



## CITY OF EDGEWOOD

### PLANNING COMMISSION MEETING AGENDA

Monday, August 10, 2026 – 6:00 PM ♦ City Hall –10440 Dom Calata Way E ♦ Edgewood, WA

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

Zoom Meeting ID: 970 6596 9184

**1. CALL TO ORDER**

**2. NOMINATIONS**

**a.** Chair/Vice Chair

**3. PUBLIC HEARINGS**

**a.** West Valley Highway Comprehensive Plan and Zoning Map Amendment (25-001-COMP PLAN)

**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 five minutes.*

**5. 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 July 13, 2026

**6. ACTION ITEMS**

**a.** Concurrency Code Updates

**b.** Multi-Family Tax Exemption (MFTE)

**7. DISCUSSION ITEMS**

**a.** West Valley Highway Comprehensive Plan and Zoning Map Amendment (25-001-COMP PLAN)

**b.** Schober Comprehensive Plan and Zoning Map Amendment (25-002-COMP PLAN)

**c.** Landscaping Standards Review and Updates

**8. STAFF/COMMISSIONER COMMENTS**

**9. 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 STAFF REPORT PLANNING COMMISSION AGENDA ITEM

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**Date:** August 10, 2026

**Title:** West Valley Comprehensive Plan and Zoning Map Amendment (25-001-COMP PLAN)

**Attachments:**

- A. Existing Future Land Use Designation Map
- B. Applicant Proposed Future Land Use Designation Map (Alternative 1)
- C. City Proposed Future Land Use Designation Map (Alternative 2)
- D. City Proposed Draft Limited Industrial Overlay Regulations
- E. 2025 West Valley Highway Final Land Use Study
- F. City of Sumner Sewer Capacity Analysis
- G. 2025 Public and Agency Comments
- H. Notice of Application Public Comments
- I. SEPA MDNS

**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 Edgewood City Council has established a process and criteria for making amendments to the City's Comprehensive Plan under [Edgewood Municipal Code \(EMC\) Chapter 18.60](#).

On February 24, 2026, the City Council approved the final annual docket under [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.

## **Background Information:**

In 2025, the City Council approved the preliminary comprehensive plan docket that included reviewing WVH overlay area zoning since it had been identified in the 2024 Comprehensive Plan as an area requiring further land use review. As part of this effort, the city hired SCJ Alliance to prepare the attached land use study for the WVH Overlay area. The intent of this study was to identify the most appropriate land



uses based on existing conditions and neighboring jurisdiction land uses. The study found that the study area is a strategic location near SR-167, that it is severely limited in its development potential by the lack of existing and planned non-vehicular and transit improvements, utility availability, and environmental constraints (wetlands, steep slopes, etc.).

In coordination with city staff, SCJ Alliance explored the following zoning scenarios that may better align with the study area reality:

- Scenario 1a: Rezone the WVH Overlay Area to Industrial
- Scenario 1b: Rezone the WVH Overlay Area to Business Park
- Scenario 2: Rezone the WVH Overlay Area to similar zoning as the adjacent jurisdictional zoning
- Scenario 3: No Action

Each scenario was analyzed for potential impacts to the transportation network, capital facilities, utilities, parks, and environmental features. Based on this analysis, SCJ Alliance report recommended that the city pursue a comprehensive rezone of the WVH Overlay Area to Industrial.

Rezoning the non-public properties to Industrial was selected primarily because it would generate relatively few vehicular trips, provide convenient access to SR-167, generally aligns with surrounding jurisdictions, supports the City's economic development goals, and offers greater adaptability to environmental constraints. However, transitioning from residential to industrial zoning may introduce displacement pressures and compatibility concerns with existing residences. These issues could be mitigated through the City's screening and buffering requirements. Any industrial development would be required to provide solid screening for adjacent residential properties and comply with Edgewood's noise and performance standards applicable to all businesses.

In late 2025, the city received agency comments from the Puyallup Tribe of Indians, Washington Department of Ecology, and Washington Department of Natural Resources that had a variety of environment concerns. These comments are provided in Attachment G. Staff did not have the availability to meet with these agencies and address the concerns before City Council would have to take action on the 2025 annual comprehensive plan amendment docket. As such, City Council removed the WVH Overlay rezone off the 2025 annual comprehensive plan amendment docket.

### **Process and Criteria:**

The process for amending the City's Comprehensive Plan is specified in [EMC Chapter 18.60](#), 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.

Alternatives 1 and 2 to amend the Comprehensive Plan Map and Zoning Map are both being analyzed by the City of Edgewood. These alternatives were analyzed under environmental review required by SEPA and are discussed here in detail as it relates to the criteria listed above.

### **Why the Amendments are Being Proposed:**

In accordance with [EMC 18.60.220](#), amendment cycles can occur no less frequently than every other year and no more than once per year. Under the 2025 annual amendment cycle, the City Council and Planning Commission provided opportunities for the public to propose amendments to the Comprehensive Plan. Under this docket item (25-001-COMP PLAN), the City of Edgewood is considering the Comprehensive Plan Map Amendment and corresponding Zoning Map updates to reflect the proposal described below.

### **Description of Proposal:**

The proposal is to change the Comprehensive Plan land use designation and zoning of the following Tax from Mixed Residential-1 (MR-1) to Industrial (I):

- |                          |                        |                     |
|--------------------------|------------------------|---------------------|
| • 0420111025             | • 0420141015           |                     |
| • 0420111002             | • 0420114046, 4047     |                     |
| • 0420114048, 4073, 4075 | • 0420115004, 5003     | • 0420113141        |
| • 4495400947             | • 4495400980           | • 0420118008        |
| • 4495400931             | • 0420111007           | • 0420114014        |
| • 4495400948             | • 0420111028           | • 0420114041        |
| • 0420114010             | • 0420111027           | • 0420114040        |
| • 0420114017             | • 4495400970, 962, 961 | • 0420024043        |
| • 0420114007             | • 0420111003           | • 0420024039        |
| • 4495400941             | • 0420114035           | • 4495400932        |
| • 4495400950             | • 0420118003           | • 0420114077        |
| • 0420118002             | • 0420114063           | • 0420021009        |
| • 0420118001             | • 0420114065           | • 0420021064, 1004, |
| • 4495400917             | • 0420114004           | 1020, 2035          |

- 4495400891
- 0420114034
- 4495400952
- 4495400951
- 0420024003
- 0420111026
- 0420021022
- 0420021027
- 0420021059
- 0420021058
- 0420114081
- 0420114080
- 0420114001
- 4495400881
- 0420024055
- 0420024056
- 0420114022
- 4495400949
- 0420024003

After reviewing the public comments received to-date, city staff determined that an alternative proposal may be warranted to limit the types of allowed industrial land uses. As such, the docket item now includes the following alternatives:

- 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. (Attachment B).
- Alternative 2: Same as Alternative 1, with a new Limited Industrial (LI) Overlay (Attachment C and D).

#### **Public & Agency Comment:**

Public comments were received during the notice of application which are located [here](#). The agency comments provided in 2025 are located [here](#). 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.

Another comment period associated with the SEPA determination issuance and tonight's Public Hearing is currently underway. A Notice of Public Hearing was published on July 26, 2026, being 15 days prior to tonight's hearing before the Planning Commission. No comments were received before August 6, 2026.

#### **SEPA Environmental Review:**

Public and agency comments were considered during the environmental review and addressed in the SEPA analysis of the proposed amendments and alternatives, contained in the SEPA checklist. The City of Edgewood issued a (Mitigated) Determination of Non-Significance on July 26, 2026, with a 14-day comment period (Exhibit I).

The following are the associated mitigation measures:

1. A 100-foot-minimum 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.
2. Future industrial development proposed within 500 feet of residential 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. Additional conditions, such as noise reduction walls, landscape buffers, and building orientation may be applied during project-level design review to mitigate noise and visual impacts on adjacent residential properties.
3. Type IV, 25-foot-width Solid Barrier landscaping is required between proposed industrial uses and any existing, adjacent residential uses.
4. All future construction activities shall implement temporary noise and dust control measures to minimize impacts on adjacent residential properties. These measures shall include, but are not limited to:
  - Limiting construction hours to the City's allowable work hours.
  - Employing dust suppression methods, such as water spraying and soil stabilization.
  - Utilizing noise-reducing equipment and techniques where feasible
  - Installing temporary barriers or screening to reduce dust and noise dispersion.
  - A Construction Mitigation Plan detailing these measures shall be submitted to the City prior to issuance of grading or building permits to the satisfaction of the Public Works Director.
5. Prior to issuance of building permits or change to commercial or industrial land uses, 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.

**Comprehensive Plan Amendments Criteria (EMC 18.60.220):**

The Planning Commission shall review all proposed amendments to the comprehensive plan against the following criteria:

1. Whether the proposed amendment(s) conform to the Growth Management Act ([Chapter 36.70A RCW](#)).

City Findings: The proposed amendments are consistent with the requirements of the Growth Management Act. The proposal was evaluated against the City's housing projections and found to have minimal impact on overall housing capacity due to significant limitations in utility infrastructure and environmental constraints within the WVH study area. The Comprehensive Plan currently identifies a surplus of 1,467 low-density dwelling units. The environmental constraints limit the area's residential development potential. As a result, the City can reduce its low-density housing capacity while still meeting its housing targets. Conversely, the proposed amendments would increase overall job capacity, enhancing the City's ability to meet employment growth targets — a longstanding challenge for Edgewood.

Regarding critical areas, the WVH study area contains fish-bearing and non-fish-bearing streams, wetlands, potential landslide hazard areas, and volcanic hazard zones. Any future development will be required to comply with the City's Critical Areas Ordinance and must demonstrate "no net loss of ecological function" for these sensitive areas.

The proposal has also been reviewed for consistency with the City's Capital Facility Plan, Transportation Improvement Plan, and General Sewer Plan.

2. 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.

City Findings: The proposed amendment alternatives are consistent with and implement the City's Comprehensive Plan. The redesignation of the subject properties, which are currently identified as a special land use study area within the plan, supports the City's economic development objectives. The proposal does not adversely affect any of the analyses or projections contained in the Comprehensive Plan or its associated documents, including the Capital Facilities Plan, Transportation Improvement Plan, and General Sewer Plan.

The proposed amendment alternatives support and are consistent with the following 2024 Comprehensive Plan goals and policies:

Policy NA.1k: Require measures to minimize excessive noise and light emitted from commercial land uses, industrial land uses, and other sources.

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

Policy 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.

Policy 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).

Policy 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.

Policy 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.

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

Policy 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.

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;

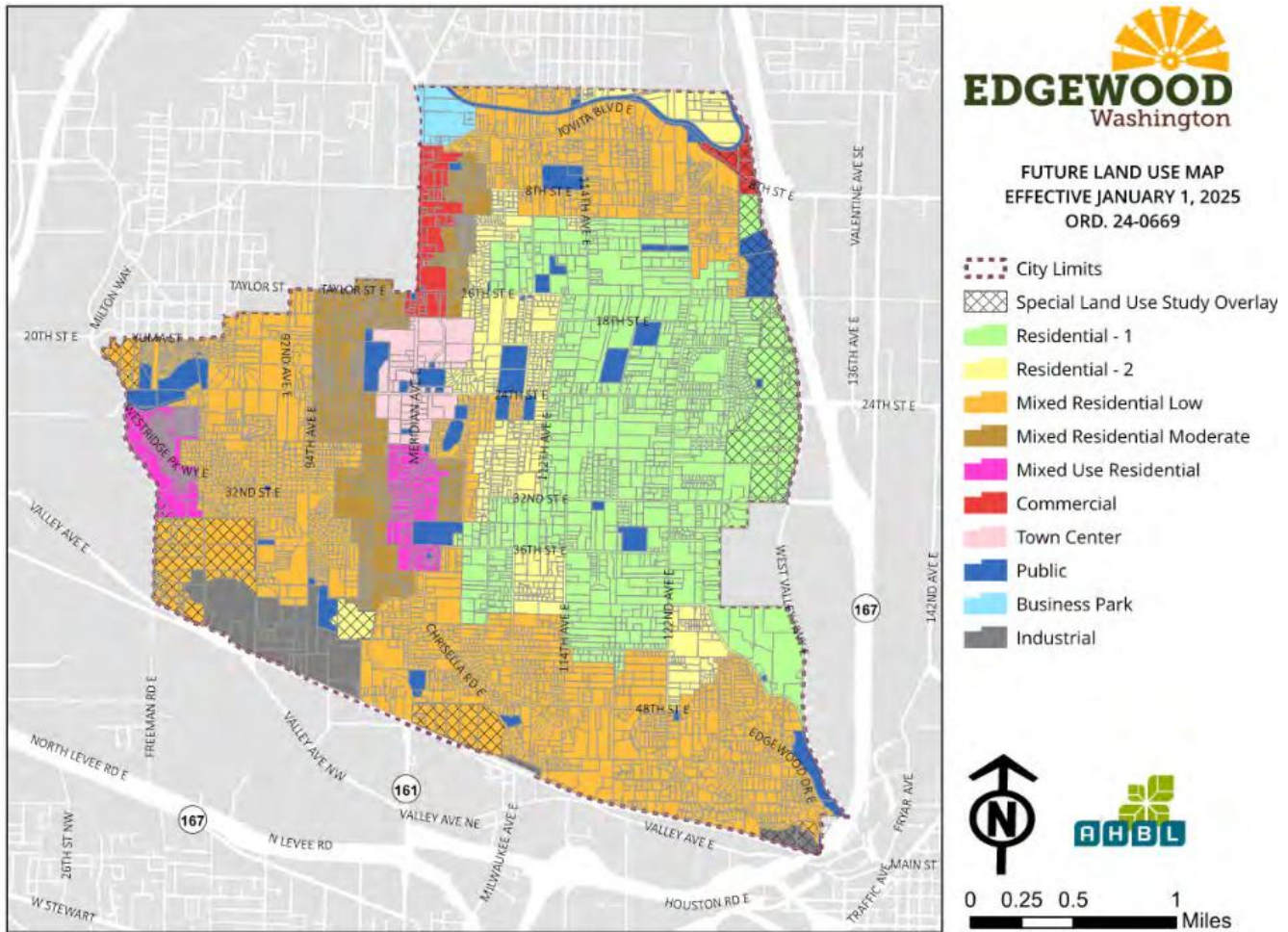
City Findings: The subject sites were identified in the 2024 Comprehensive Plan under Land Use Goal 1.b and identified on the Future Land Use Map with a "Special Land Use Study Overlay". This goal, along with its supporting land use analysis and relevant mapping, is provided below for context.

Policy LU.1.b: 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 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 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.*



2024 Comprehensive Plan Figure 3:



Since the WVH overlay area was identified for future redesignation of land uses, the Comprehensive Plan assumed that the properties within the “special land use study overlay” may require a redesignation of land uses. The proposed amendments are consistent with this criterion.

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

City Findings: As outlined in Criterion 3, the WVH study area was identified in the Comprehensive Plan as a candidate for potential redesignation pending further analysis. Since the completion of the WVH Land Use Study, new information has emerged that was not available during the last periodic update of the Comprehensive Plan. Based on this updated data, the proposed amendments are consistent with the intent and requirements of this criterion.



5. Whether the proposed amendment(s) reflects current, widely held values of the residents of the city.

City Response: The proposed amendment alternatives reflect the widely held values of Edgewood residents as documented in the 2024 Comprehensive Plan. Specifically, the plan identified this area for future land use study, signifying that existing commercial or residential uses may not be optimal. Furthermore, the WVH overlay has been significantly impacted by historical, adjacent industrial uses and SR 167 noise, meaning the area may be better suited for industrial development than residential development. However, Alternative 2, which restricts certain industrial land uses, is likely to be more compatible with the nearby established residential neighborhood than Alternative 1.

**Staff Recommendation:**

Staff recommends that if the Planning Commission chooses to recommend the rezone of the West Valley Highway Study Area to City Council, it select Alternative 2, which rezones the area from Residential and Commercial to Industrial (I) with the proposed Limited Industrial Overlay. The overlay regulations, together with existing code requirements, will address the neighbors' concerns regarding light, noise, traffic, and safety.

