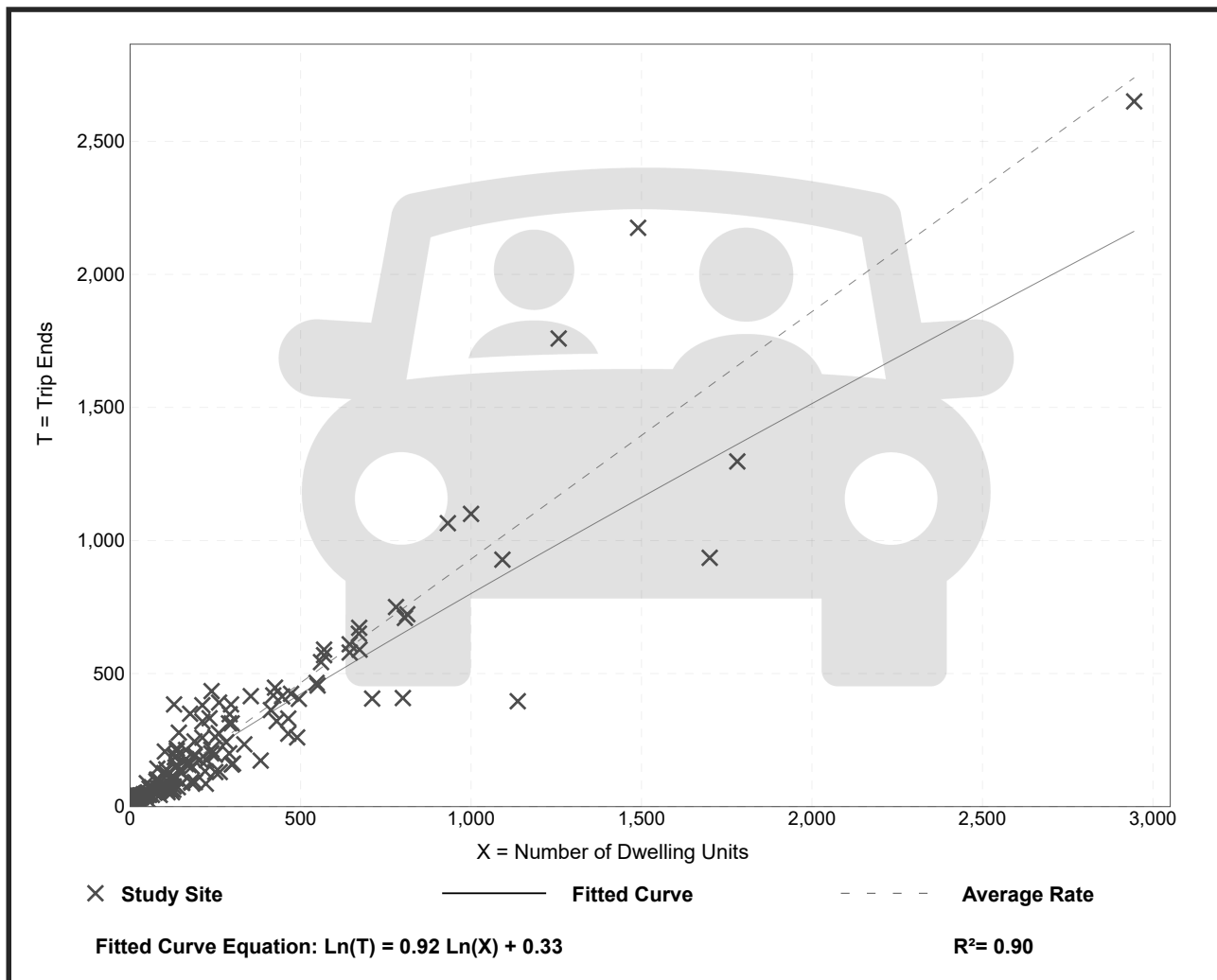
Avg. Num. of Dwelling Units: 266

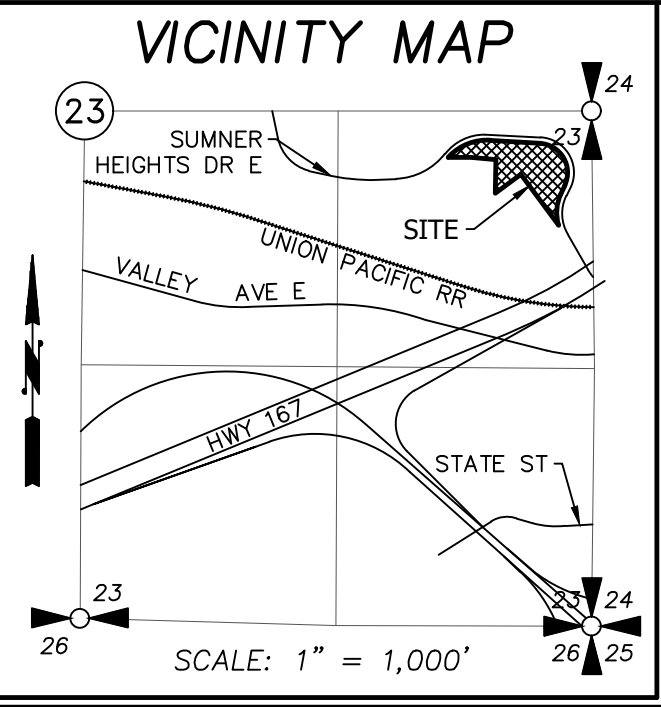
Directional Distribution: 62% entering, 38% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
0.93	0.35 - 2.98	0.33

Data Plot and Equation



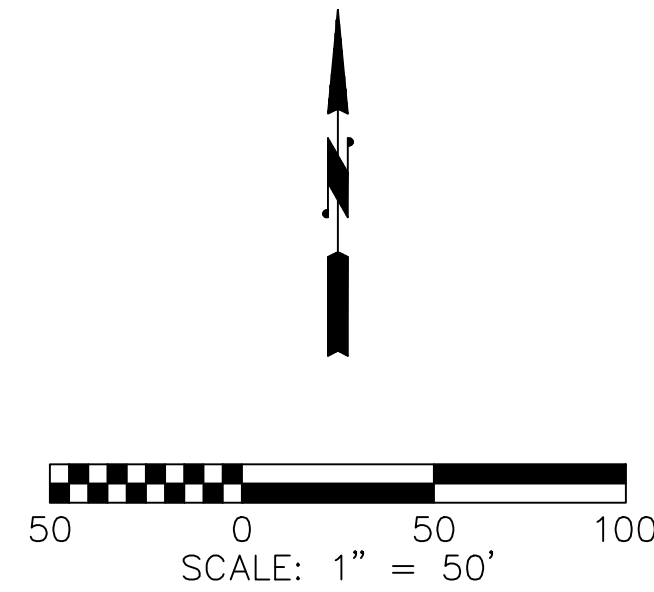
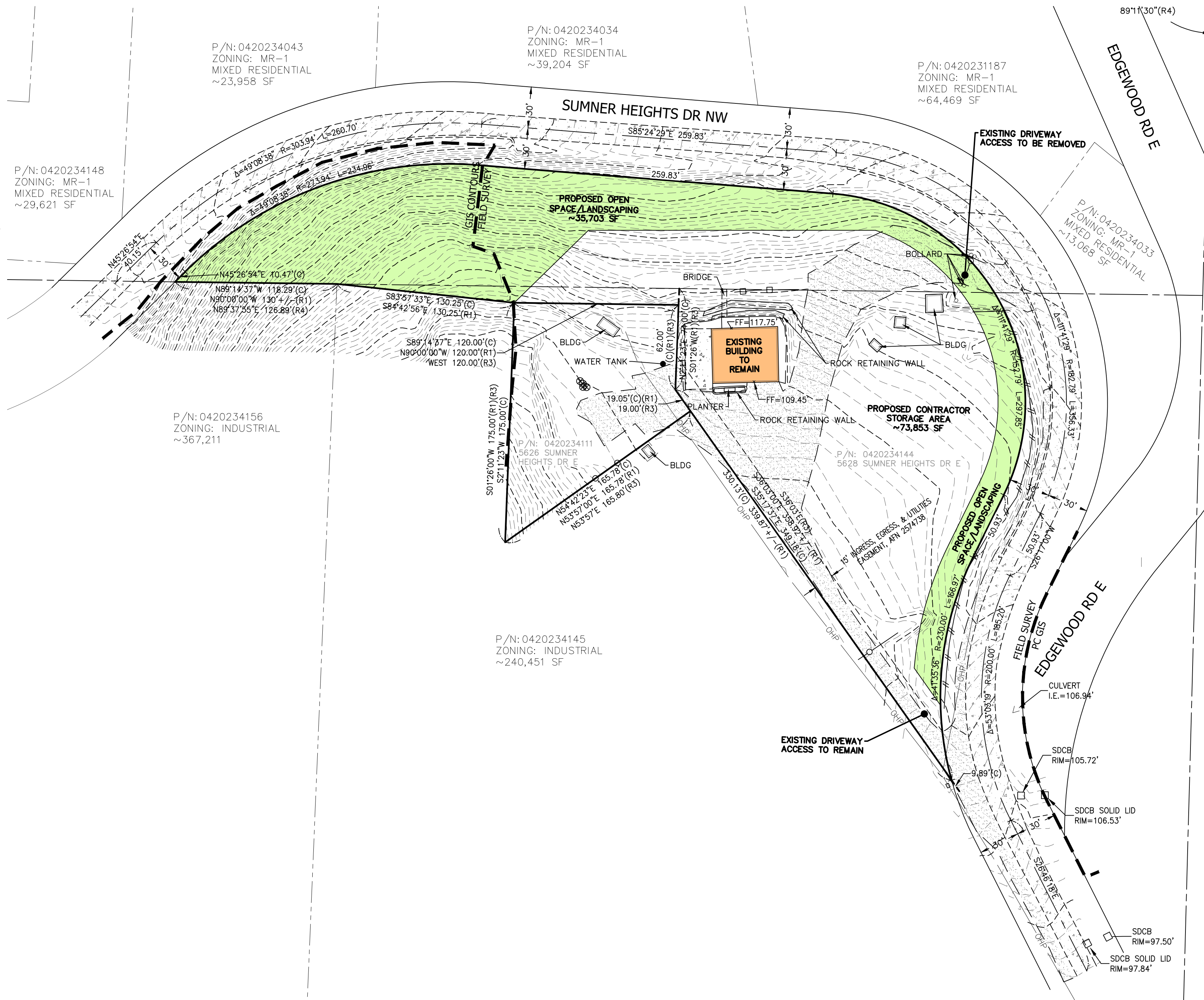


SCHOBER SITE PLAN

NE 1/4, SE 1/4, SEC.23, TWN.20 N., RNG. 4 E., W.M.
CITY OF EDGEWOOD, PIERCE COUNTY, WASHINGTON
EXAMPLE CONTRACTOR YARD

SITE DATA	
LAND OWNER:	5626 SUMNER HEIGHTS LLC BROCK SCHOBER
SITE ADDRESS:	5626 AND 5628 SUMNER HEIGHTS DR E, EDGEWOOD, WA 98372
ASSESSOR'S PARCEL NO.:	0420234111 & 0420234144
SITE AREA:	109,571 SF (2.52 AC.)
LAND USE DESIGNATION:	MIXED RESIDENTIAL LOW
ZONING:	MIXED RESIDENTIAL (MR-1)
PROJECT LAND USE DESIGNATION:	INDUSTRIAL
PROPOSED ZONING:	INDUSTRIAL (I)
PROPOSED USE:	CONTRACTOR'S YARD

LEGEND	
●	MONUMENT FOUND AS NOTED
⊕	CALCULATED MONUMENT POSITION
●	CORNER FOUND AS NOTED
□	CATCH BASIN
>	CULVERT
○	GATE POST
→	GUY ANCHOR WIRE
⊠	POWER JUNCTION BOX
⊙	SEPTIC TANK LID
⊕	SIGN
⊙	UTILITY POLE
—○—○—○—	CHAIN LINK FENCE
—//—//—//—	HOG WIRE FENCE
— — — — —	MAJOR CONTOUR LINE
- - - - -	MINOR CONTOUR LINE
—OHP—	OVERHEAD POWER LINE
—□—□—□—	WOOD FENCE
▢	CONCRETE
▨	GRAVEL
(C)	CALCULATED DISTANCE
(M)	MEASURED DISTANCE
■	PROPOSED OPEN SPACE/LANDSCAPING
■	EXISTING BUILDING TO REMAIN



VERTICAL DATUM
(WSRN)

NAVD 88 ESTABLISHED USING GPS RTK ROVER
CONSTRAINED TO THE WASHINGTON STATE
REFERENCE NETWORK (WSRN) STATIONS

CONTOUR INTERVAL=1'
TOPOGRAPHY PREPARED BY LARSON & ASSOCIATES

HORIZONTAL DATUM

NAD 83/11 WASHINGTON SOUTH ZONE
ESTABLISHED USING GPS RTK ROVER CONSTRAINED TO THE
WASHINGTON STATE REFERENCE NETWORK (WSRN) STATIONS

LEGAL DESCRIPTION

PARCEL A
(PER CHICAGO TITLE ALTA COMMITMENT FOR TITLE INSURANCE COMMITMENT NUMBER 0252797, COMMITMENT-THIRD,
COMMITMENT DATE: MAY 4, 2023 AT 08:00 AM)

COMMENCING AT THE NORTHEAST CORNER OF THE SOUTHEAST QUARTER OF SECTION 23, TOWNSHIP 20NORTH, RANGE
4 EAST, W.M., IN PIERCE COUNTY, WASHINGTON;
THENCE SOUTH 00°47' WEST 250.70 FEET TO INTERSECT A LINE DRAWN EAST AND PARALLEL WITH THE NORTH LINE OF
SAID SOUTHEAST QUARTER FROM A POINT ON THE WEST LINE OF THE J. W. MCCARTY DONATION LAND CLAIM, 1681.76
FEET NORTH OF THE SOUTHWEST CORNER THEREOF;
THENCE WEST PARALLEL WITH SAID NORTH LINE, 382.4 FEET;
THENCE SOUTH 01°26' WEST 12.00 FEET TO THE TRUE POINT OF BEGINNING;
THENCE WEST PARALLEL WITH THE NORTH LINE OF SAID SOUTHEAST QUARTER, 120.00 FEET;
THENCE SOUTH 01°26' WEST 175.00 FEET;
THENCE NORTH 53°27' EAST 165.80 FEET;
THENCE NORTH 36°03' WEST 19.00 FEET;
THENCE NORTH 01°26' EAST 62.00 FEET TO THE TRUE POINT OF BEGINNING;

TOGETHER WITH A NON-EXCLUSIVE EASEMENT FOR INGRESS AND EGRESS OVER AND ACROSS THE
FOLLOWING DESCRIBED PROPERTY:

COMMENCING AT THE NORTHEAST CORNER OF THE SOUTHEAST QUARTER OF SAID SECTION 23;
THENCE SOUTH 250.70 FEET TO INTERSECT A LINE DRAWN EAST FROM A POINT ON THE WEST LINE OF THE J.W.
MCCARTY DONATION LAND CLAIM, 1681.76 FEET NORTH OF THE SOUTHWEST CORNER THEREOF;
THENCE WEST PARALLEL WITH NORTH LINE OF SAID SOUTHEAST QUARTER, 382.40 FEET;
THENCE SOUTH 01°26' WEST 49.35 FEET TO THE TRUE POINT OF BEGINNING;
THENCE CONTINUING SOUTH 01°26' WEST 24.65 FEET;
THENCE SOUTH 36°03' EAST TO INTERSECT THE WESTERLY LINE OF SUMNER-MT. VIEW COUNTY ROAD;
THENCE NORTHERLY ALONG SAID ROAD TO INTERSECT A LINE DRAWN SOUTH 36°03' EAST FROM THE TRUE POINT OF
BEGINNING;
THENCE NORTH 36°03' WEST TO THE TRUE POINT OF BEGINNING.

PARCEL B
(PER CHICAGO TITLE ALTA COMMITMENT FOR TITLE INSURANCE COMMITMENT NUMBER 0252797, COMMITMENT-THIRD,
COMMITMENT DATE: MAY 4, 2023 AT 08:00 AM)

COMMENCING AT THE NORTHEAST CORNER OF THE SOUTHEAST QUARTER OF SECTION 23, TOWNSHIP 20 NORTH,
RANGE 4 EAST, W.M., IN PIERCE COUNTY, WASHINGTON;
THENCE SOUTH 00°47' WEST 250.70 FEET TO INTERSECT A LINE DRAWN NORTH 90°00'00" EAST AND PARALLEL WITH
THE NORTH LINE OF SAID SOUTHEAST QUARTER FROM A POINT ON THE WEST LINE OF THE J. W. MCCARTY DONATION
LAND CLAIM,
1681.76 FEET NORTH OF THE SOUTHWEST CORNER THEREOF;
THENCE NORTH 90°00'00" WEST 632.40 FEET, PARALLEL WITH SAID NORTH LINE, TO THE TRUE POINT OF BEGINNING
OF THIS DESCRIPTION;
THENCE SOUTH 84°42'56" EAST 130.25 FEET TO THE NORTHWEST CORNER OF THAT TRACT CONVEYED BY DEED
RECORDED UNDER RECORDING NO. 2574738;
THENCE NORTH 90°00'00" EAST 120.00 FEET TO THE NORTHEAST CORNER OF SAID TRACT;
THENCE SOUTH 01°26'00" WEST ALONG THE EAST LINE OF SAID TRACT, 62.00 FEET;
THENCE SOUTH 36°03'00" EAST 358.92 FEET, MORE OR LESS, TO THE WESTERLY RIGHT-OF-WAY LINE OF
MOUNTAIN VIEW SUMNER COUNTY ROAD;
THENCE NORTHERLY AND WESTERLY ALONG THE WESTERLY AND SOUTHERLY RIGHT-OF-WAY LINE OF SAID COUNTY
ROAD TO A POINT LYING NORTH 90°00'00" WEST FROM THE TRUE POINT OF BEGINNING;
THENCE NORTH 90°00'00" EAST 130 FEET, MORE OR LESS, TO THE TRUE POINT OF BEGINNING;

(BEING ALSO KNOWN AS PARCEL "A" OF DECLARATION OF BOUNDARY LINE REVISION RECORDED UNDER RECORDING
NO. 8509130518, RECORDS OF PIERCE COUNTY, WASHINGTON).

SITUATE IN THE COUNTY OF PIERCE, STATE OF WASHINGTON.

REVISION BLOCK			
NO.	DATE	DESCRIPTION	BY



JOB NUMBER			
SCALE	1"=50'	HOR.	VERT.
DESIGNED G.M.	MTP	DRAWN	CHECKED
PROPOSED:			
BROCK SCHOBER			
180 HANSON ROAD			
ELLENBERG, WA 98926			
CONTACT: BROCK SCHOBER			
TACOMA, WA 98444 (253) 474-3404			
SITE PLAN			
DATE			
11/4/2025			
DRAWING NO.			
10251BASE			
SHEET 1 OF 1			

CVR



Community & Economic Development Department

2224 104th Avenue East, Edgewood, WA 98372

(253) 952-3299 | <https://www.cityofedgewood.org/>

STATE ENVIRONMENTAL POLICY ACT (SEPA)

ENVIRONMENTAL CHECKLIST

FILE#: _____

Purpose of Checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for Applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Use of Checklist for Nonproject Proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the supplemental sheet for nonproject actions (part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements—that do not contribute meaningfully to the analysis of the proposal.

A. Background (to be completed by applicant)

1. Name of proposed project, if applicable:			
Schober Comp Plan Amendment and Rezone			
2. Applicant	Address (Street, City, State, Zip)	Phone	Email
5626 Sumner Heights LLC	5626 & 5628 Sumner Heights Dr E Edgewood WA 98372	509-925-6303	brock Schober brock@m2industrial.com
3. Contact Person	Address (Street, City, State, Zip)	Phone	Email
Grant Middleton, Larson and Associates	9027 Pacific Avenue, Suite 4 Tacoma WA 98444	253-474-3404	gmiddleton@rrlarson.com
4. DATE CHECKLIST PREPARED			
12-15-25			
5. AGENCY REQUESTING CHECKLIST			
City of Edgewood			

1. Proposed timing of schedule (including phasing, if applicable):

NA – no phasing is proposed.

2. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

Following the comp plan and rezone amendment process, the applicant anticipates gaining necessary entitlements for a future use following the comp plan and rezone approval process.

3. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Trip Generation Assessment and Geotechnical Assessment

4. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

None known

5. List any government approvals or permits that will be needed for your proposal, if known.

City of Edgewood

6. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The proposal is to amend the Comprehensive Plan Land Use Designation Map (from MR-1 to Industrial) and Rezone (from MR-1 to Industrial) for parcels 0420234144 and 0420234111.

7. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

Pierce County parcels 0420234144 and 0420234111, located at 5626 and 5628 Sumner Heights Dr E., Edgewood WA 98372; NE ¼, SE ¼, Section 23, Township 20 north, Range 4 East. A vicinity map and legal description is provided on the applicable site plans.

B. Environmental Elements

1. Earth

Find help answering earth questions¹

a. General description of the site:

The site is currently developed with an existing shop and large graveled area.

Circle or highlight one: flat, rolling, hilly, steep slopes, mountainous, other:

b. What is the steepest slope on the site (approximate percent slope)?

~ 40%

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

1D Alderwood gravelly sandy loam, and 19C Kapowsin gravelly ashy loam (NRCS Web Soil Survey)

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

None known.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Not applicable to the Comp Plan amendment and rezone; none known. Earth work volumes to be determined at the time of development permit application.

f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

Not applicable to the Comp Plan amendment and rezone; none known. The potential for erosion to be determined at the time of development permit application.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

The site currently has ~20% impervious surfaces (gravel, concrete and roofs); future impervious surfaces to be determined at the time of development permit application.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.

Not applicable to the Comp Plan amendment and rezone; none proposed at this time. Erosion control measures to be determined at the time of development permit application.

2. Air

Find help answering air questions²

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

¹ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth>

² <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air>

Not applicable to the Comp Plan amendment and rezone; none known; to be determined at the time of development permit application.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

Not applicable to the Comp Plan amendment and rezone; none known.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

Not applicable to the Comp Plan amendment and rezone; none known. Potential measures to be determined at the time of development permit application.

3. Water

Find help answering water questions³

a. Surface:

Find help answering surface water questions⁴

1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Not applicable to the Comp Plan amendment and rezone; none known.

2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

Not applicable to the Comp Plan amendment and rezone; none proposed.

3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

Not applicable to the Comp Plan amendment and rezone; none proposed.

4. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.

Not applicable to the Comp Plan amendment and rezone; none proposed.

5. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

Not applicable to the Comp Plan amendment and rezone; no the site is not within a 100-yr floodplain.

6. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

Not applicable to the Comp Plan amendment and rezone; no discharges to surface waters are proposed.

³ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water>

⁴ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water>

b. Ground:

Find help answering ground water questions⁵

- 1. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.**

An existing on-site well serves the existing storage building, which contains a restroom. Minor water use is contemplated for servicing the restroom and providing landscape irrigation. No water is proposed to be directly discharged to groundwater.

- 2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

Not applicable to the Comp Plan amendment and rezone; the existing storage building is served by an onsite septic system approved by TPCHD.

c. Water Runoff (including stormwater):

- 1. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

Not applicable to the Comp Plan amendment and rezone. Existing runoff patterns will be maintained; no water is proposed to be directly discharged to groundwater.

- 2. Could waste materials enter ground or surface waters? If so, generally describe.**

Not applicable to the Comp Plan amendment and rezone; no, none known.

- 3. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

Not applicable to the Comp Plan amendment and rezone; there are no planned changes to drainage patterns; drainage patterns will remain the same.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

Not applicable to the Comp Plan amendment and rezone; Potential measures to be determined at the time of development permit application.

4. Plants

Find help answering plants questions

a. Check the types of vegetation found on the site:

☒ **deciduous tree: alder, maple, aspen, other**

⁵ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater>

☒ evergreen tree: fir, cedar, pine, other

☒ shrubs

☒ grass

☐ pasture

☐ crop or grain

☐ orchards, vineyards, or other permanent crops.

☐ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other

☐ water plants: water lily, eelgrass, milfoil, other

☐ other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

Not applicable to the Comp Plan amendment and rezone. Any alteration or enhancement of vegetation will to be determined at the time of development permit application.

c. List threatened and endangered species known to be on or near the site.

None known; no threatened & endangered species identified per USFWS mapping.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.

Not applicable to the Comp Plan amendment and rezone. The use of native plants and enhancement of vegetation will to be determined at the time of development permit application; the conceptual site plan includes the retention of native trees/plants and anticipates enhancement plantings as may be required at the time of development.

e. List all noxious weeds and invasive species known to be on or near the site.

None are known.

5. Animals

Find help answering animal questions⁶

a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.

Examples include:

- **Birds:** hawk, heron, eagle, songbirds, **other:** Crows and sparrows, etc.
- **Mammals:** deer, bear, elk, beaver, **other:** None known
- **Fish:** bass, salmon, trout, herring, shellfish, **other:** None known; there are no water bodies.

b. List any threatened and endangered species known to be on or near the site.

⁶ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals>

None known; no threatened & endangered species identified per USFWS mapping.

c. Is the site part of a migration route? If so, explain.

The site is within the Pacific Flyway.

d. Proposed measures to preserve or enhance wildlife, if any.

Not applicable to the Comp Plan amendment and rezone. Potential measures, if any, to be determined at the time of development permit application.

e. List any invasive animal species known to be on or near the site.

None are known.

6. Energy and natural resources

Find help answering energy and natural resource questions⁷

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Not applicable to the Comp Plan amendment and rezone. The site is currently served by electrical power; energy needs will be evaluated at the time of development permit application.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

Not applicable to the Comp Plan amendment and rezone. The existing building and any future buildings will meet the prevailing standards, and, the site is substantially below the grade of properties to the north and therefore is not anticipated to have any effect on us of solar energy.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.

Not applicable to the Comp Plan amendment and rezone; Potential measures for energy conservation with meet the prevailing requirement, which will be determined at the time of development permit application.

7. Environmental health

Health Find help with answering environmental health questions⁸

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.

Not applicable to the Comp Plan amendment and rezone; none are known. Potential environmental health hazards will be reviewed and determined at the time of development permit application.

1. Describe any known or possible contamination at the site from present or past uses.

There is no known or possible contamination at the site from present or past uses.

2. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

⁷ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou>

⁸ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health>

Not applicable to the Comp Plan amendment and rezone. There are no anticipated existing hazardous chemical/conditions that might affect the site.

3. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

Not applicable to the Comp Plan amendment and rezone; none are known at this time. Potential toxic or hazardous chemicals will be reviewed and determined at the time of development permit application.

4. Describe special emergency services that might be required.

Not applicable to the Comp Plan amendment and rezone; no special emergency service needs are known at this time. Service needs will be reviewed and determined at the time of development permit application.

5. Proposed measures to reduce or control environmental health hazards, if any.

Not applicable to the Comp Plan amendment and rezone. The need for measures will be reviewed and determined at the time of development permit application; best management practices will be employed to mitigate any potential health hazards.

b. Noise

1. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

Not applicable to the Comp Plan amendment and rezone. Although there is area noise from train traffic as well as neighborhood and freeway vehicle traffic, there is no area noise anticipated to affect the site.

2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?

Not applicable to the Comp Plan amendment and rezone. Potential noise will be considered at the time of development permit application; noise will comply with City noise regulations/business hours for both short term and long term.

3. Proposed measures to reduce or control noise impacts, if any:

Not applicable to the Comp Plan amendment and rezone. Future development must comply with the City of Edgewood's noise regulations within City code.

8. Land and shoreline use

Find help answering land and shoreline use questions⁹

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The current adjacent uses to the:

North – Sumner Heights Dr E right-of-way and topographically elevated single family residential uses;

South – Industrial uses;

East – Sumner Heights Dr E right-of-way and a single-family residence;

West - undeveloped property.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses

⁹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use>

because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

There is no known historic farmland or working forest activities at this site.

- 1. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

None known.

- c. Describe any structures on the site.**

There is an existing storage building and several small outbuildings.

- d. Will any structures be demolished? If so, what?**

No structures are proposed to be demolished at this time.

- e. What is the current zoning classification of the site?**

MR-1

- f. What is the current comprehensive plan designation of the site?**

MR-1

- g. If applicable, what is the current shoreline master program designation of the site?**

Not applicable; the site is not within a City designated shoreline.

- h. Has any part of the site been classified as a critical area by the city or county? If so, specify.**

Parts of the site have been identified on the City of Edgewood GIS as potentially containing areas of 20 to 40% slopes.

- i. Approximately how many people would reside or work in the completed project?**

Not applicable to the Comp Plan amendment and rezone. The number of people working on the site will be evaluated at the time of development permit application; anticipated to be between 2 and 4 intermittently on site.

- j. Approximately how many people would the completed project displace?**

Not applicable to the Comp Plan amendment and rezone. No people will be displaced.

- k. Proposed measures to avoid or reduce displacement impacts, if any.**

Not applicable to the Comp Plan amendment and rezone. Not applicable.

- l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.**

Not applicable to the Comp Plan amendment and rezone. The existing topographic elevations support compatibility. Additional measures to be determined at the time of development permit application, which minimally include the retention of existing vegetation and the establishment of buffer planting strips along Sumner Heights Dr E right-of-way between the elevated SFR development north and east (see the conceptual site plan).

- m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:**

No mitigation measures are proposed.

9. Housing

Find help answering housing questions¹⁰

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.**

No residential housing is anticipated.

- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**

No existing residential houses will be eliminated.

- c. Proposed measures to reduce or control housing impacts, if any:**

None proposed.

10. Aesthetics

Find help answering aesthetics questions¹¹

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

Not applicable to the Comp Plan amendment and rezone. Future development must comply with the City of Edgewood's design and development regulations. The existing buildings are anticipated to be retained.

- b. What views in the immediate vicinity would be altered or obstructed?**

Not applicable to the Comp Plan amendment and rezone. The existing buildings are anticipated to be retained, which will not alter or obstruct views in the immediate vicinity. Future development must comply with the City of Edgewood's design and development regulations.

- c. Proposed measures to reduce or control aesthetic impacts, if any:**

Not applicable to the Comp Plan amendment and rezone. The existing buildings are anticipated to be retained. Future development must comply with the City of Edgewood's design and development regulations.

11. Light and glare

Find help answering light and glare questions¹²

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?**

Not applicable to the Comp Plan amendment and rezone. No new light and glare are anticipated with the retention of the existing buildings. New lighting will be reviewed for city code compliance at the time of development permit application.

- b. Could light or glare from the finished project be a safety hazard or interfere with views?**

Not applicable to the Comp Plan amendment and rezone. No new light and glare are anticipated with the retention of the existing buildings.

- c. What existing off-site sources of light or glare may affect your proposal?**

¹⁰ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing>

¹¹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics>

¹² <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare>

Not applicable to the Comp Plan amendment and rezone. No off-site light and glare are anticipated to affect the site.

d. Proposed measures to reduce or control light and glare impacts, if any:

Not applicable to the Comp Plan amendment and rezone. New lighting will be reviewed for compliance with City regulations at the time of development permit application.

12. Recreation

Find help answering recreation questions

a. What designated and informal recreational opportunities are in the immediate vicinity?

Not applicable to the Comp Plan amendment and rezone. No designated and informal recreational opportunities are known.

b. Would the proposed project displace any existing recreational uses? If so, describe.

Not applicable to the Comp Plan amendment and rezone. No.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

Not applicable to the Comp Plan amendment and rezone; no measures are proposed.

13. Historic and cultural preservation

Find help answering historic and cultural preservation questions¹³

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

There are no known buildings on site that are over 45-years old.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

None are known.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

Pierce County Register of Historic Places was reviewed as well as Pierce County GIS records.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

None are proposed.

¹³ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p>

14. Transportation

Find help with answering transportation questions¹⁴

- a. **Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.**

Sumner Heights Drive serves the site; please see the conceptual site plan.

- b. **Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

Not applicable to the Comp Plan amendment and rezone. There are no transit stops on Sumner Height Drive. The closest bus stop is northwest and is ~15,000 feet via surface roads along Meridian Ave, Route 402.

- c. **Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).**

Not applicable to the Comp Plan amendment and rezone. The site is currently served by 2 points of access; 1 is proposed to be closed. Frontage improvements will be reviewed for compliance with City regulations at the time of development permit application.

- d. **Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

Not applicable to the Comp Plan amendment and rezone. Rail is in the immediate vicinity, but does not serve the site.

- e. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

Not applicable to the Comp Plan amendment and rezone. A Trip Generation Assessment for an example industrial use, a contractor yard, has been determined to generate 10 ADT, which was submitted to the City for CRC compliance review. The City issued a determination of compliance as an exemption.

- f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

It is not anticipated that development will affect or be affected by the movement of agricultural and forest products on roads or streets in the area.

- g. **Proposed measures to reduce or control transportation impacts, if any:**

Not applicable to the Comp Plan amendment and rezone. No impacts are anticipated based on the Trip Generation Assessment; the City issued a determination of compliance as an exemption.

15. Public services

Find help answering public service questions¹⁵

- a. **Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.**

¹⁴ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation>

¹⁵ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services>

Not applicable to the Comp Plan amendment and rezone. Future development will be reviewed for city code compliance at the time of development permit application. The development of a future industrial use is not anticipated to result in an increased need for public services.

b. Proposed measures to reduce or control direct impacts on public services, if any.

Not applicable to the Comp Plan amendment and rezone. Future development will be reviewed for city code compliance at the time of development permit application. Future industrial development is not anticipated to result in an increased need for public services.

16. Utilities

Find help answering utilities questions¹⁶

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:

Electricity, water, telephone, and on-site septic.

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Electricity – Lakeview Light and Power; water – on-site well; telephone CenturyLink, and on-site septic.

C. Signature

Find help about who should sign¹⁷

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

X 

Type name of signee: Scott Clark

Position and agency/organization: Planner – Larson and Associates

Date submitted:

D. Supplemental sheet for nonproject actions

Find help for the nonproject actions worksheet¹⁸

Do not use this section for project actions.

¹⁶ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities>

¹⁷ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature>

¹⁸ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-d-non-project-actions>

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Generally speaking, the characteristics of industrial development when compared to residential development sometimes include larger buildings, greater impervious surface, greater truck traffic, greater air emissions, use/storage of toxic substances, and greater noise generating activity.

- **Proposed measures to avoid or reduce such increases are:**

Measures to avoid or reduce such increases include adherence and enforcement of regulations to limit noise generation, require the construction of adequate road and utility infrastructure, minimize air pollution impacts, require safe storage and use of toxic substances, and require prevention, treatment, and/or control of waste discharge to the environment.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

The proposal will not materially affect plants or animals; establishment of buffers and tree retention areas will actually be an enhancement. Fish and marine life are not present.

- **Proposed measures to protect or conserve plants, animals, fish, or marine life are:**

Measures include adherence and enforcement of all critical area regulations to protect plants and animals; fish marine life is not present. Mitigation measures can be required to protect, buffer and enhance key critical area in conjunction with proposed development.

3. How would the proposal be likely to deplete energy or natural resources?

Industrial development will not likely deplete energy since the site is located in a urbanized area with access to existing energy infrastructure. Given the current state of development at the site, future industrial development will not deplete natural resources beyond what the residential uses would deplete.

- **Proposed measures to protect or conserve energy and natural resources are:**

Measures to conserve energy will include compliance with energy code standards, use of energy efficient materials and equipment, and commissioning equipment for peak performance. Measures to conserve natural resources include compliance with critical areas regulations and installation of modern utility infrastructure as needed.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Industrial development will not likely use or affect protected environmental areas provided current regulations for critical areas are applied and enforced.

- **Proposed measures to protect such resources or to avoid or reduce impacts are:**

Future industrial development will be required to comply with all applicable current critical area regulations, including compliance with necessary mitigation.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Not applicable. This site is not associated with any shoreline areas.

- **Proposed measures to avoid or reduce shoreline and land use impacts are:**

Not applicable. No measures are proposed as this site is not associated with any shoreline areas.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

The proposal will likely decrease demands on transportation, public services, and utilities in a manner commensurate with the proposed use. For example, the TIA evaluates the traffic impacts of a contractor yard, which would have ten (10) ADT trips, while the development of 7 residences (conservatively estimated) would have seven (7) times the impact with ~70 ADT if developed with single family residences (ITE Manual (210)).

- **Proposed measures to reduce or respond to such demand(s) are:**

Measures include application of development standards for transportation and utility infrastructure to address and mitigate project impacts. Collection of impact fees, taxes, and other revenue sources mitigate public service needs.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

The proposed comprehensive plan amendment and rezone will not conflict with any laws or requirements for the protection of the environment provided all applicable standards and procedures are implemented for the future development and use of the land.

From: Amanda Leinen <amandal6580@gmail.com>
Sent: Friday, April 10, 2026 11:12 AM
To: comdev
Subject: Proposed new zoning Sumner Heights

*This message is from an External Sender

Dear City of Edgewood Planning Commission and City Council,

I am writing to formally oppose the proposed rezoning of Parcel #0420234144 from residential to commercial use.

This proposal raises serious concerns regarding safety, infrastructure capacity, and compatibility with the surrounding neighborhood. The area in question is characterized by narrow, aging roads that are already worn, uneven, and have not been meaningfully upgraded in decades. These roadways were not designed to accommodate commercial traffic—particularly large delivery trucks or increased daily vehicle volumes.

Introducing commercial zoning at this location would significantly increase traffic demands on infrastructure that is already inadequate. This is especially concerning given the area's hilly terrain, lack of sidewalks, and absence of street lighting, all of which create existing safety challenges for residents, pedestrians, and drivers. Adding commercial traffic to these conditions would only heighten the risk of accidents and further degrade road conditions.

Beyond infrastructure concerns, this proposal is fundamentally incompatible with the character of our neighborhood. This is a small, wooded, and quiet residential area that many of us specifically chose because of its rural feel, privacy, and connection to nature. Residents value the presence of wildlife, the tree cover, and the peaceful environment that defines this community. This road is also used regularly by people in the neighborhood as a challenging, yet interesting walk for themselves and their dogs.

Rezoning this parcel to commercial use would disrupt that balance—introducing noise, lighting, traffic, and development intensity that would permanently alter the character of the area. It would also threaten the wildlife habitat and natural setting that are an important part of why people choose to live here.

Residents made long-term decisions to live in this neighborhood based on the expectation that it would remain residential, quiet, and

low-impact. This proposal undermines that expectation and sets a concerning precedent for further encroachment into similar areas.

There also appears to be a disconnect between this proposal and the City's responsibility to ensure that infrastructure is sufficient to support new development. Without substantial and clearly defined road improvements, safety upgrades, and mitigation measures, this rezoning places an unfair burden on existing residents.

For these reasons, I respectfully urge the City to deny the proposed rezoning of Parcel #0420234144.

Please include this letter in the official record for this proposal. I also request to be recognized as a party of record and to receive notice of any future hearings or decisions related to this application.

Thank you for your time and consideration.

Sincerely,
Jeff & Amanda Leinen
12911 56th Street Ct E
Edgewood, WA 98372
206-349-6613

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Andrea Preston <awmused@hotmail.com>
Sent: Wednesday, April 15, 2026 12:09 AM
To: comdev
Subject: File #25-002-COMP PLAN

***This message is from an External Sender**

My husband and I live on 56th Avenue East, directly across Edgewood Drive from the parcels for which this amendment is being sought and have several concerns about the requested change in designation from residential to commercial.

First, we have several concerns about the traffic impact the business change may make. Although the traffic review that has been filed estimates the additional traffic may be relatively minor, the traffic in that location is one of the worst bottlenecks in the area as Edgewood Drive and Sumner Heights Drive East merge at proposed entry/exit for the subject property. This is the final junction for southbound traffic coming from the eastern portion of Edgewood moving toward Sumner before Sumner Heights Drive meets West Valley Highway just north of the railroad tracks. While the 4-5 lanes of Meridan Avenue North runs the full length of the city, channeling traffic between Edgewood and Puyallup including the upcoming final link of Highway 167 to I-5, there are only three routes from to and from east Edgewood that connect to Sumner via the popular Cannery Way and bridge between the Old Cannery Furniture Warehouse and Sumner's Main Street shops. This traffic corridor funnels traffic to and from three directions, including:

- 1) traveling north/south via Edgewood Drive/Sumner Heights;
- 2) traveling north/south via West Valley Highway (including vehicles entering and exiting from Highway 167); and
- 3) east and west-bound traffic between Puyallup, west Edgewood, Milton, Fife and Highway 167.

All of these routes converge at the intersections on the north and south of the railroad tracks that run around the southernmost tip of Edgewood, crossing the border of Edgewood and Sumner. (Our property, in fact, encompasses land in Sumner as well as Edgewood). The traffic at these two intersections often backs up during peak commuting hours and/or when trains stop the flow of traffic into Sumner from all of these traffic streams. The traffic at these intersections is further complicated by the necessary timing of the traffic lights to prevent traffic from backing up over the train tracks. In fact, traffic regularly backs up on Edgewood Drive past our street (56th Avenue East) as well as along Sumner Heights Drive leading to where it merges with Edgewood Drive. At the same time, the eastbound traffic approaching Cannery Way backs up approaching the light on the south side of the train tracks, as well as from that point to the traffic light after the bridge where Cannery Way becomes Main Street in Sumner. The southbound traffic coming on West Valley Highway, likewise, backs up significantly from the southernmost exit from Highway 167 to Sumner and the many warehouses located in Sumner's north end.

While the projected traffic from the currently proposed business estimates adding fewer than 20 vehicles coming and going from the property each day, that estimate does not disclose the full nature of the vehicles expected. Cars and small trucks may have minimal impact, but larger trucks and trucks with trailers could have significant impact to not only the traffic that is already overtaxing these routes, particularly when deliver van traffic has increased dramatically over the last five years. All routes converging on this key intersection at the convergence of Edgewood, Puyallup and Sumner are two lane roads. Each of the four routes approaching or leaving the convergence creates a bottleneck of traffic and contributes to the potential of vehicles getting stuck on or dangerously near the train tracks, especially where there are distinct turn lanes on Cannery Road, but not on Sumner Heights nor on West Valley Highway at this complex intersection. Drivers frequently drive

on the shoulder of these roads in order to get through the intersections. Drivers also run red lights at these intersections where right turns are not permitted when the lights are red. Although the lights are timed to prevent traffic backing up over the train tracks, it does happen, particularly when the right turn prohibitions are not followed and when traffic is backed up due to passing trains.