**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 Discussion*

**August 10, 2026 – Planning Commission Public Hearing**

September 14, 2026 – Planning Commission Recommendation

October 6, 2026 – City Council Study Session Introduction

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

**Public Hearing:**

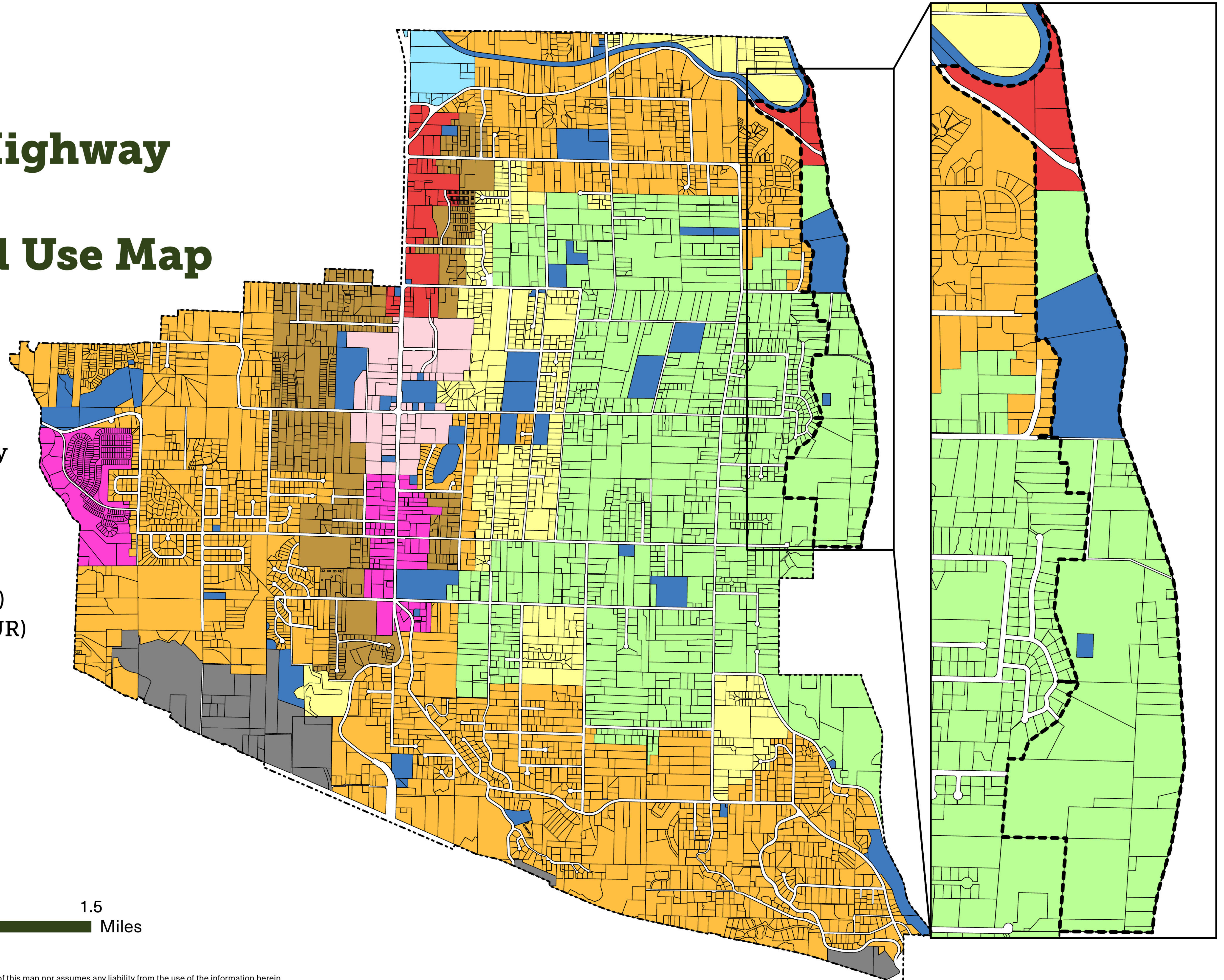
This is the Planning Commission Public Hearing for West Valley Highway Comprehensive Plan Amendment and Rezone (25-001-COMP PLAN) draft amendments. Staff will provide a brief presentation on the amendments. After the presentation, the public may submit written or oral testimony to the Planning Commission.



# West Valley Highway Study Area Existing Land Use Map

## Legend

- West Valley Highway Study
- 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)

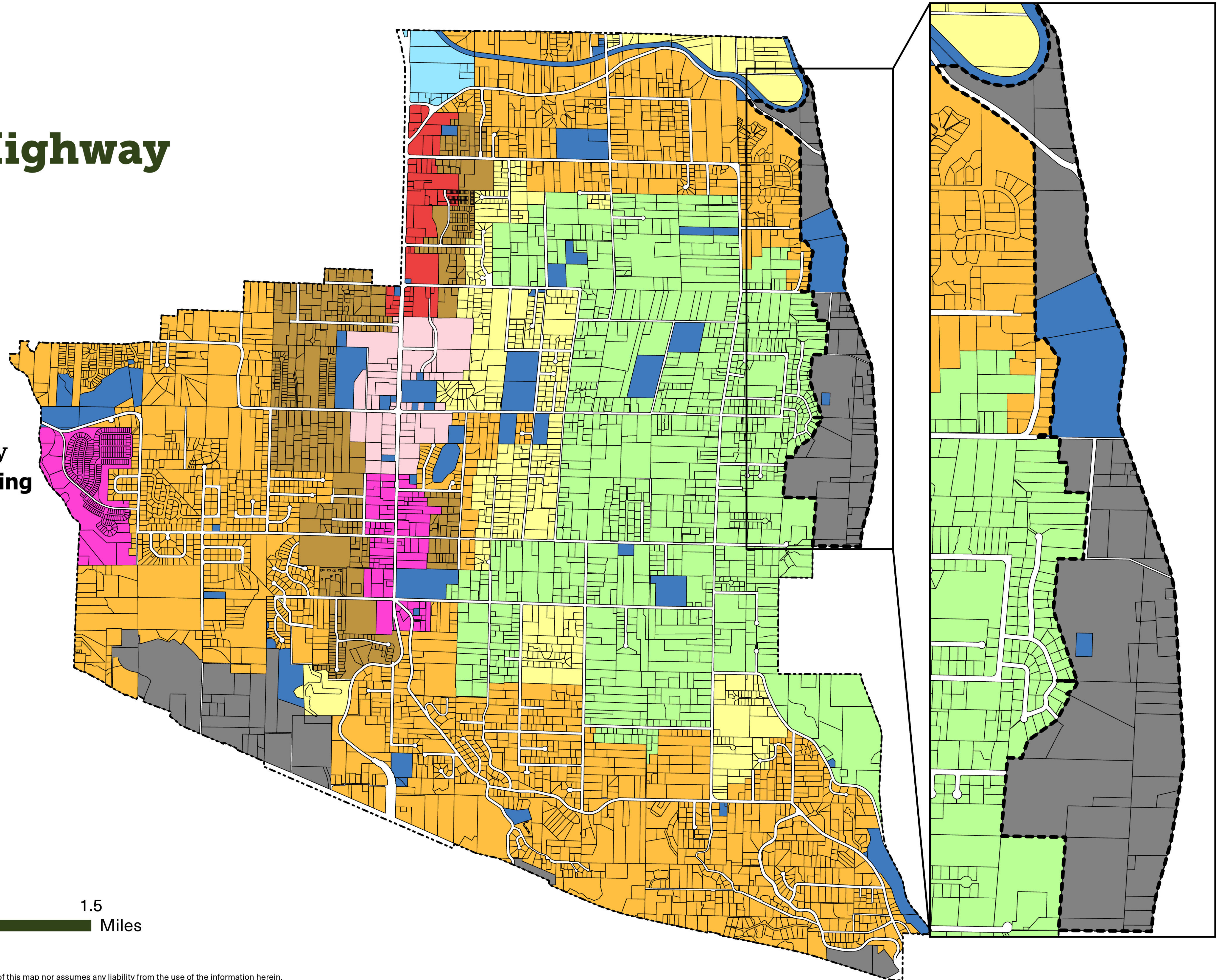




# West Valley Highway Study Area Alternative 1

## Legend

- West Valley Highway Study  
**Alternative 1 Proposed Zoning**
- Public (P)
- Industrial (I)





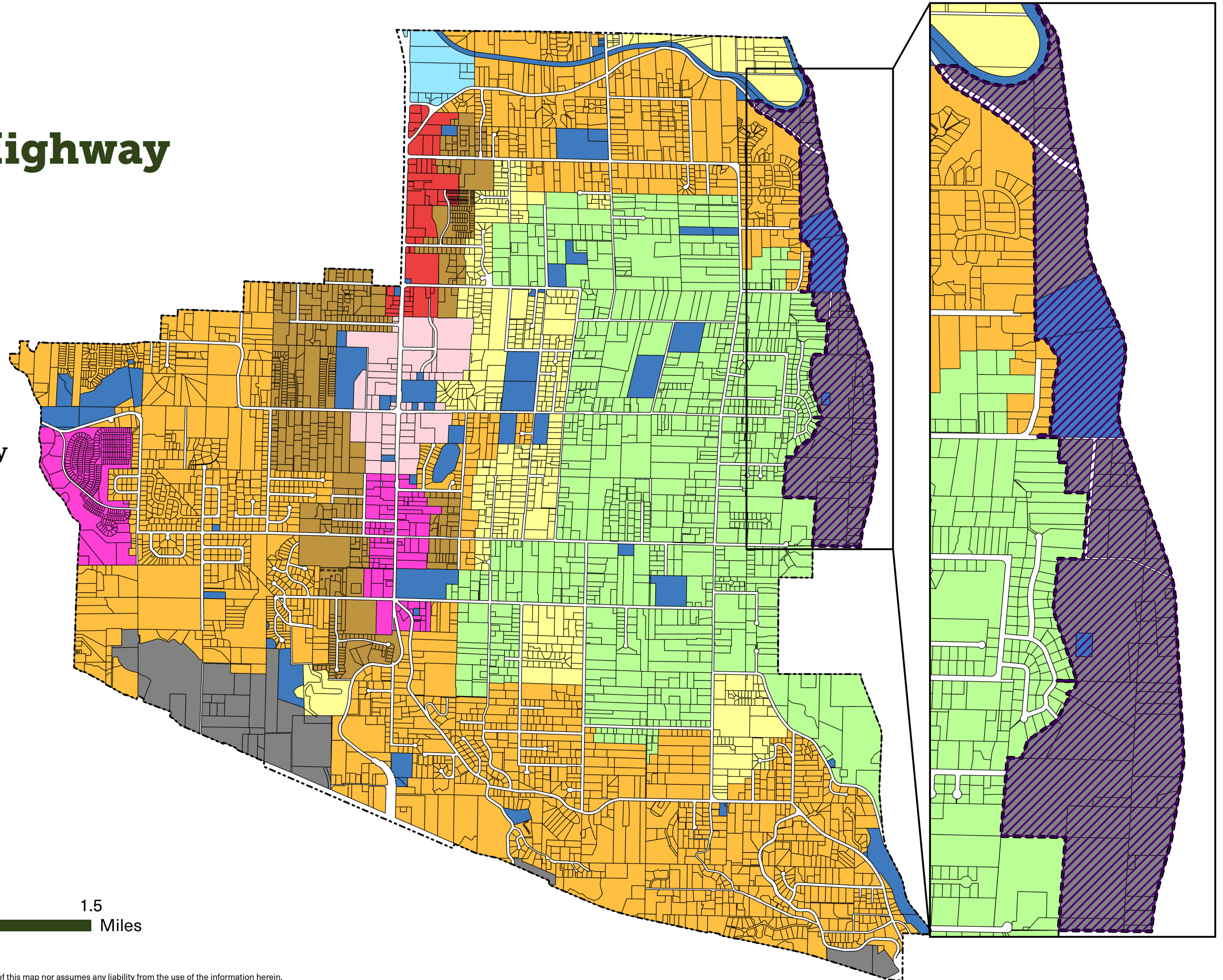
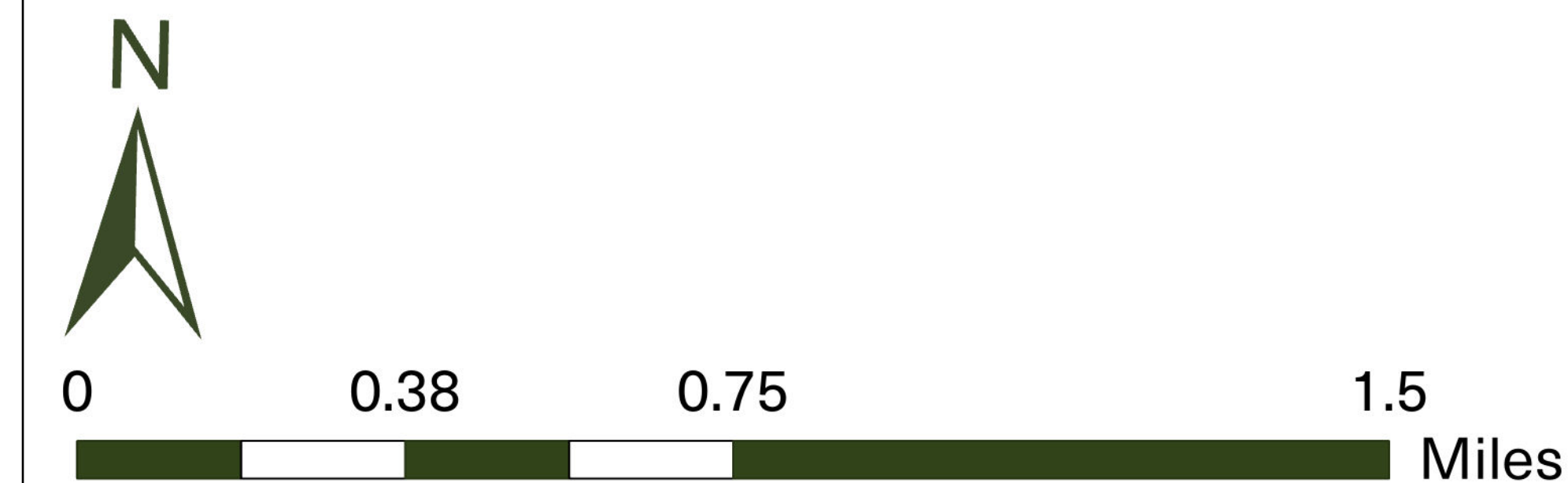
# West Valley Highway Study Area Alternative 2

## Legend

West Valley Highway Study

### Propozed Zoning

- Public (P)
- Industrial (I)
- Light Industrial Overlay





**NEW EMC 18.80.105**

**LIMITED INDUSTRIAL OVERLAY**

A. The limited Industrial (LI) Overlay provides limited industrial uses that are complementary and not detrimental to neighboring residential districts. The LI overlay is limited to areas with long established residential districts and sensitive areas that require additional protection.

B. Applicability. The LI overlay shall be applied to areas specifically designated on the official zoning map.

B. Permitted Uses. For permitted uses within the LI overlay see Chapter 18.70 EMC, Permitted Land Uses, under Industrial (I) zoning district except as provided below or in subsection C and D.

1. The following uses are permitted in the LI overlay:

a. Work/Live (EMC 18.20.260)

b. Parking Lots (NAICS 812930)

C. Conditional Uses.

1. The following uses are conditionally permitted:

a. Manufacturing, light (NAICS 23, part; 311 except 3116; 312; 313; 314; 315; 316; 337)

b. Warehousing and Storage, All other up to 50,000 sq. ft.

D. Prohibited Uses.

1. The following uses are prohibited in the LI overlay.

a. Cattle Feedlots (NAICS 112112)

b. Animal Production and Aquaculture, All Other (NAICS 112 except 112210; 112112; 112511, part)

c. Wind Electric Power Generation (NAICS 221115)

d. Manufacturing, Heavy (NAICS 23, part; 321; 322; 323; 324; 325; 326; 327; 331; 332; 333; 334; 335; 336; 339)

e. Gasoline Stations (NAICS 447)

f. Alternative Fueling Stations (EMC 18.20.040)

g. Fuel Dealers (454310)

h. Sexually Oriented Retail Business (EMC 18.20.220)

i. Warehousing and Storage, All Others 50,0001 sq. ft. and greater

j. Waste Management and Remediation Services, All Other (NAICS 5622, part 5629)

k. Sexually Oriented Entertainment (EMC 18.20.220)

l. Gambling Industries (NAICS 7132)

1 m. Crematoria (NAICS 812220, part)

2 E. Development Standards. The requirements of EMC 18.80.100.C shall apply to the LI overlay, except as provided  
3 or altered in this subsection,

4 1. Noise Impact Assessment. Each development or change of land use proposed within 500 feet of residentially  
5 zoned property shall be required to submit a project-specific Community Noise Impact Assessment  
6 demonstrating compliance with Edgewood Municipal Code (EMC) Chapter 8.20. The Director may waive this  
7 if the proposed land use is of less intensity than a previously approved land use.

8 2. Design Review shall be applicable to all projects within the LI overlay as determined by EMC 18.95.020.

9 3. Significant tree identification and preservation and/or replacement shall be required as set forth in EMC  
10 18.90.180, Tree preservation. However, no significant healthy trees shall be removed from required natural  
11 vegetated buffers.

12 4. Landscaping. The requirements of EMC § 18.90.090 shall apply to the LI overlay, except for the landscape  
13 buffers provided or altered in this subsection.

14 a. The project shall provide a minimum 100-foot natural vegetated buffer when the subject property  
15 directly abuts a residential and/or mixed-residential zoning district. This buffer shall remain natural but  
16 may be enhanced with additional plantings. This standard doesn't apply if the zoning districts are divided  
17 by a public roadway.

18 b. Type IV, 25-foot Solid Barrier landscaping is required between proposed industrial uses and any  
19 existing, adjacent residential uses.

20 c. Type IV, 15-foot Solid Barrier landscaping is required between proposed industrial uses and non-arterial  
21 roadways, public or private.



# 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

Prepared by: Zoë Tapert, Planner  
Spencer Easton, Project Manager  
SCJ Alliance  
8730 Tallon Lane NE, Suite 200  
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scjalliance.com

Contact: Spencer Easton, Project Manager  
spencer.easton@scjalliance.com

Project Reference: SCJ #25-000102







# Table of Contents

|          |                                             |            |
|----------|---------------------------------------------|------------|
| <b>1</b> | <b>Introduction .....</b>                   | <b>1</b>   |
| 1.1      | Study Background.....                       | 1          |
| <b>2</b> | <b>Study Area Existing Conditions .....</b> | <b>3</b>   |
| 2.1      | Current Zoning and Land Uses .....          | 3          |
| 2.1.1    | Current Zoning .....                        | 3          |
| 2.1.2    | Current Permitted Land Uses.....            | 6          |
| 2.1.3    | Neighbor City Zoning Designations:.....     | 7          |
| 2.2      | Summary of Existing Conditions.....         | 9          |
| 2.2.1    | Transportation Network .....                | 9          |
| 2.2.2    | Utility Availability .....                  | 11         |
| 2.2.3    | Environmental Considerations.....           | 13         |
| 2.2.4    | Potential Development Limitations .....     | 17         |
| <b>3</b> | <b>Future Zoning Scenarios .....</b>        | <b>19</b>  |
| 3.1      | Scenario 1a: Rezone to Industrial.....      | 19         |
| 3.1.1    | Zoning Categories and Allowed Uses.....     | 21         |
| 3.1.2    | Analysis of Impacts .....                   | 21         |
| 3.2      | Scenario 1b: Rezone to Business Park.....   | 23         |
| 3.2.1    | Zoning Categories and Allowed Uses.....     | 25         |
| 3.2.2    | Analysis of Impacts .....                   | 25         |
| 3.3      | Scenario 2: Similar to Adjacent Zoning..... | 27         |
| 3.3.1    | Zoning Categories and Allowed Uses.....     | 29         |
| 3.3.2    | Analysis of Impacts .....                   | 30         |
| 3.4      | Scenario 3: No Action .....                 | 32         |
| 3.4.1    | Zoning Categories and Allowed Uses.....     | 32         |
| 3.4.2    | Analysis of Impacts .....                   | 33         |
| <b>4</b> | <b>Recommendation .....</b>                 | <b>35</b>  |
|          | <b>Appendix A. Permitted Use Table.....</b> | <b>A-1</b> |



## List of Tables

|                                                                              |     |
|------------------------------------------------------------------------------|-----|
| Table 1: Edgewood Residential 1, Commercial, and Public Permitted Uses ..... | A-1 |
|------------------------------------------------------------------------------|-----|

## List of Figures

|                                                                              |    |
|------------------------------------------------------------------------------|----|
| Figure 1 West Valley Highway Overlay Area .....                              | 2  |
| Figure 2 West Valley Highway Overlay Area Zoning .....                       | 4  |
| Figure 3 West Valley Highway Overlay Area Future Land Use Designations ..... | 5  |
| Figure 4 Transportation Facilities .....                                     | 10 |
| Figure 5 Utility Service Providers .....                                     | 12 |
| Figure 6 Critical Areas Map .....                                            | 14 |
| Figure 7 Soil Types .....                                                    | 16 |
| Figure 8 Development Limitations .....                                       | 18 |
| Figure 9 Scenario 1a: Rezone to Industrial .....                             | 20 |
| Figure 10 Scenario 1b: Rezone to Business Park .....                         | 24 |
| Figure 11 Scenario 2: Rezone to Adjacent Jurisdiction Zoning .....           | 28 |

## List of Appendices

|                                 |
|---------------------------------|
| 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).

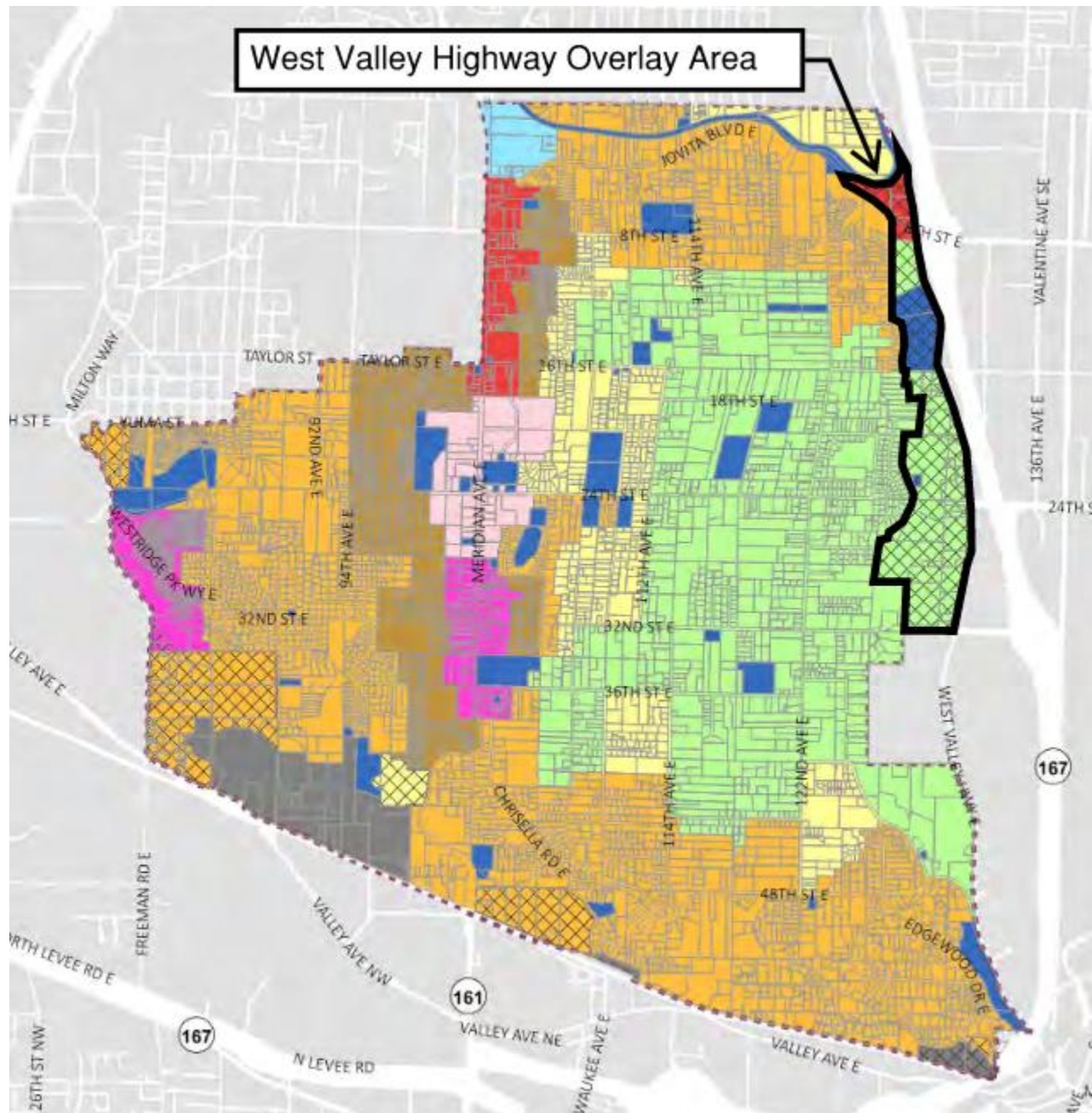
Pursuant to EMC 18.60.220, any future Comprehensive Plan Amendment must demonstrate that proposed changes meet concurrency requirements for transportation and do not adversely impact the level of service for public facilities and services. Amendments must also avoid unmitigated significant adverse impacts 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.



### Figure 1 West Valley Highway Overlay Area



This location has been prioritized for evaluation based on its existing land use patterns, infrastructure, and environmental context. Goal LU.1 in the Land Use Element of the Comprehensive Plan is to “Establish a future land use pattern that is consistent with the City’s vision.” Supporting policies to Goal LU.1 that are relevant to this Land Use Study include:

- 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.
  - *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. 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.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

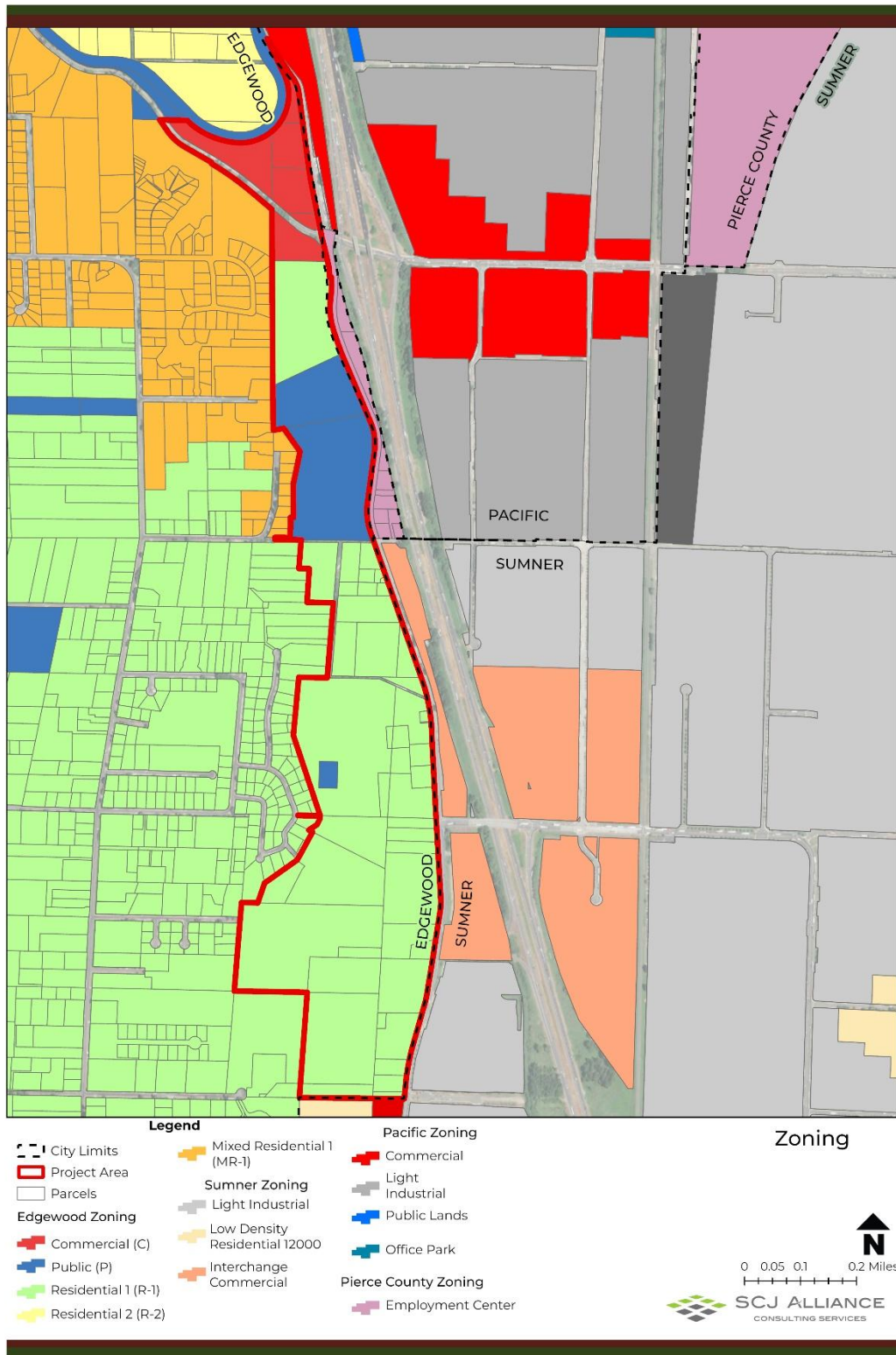
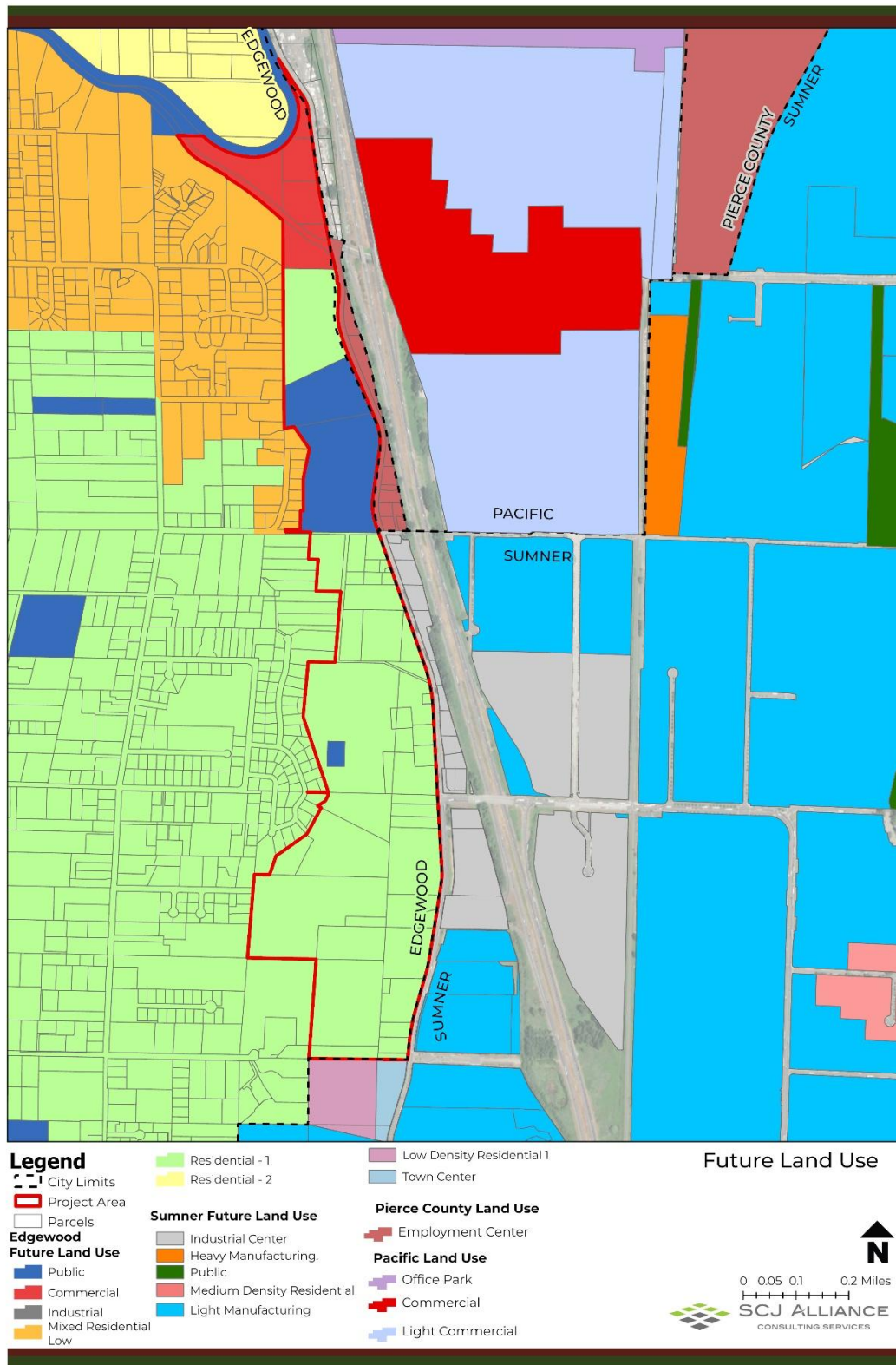