These intersections are already overloaded with traffic and are limited by terrain, train routes and existing structures, making the feasibility of widening any of these roads highly unlikely. Adding vehicles that may be heavier, wider and longer than the residential vehicles that form most of this traffic could not only add to the traffic, but could be the proverbial straw that breaks the camel's back where all of these stressors converge across and adjacent to busy train traffic. Where trains travel this route multiple times every day, the risk is not merely adding to time lost along already congested routes, but could increase the danger of significant accidents that endanger the life of drivers and passengers, but also increase the chance of vehicle-train collisions and consequently raising the risk of spilled or released contaminants from train cars at the foot of a hill covered in hundreds of residences. Furthermore, any significant blockage of this intersection impacts the ability of emergency services to reach homes and businesses in Edgewood and Sumner, as well as responding to emergencies in traffic along Highway 167.

Edgewood Drive and Sumner Heights Drive are most particularly not designed for industrial traffic. Both roads have little to no shoulder, and traverse hills and curves with significant elevation changes and erosion risks. Additionally, significant water drainage runs adjacent to Edgewood drive from the top of the hill to the point where it merges with Sumner Heights where it is collected and diverted under the roadway. Industrial traffic is already limited on these roads while there is significant industrial traffic generated from the many warehouses situated in the valley north of Sumner as well as to the east in Puyallup and Fife. To the extent larger trucks or trucks with trailers will enter and exit the subject property, they will add significant stress to roads not built for these vehicles and already operating at or above their intended use and capacity, thus increasing need for road maintenance and repair.

While the submission paperwork asserts that a portion of the subject land was previously zoned for industrial use and is located adjacent to another industrial use property, these facts alone are misleading. The property, in fact, has not been used for industrial purposes for at least the seven years we have lived across from it and, based on the buildings on the property, it does not appear that there has been any industrial use on either parcel for many years, if not decades. The referenced adjacent industrial property is not a typical or easily comparable property or business. That property has grown from a small family owned concrete septic tank business which began when it took over a previously industrial property nearly 40 years ago. That business, Evergreen Precast, last expanded in the early 2000's and it remains the sole business whose entrance and egress is located on Sumner Heights Drive. In fact, it is the sole business at the base of the hill north of the train tracks. The subject property has been historically used as a residence and any previous industrial use has not been disclosed. Most of the property is wooded with mature evergreen and deciduous trees and manicured gardens. Other than its border with Evergreen Precast, the property is directly adjacent or across residential streets from other residential properties. The more recent of these homes were built 30-40 years ago, but many of the adjacent homes have been in situ for 50-90 years (or more). Aside from Evergreen Precast, this is a long-settled, residential area known for peaceful, generous lots, affording owners beautiful views of Mount Rainier and the Sumner and Puyallup valleys. The other industrial businesses in the area are all at the base of the hill on the opposite side of the train tracks where they do not contribute to significant traffic on Edgewood Drive and Sumner Heights, impede views, or add distinct industrial noise for Edgewood residents.

The permit application additionally raises concern for neighboring property owners in that it provides little information regarding how the property will actually be used on a daily basis. While it states that business property and equipment will be stored on the site, it does not disclose what type of property or equipment, how it will be stored, whether the property will be secured or if unsecured property would be left in open areas that could encourage theft in an area that currently has a very low crime rate. We also do not know if the current wooded nature of the property will be changed and, instead of property consistent with

surrounding homes throughout Edgewood, trees and landscaping will be removed and land cleared. Such a drastic change would be inconsistent with the setting of all of the neighborhoods north of the property, and would likely have a negative impact on surrounding property values.

The proposal alludes to the fact that Edgewood needs to have sufficient industrial property under its Land Use Plan, but this is one of the least logical locations to add industrial property in Edgewood. In a city historically known for its pastoral scenery and a natural rural housing environment, adding industrial property directly adjacent to thousands of acres of residential properties is not justified by one adjacent industrial property. Furthermore, there are miles of industrial properties along the North Meridian corridor that are well suited for the proposed use of this business. There are also plentiful options for industrial property within a few miles in Sumner, Auburn, Puyallup and Fife.

It is not necessary to add industrial property on the southernmost edge of Edgewood where all but one of the adjacent properties are residential when there are many other options already zoned for industrial use. It is not the best use of the city's streets and resources to convert residential property, increase the wear and tear of local roads, compound already complex traffic patterns and decrease safety concerns in one of the most complex intersections in the area. This zoning change should not be approved at all, but if the City will not decline the request, it should at the very least, require additional information to ensure that the property is used and maintained in a complementary manner to the surrounding residential area and mitigation be made to reduce the impact on traffic and safety.

Thank you for your consideration,

Andrea and Scott Preston
13420 56th Street East
Edgewood, WA 98372

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Andres Goyenechea <agoyenechea@aol.com>
Sent: Monday, March 30, 2026 2:10 PM
To: comdev
Subject: Concerned community member about the rezoning proposal at 5628/5626 Sumner Heights Dr

***This message is from an External Sender**

Dear City Council Members,

My name is Andres Goyenechea and have been an established community member since 1975. My wife and I built our first home at 5415 Sumner Heights Dr E. We raised our family here and made a long-term investment to in this neighborhood. This was not just a placed I lived, it was my home and the foundation of my family's lives. All of my four kids used the bus route on Sumner Heights to go to school, and my wife would walk the hill down to Sumner, WA with her friends often, which makes the safety of the street so important to me.

Because of that, I am very concerned about the potential impacts rezoning could have on the community and the people that live there. The possibility of industrial use so close to residential homes raises serious questions about safety, quality of life, and property values. Increased noise affecting daily lives and work from home environments. Traffic and safety risks especially for children and families along active school bus routes. Air quality for current children and future children waiting for the bus and the environmental impacts immediate and long term. The long-term character and charm of the neighborhood.

Our neighborhood has always been a place where families could feel safe, stable, and proud to call home. The rezoning of 5628/5626 would threaten this balance.

I respectfully ask that you carefully consider the cumulative impact that this change would have on existing residents especially those of us who have invested years into building and maintaining our homes and the community. I strongly urge you to deny the rezoning request.

Thank you for your time and consideration voices of the residents who call Sumner Heights home.

Sincerely,

Andres Goyenechea

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Christina Edmondson <christinalf63@gmail.com>
Sent: Sunday, April 12, 2026 5:23 PM
To: comdev
Subject: Comment on Rezone on Edgewood Drive

***This message is from an External Sender**

Hello,

Voicing my concern over the rezone proposal on Edgewood Drive.

What's that shaking my house? One day I went to look. I thought it was a heavier than normal train. Nope, it was trucks , trucks and more trucks.

I know what comes next, mass lights to keep their stuff safe, scraping steel and guardrail moving about at all hours of the day.

Not to mention the warming up of diesel trucks in the morning and the fumes wafting up the hill.

I've worked in a yard like this, I know. This is WAY to close to nice homes on Edgewood Drive, Sumner Heights Drive and the side streets for a ½ mile.

This owner needs to be held accountable for his future actions and stick to it. I believe it is the city's duty to make the owner abide by the rules, strictly.

I also see this property has been under fire before about not following rules and has noise complaints.

What has the city done? Not sure, because it still keeps happening.

Why? Well, I pretty much know why, but that is a whole other story.

I'm not against progress at all, I understand it comes and is necessary for the grand plan of the municipalities in the state of Washington.

I also know what is right. And this is not. Period.

No Rezone .

Christina Edmondson

55th St E.

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: coateswood@comcast.net
Sent: Sunday, April 12, 2026 3:00 PM
To: comdev
Subject: Opposition to Rezone Application File #25-002-COMP Plan: Schober Comprehensive Plan

***This message is from an External Sender**

Karen Coates

5623 131st AVE E
Edgewood WA 98372
253-341-3983
KarCoates@Comcast.net

April 12, 2026

To: Edgewood Planning Commission / Edgewood City Council
Attn: Department of Community and Economic Development
Re: Opposition to Rezone Application File #25-002-COMP Plan: Schober Comprehensive Plan

To the Members of the Commission and Council,

I am writing as a resident of Edgewood to formally express my strong opposition to the proposed rezoning of 5626 & 5628 Sumner Heights Dr E Tax Parcel(s) 04202341111, 0420234144 from Residential to Industrial.

I am living in the home I grew up in since 1967, which was unincorporated Sumner for decades and is now Edgewood. Our family voted for becoming part of the City of Edgewood because we were told the city's main goal would be to stay rural. I have lived in the same home in Edgewood for the majority of my life, and like many of my neighbors, our family chose this community for its quiet, residential atmosphere. In our City's 2024 Comprehensive Plan's Policy of Vision 2050, one area of vision is "Economic development policies support a **distinctive built and natural character and high quality of life** as key economic development drivers." I believe this rezone is inconsistent with that vision for the following reasons:

- **Traffic and Safety:** Our current infrastructure, specifically Sumner Heights Drive E is not designed to handle the increased volume of industrial vehicles this change would bring. This poses a direct safety risk to local pedestrians and children.

In addition, there is not adequate buffer between the proposed industrial zone and our home. Case in point, the illegal industrial use of the land that has occurred to date has caused vibration in our home that is significant enough that our guest (my sister) has been woken up by her bed shaking in the middle of the night. It was confirmed by our neighbors Evan and Mariah at 5629 Sumner Heights Dr E, who live across from the property seeking rezoning, that this is due to the industrial size trucks that are going in and out of the property late at night. They know this because they see them and they feel the

vibration in their home. The interrupted sleep caused by this vibration is very detrimental to a person's health.

Furthermore, we are having increased issues with landslides that make our properties unsafe. It is reasonable to assume this has been exacerbated by the vibration caused by the illegal industrial use of the land. Making the industrial use legal would only increase the occurrence of the vibrations, therefore increasing the negative impact to our safety, health and well-being – our “high quality of life” as stated in Vision 2050.

- **Neighborhood Character:** Introducing an industrial entity into this specific pocket of the city will create significant light pollution, noise, and a loss of privacy for the surrounding homes. Already, the owner of the property has been removing trees and increasing noise pollution. This compounds the problem already present with Sumner's industrial use of adjacent properties. This will make a bad situation much worse.
- **Property Values:** Transitions from residential to industrial use often negatively impacts the market value of adjacent single-family homes. I have been putting significant money into my home the last several years to allow my 80-year-old parents to remain living with me and to make it my forever home. These upgrades do not necessarily increase the value of the home. I will be heartbroken if I have to sell our home due to the issues created with the nearby area rezoning from residential to industrial. I would in essence lose the money I've put into upgrades and on top of that have to sell my home at a lower market value.
- **Environmental Impact:** As stated above, I have great concerns about the vibrations causing landslides as the rezone area includes a steep bank and it is adjacent to a steep bank across the street from our house, so this is an impact that goes beyond my lot and the lot my parents own next door. In addition, we see bald eagles from time to time and many times see red hawks soaring above the trees. We are concerned for the land and the habitat.

I respectfully urge the City to deny this rezone request and uphold the current residential zoning that protects the integrity of our neighborhood.

Thank you for your time and for considering the concerns of the residents who will be most affected by this decision.

Sincerely,

Karen Coates



Virus-free. www.avg.com

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Kakai Bojang

From: coateswood <coateswood@comcast.net>
Sent: Monday, April 6, 2026 5:19 PM
To: comdev
Subject: Sumner Heights rezoning

***This message is from an External Sender**

We have owned our home in Edgewood since 1966 and our family has enjoyed in this quiet well established neighborhood of nice homes. The concrete vault company below us has added greatly to the noise pollution and also air pollution. We absolutely appose changing the designation of the 2 parcels from residential to industrial.
Jim and Esther Coates.

Sent from my Galaxy

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Kakai Bojang

From: Dan <jaybirdshs63@gmail.com>
Sent: Sunday, April 12, 2026 7:26 PM
To: comdev
Subject: Rezoning

*This message is from an External Sender

Edgewood City Council,

I am writing to register my strong opposition to the proposed zoning change at parcel 04202234144 at 5628 Sumner Heights Drive E. This property has always been residential. Rezoning it to industrial would negatively impact the homes near it, including mine, with additional truck traffic and noise pollution. Please DO NOT rezone this property.

Respectfully,

Dan Edmondson

13115 55th St. E.

Edgewood,

Sent from my iPhone

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Kakai Bojang

From: Dorsey Marx <dorseymarx@gmail.com>
Sent: Monday, April 13, 2026 8:46 AM
To: comdev
Subject: Rezone area sumner heights

*This message is from an External Sender

To whom it may concern,

Hello, my name is Dorsey Marx. My husband, John and I just bought our dream retirement home in Edgewood/Sumner Heights last year. We moved back to Edgewood for the beauty and peace and we are lucky enough to have a view of Mount Rainier from our home.

We were very distressed to hear about the idea of rezoning the land right below us at 5629 Sumner Heights Dr E. to industrial instead of residential.

We have more noise here than we wanted already. The trains blow their horns and we hear the 167 traffic a little bit. The last thing we need is heavy machinery noise, more truck noises, extra industrial sounds and booms, more light pollution and stinky emissions of all kinds. We also don't want anything to block our mountain view.

If a business is allowed to move into the neighborhood, it will make our house value go down and our peaceful, beautiful home and neighborhood will lose too much of its charm and peace. This would be devastating to us after just finding such a lovely area to live in.

Sumner Heights is a special neighborhood full of wonderful people. It is a residential area and should stay that way. We do not want Summer Heights Dr. East to be turned into an industrial area ever. Please keep all of Sumner Heights residential as it should be.

Sincerely,
Dorsey Marx
Edgewood resident

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Kakai Bojang

From: Doug and Vancie Daniels <vandoug@msn.com>
Sent: Tuesday, April 14, 2026 4:15 PM
To: comdev
Subject: File #25-002-COMP PLAN Schober Comprehensive Plan Amendment and Rezone

***This message is from an External Sender**

We would like to express our opposition to this plan.
Reason being: Rezoning to Industrial would have negative affects of
Safety, noise and home values in our residential community.

Sincerely,
Doug & Vancie Daniels
13215 56th st e
Edgewood
253-863-1212

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Eric Paige <ericmpaige@gmail.com>
Sent: Friday, April 3, 2026 6:25 PM
To: comdev; comdev
Subject: Concerns regarding File#25-002-COMP PLAN Schober Comprehensive Plan Amendment and Rezone

Importance: High

***This message is from an External Sender**

Dear Planning Commission and City Council Members,

I am writing as a nearby resident to express strong concern regarding the proposed Schober Comprehensive Plan Amendment and Rezone (File #25-002-COMP PLAN), which seeks to change the property from a residential designation to industrial. This amendment is incompatible with long-established residential uses of neighboring properties and is inconsistent with the policies and intent of our City's Comprehensive Plan.

More importantly, as a longtime resident and member of the first city council of the city of Edgewood, I know that this amendment is contrary to purpose of our city's incorporation, to ensure a sustainable community. Among the many problems with this amendment are the following:

1. The Edgewood comprehensive plan seeks to protect residential neighborhoods and ensure compatibility and appropriate transitions among different land uses. An industrial rezone abutting established single-family homes fails to honor the Plan's intent. Expanding industrial zoning next to these residences brings noise, lighting, emissions, vibration and truck traffic. These things would have a strongly negative impact on residents and contradict the City's stated land-use pattern goals.

The land use harms of the proposed amendment include:

1. Failing to maintain compatible land use patterns.
 2. Intensify existing traffic congestion at an already congested nearby intersection.
 3. Degrading existing residential areas.
 4. Eroding buffer zones between higher intensity uses and residential zones.
 5. Seriously damaging the City's small-town residential character as described in the plan vision.
2. Conflicts with the Community Character element of the plan which calls for development to preserve neighborhood identity, maintain buffers, protect public views, reduce intrusive lighting and retain vegetation. While industrial uses exist on Valley Ave, those uses directly contradict the community character sought for Edgewood. The community character harms of the proposed amendment include:
 1. Compromising the existing neighborhood's consistently residential identity
 2. Introducing intense industrial activities inconsistent with existing community character.
 3. Eliminating buffering vegetation critical to protecting the neighborhood.
 4. Introduce intrusive lighting, emissions and noise.

5. Introducing heavy traffic on country roads poorly suited to industrial activity.
3. Rezoning to this area to industrial use would violate the Natural Environment goals of our community's plan. Industrial uses have grave environmental off-site including pollution of air and groundwater along with adverse impacts associated with traffic, and industrial activity. Of particular concern are risks to slope stability from vibrations associated with industrial activity. A comprehensive plan change like this should undergo a SEPA review. However, even a SEPA review, industrial use will certainly harm the community by introducing:
 1. Traffic impacts
 2. Noise impacts
 3. Vibration impacts
 4. Lighting impacts
 5. Stormwater and water quality impacts
 6. Risks to slope stability
 7. Cumulative neighborhood impacts
4. Rezoning this parcel to industrial use contradicts Edgewood's adopted vision which commits to "Preserving rural small-town character, family friendly neighborhoods, trees, and open spaces." It also calls for land use decisions to maintain environmental and social sustainability. Introducing industrial use into residential neighborhoods would:
 1. Destabilize the neighborhood character.
 2. Deprive families of scarce quality housing.
 3. Undermine vision of environmental sustainability

I request the city deny the Schober Comprehensive Plan Amendment and maintain the existing residential designation. The proposed industrial rezone is not consistent with the City's adopted land use designations, community character, natural environment policies or vision statement.

With thanks,

Eric and Linda Paige

13428 56th St. E. Edgewood, WA 98372

(253) 230-7659

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Kakai Bojang

From: Evan Wall <ewall@escoffier.edu>
Sent: Tuesday, March 31, 2026 4:00 PM
To: comdev
Subject: interest in property rezoning of 5626/5628 Sumner Heights Drive East

***This message is from an External Sender**

Hello, My name is Evan Wall. I live at 5629 Sumner Heights Drive East. Edgewood, WA 98372. I am writing to you because I am concerned if the property across the street from our home were to be granted Industrial Zoning, a number of issues and problems would begin to take place.

The first issue that comes to mind is noise and air pollution. We have been living across from this company for two years and they operate at all hours of the night. Most often between 12:00am-4:00am is when they show up with the heavy machinery. Unload with other heavy equipment that is loud and then they are gone. They do not keep up their yard. They are not contributing to the Sumner Heights Neighborhood Community.

The second piece I want to bring up is this. They are proposing to change the location of the wrap around driveway, probably to avoid being so close to our house. It needs to be stated that Trucks over a certain weight are not allowed on Sumner Heights Drive East. There is a sign clearly stating this. It is a wonder they were allowed to ever move into our neighborhood and begin commercial/industrial business two years ago when they did.

The last remark I would like to make is for the people who walk the hill. I have watched countless younger families allow their kids to ride their bikes down the hill and then Mom or Dad will be there at the bottom with the family vehicle ready to pick them up and drive them up for another turn. Is this going to be safe when Heavy Machinery is on the same road as children learning to ride scooters and bikes?

Thank you for your time,

Evan Wall
5629 Sumner Heights Dr. East
Edgewood, WA 98372

ewall@escoffier.edu

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Holly Tuininga <htuininga@hotmail.com>
Sent: Tuesday, April 14, 2026 2:35 PM
To: comdev
Subject: NOTICE OF APPLICATION File #25-002-COMP PLAN: Schober Comprehensive Plan Amendment and Rezone

***This message is from an External Sender**

CONCERNING NOTICE OF APPLICATION File #25-002-COMP PLAN: Schober Comprehensive Plan Amendment and Rezone

We have not read the comprehensive plan for the proposal, however at a glance, glaring issues arise just by looking at the crude picture attached to the Notice. There is one road separating the proposed rezoning land from Edgewood Drive AND the well established community of homes sitting practically on top of it. A quick count of about 50 well maintained homes on large lots have made up this wonderful community for longer than 50 years. To date we are enduring plane, train and AUTOMOBILE noise from Hiway 167 that has crept in over those 50 years! The only way in and out of this neighborhood is Edgewood Drive on the north and Sumnerheights Drive on the south. At rush hour in the evening Edgewood Drive can back up the hill for many blocks because cars are taking turns at the stop signs adjacent to the proposed land amendment and rezone. I could go on, however, many of my dear neighbors have sent you comments as well and we are all on the same page. NO TO REONING PLEASE!

Gary and Holly Tuininga
13117 56th Street E
Edgewood, WA 98372
206-914-4047

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Kakai Bojang

From: Jill Schwerzler-Herrera
Sent: Tuesday, April 14, 2026 8:38 AM
To: Josh Kubitza
Subject: FW: #25-002-COMP

FYI

Jill Schwerzler-Herrera
City Clerk/HR Director

From: Jason Ramirez <jason.ramirez@cityofedgewood.org>
Sent: Monday, April 13, 2026 4:59 PM
To: Jill Schwerzler-Herrera <jill@cityofedgewood.org>
Subject: FW: #25-002-COMP

See email below.

Jason Ramirez
Edgewood City Council Position 2
Jason.ramirez@cityofedgewood.org

From: JaCinda Barnes <hyacintheve@hotmail.com>
Sent: Sunday, April 12, 2026 7:52 AM
To: Jason Ramirez <jason.ramirez@cityofedgewood.org>
Subject: #25-002-COMP

***This message is from an External Sender**

To whom it may concern,

Mariah Goyenechea informed me that the zoning laws may be changed to allow trucks to enter her neighborhood. She is an employee in my office. In my last letter sent 8/2/24 I expressed my concern about trucks coming to the location across the street from her at all hours of the day and night. The constant noise and disturbances had a negative impact on her. Re-zoning to allow more trucks would surely disrupt her well-being and productivity. She and other Edgewood residents should be able to rely on a safe, quiet, and stable environment at home to work remotely and to rest peacefully. How can anyone achieve this when faced with air and noise pollution, increased truck traffic and safety hazards?

I humbly ask you to reject the zoning proposal for this area. Please consider the livelihoods of the people in that area and what they will endure if this is allowed. While I do not have a direct connection with this neighborhood, I can clearly see the effect this has on my colleague and her ability to function at her full capacity.

Thank you for your time.

JaCinda Barnes
Seattle, Washington

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: JaCinda Barnes <hyacintheve@hotmail.com>
Sent: Monday, April 6, 2026 7:24 PM
To: comdev
Subject: #25-002-COMP

***This message is from an External Sender**

To whom it may concern,

Mariah Goyenechea informed me that the zoning laws may be changed to allow trucks to enter her neighborhood. She is an employee in my office. In my last letter sent 8/2/24 I expressed my concern about trucks coming to the location across the street from her at all hours of the day and night. The constant noise and disturbances had a negative impact on her. Re-zoning to allow more trucks would surely disrupt her well-being and productivity. She and other Edgewood residents should be able to rely on a safe, quiet, and stable environment at home to work remotely and to rest peacefully. How can anyone achieve this when faced with air and noise pollution, increased truck traffic and safety hazards?

I humbly ask you to reject the zoning proposal for this area. Please consider the livelihoods of the people in that area and what they will endure if this is allowed. While I do not have a direct connection with this neighborhood, I can clearly see the effect this has on my colleague and her ability to function at her full capacity.

Thank you for your time.

JaCinda Barnes
Seattle, Washington

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Jacob Hamilton <jake@virtualsitewalk.com>
Sent: Monday, April 13, 2026 11:52 PM
To: comdev
Subject: Project Number: 25-002-COMP PLAN - Rezone Request

***This message is from an External Sender**

Hello Edgewood Planning. I was made aware of the project to rezone the subject parcels via a message from a neighbor. As someone that presents projects in front of Planning Commissions and Neighborhood Groups for a living, I'm approaching the project from a different perspective than most of the public. However, I do live in Edgewood and know this property and the neighboring property owner quite well. I have the following issues:

1. **The maps in the notice are insufficient.** The map used for the noticing is a parcel map and doesn't include an overhead aerial image with parcel lines. It's extremely difficult for any layman to understand which land is being rezoned without including aerial images with parcel lines superimposed over the property. This map requires crosschecking on Google Earth or another mapping software to understand the land in question.
2. **The public notice sign is north of the Edgewood Drive East split.** The majority of individuals driving this area use Edgewood Drive East and will not see this sign. However, the property also runs below the split and should have been noticed south of the split where it would be significantly more viewed. I'll give the noticing party the benefit of the doubt that this wasn't done on purpose, but when I hire firms to post notice, we are instructed to post in the most visible way possible for that property.
3. **There is a clear distinction between the residentially zoned parcels and the current industrially zoned property.** The geography changes from the industrial area to the residential area and there's a natural change from valley to the hill that was obviously factored into the original zoning of these parcels. The change is not obvious from an overhead map, but on the ground, the parcels in question have always been adjacent to, and part of the residential area. There is literally a home with an active community member 65' NE of the proposed industrial parcel. That's the HOUSE, not just the property.
4. **These parcels have not historically been used for commercial or industrial uses.** The shop was built some years back, but it's not an industrial use. It's been used for storage and keeping material recently, but it's an odd use of a residential lot that did not go unnoticed. Again, there's a clear difference between the Evergreen pre-cast business use and these 2 parcels. If anything, the current use should be returned to a non-commercial use.

5. **The traffic is already terrible at the RR track intersection just SE of this property.** As someone that uses it everyday to take 3 kids to school, I'm often late due to UPRR trains and the corresponding back-up all the way north of this property on Edgewood Drive and Sumner Heights Drive. If there's any action here, it should be working with Sumner and Puyallup to ease the congestion at this intersection. I realize this might seem like a Puyallup and/or Sumner problem to Edgewood officials, but as a daily user, I can assure you it's an Edgewood Citizen problem that's gotten exponentially worse over the last 20 years. If the proposal is approved and these properties are rezoned Industrial, I'm assuming they have access from Evergreen Pre-Cast and not from Sumner Heights Drive. There should not be any Industrial access from Sumner Heights Drive in any capacity.

In summary, this project was poorly noticed and should be continued for that reason alone. Proper maps should be placed on the notice and the signage should be south of the Edgewood Drive East split. Also, there's a clear delineation between the industrial use in the valley and the residential use of these properties and the neighborhood on the hill. There's absolutely no reason for the Industrial use to creep up the hill into the neighborhood when there's already a 100-year-old divide between the valley RR track industrial use and the hillside residential use.

This is NOT a spot zoning case where all the surrounding property has already been zoned Industrial and the mapping/zoning needs to catch up. There is no Hardship being presented that would warrant a rezone or variance of any kind. This land has been Residential and treated as such since the beginning of Edgewood. I would have to include that Edgewood Officials must have a vested stake or interest in seeing the project approved if this moves forward. Please prove otherwise if not. I would love to hear counterarguments to the points I've presented. Thanks.

Jacob Hamilton

Virtual Site Walk LLC

www.virtualsitewalk.com

Jake@virtualsitewalk.com

Mobile: (619) 341-9208

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: jeanrn008@comcast.net
Sent: Sunday, April 12, 2026 7:05 PM
To: comdev
Subject: RE: File #25-002-COMP PLAN

*This message is from an External Sender

Dear Planning Commission and City Council Members,

We are writing as a nearby residents to express strong concerns regarding the proposed Schober Comprehensive Plan Amendment and Rezone (File #25-002-COMP PLAN), which seeks to change the property from a residential designation to industrial. This amendment is incompatible with long-established residential uses of neighboring properties and is inconsistent with the policies and intent of our City's Comprehensive Plan.

More importantly, as a resident of the city of Edgewood, I know that this amendment is contrary to purpose of our city's incorporation, to ensure a sustainable community. Among the many problems with this amendment are the following:

1. The Edgewood comprehensive plan seeks to protect residential neighborhoods and ensure compatibility and appropriate transitions among different land uses. An industrial rezone abutting established single-family homes fails to honor the Plan's intent. Expanding industrial zoning next to these residences brings noise, lighting, emissions, vibration and truck traffic. These things would have a strongly negative impact on residents and contradict the City's stated land-use pattern goals.

The land use harms of the proposed amendment include:

- a. Failing to maintain compatible land use patterns.
- b. Intensify existing traffic congestion at an already congested nearby intersection.
- c. Degrading existing residential areas.
- d. Eroding buffer zones between higher-intensity uses and residential zones.
- e. Seriously damaging the City's small-town residential character as described in the plan vision.

2. Conflicts with the Community Character element of the plan which calls for development to preserve neighborhood identity, maintain buffers, protect public views, reduce intrusive lighting and retain vegetation. While industrial uses exist on Valley Ave, those uses directly contradict the community character sought for Edgewood. The community character harms of the proposed amendment include:

- a. Compromising the existing neighborhood's consistently residential identity
- b. Introducing intense industrial activities inconsistent with existing community character.
- c. Eliminating buffering vegetation critical to protecting the neighborhood.
- d. Introduce intrusive lighting, emissions and noise.
- e. Introducing heavy traffic on country roads poorly suited to industrial activity.

3. Rezoning to this area to industrial use would violate the Natural Environment goals of our community's plan. Industrial uses have grave environmental off-site including pollution of air and groundwater along with adverse impacts associated with traffic, and industrial activity. Of particular concern are risks to slope stability from vibrations associated with industrial activity. A comprehensive plan change like this should undergo a SEPA review. However, even a SEPA review, industrial use will certainly harm the community by introducing:

- a. Traffic impacts
- b. Noise impacts
- c. Vibration impacts
- d. Lighting impacts
- e. Stormwater and water quality impacts
- f. Risks to slope stability
- g. Cumulative neighborhood impacts

4. Rezoning this parcel to industrial use contradicts Edgewood's adopted vision which commits to "Preserving rural small-town character, family friendly neighborhoods, trees, and open spaces." It also calls for land use decisions to maintain environmental and social sustainability. Introducing industrial use into residential neighborhoods would:

- a. Destabilize the neighborhood character.
- b. Deprive families of scarce quality housing.
- c. Undermine vision of environmental sustainability

I request the city deny the Schober Comprehensive Plan Amendment and maintain the existing residential designation. The proposed industrial rezone is not consistent with the City's adopted land use designations, community character, natural environment policies or vision statement.

We appreciate your time and consideration.

Sincerely,

Jean and Kevin Mobley

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Jennifer Holmgren <jennifer.holmgren@gmail.com>
Sent: Monday, April 13, 2026 4:12 PM
To: comdev
Subject: Fwd: Better letter

***This message is from an External Sender**

Cliff and Jennifer Holmgren
5214 126th Ave CT E
Edgewood, WA 98372
Jennifer.Holmgren@gmail.com
4/13/2026

City of Edgewood Planning Department
comdev@edgewoodwa.gov
2224 104th Ave E
Edgewood, WA 98372

Subject: Opposition to Proposed Zoning Change for Parcels: 0420234144 and 0420234111 (5628 and 5626 Sumner Heights Dr)

Dear Planning Commission Members,

I am writing as a resident of Edgewood to respectfully oppose the proposed zoning change for the property located at **Parcels: 0420234144 and 0420234111 (5628 and 5626 Sumner Heights Dr)**. This property has long been designated as residential, and maintaining that designation is important to preserving the character, safety, and livability of our community.

There are several key concerns I ask you to carefully consider:

Increased Traffic Congestion

Our area already experiences congestion, particularly with proximity to SR-167 and surrounding commuter routes. Rezoning this property for construction or non-residential use would significantly increase vehicle volume, exacerbating traffic flow issues and raising safety concerns for residents, pedestrians, and families in a primarily residential setting.

Noise and Light Pollution

A shift away from residential zoning would introduce increased noise levels and artificial lighting that are inconsistent with the current character of the neighborhood. This would negatively impact the quality of

life for nearby residents who rely on the quieter, low-density environment that residential zoning is intended to protect.

Loss of Vegetative Buffer Along SR-167

The existing vegetation on and around this property serves as a critical natural buffer from SR-167. It helps reduce highway noise, improves air quality, and preserves the visual character of the area. Development could significantly diminish or eliminate this buffer, creating long-term environmental and aesthetic impacts for the surrounding neighborhood.

Availability of Appropriately Zoned Land

Within Pierce County and the surrounding areas, there are already parcels designated and zoned for construction and development. It is reasonable to expect that property owners verify zoning compatibility prior to purchase. Approving a rezoning request in this instance would set a concerning precedent and undermine the integrity of the City's comprehensive planning efforts.

For these reasons, I strongly urge the City of Edgewood to deny the requested zoning change and uphold the current residential designation. Doing so supports the City's commitment to thoughtful growth, protects established neighborhoods, and aligns with long-term planning goals.

Thank you for your time and careful consideration of this matter.

Sincerely,
Cliff and Jennifer Holmgren

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: coateswood <coateswood@comcast.net>
Sent: Monday, April 13, 2026 2:35 PM
To: comdev

***This message is from an External Sender**

In terms of the city's values and goals as to future planning, let's be proactive as to the Schober rezone. Explore the possibility of buying the 2 parcels for a city park. The road building company site couldld become a wonderful woodland park; home too majestic trees, bald eagles, and red tailed hawks. Also negotiate with the owner of the adjacent 2 parcelswest to possibly enlarge the park area. New fast growing evergreens could be planted to help filters lot of the ever increasing roudm shaking, and loud noise from the vault company, the railroad, and Valley Avenue traffic.
Jim and Esther Coates

Sent from my Galaxy

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Karan Sandhu <ksandhu6@icloud.com>
Sent: Monday, March 30, 2026 10:38 AM
To: Permit
Cc: comdev
Subject: 25-001 Comp Plan West Valley Hwy E Rezone
Attachments: image0.jpeg; image1.jpeg; image2.jpeg; ATT00001.txt

*This message is from an External Sender

Dear Community Development Department,
Attached please find the signed Declaration of Posting and photographs for Project No. 25-001-COMP PLAN. Two signs have been posted on the subject property within the West Valley Highway Overlay Study Area:

1. One sign mounted on a private structure at the property's driveway entrance.
2. One sign mounted on a private fence along the West Valley Highway E.

Both signs are posted on private structures at least three feet above ground level.

Could you please review the attached photos and confirm that the sign locations and visibility are satisfactory? I want to make sure we are in full compliance with the posting requirements before the April 14 comment deadline.

Thank you for your time. Please don't hesitate to reach out if anything needs to be adjusted.

Respectfully,

Kevin S.

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: KAREN DIEGO <karenlouise1@comcast.net>
Sent: Monday, April 6, 2026 3:42 PM
To: comdev; KAREN DIEGO
Subject: Schober 25-002

***This message is from an External Sender**

City Of Edgewood
COM DEV
10440 Dom Calata Way E
Edgewood WA 98372

Re: File #25-002-COMP PLAN: Schober Comprehensive Plan - Amendment and Rezone

COM DEV - Planning Commission
Re: 5626 & 5628 Sumner Height Dr E / Tax Parcel 04202340000, 0420234144

My name is Karen L Diego. My husband, Sheldon V. Bowlin and I own the property located at 13122 56th St E., Edgewood WA 98372. Our property also borders Sumner Heights. We are **totally against** the rezone from Residential to "Industrial" on the property listed above. The new owner, Mark Schober of M2 Industrial, Ellenburg, WA, bought and started using the property commercially about two years ago moving in equipment and vehicles. The property is zoned Residential. M2 Industrial works large projects over most of Washington State. On purchase, they had Semi's and large Flatbed trucks entering the property, dropping off and loading metal products, creating a very very loud noise level. This would happen between 10pm and 1am the majority of the week Monday through Sunday. Our home is directly across the street on Sumner Heights. We look down on the entire property. They built a new gate on the NE side, on the sharp curve, on Sumner Heights.

The commercial property adjacent to these parcels, Evergreen Septic and Concrete, in business from 1987, located in Sumner, are good neighbors, starting at 7am and closing at 5pm M to F. They make a lot of noise, sometimes, but keep the trees between the business and homes on Sumner Heights in place to cut the noise from their business. Those large well-established trees extend around the proposed Industrial Rezone area. If any are removed, it would cause destabilization of the steep slope they are growing on, adding undue pressure to the steep slopes that Sumner Heights, 56th St E, 56th St Ct E., 131 St Ave E, and 55th St E. homes are on. Sumner Heights just incurred two landslides recently, one on our property and one west of our property. This added to the lack of proper Storm Water Management in this entire area, as acknowledged years ago by Jeremy Metzler, would not make for a safe environment.

Our entire Edgewood neighborhood is residential, not located in Sumner on W Valley Parkway as Evergreen is, allowing its Industrial status. The intersection of Sumner Heights, Edgewood Dr and Evergreen's east exit is an extremely busy area all day, every day, with commute time especially backed up on Edgewood Dr and lower Sumner Heights. On a regular basis, semi trucks, missing the "NO SEMI'S" Sumner signage, to NOT make a left turn, still drive into Edgewood. Our local property values would plummet, if for just one person's request for a rezone in a total residential wooded area,

taking away our lifestyle, home values, long established wildlife and bird habitat for the entire area. How would they handle the noise, dust, traffic, our views, generated from their business? They already showed their colors by running a commercial business in a residential zone at the hours of 10PM to 1AM. **NO TO THE REZONE**

Sincerely,
Karen L Diego and Sheldon V Bowlin

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Karen L. Coates <karcoates@comcast.net>
Sent: Sunday, April 12, 2026 3:07 PM
To: comdev; City of Edgewood Mayor; Jennifer Pazaruski; Jason Ramirez; Christi Keith; Mark Creley; Jason Rasmus; Corbin Edwards; Jeff Southard
Subject: Opposition to Rezone Application File #25-002-COMP Plan: Schober Comprehensive Plan

***This message is from an External Sender**

Karen Coates
5623 131st AVE E
Edgewood WA 98372
253-341-3983
KarCoates@Comcast.net

April 12, 2026

To: Edgewood Planning Commission / Edgewood City Council
Attn: Department of Community and Economic Development
Re: Opposition to Rezone Application File #25-002-COMP Plan: Schober Comprehensive Plan

To the Members of the Commission and Council,

I am writing as a resident of Edgewood to formally express my strong opposition to the proposed rezoning of 5626 & 5628 Sumner Heights Dr E Tax Parcel(s) 04202341111, 0420234144 from Residential to Industrial.

I am living in the home I grew up in since 1967, which was unincorporated Sumner for decades and is now Edgewood. Our family voted for becoming part of the City of Edgewood because we were told the city's main goal would be to stay rural. I have lived in the same home in Edgewood for the majority of my life, and like many of my neighbors, our family chose this community for its quiet, residential atmosphere. In our City's 2024 Comprehensive Plan's Policy of Vision 2050, one area of vision is "Economic development policies support a **distinctive built and natural character and high quality of life** as key economic development drivers." I believe this rezone is inconsistent with that vision for the following reasons:

- **Traffic and Safety:** Our current infrastructure, specifically Sumner Heights Drive E is not designed to handle the increased volume of industrial vehicles this change would bring. This poses a direct safety risk to local pedestrians and children.

In addition, there is not adequate buffer between the proposed industrial zone and our home. Case in point, the illegal industrial use of the land that has occurred to date has caused vibration in our home that is significant enough that our guest (my sister) has been woken up by her bed shaking in the middle of the night. It was confirmed by our neighbors Evan and Mariah at 5629 Sumner Heights Dr E, who live across from the property seeking rezoning, that this is due to the industrial size trucks that are going in and out of the property late at night. They know this because they see them and they

feel the vibration in their home. The interrupted sleep caused by this vibration is very detrimental to a person's health.

Furthermore, we are having increased issues with landslides that make our properties unsafe. It is reasonable to assume this has been exacerbated by the vibration caused by the illegal industrial use of the land. Making the industrial use legal would only increase the occurrence of the vibrations, therefore increasing the negative impact to our safety, health and well-being – our “high quality of life” as stated in Vision 2050.

- **Neighborhood Character:** Introducing an industrial entity into this specific pocket of the city will create significant light pollution, noise, and a loss of privacy for the surrounding homes. Already, the owner of the property has been removing trees and increasing noise pollution. This compounds the problem already present with Sumner's industrial use of adjacent properties. This will make a bad situation much worse.
- **Property Values:** Transitions from residential to industrial use often negatively impacts the market value of adjacent single-family homes. I have been putting significant money into my home the last several years to allow my 80-year-old parents to remain living with me and to make it my forever home. These upgrades do not necessarily increase the value of the home. I will be heartbroken if I have to sell our home due to the issues created with the nearby area rezoning from residential to industrial. I would in essence lose the money I've put into upgrades and on top of that have to sell my home at a lower market value.
- **Environmental Impact:** As stated above, I have great concerns about the vibrations causing landslides as the rezone area includes a steep bank and it is adjacent to a steep bank across the street from our house, so this is an impact that goes beyond my lot and the lot my parents own next door. In addition, we see bald eagles from time to time and many times see red hawks soaring above the trees. We are concerned for the land and the habitat.

I respectfully urge the City to deny this rezone request and uphold the current residential zoning that protects the integrity of our neighborhood.

Thank you for your time and for considering the concerns of the residents who will be most affected by this decision.

Sincerely,

Karen Coates

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Kari Lee Adams <karileeadams@gmail.com>
Sent: Saturday, April 4, 2026 12:00 PM
To: comdev
Subject: Formal Opposition to Schober Comprehensive Plan Amendment and Rezone (File # 25-002-COMP PLAN)

***This message is from an External Sender**

Dear Planning Commission and City Council Members,

I am writing as an immediately affected neighbor and resident to express strong opposition to the proposed Schober Comprehensive Plan Amendment and Rezone (File #25-002-COMP PLAN), which seeks to convert this property from residential to industrial use. This proposal is inconsistent with multiple elements of the City of Edgewood Comprehensive Plan and undermines the long-standing expectations of residents who rely on those policies.

Edgewood's Comprehensive Plan clearly establishes a commitment to preserving a family-oriented, small-town character. The **Vision Statement** affirms the City's intent to "preserve rural, small-town character, family-friendly neighborhoods, trees, and open spaces." This proposal directly conflicts with that vision by introducing industrial use into an established residential area.