Figure 3 West Valley Highway Overlay Area Future Land Use Designations





## 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**

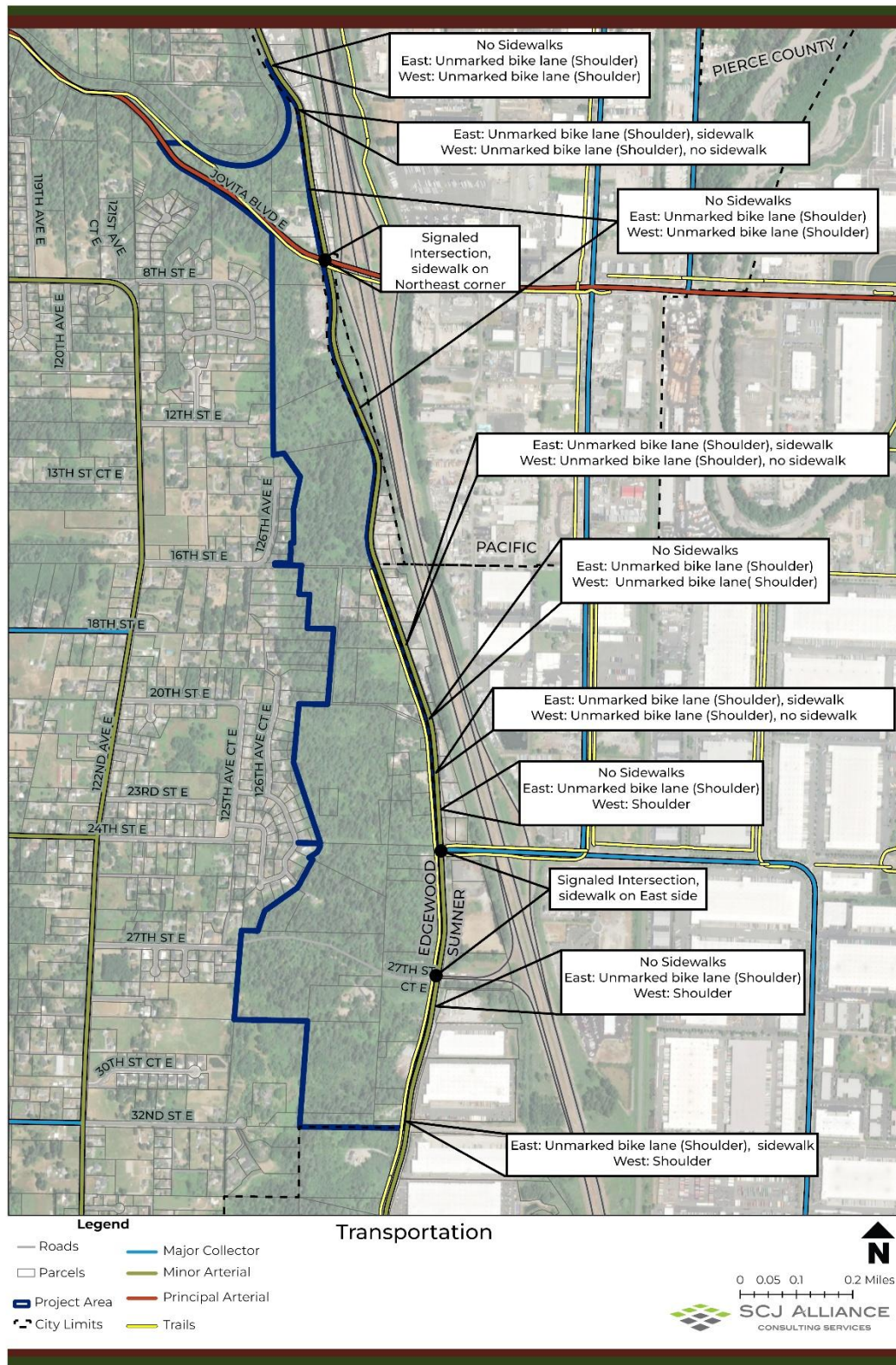
This section reviews key components of the existing transportation network, utility service availability, and critical areas within the study area, all of which play a crucial role in shaping land use feasibility and guiding future investment. By identifying existing deficiencies or limitations this 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 126<sup>th</sup> 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.

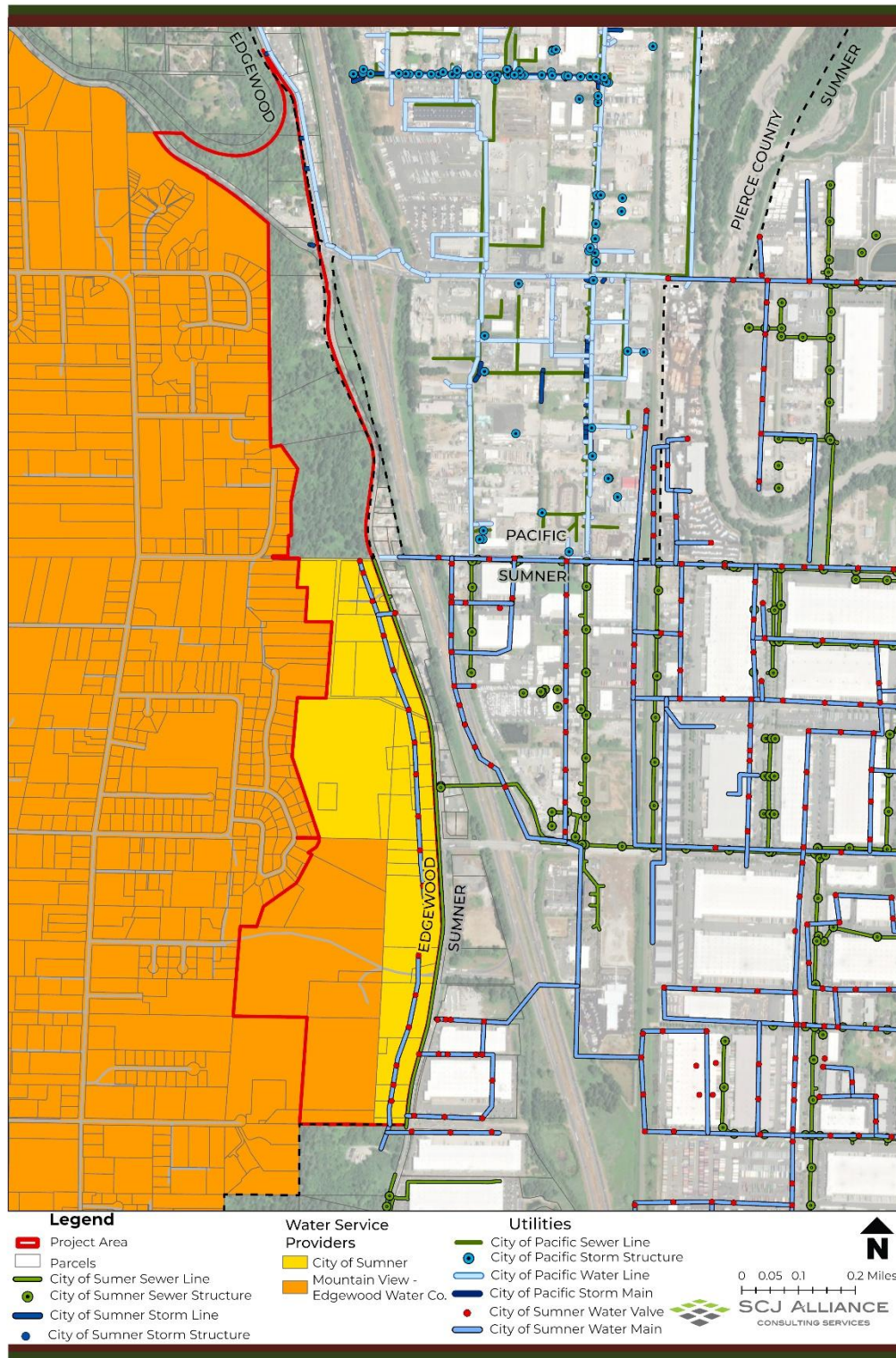
Areas designated for higher-density development, such as those within the Mixed Residential 1 (MR-1) and Commercial zoning districts, may require infrastructure extensions or capacity upgrades to support their intended intensity of use. For instance, redevelopment or infill within the Commercial zone, 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

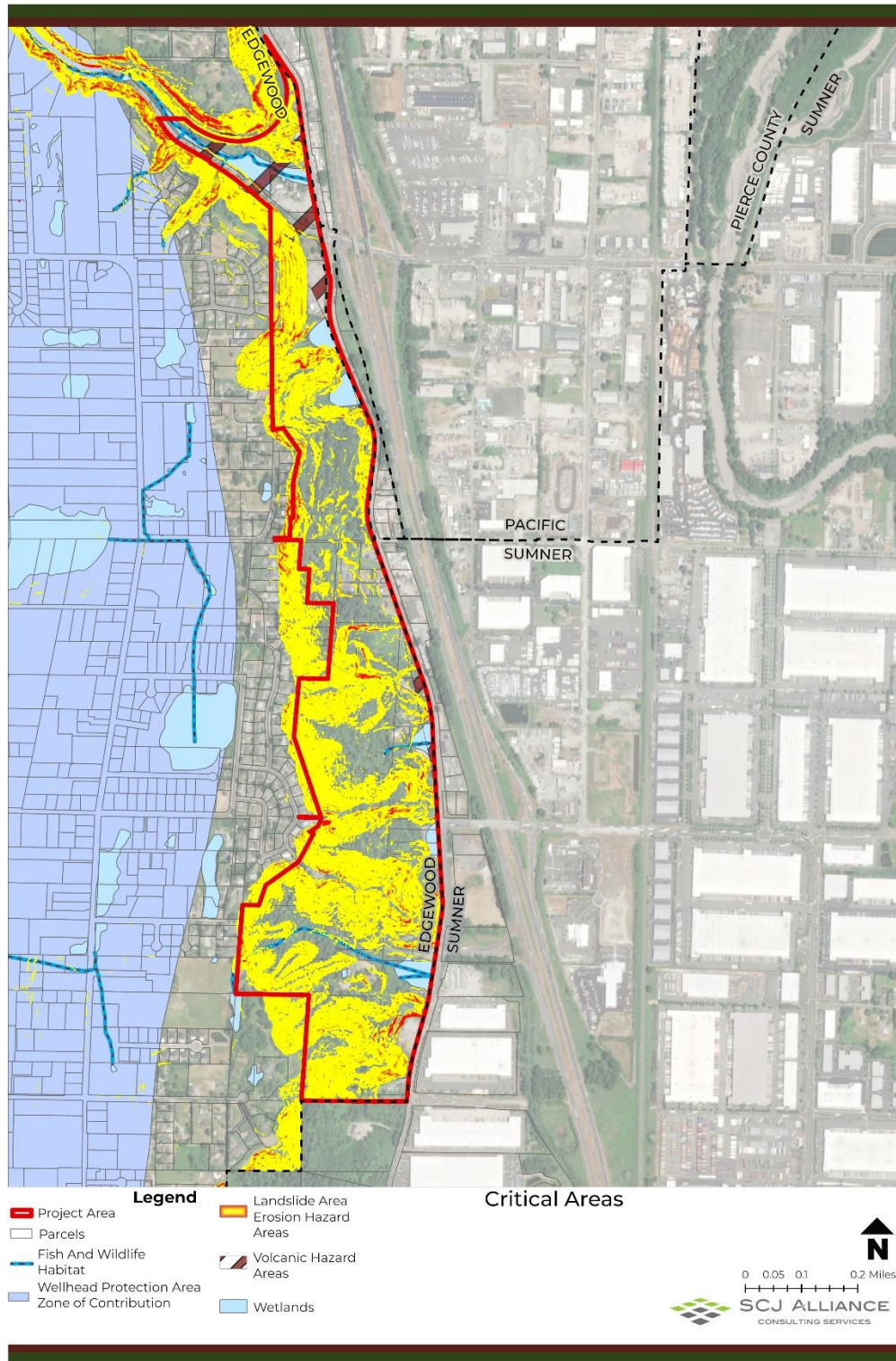


### 2.2.3 Environmental Considerations

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.



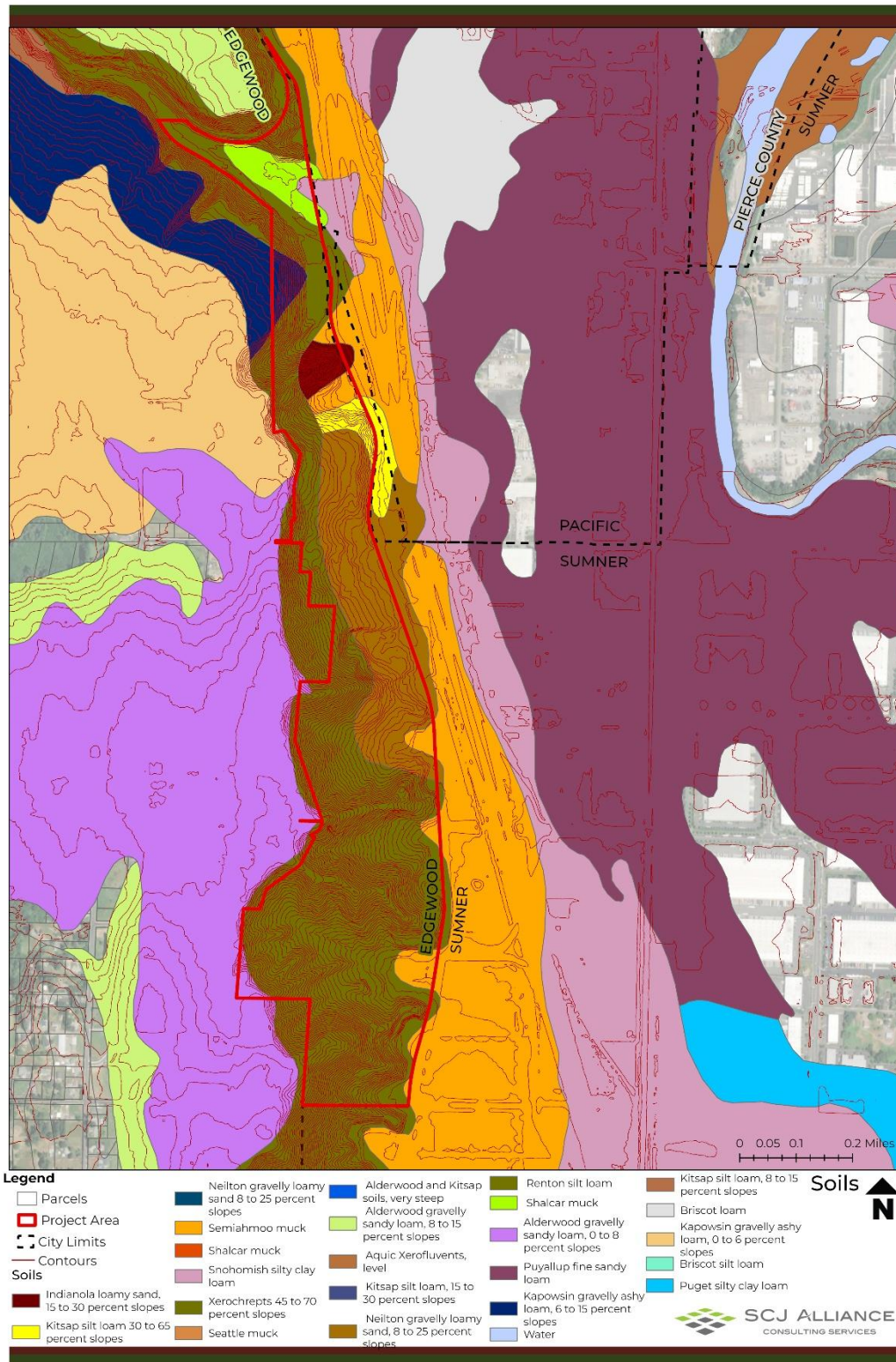
Figure 6 Critical Areas Map



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



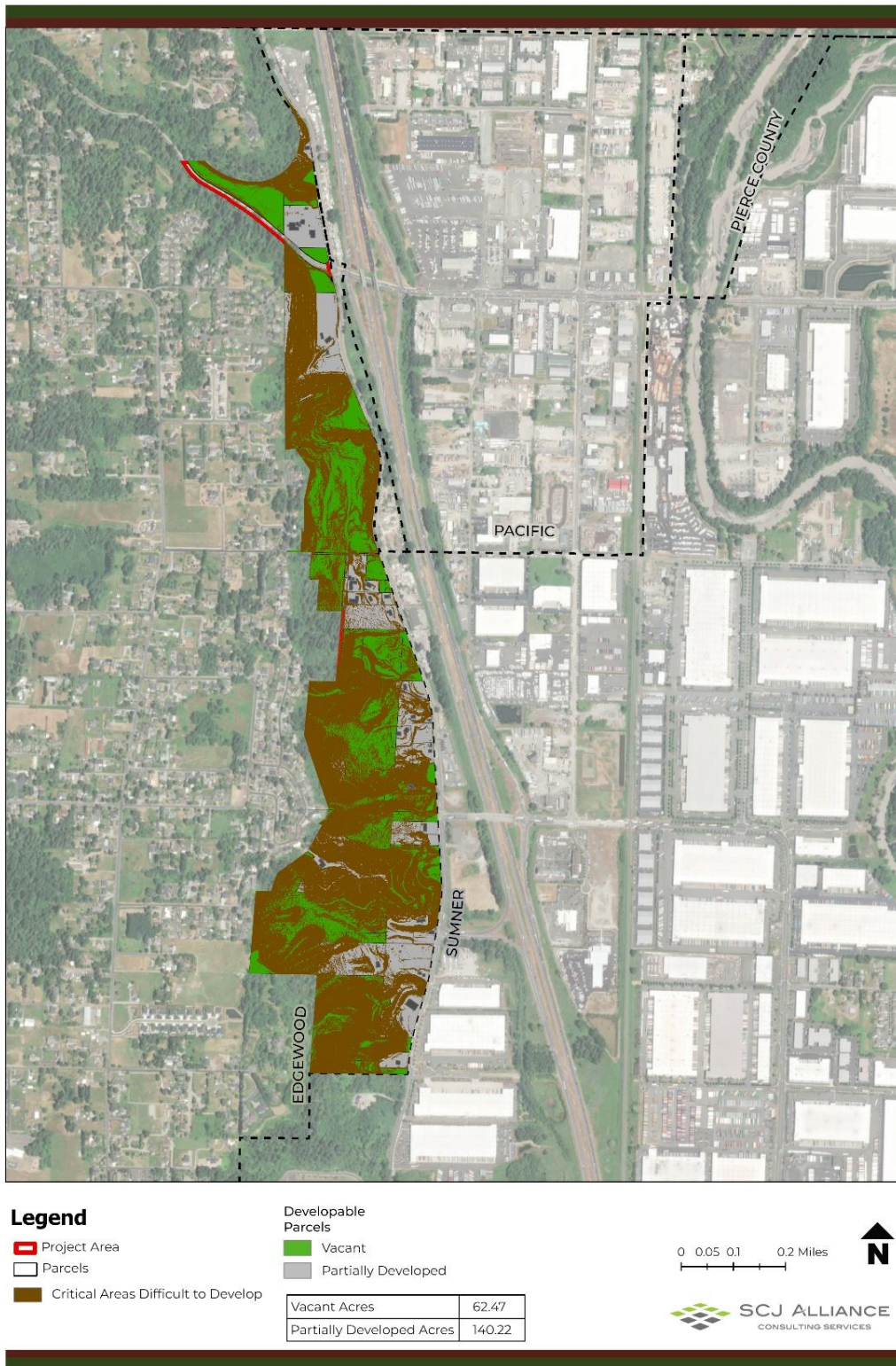
As a result, site-specific environmental constraints, including buffer requirements, stormwater management, and mitigation standards, will play a significant role in determining the feasibility of future development of this area.

#### **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.

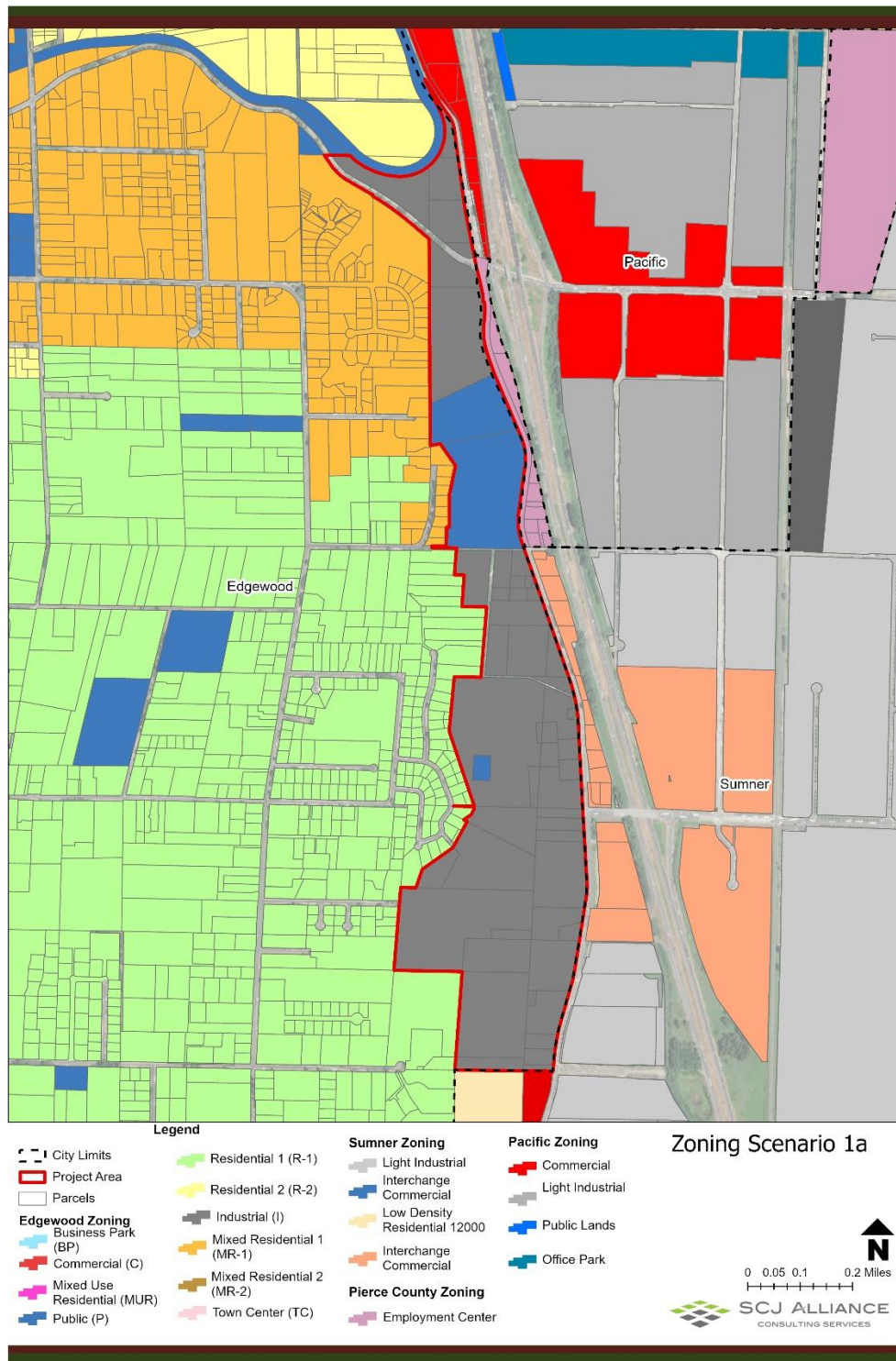
#### 3.1 Scenario 1a: Rezone to Industrial

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.

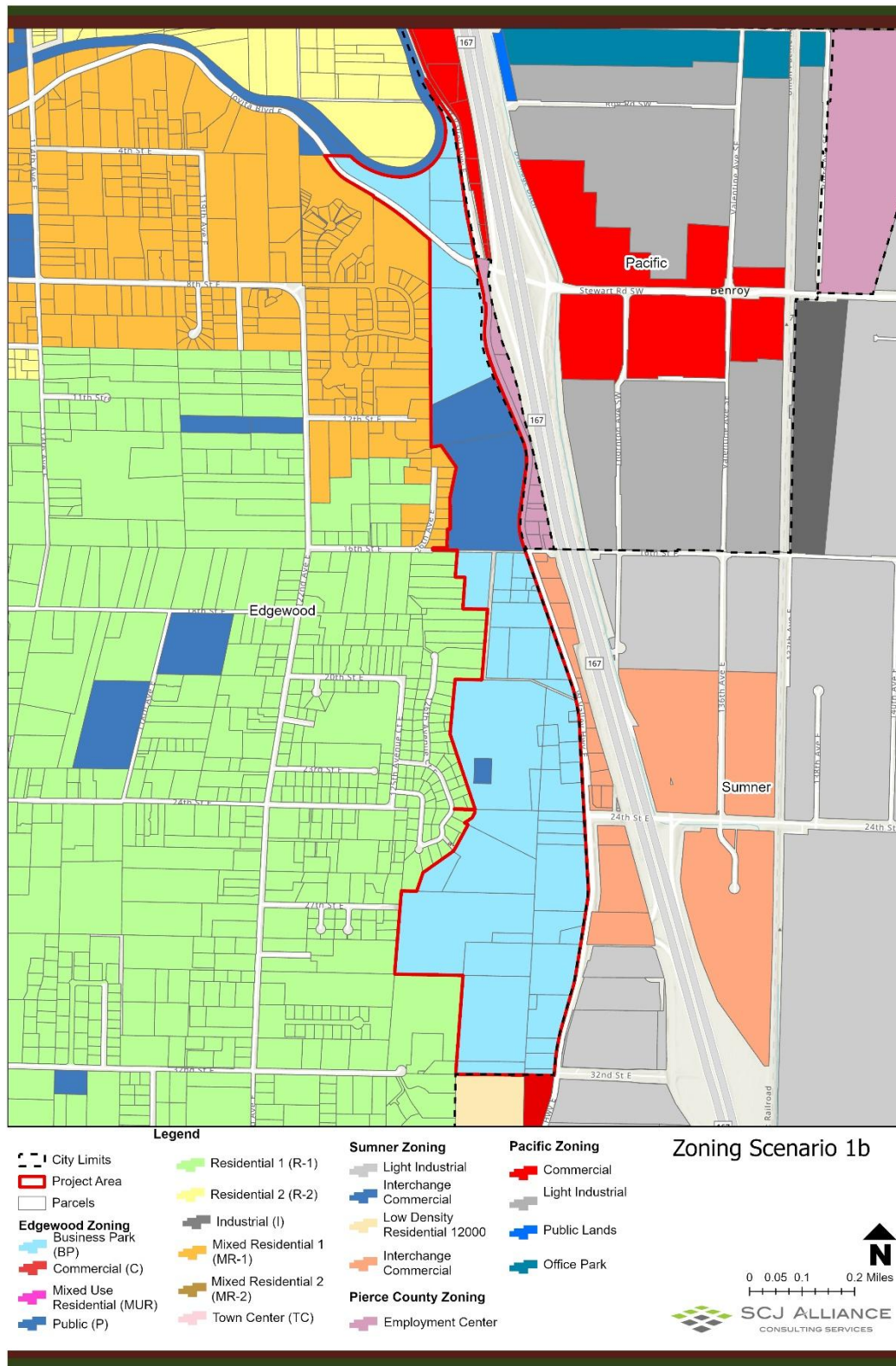
## **3.2 Scenario 1b: Rezone to Business Park**

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

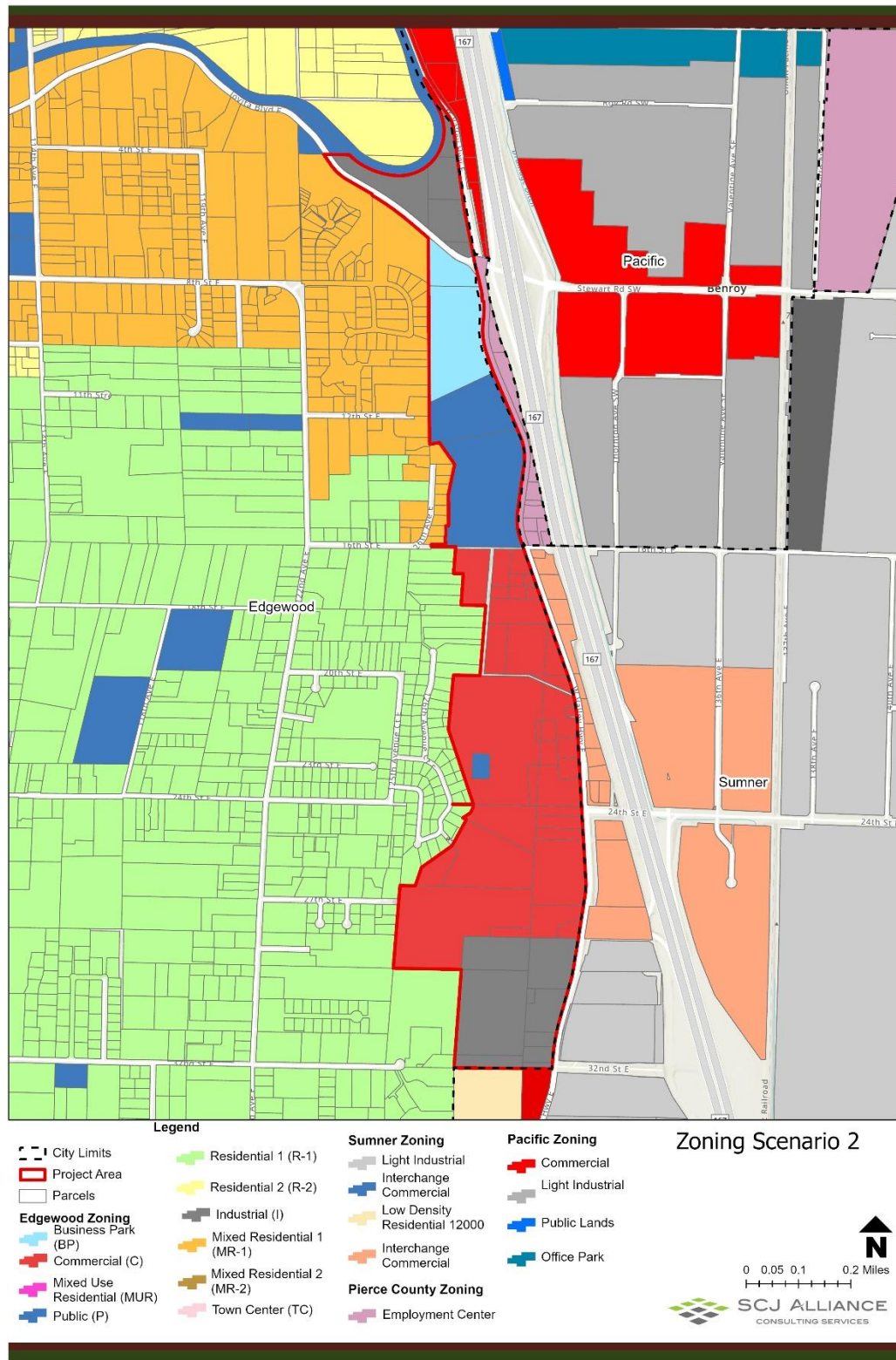
Under this scenario, zoning within the study area would be adjusted as follows:

- ◆ **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 use<sup>1</sup>, 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.

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<sup>1</sup> 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:**

- *Residential<sup>2</sup>*: 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.

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<sup>2</sup> 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<sup>3</sup>:* 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.