1. Land Use Element Conflicts

The Land Use Element emphasizes compatibility between adjacent uses and the importance of maintaining appropriate transitions. Policies within this element call for:

-
- **LU Policy LU-3.1** – Maintain compatibility between adjacent land uses
- **LU Policy LU-3.3** – Require appropriate transitions between differing land use intensities
- **LU Policy LU-5.2** – Protect established residential neighborhoods from encroachment of incompatible uses

Rezoning this parcel to industrial use adjacent to single-family homes fails to meet these standards. It introduces noise, lighting, emissions, vibration, and truck traffic that are incompatible with residential living, directly contradicting the City's land use policies.

2. Community Character Element Conflicts

The Community Character Element calls for development that:

-
- **CC Policy CC-1.1** – Preserve and enhance Edgewood's small-town and residential character
- **CC Policy CC-2.2** – Maintain vegetative buffers between differing land uses
- **CC Policy CC-3.1** – Minimize impacts of lighting, noise, and visual intrusion on residential areas

The existing tree canopy on this site is not incidental; it is a functional and visual buffer that supports these goals. Industrial development would likely remove this vegetation, eliminating a key protective

feature and introducing lighting, noise, and activity levels and traffic that are inconsistent with the surrounding residential neighborhood.

3. Natural Environment Element Conflicts

The Natural Environment Element prioritizes:

-
- **NE Policy NE-1.1** – Protect environmental quality and minimize impacts from development
- **NE Policy NE-2.3** – Preserve significant vegetation and wildlife habitat where feasible
- **NE Policy NE-4.1** – Reduce impacts related to stormwater, erosion, and slope instability

This site currently supports local wildlife, including hawks and eagles that rely on that vally & tree canopy for nesting and hunting. Industrial use would displace this habitat and introduce environmental impacts such as increased stormwater runoff (which we all know is already an issue for us), air pollution, vibration, and noise. In addition, given the site conditions, potential impacts to slope stability and the surrounding areas warrant serious concern and further environmental scrutiny.

4. Existing Environmental Burden and Buffer Loss

Our neighborhood already experiences significant noise from the freeway and train activity. The existing tree line functions as a natural buffer, directly supporting the intent of **CC-2.2** and **NE-2.3**. Its removal, combined with new industrial impacts, would significantly degrade residential livability.

5. Economic Stability and Property Values

The Comprehensive Plan supports stable residential communities. Introducing industrial zoning adjacent to homes undermines that stability and creates a direct risk to property values, conflicting with the intent of **LU-5.2** to protect established neighborhoods.

This proposal is not aligned with the Land Use, Community Character, or Natural Environment elements of the Comprehensive Plan, nor with the City’s stated vision. It represents a fundamental departure from the principles that guide responsible growth in Edgewood.

I respectfully urge the City to deny the Schober Comprehensive Plan Amendment and maintain the existing residential designation in order to protect the character, livability, and long-term stability of this community.

Thank you for your time and consideration.

Sincerely,
Kari L. Adams

13425 56th Street E.

Edgewood, WA 98372

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Laurie pruden <lauriep555@gmail.com>
Sent: Sunday, April 5, 2026 3:35 PM
To: comdev
Subject: Project #25-002-COMP PLAN

***This message is from an External Sender**

To the Edgewood City Council

I am writing to express my opposition to a change in zoning affecting Sumner Heights Drive.

I first got to know about the now named Edgewood in the early 1990's, when it was part of unincorporated Pierce County, known as Sumner Heights. After a year of commuting from Seattle we were interested in finding a home closer to work and learned about an unusual one in Sumner Heights that was about to go on the market.

Following the owner's directions to 12804 53rd St Ct E, we entered at its southern end, drove around a bit, including Sumner Heights Drive which lay below the house, taking in the lush farmland, modest homey cottages, classy mid-centuries, elegant 30s era classics. A great school district and charming town were nearby. Views of "The Mountain" abounded. Even before seeing the house, we were smitten by the location.

Over the years, walking nearly a thousand times down Sumner Heights Drive to the local coffee shop, we remained in love with the community, making some of the most important friendships of our lives.

After 25 years we made the difficult decision to move back to Seattle, closer to family, but our attachment to Edgewood remains. Now, 7 years later when we visit there, the city has grown and developed, but it still seems like home, which is how I came to learn about and feel strongly about the proposed rezoning to allow a construction-related company to set up shop on Sumner Heights Drive.

I can see no harm in people running a tax preparation or consulting business from their homes. But a large construction-related compound in the proposed location is another matter. Noise will be disruptive to nearby homes, large trucks coming and going will interfere with commuter traffic, and make more dangerous foot traffic, including for children coming and going on the Sumner School district designated bus route, a dangerous one already with no sidewalks. And finally, such a business would visually mar a main gateway to the unique gem of the community of Edgewood.

Cities like Edgewood are rare, with the ability to promote both high quality residential living and dynamic areas for businesses and consumers. The proposed business location at the foot of Sumner Heights Drive would clearly be the wrong place.

Please reject this rezoning proposal.

Sincerely,

Laurie Pruden

This is an external email. Please use caution when opening any attachments.

Jeffrey and Lucy Cole

12920 56th ST E

Edgewood, WA 98372

4lucyandme@gmail.com

April 12, 2026

City of Edgewood Planning Commission

2224 104th Ave E

Edgewood, WA 98372

Subject: Opposition to Rezoning of Parcels 0420234144 (5628 Sumner Heights Dr E) and 0420234111 (5626 Sumner Heights Rd E)

Dear Members of the Edgewood Planning Commission,

I am writing to formally oppose the rezoning request submitted for Parcel 0420234144 (5628 Sumner Heights Dr E) and Parcel 0420234111 (5626 Sumner Heights Rd E). After reviewing the location, surrounding land use, and potential impacts, I believe this rezoning would negatively affect neighborhood character, public safety, environmental stability, and the long-term livability of the surrounding community.

1. Incompatibility With Existing Neighborhood Character

The current zoning reflects the established residential nature of the Sumner Heights/Edgewood hillside area. Rezoning these parcels would introduce land uses that are inconsistent with the surrounding homes, lot sizes, and long-standing community expectations. Residents purchased property here with the understanding that zoning protections would remain stable and predictable.

2. Traffic, Safety, and Infrastructure Concerns

Sumner Heights Dr E and Sumner Heights Rd E are narrow hillside roads with limited capacity. They were not designed to support increased traffic volumes, construction activity, or heavier vehicle use. Rezoning that enables higher-density development or non-residential uses would strain emergency access, pedestrian and cyclist safety, on-street parking, roadway durability, and utility and stormwater systems already near capacity.

3. Environmental and Slope Stability Risks

This area includes steep slopes, mature vegetation, and sensitive drainage patterns. Any intensification of land use increases the risk of erosion, slope instability, loss of tree canopy, increased runoff affecting downhill properties, and disruption of wildlife habitat. Given the hillside conditions, rezoning that encourages more intensive development poses unnecessary environmental and geotechnical risks.

4. Lack of Demonstrated Public Benefit

Rezoning should only be approved when it provides a clear, measurable benefit to the broader Edgewood community. In this case, the proposal appears to serve the interests of a single property owner rather than the neighborhood or the city as a whole. The potential harms outweigh any speculative benefits.

5. Precedent for Future Incompatible Development

Approving this rezoning would set a precedent that could encourage additional rezoning requests in the area. This would gradually erode the residential character, stability, and predictability that current zoning is intended to protect.

For these reasons, I respectfully request that the Edgewood Planning Commission deny the rezoning request for parcels 0420234144 and 0420234111.

Thank you for your time, consideration, and commitment to responsible land-use planning.

Sincerely,

Jeffrey and Lucy Cole

Kakai Bojang

From: Mariah Goyenechea <mgoyenechea@aol.com>
Sent: Tuesday, March 31, 2026 8:38 AM
To: comdev
Subject: Re: Rezoning Plan

***This message is from an External Sender**

Thank you!

Mariah Goyenechea

On Mar 31, 2026, at 7:25 AM, comdev <comdev@cityofedgewood.org> wrote:

Mariah

Your messaged is received and will be added to our records.

Thank you

From: Mariah Goyenechea <mgoyenechea@aol.com>
Sent: Friday, March 27, 2026 2:23 PM
To: comdev <comdev@cityofedgewood.org>
Subject: Rezoning Plan

***This message is from an External Sender**

Hi,

My name is Mariah Goyenechea. I am writing this email to express my concerns with the proposed rezoning property at 5628/5626 Sumner Heights Dr. E. This rezoning does not benefit the public health, safety, or welfare of the neighbors who live on this hill. The increased truck access will bring more environmental pollution (worsen air quality for residents), increased noise pollution (usage of compression breaks), and decreased home values. Not to mention, the risks that involved with incompatible land use in established neighborhoods, which could erode the overall zoning framework.

I respectfully request the City deny the rezoning of the property at 5628/5626 Sumner Heights Dr E. I would also request to preserve zoning regulations that safeguards the integrity of the neighborhood and the residents that reside there.

This is directly adjacent from the homes that are on Sumner Heights Dr E. The noise from the trucks that occurred in the past has happened as early as 7am and 7pm. I am happy to provide documentation if needed.

Mariah Goyenechea

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Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

Kakai Bojang

From: Mariah Goyenechea <mgoyenechea@aol.com>
Sent: Saturday, March 28, 2026 7:20 AM
To: comdev
Subject: Supplemental Materials – Public Comment on Rezoning (Sumner Heights Dr E)
Attachments: image0.jpeg; image1.jpeg; image2.png; Video.mov; ATT00001.txt

*This message is from an External Sender

Dear City of Edgewood,

I am following up on a previous email I had sent with photo and video documentation that demonstrates the concerns that arise from rezoning 5628/5626 Sumner Heights Dr E.

The attached photos and video show semi-truck and heavy equipment activity adjacent to a residential home. These photos and video were taken at different dates and times. These pictures highlight the concerns with noise, safety, and compatibility with the neighborhood.

While minimal set backs may be considered they are not sufficient to mitigate reality of the real-world impacts such as truck noise, vibrations, diesel emissions, and safety risks.

The materials provided further demonstrate the impacts industrial type activity and that it could intensify if zoning is approved. I respectfully request these photos and video become part of the official record and are part of the evaluation.

Photo 1: Semi truck transporting heavy materials in front of residential home.

Photo 2: Multiple semi trucks during evening hours.

Photo 3: Semi truck adjacent from home, driveway, and parked car in driveway.

Video 1: Taken at 7am on a Saturday. Demonstrates the noise pollution and activity adjacent from homeowners yard.

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Melissa Schiemer <majksreign@gmail.com>
Sent: Tuesday, April 14, 2026 12:28 PM
To: comdev
Subject: Public Comment: REF122546 - 25-002-COMP PLAN

***This message is from an External Sender**

To Whom it May Concern:

In general I am not a proponent of rezoning the property located at 5628 SHD on parcel number 0420234144 from residential to industrial.

Some specific concerns include, but are not limited to:

*** Additional traffic congestion**

This is a broad concern regarding: the current driveway access point, the overall impact on larger vehicles traversing Sumner Heights Drive, and the congestion near two challenging intersections - the convergence of SHD and Edgewood Dr and the stoplight/Railroad Crossing. Each intersection is uniquely affected by commuter congestion, traffic issues on 167/West Valley, and ultimately trains. Back ups at Cannery Way and Main/Fryer/Traffic Ave ('No Turn on Red') have frequently rippled up and around the base of 'North Hill'.

*** Noise/Light Pollution**

With Industrial zoning residents can expect additional unmuffled sounds from vehicles/equipment, etc. In conjunction, it would be assumed that property/vehicle lights will be in use. These additional 'pollutants' may be seen/heard beyond the general vicinity, detracting from the current 'neighborhood' feel.

*** Deterioration of the Vegetative Buffer**

Along with the aforementioned light/sound, the buffer of trees and vegetation in that area is impactful. Not only does it filter light/sound but mitigates water/rainfall.

Thank you for your time,
Melissa Schiemer

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: pastorjuliewyatt@comcast.net
Sent: Tuesday, April 14, 2026 1:12 PM
To: comdev
Subject: Comp Plan and Rezone Request

***This message is from an External Sender**

Re: Project Number: 25-002-Comp Plan
5626 Sumner Heights Dr. E. Edgewood

Dear planning commission,

We have resided on Sumner Heights Drive since 2002. Our neighborhood is a diverse community of people, houses, incomes and lifestyles, but we all enjoy Sumner Heights Drive. From the bottom of the hill at the proposed re-zone address is a lovely piece of residential farmland with a large green pasture, trees, and fruit trees. Over the years this property was used to pasture horses, goats, and chickens. The water drain-off from the hill above flows under Sumner Heights Drive and forms a small creek into the pasture. A large number of residents who either live on Sumner Heights Dr or adjoining streets walk regularly. It is a lovely, peaceful, wooded street. The residents of our neighborhood, including me, often pick up trash along the side of the road, discarded by vagrants or non-caring drivers. We are invested in keeping our neighborhood clean and pleasant. Additionally, the people who live on Sumner Heights Drive and surrounding neighborhoods are paying very high property taxes. Allowing an industrial re-zone will lower the value of our homes.

In recent years, at the loss of this piece of property (5626) by the original homeowner, new owners took over the property, and the residents of our neighborhood had to watch as the new commercial property owner turned a once serene property into a junky storage lot of building supplies and large vehicles and bulldozed all the landscaping.

It now appears there are potential new owners who want to make this property even worse.

This is the APPROACH to our homes. We drive on this route every day. We walk Sumner Heights Drive, we ride bikes, take our kids on walks, have family and friends gather at our homes. It is of Utmost importance to all who live in this neighborhood to preserve this piece of land as residential.

The residents of this neighborhood REJECT this proposal to rezone 5626 to an industrial zone. Please protect our neighborhood from a hideous industrialized renovation of this land.

Allowing this re-zoning does not align with the core values of the City of Edgewood.

'Edgewood WA, emphasizes a community-focused environment centered on safety, environmental stewardship, and inclusivity. Key values include protecting trees and open space, providing family-friendly services, and fostering a diverse, equitable community.'

Thank you for your consideration to protect our neighborhood and to honor the core values of Edgewood and its residents.

Sincerely,
A passionate neighbor from Sumner Heights Drive East

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Paul Vanderhoof <pfvanderhoof@yahoo.com>
Sent: Sunday, April 12, 2026 12:15 PM
To: comdev
Subject: Re. rezoning

***This message is from an External Sender**

Please consider this an objection to rezoning near our neighborhood on Edgewood Drive and Sumner Heights. We are already tired of all the container truck traffic going through surface streets to get to warehouses. It is loud, dangerous, and annoying especially when trying to drive through. Please don't allow this rezoning.
Paul Vanderhoof and Pam Cook

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Phil Harris <phil.mvpyouth@gmail.com>
Sent: Saturday, April 4, 2026 6:31 PM
To: comdev
Subject: Comments: Project 25-002-Comp Plan

***This message is from an External Sender**

Dear Mayor, Planning Commission and City Council Members,

Subject: Comp Plan and Rezone Request
Project number: 25-002-Comp Plan
Parcel: 0420234144, 0420234111

I am writing as a deeply concerned homeowner/neighbor, taxpayer, father of three children, and active member of this community to strongly oppose the proposed conversion of a residential property into a commercial use within our neighborhood. This decision carries weight far beyond a single parcel. It establishes precedent. Once residential zoning is compromised, it becomes increasingly difficult to deny similar requests in the future. What is presented today as a one-off exception becomes the foundation for continued encroachment. This is not speculation, it is the predictable progression of land use decisions that lose alignment with long standing planning principles. The consequence is gradual but irreversible erosion of the very character that defines Edgewood.

The City of Edgewood has been clear in its identity. It is a place intentionally designed to preserve a small town, family centered environment. Residents choose to live here because of that commitment. Allowing commercial activity to penetrate established residential areas directly conflicts with that ethos and signals a shift away from the values that have guided thoughtful growth. My home is 100 years old. Not once has a neighboring parcel been granted commercial zoning status during the lifetime of my home; this city Council holds both the burden and responsibility to ensure status quo is not disrupted.

From an environmental standpoint, this conversion introduces risks that extend well beyond the property line. Increased impervious surfaces, higher traffic volumes, and potential emissions place additional strain on an already sensitive ecosystem. Existing vegetation and tree canopy serve as natural buffers for noise, air quality, and stormwater management. Their removal or degradation weakens those protections and accelerates runoff, erosion, and habitat disruption. Wildlife that currently depends on this corridor will be displaced, and once lost, these environmental assets are not easily restored.

Socioeconomically, the long term implications are equally concerning. Residential stability is built on predictability and trust in zoning protections. Introducing commercial use into a neighborhood environment disrupts that stability and creates downward pressure on property values. Families who have invested their resources and futures into this community should not bear the financial consequences of a decision that alters the foundational character of their neighborhood.

Safety must also be addressed with clarity. Commercial activity brings increased traffic, delivery vehicles, unfamiliar visitors, and extended hours of operation. These are not compatible with residential streets designed for low volume, predictable use. Children walking, biking, and playing in these

neighborhoods are placed at greater risk when traffic patterns shift from local to commercial. This is a preventable outcome, not an unavoidable one.

Perhaps most important is the broader principle at stake. Zoning exists to provide clarity, consistency, and protection. When those boundaries are blurred, confidence in the system erodes. Residents begin to question whether the standards they rely on will continue to hold. That uncertainty alone has lasting consequences for community cohesion and trust in local governance.

This proposal does not align with the spirit or intent of Edgewood's planning framework. It undermines environmental stewardship, threatens neighborhood safety, destabilizes property values, and sets a precedent that will be difficult to contain once established.

I urge you to take a firm and disciplined position by denying this proposal and maintaining the existing residential designation. In doing so, you preserve not only a neighborhood, but the integrity of the City's long term vision.

Thank you for your time and consideration.

Sincerely,

Phil Harris

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Phil Harris <phil.mvpyouth@gmail.com>
Sent: Saturday, April 4, 2026 6:21 PM
To: comdev; City Council; City of Edgewood Mayor; bflint@cityofedgewood.org; jmartin@cityofedgewood.org; cthomas@cityofedgewood.org; rschmidt@cityofedgewood.org; jhines@cityofedgewood.org; mrose@cityofedgewood.org
Subject: Comments: Project 25-002-Comp Plan

***This message is from an External Sender**

Dear Mayor, Planning Commission and City Council Members,

Subject: Comp Plan and Rezone Request

Project number: 25-002-Comp Plan

Parcel: 0420234144, 0420234111

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Thank you for your time and consideration.

Sincerely,

Phil Harris

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Kakai Bojang

From: comdev
Sent: Friday, April 10, 2026 9:34 AM
To: Sonihal Singh
Subject: RE: Rezone Comments

Good Morning,

Thank you for your comments for the record. You have been added as a Party of Record and will be informed of any public hearing and decisions.

Thank you,
Josh



Josh Kubitza, AICP | Planning Manager

10440 Dom Calata Way E, Edgewood, WA 98372

Direct: 253-392-2558 | **City Hall:** 253-952-3299

<http://cityofedgewood.org>

Office Hours: Monday through Thursday, 7:00 am to 3:30 pm.

Remote on Fridays.

NOTICE OF PUBLIC DISCLOSURE: This e-mail is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this e-mail, in whole or in part, may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

From: Sonihal Singh <sonihalsingh25@gmail.com>
Sent: Wednesday, April 8, 2026 9:33 PM
To: comdev <comdev@cityofedgewood.org>
Subject: Rezone Comments

***This message is from an External Sender**

The properties in the West Valley Highway Study Area are suitable for industrial development as-is, without need for variances. The parcels are large, flat, and have direct frontage on a major arterial corridor with proximity to SR-167 and freight infrastructure. The physical characteristics of this land — large lot sizes, arterial access, valley floor topography — are ideally suited for industrial use, not residential.

This is an external email. Please use caution when opening any attachments.

Kakai Bojang

From: Teddy Otero <TeddyO@sabey.com>
Sent: Tuesday, March 31, 2026 10:32 PM
To: comdev
Subject: Opposition to File #25-002 – Comprehensive Plan Amendment and Rezone

***This message is from an External Sender**

To whom it may concern,

We live directly adjacent to the parcel included in File #25-002 (Schober Comprehensive Plan Amendment and Rezone), and we want to clearly state that we oppose the proposed change from residential to industrial.

This is not a small adjustment. It would fundamentally change the character of our neighborhood. This area is fully residential and actively lived in throughout the day. Between families and retirees, people are home all day, not just mornings and evenings. Industrial traffic, noise, and operations would happen at the same time as everyday life.

A few specific concerns:

- **Traffic and safety:** Industrial use will bring truck traffic onto roads that were never designed for it. Kids are outside, people are walking, and this significantly alters that dynamic.
- **Noise and operations:** Industrial activity would occur throughout the day when people are home, so noise and operations would not be occasional. They would be constant and directly felt by neighboring homes. There is already industrial use further out, and even at that distance, buffered by trees, it is frequently noticeable. This proposal removes that buffer and brings those impacts directly next to homes.
- **No real transition or buffer:** This puts industrial use directly next to residential properties without meaningful separation. That is a clear mismatch.
- **Property values and long-term impact:** This kind of adjacency affects how people view and invest in their homes. It has real long-term consequences.

There is also a broader concern here. Edgewood has historically maintained a low-density, residential character with clear separation between uses. Introducing industrial zoning into an established neighborhood breaks that pattern and opens the door for further encroachment over time.

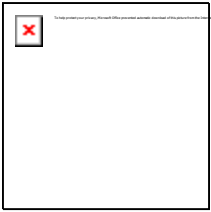
At a minimum, this would require serious buffering and traffic mitigation to even be considered. In its current form, we strongly oppose the proposal.

Please include this comment in the official record.

Sincerely,

Teddy & Jenny Otero

13208 56th St E, Edgewood, WA 98372



Teddy Otero

[Book a meeting with me](#)

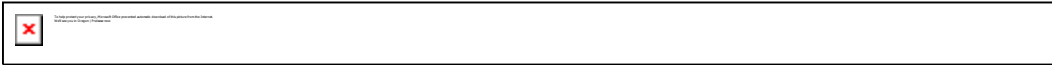
Director of Marketing and Communications



O 206-277-5202

M 719-229-4177

E teddyo@sabey.com



This is an external email. Please use caution when opening any attachments.

CITY OF EDGEWOOD § 18.70.050 Land use table.

Legend (EMC § 18.70.040(A)) ✓ Permitted Use — Prohibited Use A Requires AUP CUP Requires CUP		Mixed Residential 1	Industrial	Schober Limited Use Proposal	Notes
Land Use Category	NAICS Code	MR-1	I	I	All Uses Subject to Conditions 1 and 6
RESIDENTIAL					
Detached Dwelling	Special	✓	—	—	
Accessory Dwelling Unit (ADU)	Special	✓	—	—	See EMC § 18.90.190 for ADU requirements. ADUs are allowed secondarily in TC and C zones only when paired with a townhouse use.
Cottage Housing	Special	✓	—	—	
Courtyard Apartments	Special	✓	—	—	
Duplex	Special	✓	—	—	
Stacked Flats	Special	✓	—	—	
Multi-plex (tri-, four-, five-, six-)	Special	✓	—	—	
Townhouse	Special	✓	—	—	See Ordinance 25-0676 (https://www.cityofedgewood.org/453) for TC and C zones. In the BP zone, this use is only allowed within 1,000 feet of the Interurban Trail.
Apartment	Special	—	—	—	See Ordinance 25-0676 (https://www.cityofedgewood.org/453) for TC and C zones. In the BP zone, this use is only allowed within 1,000 feet of the Interurban Trail.
Adult Family Home	623990. part	✓	—	—	In accordance with RCW 70.128.010(1), as amended
Nursing and Residential Care Facilities	6231; 6232	CUP	—	—	Only permitted in MR-1 if located on a Arterial or Collector road. This use is considered residential for mixed use determinations.

CITY OF EDGEWOOD § 18.70.050 Land use table.

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Land Use Category	NAICS Code	MR-1	I	I	All Uses Subject to Conditions 1 and 6
Assisted Living Facilities	6233	CUP	—	—	Only permitted in MR-1 if located on a Arterial or Collector road. This use is considered residential for mixed use determinations.
Live/Work Unit	Special	A	—	—	Only permitted in MR-1 if located on a Arterial or Collector road. This use is considered residential for mixed use determinations.
Work/Live Unit	Special	—	—	—	
Permanent Supportive Housing		✓	—	—	
Transitional Housing		✓	—	—	
AGRICULTURE AND RESOURCE (Sector 11-21)					
Agricultural Sales	Special	✓	✓	✓	
Crop Production	111, part	A	A	A	
Marijuana Production	111; Special	—	—	—	See Condition 2
Crop Production, All Other	111, part	—	✓	✓	
Animal Production, Personal	112, part	✓	—	—	Only permitted as an accessory use to a primary residential use.
Hog and Pig Farming	112210	—	—	—	Personal animal uses are permitted in all zones per EMC §18.100.030.
Cattle Feedlots	112112	—	CUP	—	
Animal Production and Aquaculture, All Other	112 except 112210; 112112; 112511, part	—	✓		
Mining, Quarrying, and Oil and Gas Extraction	21	—	—	—	Unless otherwise authorized or permitted by the state where city of Edgewood is preempted from regulating
UTILITIES (Sector 22)					

CITY OF EDGEWOOD § 18.70.050 Land use table.

Legend (EMC § 18.70.040(A)) ✓ Permitted Use — Prohibited Use A Requires AUP CUP Requires CUP		Mixed Residential 1	Industrial	Schober Limited Use Proposal	Notes
Land Use Category	NAICS Code	MR-1	I	I	All Uses Subject to Conditions 1 and 6
Electric Power Generation	22111, except 221114 and 221115	CUP	CUP	CUP	Not applicable to small-scale, independent residential units or single-building power supply units
Solar Electric Power Generation	221114	A	✓	✓	
Wind Electric Power Generation	221115	✓	A	—	
Potable Water Treatment	221310, part	CUP	CUP	CUP	
Sewage Collection or Treatment Facility	221320, part	CUP	CUP	CUP	
Wireless Communication Facilities	517312; 517919, part				
MANUFACTURING (Sector 31-33)					
Animal Slaughtering and Processing	3116	—	—	—	
Marijuana Processing	Special	—	—	—	See Condition 2
Manufacturing, Craft	Special	—	✓	✓	
Manufacturing, Light	23, part; 311 except 3116; 312; 313; 314; 315; 316; 337	—	✓	✓	
Manufacturing, Heavy	23, part; 321; 322; 323; 324; 325; 326; 327; 331; 332; 333; 334; 335; 336; 339	—	CUP	—	
WHOLESALE AND RETAIL TRADE (Sector 42, 44-55)					
Wholesale Trade	423; 424; 425	—	✓	✓	
Automobile and Other Motor Vehicle Dealers	4411; 4412	—	A	A	
Gasoline Stations	447	—	✓	✓	Use is limited to 25,000 square feet of total site area per zone in the MUR and C zones (total site area includes all accessory and ancillary uses)
Alternative Fueling Stations	Special	—	✓	✓	

CITY OF EDGEWOOD § 18.70.050 Land use table.

Legend (EMC § 18.70.040(A)) ✓ Permitted Use — Prohibited Use A Requires AUP CUP Requires CUP		Mixed Residential 1	Industrial	Schober Limited Use Proposal	Notes
Land Use Category	NAICS Code		MR-1	I	
Pet and Pet Supplies Stores	453910	—	✓	✓	All Uses Subject to Conditions 1 and 6
Fuel Dealers	454310	—	CUP	CUP	
Marijuana Retailers	453998, part	—	—	—	See Condition 2.
Sexually Oriented Retail Businesses	Special	—	A	—	Subject to standards provided in EMC § 18.100.100
Retail Trade, All Other	All Other 44; 45	—	✓	✓	
TRANSPORTATION AND WAREHOUSING (Sector 48-49)					
Pipeline Transportation	486	See Note			
Transportation, All Other	48 except 486	See Note			
WAREHOUSING AND STORAGE					
Mini-Warehouses and Self-Storage Units	53113	—	✓	✓	
Warehousing and Storage, All Other up to 50,000 sq. ft.		—	✓	✓	
Warehousing and Storage, All Other 50,001 sq. ft and greater		—	✓	✓	
BUSINESS AND PROFESSIONAL SERVICES (Sector 51-56)					
General	All Office Use, plus; 51 except 517; 52; 533; 54 except 541940; 55; 561; 813	—	A	A	
Wedding and Special Occasion Venues and Events	Special	A	A	A	
Passenger Car Rental and Leasing	53211	—	✓	✓	
Truck, Utility Trailer, and RV Rental and Leasing	53212	—	✓	✓	Use is limited to no more than four rental units per site in the C zone.
Consumer Goods Rental	5322; 5323, part	—	✓	✓	

CITY OF EDGEWOOD § 18.70.050 Land use table.

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Land Use Category	NAICS Code	MR-1	I	I	All Uses Subject to Conditions 1 and 6
Commercial and Industrial Equipment Rentals	5323, part; 5324	—	✓	✓	
Waste Management and Remediation Services, All Other	5622, part; 5629	—	CUP	CUP	
EDUCATIONAL SERVICES (Sector 61)					
Elementary and Secondary Schools	6111	CUP	CUP	CUP	
Junior Colleges, Colleges, Universities, and Professional Schools	6112; 6113; 6114	—	CUP	CUP	
Technical and Trade Schools	6115	—	A	A	
Educational Services, All Other	6116; 6117	—	CUP	CUP	
HEALTH CARE AND SOCIAL ASSISTANCE (Sector 62)					
Ambulatory Health Care Services, All Other	All Other 621	—	CUP	CUP	
Hospitals	622	—	CUP	CUP	
Community Care & Walk-in Clinics	Special	—	✓		
Services for the Elderly and Persons with Disabilities	624120	A	CUP	CUP	
Vocational Rehabilitation Services	624310	CUP	CUP	CUP	
Child Daycare Services, Home-Based	624410, part	✓	—	—	Subject to standards provided in EMC § 18.100.040, and requires an applicable Home Business Permit.
Child Daycare Services, All Other	624410, part	A	A	A	Subject to standards provided in EMC § 18.100.040
Social Assistance, All Other	All Other 624	—	CUP	CUP	
Emergency Housing		—	✓	✓	
Emergency Shelter		—	✓	✓	

CITY OF EDGEWOOD § 18.70.050 Land use table.

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Land Use Category	NAICS Code	MR-1	I	I	All Uses Subject to Conditions 1 and 6
ARTS, ENTERTAINMENT, AND RECREATION (Sector 71)					
Libraries	Special	A	A	A	
Museums and Art Galleries	712 except 712130	A	A	A	
Zoos, Aquariums, and Botanical Gardens	712130	—	✓	✓	
Golf Courses and Country Clubs	713910	A	✓	✓	
Sexually Oriented Entertainment	Special	—	CUP	—	Subject to standards provided in EMC § 18.100.100
Gambling Industries	7132	—	✓	✓	
Indoor Arts, Entertainment, and Recreation Activities, Other	Special	CUP	A	A	
Outdoor Arts, Entertainment, and Recreation Activities, Other	Special	A	—	—	
ACCOMMODATION (Sector 721)					
Hotels (except Casino Hotels) and Motels	721110	—	—	—	
Bed-and-Breakfast Inns	721191	A	—	—	
Short-Term Rentals	Special	✓	—	—	
RV Parks and Recreational Camps	7212	A	A	A	
FOOD SERVICE AND DRINKING PLACES (Sector 722)					
Special Food Services	7223 except 722330	See Note	—	—	
Mobile Vendors	722330	A	✓	✓	In R-1, R-2, and MR-1, only permitted within 600 feet of a street corner and fronting on a Collector or Arterial road.
Drinking Places for Alcoholic Beverages	722410	A	✓	✓	Subject to regulation and classification by

CITY OF EDGEWOOD § 18.70.050 Land use table.

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Land Use Category	NAICS Code	MR-1	I	I	All Uses Subject to Conditions 1 and 6
					the Washington State Liquor and Cannabis Board. In R-1, R-2, and MR-1, only permitted within 600 feet of a street corner and fronting on a Collector or Arterial road.
Restaurants, Full Service	722511	A	✓	✓	In R-1, R-2, and MR-1, only permitted within 600 feet of a street corner and fronting on a Collector or Arterial road.
Restaurants, Limited Service	722513; 722514	A	✓	✓	Subject to compliance with drive-up windows (special) use, if also applicable. In R-1, R-2, and MR-1, only permitted within 600 feet of a street corner and fronting on a Collector or Arterial road.
Snack and Nonalcoholic Beverage Bars	722515	A	✓	✓	Subject to compliance with drive-up windows (special) use, if also applicable. In R-1, R-2, and MR-1, only permitted within 600 feet of a street corner and fronting on a Collector or Arterial road.
SERVICES (Sector 811-812)					
Personal Care Services	8121; 812310; 8123200	A	✓	✓	In R-1, R-2, and MR-1, only permitted within 600 feet of a street corner and fronting on a Collector or Arterial road.

CITY OF EDGEWOOD § 18.70.050 Land use table.

Legend (EMC § 18.70.040(A)) ✓ Permitted Use — Prohibited Use A Requires AUP CUP Requires CUP		Mixed Residential 1	Industrial	Schober Limited Use Proposal	Notes
Land Use Category	NAICS Code	MR-1	I	I	All Uses Subject to Conditions 1 and 6
Automotive Oil Change and Lubrication Shops	811191	—	✓	✓	
Car Washes	811192	—	✓	✓	
Automotive Repair and Maintenance, All Other	All Other 8111	—	✓	✓	
Other Repair and Maintenance, Consumer	811 except 8111	—	✓	✓	
Other Repair and Maintenance, Commercial/Industrial	811 except 8111	—	✓	✓	
Funeral Homes and Funeral Services	812210	A	✓	✓	In R-1, R-2, and MR-1, only permitted within 600 feet of a street corner and fronting on a Collector or Arterial road.
Crematoria	812220, part	—	CUP	CUP	
Kennels	Special	—	A	A	
Veterinary Services	541940	A	A	A	Only permitted in residential zones and MR-1 as an accessory use to a primary residential use.
Pet Care Services, All Other	812910, part	A	A	A	Only permitted in residential zones and MR-1 as an accessory use to a primary residential use.
CIVIC AND PUBLIC USES (Sector 813)					
Cemeteries	812220, part	A	—	—	
Correctional Institutions	922140	—	—	—	
Administrative Public Facility	92 except 922140	—	✓	✓	
Nonadministrative Public Facility	Special	—	—	—	Activities with Outside Storage also subject to EMC § 18.90.120

CITY OF EDGEWOOD § 18.70.050 Land use table.

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Land Use Category	NAICS Code	MR-1	I	I	All Uses Subject to Conditions 1 and 6
Parks, Open Space, and Public Recreation	Special	✓	A	A	
Up to 10,000 sq. ft.	813110, Assembly Only	✓	✓	✓	
10,000 to 19,999 sq. ft.	813110, Assembly Only	A	—	—	
20,000 to 29,999 sq. ft.	813110, Assembly Only	A	—	—	
30,000 to 39,999 sq. ft.	813110, Assembly Only	A	—	—	
40,000 sq. ft. or greater	813110, Assembly Only	—	—	—	
OTHER USES					
Parking Lots	812930, part	—	CUP	CUP	As a principal use, no more than 25,000 square feet of total parking area per lot or contiguous ownership in MUR or C zoning districts, except for Transit agency park-and-rides or public parks and services. Permitted as an accessory use without an AUP in all zones.
Parking Structures	812930, part	—	A	A	Permitted as an accessory use without an AUP in all zones
Drive-Up Windows	Special	—	✓	✓	Window shall not face a public ROW and facility must be screened from ROW
Outside Displays	Special	—	✓	✓	Activities also subject to EMC § 18.95.030(I)
Outside Storage	Special	—	A	A	Allowed as incidental use in Public district. Activities also subject to EMC § 18.90.120

CITY OF EDGEWOOD § 18.70.050 Land use table.

Conditions:

- (1) Operations shall not disseminate dust, fumes, gas, noxious odor, smoke, glare, or other atmospheric influence beyond the boundaries of the site, property, or parcel on which such use is located.
- (2) Subject to regulation and classification by the Washington State Liquor and Cannabis Board, where applicable and must comply with Edgewood City Ordinance Nos. 11-356, 13-410, 14-425 and/or 17-502; plus any regulations regarding cannabis in Chapter 69.51A RCW or I-502.
- (3) Subject to Washington Utilities and Transportation Commission regulations and the federal Pipeline and Hazardous Materials Safety Administration (PHMSA). As allowed under state or federal regulations, any use(s) or appurtenances subject to local municipal control will require a CUP in all zoning districts.
- (4) NAICS Subsector Codes 481-485 and 487 (Air Transportation; Rail Transportation; Water Transportation; Truck Transportation; Transit and Ground Passenger Transportation; and Scenic and Sightseeing Transportation) permitted as services or systems, to include necessary support activities. The physical location of facilities, maintenance grounds, offices, or other structures incidental to the service or system is subject to the use regulations for said structure.
- (5) Essential public facilities are subject to EMC § 18.50.060, Essential public facilities permit.
- (6) Subject to EMC § 18.100.030, Animals.



CITY OF EDGEWOOD STAFF REPORT PLANNING COMMISSION AGENDA ITEM

Date: June 8, 2026

Title: West Valley Highway Comprehensive Plan and Zoning Map Amendment (25-001-COMP PLAN)

Attachments:

- Attachment A. Current Zoning Map with Study Area
- Attachment B. Applicant Proposed Future Land Use Map
- Attachment C. Applicant Proposed Zoning Map
- Attachment D. West Valley Highway Draft Land Use Study
- Attachment E. Impacted Parcels List
- Attachment F. Notice of Application Public Comments
- Attachment G. 2025 Agency Comments

Submitted By: Josh Kubitza, AICP – Planning Manager

Introduction and Policy Analysis:

In accordance with RCW 36.70A.130 of the Growth Management Act (GMA), cities may consider amendments to their comprehensive plans no more than once annually. The City of Edgewood City Council has established a process and criteria for making amendments to the City's Comprehensive Plan under EMC Chapter 18.60.

On February 24, 2026, the City Council approved the final annual docket via Resolution no. 26-0788. The resolution directed the Edgewood Planning Commission to review and consider the 25-001-COMP PLAN amendment application to rezone the West Valley Highway (WVH) Overlay Area to Industrial as recommended in the 2025 West Valley Highway Final Land Use Study. The Edgewood Planning Commission was directed to complete its review, to conduct such public hearings as may be required, and to forward its recommendation to the Edgewood City Council prior to the deadline established in RCW 36.70A.130, as existing (December 31, 2026) or as amended.

Tentative Schedule:

February 10, 2026 – Planning Commission Public Hearing on Preliminary Docket

February 25, 2026 – City Council Resolution No. 25-0768 Final Docket

June 8, 2026 – Planning Commission Introduction and Discussion

July 13, 2026 – Planning Commission Discussion

July 19, 2026 – SEPA Issuance and Comment Period

August 10, 2026 – Planning Commission Public Hearing

September 14, 2026 – Planning Commission Discussion
October 6, 2026 – City Council Study Session Introduction
October 27, 2026 – City Council Regular Meeting and Potential Action

Process and Criteria:

The process for amending the City Comprehensive Plan is specified in the Edgewood Municipal Code section 18.60 and in the state Growth Management Act (GMA) (RCW 36.70A) and the State Environmental Policy Act (SEPA). Only those amendments which are found to be in substantial compliance with all criteria listed below shall be approved (EMC 18.60.220.A):

1. Whether the proposed amendment(s) conform to the Growth Management Act (Chapter 36.70A RCW);
2. Whether the proposed amendment(s) are consistent with and implement the city's comprehensive plan, including the goals, policies and implementation strategies of the various elements of the plan;
3. Whether circumstances related to the proposed amendment(s) and/or the area in which it is located have substantially changed since the adoption of the city's comprehensive plan;
4. Whether the assumptions upon which the city's comprehensive plan is based are no longer valid, or whether new information is available which was not considered during the adoption process or any annual amendments of the city's comprehensive plan; and
5. Whether the proposed amendment(s) reflects current, widely held values of the residents of the city.

Description of Proposal:

The following includes the applicant's proposal and the city's proposed alternative:

Applicant Proposal 25-001-COMP PLAN (Alternative 1): Redesignate the Comprehensive Plan Future Land Use Map and Current Zoning Map designations within the West Valley Highway Overlay Area from Residential/Commercial to Industrial as recommended by the 2025 West Highway Final Land Use Study done by SCJ Alliance on behalf of the City of Edgewood (Exhibit A and B). The proposal would redesignate 185.02 acres from Residential-1 (R-1) to Industrial (I), 23.91 acres from Commercial (C) to Industrial (I), and leave the 30.82 acres of Public (P) zoned property alone.

City Proposal (Alternative 2): Modify the applicant's request by adding an Industrial Reduction Overlay to the future land use map redesignation and rezone proposal. This overlay will further restrict industrial land uses and incorporate required SEPA mitigation measures.

Public & Agency Comment:

Public comments were received during the notice of application which are contained in Exhibit E. The agency comments provided in 2025 are contained in Exhibit F. The following summarizes the general comments:

- General noise, light, traffic, and air quality concerns,
- Impact to existing residential property values in and surrounding the West Valley Highway Overlay Area,
- Incompatibility with neighborhood with western neighborhoods,
- The corridor is no longer compatible as a residential neighborhood.

There will be another comment period associated with the SEPA determination and Planning Commission Public Hearing to be completed later.

SEPA Environmental Review:

City staff are conducting an environmental review of the proposed comprehensive plan amendment and rezone alternatives. At this time, staff is likely to request the following SEPA mitigation measures:

- A 100-foot natural buffer along the western edge of the overlay area is required to preserve the natural vegetation and residential views while also providing a natural noise and air quality buffer.
- Type IV, 25-foot Solid Barrier landscaping is required between proposed industrial uses and any existing, adjacent residential uses.
- Future industrial development proposed within 500 feet of residentially zoned properties shall submit a project-specific Community Noise Impact Assessment demonstrating compliance with Edgewood Municipal Code (EMC) Chapter 8.20. This assessment shall evaluate stationary equipment, outdoor loading dock operations, and material handling areas. Applicants shall submit the study to the City prior to issuance of building permits. Additional conditions, such as landscape buffers, building orientation, and light shielding, may be applied during project-level design review to mitigate noise and visual impacts on adjacent residential properties.
- Prior to issuance of building permits for any future development resulting from this non-project action, the applicant shall submit a Design Review application to the City for administrative review and approval. The Design Review shall ensure coordinated development of access, stormwater management, landscaping, building orientation, and buffering measures to mitigate potential impacts to adjacent residential areas. The City may impose additional conditions at the Site Plan Review stage to address site-specific impacts.

Current Discussion:

City staff are currently reviewing the application and are requesting additional direction from the Planning Commission. The following are points that city staff would like to discuss:

1. City Proposed Alternative 2:

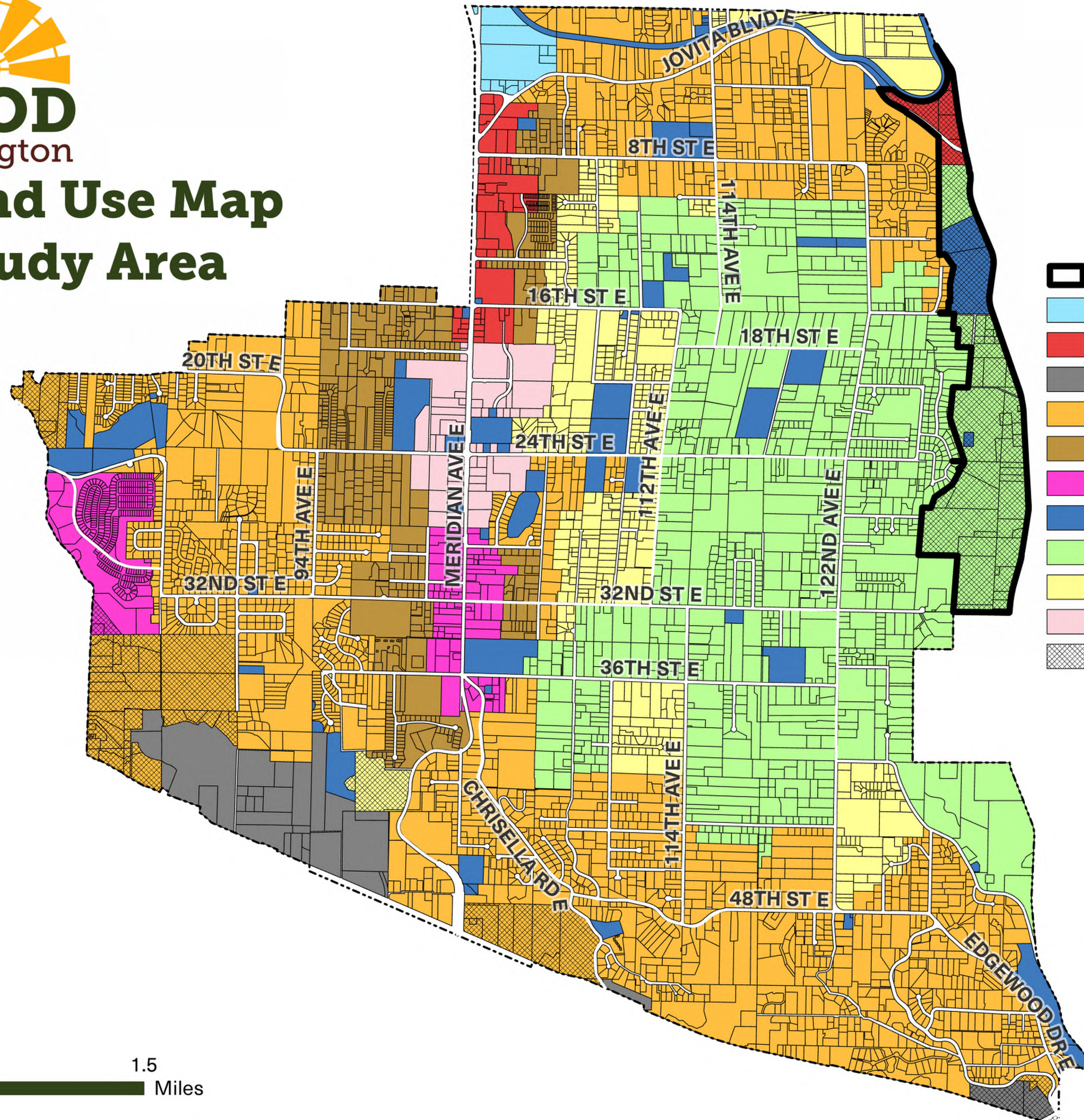
After reviewing the initial Comprehensive Plan Amendment and Rezone submittal documents, the West Valley Highway Overlay Land Use Study, notice of application comments, and previous comments from other agencies, City staff believe that an overlay restricting the types of industrial land use may resolve some of the public and agency concerns. As such, staff would like to offer an alternative to the applicant's proposal for consideration.

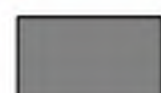
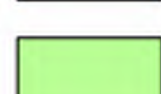
Staff Question: Does the Planning Commission have an initial concern regarding an Industrial Restriction Overlay? Should the city utilize the industrial land uses proposed by 25-002-COMP PLAN application (Schober application) as a starting point?

Staff Recommendation

The Planning Commission is invited to review the attached materials and provide feedback.

Current Land Use Map Showing Study Area

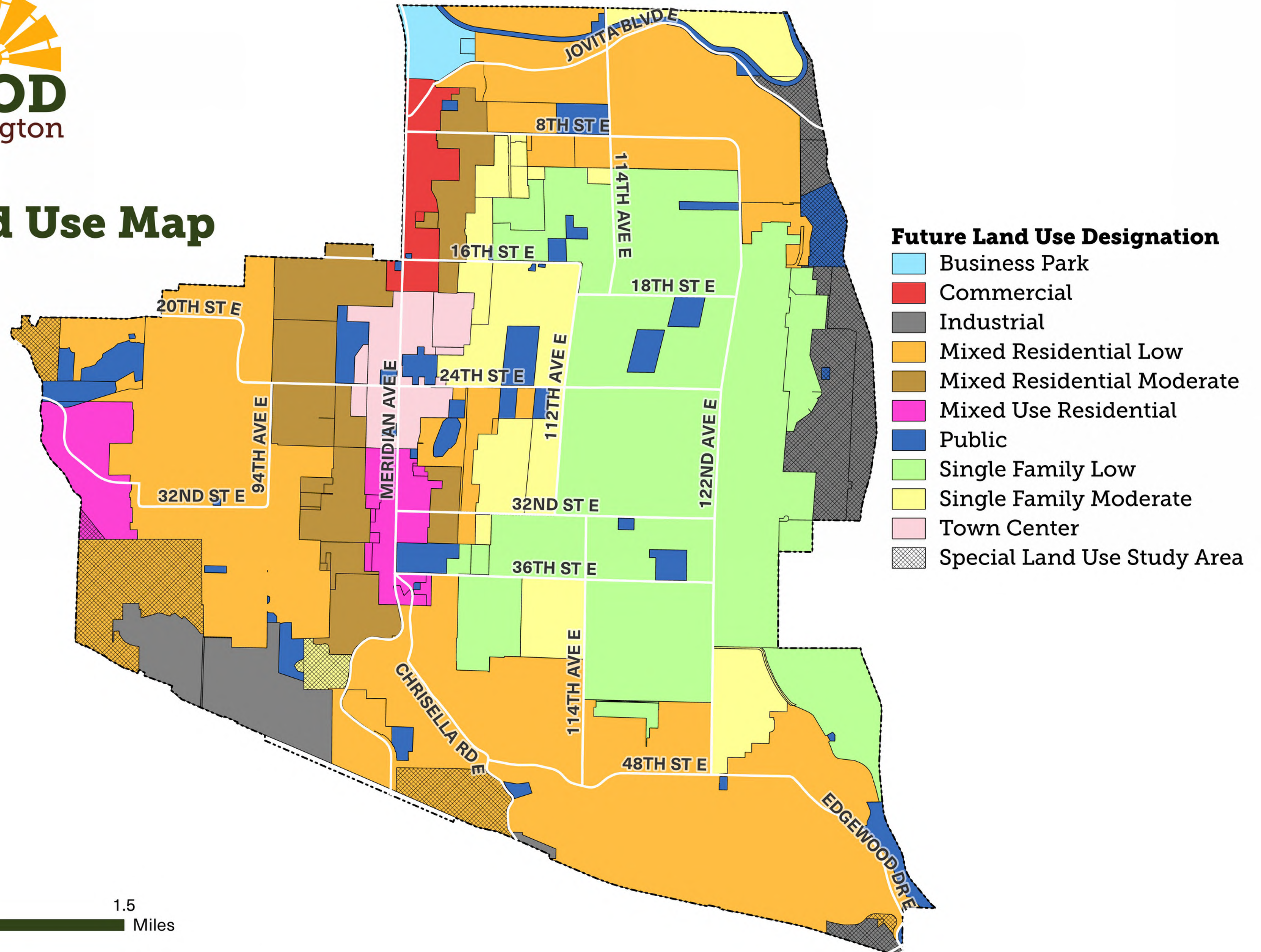


-  West Valley Study Area
-  Business Park (BP)
-  Commercial (C)
-  Industrial (I)
-  Mixed Residential 1 (MR-1)
-  Mixed Residential 2 (MR-2)
-  Mixed Use Residential (MUR)
-  Public (P)
-  Residential 1 (R-1)
-  Residential 2 (R-2)
-  Town Center (TC)
-  Special Land Use Study Area



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Proposed Future Land Use Map

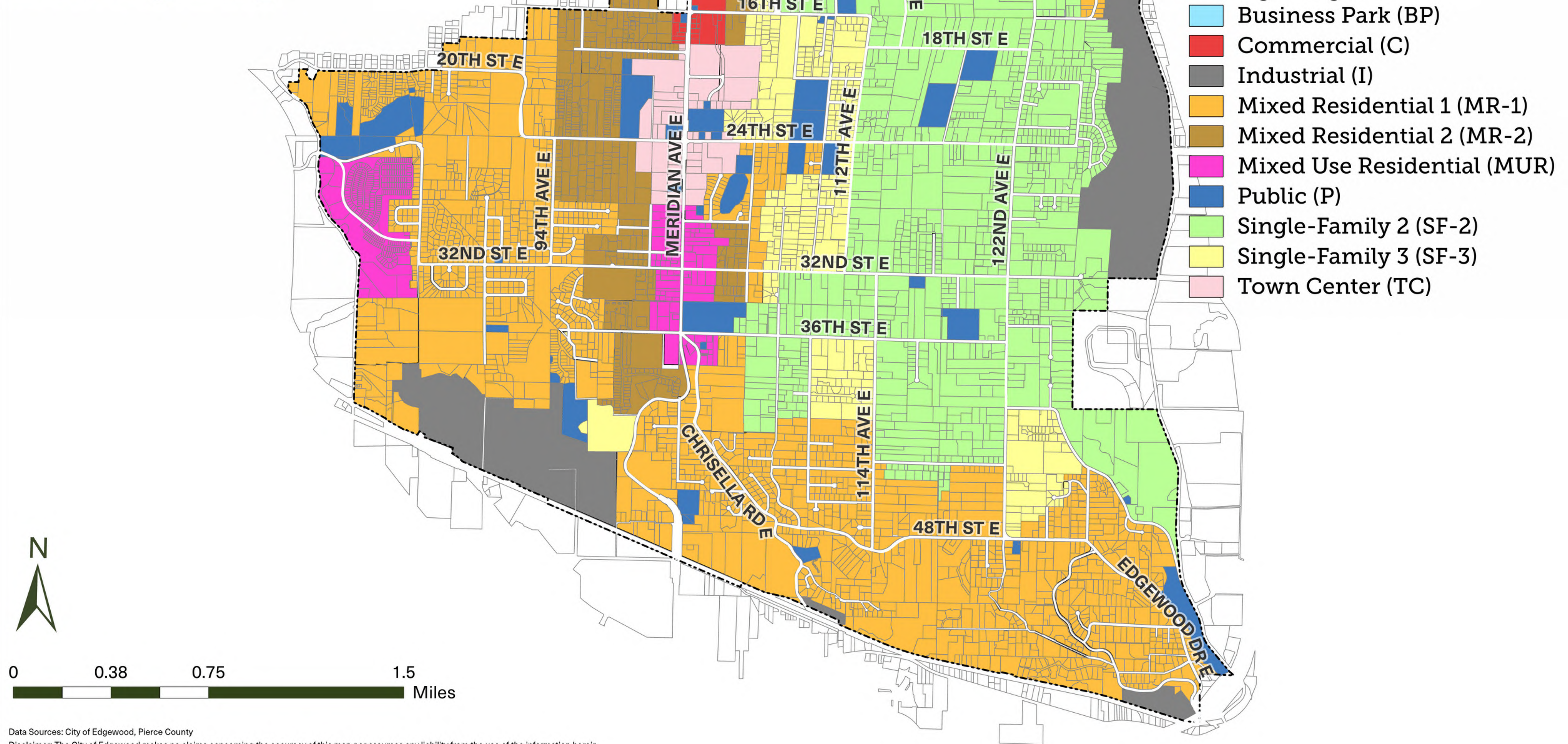


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Data Sources: City of Edgewood, Pierce County

Disclaimer: The City of Edgewood makes no claims concerning the accuracy of this map nor assumes any liability from the use of the information herein.

Proposed Zoning Map



West Valley Highway Final Land Use Study

Edgewood, Washington

Prepared For:

City of Edgewood

Prepared By:

SCJ Alliance

8730 Tallon Lane NE, Suite 200

Lacey, WA 98516

360.352.1465

September 2025



West Valley Highway Land Use Study

Project Information

Project: West Valley Highway Land Use Study

Prepared for: Jeremy Metzler, P.E., Community
Development Director

Josh Kubitza, AICP, Planning Manager

City of Edgewood
2224 104th Ave E.
Edgewood, WA 98372

Reviewing Agency

Jurisdiction: City of Edgewood

Project Representative

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Project Reference: SCJ #25-000102

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Appendix A: Permitted Use Table

1 Introduction

The City of Edgewood recently adopted its 2024 Comprehensive Plan, which identifies future study overlay areas targeted for evaluation of alternative land uses that may better align with terrain, location, and utility availability. One of these areas—the West Valley Highway Overlay Area—has been identified as a priority for review. To support this effort, the City has engaged SCJ Alliance to conduct a study that will inform whether changes to land use or zoning policy are warranted, consistent with the procedures outlined in the Edgewood Municipal Code (EMC).

Pursuant to EMC 18.60.220, any future Comprehensive Plan Amendment must demonstrate that proposed changes meet concurrency requirements for transportation and do not adversely impact the level of service for public facilities and services. Amendments must also avoid unmitigated significant adverse impacts to the City’s transportation network, capital facilities, utilities, parks, and environmental features, and must not place uncompensated burdens on existing or planned service capabilities.

1.1 Study Background

The geographical area this study covers is the West Valley Highway Overlay Area, also referred to as the ‘study area’ in this report. It is located in the northeast portion of the City of Edgewood along its border with the cities of Sumner and Pacific. Figure 1 shows the study area and its location within Edgewood.

have led to interest in possible redesignation of land uses (together with zoning and allowed uses) in the overlay areas.

- LU.1c Establish zoning overlays, where appropriate, to provide more specific regulation or standards in areas of special concern including, but not limited to, sub-areas or districts, special uses, or environmental protection.
- LU.1d Study the potential for new land use designations within the City on an as-needed basis, in response to changing community conditions or regulatory requirements. Consider the following as part of the study:
 - Potential for a master plan or small area plan
 - Potential for economic development, including recruitment of businesses that provide family-wage jobs and support for locally- owned businesses
 - Transportation access
 - Availability of public facilities and services
 - Environmental constraints
 - Compatibility with surrounding development
 - Community input
 - Property owner interests
 - Consistency with City plans and policies
 - Open space preservation, where appropriate
- LU.1.g Maintain communication with neighboring jurisdictions including Milton and regional partners to ensure coordination across boundaries.

2 Study Area Existing Conditions

2.1 Current Zoning and Land Uses

The following sections provide a detailed summary of the parcels within the study area, including current zoning designations, allowable uses, and key physical and regulatory characteristics.

2.1.1 Current Zoning

The West Valley Highway Overlay Area contains around 100 parcels. These parcels fall into three distinct zoning categories:

- ◆ **Commercial (C):** Located in the northern portion of the study area;
- ◆ **Public (P):** Two parcels situated centrally and one smaller parcel in the southern portion of the study area;
- ◆ **Residential 1 (R-1):** Covering the remaining portions of the study area.

Figure 2 below presents the City of Edgewood Zoning Map with the study area outlined in red. Figure 3 shows the Future Land Use designations in and around the study area.

Figure 2 West Valley Highway Overlay Area Zoning

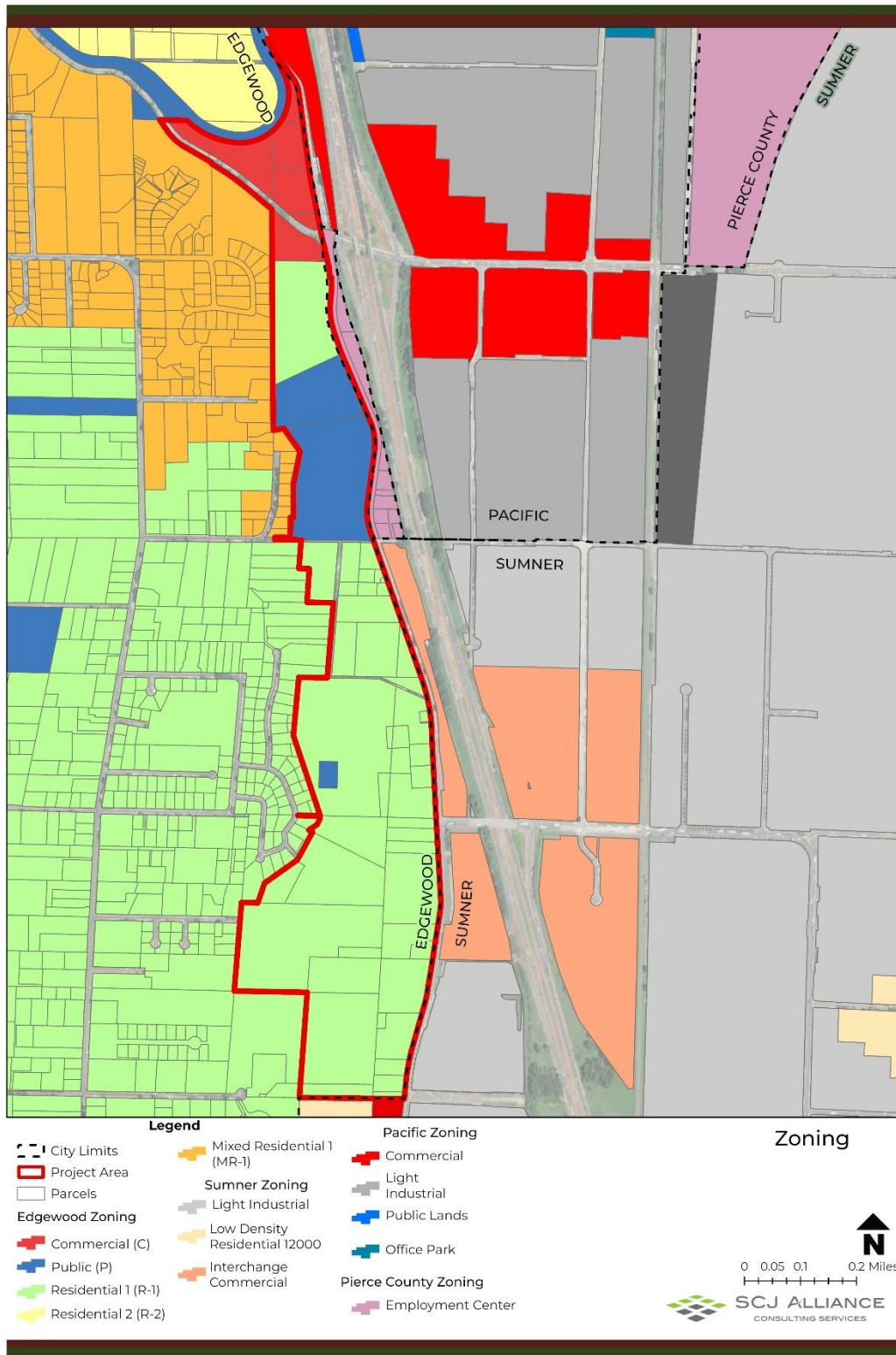
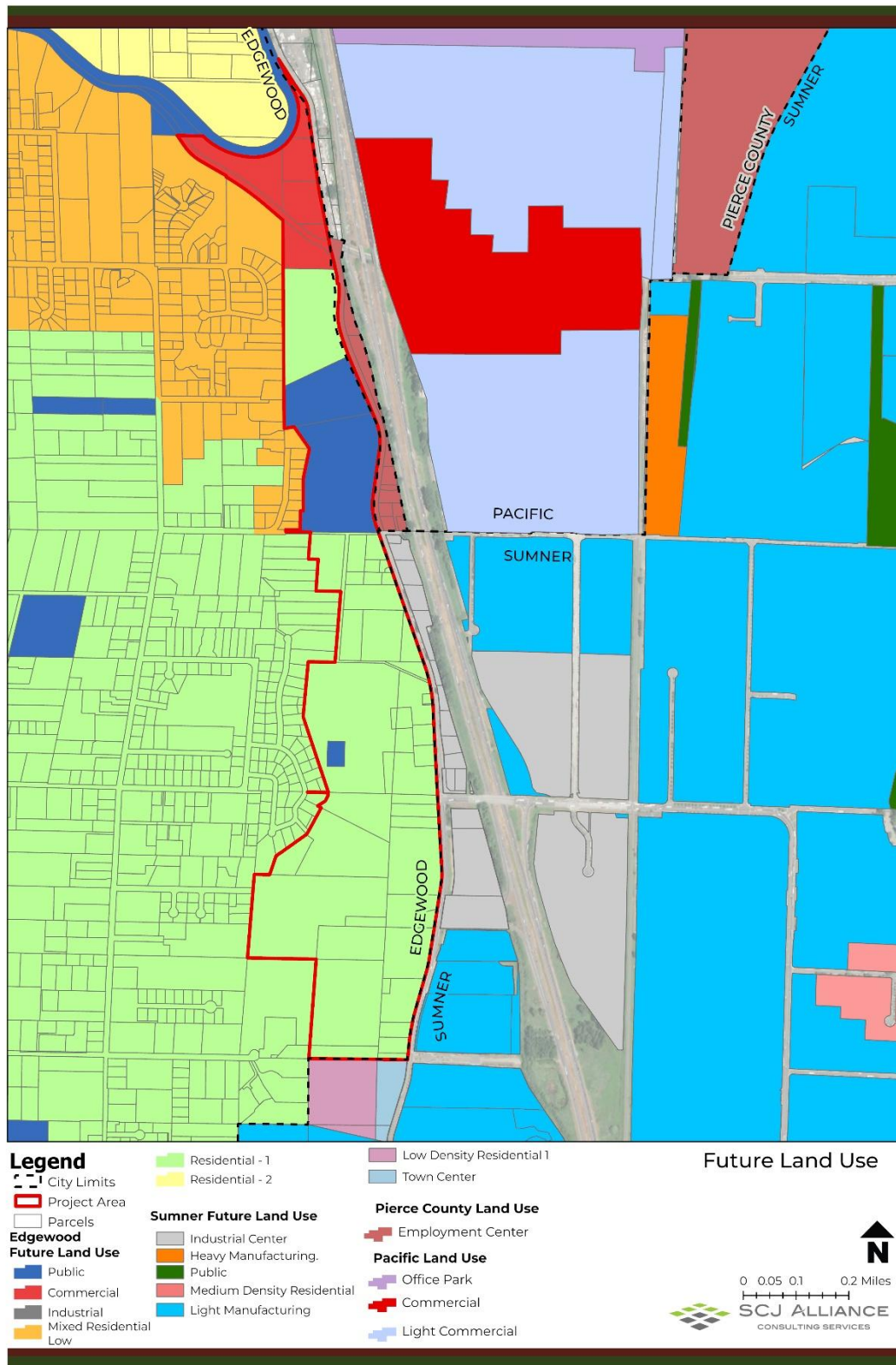


Figure 3 West Valley Highway Overlay Area Future Land Use Designations



2.1.2 Current Permitted Land Uses

The current zoning within the West Valley Highway Overlay Area establishes the framework for what types of development and use are permitted today. Each zoning category, Commercial (C), Public (P), and Residential 1 (R-1), includes its own set of permitted, conditional, and prohibited land uses, which are further shaped by the standards of the overlay zone.

Commercial

The City of Edgewood's *Commercial (C) zoning district*, as defined in EMC 18.80.080(B)(2), is intended for following purpose:

The Commercial (C) zoning district accommodates a wide range of commercial development, including large format retail, auto-oriented uses, and regional scale commercial uses. Development standards seek to balance the needs of the pedestrian with those of the automobile and are flexible to accommodate a wide range of uses and forms. This area provides a visual and functional transition to the Town Center and adjacent zones and assures that there is ample area to accommodate potential economic development opportunities. While commercial development is emphasized, this zone also allows multifamily housing with a mix of uses.

Appendix 1 shows the range of diverse uses permitted in the Commercial Zone including residential (such as ADUs, townhouses, apartments, live/work units, supportive housing, and emergency housing), educational (from elementary through trade schools), healthcare and social services, commercial (retail, consumer services, restaurants, bars, lodging, and veterinary services), and recreational and cultural uses.

Despite the breadth of permitted land uses, much of the subject area remains largely undeveloped. The landscape is characterized by forested parcels, steep slopes, and minimal urban infrastructure. A road construction company currently operates at the corner of Jovita Boulevard E and W Valley Highway E. Just northeast of this is a site formerly occupied by a small restaurant, now permanently closed. The land immediately north of the Commercial-zoned parcels, up the hill, is developed with large-lot single-family homes, presenting a lower-intensity residential character.

Public

The City of Edgewood's *Public (P) zoning district*, as defined in EMC 18.80.110, is intended for the following purpose:

The Public (P) zoning district provides for moderate-scale and large-scale activities relating to the purpose of state and local governmental entities and semi-public institutions providing necessary public services. The designation allows for the specialized needs of providing public services to all areas of Edgewood.

As detailed in Appendix 1, the Public zone allows for permitted uses including agricultural activities (such as crop production, animal husbandry, and agricultural sales), civic and cultural facilities (like libraries

and museums), indoor and outdoor arts and recreation, mobile vendors, restaurants and beverage establishments, administrative public facilities, parks and open space, and outdoor displays.

Currently, the northern portion of the Public zoned area consists of undeveloped parcels owned by the City of Edgewood. These lots remain vacant but represent an important opportunity for future public facility siting—whether administrative, recreational, or utility-based. The southern Public-zoned parcel, which is smaller in size, is a decommissioned well with the City of Sumner.

Residential 1 (R-1)

The City of Edgewood’s *Residential 1 (R-1) zoning district*, as defined in EMC 18.80.040, is intended for the following purpose:

The Residential Low (R-1) zoning district provides for a continuation of large residential lots in specific areas where a pattern of large lots and extensive tree coverage exists. These zoning districts seek to preserve the identity of these residential areas, preserve significant tree stands, and reduce traffic volumes in the east-west arterial corridors.

Recent middle housing code amendments have slightly expanded housing options in the R-1 zone while preserving its fundamental character. Under these amendments, the R-1 zone now permits:

- Up to two principal dwelling units per lot, such as a duplex or two detached homes, or
- One principal dwelling unit with up to two accessory dwelling units (ADUs).

Within the West Valley Highway Overlay area, the R-1 designation encompasses the majority of the study area. Existing land uses within this zone reflect a mixture of developed single-family residential properties and vacant parcels. The bulk of the developed residential lots are concentrated to the western side of the overlay area. The portion of the R-1 zone within the overlay area remains fragmented and less developed, containing large, wooded parcels and open space areas, but still contains single family residential units in areas such as off 27th St Ct E and 17th St Ct E. A select few parcels in this area are further designated as forest land under RCW 84.33. While opportunities exist for additional residential development or infill within the R-1 zone, the maximum development potential of these parcels is likely constrained by critical areas (e.g., wetlands, steep slopes, habitat corridors) and the availability of urban services, including sewer, water, and transportation access.

2.1.3 Neighbor City Zoning Designations:

The West Valley Highway Overlay Area borders the cities of Sumner and Pacific as well as a portion of Pierce County, making it important to review land use designations across jurisdictional boundaries. Examining these adjacent areas provides context for regional land use patterns, and highlights key similarities and differences in existing uses and future possible development of the area.

The existing land uses in the adjacent parcels located in the City of Pacific are zoned Commercial while the parcels adjacent and located in the City of Sumner are mainly Light Industrial and Interchange Commercial.

2.1.3.1 Pacific

The northeast portion of the study area lies a commercially zoned area of the City of Pacific. Existing uses along this highway include used car lots, truck dealerships, and a fuel station, which collectively give the corridor a distinct auto-oriented commercial identity.

Commercial

Purpose: The Commercial (C) district is intended for those uses which serve a larger public than the immediate neighborhood, including manufacturing, light industrial, retail and office uses. These uses are intended to have access to major arterials and to SR-167, and can generate traffic on adjacent streets. Parking requirements are generally greater than for neighborhood uses. Uses found in this district include a wide range of retail sales, service and light industrial establishments. They serve both long-term and short-term needs in locations typically appropriate to commercial clusters near intersections or along major thoroughfares.

2.1.3.2 Unincorporated Pierce County

To the east of study area's Public zoned parcels lies a narrow strip of unincorporated Pierce County. This section of land acts as a jurisdictional buffer between Edgewood and the City of Pacific. This transitional area is currently developed with auto- and equipment-oriented commercial uses, including RV sales, equipment sales, and waste management services. Pierce County has designated this area as Employment Center on its zoning map, indicating a focus on economic activity, business services, and light industrial operations; however, a large portion of this site is designated as a wetland and will see limited development.

Employment Center

Under Pierce County Code: **18A.10.080(A)**

Purpose: To designate adequate industrial areas to meet the needs of a growing jobs-based economy.

Description:

An Employment Center (EC) is a concentration of low- to high-intensity office parks, manufacturing, other industrial development, or a combination of activities. It may also include commercial development as a part of the center if the commercial development is incidental to the employment activities of the center and supports and serves the needs of the workforce.

2.1.3.3 Sumner

The remaining portions of the study area are bordered by the City of Sumner and its Light Industrial and Interchange Commercial zoning.

Light Industrial/Light Manufacturing

M-1, light manufacturing district purpose:

The M-1 district is intended to provide areas for light manufacturing, general industrial activities, warehousing and limited service commercial uses that are complementary and are not detrimental to either existing or proposed industrial uses, or neighboring commercial and residential districts. Typical uses in this district include assembling and manufacturing of products from previously prepared

material, and may include planned industrial parks which are designed to ensure compatibility between the industrial operations therein and the existing activities and character of the community in which the park is located.

Interchange Commercial

IC, Interchange Commercial District. The IC district is intended to provide for retailing and other commercial services that are easily accessible from the freeway, yet are not located near residential districts. Such commercial developments primarily rely on the automobile as their principal source of access.

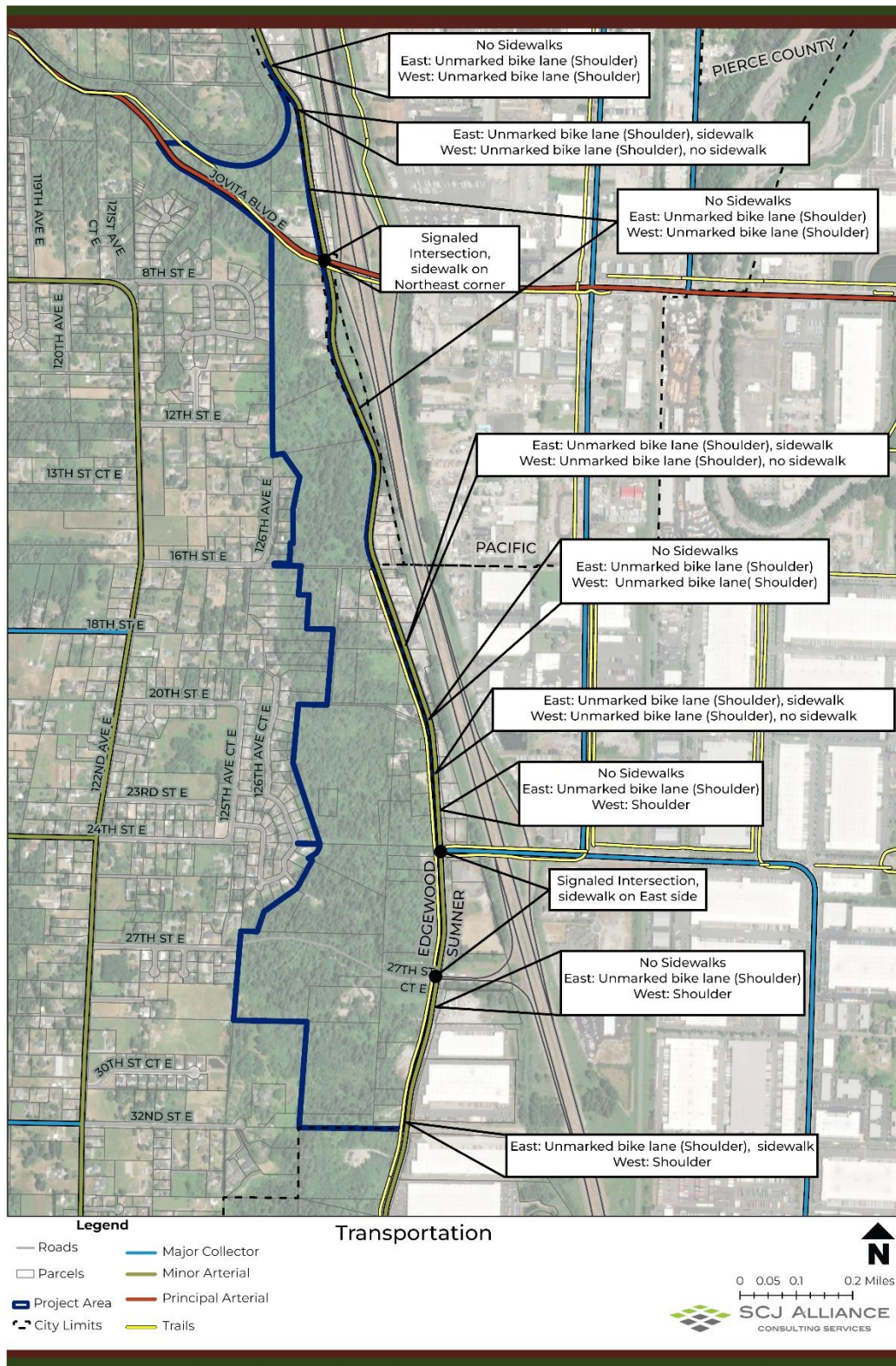
2.2 Summary of Existing Conditions

This section reviews key components of the existing transportation network, utility service availability, and critical areas within the study area, all of which play a crucial role in shaping land use feasibility and guiding future investment. By identifying existing deficiencies or limitations this analysis helps highlight the barriers to development and informs strategies for policy alignment, infrastructure improvement, and environmental protection within the West Valley Highway Overlay.

2.2.1 Transportation Network

Transportation access to the study area is primarily provided via West Valley Highway E, a regional north-south minor arterial that serves as the eastern edge of the Overlay. Jovita Boulevard E is a principal arterial connecting Edgewood to the City of Pacific and access onto State Route 167. There are a few local streets connecting to residential land uses such as 27th St Ct E or 17th St Ct E along the eastern side of the overlay area and 126th Ave Ct E along the western side of the overlay area. There are no internal local streets that connect W Valley Highway E to the top of the slope or areas within Edgewood to the west other than Jovita Boulevard E or south outside of the study area at Edgewood Dr E. While the arterial road network supports regional vehicle travel and goods movement, pedestrian and multimodal infrastructure is severely limited. Sidewalks, crossings, and transit amenities are largely not present, as seen in Figure 4 below, posing challenges to non-vehicular mobility and connectivity to nearby centers. In the neighboring City of Pacific, Jovita Blvd E transitions into Steward Rd SE where a portion of the interurban trail connects multimodal use from the City of Pacific up to the City of Tukwila. The City of Edgewood Comprehensive plan states that while their section of the Interurban Trail, parallel to Jovita Boulevard E, does not currently connect to the rest of the regional Interurban Trail system, there are plans to connect it.

Figure 4 Transportation Facilities



2.2.2 Utility Availability

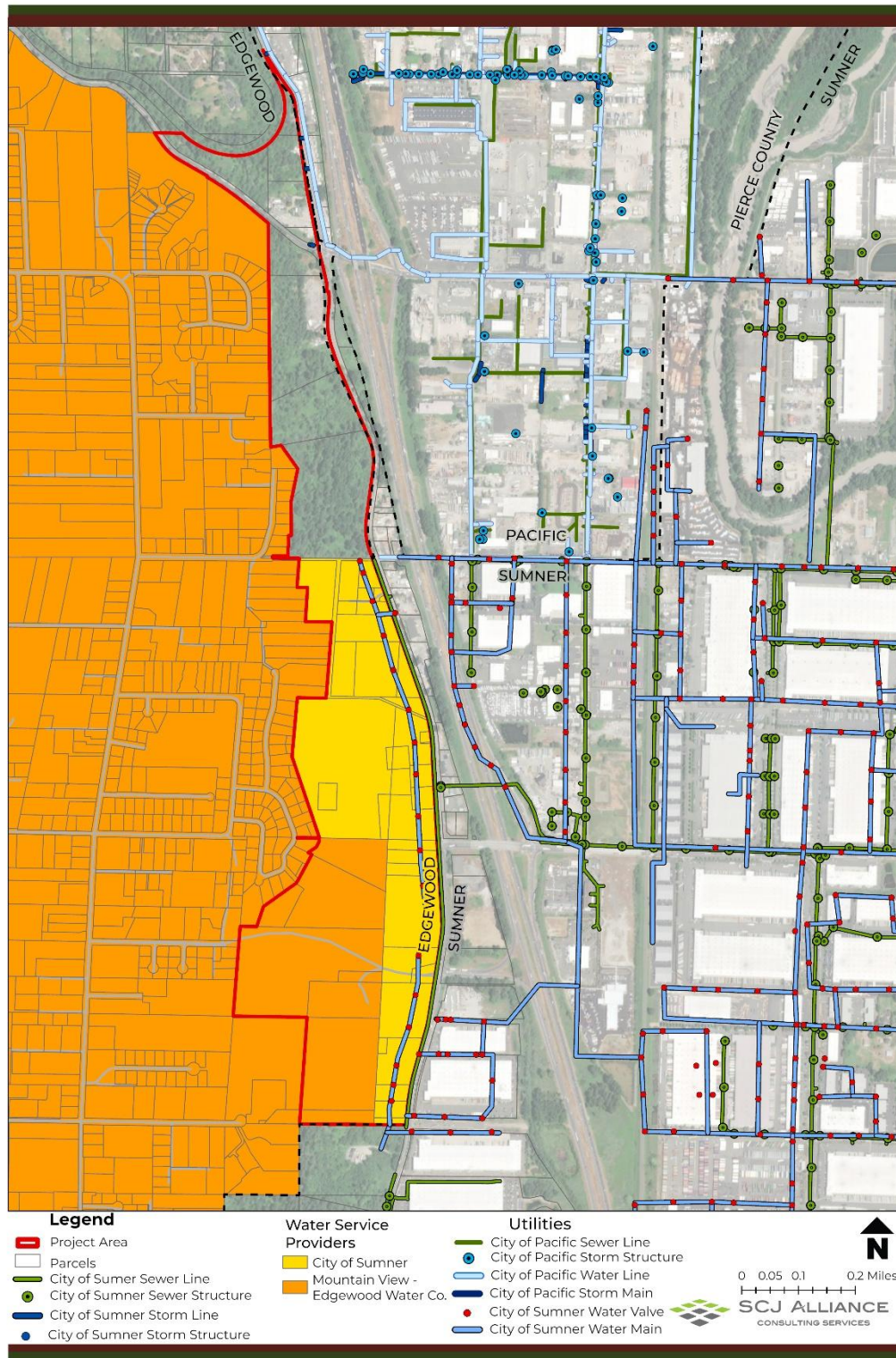
Utility infrastructure within the study area is partially developed, with inconsistent access to full urban services, particularly for undeveloped parcels. As shown in Figure 5, water and sewer service availability varies across the study area and is dependent on both parcel location and proximity to existing utility mains. In several locations, especially within larger lots or less developed zones, service connections may be limited or absent altogether.

Areas designated for higher-density development, such as those within the Mixed Residential 1 (MR-1) and Commercial zoning districts, may require infrastructure extensions or capacity upgrades to support their intended intensity of use. For instance, redevelopment or infill within the Commercial zone, currently characterized by minimal development and a mix of forested and industrial parcels, would likely necessitate substantial investment in water, sewer, and stormwater infrastructure, particularly if larger-scale commercial or mixed-use projects are pursued.

For the Residential 1 (R-1) zone, a full buildout under the current zoning allowances (i.e., two dwelling units per lot or one unit with two ADUs) would also create additional demands on utility services, especially in the more rural or forest-designated parcels. Notably, coordination with the City of Sumner would be required for several R-1 parcels in the southern portion of the study area, where utility provision crosses jurisdictional boundaries. Figure 5 highlights these parcels and their corresponding service providers.

Connecting to Sumner's water and sewer system would be beneficial. However, until a study is done and an agreement is in place, the utility demands that will be acceptable for the current system is unknown. It is recommended to continue working with the City of Sumner on an allowable flow rate for both water and sewer.