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<sup>3</sup> 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**

| <b>Legend (EMC 18.70.040(A))</b><br>✓ Permitted Use<br>– Prohibited Use<br>A Requires AUP<br>CUP Requires CUP |                   | <b>Residential 1</b> | <b>Commercial</b> | <b>Business Park</b> | <b>Industrial</b> | <b>Public</b> |                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------|-------------------|----------------------|-------------------|----------------------|-------------------|---------------|-------------------------------------------------------------------------------------------------------------------------------|
| <b>Land Use Category</b>                                                                                      | <b>NAICS Code</b> | <b>R-1</b>           | <b>C</b>          | <b>BP</b>            | <b>I</b>          | <b>P</b>      | <b>Notes</b>                                                                                                                  |
| Detached Dwelling                                                                                             | Special           | ✓                    | –                 | –                    | –                 | –             | All Uses Subject to Conditions 1 and 6                                                                                        |
| 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           | –                    | ✓                 | –                    | –                 | –             |                                                                                                                               |



| <b>Legend (EMC 18.70.040(A))</b><br>✓ Permitted Use<br>– Prohibited Use<br>A Requires AUP<br>CUP Requires CUP |                       | <b>Residential<br/>1</b> | <b>Commercial</b> | <b>Business<br/>Park</b> | <b>Industrial</b> | <b>Public</b> | <b>Notes</b>                                                           |
|---------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------|-------------------|--------------------------|-------------------|---------------|------------------------------------------------------------------------|
| <b>Land Use Category</b>                                                                                      | <b>NAICS<br/>Code</b> | <b>R-1</b>               | <b>C</b>          | <b>BP</b>                | <b>I</b>          | <b>P</b>      | All Uses Subject to<br>Conditions 1 and 6                              |
| Adult Family Home                                                                                             | 623990,<br>part       | ✓                        | –                 | –                        | –                 | –             | In accordance with<br>RCW 70.128.010(1), as<br>amended                 |
| Nursing and<br>Residential Care<br>Facilities                                                                 | 6231;<br>6232         | –                        | ✓                 | ✓                        | –                 | –             |                                                                        |
| Assisted Living<br>Facilities                                                                                 | 6233                  | –                        | ✓                 | ✓                        | –                 | –             |                                                                        |
| Live/Work Unit                                                                                                | Special               | –                        | ✓                 | –                        | –                 | –             |                                                                        |
| Work/Live Unit                                                                                                | Special               | –                        | ✓                 | –                        | –                 | –             |                                                                        |
| Permanent Supportive<br>Housing                                                                               |                       | ✓                        | ✓                 | ✓                        | –                 | –             |                                                                        |
| Transitional Housing                                                                                          |                       | ✓                        | ✓                 | ✓                        | –                 | –             |                                                                        |
| Agricultural Sales                                                                                            | Special               | ✓                        | ✓                 | ✓                        | ✓                 | ✓             |                                                                        |
| Crop Production                                                                                               | 111, part             | A                        | –                 | A                        | A                 | –             |                                                                        |
| Crop Production, All<br>Other                                                                                 | 111, part             | ✓                        | –                 | –                        | ✓                 | ✓             |                                                                        |
| Animal Production,<br>Personal                                                                                | 112, part             | ✓                        | –                 | –                        | –                 | ✓             | Only permitted as an<br>accessory use to a primary<br>residential use. |
| Cattle Feedlots                                                                                               | 112112                | –                        | –                 | –                        | CUP               | –             |                                                                        |

| <b>Legend (EMC 18.70.040(A))</b><br>✓ Permitted Use<br>– Prohibited Use<br>A Requires AUP<br>CUP Requires CUP |                                                        | <b>Residential<br/>1</b> | <b>Commercial</b> | <b>Business<br/>Park</b> | <b>Industrial</b> | <b>Public</b> | <b>Notes</b>                                                                                                  |
|---------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|--------------------------|-------------------|--------------------------|-------------------|---------------|---------------------------------------------------------------------------------------------------------------|
| <b>Land Use Category</b>                                                                                      | <b>NAICS<br/>Code</b>                                  | <b>R-1</b>               | <b>C</b>          | <b>BP</b>                | <b>I</b>          | <b>P</b>      | All Uses Subject to<br>Conditions 1 and 6                                                                     |
| Animal Production<br>and Aquaculture, All<br>Other                                                            | 112<br>except<br>112210;<br>112112;<br>112511,<br>part | ✓                        | –                 | –                        | ✓                 | CUP           |                                                                                                               |
| Electric Power<br>Generation                                                                                  | 22111                                                  | CUP                      | –                 | –                        | CUP               | CUP           | Not applicable to small-<br>scale, independent<br>residential units or single-<br>building power supply units |
| Solar Electric Power<br>Generation                                                                            |                                                        | ✓                        | A                 | ✓                        | ✓                 | ✓             |                                                                                                               |
| Wind Electric Power<br>Generation                                                                             |                                                        | ✓                        | ✓                 | ✓                        | A                 | A             |                                                                                                               |
| Potable Water<br>Treatment                                                                                    | 221310,<br>part                                        | CUP                      | –                 | –                        | CUP               | CUP           |                                                                                                               |
| Sewage Collection or<br>Treatment Facility                                                                    | 221320,<br>part                                        | CUP                      | –                 | –                        | CUP               | CUP           |                                                                                                               |
| Manufacturing, Craft                                                                                          | Special                                                | –                        | ✓                 | ✓                        | ✓                 | –             |                                                                                                               |
| Manufacturing, Light                                                                                          | 23, part;<br>311<br>except<br>3116;<br>312; 313;       | –                        | –                 | A                        | ✓                 | –             |                                                                                                               |



| <b>Legend (EMC 18.70.040(A))</b><br>✓ Permitted Use<br>– Prohibited Use<br>A Requires AUP<br>CUP Requires CUP |                                                                                                     | <b>Residential<br/>1</b> | <b>Commercial</b> | <b>Business<br/>Park</b> | <b>Industrial</b> | <b>Public</b> | <b>Notes</b>                                                                                                                                                       |
|---------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------|-------------------|--------------------------|-------------------|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Land Use Category</b>                                                                                      | <b>NAICS<br/>Code</b>                                                                               | <b>R-1</b>               | <b>C</b>          | <b>BP</b>                | <b>I</b>          | <b>P</b>      | All Uses Subject to<br>Conditions 1 and 6                                                                                                                          |
|                                                                                                               | 314; 315;<br>316; 337                                                                               |                          |                   |                          |                   |               |                                                                                                                                                                    |
| Manufacturing, Heavy                                                                                          | 23, part;<br>321; 322;<br>323; 324;<br>325; 326;<br>327; 331;<br>332; 333;<br>334; 335;<br>336; 339 | –                        | –                 | –                        | CUP               | –             |                                                                                                                                                                    |
| Wholesale Trade                                                                                               | 423; 424;<br>425                                                                                    | –                        | –                 | A                        | ✓                 | –             |                                                                                                                                                                    |
| Automobile and Other<br>Motor Vehicle<br>Dealers                                                              | 4411;<br>4412                                                                                       | –                        | CUP               | A                        | A                 | –             |                                                                                                                                                                    |
| Gasoline Stations                                                                                             | 447                                                                                                 | –                        | CUP               | ✓                        | ✓                 | –             | Use is limited to 25,000<br>square feet of total site area<br>per zone in the MUR and C<br>zones (total site area<br>includes all accessory and<br>ancillary uses) |
| Alternative Fueling<br>Stations                                                                               | Special                                                                                             | -                        | ✓                 | ✓                        | ✓                 | ✓             |                                                                                                                                                                    |
| Pet and Pet Supplies<br>Stores                                                                                | 453910                                                                                              | –                        | ✓                 | ✓                        | ✓                 | –             |                                                                                                                                                                    |

| <b>Legend (EMC 18.70.040(A))</b><br>✓ Permitted Use<br>– Prohibited Use<br>A Requires AUP<br>CUP Requires CUP |                                                                                                              | <b>Residential<br/>1</b> | <b>Commercial</b> | <b>Business<br/>Park</b> | <b>Industrial</b> | <b>Public</b> | <b>Notes</b>                                          |
|---------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|--------------------------|-------------------|--------------------------|-------------------|---------------|-------------------------------------------------------|
| <b>Land Use Category</b>                                                                                      | <b>NAICS<br/>Code</b>                                                                                        | <b>R-1</b>               | <b>C</b>          | <b>BP</b>                | <b>I</b>          | <b>P</b>      | All Uses Subject to<br>Conditions 1 and 6             |
| Fuel Dealers                                                                                                  | 454310                                                                                                       | –                        | –                 | CUP                      | CUP               | –             |                                                       |
| Sexually Oriented<br>Retail Businesses                                                                        | Special                                                                                                      | –                        | A                 | A                        | A                 | –             | Subject to standards<br>provided in<br>EMC 18.100.100 |
| Retail Trade, All<br>Other                                                                                    | All Other<br>44; 45                                                                                          | –                        | ✓                 | ✓                        | ✓                 | CUP           |                                                       |
| Mini-Warehouses and<br>Self-Storage Units                                                                     | 53113                                                                                                        | –                        | –                 | ✓                        | ✓                 | –             |                                                       |
| Warehousing and<br>Storage, All Other up<br>to 50,000 sq. ft.                                                 |                                                                                                              | –                        | –                 | ✓                        | ✓                 | –             |                                                       |
| Warehousing and<br>Storage, All Other<br>50,001 sq. ft. and<br>greater                                        |                                                                                                              | –                        | –                 | –                        | ✓                 | –             |                                                       |
| General – Business<br>and Professional<br>Services                                                            | All<br>Office<br>Use, plus:<br>51 except<br>517; 52;<br>531; 533;<br>54 except<br>541940;<br>55; 561;<br>813 | –                        | ✓                 | ✓                        | A                 | –             |                                                       |

| <b>Legend (EMC 18.70.040(A))</b><br>✓ Permitted Use<br>– Prohibited Use<br>A Requires AUP<br>CUP Requires CUP |                        | <b>Residential<br/>1</b> | <b>Commercial</b> | <b>Business<br/>Park</b> | <b>Industrial</b> | <b>Public</b> | <b>Notes</b>                              |
|---------------------------------------------------------------------------------------------------------------|------------------------|--------------------------|-------------------|--------------------------|-------------------|---------------|-------------------------------------------|
| <b>Land Use Category</b>                                                                                      | <b>NAICS<br/>Code</b>  | <b>R-1</b>               | <b>C</b>          | <b>BP</b>                | <b>I</b>          | <b>P</b>      | All Uses Subject to<br>Conditions 1 and 6 |
| Wedding and Special<br>Occasion Venues and<br>Events                                                          | Special                | A                        | ✓                 | A                        | A                 | A             |                                           |
| Passenger Car Rental<br>and Leasing                                                                           | 53211                  | –                        | A                 | ✓                        | ✓                 | –             |                                           |
| Truck, Utility Trailer,<br>and RV Rental and<br>Leasing                                                       | 53212                  | –                        | A                 | ✓                        | ✓                 | –             |                                           |
| Consumer Goods<br>Rental                                                                                      | 5322;<br>5323,<br>part | –                        | ✓                 | ✓                        | ✓                 | –             |                                           |
| Commercial and<br>Industrial Equipment<br>Rentals                                                             | 5323,<br>part;<br>5324 | –                        | –                 | ✓                        | ✓                 | –             |                                           |
| Waste Management<br>and Remediation<br>Services, All Other                                                    | 5622,<br>part;<br>5629 | –                        | –                 | CUP                      | CUP               | CUP           |                                           |
| Elementary and<br>Secondary Schools                                                                           | 6111                   | CUP                      | ✓                 | ✓                        | CUP               | A             |                                           |
| Junior Colleges,<br>Colleges,<br>Universities, and<br>Professional Schools                                    | 6112;<br>6113;<br>6114 | –                        | ✓                 | ✓                        | CUP               | A             |                                           |



| <b>Legend (EMC 18.70.040(A))</b><br>✓ Permitted Use<br>– Prohibited Use<br>A Requires AUP<br>CUP Requires CUP |                       | <b>Residential<br/>1</b> | <b>Commercial</b> | <b>Business<br/>Park</b> | <b>Industrial</b> | <b>Public</b> | <b>Notes</b>                                                                                                 |
|---------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------|-------------------|--------------------------|-------------------|---------------|--------------------------------------------------------------------------------------------------------------|
| <b>Land Use Category</b>                                                                                      | <b>NAICS<br/>Code</b> | <b>R-1</b>               | <b>C</b>          | <b>BP</b>                | <b>I</b>          | <b>P</b>      | All Uses Subject to<br>Conditions 1 and 6                                                                    |
| Technical and Trade<br>Schools                                                                                | 6115                  | –                        | ✓                 | ✓                        | A                 | A             |                                                                                                              |
| Educational Services,<br>All Other                                                                            | 6116;<br>6117         | –                        | ✓                 | ✓                        | CUP               | A             |                                                                                                              |
| Ambulatory Health<br>Care Services, All<br>Other                                                              | All Other<br>621      | –                        | ✓                 | ✓                        | CUP               | CUP           |                                                                                                              |
| Hospitals                                                                                                     | 622                   | –                        | ✓                 | ✓                        | CUP               | –             |                                                                                                              |
| Community Care &<br>Walk-in Clinics                                                                           | Special               | -                        | ✓                 | ✓                        | ✓                 | ✓             |                                                                                                              |
| Services for the<br>Elderly and Persons<br>with Disabilities                                                  | 624120                | –                        | ✓                 | ✓                        | CUP               | ✓             |                                                                                                              |
| Vocational<br>Rehabilitation<br>Services                                                                      | 624310                | –                        | ✓                 | ✓                        | CUP               | ✓             |                                                                                                              |
| Child Daycare<br>Services, Home-<br>Based                                                                     | 624410,<br>part       | ✓                        | ✓                 | -                        | –                 | –             | Subject to standards<br>provided in<br>EMC 18.100.040 and<br>requires an applicable<br>Home Business Permit. |
| Child Daycare<br>Services, All Other                                                                          | 624410,<br>part       | –                        | ✓                 | ✓                        | A                 | ✓             | Subject to standards<br>provided in<br>EMC 18.100.040                                                        |

| <b>Legend (EMC 18.70.040(A))</b><br>✓ Permitted Use<br>– Prohibited Use<br>A Requires AUP<br>CUP Requires CUP |                         | <b>Residential<br/>1</b> | <b>Commercial</b> | <b>Business<br/>Park</b> | <b>Industrial</b> | <b>Public</b> | <b>Notes</b>                                          |
|---------------------------------------------------------------------------------------------------------------|-------------------------|--------------------------|-------------------|--------------------------|-------------------|---------------|-------------------------------------------------------|
| <b>Land Use Category</b>                                                                                      | <b>NAICS<br/>Code</b>   | <b>R-1</b>               | <b>C</b>          | <b>BP</b>                | <b>I</b>          | <b>P</b>      | All Uses Subject to<br>Conditions 1 and 6             |
| Social Assistance, All<br>Other                                                                               | All Other<br>624        | –                        | ✓                 | ✓                        | CUP               | CUP           |                                                       |
| Emergency Housing                                                                                             |                         | –                        | ✓                 | A                        | ✓                 | ✓             |                                                       |
| Emergency Shelter                                                                                             |                         | –                        | ✓                 | A                        | ✓                 | ✓             |                                                       |
| Libraries                                                                                                     | Special                 | –                        | ✓                 | ✓                        | A                 | ✓             |                                                       |
| Museums and Art<br>Galleries                                                                                  | 712<br>except<br>712130 | –                        | ✓                 | ✓                        | A                 | ✓             |                                                       |
| Zoos, Aquariums, and<br>Botanical Gardens                                                                     | 712130                  | –                        | ✓                 | ✓                        | ✓                 | A             |                                                       |
| Golf Courses and<br>Country Clubs                                                                             | 713910                  | A                        | ✓                 | ✓                        | ✓                 | A             |                                                       |
| Sexually Oriented<br>Entertainment                                                                            | Special                 | –                        | –                 | CUP                      | CUP               | –             | Subject to standards<br>provided in<br>EMC 18.100.100 |
| Gambling Industries                                                                                           | 7132                    | –                        | A                 | A                        | ✓                 | –             |                                                       |
| Indoor Arts,<br>Entertainment, and<br>Recreation Activities,<br>Other                                         | Special                 | –                        | ✓                 | ✓                        | A                 | ✓             |                                                       |
| Outdoor Arts,<br>Entertainment, and                                                                           | Special                 | A                        | A                 | A                        | –                 | ✓             |                                                       |

| Legend (EMC 18.70.040(A))                   |                          | Residential<br>1 | Commercial | Business<br>Park | Industrial | Public | Notes                                                                                                                                                                                                |
|---------------------------------------------|--------------------------|------------------|------------|------------------|------------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ✓                                           | Permitted Use            |                  |            |                  |            |        |                                                                                                                                                                                                      |
| –                                           | Prohibited Use           |                  |            |                  |            |        |                                                                                                                                                                                                      |
| A                                           | Requires AUP             |                  |            |                  |            |        |                                                                                                                                                                                                      |
| CUP                                         | Requires CUP             |                  |            |                  |            |        |                                                                                                                                                                                                      |
| Land Use Category                           | NAICS<br>Code            | R-1              | C          | BP               | I          | P      | All Uses Subject to<br>Conditions 1 and 6                                                                                                                                                            |
| Recreation Activities,<br>Other             |                          |                  |            |                  |            |        |                                                                                                                                                                                                      |
| Hotels (except Casino<br>Hotels) and Motels | 721110                   | –                | ✓          | CUP              | –          | –      |                                                                                                                                                                                                      |
| Bed-and-Breakfast<br>Inns                   | 721191                   | A                | ✓          | A                | –          | –      |                                                                                                                                                                                                      |
| Short-term Rentals                          | Special                  | A                | ✓          | –                | –          | –      |                                                                                                                                                                                                      |
| RV Parks and<br>Recreational Camps          | 7212                     | A                | –          | –                | A          | –      |                                                                                                                                                                                                      |
| Special Food Services                       | 7223<br>except<br>722330 | –                | ✓          | ✓                | ✓          | ✓      | Allowed as incidental use<br>in residential districts                                                                                                                                                |
| Mobile Vendors                              | 722330                   | A                | ✓          | ✓                | ✓          | ✓      | In R-1, R-2, and MR-1,<br>only permitted within 600<br>feet of a street corner and<br>fronting on a Collector or<br>Arterial road.                                                                   |
| Drinking Places for<br>Alcoholic Beverages  | 722410                   | A                | ✓          | ✓                | ✓          | ✓      | Subject to regulation and<br>classification by the<br>Washington State Liquor<br>and Cannabis Board. In R-<br>1, R-2, and MR-1, only<br>permitted within 600 feet of<br>a street corner and fronting |