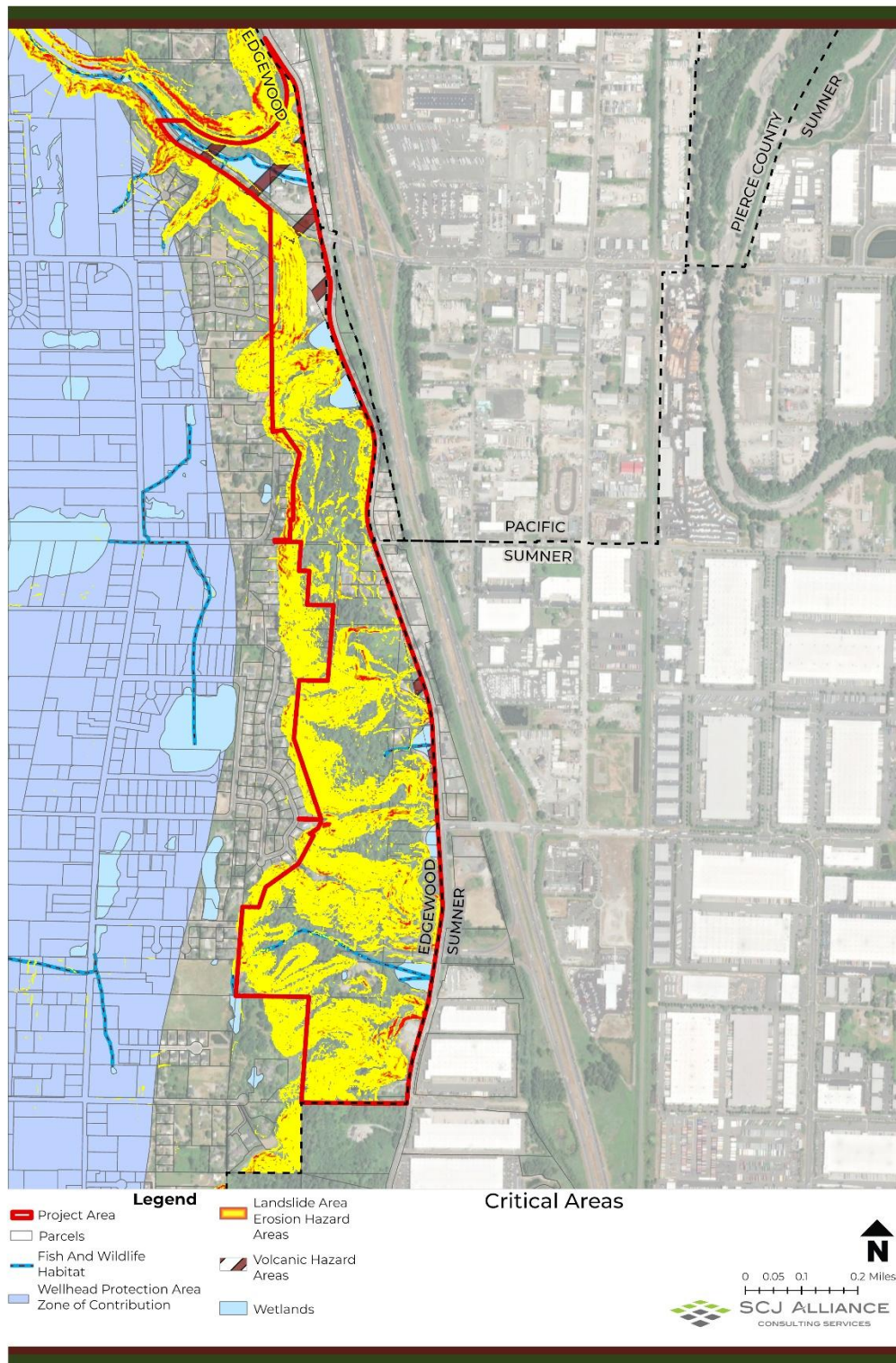
Figure 5 Utility Service Providers



2.2.3 Environmental Considerations

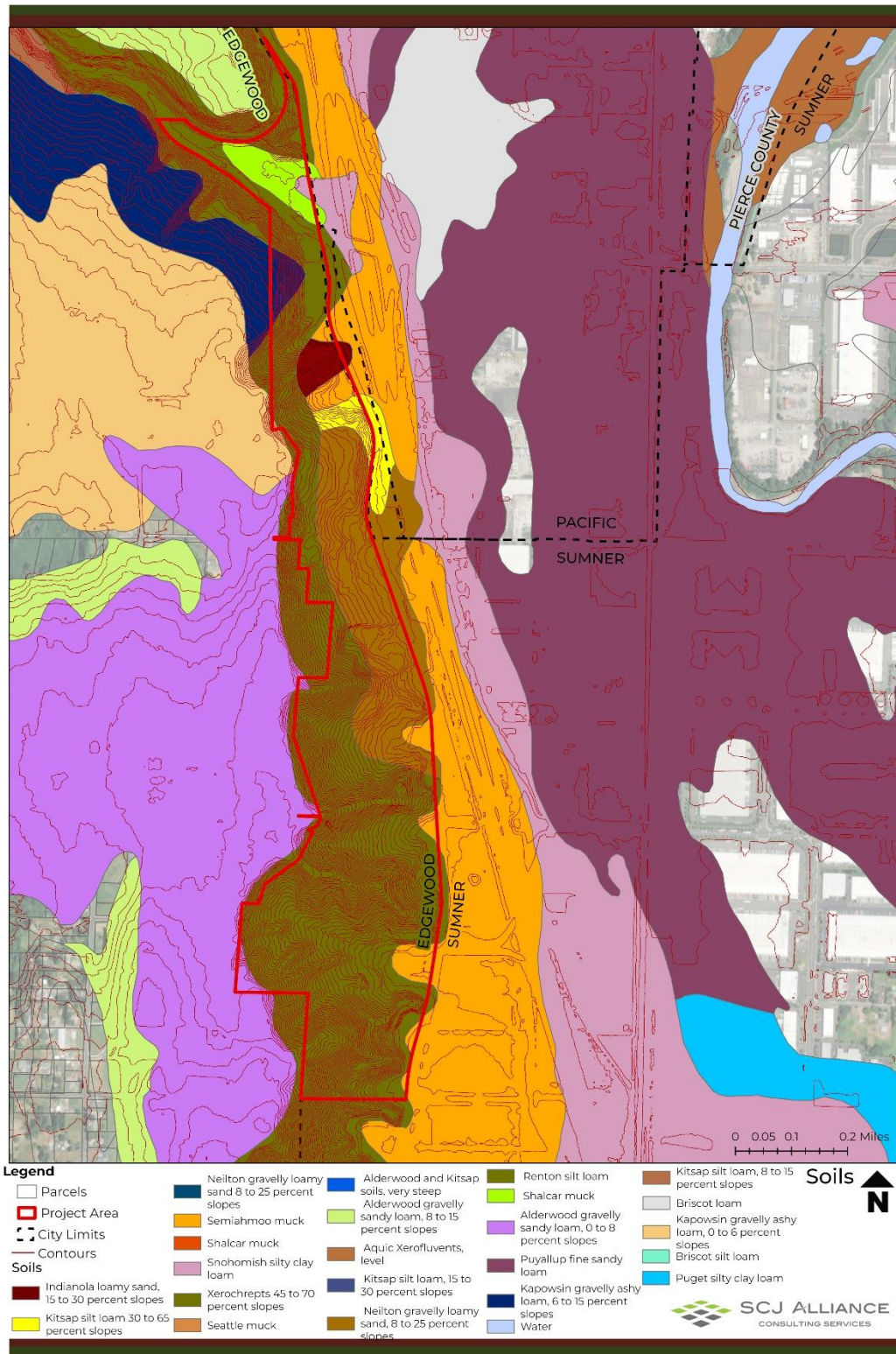
The presence of critical areas such as steep slopes, streams, and wetlands further influences the development feasibility within the study area. Figure 6 below shows that the topography of the West Valley Overlay area is quite steep with slopes as high as 65 to 70 percent in areas. There are also a few fish and wildlife habitat conservation areas as well as wetlands that would impact the feasibility of development.

Figure 6 Critical Areas Map



Additionally, the topographical contours in Figure 7 below indicate significant slopes throughout this region. In reviewing the areas most impacted by this, the R-1-zoned portions are where there is the heaviest prevalence of steep slopes. According to the USDA Web Soil Survey, results of which are also shown in Figure 7, most of the West Valley Overlay area is categorized by 47F. 47F is made up of Xerochrepts soil with slopes ranging from 45 to 70 percent slopes, such slopes would highly restrict development in this area.

Figure 7 Soil Types

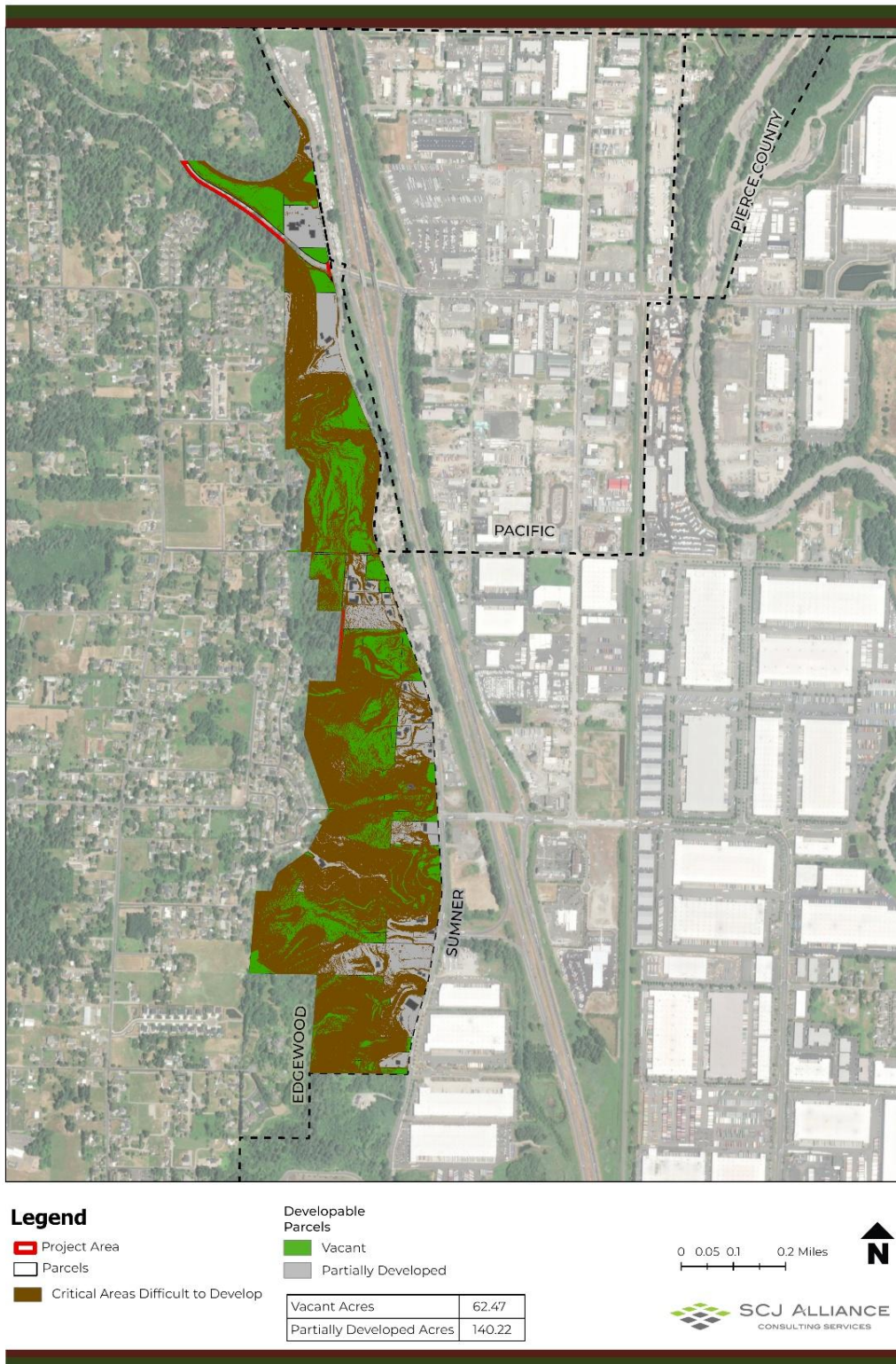


As a result, site-specific environmental constraints, including buffer requirements, stormwater management, and mitigation standards, will play a significant role in determining the feasibility of future development of this area.

2.2.4 Potential Development Limitations

As described above, development in the study area is constrained by steep slopes and critical areas. What can and cannot be developed will depend on specific development proposals. Figure 8 below shows information about development limitations and notes which parcels are already at least partially developed.

Figure 8 Development Limitations



3 Future Zoning Scenarios

The City of Edgewood is evaluating the West Valley Highway Overlay Area for alternative land uses that may better align with existing terrain, strategic location, and available utilities. This area was identified as a priority for review due to its development potential and proximity to key transportation corridors. The following scenarios explore the potential impacts and benefits of various zoning options, considering development feasibility, infrastructure capacity, and compatibility with surrounding land uses. These include:

- **Scenario 1a:** Rezone the West Valley Highway Overlay Area to Industrial
- **Scenario 1b:** Rezone the West Valley Highway Overlay Area to Business Park
- **Scenario 2:** Rezone the West Valley Highway Overlay Area to similar zoning as the adjacent jurisdictional zoning
- **Scenario 3:** No Action

The scenarios outlined above were developed in coordination with the City to evaluate potential rezones where alternative land use designations may better align with terrain and utility availability. Under all scenarios, the three parcels currently zoned for Public use retain that designation; all other parcels within the study area were evaluated according to the parameters of each scenario.

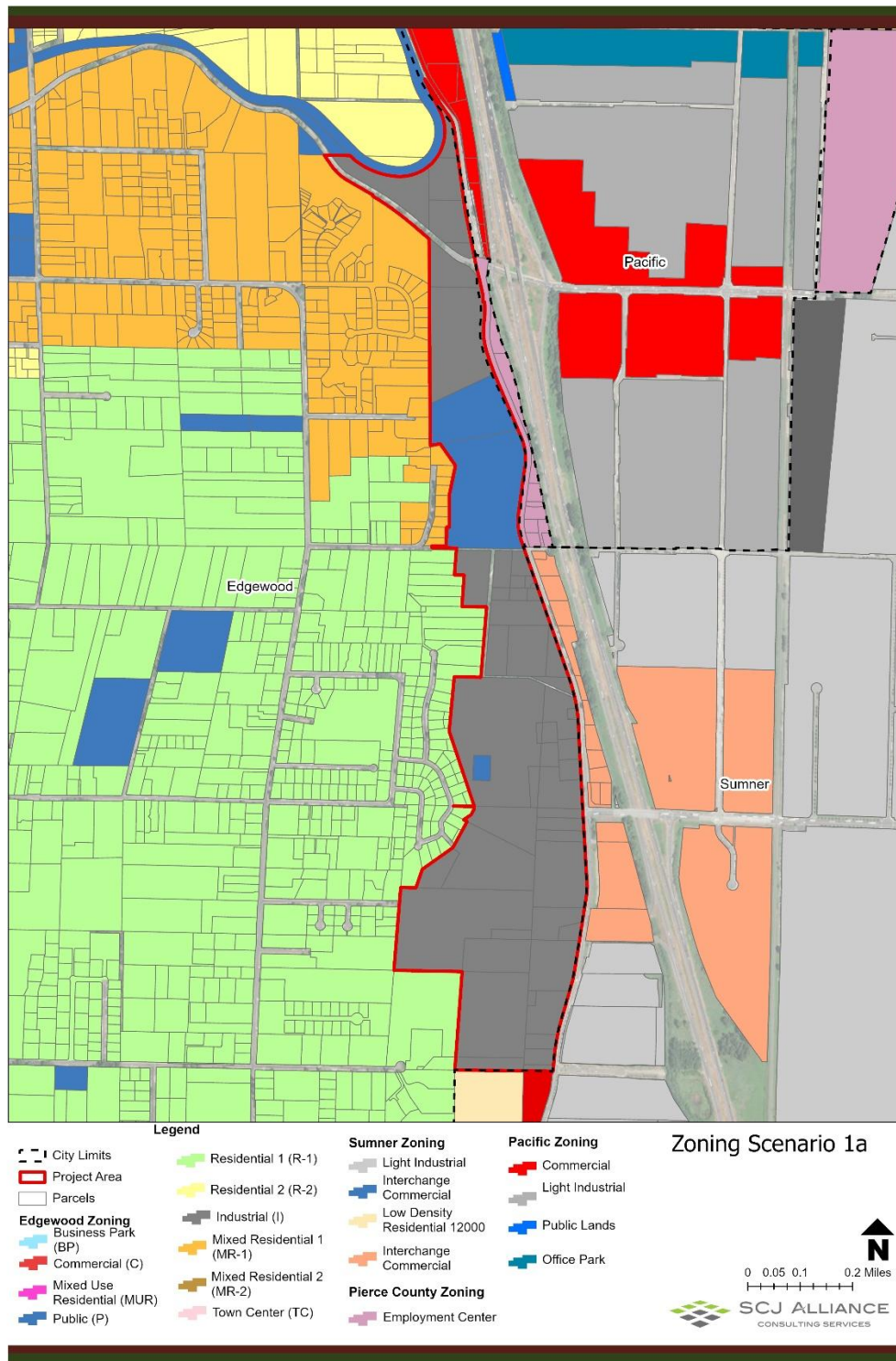
A complete list of permitted, conditional, and accessory uses for each zoning designation relevant to this study is available in Appendix A.

3.1 Scenario 1a: Rezone to Industrial

This scenario would rezone the study area to an Industrial designation, which supports a mix of production, distribution, repair, and service-oriented uses. The intent is to attract businesses that contribute to Edgewood's employment base while maintaining compatibility with surrounding land uses through appropriate siting, buffering, and development standards.

See Figure 9 below for zoning designations and boundaries under this scenario.

Figure 9 Scenario 1a: Rezone to Industrial



3.1.1 Zoning Categories and Allowed Uses

The Industrial (I) zoning designation permits a broad range of non-residential uses that are generally lower in intensity than heavy industry. The following groupings reflect the types of permitted uses allowed under this zoning, highlighting development potential based solely on the zoning designation (excluding other factors such as infrastructure, terrain, or parcel size).

Permitted uses include:

- **Agricultural and Production:** Agricultural sales, miscellaneous crop production, and animal production and aquaculture.
- **Manufacturing and Trade:** Craft manufacturing, light manufacturing, wholesale trade, solar electric power generation.
- **Storage and Warehousing:** Mini-warehouses, self-storage units, and other warehousing and storage operations.
- **Vehicle and Equipment Services:** Passenger and truck rental, automotive oil change/lube shops, car washes, other automotive and equipment repair services, gasoline stations, and alternative fuel dealers.
- **Retail and Commercial Services:** Pet supply stores, general retail, consumer goods rental, commercial and industrial equipment rental, mobile vendors, and personal care services.
- **Hospitality and Entertainment:** Wedding and special occasion venues, drinking establishments, full-service and limited-service restaurants, snack bars, and gambling industries.
- **Institutional and Community-Oriented:** Emergency housing and shelter, community care & walk-in clinics, religious institutions up to 10,000 sq. ft., administrative public facilities, funeral homes and services.
- **Recreation:** Zoos, aquariums, botanical gardens, golf courses, and country clubs.
- **Other:** Outside displays and drive-up windows.

Conditional Uses

The following uses may be permitted within the Industrial zone subject to the City's conditional use permit process, as defined in **EMC 18.50.040**. These uses typically require additional review due to their scale, potential external impacts, or specialized nature.

- **Intensive Agricultural, Manufacturing, and Utility Uses:** Cattle feedlots, electric power generation, potable water treatment, sewage collection/treatment, heavy manufacturing, wind electric power generation, fuel dealers and waste management and remediation services.
- **Institutional and Educational Uses:** Schools (K-12 and colleges), educational services (all other), hospitals, ambulatory health care, services for the elderly and persons with disabilities, vocational rehabilitation services, and social assistance facilities.
- **Other Services:** Crematoria, sexually oriented entertainment, and parking lots.

3.1.2 Analysis of Impacts

Transportation Network

Vehicle trips were generated for full build-out of each scenario considered. While full build-out is unlikely under any scenario given the topography of the study area, this approach was chosen because

1) it allows for an even comparison across scenarios and 2) it represents the maximum potential impact under each scenario.

Projected vehicle trip generation under Scenario 1a is lower than what would be expected with full buildout under existing zoning. At full buildout, this scenario is estimated to generate approximately 8,863 daily trips, representing a reduction of roughly 2,000 daily trips compared to what is possible with existing zoning. In addition, the peak PM trip generation would be 894 trips, which is lower than what is possible under existing zoning (1,157 trips). However, peak AM trip generation (also 894 trips) would be slightly higher than what is possible under existing zoning (781 trips).

Because the potential trip generation of a built-out study area under the scenario is lower than if zoning is not changed, this scenario is not anticipated to have adverse impacts on the transportation network.

Capital Facilities

Significant adverse impacts on police, fire protection, schools, and emergency medical services are not anticipated under this rezone scenario. Incremental increases in demand would occur for police, fire, and emergency medical services as development occurs; however, these impacts could likely be managed within the City's existing capital facility planning framework. Specific impacts associated with future development proposals, their uses, and any applicable mitigation fees, would be evaluated at the time of project review and permitting. Parcels zoned public, which could potentially be used for capital facilities in the future, would continue to be zoned public.

Utilities

As noted in Section 2.2, utility infrastructure within the study area is partially developed, with inconsistent access to full urban services, particularly for undeveloped parcels. Development in the study area could potentially connect to City of Sumner water and wastewater utilities. At the time of writing of this Report, the City of Edgewood is in discussion with Sumner about this possibility, but the capacity that Sumner could accommodate from the study area has not been determined.

While limited water service remains a consideration, many industrial uses are more compatible with and adaptable to these constraints, with feasibility often depending on property owner proposals at the time of application. Certain uses, such as zoos, aquariums, golf courses, country clubs, hotels and motels, car washes, aquaculture facilities, and restaurants, would continue to face development challenges without significant infrastructure investment. In contrast, lower-demand uses such as agricultural sales, self-storage, and mini-warehouses may be more readily accommodated.

Water use for industrial development can vary greatly by use, but 4,500 gallons per day per acre can be used as a rough average. Based on steep slopes and critical areas, a reasonable assumption of industrial buildout in the area would be 100 acres. If 100 acres of the study area were developed with industrial uses, that would require 0.45 million gallons per day (MGD) of capacity for water use.

An increase in water use from the study area could potentially cause a significant adverse impact if it exceeds the capacity of the City of Sumner's water system. However, this could be avoided by either 1) implementing a supplemental overlay that allows only those industrial uses that could be accommodated within the available capacity or 2) relying on Edgewood's requirement for utility availability and traffic review for any site-specific development.

An overlay district could tailor land use regulations to the service limitations of the West Valley Highway Overlay Area. A customized overlay could restrict high impact uses that would exceed available utility or transportation capacity, such as car washes, golf courses, or hospitals. It could also establish performance standards to mitigate environmental, traffic, and noise impacts on current residential developments along the West Valley Highway. Finally, an overlay could include phasing provisions to ensure that development occurs only as infrastructure capacity is available, consistent with concurrency requirements under EMC 18.60.220. The following uses allowed in the Industrial zone could potentially be excluded in the overlay based on the constraints discussed throughout this report:

- Miscellaneous crop production, animal production, and aquaculture
- Car washes
- Drinking establishments and full-service and limited-service restaurants
- Zoos, aquariums, botanical gardens, golf courses, and country clubs

However, an overlay would add additional complexity to land use review for proposed development, placing additional burden on both developers and City of Edgewood staff. Because Edgewood already requires utility availability and traffic review of any site-specific development, an overlay may not be necessary. Industrial uses that would cause a significant impact to utilities would not be allowed under these existing requirements.

Parks and Environmental Features

There are no parks within the study area. Industrial uses in the study area would not create any additional demand for existing parks, and they would not be located adjacent or near to parks. Public zoned parcels could be developed as parks in the future, and parcels currently zoned public would remain public under this scenario. Therefore, no adverse impacts on parks would be anticipated.

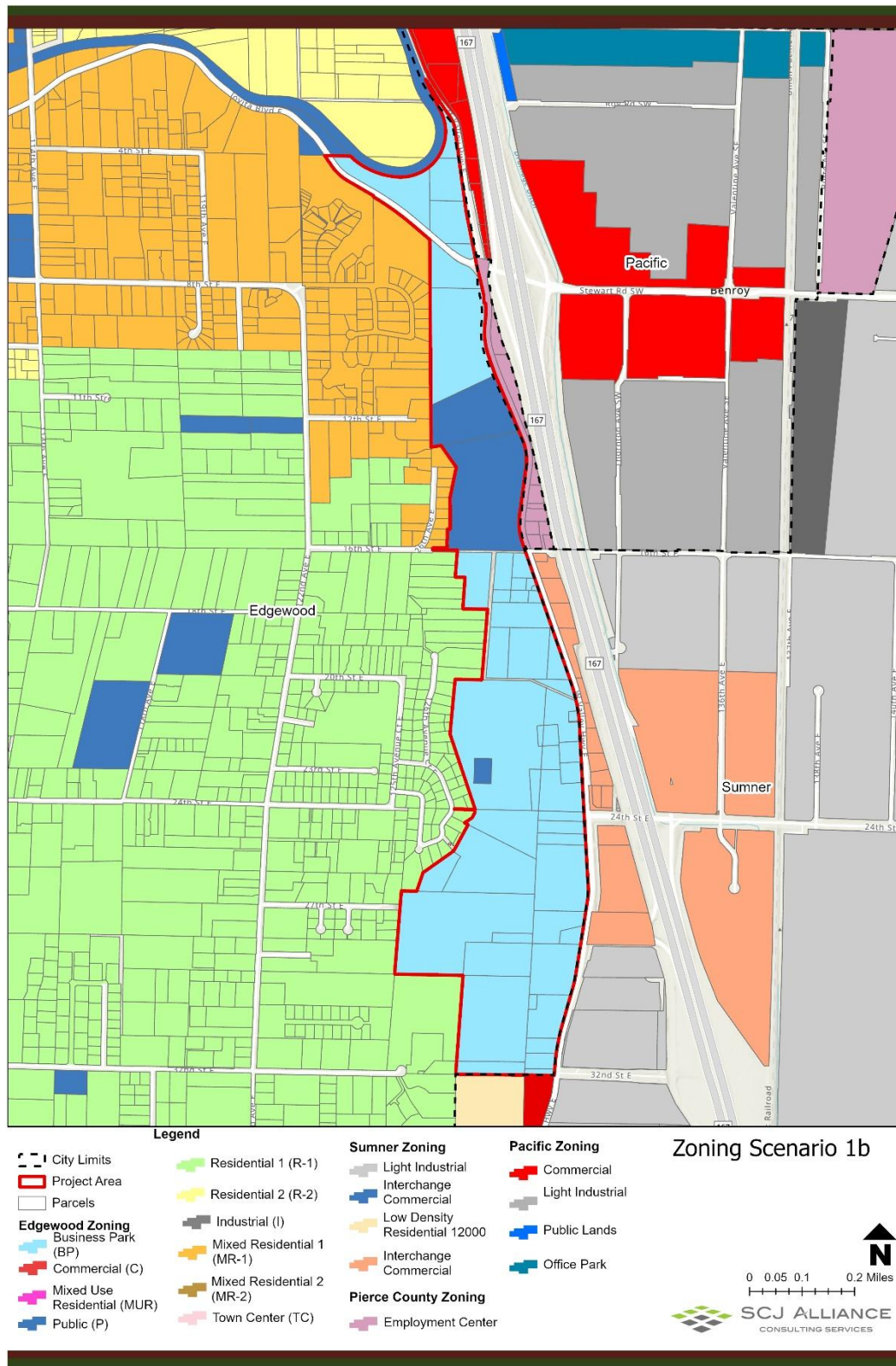
Environmental features in the study area include wetlands and fish and wildlife habitat conservation areas. Compared to currently allowed residential uses, industrial uses could have a greater impact on environmental features. However, environmental features would be protected by Edgewood's Critical Areas Ordinance (CAO), which restricts development in critical areas or their buffers. Some industrial uses could cause release emissions into the air or waste into water. However, local, state, and federal regulations would restrict remissions and waste, and individual development would be required to undergo site-specific State Environmental Policy Act (SEPA) review which would flag any issues and require identification of mitigation measures. If desired, Edgewood could create a supplemental overlay restricting specific utility uses in the area based on their potential to damage environmental features in the study area. Based on the CAO, SEPA, and other regulations, any adverse impacts to environmental features would not be significant and could be mitigated.

3.2 Scenario 1b: Rezone to Business Park

Scenario 1b is a variation on Scenario 1a which proposes rezoning the study area to a Business Park designation instead of Industrial. The Business Park zoning classification supports a range of institutional, commercial, and light industrial uses intended to promote employment opportunities and economic development while ensuring compatibility with adjacent land uses.

See Figure 10 below for zoning designations and boundaries under this scenario.

Figure 10 Scenario 1b: Rezone to Business Park



3.2.1 Zoning Categories and Allowed Uses

The Business Park zoning designation allows a broad mix of uses that promote job creation, access to services, and some supportive care options. The following groupings summarize permitted uses based solely on the zoning designation and do not account for site-specific development constraints such as infrastructure or topography. At the time of this Draft Report, Interim Zoning regulations under [Ordinance 25-0676](#) are in effect, prohibiting all new residential projects in the BP zoning district.

Permitted uses include:

- **Supportive Care Facilities:** Nursing and residential care facilities, assisted living facilities, permanent supportive housing, transitional housing, hospitals, community care & walk-in clinics, and social assistance services.
- **Institutional and Educational:** Schools (K-12, colleges, trade schools), libraries, and museums.
- **Commercial and Retail:** Agricultural sales, pet supply stores, gasoline stations, consumer goods rental, restaurants (full service, limited service, mobile vendors), personal care services, and car washes.
- **Recreation and Public Facilities:** Indoor entertainment, wedding and special event venues, golf and country clubs, parks, religious institutions, administrative public facilities, and outside displays.
- **Other:** Solar and wind electric power generation, craft manufacturing, alternative fueling stations, warehousing and storage up to 50,000 sq. ft.

Conditional Uses

The following uses may be permitted within the Business Park zone subject to the City's conditional use permit process, as defined in **EMC 18.50.040**. These uses generally require additional review to ensure compatibility with surrounding development.

- **Light Industrial:** Craft and light manufacturing, fuel dealers, outside storage, and waste management and remediation services.
- **Lodging and Services:** Hotels and motels.
- **Other:** Sexually oriented businesses, crematoria, and correctional institutions.

3.2.2 Analysis of Impacts

The Rezone to Business Park scenario is constrained by the limited availability of utilities in the study area and the potential for significant transportation impacts from increased trip generation.

Certain high-intensity land uses, such as schools, hospitals, nursing care facilities, car washes, and golf courses, would place significant demands on limited utility infrastructure and the transportation network. Without targeted infrastructure investments, these uses could negatively affect the level of service for both utilities and transportation systems. To mitigate such impacts, these uses would either require significant infrastructure upgrades or need to be restricted through an overlay or other regulatory tool applied to the study area in conjunction with this rezone.

Transportation Network

As noted above for Scenario 1a, vehicle trips were generated for full build-out of each scenario considered. Compared to industrial zoning (scenario 1a) or residential zoning (a large portion of the study area under existing zoning), the uses allowed in a business park zone generate a greater number of travel trips. At full buildout, this scenario is projected to generate approximately 32,717 daily trips, a substantial increase compared to the 11,975 daily trips possible under existing conditions. Projected trips under full buildout would also be substantially higher during peak AM and PM times than what is possible under existing conditions: an increase from 781 trips to 3,551 in the AM and from 1,157 trips to 3,209 in the PM. These increases would likely create adverse traffic impacts, though a more detailed technical assessment would be required to confirm the impact.

Capital Facilities

Under the rezone to Business Park scenario, there is a potential for minor adverse impacts on services including police, fire protection, and emergency medical services depending on the intensity of the use. For example, the supportive care facility uses listed, if developed in this area, would create more demand for emergency medical services; however, the extent of these impacts would be quantified with future development proposals, and any applicable mitigation fees, would be evaluated at the time of project review and permitting. Parcels zoned public, which could potentially be used for capital facilities in the future, would continue to be zoned public.

Utilities

As described for Scenario 1a, utility infrastructure within the study area is a constraint. Development in the study area could potentially connect to City of Sumner water and wastewater utilities, and certain uses could exceed existing capacity.

Water use for commercial development can vary greatly by use, but 3,000 gallons per day per acre can be used as a rough average. Based on steep slopes and critical areas, a reasonable assumption of commercial buildout in the area would be 100 acres. If 100 acres of the study area were developed with industrial uses, that would require 0.3 million gallons per day (MGD) of capacity for water use. This would be a lower amount of water use than would be required for Scenario 1a (if all industrial uses were allowed).

Parks and Environmental Features

There are no parks within the study area. Industrial uses in the study area would not create any additional demand for existing parks, and they would not be located adjacent or near to parks. Public zoned parcels could be developed as parks in the future, and parcels currently zoned public would remain public under this scenario. Therefore, no adverse impacts on parks would be anticipated.

Environmental features in the study area include wetlands and fish and wildlife habitat conservation areas. Compared to currently allowed residential uses, business uses could have a greater impact on environmental features. However, environmental features would be protected by Edgewood's Critical Areas Ordinance (CAO), which restricts development in critical areas or their buffers. Individual development would be required to undergo site-specific State Environmental Policy Act (SEPA) review which would flag any issues and require identification of mitigation measures. Based on the CAO, SEPA,

and other regulations, any adverse impacts to environmental features would not be significant and could be mitigated.

3.3 Scenario 2: Similar to Adjacent Zoning

This scenario considers aligning the zoning of the study area with that of adjacent jurisdictions, including Pierce County and the cities of Pacific and Sumner. Doing so would promote consistency along shared boundaries, coordinate regional land uses, and potentially support joint infrastructure or economic development initiatives. The goal is to increase compatibility with existing development patterns and improve long-term inter-jurisdictional planning outcomes.

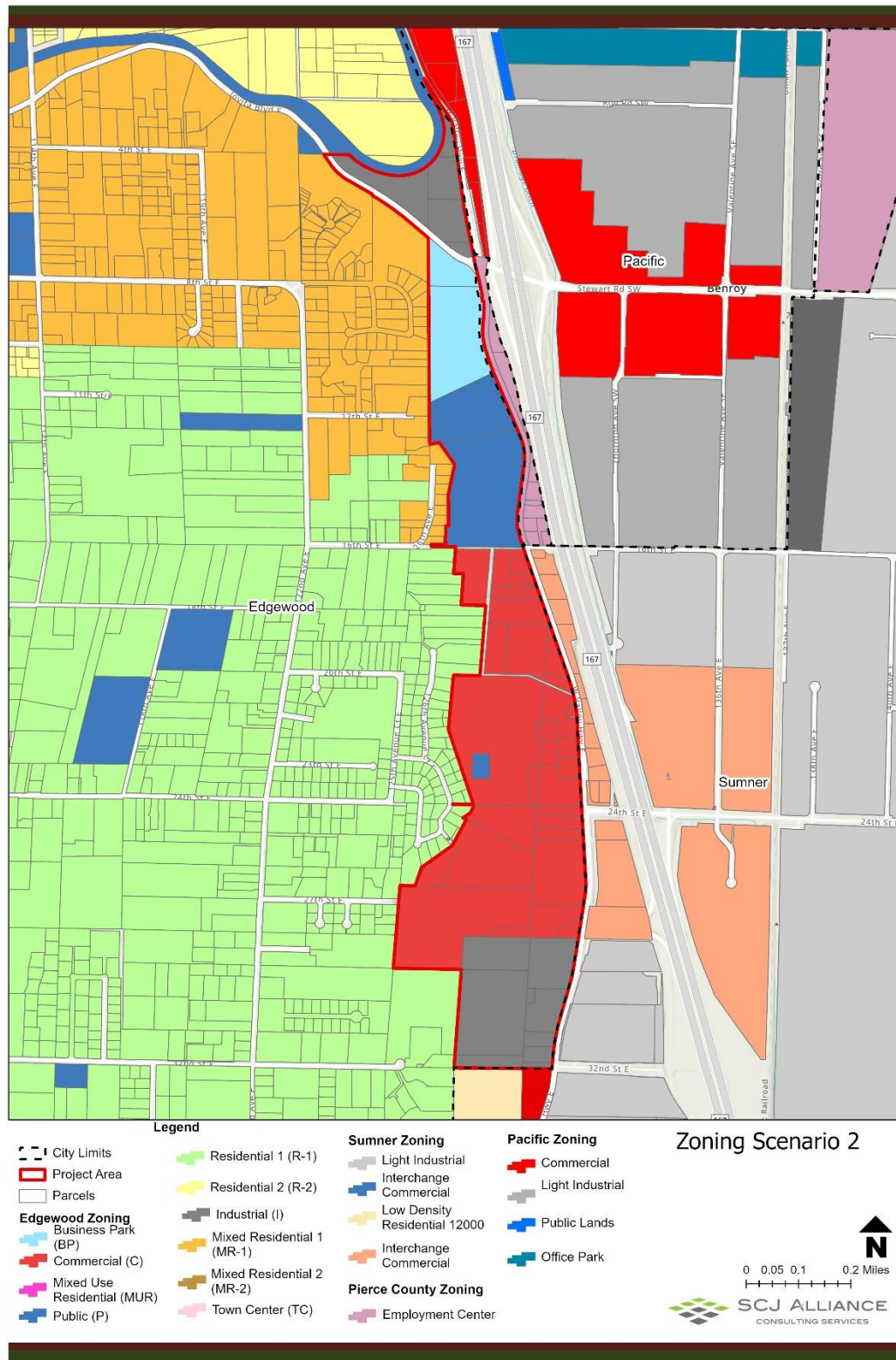
Zoning Application Summary

Under this scenario, zoning within the study area would be adjusted as follows:

- ◆ **Northern Commercial Area:** Rezoned to Industrial to better reflect current parcel uses and adjacent industrial/commercial development in the City of Pacific. While directly adjacent zoning in Pacific is Commercial, this scenario would rezone this area to industrial due to the following reasons:
 - 1) The adjacent Commercial zoning in Pacific is a small sliver of parcels;
 - 2) Pacific's Commercial zone allows for more light industrial uses than Edgewood's Commercial zone; and
 - 3) The City of Edgewood has noted that the current Commercial zoning in this area does not support desired uses.
- ◆ **Commercial and R-1 Parcels South of Jovita Blvd E:** Rezoned to Business Park, consistent with the nearby Employment Center zoning of Pierce County.
- ◆ **R-1 Parcels South of Public Parcels:** Rezoned to Commercial to complement Sumner's nearby commercial zoning.
- ◆ **Southern Residential Area:** Rezoned to Industrial to align with Sumner's Light Industrial zone.
- ◆ **Public Parcels:** Retain existing Public use designation.

See **Figure 11** below for zoning designations and boundaries under this scenario.

Figure 11 Scenario 2: Rezone to Adjacent Jurisdiction Zoning



3.3.1 Zoning Categories and Allowed Uses

Industrial (I) Zoning – EMC 18.80.100

Purpose: Provides for regional research, light manufacturing, warehousing, and other major regional employment uses. Industrial lands are limited to areas where regional transportation access is available.

Permitted Uses Include:

- *Agricultural & Production:* Agricultural sales, crop and animal production.
- *Manufacturing & Trade:* Light and craft manufacturing, wholesale trade, solar electric power generation.
- *Storage & Vehicle Services:* Warehousing, self-storage, auto repair, automotive oil change/lube shops, rentals, car washes, gasoline stations, and alternative fuel dealers.
- *Commercial & Retail:* Pet supplies, general retail, equipment rentals, mobile vendors, personal services.
- *Hospitality & Entertainment:* Wedding and special occasion venues, restaurants, bars, gambling industries.
- *Institutional:* Emergency housing/shelter, community care & walk-in clinics, religious institutions (<10,000 sq. ft.), public facilities, funeral homes and services.
- *Recreation & Other:* Zoos, golf courses, outside displays.

Business Park (BP) Zoning – EMC 18.80.080(4)

Purpose: To allow a wide range of employment and commercial uses, including offices, light industrial, and senior housing as a mixed use¹, with a focus on aesthetic appeal through development standards including an emphasis on significant landscaping.

Permitted Uses Include:

- *Supportive Care Facilities:* Nursing and residential care facilities, assisted living facilities, permanent supportive housing, transitional housing, hospitals, community care & walk-in clinics, and social assistance services.
- *Institutional & Educational:* Schools (K-12, colleges, trade schools), libraries, and museums.
- *Commercial:* Agricultural sales, pet supply stores, gasoline stations, consumer goods rental, restaurants (full service, limited service, mobile vendors), personal care services, and car washes.
- *Recreation & Civic:* Indoor entertainment, wedding and special event venues, golf and country clubs, parks, religious institutions, administrative public facilities, and outside displays.

¹ At the time of this Draft Report, Interim Zoning regulations under [Ordinance 25-0676](#) are in effect, prohibiting all new residential projects in the BP zoning district.

- *Other*: Solar and wind electric power generation, craft manufacturing, alternative fueling stations, warehousing and storage up to 50,000 sq. ft.

Commercial (C) Zoning – EMC 18.80.080(B)(2))

Purpose: To accommodate a wide range of commercial development, including large-scale and auto-oriented uses, while allowing mixed-use development that may combine commercial uses with multifamily housing. This zoning district includes development standards that seek to balance the needs of pedestrians with those of automobiles.

Permitted Uses Include:

- *Residential²*: Apartments, ADUs, townhomes, transitional/supportive housing, emergency housing, short term rentals, live/work.
- *Retail & Services*: Agricultural sales, pet stores, general retail, food services, restaurants, mobile vendors.
- *Hospitality & Vehicle Services*: Hotels, bed-and-breakfasts, wedding and event venues, vehicle rentals.
- *Institutional*: Schools, hospitals, walk-in clinics, daycares, vocational/social assistance.
- *Recreation & Civic*: Libraries, museums, golf courses, zoos, parks, religious institutions.
- *Other*: Wind electric power generation, craft manufacturing, alternative fueling, and drive up windows.

3.3.2 Analysis of Impacts

The Rezone to adjacent jurisdictional zoning scenario, while compatible with surrounding area, is limited by both utility constraints and varying levels of trip generation depending on use type. This scenario generates the highest daily trip generation of 34,076, largely due to the significant amount of area zoned Commercial and Business Park, both of which are tied to more trips generated than an industrial or residential scenario. This increase would likely create adverse traffic impacts, though a more detailed technical assessment would be required to confirm the impact.

Water infrastructure limitations remain a key consideration, particularly for the Commercial and Business Park components, which would require mitigation measures or infrastructure upgrades to maintain acceptable levels of service. High-demand uses (such as apartments, hotels and motels, and car washes) could place strain on both transportation and utility systems in these areas without such improvements. In contrast, the industrial component of the rezone is generally more compatible with existing utility capacity.

² At the time of this Draft Report, Interim Zoning regulations under [Ordinance 25-0676](#) are in effect, prohibiting single-use residential projects in the Commercial (C) zone.

Transportation Network

As noted above for Scenario 1a, vehicle trips were generated for full build-out of each scenario considered. This scenario generates the highest daily trip generation of 34,076, largely due to the significant amount of area zoned Commercial and Business Park, both of which are tied to more trips generated than an industrial or residential scenario. Projected trips under full buildout would also be higher during peak AM and PM times than what is possible under existing conditions: an increased from 781 trips to 1,409 in the AM and from 1,157 trips to 3,173 in the PM. These increases would likely create adverse traffic impacts, though a more detailed technical assessment would be required to confirm the impact.

Capital Facilities

Given the mixed use nature of the commercial zoning designation, this rezone scenario would have the highest potential for adverse impacts on capital facilities and public services—including police, fire protection, schools, and emergency medical services. Specific impacts associated with future development proposals, and any applicable mitigation fees, such as school impact fees under EMC Chapter 4.10, would be evaluated at the time of project review and permitting. Parcels zoned public, which could potentially be used for capital facilities in the future, would continue to be zoned public.

Utilities

As described for Scenario 1a, utility infrastructure within the study area is a constraint. Development in the study area could potentially connect to City of Sumner water and wastewater utilities, and certain uses could exceed existing capacity.

Under this scenario, both commercial and industrial development would be allowed. As noted above for Scenarios 1a and 1b, a reasonable estimate of water use for industrial development is 4,500 gallons per day per acre, and a reasonable estimate for commercial development is 3,000 gallons per day per acre. Based on steep slopes and critical areas, a reasonable assumption of commercial buildout in the area would be 100 acres. If 100 acres of the study area were developed with a mix of industrial and commercial uses, that would require 0.3 million to 0.45 million gallons per day (MGD) of capacity for water use. This would fall between the use for Scenario 1a and Scenario 1b.

Parks and Environmental Features

There are no parks within the study area. Industrial uses in the study area would not create any additional demand for existing parks, and they would not be located adjacent or near to parks. Public zoned parcels could be developed as parks in the future, and parcels currently zoned public would remain public under this scenario. Therefore, no adverse impacts on parks would be anticipated.

Environmental features in the study area include wetlands and fish and wildlife habitat conservation areas. Compared to currently allowed residential uses, business, commercial, and particularly industrial uses could have a greater impact on environmental features. However, environmental features would be protected by Edgewood's Critical Areas Ordinance (CAO), which restricts development in critical areas or their buffers. Some industrial uses could cause release emissions into the air or waste into water. However, local, state, and federal regulations would restrict remissions and waste, and individual development would be required to undergo site-specific State Environmental Policy Act (SEPA) review

which would flag any issues and require identification of mitigation measures. If desired, Edgewood could create a supplemental overlay restricting specific utility uses in the area based on their potential to damage environmental features in the study area. Based on the CAO, SEPA, and other regulations, any adverse impacts to environmental features would not be significant and could be mitigated.

3.4 Scenario 3: No Action

Under the No Action scenario, the City would retain the current zoning and land use designations for the area. This approach maintains the status quo and allows development to proceed under existing regulations.

3.4.1 Zoning Categories and Allowed Uses

Residential 1 (R-1) Zoning – EMC 18.80.040

Purpose: To provide for a continuation of large residential lots in specific areas where a pattern of large lots and extensive tree coverage exists. These zoning districts seek to preserve the identity of these residential areas, preserve significant tree stands, and reduce traffic volumes in the east-west arterial corridors.

Permitted Uses Include:

Recent middle housing code amendments have slightly expanded housing options in the R-1 zone while preserving its fundamental character. Under these amendments, the R-1 zone now permits:

- Up to two principal dwelling units per lot, such as a duplex or two detached homes, or
- One principal dwelling unit with up to two accessory dwelling units (ADUs).

Additionally uses such as religious institutions, wind and solar energy production, childcare, open space, transitional housing, and crop production are allowed in the R-1 zone.

Commercial (C) Zoning – EMC 18.80.080(B)(2))

Purpose: To accommodate a wide range of commercial development, including large-scale and auto-oriented uses, while allowing mixed-use development that may combine commercial uses with multifamily housing. This zoning district includes development standards that seek to balance the needs of pedestrians with those of automobiles.

Permitted Uses Include:

- *Residential*³: Apartments, ADUs, townhomes, transitional/supportive housing, emergency housing, short term rentals, live/work.
- *Retail & Services*: Agricultural sales, pet stores, general retail, food services, restaurants, mobile vendors.

³ At the time of this Draft Report, Interim Zoning regulations under [Ordinance 25-0676](#) are in effect, prohibiting single-use residential projects in the Commercial (C) zone.

- *Hospitality & Vehicle Services:* Hotels, bed-and-breakfasts, wedding and event venues, vehicle rentals.
- *Institutional:* Schools, hospitals, walk-in clinics, daycares, vocational/social assistance.
- *Recreation & Civic:* Libraries, museums, golf courses, zoos, parks, religious institutions.
- *Other:* Wind electric power generation, craft manufacturing, alternative fueling, and drive up windows.

Public (P) Zoning – EMC 18.80.110

Purpose: To provide moderate-scale and large-scale activities relating to the purpose of state and local governmental entities and semi-public institutions providing necessary public services. The designation allows for the specialized needs of providing public services to all areas of Edgewood.

Permitted Uses Include:

- *Agricultural:* Crop production, animal production, agricultural sales.
- *Civic & Cultural:* Libraries, museums.
- *Housing:* Emergency housing and shelters
- *Recreation & Arts:* Indoor and outdoor arts and recreation, parks and open space.
- *Retail & Services:* Mobile vendors, restaurants, beverage establishments.
- *Public Facilities:* Administrative public facilities, outdoor displays, solar electric power generation, and alternative fueling stations.

3.4.2 Analysis of Impacts

Under the No Change scenario, the study area would retain its current zoning and land use designations. Significant physical and infrastructure constraints (including steep topography, limited water service, and other development limitations) continue to support the appropriateness of the Residential-1 designation for much of the area, aligning with its capacity for low-intensity development. Under this scenario, slow or limited development in this area would likely continue. This is not only due to the physical constraints, but also to the related economic factors. For most Residential-1 zoned lots, the costs of permitting, potential mitigation measures, and construction in this study area may outweigh the potential return on investment. In such cases, the financial margins may be too slim for developers or property owners to justify navigating the development process.

By contrast, commercial uses at times can offer stronger and more sustained revenue potential, both during the initial sale and ongoing income generation, making them more attractive options to develop. However, the Commercial designation, as currently outlined in the Comprehensive Plan, may be less suitable given potential water access issues and the physical constraints that could limit buildout; compatibility would depend on the type and scale of commercial use proposed.

Existing land use patterns also present potential cross-jurisdictional incompatibilities. In the southern portion of the study area, Residential-1 parcels within the City of Edgewood abut Light Industrial parcels in the City of Sumner. While steep slopes provide some natural buffering, separation may not be sufficient where future Residential-1 development occurs on downhill slopes adjacent to heavier industrial uses. Similarly, Sumner's Interchange Commercial zoning specifies that commercial services

should not be located near residential districts; however, adjacent parcels across the jurisdictional boundary in Edgewood are zoned Residential-1. These conditions highlight the potential for conflicting land use expectations and impacts between jurisdictions.

Transportation Network

Under this scenario, zoning would not change and therefore the transportation network would not be impacted. Under full buildout, project traffic trips could reach 11,975 trips daily, including 781 in the AM peak hours and 1,157 in the PM peak hours. This is higher than what is projected under full buildout for Scenario 1a, but substantially lower than Scenario 1b and Scenario 2.

Capital Facilities

Significant adverse impacts on capital facilities and public services—including police, fire protection, schools, and emergency medical services—are not anticipated under the no action scenario. Specific impacts associated with future development proposals, and any applicable mitigation fees, would be evaluated at the time of project review and permitting.

Utilities

As describe for Scenario 1a, utility infrastructure within the study area is a constraint. Development in the study area could potentially connect to City of Sumner water and wastewater utilities, and certain uses could exceed existing capacity.

Water use for residential development can vary greatly, commonly ranging from 500 to 1,300 gallons per day per acre for low density residential development. Using an average within that range and the same assumption of acres that could be built out as for other scenarios (100 acres), that would require 0.09 million gallons per day (MGD) of capacity for water use. This would be a lower amount of water use than for any other scenarios. However, some parts of the study area currently have commercial zoning, so the actual water requirement with full buildout would likely be higher than this estimate. Compared to other scenarios, it is not possible to create an overlay that would restrict specific uses based on their water use.

Parks and Environmental Features

There are no parks within the study area. Public zoned parcels could be developed as parks in the future, and parcels currently zoned public would remain public under this scenario. Additional buildout of the area with residential development would increase the population of the area and therefore would increase demand for parks nearby the study area. If development occurred at levels that would require additional investment in parks (either for maintenance or to increase capacity by expanding existing parks or building new parks), impacts could be mitigated with Park Impact Fees under Edgewood Municipal Code (EMC) Chapter 4.20 (see below). However, the impact of residential development in the study area on demand for parks in Edgewood is likely to be low because 1) residential development is limited by steep slopes and critical areas, and 2) given the topography of the area, residents of the study area may visit parks in the cities of Sumner and Pacific. Therefore, no adverse impacts on parks would be anticipated.

Environmental features in the study area include wetlands and fish and wildlife habitat conservation areas. Compared to the business park and industrial uses allowed under other scenarios, residential uses

under this alternative could have less of an impact on environmental features. However, residential development would still involve clearing of vegetation and could potentially encroach on critical areas. Environmental features would be protected by Edgewood's Critical Areas Ordinance (CAO), which restricts development in critical areas or their buffers. Unlike other scenarios, individual residential would likely be SEPA-exempt and therefore would not undergo site-specific SEPA review which would flag any issues and require identification of mitigation measures. However, based on the CAO and other regulations, any adverse impacts to environmental features would not be significant and could be mitigated.

4 Recommendation

Following the analysis of the existing conditions, constraints, and potential future zoning scenarios for the West Valley Highway Overlay Area, SCJ Alliance recommends the City of Edgewood pursues a comprehensive **rezone of the West Valley Highway Overlay Area to Industrial**.

Industrial zoning is the most appropriate designation for this area for several reasons. From a transportation perspective, industrial development generates relatively few daily trips, and the area currently lacks active transportation facilities. Industrial uses primarily depend on vehicle and truck traffic, making freeway access critical. The study area's proximity to SR-167 provides convenient access for goods movement and strong regional employment connections. With the planned completion of the SR-167 expansion project, the area will also be well connected to I-5. In terms of infrastructure, many industrial uses are less water- and sewer-intensive than commercial, residential, or institutional uses, making them more compatible with current and anticipated utility capacity.

This zoning choice also aligns with surrounding jurisdictions, including the cities of Pacific and Sumner and Pierce County, which have designated this corridor for employment-based and light industrial uses. Such alignment reinforces a coordinated regional land use strategy, minimizes cross-boundary conflicts, and positions Edgewood to capture its share of employment growth. Industrial zoning further supports the City's economic development goals by attracting businesses that provide family-wage jobs while avoiding the service burdens of higher-intensity commercial or institutional uses. Additionally, many of the listed industrial uses are more adaptable to the environmental constraints that characterize much of the study area.

However, shifting the study area from Residential to Industrial introduces a challenging dynamic for existing residents. Rezoning to industrial creates a potential displacement pressure, particularly where existing residential properties are interspersed with parcels targeted for industrial uses. If not carefully managed, these residents could face increasing development pressure or compatibility conflicts over time. To address this, the City should engage directly with property owners and residents in the study area to discuss the proposed changes, identify potential strategies to minimize potential adverse impacts under the new zoning framework. The overlay may also include performance standards and buffering requirements to limit noise, traffic, and environmental impacts on existing residences, allowing for more compatible coexistence between current residential and future industrial uses.

As Section 3.2.1 describes, an increase in water use from the study area could potentially cause an adverse significant impact if it exceeds the capacity of the City of Sumner's water system. However, this

could be avoided by either 1) implementing a supplemental overlay that allows only those industrial uses that could be accommodated within the available capacity or 2) relying on Edgewood's requirement for utility availability and traffic review for any site-specific development. Because an overlay would add additional complexity to land use review for proposed development and Edgewood already requires utility availability and traffic review of any site-specific development, an overlay is not recommended. Industrial uses that would cause a significant adverse impact to utilities would not be allowed under these existing requirements.

Section 3.1.2 discusses the potential impacts of rezoning the study area to Industrial zoning on the transportation network, capital facilities, and environmental features and parks. As described in that section, there would not be significant adverse impacts that could not be mitigated.

In conclusion, rezoning the West Valley Highway Overlay Area to Industrial represents the most balanced approach for the City of Edgewood. This strategy aligns zoning with infrastructure realities, minimizes transportation and utility impacts, supports regional compatibility, and advances the City's economic development goals while preserving neighborhood and environmental compatibility.

Appendix A. Permitted Use Table

A detailed breakdown of the specific land uses permitted in each of these zones are provided in Table 1 below. This table has removed the uses that are not permitted in any of the following zones. This information helps establish the regulatory baseline for what uses are permitted to check against the highest intensity use of this study area.

Table 1: Edgewood Residential 1, Commercial, and Public Permitted Uses

Legend (EMC 18.70.040(A)) ✓ Permitted Use – Prohibited Use A Requires AUP CUP Requires CUP		Residential 1	Commercial	Business Park	Industrial	Public	
Land Use Category	NAICS Code	R-1	C	BP	I	P	Notes
Detached Dwelling	Special	✓	–	–	–	–	
Accessory Dwelling Unit (ADU)	Special	✓	✓	–	–	–	See EMC 18.90.190 for ADU requirements. ADUs are allowed secondarily in TC and C zones only when paired with a townhouse use.
Cottage Housing	Special	✓	–	–	–	–	
Courtyard Apartments	Special	✓	–	–	–	–	
Duplex	Special	✓	–	–	–	–	
Stacked Flats	Special	✓	–	–	–	–	
Townhouse	Special	–	✓	–	–	–	
Apartment	Special	–	✓	–	–	–	

Legend (EMC 18.70.040(A)) ✓ Permitted Use – Prohibited Use A Requires AUP CUP Requires CUP		Residential 1	Commercial	Business Park	Industrial	Public	Notes
Land Use Category	NAICS Code	R-1	C	BP	I	P	All Uses Subject to Conditions 1 and 6
Adult Family Home	623990, part	✓	–	–	–	–	In accordance with RCW 70.128.010(1), as amended
Nursing and Residential Care Facilities	6231; 6232	–	✓	✓	–	–	
Assisted Living Facilities	6233	–	✓	✓	–	–	
Live/Work Unit	Special	–	✓	–	–	–	
Work/Live Unit	Special	–	✓	–	–	–	
Permanent Supportive Housing		✓	✓	✓	–	–	
Transitional Housing		✓	✓	✓	–	–	
Agricultural Sales	Special	✓	✓	✓	✓	✓	
Crop Production	111, part	A	–	A	A	–	
Crop Production, All Other	111, part	✓	–	–	✓	✓	
Animal Production, Personal	112, part	✓	–	–	–	✓	Only permitted as an accessory use to a primary residential use.
Cattle Feedlots	112112	–	–	–	CUP	–	

Legend (EMC 18.70.040(A)) ✓ Permitted Use – Prohibited Use A Requires AUP CUP Requires CUP		Residential 1	Commercial	Business Park	Industrial	Public	Notes
Land Use Category	NAICS Code	R-1	C	BP	I	P	All Uses Subject to Conditions 1 and 6
Animal Production and Aquaculture, All Other	112 except 112210; 112112; 112511, part	✓	–	–	✓	CUP	
Electric Power Generation	22111	CUP	–	–	CUP	CUP	Not applicable to small- scale, independent residential units or single- building power supply units
Solar Electric Power Generation		✓	A	✓	✓	✓	
Wind Electric Power Generation		✓	✓	✓	A	A	
Potable Water Treatment	221310, part	CUP	–	–	CUP	CUP	
Sewage Collection or Treatment Facility	221320, part	CUP	–	–	CUP	CUP	
Manufacturing, Craft	Special	–	✓	✓	✓	–	
Manufacturing, Light	23, part; 311 except 3116; 312; 313;	–	–	A	✓	–	

Legend (EMC 18.70.040(A)) ✓ Permitted Use – Prohibited Use A Requires AUP CUP Requires CUP		Residential 1	Commercial	Business Park	Industrial	Public	Notes
Land Use Category	NAICS Code	R-1	C	BP	I	P	All Uses Subject to Conditions 1 and 6
	314; 315; 316; 337						
Manufacturing, Heavy	23, part; 321; 322; 323; 324; 325; 326; 327; 331; 332; 333; 334; 335; 336; 339	–	–	–	CUP	–	
Wholesale Trade	423; 424; 425	–	–	A	✓	–	
Automobile and Other Motor Vehicle Dealers	4411; 4412	–	CUP	A	A	–	
Gasoline Stations	447	–	CUP	✓	✓	–	Use is limited to 25,000 square feet of total site area per zone in the MUR and C zones (total site area includes all accessory and ancillary uses)
Alternative Fueling Stations	Special	-	✓	✓	✓	✓	
Pet and Pet Supplies Stores	453910	–	✓	✓	✓	–	

Legend (EMC 18.70.040(A)) ✓ Permitted Use – Prohibited Use A Requires AUP CUP Requires CUP		Residential 1	Commercial	Business Park	Industrial	Public	Notes
Land Use Category	NAICS Code	R-1	C	BP	I	P	All Uses Subject to Conditions 1 and 6
Fuel Dealers	454310	–	–	CUP	CUP	–	
Sexually Oriented Retail Businesses	Special	–	A	A	A	–	Subject to standards provided in EMC 18.100.100
Retail Trade, All Other	All Other 44; 45	–	✓	✓	✓	CUP	
Mini-Warehouses and Self-Storage Units	53113	–	–	✓	✓	–	
Warehousing and Storage, All Other up to 50,000 sq. ft.		–	–	✓	✓	–	
Warehousing and Storage, All Other 50,001 sq. ft. and greater		–	–	–	✓	–	
General – Business and Professional Services	All Office Use, plus: 51 except 517; 52; 531; 533; 54 except 541940; 55; 561; 813	–	✓	✓	A	–	

Legend (EMC 18.70.040(A)) ✓ Permitted Use – Prohibited Use A Requires AUP CUP Requires CUP		Residential 1	Commercial	Business Park	Industrial	Public	Notes
Land Use Category	NAICS Code	R-1	C	BP	I	P	All Uses Subject to Conditions 1 and 6
Wedding and Special Occasion Venues and Events	Special	A	✓	A	A	A	
Passenger Car Rental and Leasing	53211	–	A	✓	✓	–	
Truck, Utility Trailer, and RV Rental and Leasing	53212	–	A	✓	✓	–	
Consumer Goods Rental	5322; 5323, part	–	✓	✓	✓	–	
Commercial and Industrial Equipment Rentals	5323, part; 5324	–	–	✓	✓	–	
Waste Management and Remediation Services, All Other	5622, part; 5629	–	–	CUP	CUP	CUP	
Elementary and Secondary Schools	6111	CUP	✓	✓	CUP	A	
Junior Colleges, Colleges, Universities, and Professional Schools	6112; 6113; 6114	–	✓	✓	CUP	A	

Legend (EMC 18.70.040(A)) ✓ Permitted Use – Prohibited Use A Requires AUP CUP Requires CUP		Residential 1	Commercial	Business Park	Industrial	Public	Notes
Land Use Category	NAICS Code	R-1	C	BP	I	P	All Uses Subject to Conditions 1 and 6
Technical and Trade Schools	6115	–	✓	✓	A	A	
Educational Services, All Other	6116; 6117	–	✓	✓	CUP	A	
Ambulatory Health Care Services, All Other	All Other 621	–	✓	✓	CUP	CUP	
Hospitals	622	–	✓	✓	CUP	–	
Community Care & Walk-in Clinics	Special	-	✓	✓	✓	✓	
Services for the Elderly and Persons with Disabilities	624120	–	✓	✓	CUP	✓	
Vocational Rehabilitation Services	624310	–	✓	✓	CUP	✓	
Child Daycare Services, Home- Based	624410, part	✓	✓	-	–	–	Subject to standards provided in EMC 18.100.040 and requires an applicable Home Business Permit.
Child Daycare Services, All Other	624410, part	–	✓	✓	A	✓	Subject to standards provided in EMC 18.100.040

Legend (EMC 18.70.040(A)) ✓ Permitted Use – Prohibited Use A Requires AUP CUP Requires CUP		Residential 1	Commercial	Business Park	Industrial	Public	Notes
Land Use Category	NAICS Code	R-1	C	BP	I	P	All Uses Subject to Conditions 1 and 6
Social Assistance, All Other	All Other 624	–	✓	✓	CUP	CUP	
Emergency Housing		–	✓	A	✓	✓	
Emergency Shelter		–	✓	A	✓	✓	
Libraries	Special	–	✓	✓	A	✓	
Museums and Art Galleries	712 except 712130	–	✓	✓	A	✓	
Zoos, Aquariums, and Botanical Gardens	712130	–	✓	✓	✓	A	
Golf Courses and Country Clubs	713910	A	✓	✓	✓	A	
Sexually Oriented Entertainment	Special	–	–	CUP	CUP	–	Subject to standards provided in EMC 18.100.100
Gambling Industries	7132	–	A	A	✓	–	
Indoor Arts, Entertainment, and Recreation Activities, Other	Special	–	✓	✓	A	✓	
Outdoor Arts, Entertainment, and	Special	A	A	A	–	✓	

Legend (EMC 18.70.040(A))		Residential 1	Commercial	Business Park	Industrial	Public	Notes
✓	Permitted Use						
–	Prohibited Use						
A	Requires AUP						
CUP	Requires CUP						
Land Use Category	NAICS Code	R-1	C	BP	I	P	All Uses Subject to Conditions 1 and 6
Recreation Activities, Other							
Hotels (except Casino Hotels) and Motels	721110	–	✓	CUP	–	–	
Bed-and-Breakfast Inns	721191	A	✓	A	–	–	
Short-term Rentals	Special	A	✓	–	–	–	
RV Parks and Recreational Camps	7212	A	–	–	A	–	
Special Food Services	7223 except 722330	–	✓	✓	✓	✓	Allowed as incidental use in residential districts
Mobile Vendors	722330	A	✓	✓	✓	✓	In R-1, R-2, and MR-1, only permitted within 600 feet of a street corner and fronting on a Collector or Arterial road.
Drinking Places for Alcoholic Beverages	722410	A	✓	✓	✓	✓	Subject to regulation and classification by the Washington State Liquor and Cannabis Board. In R- 1, R-2, and MR-1, only permitted within 600 feet of a street corner and fronting

Legend (EMC 18.70.040(A))		Residential 1	Commercial	Business Park	Industrial	Public	Notes
✓	Permitted Use						
–	Prohibited Use						
A	Requires AUP						
CUP	Requires CUP						
Land Use Category	NAICS Code	R-1	C	BP	I	P	All Uses Subject to Conditions 1 and 6
							on a Collector or Arterial road.
Restaurants, Full Service	722511	A	✓	✓	✓	✓	In R-1, R-2, and MR-1, only permitted within 600 feet of a street corner and fronting on a Collector or Arterial road.
Restaurants, Limited Service	722513; 722514	A	✓	✓	✓	✓	Subject to compliance with drive-up windows (special) use, if also applicable. In R- 1, R-2, and MR-1, only permitted within 600 feet of a street corner and fronting on a Collector or Arterial road.
Snack and Nonalcoholic Beverage Bars	722515	A	✓	✓	✓	✓	Subject to compliance with drive-up windows (special) use, if also applicable. In R- 1, R-2, and MR-1, only permitted within 600 feet of a street corner and fronting on a Collector or Arterial road.
Personal Care Services	8121; 812310; 8123200	A	✓	✓	✓	–	In R-1, R-2, and MR-1, only permitted within 600 feet of a street corner and

Legend (EMC 18.70.040(A))		Residential 1	Commercial	Business Park	Industrial	Public	Notes
✓	Permitted Use						
–	Prohibited Use						
A	Requires AUP						
CUP	Requires CUP						
Land Use Category	NAICS Code	R-1	C	BP	I	P	All Uses Subject to Conditions 1 and 6
							fronting on a Collector or Arterial road.
Automotive Oil Change and Lubrication Shops	811191	–	A	A	✓	–	
Car Washes	811192	–	✓	✓	✓	–	
Automotive Repair and Maintenance, All Other	All Other 8111	–	A	A	✓	–	
Other Repair and Maintenance, Consumer	811 except 8111	–	A	A	✓	–	
Other Repair and Maintenance, Commercial/Industrial	811 except 8111	–	–	A	✓	–	
Funeral Homes and Funeral Services	812210	A	A	A	✓	–	In R-1, R-2, and MR-1, only permitted within 600 feet of a street corner and fronting on a Collector or Arterial road.
Crematoria	812220, part	–	–	CUP	CUP	–	
Kennels	Special	–	A	A	A	CUP	

Legend (EMC 18.70.040(A)) ✓ Permitted Use – Prohibited Use A Requires AUP CUP Requires CUP		Residential 1	Commercial	Business Park	Industrial	Public	Notes
Land Use Category	NAICS Code	R-1	C	BP	I	P	All Uses Subject to Conditions 1 and 6
Veterinary Services	541940	A	✓	✓	A	A	Only permitted in residential zones and MR-1 as an accessory use to a primary residential use.
Pet Care Services, All Other	812910, part	A	✓	✓	A	–	Only permitted in residential zones and MR-1 as an accessory use to a primary residential use.
Cemeteries	812220, part	A	–	–	–	CUP	
Religious Institution Up to 10,000 sq. ft.	813110, Assembly Only	✓	✓	✓	✓	✓	
Religious Institution 10,000 to 19,999 sq. ft.	813110, Assembly Only	✓	✓	✓	–	CUP	
Religious Institution 20,000 to 29,999 sq. ft.	813110, Assembly Only	A	✓	✓	–	CUP	
Religious Institution 30,000 to 39,999 sq. ft.	813110, Assembly Only	CUP	✓	✓	–	CUP	

Legend (EMC 18.70.040(A)) ✓ Permitted Use – Prohibited Use A Requires AUP CUP Requires CUP		Residential 1	Commercial	Business Park	Industrial	Public	Notes
Land Use Category	NAICS Code	R-1	C	BP	I	P	All Uses Subject to Conditions 1 and 6
Religious Institution 40,000 sq. ft. or greater	813110, Assembly Only	–	CUP	✓	–	CUP	
Correctional Institutions	922140	–	CUP	CUP	–	CUP	
Administrative Public Facility	92 except 922140	–	✓	✓	✓	✓	
Nonadministrative Public Facility	Special	–	–	–	–	A	Activities with Outside Storage also subject to EMC 18.90.120
Parks, Open Space, and Public Recreation	Special	✓	✓	✓	A	✓	
Parking Lots	812930, part	–	A	–	CUP	CUP	
Parking Structures	812930, part	–	A	–	A	A	
Drive-Up Windows	Special	–	✓	A	✓	-	Window shall not face a public ROW and facility must be screened from ROW
Outside Displays	Special	–	✓	✓	✓	✓	Activities also subject to EMC 18.95.030(I)

Legend (EMC 18.70.040(A)) ✓ Permitted Use – Prohibited Use A Requires AUP CUP Requires CUP		Residential 1	Commercial	Business Park	Industrial	Public	Notes
Land Use Category	NAICS Code	R-1	C	BP	I	P	All Uses Subject to Conditions 1 and 6
Outside Storage	Special	–	–	CUP	A	See Note	Allowed as incidental use in Public district. Activities also subject to EMC 18.90.120

25-001-COMP PLAN Impacted Parcels List:

TaxParcelNumber	Site_Address
0420118002	2410 TO 2412 WEST VALLEY HWY E
0420021020	622 WEST VALLEY HWY E
0420021064	XXX JOVITA BLVD E
0420022035	XXX JOVITA BLVD E
0420024021	XXX WEST VALLEY HWY E
0420024054	XXX WEST VALLEY HWY E
0420111028	XXX WEST VALLEY HWY E
0420114047	XXX 27TH STREET CT E
0420114065	XXX Undetermined Situs
0420115004	2102 WEST VALLEY HWY E
4495400962	XXX WEST VALLEY HWY E
4495400970	XXX 128TH AVE E
0420111025	2306 WEST VALLEY HWY E
0420114041	XXX 27TH STREET CT E
0420114017	XXX WEST VALLEY HWY E
4495400952	XXX 17TH STREET CT E
4495400932	1618 WEST VALLEY HWY E
0420021022	12620 JOVITA BLVD E
0420111026	XXX WEST VALLEY HWY E
0420118001 & 0420118002	2404 WEST VALLEY HWY E
0420021009	320 WEST VALLEY HWY E
0420021004, 0420021020, 0420021064 & 0420022035	XXX WEST VALLEY HWY E
0420111027 0420111028	2112 WEST VALLEY HWY E
0420114046 & 0420114047	XXX WEST VALLEY HWY E
0420114063 & 0420114065	2429 126TH AVENUE CT E
0420115003 & 0420115004	2102 WEST VALLEY HWY E
0420024003	830 WEST VALLEY HWY E
0420111007	2108 WEST VALLEY HWY E
0420114004	2720 WEST VALLEY HWY E
0420114014	3120 WEST VALLEY HWY E
0420118003	2420 WEST VALLEY HWY E
0420118008	XXX 27TH ST E
4495400931	12809 17TH STREET CT E
4495400941	1712 WEST VALLEY HWY E
4495400947	12808 17TH STREET CT E
4495400948	12818 17TH STREET CT E
4495400950	1812 WEST VALLEY HWY E
4495400980	2004 WEST VALLEY HWY E
4495400961, 4495400962 & 4495400970	1818 WEST VALLEY HWY E
0420114034	XXX 126TH AVENUE CT E

0420111002 & 0420111025
0420114040 & 0420114041
4495400949
0420114007 & 0420114017
0420114010
0420114001
0420114035
0420114077
4495400951 & 4495400952
0420111003
0420114022
0420115001
4495400891

2210 WEST VALLEY HWY E
12816 27TH STREET CT E
XXX 17TH STREET CT E
2906 WEST VALLEY HWY E
3120 WEST VALLEY HWY E
XXX WEST VALLEY HWY E
3004 WEST VALLEY HWY E
XXX WEST VALLEY HWY E
12819 17TH STREET CT E
2204 WEST VALLEY HWY E
2706 WEST VALLEY HWY E
XXX 126TH AVENUE CT E
XXX 128TH AVE E

Josh Kubitza

From: Cindy Casey <cindykc@hotmail.com>
Sent: Sunday, April 5, 2026 7:25 PM
To: comdev
Subject: Comment Letter – File 25-001-COMP PLAN - Opposition to Proposed Comprehensive Plan Amendment and Industrial Re Designation Along West Valley Highway

***This message is from an External Sender**

Dear Planning Commissioners and City Staff,

I am writing as a resident who lives directly above the subject properties included in the proposed amendment to re-designate the West Valley Highway corridor from Residential to Industrial. I appreciate the City's efforts to evaluate long-term land-use needs; however, I must respectfully oppose this amendment due to the significant and lasting impacts it would have on adjacent residential neighborhoods, including my own.

1. Impacts to Residential Property Values

My home directly overlooks the parcels proposed for Industrial designation. Industrial zoning introduces uses that are fundamentally incompatible with established residential areas, including:

- Increased noise from loading, truck circulation, and equipment
- Visual impacts from large structures, outdoor storage, and lighting
- Potential air quality and odor impacts depending on the permitted uses

These factors are well-documented contributors to reduced residential property values. Edgewood has consistently emphasized protecting existing neighborhoods from incompatible adjacent uses, and this amendment would undermine those priorities.

2. Noise, Light, and Air Quality Concerns

Industrial operations typically involve:

- Early-morning and late-evening truck movements
- Backup alarms, loading activities, and mechanical equipment
- High-intensity lighting for security and operations
- Potential emissions from diesel trucks and industrial processes

Given the steep topography of the corridor, noise and light will travel upward toward existing homes, amplifying impacts. The City's land-use study acknowledges the presence of steep slopes and sensitive areas, but it does not fully address how industrial activity will affect the residents living directly above the corridor.

3. Traffic and Safety Impacts

While the study suggests industrial uses may generate fewer *peak-hour* trips than commercial development, it does not address:

- Increased heavy-truck traffic throughout the day
- Safety concerns at intersections already experiencing severe congestion
- Impacts on local streets used by residents, school buses, and pedestrians
- Cumulative effects when combined with industrial traffic from Sumner and Pacific

SR-167 access does not eliminate the need for trucks to use local roads, and the corridor is already strained during certain times of day.

4. Incompatibility with Existing Neighborhood Character

The surrounding area, west of West Valley Highway, is predominantly residential, with long-established neighborhoods situated directly above the proposed industrial zone. Edgewood's goals include:

- Protecting the character and livability of existing neighborhoods

- Ensuring transitions between land-use types are appropriate and compatible
- Avoiding placing high-impact uses adjacent to residential areas

Re-designating this corridor to Industrial directly conflicts with these goals. The steep slopes and limited buffering capacity make it impossible to adequately separate industrial activity from nearby homes.

5. Insufficient Consideration of Alternatives

While the SCJ Alliance study recommends Industrial zoning, it appears to focus primarily on physical constraints rather than the social, environmental, and neighborhood impacts. Other alternatives — such as low-impact employment uses, conservation-oriented zoning, or limited residential development — were not fully explored in the public materials. A Comprehensive Plan amendment should balance economic goals with the protection of existing residents, and I do not believe this proposal achieves that balance.

Conclusion

I respectfully request that the Planning Commission **deny** the proposed amendment or, at minimum, require additional analysis of:

- Residential property value impacts
- Noise, light, and air quality effects on homes located above the corridor
- Traffic and safety implications for local streets
- Alternative land-use designations that better protect existing neighborhoods and the environment

I appreciate your consideration and your commitment to thoughtful long-range planning. I ask that the Edgewood prioritize the health, safety, and stability of existing residents when evaluating this proposal.

Sincerely,

Cindy Casey
425-830-4334
12415 8th St E
Edgewood, WA 98372

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Josh Kubitza

From: Chrissanda Walker <Chrissandaw@sumnerwa.gov>
Sent: Tuesday, April 14, 2026 4:27 PM
To: comdev
Cc: Ryan Windish
Subject: City of Sumner Comments: 25-001-COMP PLAN
Attachments: WVH Sewer Capacity Analysis Memo-FINAL.pdf

***This message is from an External Sender**

Hello City of Edgewood-

Please see comments below related to the proposed West Valley Hwy E Comp Plan Rezone:

1. There are 7 parcels (0420111003; 0420111027; 0420118003; 4495400932; 4495400961; 4495400962; 4495400970) that fall within the city of Sumner sewer service area. It is recommended that as peak sewer flows from the Edgewood parcels near approximately 250 gpm, that capacity improvements be made in order to accommodate future development. Refer to the attached Sewer Technical Memorandum for West Valley Highway dated December 23, 2025 for more information.
2. The City of Sumner Municipal Code establishes sewer rate surcharges for properties located outside city limits. As a result of the proposed rezone, future development may be subject to higher sewer rate fees
3. The proposed rezone of the few disjointed parcels into Industrial is not consistent with the interchange-commercial zoning in Sumner along West Valley Hwy. It is recommended to pursue a rezone with consolidated parcels and alternative zoning consistent with the area.

Thank you for the opportunity to comment.

Chrissanda Walker | Associate Planner

Community Development

[City of Sumner](#)

1104 Maple St.

Sumner, WA 98390

253.299.5523 – Phone

253.299.5529 – Fax



Follow us on Twitter [@CityofSumnerWA](#)

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Josh Kubitza

From: Deborah Maute <d.maute00@yahoo.com>
Sent: Thursday, April 2, 2026 6:45 PM
To: comdev
Subject: WEST VALLEY HWY E COMP PLAN REZONE File# 25-001-COMP PLAN

Categories: Kai

*This message is from an External Sender

I just received notice of this rezoning plan. I live on the bluff above the area in question and am very concerned about this. I'd like to be a party of interest and would like to be notified of the upcoming hearing and any news about this issue.

Thank you,

Debbie Maute

805 125th Avenue Ct E

Edgewood, WA 98372

Sunrise Subdivision

253-886-1107

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Josh Kubitza

From: gurvinder khehra <Gurvinder-khehra@hotmail.com>
Sent: Monday, April 13, 2026 5:14 PM
To: comdev
Subject: 1618 W valley hwy E

***This message is from an External Sender**

Hello,

I wanted to submit my comments about the rezone of West Valley Hwy.

We live at 1618 W Valley Hwy E, Edgewood, WA 98372. This area is not suitable for residential.

167 hwy is extremely loud 24/7. Very strange people go by daily on W valley Hwy road. People often dump trash in front of our house. We hear guns being fired pretty regularly. My wife never wants to stay home alone. Please turn this area commercial, that way businesses can move in and clean up this whole area. I would also like to request the city to install street lights on w valley hwy east, if possible.

Thank you.

Sent from my T-Mobile 5G Device

Get [Outlook for Android](#)

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803 124TH Ave East
Edgewood, WA 98372

April 11, 2026

City of Edgewood

Department of Planning and Development
10440 Dom Calata Way East
Edgewood, WA 98372

Re: File #25-001 – Comprehensive Plan Amendment – West Valley Hwy E Rezone

Dear Planning Department,

We recently became aware of the above-referenced application requesting that several parcels along West Valley Highway East be rezoned from Residential/Commercial to Industrial. As residents and property owners in Sunrise Estates—located directly above the parcels included in this proposal—we would like to formally express our concerns.

First, we are concerned that we did not receive direct notification from the City regarding this application, despite the proximity of our property and the potential impact this zoning change may have on our neighborhood. We only learned of this proposal through communication with a neighbor.

More importantly, we are concerned that the proposed rezoning could significantly affect our ability to enjoy our property as intended, as well as negatively impact property values within our community.

Our neighborhood is already experiencing the effects of increased traffic along Highway 167 due to the rapid expansion of warehouse development throughout the Sumner Valley. We chose to reside in Edgewood because it offers proximity to urban centers—approximately 20 minutes to Tacoma and 30 minutes to Seattle—while still maintaining a rural and residential character. Many properties in our area include acreage and support agricultural and hobby farming uses, which contribute to the unique character of this community.

The current Residential/Commercial zoning designation for this section of West Valley allows for housing and public-facing businesses that are more compatible with the surrounding area. In contrast, industrial zoning would allow for uses such as manufacturing and warehousing, which may introduce increased noise, air pollution, heavy equipment activity, and significantly higher volumes of semi-truck traffic. These impacts are not consistent with the existing character of our neighborhood and raise concerns regarding environmental quality and livability.

We respectfully request to be designated as a Party of Interest for this application and ask to be notified of any upcoming public hearings or opportunities for public comment. In the meantime, we appreciate your consideration of our concerns and request that this letter be included in the official record for review by the Planning Commission.

Thank you for your time and consideration.

Jeff Easter 253-292-7369 JEaster1952@gmail.com
Tina Vasen 253-219-1921 Tina.Vasen@gmail.com

Josh Kubitza

From: Jon Thieman <jwthieman@comcast.net>
Sent: Saturday, April 11, 2026 9:18 AM
To: comdev
Subject: West Valley Hwy E Comp Plan Rezone

***This message is from an External Sender**

We are very concerned about the environmental, traffic and property value impacts of the West Valley HWY E Comp Plan Rezone.

Please register us as parties of interest for this matter.

Jon and Harriet Thieman
815 125th Ave Ct E
Edgewood, WA 98372

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Josh Kubitza

From: DIANE NELSON <dlnelson25@comcast.net>
Sent: Monday, April 13, 2026 10:49 AM
To: comdev
Subject: WEST VALLEY HWY E COMP PLAN REZONE

***This message is from an External Sender**

File #: 25-001-COMP PLAN

We are very concerned about this rezoning along the West Valley Highway and would like to be notified of Planning Commission Docket Hearings or any other meetings regarding this request to rezone.

Linden and Diane Nelson
2317 126th Ave Ct E
Edgewood WA 98372
email: dlnelson25@comcast.net

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Josh Kubitza

From: marv perrin <mp100@hotmail.com>
Sent: Saturday, April 11, 2026 10:52 AM
To: comdev; marv perrin; Jon Thieman
Subject: Rezone West Valley Hwy Overlay area

***This message is from an External Sender**

To whom it may concern,

My name is Marv Perrin. I have lived in the Sunrise Community for about 25 years. It has been brought to my attention there is efforts to rezone the "West Valley Overlay Area" from R/S to Industrial. (File # 25-001 comp plan)

I understand this would financially benefit the applicants, however it would definitely have a negative effect for many homes and neighborhoods residing along the ridge above this zone.

I would like to voice my concern as well as my request for this application to be denied. I truly believe if granted, it will not only have a long term negative impact on the homes I mentioned, but of all of Edgewood. We are a quiet desirable community surrounded by traffic and industry. To allow that to encroach even more will erode that desirability, our home values and quality of life.

Thank you for your assistance in advance.