| <b>Legend (EMC 18.70.040(A))</b><br>✓ Permitted Use<br>– Prohibited Use<br>A Requires AUP<br>CUP Requires CUP |                             | <b>Residential<br/>1</b> | <b>Commercial</b> | <b>Business<br/>Park</b> | <b>Industrial</b> | <b>Public</b> | <b>Notes</b>                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------|-----------------------------|--------------------------|-------------------|--------------------------|-------------------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Land Use Category</b>                                                                                      | <b>NAICS<br/>Code</b>       | <b>R-1</b>               | <b>C</b>          | <b>BP</b>                | <b>I</b>          | <b>P</b>      | All Uses Subject to<br>Conditions 1 and 6                                                                                                                                                                                   |
|                                                                                                               |                             |                          |                   |                          |                   |               | on a Collector or Arterial<br>road.                                                                                                                                                                                         |
| Restaurants, Full<br>Service                                                                                  | 722511                      | A                        | ✓                 | ✓                        | ✓                 | ✓             | In R-1, R-2, and MR-1,<br>only permitted within 600<br>feet of a street corner and<br>fronting on a Collector or<br>Arterial road.                                                                                          |
| Restaurants, Limited<br>Service                                                                               | 722513;<br>722514           | A                        | ✓                 | ✓                        | ✓                 | ✓             | Subject to compliance with<br>drive-up windows (special)<br>use, if also applicable. In R-<br>1, R-2, and MR-1, only<br>permitted within 600 feet of<br>a street corner and fronting<br>on a Collector or Arterial<br>road. |
| Snack and<br>Nonalcoholic<br>Beverage Bars                                                                    | 722515                      | A                        | ✓                 | ✓                        | ✓                 | ✓             | Subject to compliance with<br>drive-up windows (special)<br>use, if also applicable. In R-<br>1, R-2, and MR-1, only<br>permitted within 600 feet of<br>a street corner and fronting<br>on a Collector or Arterial<br>road. |
| Personal Care<br>Services                                                                                     | 8121;<br>812310;<br>8123200 | A                        | ✓                 | ✓                        | ✓                 | –             | In R-1, R-2, and MR-1,<br>only permitted within 600<br>feet of a street corner and                                                                                                                                          |

| Legend (EMC 18.70.040(A))                                 |                       | Residential<br>1 | Commercial | Business<br>Park | Industrial | Public | Notes                                                                                                                              |
|-----------------------------------------------------------|-----------------------|------------------|------------|------------------|------------|--------|------------------------------------------------------------------------------------------------------------------------------------|
| ✓                                                         | Permitted Use         |                  |            |                  |            |        |                                                                                                                                    |
| –                                                         | Prohibited Use        |                  |            |                  |            |        |                                                                                                                                    |
| A                                                         | Requires AUP          |                  |            |                  |            |        |                                                                                                                                    |
| CUP                                                       | Requires CUP          |                  |            |                  |            |        |                                                                                                                                    |
| Land Use Category                                         | NAICS<br>Code         | R-1              | C          | BP               | I          | P      | All Uses Subject to<br>Conditions 1 and 6                                                                                          |
|                                                           |                       |                  |            |                  |            |        | fronting on a Collector or<br>Arterial road.                                                                                       |
| Automotive Oil<br>Change and<br>Lubrication Shops         | 811191                | –                | A          | A                | ✓          | –      |                                                                                                                                    |
| Car Washes                                                | 811192                | –                | ✓          | ✓                | ✓          | –      |                                                                                                                                    |
| Automotive Repair<br>and Maintenance, All<br>Other        | All Other<br>8111     | –                | A          | A                | ✓          | –      |                                                                                                                                    |
| Other Repair and<br>Maintenance,<br>Consumer              | 811<br>except<br>8111 | –                | A          | A                | ✓          | –      |                                                                                                                                    |
| Other Repair and<br>Maintenance,<br>Commercial/Industrial | 811<br>except<br>8111 | –                | –          | A                | ✓          | –      |                                                                                                                                    |
| Funeral Homes and<br>Funeral Services                     | 812210                | A                | A          | A                | ✓          | –      | In R-1, R-2, and MR-1,<br>only permitted within 600<br>feet of a street corner and<br>fronting on a Collector or<br>Arterial road. |
| Crematoria                                                | 812220,<br>part       | –                | –          | CUP              | CUP        | –      |                                                                                                                                    |
| Kennels                                                   | Special               | –                | A          | A                | A          | CUP    |                                                                                                                                    |

| <b>Legend (EMC 18.70.040(A))</b><br>✓ Permitted Use<br>– Prohibited Use<br>A Requires AUP<br>CUP Requires CUP |                             | <b>Residential<br/>1</b> | <b>Commercial</b> | <b>Business<br/>Park</b> | <b>Industrial</b> | <b>Public</b> | <b>Notes</b>                                                                                            |
|---------------------------------------------------------------------------------------------------------------|-----------------------------|--------------------------|-------------------|--------------------------|-------------------|---------------|---------------------------------------------------------------------------------------------------------|
| <b>Land Use Category</b>                                                                                      | <b>NAICS<br/>Code</b>       | <b>R-1</b>               | <b>C</b>          | <b>BP</b>                | <b>I</b>          | <b>P</b>      | All Uses Subject to<br>Conditions 1 and 6                                                               |
| Veterinary Services                                                                                           | 541940                      | A                        | ✓                 | ✓                        | A                 | A             | Only permitted in<br>residential zones and MR-1<br>as an accessory use to a<br>primary residential use. |
| Pet Care Services, All<br>Other                                                                               | 812910,<br>part             | A                        | ✓                 | ✓                        | A                 | –             | Only permitted in<br>residential zones and MR-1<br>as an accessory use to a<br>primary residential use. |
| Cemeteries                                                                                                    | 812220,<br>part             | A                        | –                 | –                        | –                 | CUP           |                                                                                                         |
| Religious Institution<br>Up to 10,000 sq. ft.                                                                 | 813110,<br>Assembly<br>Only | ✓                        | ✓                 | ✓                        | ✓                 | ✓             |                                                                                                         |
| Religious Institution<br>10,000 to 19,999 sq.<br>ft.                                                          | 813110,<br>Assembly<br>Only | ✓                        | ✓                 | ✓                        | –                 | CUP           |                                                                                                         |
| Religious Institution<br>20,000 to 29,999 sq.<br>ft.                                                          | 813110,<br>Assembly<br>Only | A                        | ✓                 | ✓                        | –                 | CUP           |                                                                                                         |
| Religious Institution<br>30,000 to 39,999 sq.<br>ft.                                                          | 813110,<br>Assembly<br>Only | CUP                      | ✓                 | ✓                        | –                 | CUP           |                                                                                                         |



| <b>Legend (EMC 18.70.040(A))</b><br>✓ Permitted Use<br>– Prohibited Use<br>A Requires AUP<br>CUP Requires CUP |                             | <b>Residential<br/>1</b> | <b>Commercial</b> | <b>Business<br/>Park</b> | <b>Industrial</b> | <b>Public</b> | <b>Notes</b>                                                                       |
|---------------------------------------------------------------------------------------------------------------|-----------------------------|--------------------------|-------------------|--------------------------|-------------------|---------------|------------------------------------------------------------------------------------|
| <b>Land Use Category</b>                                                                                      | <b>NAICS<br/>Code</b>       | <b>R-1</b>               | <b>C</b>          | <b>BP</b>                | <b>I</b>          | <b>P</b>      | All Uses Subject to<br>Conditions 1 and 6                                          |
| Religious Institution<br>40,000 sq. ft. or<br>greater                                                         | 813110,<br>Assembly<br>Only | –                        | CUP               | ✓                        | –                 | CUP           |                                                                                    |
| Correctional<br>Institutions                                                                                  | 922140                      | –                        | CUP               | CUP                      | –                 | CUP           |                                                                                    |
| Administrative Public<br>Facility                                                                             | 92 except<br>922140         | –                        | ✓                 | ✓                        | ✓                 | ✓             |                                                                                    |
| Nonadministrative<br>Public Facility                                                                          | Special                     | –                        | –                 | –                        | –                 | A             | Activities with Outside<br>Storage also subject to<br>EMC 18.90.120                |
| Parks, Open Space,<br>and Public Recreation                                                                   | Special                     | ✓                        | ✓                 | ✓                        | A                 | ✓             |                                                                                    |
| Parking Lots                                                                                                  | 812930,<br>part             | –                        | A                 | –                        | CUP               | CUP           |                                                                                    |
| Parking Structures                                                                                            | 812930,<br>part             | –                        | A                 | –                        | A                 | A             |                                                                                    |
| Drive-Up Windows                                                                                              | Special                     | –                        | ✓                 | A                        | ✓                 | -             | Window shall not face a<br>public ROW and facility<br>must be screened from<br>ROW |
| Outside Displays                                                                                              | Special                     | –                        | ✓                 | ✓                        | ✓                 | ✓             | Activities also subject to<br>EMC 18.95.030(I)                                     |

| <b>Legend (EMC 18.70.040(A))</b><br>✓ Permitted Use<br>– Prohibited Use<br>A Requires AUP<br>CUP Requires CUP |                       | <b>Residential<br/>1</b> | <b>Commercial</b> | <b>Business<br/>Park</b> | <b>Industrial</b> | <b>Public</b> | <b>Notes</b>                                                                                    |
|---------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------|-------------------|--------------------------|-------------------|---------------|-------------------------------------------------------------------------------------------------|
| <b>Land Use Category</b>                                                                                      | <b>NAICS<br/>Code</b> | <b>R-1</b>               | <b>C</b>          | <b>BP</b>                | <b>I</b>          | <b>P</b>      | All Uses Subject to<br>Conditions 1 and 6                                                       |
| Outside Storage                                                                                               | Special               | –                        | –                 | CUP                      | A                 | See Note      | Allowed as incidental use<br>in Public district. Activities<br>also subject to<br>EMC 18.90.120 |





## 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

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Kevin Karl Cook, PE  
BHC Consultants, LLC

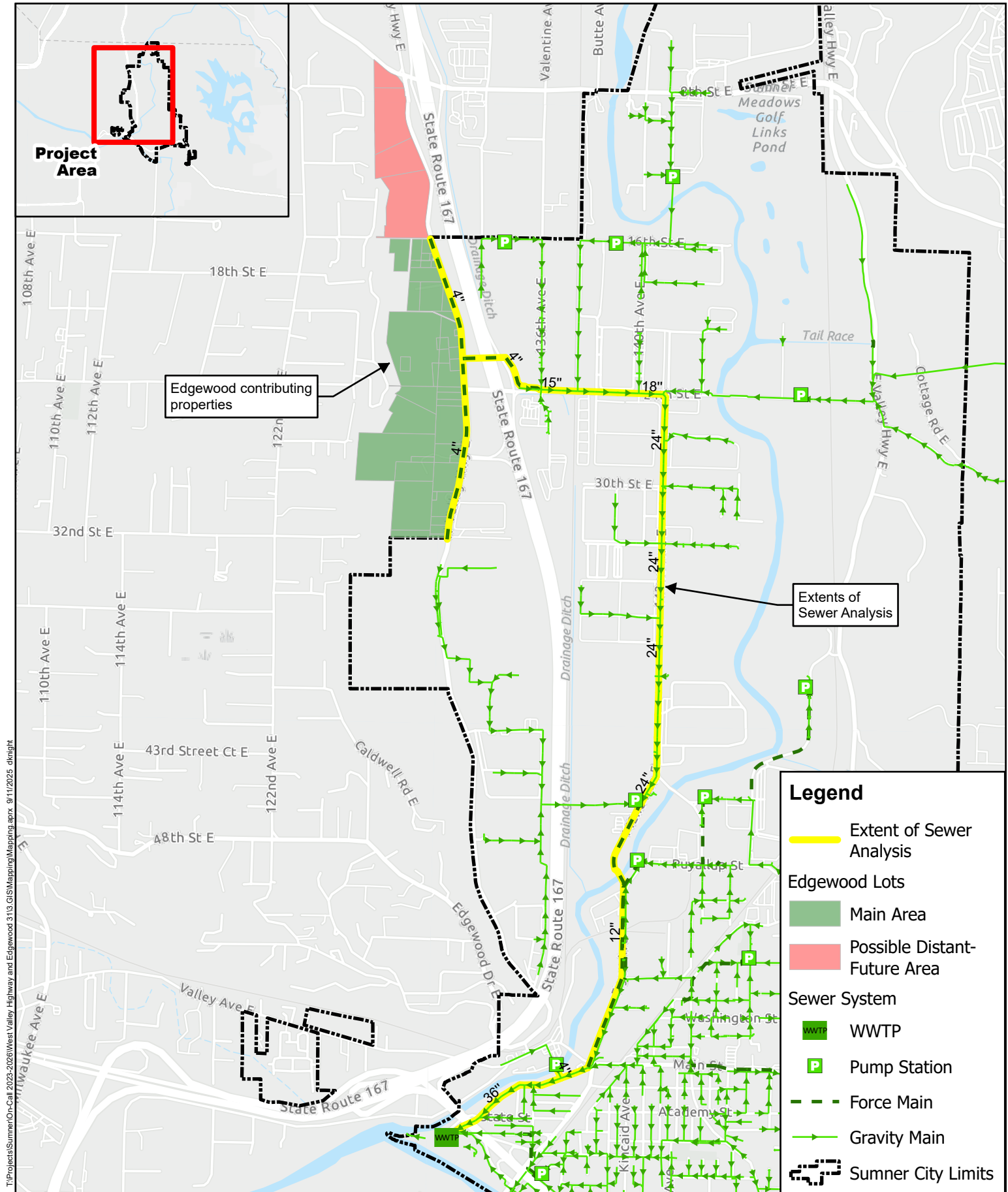
### 1. Introduction

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

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               |
| <b>Total peak sewer flow (gpm)</b> | <b>171.2</b>      | <b>491.4</b>       |

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 136<sup>th</sup> 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 136<sup>th</sup> 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 136<sup>th</sup> 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 104<sup>th</sup> 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](mailto: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](mailto:Gwendolen.Lentes@dfw.wa.gov))  
Megan Tuttle, Assistant RHPM ([Megan.Tuttle@dfw.wa.gov](mailto:Megan.Tuttle@dfw.wa.gov))  
Jessica Bryant, Regional Land Use Lead ([Jessica.Bryant@dfw.wa.gov](mailto:Jessica.Bryant@dfw.wa.gov))  
Brady Green, Habitat Biologist ([Brady.Green@dfw.wa.gov](mailto: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](mailto: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 (9<sup>th</sup> 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 (9<sup>th</sup> Cir. 1980), *cert. denied*, 474 U.S. 994 (1985), *United States v. Washington*, 853 F.3d 946, 964 (9<sup>th</sup> Cir. 2017), *denying petition for reh'g and reh'g en banc*, *United States v. Washington*, 864 F.3d. 1017 (9<sup>th</sup> 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<sub>x</sub>, 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.

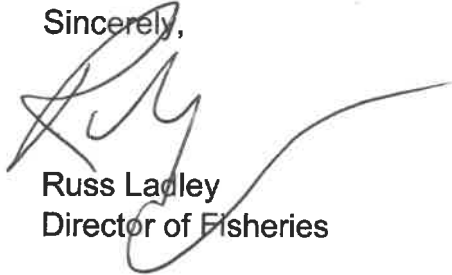
2. Increased stormwater can also be expected given the significantly increased impervious surface coverage anticipated from any of the allowed uses with a change in zoning to industrial development. Increases in impervious surfaces can also negatively impact regional hydrology via a decline in evapotranspiration 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  
Page 7

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





**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**

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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 8<sup>th</sup> St E  
Edgewood, WA 98372

This is an external email. Please use caution when opening any attachments.

## Josh Kubitza

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**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**

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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

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**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

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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](#)

This is an external email. Please use caution when opening any attachments.

803 124<sup>TH</sup> 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](mailto:JEaster1952@gmail.com)  
Tina Vasen      253-219-1921 [Tina.Vasen@gmail.com](mailto:Tina.Vasen@gmail.com)

## Josh Kubitza

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**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**

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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

This is an external email. Please use caution when opening any attachments.



## 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](mailto:dlnelson25@comcast.net)

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## Josh Kubitza

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**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**

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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

810 124<sup>th</sup> 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**

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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

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**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**

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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](mailto:sarahmtorzillo@gmail.com)  
[paultorzillo@gmail.com](mailto:paultorzillo@gmail.com)

This is an external email. Please use caution when opening any attachments.