Marv Perrin

253 970 1449

810 124th Ave E
Edgewood WA 98372

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Josh Kubitza

From: PAUL & DESNEE JOOS <eyeisit@comcast.net>
Sent: Monday, April 13, 2026 5:42 PM
To: comdev
Cc: PAUL & DESNEE JOOS
Subject: comprehensive plan and rezone 25-001

***This message is from an External Sender**

I fully support this rezone because of changed conditions:

Conditions in the West Valley Highway Corridor have fundamentally changed since the original residential/commercial zoning was adopted.

The corridor has evolved with freight operations, commercial vehicle storage, and industrial activity that is incompatible with the residential designation.

The area no longer functions as a residential neighborhood, and the zoning should reflect what the corridor has become.

Thank you ,

Paul Joos

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Josh Kubitza

From: Sarah Torzillo <sarahmtorzillo@gmail.com>
Sent: Friday, April 10, 2026 3:13 PM
To: comdev
Cc: Paul Torzillo
Subject: West Valley Hwy E Comp Plan Rezone

***This message is from an External Sender**

Hello,

We would like to be added to your email list for all information/communications on this project. Please see emails below.

We are concerned with how moving forward with this plan will affect our property in Edgewood as our property is on a critical slope.

Thank you,
Sarah.

sarahmtorzillo@gmail.com
paultorzillo@gmail.com

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Josh Kubitza

From: Sonihal Singh <sonihalsingh25@gmail.com>
Sent: Wednesday, April 8, 2026 9:33 PM
To: comdev
Subject: Rezone Comments

***This message is from an External Sender**

The properties in the West Valley Highway Study Area are suitable for industrial development as-is, without need for variances. The parcels are large, flat, and have direct frontage on a major arterial corridor with proximity to SR-167 and freight infrastructure. The physical characteristics of this land — large lot sizes, arterial access, valley floor topography — are ideally suited for industrial use, not residential.

This is an external email. Please use caution when opening any attachments.

Josh Kubitza

From: Tom Nettlebeck <tom@hillsideroofing.com>
Sent: Sunday, April 12, 2026 6:48 PM
To: comdev
Subject: File # 25-001-COMP PLAN West Valley HWY Rezone

***This message is from an External Sender**

We are Tom Nettlebeck and Graciela Arce; we live at 819 125th Ave Ct E right above the subject property. I was born in Seattle and have raised my family here. We own three businesses in Washington State: Hillside Roofing has three locations (Everett, Auburn, and Tacoma), Crown Roofing has one location in Edmonds, and Rot Stopper Downspouts has a location in Everett. Rot Stopper Downspouts is a manufacturing business, and due to the demand for our products across the Country we use many partners to manufacture them. We are familiar with some of the negative impacts on the communities near our industrial partners, especially those just up on the ridge above. I moved from Gig Harbor to the Everett area for business in August 2017 with the goal of moving back down south into a forever home closer to our six grandsons. Graciela and I moved into that home in the city on Edgewood in March 2025. We love our neighbors, neighborhood and our new community. We are close enough to industrially zoned land and if it moves any closer this will not be our forever home. Industrial zoned property straight down the steep hill from our home will further reduce our property value, create unknown pollution and exhaust, and increase the current noise level. Our home already has special windows trying to keep it quiet and livable but they barely succeeded, even without moving the industrial park closer to our home. Our home was on the market for almost six months in 2024 but didn't sell in a very hot market. When we bought it in 2025, it was priced below market value due to the existing industrial park. It took us much longer than expected to find our forever home and we ask that you stop this ridiculous plan. We encourage everyone making this decision to visit our beautiful but noisy home to see it for yourself. Just let us know and we will provide our gate code. We are not trying to get in the way of growth but we are trying to divert the City of Edgewood from destruction.

Thank you
Tom Nettlebeck
Graciela Arce

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Josh Kubitza

From: Uuganaa munkh <uuganaa_munkh@yahoo.com>
Sent: Wednesday, April 8, 2026 12:47 PM
To: comdev
Subject: Re: Questions about a property

***This message is from an External Sender**

I understand, can I build 2 houses if i bought this land? And are you willing to email me the city councils final decision when they make it?

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, April 8, 2026, 9:30 AM, comdev <comdev@cityofedgewood.org> wrote:

Hello

This lot is currently zoned residential-1 and truck services or warehouse are not allowed uses in this zone, but the city just started the process of rezoning that area and there is no determined date when this rezone will pass because it is city council decision. As of right now we are in the public comment period.

Kakai,

From: Uuganaa munkh <uuganaa_munkh@yahoo.com>
Sent: Tuesday, April 7, 2026 1:37 PM
To: comdev <comdev@cityofedgewood.org>
Subject: Questions about a property

***This message is from an External Sender**

Hello my name is Amarzaya Altantsetseg,

I was speaking to an agent Alex Tomev who is selling a land Grid#2498888 at a price of \$89,000. I asked him if I could build a truck service or warehouse with the property and he said I needed to email you guys to see if it is possible. If not is there anything else i can do with the property if i buy it?

Thank you for your time.

[Sent from Yahoo Mail for iPhone](#)

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TECHNICAL MEMORANDUM

Date: December 23, 2025
To: Andrew Leach, PE; City of Sumner
From: Kevin Cook, PE, Sudip Gautam, PhD; BHC Consultants, LLC
Subject: West Valley Highway Sewer Zoning Area – Sewer Capacity Analysis



Kevin Karl Cook, PE
BHC Consultants, LLC

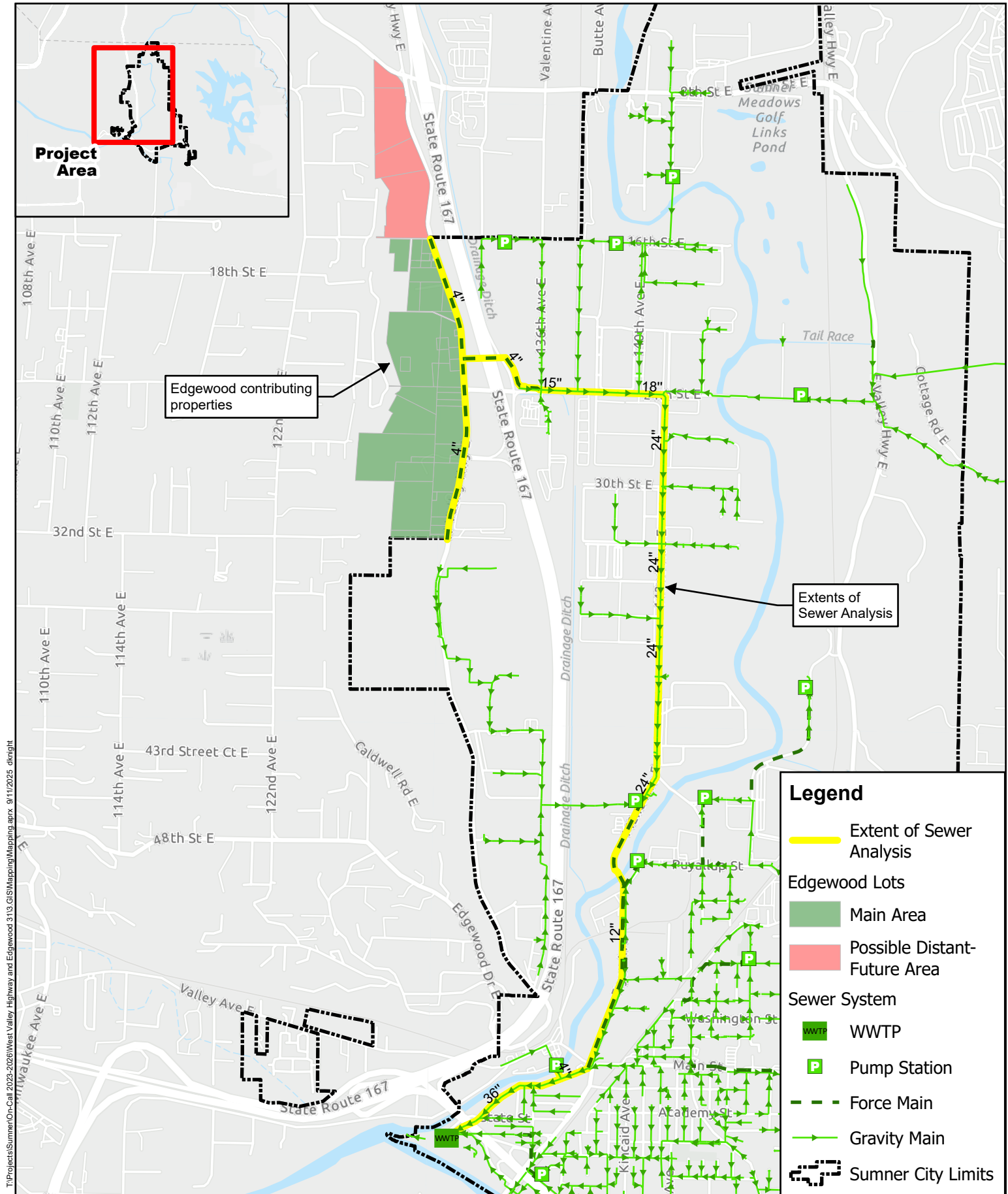
1. Introduction

The City of Sumner (City) owns, operates, and manages wastewater collection and treatment facilities, including gravity sewer pipes, sewer force mains, and pump stations. In coordination with the City of Edgewood (Edgewood), the City is evaluating the feasibility of providing sewer service to several properties located west of West Valley Highway.

To support this potential expansion of the sewer service area, the City has engaged BHC Consultants, LLC (BHC) to conduct an engineering analysis of potential impacts on the City's sewer utility system. BHC previously developed the City's hydraulic sewer collection system model as part of the 2018 General Sewer Plan (Sewer Plan). This model, which has since been updated for development-related assessments, will serve as the primary tool for evaluating sewer utility impacts.

The analysis will assess system performance under existing conditions and projected conditions through the year 2038, consistent with prior analyses to align with the City's Sewer Plan. Figure 1 shows the approximate location of the Edgewood parcels under consideration, along with the existing sewer pipes and modeled infrastructure included in this evaluation.

Most of the area is currently undeveloped and zoned Single Family Residential. Once flows are introduced at the existing septic tank effluent pumping (STEP) system connection points, the force main crosses State Route (SR) 167 and conveys wastewater to the gravity main located on the east side of SR 167.



T:\Projects\Summer\On-Call 2025-2026\West Valley Highway and Edgewood 3115 GIS\Mapping\Maping.aprx 9/11/2025 dlight

This map is a geographic representation based on information available. No warranty is made concerning the accuracy, currency, or completeness of data depicted on this map.

bhc
CONSULTANTS

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0 500 1,000 2,000 Feet



Sewer Vicinity Map
West Valley Highway
Sewer Capacity
City of Sumner, WA
September 2025

Figure

1

2. Background and Assumptions

The City's 2018 Sewer Plan provides the basis for sewer flow projections, model deficiency criteria, and modeling assumptions. The hydraulic model developed for the 2018 Sewer Plan, and subsequently used for capacity analyses, serves as the baseline for this evaluation. Systemwide flow projections for 2024 and 2038 are consistent with those established during the development of the Sewer Plan.

The following assumptions are applied in this analysis:

- Sewer System Infrastructure: Because the Edgewood parcels under consideration lie outside the existing sewer service area, no new sewer facilities were created in the model to introduce projected flows. Instead, potential pipeline upgrades or other necessary improvements were modeled as needed, and their impacts on previously identified improvements were documented.
- STEP System: The STEP system is assumed to function as a low-pressure force main in which multiple individual grinder pumps, equipped with backflow check valves, work collectively to convey wastewater to the gravity main on the east side of SR 167.
- Sewer Capacity Analysis Limits: The capacity analysis extends from the assumed STEP system connection points along West Valley Highway through to the wastewater treatment plant (WWTP).

The following sources were used to supplement the data and information used in the analysis:

- Hydraulic model of the sewer collection system from the Sewer Plan.
- Map of the proposed site provided by the City.
- Flow estimates provided by the City.
- Correspondence with City.
- Washington State Department of Ecology's Criteria for Sewage Works Design (Orange Book).
- City GIS data.

3. Additional Flows from the Edgewood Land Parcels

Edgewood, in coordination with the City, provided preliminary estimates indicating that 50 to 100 acres of developable land may discharge into the City's STEP system. Based on Edgewood's estimates, conservative wastewater loading rates of 3,000 to 4,500 gallons per day per acre (gpd/acre) were assumed for these parcels.

To capture the range of potential impacts, two flow scenarios were analyzed:

1. Low-Flow Scenario: 50 acres of developable area with wastewater loading 3,000 gpd/acre.
2. High-Flow Scenario: 100 acres of developable area with wastewater loading 4,500 gpd/acre.

Wastewater loading estimates were assumed to represent dry weather flow (DWF) only. The average DWF was adjusted using a peaking factor of 1.43, consistent with the diurnal time pattern applied in the model, to calculate the peak dry weather flow (PDWF). Wet weather flow (WWF) contributions were estimated using a peak infiltration and inflow (I/I) rate of 641 gpd/acre, as established in the City's 2018 Sewer Plan.

Table 1 summarizes the flow estimates for both scenarios. Under the low-flow scenario, the additional peak flow introduced to the City's sewer conveyance system is approximately 171.2 gpm, while the high-flow scenario produces an estimated 491.4 gpm.

Table 1
Sewer Flows from Edgewood Land Parcels

Description	Low Flow Scenario	High Flow Scenario
Developable area (acres)	50	100
Wastewater loading (gpd/acre)	3,000	4,500
Average dry weather flow (gpm)	104.2	312.5
Peaking factor	1.43	1.43
Peak dry weather flow (gpm)	149.0	446.9
Peak I/I rate (gpd/acre)	641	641
Peak wet weather flow (gpm)	22.3	44.5
Total peak sewer flow (gpm)	171.2	491.4

These flows were incorporated into the hydraulic model as combined peak wet weather flows, evenly distributed among the STEP system within the model. The peak flow estimates apply conservative assumptions to account for potential variability in future development intensity and system response.

4. Sanitary Sewer Collection System Analysis

The hydraulic model of the City's collection system, originally developed as part of the Sewer Plan, was used to evaluate potential infrastructure impacts from the additional flows. Model simulations focused on conditions in the vicinity of the Edgewood parcels and extended downstream through the conveyance system to the WWTP.

The model scenarios were run, and the conveyance system deficiencies were identified based on further analysis of model results. To determine the location of capacity issues within the collection systems, the following guidelines were observed, which is consistent with the Sewer Plan:

- Gravity Pipe Segments: The flow depth is equal to or greater than the pipe diameter ($d/D > 1$).
- Force Main Segments: The flow velocity exceeds 8 feet per second (ft/s).
- Manholes: The manhole is flooding, leading to sewer overflow.
- Pump Stations: The rated capacity is exceeded.

Industry standard engineering judgment was used to review the simulated results such that the results provided a meaningful planning tool for the City and that deficiencies were being identified appropriately for the purposes of this analysis.

4.1 Existing Conditions (2024) Model Results

No deficiencies were identified on the gravity main pipes, manholes, or pump stations under existing conditions for either the low-flow or high-flow scenarios.

In the low-flow scenario, peak velocity in the force main remains within the allowable design limit.

In the high-flow scenario, however, the increased peak flow entering the STEP system causes the 4-inch diameter STEP force main (City GIS ID: SML C3-50) located between West Valley Highway and 136th Avenue East to exceed the allowable velocity of 8 ft/s.

4.2 Projected Conditions (2038) Model Results

No deficiencies were identified in the gravity main pipes, manholes, or pump stations under projected 2038 conditions for either the low-flow or high-flow scenarios.

In the low-flow scenario, peak velocity in the force main remains within the allowable design limit, consistent with the existing conditions results.

In the high-flow scenario, however, the increased peak flow entering the STEP system causes the 4-inch diameter STEP force main (City GIS ID: SML C3-50) located between West Valley Highway and 136th Avenue East to exceed the allowable velocity of 8 ft/s.

5. Summary of Findings

Under the low flow scenario, representing 50 acres of developable area at 3,000 gpd/acre and producing an additional peak sewer flow of 171.2 gpm, no deficiencies were identified under existing or 2038 conditions.

Under the high flow scenario, representing 100 acres of developable area at 4,500 gpd/acre and producing an additional peak sewer flow of 491.4 gpm, similar deficiencies were identified under both existing and projected conditions. Specifically, the 4-inch diameter STEP force main (City GIS ID: SML C3-50), located between West Valley Highway and 136th Avenue East, exceeded the allowable velocity limit. This force main segment has a GIS-recorded length of 1,636 feet.

If flows from the Edgewood parcels approach the high-flow scenario, the 4-inch force main would need to be upsized to a 6-inch diameter to accommodate the increased flow while maintaining peak velocity within acceptable design limits. Model results indicate no adverse downstream conditions as a result of this upsizing.

Based on the modeling results, it is recommended that as peak sewer flows from the Edgewood parcels near approximately 250 gpm, that capacity improvements be made in order to accommodate future development. Peak flows from new developments are difficult to accurately predict and are subject to numerous other variables. In the short-term and limited development, the existing infrastructure should have capacity, but as the proposed development reaches higher levels of development, sewer infrastructure capacity upgrades are recommended. This can be achieved via future flow projections that are more directly tied to refined development plans as well as field investigation and monitoring of the identified area of concern.

6. Limitations and Uncertainty

The hydraulic models of the City's sanitary sewer systems that were previously developed as a part of the Sewer Plan were used to evaluate the utility impacts in this evaluation, and thus all the previous assumptions and limitations also apply to this analysis. Additional limitations of this analysis include the following:

- Previous development assumptions regarding land usage may be different based on actual developments that have occurred.
- Infiltration and inflow (I/I) characteristics are subject to change and dependent on numerous factors that impact peak flow including but not limited to precipitation characteristics, pipe condition, operations and maintenance.
- Accuracy of the City's GIS data was not performed as part of this analysis.



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Coastal Region • Region 6 • 48 Devonshire Road, Montesano, WA 98563-
9618 Telephone: (360) 249-4628 • Fax: (360) 249-1229

October 6, 2025

City of Edgewood Community Development
ATTN: City of Edgewood
2224 104th Ave E,
Edgewood, WA 98372

To whom it may concern,

Thank you for the opportunity to comment on the West Valley Highway Rezone Amendment proposed by the city of Edgewood. The Washington Department of Fish and Wildlife (WDFW) is dedicated to preserving, protecting, and perpetuating the state's fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities. In recognition of our responsibilities, we submit the following comments for the West Valley Highway Rezone Amendment. Other comments may be offered in the future.

Project Area of Potential Effect:

The West Valley Highway Overlay shown in Figure 1 of the project's SEPA checklist.

Fish and Wildlife Resources and Recommendations:

WDFW respectfully disagrees with the City of Edgewood's determination of non-significance for this proposed project.

The area of proposed rezone is located within a biodiversity area mapped on [WDFW PHS on the Web](#). Biodiversity areas are defined in the [Priority Habitats and Species List](#) as areas of habitat that are important to various species of native fish and wildlife. Forested patches and biodiverse areas are becoming increasingly rare in urban landscapes and are extremely valuable to local and migratory wildlife. Biodiverse areas can support a varied community of species by providing refuge to wildlife in the cityscape, including habitat for birds and bats in an area where it may otherwise be limited, and are considered crucial for the continued persistence of many species in the local ecosystem. For these reasons, the Washington Department of Fish and Wildlife opposes the proposed rezone and recommends no change to the current zoning, as preserving these forested and biodiverse areas is essential for maintaining critical habitat and supporting the ecological integrity of the region.

The area of proposed rezone includes four Type F streams, and six Type N streams which per Edgewood Municipal Code [14.50.030](#) would require a 100-foot buffer for the Type F streams, a

60-foot buffer for Type Np streams, and a 35-foot buffer for Type Ns streams. WDFW recommends the implementation of these standard buffer widths at a *minimum*, as they are critical to maintaining current stream function, protecting water quality, and preserving fish and wildlife habitat.

According to the City of Edgewood's [GIS Map](#), the area of proposed rezone lies within a Critical Area of Erosion and Landslide Hazard Area. WDFW is concerned that industrial development in this geologically hazardous area could result in the loss or degradation to valuable fish and wildlife habitat. In addition, development within a geologically hazardous area poses risks to water quality, particularly for salmonids and other sensitive aquatic species. The combination of steep slopes and increased runoff from impervious surfaces can lead to elevated sedimentation and pollutant loads in nearby streams degrading habitat quality and ecological function. Rezoning to permit industrial development would necessitate deforestation, excavation, and grading, which could further exacerbate these impacts by increasing turbidity, sedimentation, and stream flashiness within the local watershed.

WDFW recommends that the West Valley Highway area remain zoned as Residential-1 and Commercial. WDFW acknowledges that the City of Edgewood is currently in the process of updating its municipal code, including potential revisions to buffer standards for Fish and Wildlife Habitat Conservation Areas. Regardless of any future code changes, WDFW strongly recommends that full, science-based stream buffers be maintained for all streams within the proposed rezone area to protect critical aquatic and riparian habitat.

If you have any questions or concerns, please feel free to contact me at (360)480-2908 or Miles.Penk@dfw.wa.gov.

Sincerely,



Miles Penk
WDFW Area Habitat Biologist
1111 Washington St SE
Olympia, WA 98501

Cc: Gwen Lentes, Regional Habitat Program Manager (Gwendolen.Lentes@dfw.wa.gov)
Megan Tuttle, Assistant RHPM (Megan.Tuttle@dfw.wa.gov)
Jessica Bryant, Regional Land Use Lead (Jessica.Bryant@dfw.wa.gov)
Brady Green, Habitat Biologist (Brady.Green@dfw.wa.gov)



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Southwest Region Office
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

October 10, 2025

Josh Kubtza, Planning Manager
City of Edgewood
Community Development Department
2224 104th Avenue East
Edgewood, WA 98372-1513

Dear Josh Kubtza:

Thank you for the opportunity to comment on the determination of non-significance for the 2025 Annual Comprehensive Plan and Zoning Map Amendments Project (25-011-CODE) as proposed by City of Edgewood. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

SHORELANDS & ENVIRONMENTAL ASSISTANCE: Brook Swensen, (564) 999-1749

According to the Comprehensive Plan Amendment application materials, part of the proposed area to be changed to industrial has known or potential critical areas on site, including wetlands regulated under the Edgewood Critical Areas Ordinance and under the state Water Pollution Control Act (Chapter 90.48 RCW). I caution rezoning parcels completely encumbered in critical areas and their buffers as industrial because it would encourage large development in or close to known critical areas. Especially the area currently designated as public space with known critical areas. Any future division of the property and developments should create sufficient buildable area located outside of any regulated critical area and associated setback or buffer and that access to the buildable area is located outside of said setbacks or buffers.

For questions or technical assistance, please contact Wetland Specialist Brook Swensen at Brook.Swensen@ecy.wa.gov or 564-999-1749

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(JKT:202504003)

Josh Kubtza
October 10, 2025
Page 2

cc: Brook Swensen, SEA



PUYALLUP TRIBE OF INDIANS



October 10, 2025

Via Electronic Mail

Josh Kubitza, Planning Manager
City of Edgewood
2224 104th Avenue East,
Edgewood, WA 98372.

RE: Determination of Non-Significance for the 2025 Annual Comprehensive Plan and Zoning Map Amendments (#25-011-CODE)

The Puyallup Tribe of Indians ("Puyallup Tribe" or "Tribe") submits the following comments regarding the Determination of Non-Significance for the 2025 Annual Comprehensive Plan and Zoning Map Amendments. The amendment to rezone several parcels from Residential and Commercial to Industrial apply to land that will have significant impacts on Tribal resources. As signatories to the Treaty of Medicine Creek, the Puyallup Tribe retains federally protected fishing rights in our usual and accustomed fishing grounds, as well as other reserved rights, and manages natural and cultural resources throughout Water Resource Inventory Area 10. This highly urbanized watershed encompasses the Port of Tacoma, the Puyallup River, tributaries to the Puyallup River, other streams, including the Milwaukee Ditch and Jovita Creek, and adjacent marine and estuarine habitats vital to the survival of salmon and other treaty-protected species. The Puyallup Tribe has Treatment as a State (TAS) and has the authority to issue Section 401 Certifications for waters within its jurisdiction and acts as a neighboring jurisdiction requiring notice and opportunity to object as provided in Clean Water Act Section 401(a)(2).

The Puyallup Tribe of Indians is a sovereign Indian Tribe whose government is recognized by the United States and the State of Washington. The Tribe has existed in and around the Edgewood, Fife, Tacoma, Puyallup, the Commencement Bay area of Puget Sound and the Puyallup River since time immemorial. The Tribe's reservation and jurisdiction includes seven miles of the Puyallup River. There are currently over 6,000 enrolled Tribal members. The Puyallup Indian Reservation is a highly urbanized Reservation located in the south end of Puget Sound's Commencement Bay and near the mouth of the Puyallup River, in Pierce County, Washington. The Tribe and its members have relied on salmon and other species in the Puyallup River and its tributaries, as well as streams such as the Milwaukee Ditch and Jovita Creek, since time immemorial. It places great importance not only on large waterbodies used for fishing,

but also on smaller streams, such as Jovita Creek, which provide valuable fish rearing and refuge habitat. As part of its efforts to protect water quality and, thereby, fish species which include listed species under the Endangered Species Act, the Tribe's authority under Clean Water Act section 401 allows the Tribe to protect its waters from discharges and activities that would have significant impacts to the water quality within the 1873 Survey Area of the Tribe's Reservation (which includes the Puyallup River and its Tributaries). Furthermore, the Tribe is often involved in participating in the Clean Water Act 401 Certification process to protect fisheries and other natural resources within the Usual and Accustomed Fishing areas of the Tribe as adjudicated in *United States v. Washington*, 384 F.Supp. 312, 370, Finding of Fact 99, 626 F.Supp. 1405, 1441, Finding of Fact 336; *see also Puyallup Tribe v. Dept. of Game of Wash.*, 391 U.S. 392 (1968) (*Puyallup I*), *Department of Game of Wash. v. Puyallup Tribe*, 414 U.S. 44 (1973) (*Puyallup II*), *Puyallup Tribe v. Dept. of Game of State of Wash.*, 433 U.S. 165 (1977) (*Puyallup III*).

The Puyallup Tribe is a signatory to the 1854 Treaty of Medicine Creek, 10 Stat. 1132, which provides for and defines the Tribe's interest in the native anadromous fishery within the Reservation and at usual and accustomed fishing areas. The Tribe is also a signatory to the August 27, 1988 Agreement Between the Puyallup Tribe of Indians, Local Governments in Pierce County, the State of Washington, the United States of America, and Certain Private Property Owners, ratified by the Puyallup Tribe of Indians Settlement Act of 1989, Pub. L. No. 101-41, Jun. 21, 1989, 103 Stat. 83.

The Puyallup River and the many interconnected streams within its drainage basin, upon which salmon depend for critical spawning, rearing, and refuge habitat, including Jovita Creek and Milwaukee Ditch, are of immeasurable cultural, spiritual and economic significance to the Tribe. The Tribe invests substantial resources in its fishery and water quality programs. Tribal biologists and scientists regularly work in coordination with state and federal resource agencies to preserve and enhance the region's fish and water resources. As the Tribe manages fisheries dependent on the Puyallup River, holds senior water rights in the Puyallup River basin, regulates water quality on the Puyallup Indian Reservation pursuant to Clean Water Act delegation, has extensive hatchery operations, and works tirelessly to preserve and restore essential fish habitat and populations, it has considerable interest in the protection water quality, prevention of harm to or take of salmon and trout species, and protection of other wildlife. Salmon and trout species, some of which are listed under the Endangered Species Act, rely on the clean cool water and critical habit to forage, migrate, and spawn, all of which are essential to the salmon life cycle and their continued existence.

Since time immemorial, Tribal members have fished in the waters of the Puyallup River and its tributaries, including the White River which flows into the Puyallup River.

The Milwaukee Ditch and Jovita Creek are both classified as fish bearing streams, and surveys have found at least Coho Salmon and ESA listed Steelhead in both water bodies. Both the Milwaukee Ditch and Jovita Creek provide critical rearing and refuge habitat for fish species. Water quality impacts to both Milwaukee Ditch and Jovita Creek will have impacts on juvenile fish reducing those fish that successfully migrate out of the Puyallup River. The Tribe conducts extensive efforts to preserve and enhance the fishery and fish habitat both within the exterior boundaries of the Reservation and at its treaty protected usual and accustomed fishing areas, including the Commencement Bay. See *United States v. Washington*, 384 F. Supp. 312 (W.D. Wash. 1974), *substantially aff'd*, 520 F.2d 676 (9th Cir. 1975), *cert. denied*, 423 U.S. 1086 (1976), *substantially aff'd sub nom. Washington v. Washington State Commercial Passenger Fishing Vessel Ass'n*, 443 U.S. 658 (1979); *United States v. Washington*, 506 F. Supp.187 (W.D. Wash 1980) (*Hatchery Fish and Phase II*), *vacated* 759 F.2d 1353 (9th Cir. 1980), *cert. denied*, 474 U.S. 994 (1985), *United States v. Washington*, 853 F.3d 946, 964 (9th Cir. 2017), *denying petition for reh'g and reh'g en banc, United States v. Washington*, 864 F.3d. 1017 (9th Cir. 2017) (*Phase II – Culverts Case*), *aff'd by an equally divided court, Washington v. U.S.*, 584 U.S. 837 (2018).

A DNS is wholly insufficient and violates SEPA for the Comprehensive Plan Amendments that rezone the subject parcels to industrial. In spite of the fact that there is no existing proposal to develop the land, the totality of the circumstances in this matter clearly demonstrates that future industrial development is probable following the City's amended zoning from residential and commercial to industrial. Surrounding industrial properties are fully developed as warehouse/logistics; large scale truck repair; heavy manufacturing; and freight line industries. The impacts from such developments are reasonably ascertained as a result of the surrounding developments and knowledge of the impacts from each use and should be analyzed as part of this change in use. Such impacts on the environment are significant and give rise to the responsibility to prepare an EIS under SEPA. Furthermore, the parcels proposed to be changed to industrial are large in area to support warehouse and logistics centers, which Edgewood has been permitting the past few years. It is reasonable to suspect that such developments, with their known impacts, will be seeking to develop the newly designated industrial properties. The location of the proposed use change not only has sufficient acreage, but has easy access to Highway 167, making ideal for transportation of goods to and from warehouse developments and large equipment maintenance. Furthermore, no matter what the eventual use of the property, the parcels subject to the proposed re-designation are forested and will require significant changes that will lead to significant impacts, as discussed below, to accommodate those industrial uses and the land required for such uses.

In the City's code, Ch. 18.70, specific uses are listed with whether they are allowed in particular land use categories. The following uses are outright forbidden in the commercial land use category but will be allowed after the proposed zoning change. The following uses represent the new uses that will be allowed if the zoning change is approved. For each use, one can expect significant impacts, all of which are well known given the surrounding uses and, therefore, should have resulted in a finding of significant environmental impacts giving rise to the need for an EIS for this proposed change in use.

1. **Crop production.**
2. **Animal production.**
3. **Electric Power Generation.**
4. **Sewage Collection or Treatment Facility.**
5. **Manufacturing.**
6. **Wholesale Trade.**
7. **Fuel Dealers.**
8. **Warehousing and Storage Facilities.**
9. **Large Vehicle and Equipment Rental**
10. **Commercial/Industrial Repair and Maintenance**

Examination of the above list reveals that each of those activities will have significant environmental impacts which are readily ascertainable. If there is similar development in the area a DNS is not appropriate. A MDNS would not be practical for a zoning change, and would be difficult to implement with a zoning change. An EIS is required if there are reasonably foreseeable significant impacts given the totality of the circumstances.

A quick review of the current surrounding industrial uses as identified above, the surrounding properties to the subject parcels include manufacturing, fuel dealers, warehousing and storage facilities, large vehicle and equipment rental, and commercial/Industrial repair and maintenance. It is unlikely any of the parcels subject to the proposed zoning amendment would be used as crop production or animal production due to the surrounding uses impacting the Milwaukee Ditch and the presence of residential areas on one side of the subject parcels. In light of the current Prologis Park development, it appears likely additional warehouse development will seek to be placed on the subject parcels due to its proximity to 167 and the need for

available land for such large projects. As we understand it there exists few remaining industrial properties for additional warehouse developments or any of the uses listed above. The City of Edgewood is aware of the impacts from warehouse developments, and is also aware of impacts from other existing industrial uses surrounding the subject parcels including, but not limited to, large vehicle and equipment rental, repair and maintenance and manufacturing.

The City of Edgewood is undoubtedly aware of the fact that Jovita Creek flows into the Milwaukee Canal which, in turn, flows into the White River. The White River is a tributary of the Puyallup and is home to three listed species. Jovita Creek and the Milwaukee Canal support a variety of salmon, including coho, chum, steelhead, sea-run cutthroat and resident trout. Additionally, WDFW identifies potentially fall Chinook and pink salmon use as well. Impacts to the Milwaukee Canal will necessarily impact both the Puyallup River and White River which, in turn, interferes with Tribal Treaty Rights. The city of Edgewood's 2024 Stormwater Management Program report acknowledges the inclusion of Jovita Creek in the Puyallup Rivers total maximum daily load (TMDL) for fecal coliform bacteria exceedances (Category 4A water under Clean Water Act 303(d)). Jovita Creek Boulevard is recognized as being a likely contributing source to stream impairment and the industrial development of this area, which will result in the construction of additional access roads, will almost certainly exacerbate this issue. Additionally, the lower end of Milwaukee Canal near its confluence with the White River is categorized as a water of concern (Category 2) for dissolved oxygen and temperature. The hillside encompassing the subject parcels support a number of small perennial and seasonal creeks as well as contributing a substantial amount of runoff to the Canal. The loss of canopy cover that will likely result from the industrial development of this area will reduce riparian shading and lead to an increase in water temperature and a corresponding reduction in dissolved oxygen, further impairing the Canal and raising the potential for future 303(d) listing.

Edgewood is also well aware of the impacts that can result from most of the uses that will be permitted once the parcels zoning is changed from residential and commercial to industrial because, as stated, most of those types of uses surround the subject parcel. Notably at the same time this DNS was issued, Edgewood has been preparing an EIS for a large-scale warehouse development. The following impacts generally apply to all the uses identified above with the exception of crop production or animal production, both of which are highly unlikely.

1. Increased traffic from large trailers or other large vehicles. Increased traffic will impact the air quality of the region (i.e. greenhouse gas emissions, particulate matter (PM), NO_x, VOC's, etc.), result in increased pollution from

stormwater, and impact noise levels. Each of these impacts are reasonably foreseeable as a result of identical or substantially similar uses in the area or undergoing project reviews that are similar in nature to the industrial uses allowed.

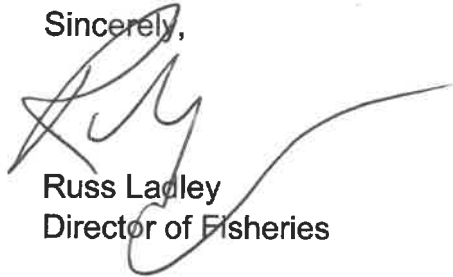
2. Increased stormwater can also be expected given the significantly increased impervious surface coverage anticipated from any of the allowed uses with a change in zoning to industrial development. Increases in impervious surfaces can also negatively impact regional hydrology via a decline in evapotranspiration and infiltration, as well as result in more frequent and severe flooding. Stormwater from any industrial use will contain contaminants which are readily ascertainable as a result of existing uses within the area and Edgewater as a whole.
3. Increased polluted discharge to the Milwaukee Canal from rooftops, impervious surfaces, increased vehicle fluid emissions due to high vehicle use, and increased discharge of auto maintenance pollution. Of particular concern is 6ppd-quinone pollution from tires, a compound that is highly toxic to certain species of salmon and trout. While industrial facilities often collect and treat stormwater runoff, this is typically not the case for roads. Such discharges to Milwaukee Canal, which will eventually reach the White River and Puyallup River, are foreseeable.
4. Increased temperatures in the waters of Milwaukee Canal due to loss of riparian canopy cover, which will go on to impact those of the White and Puyallup Rivers. These rivers already regularly exceed acceptable temperature thresholds.
5. Removal of the forest within the subject area will also reduce slope stability which will likely result in increased erosion, frequency of landslides, and sediment input (in particular, fine sediments) into the adjacent water bodies.
6. Large development projects that result in significant adverse impacts to the environment are often not fully mitigated for. For impacts that are mitigated, the mitigation is not always localized to the affected area (i.e. in lieu fee mitigation may be implemented and used for a project in an unrelated area).
7. Industrial development of the subject area will fragment the existing habitat, reducing its overall quality and ecosystem functions.

As discussed above, the proposed zoning change within the 2025 Annual Comprehensive Plan and Zoning Map Amendments has significant environmental

Josh Kubitza, Planning Manager, City of Edgewood
October 10, 2025
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impacts that are known, in spite of the lack of a distinct project proposal, given the totality of the circumstances within and around the subject parcels. As a result, a DNS is not sufficient and violates SEPA.

Sincerely,

A handwritten signature in black ink, appearing to read 'Russ Ladley', with a long, sweeping horizontal line extending to the right.

Russ Ladley
Director of Fisheries



CITY OF EDGEWOOD STAFF REPORT PLANNING COMMISSION AGENDA ITEM

Date: June 8, 2026

Title: Concurrency Code Updates

Attachments: Attachment A - DRAFT Redline Code Amendments

Submitted By: Jeremy Metzler, PE – Community Development Director

Background Information:

Concurrency Management regulations were adopted in 2017 under Ordinance 17-0499, codified in Edgewood Municipal Code (EMC) [Chapter 18.105](#). The purpose of this chapter is to implement the concurrency provisions of the city's Comprehensive Plan and General Sewer Plan, as applicable, in accordance with RCW 36.70A.070(6)(b), consistent with WAC 365-195-510 and 365-195-835. As codified, the chapter is solely focused on transportation concurrency.

As part of this year's annual report (required under EMC 18.105.220), staff asked the city's on-call transportation consultant, Transpo Group, to review this code and provide any recommendations for updates. The following list summarizes their suggestions:

- **Trip Threshold:** EMC 18.105.030(B) sets the concurrency evaluation threshold at project that generate either a) one or more vehicle trips through a failing intersection or roadway segment, or b) *"10 or more new p.m. peak-hour trips."* Transpo noted *"there is substantial remaining capacity across the system"*, and most of incoming development proposals generate more than 20 new p.m. peak-hour trips. For reference, the current fee for Concurrency Review is \$3,000 for all projects generating between 10 and 25 new trips. Therefore, to reduce costs for smaller developments, Transpo suggests considering a threshold increase from 10 to 20 trips.
- **Multimodal Level of Service (LOS):** EMC 18.105.070 currently states that concurrency LOS for road facilities is consistent with the Transportation Element of the City's Comprehensive Plan. The recently updated Transportation Element, however, includes additional LOS measures for pedestrian, bicycle, and transit facilities. While evaluating LOS measures for these active transportation modes is very important, staff is concerned that evaluating for concurrency on these modes would disable all development proposals located off Meridian Ave E (SR 161) for the foreseeable future. Therefore, to avoid conflict and confusion, we recommend revising EMC 18.105.070 to explicitly reference "vehicle LOS" as defined in the Transportation Element, rather than using the broader term "road facilities."
- **Annual Report Frequency:** EMC 18.105.220 currently requires annual reporting and monitoring. Based on recent application trends and the relatively limited pace of change in transportation system performance observed, along with a good amount of available capacity, Transpo suggests

that the city consider updating this section to allow for less frequent reporting, such as a bi-annual schedule. Reducing the reporting frequency could help streamline administrative efforts while still providing adequate monitoring to track system performance, identify emerging issues, and inform future transportation funding decisions, if needed.

Tentative Schedule:

May 11, 2026 – Planning Commission Introduction (COMPLETE)

June 8, 2026 – Planning Commission Discussion

June 19, 2026 – SEPA Issuance and Comment Period

July 13, 2026 – Planning Commission Public Hearing

August 10, 2026 – Planning Commission Recommendation

August 18, 2026 – City Council Study Session Introduction

August 25, 2026 – City Council Regular Meeting and Potential Action

Current Discussion:

Staff has reviewed the code sections referenced above and offers the attached draft code revisions for the PC's discussion and consideration.

Staff Recommendation:

Following tonight's conversation with the PC, staff recommends moving forward with scheduling a public hearing on this item as outlined in the Tentative Schedule, above. To allow adequate time for review and consideration of any public comments received, a formal recommendation by the PC to City Council may be considered at a subsequent PC meeting.

Chapter 18.105

CONCURRENCY MANAGEMENT

18.105.010 Purpose.

The purpose of this chapter is to implement the concurrency provisions of the transportation and utilities elements of the city's comprehensive plan, the water and sewer comprehensive plans, all in accordance with RCW 36.70A.070(6)(b), consistent with WAC 365-195-510 and 365-195-835. All applications that are not exempt (as defined herein) shall be processed under and shall comply with this chapter, which shall be cited as the city's "concurrency management ordinance."

18.105.020 Authority.

The director of public works or his/her designee shall be responsible for implementing and enforcing this concurrency management chapter.

18.105.030 Exempt development.

A. No development activity (as defined in EMC § 18.20.070) shall be exempt from the requirements of this chapter, unless the permit is listed below. The following types of permits are not subject to the capacity reservation certificate (CRC) process because they do not create additional long-term impacts on transportation facilities:

1. Administrative interpretations;
2. Sign permit;
3. Street vacations;
4. Demolition permit;
5. Street use permit;
6. Interior alterations of a structure with no change in use;
7. Excavation/clearing permit;
8. Hydrant use permit;
9. Right-of-way permit;
10. Residential remodeling with no change of use;
11. Plumbing permit;
12. Electrical permit;
13. Mechanical permit;
14. Excavation permit;
15. Sewer connection permit;
16. Driveway or street access permit;
17. Grading permit;
18. Tenant improvement permit;

19. Fire code permit;

20. Design review approval.

Notwithstanding the above, if any of the above permit applications will exceed the thresholds identified in subsection B of this section, such application shall not be exempt from the requirements of this chapter.

B. Transportation. This chapter shall apply to all applications for development or redevelopment, excluding an individual residential detached dwelling or middle housing unit, if the proposal or use will generate one or more new projected vehicle trips that will pass through an intersection or roadway section identified with a level of service below the acceptable level noted in the transportation element of the city's comprehensive plan, and/or a total of ~~4~~20 or more new p.m. peak-hour trips. Every application for development exceeding these thresholds shall be accompanied by a concurrency application, requiring the city to prepare a traffic report as defined in EMC § 18.105.090.

18.105.040 Capacity evaluation required for a change in use.

Any nonexempt development activity shall require a capacity evaluation in accordance with this chapter.

A. Increased Impact on Road Facilities. If a change in use will have a greater impact on road facilities than the previous use, as determined by the director, based on review of information submitted by the applicant and such supplemental information as available, a CRC shall be required for the net increase only; provided, that the applicant shall provide reasonably sufficient evidence that the previous use has been actively maintained on the site during the five-year period prior to the date of application for the capacity evaluation.

B. Decreased Impact on Road Facilities. If a change in use will have an equal or lesser impact on road facilities than the previous use as determined by the director, based on review of information submitted by the applicant and supplemental information as available, a CRC will not be required.

C. No Capacity Credit. If no use existed on the site for the five-year period prior to the date of application, no capacity credit shall be issued pursuant to this section.

D. Demolition or Termination of Use. In the case of a demolition or termination of an existing use or structure, the capacity evaluation for future redevelopment shall be based upon the net increase of the impact on road facilities for the new or proposed land use, as compared to the land use existing prior to demolition; provided, that such credit is utilized through a CRC within five years of the date of the issuance of the demolition permit.

18.105.050 Capacity evaluations required for certain rezones and comprehensive plan amendments.

A capacity evaluation shall be required as part of any application for a comprehensive plan amendment or zoning map amendment (rezone) which, if approved, would increase the intensity or density of permitted development. As part of that capacity evaluation, the director shall determine whether capacity is available to serve both the extent and density of development which would result from the zoning/comprehensive plan amendment. The capacity evaluation shall be submitted as part of the staff report and shall be considered by the city in determining the appropriateness of the comprehensive plan or zoning amendment.

18.105.060 All capacity determinations exempt from project permit processing.

The processing of applications pursuant to the authority in this chapter shall be exempt from project permit processing procedures as described in Chapter 18.40 EMC, except that the appeal procedures of Chapter 18.40 EMC shall apply as indicated in this chapter. The city's processing of capacity determinations and resolving capacity disputes involves a different review procedure due to the necessity to perform continual monitoring of facility and service needs, to ensure continual funding of facility improvements, and to develop annual updates to the transportation and utilities elements of the comprehensive plan.

18.105.070 Level of service standards.

A. Generally. Level of service (LOS) is the established minimum capacity of public facilities or services that must be provided per unit of demand or other appropriate measure of need, as mandated by Chapter 36.70A RCW. LOS standards shall be used to determine if public facilities or services are adequate to support a development's impact.

The concept of concurrency is based on the maintenance of specified levels of service through capacity monitoring, allocation and reservation procedures.

B. Specific public facilities and services. The city requires concurrency evaluations under the following categories:
~~Concurrency describes the situation in which road facilities are available when the impacts of development occur. For road facilities, this time period is statutorily established as within six years from the time of development. (See RCW 36.70A.070(6)(b) and WAC 365-195-210.)~~

1. Roads. Concurrency describes the situation in which road facilities are available when the impacts of development occur. For road facilities, this time period is statutorily established as within six years from the time of development. (See RCW 36.70A.070(6)(b) and WAC 365-196-210.) The city has designated levels of service for vehicle use of road facilities in the transportation element of the city's comprehensive plan:

- a. To conform to RCW 47.80.030 for transportation facilities subject to regional transportation plans;
- b. To reflect realistic expectations consistent with the achievement of growth aims; and
- c. For road facilities according to WAC 365-196-430 ~~5-325~~; and
- d. To prohibit development if concurrency for vehicle use of road facilities is not achieved (RCW 36.70A.070), and if sufficient public and/or private funding cannot be found, land use assumptions in the city's comprehensive plan will be reassessed to ensure that level of service standards will be met, or level of service standards will be adjusted.

18.105.080 Effect of LOS standards.

A. Roads. The director shall use the LOS standards set forth in the transportation element of the city's comprehensive plan to make concurrency evaluations as part of the review of any application for a transportation concurrency reservation certificate (CRC) issued pursuant to this chapter.

18.105.090 Capacity evaluations required prior to issuance of CRC.

A. A capacity evaluation for transportation shall be required for any of the nonexempt activities identified in EMC § 18.105.030.

B. The director shall utilize the requirements in EMC § 18.105.070 through 18.105.080 to conduct a capacity evaluation prior to issuance of a CRC. In addition to the requirements set forth in these sections, the director may also utilize state law or the Washington Administrative Code, or such other rules regarding concurrency, which may be established from time to time by administrative rule. In cases where LOS standards do not apply, the director shall have the authority to utilize other factors in preparing capacity evaluations to include, but not be limited to, independent LOS analysis.

C. A capacity reservation certificate (CRC) will not be issued except after a capacity evaluation performed pursuant to this chapter, indicating that capacity is available in all applicable city road facilities.

18.105.100 Application for capacity evaluation.

A. An application for a CRC and the application for the underlying development permit, or other activity, shall be accompanied by the requisite fee, as set forth in the city of Edgewood fee schedule. An applicant for the CRC shall submit the following information to the director, on a form provided by the director, together with the underlying development application:

1. Date of submittal;
2. Developer's name, address, telephone number and email;
3. Legal description of property as required by the underlying development permit application, together with an exhibit showing a map of the property;
4. Proposed use(s) by land use category, square feet and number of units;

5. Phasing information by proposed uses, square feet and number of units, if applicable;
6. Existing use of property;
7. Acreage of property;
8. Proposed site design information, if applicable;
9. The applicant's proposed mitigation (if any) for the impact on the city's transportation facilities;
10. Written consent of the property owner, if different from the developer;
11. Proposed request of capacity by legal description, if applicable;
12. Stormwater drainage report prepared by a licensed professional engineer.

B. Additional Information for Transportation Capacity Evaluations Only.

1. A preliminary site plan, which is a plan showing the approximate layout of proposed structures and other development, type and number of dwelling units, type and number of nonresidential building areas with gross square footage, the land use codes per the most recent edition of Trip Generation from the Institute of Transportation Engineers (ITE) and an analysis of the points of access to existing and proposed roadways;
2. The applicant is not required to submit a traffic impact analysis from an independent traffic engineer. Instead, those applicants with a transportation CRC application that are required to have the city provide a traffic report in accordance with EMC § 18.105.090 shall instead pay to the city a deposit equal to the estimated fee for the city's preparation of a traffic report. The amount of the deposit shall be as set forth in the city of Edgewood fee schedule and paid at the time the transportation CRC application is submitted. The fee shall vary based on the number of new p.m. peak-hour trips produced by the development. The applicant shall be subject to repayment of fees for any subsequent revisions to the original traffic report. Fees for revisions may be calculated in proportion to the original fee depending on the effort involved to revise the traffic report. Even if the traffic report is based on an estimate of the impact, the applicant will still be bound by the estimate of the impact, and any upward deviation from the estimated traffic impact shall require at least one of the following:
(a) a finding that the additional concurrency sought by the developer through a revised application is available to be reserved by the project; (b) mitigation of the additional impact under SEPA; (c) revocation of the CRC.

18.105.110 Submission and acceptance of a CRC application.

A. Notice of Application. Issuance of a notice of application for the underlying permit application shall be handled by the planning director or designee, following the process in Chapter 18.40 EMC. The notice of application required by Chapter 18.40 EMC shall state that an application for a concurrency determination has been received by the city.

B. Determination of Completeness. The planning director shall immediately forward all CRC applications received with development applications to the public works/engineering staff. Within 28 days after receiving an application for a CRC, the public works/engineering staff shall mail or personally deliver to the applicant a determination which states either:

1. That the concurrency application is complete; or
2. That the concurrency application is incomplete and what is necessary to make the application complete.

C. Additional Information. An application for a CRC is complete for purposes of initial processing when it meets the submission requirements in EMC § 18.105.100. The determination of completeness shall be made when the application is sufficiently complete for review, even though additional information may be required or project modifications may be undertaken subsequently. The director's determination of completeness shall not preclude the director's ability to request additional information or studies.

D. Incomplete Applications.

1. Whenever the city issues a determination that the CRC is not complete, the CRC application shall be handled in the same manner as a project permit application under Chapter 18.40 EMC.

2. Date of Acceptance of Application. An application for a CRC shall not be officially accepted or processed until it is complete and the underlying development application has been determined complete. When an application is determined complete, the director shall accept it and note the date of acceptance.

18.105.120 Method of capacity evaluation.

A. Generally. In order to determine concurrency for the purposes of issuance of a transportation CRC, the director shall make the determination described in subsections (B) and (C) of this section. The director may deem the development concurrent with transportation facilities, with the condition that the necessary facilities or services shall be available through a financial commitment in an enforceable development agreement (see Chapter 18.55 EMC). In no event shall the director determine concurrency for a greater amount of capacity than is needed for the development proposed in the underlying application.

B. Transportation.

1. Upon submission and acceptance of a complete transportation CRC application, the director shall conduct a traffic impact analysis and issue a traffic report for those applications meeting the requirements of EMC § 18.105.110(B)(1).

2. In performing the concurrency evaluation for transportation facilities, and to prepare the transportation CRC, the director shall determine, based on the conclusions of the traffic report, whether a proposed development can be accommodated within the existing or planned capacity of transportation facilities. This shall involve the following:

a. A determination of anticipated total capacity at the time the proposed impacts of development occur or within six years of such time;

b. Calculation of how much of that capacity will be used by existing developments and other planned developments at the time the impacts of the proposed development occur;

c. Calculation of the available capacity for the proposed development;

d. Calculation of the impact on the capacity of the proposed development, minus the effects of any mitigation identified by the applicant to be provided by the applicant at the applicant's cost;

e. Comparison of available capacity with proposed development impacts.

3. The director shall determine if the capacity of the city's transportation facilities, less the capacity which is reserved, can be provided while meeting the level of service performance standards set forth in the city's comprehensive plan, and if so, shall provide the applicant with a transportation CRC. The director's determination will be based on the application materials provided by the applicant, which must include the applicant's proposed mitigation for the impact on the city's transportation facilities.

C. Lack of Concurrency.

1. Transportation. If the director determines that the proposed development will cause the LOS of a city-owned transportation facility to decline below the standards adopted in the transportation element of the city's comprehensive plan, and improvements or strategies to accommodate the impacts of development are not planned to be made concurrent with development, a transportation CRC and the underlying development permit, if such an application has been made, shall be denied. Upon denial, the applicant may perform one of the following:

a. Appeal the findings of the traffic report in accordance with Chapter 18.40 EMC; or

b. Offer alternative data and/or perform an independent traffic impact analysis at the applicant's sole expense in support of alternative conclusions. Any study shall be in accordance with EMC § 18.105.090; or

c. Modify the development proposal to lessen the traffic impacts and/or identify voluntary transportation improvements as mitigation to be provided by the applicant at the applicant's cost and reapply for capacity review. Reapplication shall require repayment of the traffic report preparation fee in accordance with EMC § 18.105.100(B)(2); or

d. Withdraw the CRC application.

18.105.130 Purpose of capacity reservation certificate.

A. A transportation CRC is a determination by the director that: (1) the proposed development identified in the CRC application does not cause the level of service on a city-owned transportation facility to decline below the standards adopted in the transportation element of the city's comprehensive plan; or (2) that a financial commitment (embodied in a development agreement) is in place to complete the necessary improvements or strategies within six years. Upon issuance of a transportation CRC, the director will reserve transportation facility capacity for this application until the expiration of the underlying development permit or as otherwise provided in Chapter 18.40 EMC. Although the CRC may identify the number of projected trips associated with the proposed development, nothing in this chapter (including the trip transfer procedures) shall imply that the applicant "owns" or has any ownership interest in the projected trips.

18.105.140 Procedure for capacity reservation certificates.

After receipt of a complete application for a CRC, the director shall process the application in accordance with this chapter and issue the CRC or a denial letter.

18.105.150 Use of reserved capacity.

When a CRC and a development permit issue for a project, the CRC shall continue to reserve the capacity unless the development permit lapses or expires without issuance of a certificate of occupancy.

18.105.160 Transfer of reserved capacity.

Reserved capacity shall not be sold or transferred to property not included in the legal description provided by the applicant in the CRC application. The applicant may, as part of a development permit application, designate the amount of capacity to be allocated to portions of the property, such as lots, blocks, parcels or tracts included in the application. Capacity may be reassigned or allocated within the boundaries of the original reservation certificate by application to the director. At no time may capacity or any certificate be sold or transferred to another party or entity to real property not described in the original application.

18.105.170 Denial letter.

If the director determines that there is a lack of concurrency under the above provisions, the director shall issue a denial letter, which shall advise the applicant that capacity is not available. If the applicant is not the property owner, the denial letter shall also be sent to the property owner. At a minimum, the denial letter shall identify the application and include the following information:

A. For Roads.

1. An estimate of the level of the deficiency on the transportation facilities; and

2. The options available to the applicant such as the applicant's agreement to construct the necessary facilities at the applicant's cost.

B. For All. A statement that the denial letter may be appealed if the appeal is submitted to the city engineer within 10 days after issuance of the denial letter, and that the appeal must conform to the requirements in Chapter 18.40 EMC. Any appeal of a denial letter must be filed according to this section, prior to issuance of the city's decision on the underlying development application. If an appeal is filed, processing of the underlying development application shall be stayed until the final decision on the appeal of the denial letter.

18.105.180 Notice of concurrency determination.

A. Notice of the concurrency determination shall be given to the public together with, and in the same manner as, that provided for the SEPA threshold determination for the underlying development permit, unless the project is exempt from SEPA, in which case notice shall be given in the same manner as a final decision on the underlying development permit without any accompanying threshold determination. In the case of an approved CRC, any mitigation identified by the applicant to be provided by the applicant at the applicant's cost shall be included in the SEPA threshold determination or underlying permit decision (if categorically exempt from SEPA).

B. If a denial letter is not timely appealed, the underlying permit application will be processed and, in most instances, will result in a denial. If a denial letter is appealed, any mitigation or conditions included in the appeal decision shall be included in the SEPA threshold decision or underlying permit decision (if categorically exempt from SEPA).

18.105.190 Expiration of CRC and extensions of time.

A. Expiration. If a certificate of occupancy has not been requested prior to the expiration of the underlying permit or termination of the associated development agreement, the director shall convert the reserved capacity to available capacity for the use of other developments. The act of requesting a certificate of occupancy before expiration of the CRC shall only convert the reserved capacity to used capacity if the building inspector finds that the project actually conforms with applicable codes. If a complete underlying project permit application is expired as provided for in Chapter 18.40 EMC, the director shall convert any reserved capacity allocated to the underlying project permit for use by other developments.

B. Extensions for Road Facilities. The city shall assume that the developer requests an extension of transportation capacity reservation when the developer is requesting a renewal of the underlying development permit. No unused capacity may be carried forward beyond the duration of the transportation CRC or any subsequent extension.

C. If a CRC has been granted for a rezone or comprehensive plan amendment, the CRC shall expire when the development agreement for the comprehensive plan or rezone terminates. If there is no associated development agreement, the CRC shall expire within five years after the CRC approval anniversary date.

18.105.200 Appeals.

Upon receipt of an appeal of the denial letter, the director shall handle the appeal as follows:

A. A meeting shall be scheduled with the applicant to review the denial letter and the application materials, together with the appeal statement.

B. Within 14 days after the meeting, the director shall issue a written appeal decision, which will list all of the materials considered in making the decision. The appeal decision shall either affirm or reverse the denial letter. If the denial letter is reversed, the director shall identify the mitigation that the applicant proposes to provide at the applicant's cost, which will be imposed on the application approval in order to achieve concurrency.

C. The mitigation identified in the appeal decision shall be incorporated into the city's SEPA threshold decision on the application.

D. The appeal decision shall state that it may be appealed with any appeal of the underlying application or activity, pursuant to Chapter 18.40 EMC.

18.105.210 Purpose and procedure for administration.

A. "Capacity" refers to the ability or availability of water in the city's water system. "Capacity" refers to the ability to treat effluent in the city's wastewater treatment plant to the levels and volume limits in the city's NPDES permit. "Capacity" also refers to the ability or availability of road facilities to accommodate users, expressed in an approximate unit of measure, such as LOS for road facilities. "Available capacity" represents a specific amount of capacity that may be reserved by or committed to future users of the city's road facilities.

B. There are two capacity accounts to be utilized by the director in the implementation of this chapter for water, sewer and transportation. These accounts are:

1. The available capacity account; and

2. The reserved capacity account.

Capacity is withdrawn from the available capacity account and deposited into a reserved capacity account when a CRC is issued. Once the proposed development is constructed and an occupancy certificate is issued, the capacity is considered "used." Each capacity account of available or reserved capacity will experience withdrawals on a regular basis. Only the director may transfer capacity between accounts.

18.105.220 ~~Annual~~ Periodic reporting and monitoring.

A. The director is responsible for completion of ~~annual~~ periodic transportation capacity availability reports. These reports shall evaluate reserved capacity and permitted development activity for the previous ~~12-month~~ period, which shall be no less than 12 months and no greater than 24 months, and determine existing conditions with regard to available capacity for roads. The evaluations shall report on capacity used for the previous period and capacity available for the six-year capital facilities of the city's comprehensive plan, six-year transportation plan for road facilities, based on LOS standards. Forecasts shall be based on the most recently updated schedule of capital improvements, growth projections, public road facility inventories, and revenue projections, and shall, at a minimum, include:

1. A summary of development activity;

2. The status of each capacity account;

3. The six-year transportation plan;

4. Actual capacity of selected street segments and intersections and current LOS;

5. Recommendations on amendments to CIP and annual budget, to LOS standards, or other amendments to the transportation element of or to the comprehensive plan.

B. The findings of the ~~annual~~ periodic capacity availability report shall be considered by the council in preparing ~~the annual~~ updates to the capital improvement element, any proposed amendments to the CIP and six-year TIP, and shall be used in the review of development permits and capacity evaluations during the next period.

C. Based upon the analysis included in the ~~annual~~ periodic capacity availability reports, the director shall recommend to the city council ~~each year~~ any necessary amendments to the CIP, TIP and comprehensive plan. The director shall also report on the status of all capacity accounts when public hearings for comprehensive plan amendments are heard.

18.105.230 Road LOS monitoring and modeling.

A. The city shall monitor level of service standards through an annual update of the six-year transportation plan which will add data reflecting development permits issued and trip allocations reserved.

B. A new trip allocation shall be assigned for each traffic analysis zone, based on the results from the traffic demand model used by the city, to ensure that the city is achieving the adopted LOS standards described in this chapter and the transportation element of the comprehensive plan.

C. Amendments to the trip allocation program that exceed the total aggregate annual trip allocation per zone for any given year shall require an amendment to the comprehensive plan. Monitoring and modeling shall be required and must include anticipated capital improvements, growth projections, and all reserved and available capacity.

18.105.240 Traffic impact analysis standardized format.

Incorporated herein by this reference are the standardized Traffic Impact Analysis Guidelines, originally dated March 2012 or subsequently updated, of the required format for any submitted developer's independent traffic impact analysis. The traffic impact analysis may be completed at the time of submittal of the original application or upon denial of a transportation CRC application.



CITY OF EDGEWOOD STAFF REPORT PLANNING COMMISSION AGENDA ITEM

Date: June 8, 2026

Title: Multi-Family Tax Exemptions – Standards and Guidelines

Attachments: N/A

Submitted By: Jeremy Metzler, PE – Community Development Director

Background Information:

While staff hears a strong desire expressed by the community for non-residential uses in Edgewood, there continues to be weak economic demand for new dining, retail and office spaces. One factor for this is the high cost of new construction. Another complication, particularly along Meridian south of 24th St E, is the high cost of relocating overhead utilities underground.

RCW 84.14 allows local governments to adopt multi-family tax exemptions (MFTEs) by resolution. Edgewood is an eligible city per RCW 84.14.010(3)(c), and there are three tiers available for consideration:

- An 8-year property tax exemption for new residential construction, and
- A 12-year property tax exemption for new residential construction if 20% of the new units are set aside as affordable housing, and
- A 20-year property tax exemption for new residential construction if 25% of the new units are set aside as affordable housing.

Following RCW 84.14.040, any local ordinance designating MFTEs:

- must locate said MFTEs within an urban center (*such as the TC, MUR and C zones*),
- must lack sufficient affordable housing,
- requires a public hearing, and
- must adopt and implement standards and guidelines to be utilized in considering applications and making the determinations required under RCW 84.14.060.

Staff believe the last bullet is a key consideration here: our “standards and guidelines” can include provisions that require construction of non-residential spaces to accompany the proposed multi-family development, possibly above and beyond that which is already required by the development regulations. Also, the reduction in property taxes over time may offset a significant portion of the costs for relocating utilities underground - another factor which is proving to be a significant challenge.

Finally, by implementing local MFTE provisions, Edgewood may encourage development of more affordable housing units along the Meridian Corridor, preparing for compliance with recent case law and our next periodic Comprehensive Plan update.

Following staff's introduction to the City Council on March 17, 2026, they have referred this topic to the Planning Commission (PC) for further analysis and discussion, particularly with regard to the "standards and guidelines" component of the statute.

Resources:

- Sumner: [Multifamily Property Tax Exemption \(MFTE\) Program – City of Sumner](#)
 - SMC 2.52: <https://ecode360.com/47275552#47275552>
- Puyallup: <https://www.puyallupwa.gov/1950/Multi-Family-Tax-Exemption-Program>
- Tacoma: <https://tacoma.gov/government/departments/community-and-economic-development/housing-division/tax-incentives/>
 - TMC 6A.110: <https://cms.cityoftacoma.org/cityclerk/Files/MunicipalCode/Title06-TaxandLicenseCode.PDF>
- Department of Commerce website (including model code):
<https://www.commerce.wa.gov/growth-management/housing-planning/mfte/>

Tentative Schedule:

March 17, 2026 – City Council Introduction (COMPLETE)

April 13, 2026 – Planning Commission Introduction (COMPLETE)

May 11, 2026 – Planning Commission Discussion (COMPLETE)

June 8, 2026 – Planning Commission Discussion

June 26, 2026 – SEPA Issuance and Comment Period

July 13, 2026 – Planning Commission Public Hearing

August 10, 2026 – Planning Commission Recommendation

August 18, 2026 – City Council Study Session Introduction

August 25, 2026 – City Council Regular Meeting and Potential Action

Current Discussion:

Following last month's discussion with the PC, staff has prepared the attached draft code language based on Sumner's Municipal Code, with the following modifications:

- Eligible sites are limited to those that are within the TC zoning district and served by sanitary sewers, the MUR zoning district within 750 feet of an active public transit line, and the C zoning district within 750 feet of an active public transit line (i.e., Meridian Ave E / SR 161)
- Allowing for 8-year and 12-year exemptions, with the following restrictions:
 - 10-unit minimum
 - 50% permanent residential occupancy and tenant displacement is prohibited
 - Crosswalk safety improvements when existing or proposed public transit stop(s) are within 100 feet of the project
 - Relocating existing overhead utilities (abutting and on the frontage) to underground, except for high voltage transmission lines

- 12-year exemptions require at least 20% as affordable housing units to either low-income or moderate-income households
- *Notes to consider additional design elements for 12-year MFTE eligibility –*
 - Structured parking under / beneath other occupiable building space(s)
 - Developing more than the minimum residential density
 - Allowing for additional building height to achieve maximum density

Staff Recommendation:

Following tonight's conversation with the PC, and initial conversation with the Department of Commerce regarding items discussed tonight, staff recommends moving forward with scheduling a public hearing on this item as outlined in the Tentative Schedule, above. To allow adequate time for review and consideration of any public comments received, a formal recommendation by the PC to City Council may be considered at a subsequent PC meeting.

NEW Chapter 3.45

MULTIFAMILY PROPERTY TAX EXEMPTION

3.45.010 Purpose.

As provided for in chapter 84.14 RCW, the purpose of this chapter is to provide limited exemptions from ad valorem property taxation for multifamily housing in designated residential targeted areas to:

A. Encourage increased residential opportunities, including affordable housing units, within areas of the city designated by the city council as residential targeted areas; and/or

B. Stimulate new construction or rehabilitation of existing vacant and underutilized buildings for multifamily housing in designated residential targeted areas to increase and improve housing opportunities, including affordable housing; and

C. Assist in directing future population growth to designated residential targeted areas, thereby reducing development pressure on ~~single-family~~ lower-density residential neighborhoods and areas with restrictive critical areas; and

D. Achieve development densities which are more conducive to transit use in designated residential targeted areas.

3.45.020 Definitions.

When used in this chapter, the following terms shall have the following meanings, unless the context indicates otherwise:

A. "Affordable housing" means residential housing that is rented by a person or household whose monthly housing costs, including utilities other than telephone, do not exceed 30 percent of the household's monthly income. For the purposes of housing intended for owner occupancy, "affordable housing" means residential housing that is within the means of low- or moderate-income households.

B. "Building codes" means the city and state building and fire codes as set forth in ~~SE~~MC Title 15.

C. "City" means the city of Edgewood ~~Sumner~~.

D. "Department" means the ~~city department of~~ community development department.

E. "Director" means the community development director ~~of the department of community development~~, or designee.

F. "High-cost area" means a county where the third quarter median house price for the previous year as reported by the Washington Center for Real Estate Research at Washington State University is equal to or greater than 130 percent of the statewide median house price published during the same time period.

G. "Household" means a single person, family, or unrelated persons living together.

H. "Low-income household" means a single person, family, or unrelated persons living together whose adjusted income is at or below 80 percent of the median family income adjusted for family size, for the county where the project is located, as reported by the United States Department of Housing and Urban Development. For cities located in high-cost areas, "low-income household" means a household that has an income at or below 100 percent of the median family income, adjusted for family size, for the county where the project is located.

I. "Moderate-income household" means a single person, family, or unrelated persons living together whose adjusted income is more than 80 percent but is at or below 115 percent of the median family income adjusted for family size, for the county where the project is located, as reported by the United States Department of Housing and Urban Development. For cities located in high-cost areas, "moderate-income household" means a household that has an

income that is more than 100 percent, but at or below 150 percent, of the median family income adjusted for family size, for the county where the project is located.

J. "Multifamily housing" means a building having 10 or more dwelling units not designed or used as transient accommodations and not including hotels and motels. Multifamily units may result from new construction or rehabilitated or conversion of vacant, underutilized, or substandard buildings to multifamily housing.

K. "Multifamily property tax exemption" means an exemption from ad valorem property taxation for multifamily housing.

L. "Owner" means the property owner of record.

M. "Permanent residential occupancy" means multiunit housing that provides either rental or owner occupancy on a nontransient basis. This includes owner-occupied or rental accommodation that is leased for a period of at least one month. This excludes hotels and motels that predominantly offer rental accommodation on a daily or weekly basis.

N. "Rehabilitation improvements" means modifications to existing structures that are vacant for 12 months or longer that are made to achieve a condition of substantial compliance with existing building, fire, and zoning codes, or modification to existing occupied structures which increase the number of multifamily housing units.

O. "Residential targeted area," also "residential target area," means the geographic area located within the areas ~~set forth in Figures A and B~~ described in SEMC § 3.45.050(A).

P. "Substantial compliance" means compliance with all local building, fire and zoning code requirements, which are typically required for rehabilitation as opposed to new construction.

3.45.030 Applicability.

Multifamily housing projects in designated residential targeted areas resulting from new construction or rehabilitation or conversion of vacant, underutilized, or substandard buildings may be entitled to a limited exemption from ad valorem property taxation as set forth in this chapter.

3.45.040 Terms of the tax exemption.

A. Duration of Exemption. The value of new housing construction, conversion, and rehabilitation improvements qualifying under this chapter is exempt from ad valorem property taxation, as follows:

1. For properties for which applications for certificates of tax exemption eligibility are submitted under this chapter, the value is exempt:

a. For 8 successive years beginning January 1st of the year immediately following the calendar year of issuance of the certificate, if the property otherwise qualifies for the exemption under this chapter and is in the Mixed-Use Residential (MUR) zoning district.

b. For 12 successive years beginning January 1st of the year immediately following the calendar year of issuance of the certificate, if the property otherwise qualifies for the exemption under this chapter and meets the conditions in this subsection (A)(1)(ab). For the property to qualify for the 12-year exemption under this subsection, the applicant must commit to renting or selling at least 20 percent of the multifamily housing units as affordable housing units to low- and moderate-income households, and the property must satisfy that commitment and any additional affordability and income eligibility conditions adopted by the local government under this chapter. In the case of projects intended exclusively for owner occupancy, the minimum requirement of this subsection (A)(1)(ab) may be satisfied solely through housing affordable to moderate-income households. CONSIDER ADDING REQUIREMENT(S) FOR STRUCTURED PARKING, INCREASED DENSITY, OR ADDITIONAL BUILDING HEIGHT HERE?

B. Limits on Exemption. The exemption does not apply:

1. To the value of land or to the value of nonhousing-related improvements not qualifying under this chapter.

2. In the case of rehabilitation of existing buildings, to the value of improvements constructed prior to submission of the completed application required under this chapter.

3. To increases in assessed valuation made by the Pierce County assessor on nonqualifying portions of building or other improvements and value of land nor to increases made by lawful order of a county board of equalization, the Department of Revenue, or Pierce County, to a class of property throughout the county or specific area of the county to achieve the uniformity of assessment or appraisal required by law.

C. Conclusion of Exemption. At the conclusion of the exemption period, the new or rehabilitated housing cost shall be considered as new construction for the purposes of chapter 84.55 RCW.

3.45.050 Project eligibility.

A proposed multifamily housing project must meet the following requirements for consideration for a property tax exemption:

A. Location. The project must be located within one of the following~~a~~ residential targeted areas as defined in ~~SEMC~~ § 3.45~~52~~.020; ~~and as set forth in Figures A and B.~~

1. All parcels within the Town Center (TC) zoning district;

2. Parcels within the Mixed-Use Residential (MUR) zoning district within a 750-foot walking distance of an active public transit route; and

3. Parcels within the Commercial (C) zoning district within a 300-foot walking distance of an active public transit route.

B. Tenant Displacement Prohibited. The project must not displace existing residential tenants of structures that are proposed for redevelopment. If the property proposed to be rehabilitated is not vacant, an applicant shall provide each existing tenant housing of comparable size, quality, and price and a reasonable opportunity to relocate.

C. Noncompliance With Building Codes. Existing dwelling units proposed for rehabilitation must fail to comply with one or more standards of the applicable state or city building codes.

D. Size of Project. The new, converted, or rehabilitated multiple-unit housing must provide for a minimum of 50 percent of the space for permanent residential occupancy. The project, whether new, converted, or rehabilitated multiple-unit housing, must include at least 12 units of multifamily housing within a residential structure or as part of an urban development. In the case of existing multifamily housing that is occupied or which has not been vacant for 12 months or more, the multifamily housing project must also provide for a minimum of four additional multifamily units for a total project of at least 10 units including the four additional units. Existing multifamily housing that has been vacant for 12 months or more does not have to provide additional units.

E. Proposed Completion Date. New construction of multifamily housing and rehabilitation improvements must be completed within three years from the date of approval of the application.

F. Sanitary Sewer Connection. The project must connect or be connected to an available sanitary sewer system.

G. Overhead to Underground Utility Conversion. Except for high voltage transmission lines, the project must convert any and all existing abutting and fronting overhead utility lines to underground.

H. Transit Access and Safety Improvements. If an existing or proposed transit stop is within 100 feet of the project, a pedestrian crosswalk and associated safety improvements must be constructed by the owner consistent with the Meridian Corridor Study adopted under Resolution 24-0741.

I. Compliance With Guidelines and Standards. The project must be designed to comply with the city's comprehensive plan, building, housing, and zoning codes, and any other applicable regulations. The project must also comply with any other standards and guidelines adopted by the city council for the residential targeted area.

3.45.060 Application procedure.

A property owner who wishes to propose a project for a tax exemption shall complete the following procedures:

A. The application provided by the city shall be filed with the department along with the required fees as established pursuant to RCW 84.14.080.

B. A complete application shall include:

1. A completed city of Edgewood~~Sumner~~ application form setting forth the grounds for the exemption.

2. Preliminary floor and site plans of the proposed project.

3. A statement acknowledging the potential tax liability when the project ceases to be eligible under this chapter.

4. An affidavit stating the occupancy record of the property for a period of 12 months prior to filing the application.

5. Verification by oath or affirmation of the information submitted.

6. For rehabilitation projects, the applicant shall provide a report prepared by a registered architect identifying property noncompliance with the building codes. This report shall identify specific code violations and must include supporting data that satisfactorily explains and proves the presence of a violation. Supporting data must include a narrative and such graphic materials as needed to support this application. Graphic materials may include, but are not limited to, building plans, building details, and photographs.

3.45.070 Application for conditional certificate.

The director may certify as eligible an application which is determined to comply with the requirements of this chapter. A decision to approve or deny an application shall be made within 90 calendar days of receipt of a complete application.

A. Application. The director may approve the application if he/she finds that:

1. A minimum of 12 new units are being constructed or in the case of occupied rehabilitation or conversion within 12 months of occupancy, a minimum of four additional multifamily units for a total project of at least 10 units including the four additional multifamily units are being developed.

2. The proposed project is or will be, at the time of completion, in conformance with all applicable local plans and regulations.

3. The owner has complied with all standards and guidelines adopted by the city under this chapter.

4. The site is located in the residential targeted area.

5. If applicable, the proposed multiunit housing project meets the affordable housing requirements as described in SEMC § 3.~~5245~~.040.

B. Approval of Application. If an application is approved, the applicant shall enter into a contract with the city, regarding the terms and conditions of implementation of the project, and the director shall issue a conditional certificate of acceptance of tax exemption. The conditional certificate shall expire three years from the date of approval unless an extension is granted as provided in this chapter.

C. Denial of Application. If an application is denied, the director shall state in writing the reasons for denial and shall send notice to the applicant at the applicant's last known address within 10 calendar days of the denial.

D. Appeal. Per RCW 84.14.070, an applicant may appeal a denial to the city council within 30 calendar days of receipt of the denial by filing a complete appeal application and fee with the director. The appeal before the city

council will be based on the record made before the director. The director's decision will be upheld unless the applicant can show that there is no substantial evidence on the record to support the director's decision. The city council's decision on appeal will be final.

3.45.080 Extension of conditional certificate.

A. Extension. The conditional certificate and time for completion of the project may be extended by the director for a period not to exceed a total of 24 consecutive months. To obtain an extension, the applicant must submit a written request with a fee stating the grounds for the extension. An extension may be granted if the director determines that:

1. The anticipated failure to complete construction or rehabilitation within the required time period is due to circumstances beyond the control of the owner;

2. The owner has been acting and could reasonably be expected to continue to act in good faith and with due diligence; and

3. All the conditions of the original contract between the applicant and the city will be satisfied upon completion of the project.

B. Denial of Extension. If an extension is denied, the director shall state in writing the reason for denial and shall send notice to the applicant's last known address within 10 calendar days of the denial.

C. Appeal. Pursuant to RCW 84.14.090(6), an applicant may appeal the denial of an extension to the hearing examiner pursuant to ~~Chapter 18.4056 SEMC~~ within 14 calendar days of receipt of the denial by filing a complete appeal application and fee with the director. The appeal before the hearing examiner shall be processed as a Type ~~III-a director decision~~ Major Administrative Action pursuant to chapter 18.4056 SEMC. No appeal to the city council is provided from the hearing examiner's decision. The applicant may appeal the hearing examiner's decision to the Pierce County superior court, under RCW 34.05.510 through 34.05.598, if the appeal is filed within 30 calendar days of receiving notice of that decision.

3.45.090 Application for final certificate.

Upon completion of the improvements agreed upon in the contract between the applicant and the city and upon issuance of a certificate of occupancy, the applicant may request a final certificate of tax exemption by filing with the director the following:

A. A statement of expenditures made with respect to each multifamily housing unit and the total expenditures made with respect to the entire property;

B. A description of the completed work and a statement of qualification for the exemption;

C. A statement that the work was completed within the required three-year period or any authorized extension; and

D. If applicable, that the project meets the affordable housing requirements as described in RCW 84.14.020.

3.45.100 Issuance of final certificate.

Within 30 calendar days of receipt of all materials required for a final certificate, the director shall determine whether the specific improvements satisfy the requirements of the contract, application, and this chapter.

A. Granting of Final Certificate. If the director determines that the project has been completed in accordance with this chapter and the contract between the applicant and the city, and has been completed within the authorized time period, the city shall, within 10 calendar days of the expiration of the 30-day review period above, file a final certificate of tax exemption with the Pierce County assessor.

B. Denial of Final Certificate. The director shall notify the applicant in writing that a final certificate will not be filed if the director determines that:

1. The improvements were not completed within the authorized time period;

2. The improvements were not completed in accordance with the contract between the applicant and the city; or

3. The owner's property is otherwise not qualified under this chapter.

C. Appeal. Pursuant to RCW 84.14.090(6), an applicant may appeal a denial to the hearing examiner pursuant to ~~e~~Chapter 18.40~~56~~ ~~S~~EMC within 14 calendar days of issuance of the denial of a final certificate by filing a complete appeal application and fee with the director. The appeal before the hearing examiner shall be processed as a Type ~~III-a director decision~~ Major Administrative decision pursuant to ~~e~~Chapter 18.40~~56~~ ~~S~~EMC. No appeal to the city council is provided from the hearing examiner's decision. The applicant may appeal the hearing examiner's decision to the Pierce County superior court, under RCW 34.05.510 through 34.05.598, if the appeal is filed within 30 calendar days of receiving notice of that decision.

3.45.110 Annual compliance review.

A. Within 30 calendar days after the first anniversary of the date of filing the final certificate of tax exemption and each year for the tax exemption period, the property owner shall be required to file a notarized declaration with the director indicating the following:

1. A statement of occupancy and vacancy of the multifamily units during the previous 12 months;
2. A certification by the owner that the property has not changed use and, if applicable, that the property has been in compliance with the affordable housing requirements as described in RCW 84.14.020 since the date of the certificate approved by the city;
3. A description of changes or improvements constructed after issuance of the certificate of tax exemption; and
4. Any information needed by the city to file its report pursuant to subsection (B) of this section and any additional information requested by the city in regards to the units receiving a tax exemption.

B. The city shall report annually by December 31st of each year, beginning in 2026~~19~~, to the Washington State Department of Community, Trade, and Economic Development. The report must include the following information:

1. The number of tax exemption certificates granted;
2. The total number and type of units produced or to be produced;
3. The number and type of units produced or to be produced meeting affordable housing requirements;
4. The actual development cost of each unit produced;
5. The total monthly rent or total sale amount of each unit produced;
6. The income of each renter household at the time of initial occupancy and the income of each initial purchaser of owner-occupied units at the time of purchase for each of the units receiving a tax exemption and a summary of these figures for the city; and
7. The value of the tax exemption for each project receiving a tax exemption and the total value of tax exemptions granted.

C. City staff may also conduct on-site verification of the declaration. Failure to submit the annual declaration shall result in a review of the exemption per RCW 84.14.110.

3.45.120 Cancellation of tax exemption.

If the director determines the owner is not complying with the terms of the contract or this chapter, the tax exemption shall be canceled. This cancellation may occur in conjunction with the annual review or at any other time when noncompliance has been determined. If the owner intends to convert the multifamily housing to another use,

1 the owner shall notify the director and the Pierce County assessor in writing within 60 calendar days of the change
2 in use.

3 A. Effect of Cancellation. If a tax exemption is canceled due to a change in use or other noncompliance, the
4 following taxes and penalties will apply:

5 1. Additional real property tax, plus interest, shall be imposed based upon the value of the nonqualifying
6 improvements. This additional tax is calculated based upon the difference between the property tax paid and the
7 property tax that would have been paid if it had included the value of the nonqualifying improvements dated
8 back to the date that the improvements were converted to a nonqualifying use.

9 2. A penalty shall be imposed amounting to 20 percent of the value of the additional property tax plus interest.

10 3. The interest is calculated at the same statutory rate charged on delinquent property taxes from the dates on
11 which the additional property tax could have been paid without penalty if the improvements had been assessed
12 at full value without regard to this tax exemption program.

13 4. The additional taxes, interest and penalties will become a lien on the land and attach at the time the property
14 or portion of the property is removed from multifamily use or the amenities no longer meet applicable
15 requirements. The lien has priority over and must be fully paid and satisfied before a recognizance, mortgage,
16 judgment, debt, obligation, or responsibility to or with which the land may become charged or liable. The lien
17 may be foreclosed upon expiration of the same period after delinquency and in the same manner provided by
18 law for foreclosure of liens for delinquent real property taxes. An additional tax unpaid on its due date is
19 delinquent. From the date of delinquency until paid, interest must be charged at the same rate applied by law to
20 delinquent ad valorem property taxes.

21 B. Notice of Cancellation. Pursuant to RCW 84.14.110(2), upon determining that a tax exemption is to be canceled,
22 the director shall notify the owner by mail, return receipt requested.

23 C. Appeal. The property owner may appeal the determination of cancellation of the tax exemption to the hearing
24 examiner pursuant to ~~eChapter 18.4056 S~~EMC by filing a notice of appeal with the city clerk within 30 calendar
25 days, specifying the factual and legal basis for the appeal. The hearing examiner will conduct a hearing under
26 ~~eChapter 18.4056 SMC~~ for a Process II action. An aggrieved party may appeal the hearing examiner's decision to
27 the Pierce County superior court under RCW 34.05.510 through 34.05.598.

28 **3.45.130 Conflict of provisions.**

29 If any provision of this chapter is in legal conflict with the provisions of chapter 84.14 RCW, the provisions of
30 chapter 84.14 RCW shall apply as if set forth in this chapter.