## Josh Kubitza

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**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**

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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

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**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**

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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

This is an external email. Please use caution when opening any attachments.

## Josh Kubitza

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**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**

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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,

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**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**

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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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### **Disclaimer**

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# State Environmental Policy Act (SEPA)

## Mitigated Determination of Nonsignificance (MDNS)

City of Edgewood

■ 10440 Dom Calata Way E, Edgewood, Washington 98372

■ 253-952-3299

Date of Issuance: July 26, 2026

File: 25-001-COMP PLAN

Project Name: West Valley Highway Comprehensive Plan Amendment and Rezone

Lead Agency: City of Edgewood, Community Development

Agency Contact: Josh Kubitza, AICP, Planning Manager | 253-392-2558 | [comdev@edgewoodwa.gov](mailto:comdev@edgewoodwa.gov)

Project Dates: Application Submitted: 12/8/2025  
Deemed Complete: 12/30/2025  
SEPA Issuance: 07/26/2026  
Comments Due: 08/10/2026

|             |                                                                    |                                                                        |
|-------------|--------------------------------------------------------------------|------------------------------------------------------------------------|
| Proponents: | Jatinder Singh Sandhu<br>1325 V ST NW,<br>Auburn, WA 98001         | Evgeny Tolstosheiev<br>2204 W. Valley Highway E.<br>Edgewood, WA 98372 |
|             | Jonathan Evans<br>2112 W. Valley Highway E.<br>Edgewood, WA 98372  | Double Dip LLC<br>9837 Hilltop Road<br>Bellevue, WA 98004              |
|             | Anton Semenenko<br>2420 W. Valley Highway E.<br>Edgewood WA, 98372 | Manjit Kavr & Sonihal Singh<br>2125 129 PL SE<br>Everett, WA 98208     |
|             | Gurvinder Khera<br>1618 W. Valley Highway E.<br>Edgewood, WA 98372 |                                                                        |

Location: Address(es): Multiple: Impacted addresses provided as an attachment

Tax Parcel(s): Multiple: Impacted tax parcels provided as an attachment

Proposal Description: The proposal is to change the Comprehensive Plan land use designation and zoning of all the properties within the West Valley Highway Overlay Area from Residential/Commercial to Industrial, consistent with the West Valley Highway Land Use Study. The City of Edgewood is reviewing this request under the 2026 annual Comprehensive Plan amendment cycle (Docket Item 25-001-COMP PLAN).

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Documents: All supporting documents are available on the City of Edgewood Public Permit Portal at [portal.edgewoodwa.gov](http://portal.edgewoodwa.gov) or by request from the Community Development Department via email ([comdev@edgewoodwa.gov](mailto:comdev@edgewoodwa.gov)) or phone (253-952-3299).

Page 1 of 4

After reviewing public comments, city staff determined that an alternative may be warranted to limit the types of allowed industrial land uses. As such, the docket item includes the following alternatives:

- Alternative 1: Change the Comprehensive Plan land use designation and zoning of the West Valley Highway Overlay Area from Residential/Commercial to Industrial
- Alternative 2: Change the Comprehensive Plan land use designation and zoning of the West Valley Highway Overlay Area from Residential/Commercial to Industrial and apply a new Limited Industrial (LI) Overlay.

The LI Overlay incorporates necessary performance standards to ensure better neighborhood compatibility.

Requirement for SEPA  
Review:

The proposal is a non-project action. Therefore, the proposal is not exempt and requires a SEPA determination.

Environmental  
Documents:

This threshold determination and associated environmental findings are based on review of the following documents submitted by the applicant and official responses from the city in regard to the underlying permit(s). These documents are incorporated by reference, in accordance with WAC 197-11-635:

1. Planning and Land Use Application
2. SEPA Checklist
3. Existing Land Use Designation Map
4. Proposed Land Use Designation Map
5. 2025 West Valley Highway Land Use Study
6. Comprehensive Plan Amendment Rational (Applicants Response)
7. City Alternative - Draft EMC 18.80.105 Limited Industrial Overlay

Known  
Permits/Approvals  
(Additional Permits  
May Be Required):

Comprehensive Plan Map Amendment and Rezone. All future developments will require critical area review, design review, building permit, site development, Washington State Department of Ecology (Ecology) National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit, City of Sumner Water and/or Sanitary Sewer connection permit(s), Tacoma-Pierce County Health Department (TPCHD) Water and/or Septic Approvals.

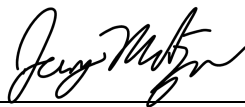
SEPA Determination:

The lead agency has determined that this proposal will not have a probable significant adverse impact upon the environment and has been conditioned to include necessary mitigation measures to compensate for probable significant impacts. An Environmental Impact Statement is not required under RCW 43.21C.030(2)(C). This decision was made after review of a completed Environmental Checklist and other information on file with the city. This MDNS is issued under WAC 197-11-340 and EMC 20.05.150, based on the findings and conclusions noted herein. Issuance of this threshold determination does not constitute approval of the permit. This proposal will be reviewed for compliance with all applicable City codes, ordinances, plans, and policies.

Mitigation Measures: The lead agency for this proposal has determined that the proposal does not have a probable significant adverse impact on the environment if the following mitigation measures are followed:

1. A 100-foot-minimum 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.
2. Future industrial development proposed within 500 feet of residential 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. Additional conditions, such as noise reduction walls, landscape buffers, and building orientation may be applied during project-level design review to mitigate noise and visual impacts on adjacent residential properties.
3. Type IV, 25-foot-width Solid Barrier landscaping is required between proposed industrial uses and any existing, adjacent residential uses.
4. All future construction activities shall implement temporary noise and dust control measures to minimize impacts on adjacent residential properties. These measures shall include, but are not limited to:
  - Limiting construction hours to the City's allowable work hours.
  - Employing dust suppression methods, such as water spraying and soil stabilization.
  - Utilizing noise-reducing equipment and techniques where feasible
  - Installing temporary barriers or screening to reduce dust and noise dispersion.
  - A Construction Mitigation Plan detailing these measures shall be submitted to the City prior to issuance of grading or building permits to the satisfaction of the Public Works Director.
5. Prior to issuance of building permits or any change of use to commercial or industrial land uses, a Design Review application shall be submitted to the City for administrative review and approval. The Design Review shall ensure compliance with critical area regulations, stormwater management, landscaping standards, building orientation, and buffering measures to mitigate potential impacts of the proposed uses. The City may impose additional conditions at the Design Review stage to address site-specific impacts.

SEPA Responsible  
Official:



Signature

7/26/2026

Date

Jeremy Metzler P.E., Community Development Director  
10440 Dom Calata Way E | Edgewood, WA 98372  
[jeremy@edgewoodwa.gov](mailto:jeremy@edgewoodwa.gov) | Ph: (253) 831-4266

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Public Comments: | The public is invited to comment on this MDNS. Written comments on the threshold determination must be received by <u>August 10, 2026</u> via email, mail, or in-person via <a href="mailto:comdev@edgewoodwa.gov">comdev@edgewoodwa.gov</a> or City of Edgewood, 10440 Dom Calata Way E, Edgewood, WA 98372.                                                                                                                                                                                                                                                                                                                                 |
| Appeal Period:   | This SEPA threshold determination may be administratively appealed to the City of Edgewood pursuant to EMC 20.05.250, Appeals. Any appeal must be filed within 14 days from the date the determination becomes final, or by <u>5:00 PM on August 25, 2026</u> (EMC 20.05.250(F)(2)). Prior to submittal of the appeal and associated fee, please consult EMC 20.05.250(J) regarding the information required to submit a SEPA appeal. Be prepared to make specific factual reasons, rationale, and/or basis for the appeal. Appeals may be submitted to by mail or in person to City of Edgewood, 10440 Dom Calata Way E, Edgewood, WA 98372. |
| Public Hearing   | A public hearing is not required action of this SEPA determination but is required for the Comprehensive Plan Map Amendment and Rezone application associated within this SEPA determination. The Planning Commission Public Hearing is scheduled for August 10, 2026 at 6:00 PM at City of Edgewood City Hall, 10440 Dom Calata Way E, Edgewood, WA 98372 or join remote via Zoom at <a href="https://zoom.us/join">zoom.us/join</a> using Meeting ID: 970 6596 9184                                                                                                                                                                         |
| Accessibility:   | For assistive technology (such as a Braille reader, a screen reader, or TTY) users: if the format of any material on this document or the City's website interferes with the ability to access information, please contact us. Please provide a description of the issue, the preferred format in which to receive the material, the web address of the requested material, and contact information. Users who need accessibility assistance can also contact us by phone through the Federal Information Relay Service at 1-800-877-8339 for TTY/Voice communication.                                                                        |





## **CITY OF EDGEWOOD**

### **PLANNING COMMISSION MEETING AGENDA SUMMARY**

Monday, July 13, 2026 – 6:00 PM ♦ City Hall –10440 Dom Calata Way E ♦ Edgewood, WA

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#### **1 CALL TO ORDER**

The meeting was called to order at 6:02pm.

**Present:** Andrew Hardesty, Nick Frantsevich, Layla Church, Carly Lenoir

**Excused:** Joann Overfield

#### **2 PUBLIC HEARINGS**

**a. Concurrency Code Updates**

The public hearing was opened at 6:04pm. Staff presented proposed amendments to the concurrency code, including:

- Increasing the concurrency applicability threshold from 10 trips to 20 trips
- Clarifying that level of service is based on vehicular trips
- Allowing concurrency reporting to occur up to every two years rather than annually

There were no public comments, and the hearing was closed at 6:05pm.

**b. Multifamily Tax Exemptions**

The public hearing was opened at 6:06pm.

Staff presented the proposed Multifamily Tax Exemption (MFTE) program, including:

- Establishing eligible target areas
- Offering 8-year and 12-year exemption options
- Minimum project requirements, affordability provisions, occupancy standards, infrastructure improvements, and tenant displacement protections
- Minor revisions made since previous discussions for clarity and consistency.

Public comment was given in support of the proposal. The public hearing was closed at 6:13pm.

**c. Schober Comprehensive Plan and Zoning Map Amendment (25-002-COMP PLAN)**

The public hearing was opened at 6:14pm. Staff presented the proposed Comprehensive Plan and zoning map amendment for the Schober property, explaining:

- The amendment review process
- Staff's recommendation and evaluation criteria
- Consistency with the Comprehensive Plan
- Environmental review, transportation impacts, land use compatibility, buffering, and mitigation measures
- Planning Commission's role in making a recommendation to City Council

Multiple members of the public testified both in support of and in opposition to the proposal. The public hearing was closed at 7:17pm.

### 3 CITIZEN COMMENT PERIOD

A man identifying himself only as Eric provided comment.

### 4 CONSENT AGENDA:

- a. Review Planning Commission meeting minutes from June 8, 2026

**Motion:** As read **Action:** Approve **Moved by:** Commissioner Church **Seconded by:** Commissioner Lenoir **Motion Passed**

### 5 ACTION ITEMS

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

**Motion:** As read **Action:** Approve **Moved by:** Commissioner Church **Seconded by:** Commissioner Frantsevich **Motion Passed**

### 6 DISCUSSION ITEMS

- a. Schober Comprehensive Plan and Zoning Map Amendment (25-002-COMP PLAN)

The Commission discussed the proposed land use and zoning amendment, staff's recommendation, evaluation criteria, buffering requirements, transportation impacts, environmental mitigation, public testimony received during the hearing, and the recommendation to be forwarded to City Council.

- b. West Valley Highway Comprehensive Plan and Zoning Map Amendment (25-001-COMP PLAN)

Staff introduced the proposed amendment, reviewed the property location, existing and proposed land use designations, consistency with the Comprehensive Plan, transportation considerations, buffering, environmental review, and outlined the process leading to next month's public hearing.

- c. Concurrency Code Updates

Commissioners briefly discussed the proposed amendments increasing the trip threshold, clarifying concurrency calculations, and allowing more flexibility in reporting requirements.

- d. Multifamily Tax Exemptions

Discussion focused on eligibility requirements, affordability standards, target areas, development incentives, infrastructure improvements, tenant protections, and feedback received during the public hearing.

- e. Introduction – Landscaping Standard Code Updates

Staff introduced upcoming landscaping code revisions, explaining they are intended to modernize standards and would return for additional discussion before proceeding to SEPA review and a future public hearing.

### 7 STAFF UPDATES/COMMISSIONER COMMENTS

Staff reported the Council is expected to appoint two new Planning Commissioners, and elections for Chair and Vice Chair will occur at the next meeting. Commissioner Church provided an update on the Climate Action Team.

### 8 ADJOURN

The meeting was adjourned at 8:41pm.



# CITY OF EDGEWOOD STAFF REPORT PLANNING COMMISSION AGENDA ITEM

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Date: August 10, 2026

Title: Concurrency Code Updates

Attachments: Attachment A – DRAFT Recommendation to City Council  
Attachment B – DRAFT EMC Chapter 18.105 Redlines

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.

Staff asked the city's on-call transportation consultant, Transpo Group, to review this code as part of this year's annual report (required under EMC 18.105.220) and provide any recommendations for updates. The three areas of focus suggested are:

- Trip Threshold: EMC 18.105.030(B) sets the concurrency evaluation threshold at "*10 or more new p.m. peak-hour trips.*" With "*substantial remaining capacity across the system*" and most development proposals generating more than 20 new p.m. peak-hour trips, Transpo suggests considering a threshold increase from 10 to 20 trips.
- Multimodal Level of Service (LOS): EMC 18.105.070 currently refers to "road facilities" consistent with the Transportation Element of the City's Comprehensive Plan. The 2024 Comprehensive Plan update also includes LOS measures for pedestrian, bicycle, and transit facilities. To avoid conflict and confusion, staff recommends revising EMC 18.105.070 to explicitly reference "vehicle LOS" as defined in the Comprehensive Plan, rather than using the broader term "road facilities."
- Annual Report Frequency: EMC 18.105.220 currently requires annual reporting and monitoring. Transpo suggests considering a bi-annual reporting schedule, based on recent application trends, the relatively limited change in observed transportation system performance, and available system capacity. 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.

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:

- May 11, 2026 – [Meeting Materials](#) and [Recording](#)
- June 8, 2026 – [Meeting Materials](#) and [Recording](#)
- July 13, 2026 – [Meeting Materials](#) and [Recording](#)

#### Tentative Schedule:

*May 11, 2026 – Planning Commission Introduction (COMPLETE)*

*June 8, 2026 – Planning Commission Discussion (COMPLETE)*

*June 29, 2026 – SEPA Issuance and Comment Period (COMPLETE)*

*July 13, 2026 – Planning Commission Public Hearing (COMPLETE)*

August 10, 2026 – Planning Commission Recommendation

September 1, 2026 – City Council Study Session Introduction

September 8, 2026 – City Council Regular Meeting and Potential Action

#### Current Discussion:

Following the public hearing at last month's meeting, where no comments were provided, and further discussion with the Planning Commission, staff have finalized the attached draft amendments for final review and consideration. Legal review will occur prior to City Council's consideration and minor updates may be required at that time.

#### 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 concurrency management.
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, addresses changes in state law, simplifies and clarifies existing regulations, and is 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 Chapter 18.105 regarding concurrency management. 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 Chapter 18.105 regarding concurrency management, as attached hereto.

RECOMMENDED BY THE CITY OF EDGEWOOD PLANNING COMMISSION  
ON THE 10TH DAY OF AUGUST 2026.

---

TBD  
Planning Commission Chair

Attest by:

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Josh Kubitza, AICP  
Planning Manager

**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

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**Date:** August 10, 2026

**Title:** Multi-Family Tax Exemptions – Standards and Guidelines

**Attachments:** Attachment A – DRAFT Recommendation to City Council  
Attachment B – DRAFT EMC Title 3 Redlines

**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 is the high cost of new construction. Another complication, particularly along Meridian (SR-161) to the 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.

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:

- April 13, 2026 – [Meeting Materials](#) and [Recording](#)
- May 11, 2026 – [Meeting Materials](#) and [Recording](#)
- June 8, 2026 – [Meeting Materials](#) and [Recording](#)
- July 13, 2026 – [Meeting Materials](#) and [Recording](#)

### **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 (COMPLETE)*

*June 26, 2026 – SEPA Issuance and Comment Period (COMPLETE)*

*July 13, 2026 – Planning Commission Public Hearing (COMPLETE)*

### **August 10, 2026 – Planning Commission Recommendation**

September 1, 2026 – City Council Study Session Introduction

September 8, 2026 – City Council Regular Meeting and Potential Action

### **Current Discussion:**

Following the public hearing at last month's meeting, where two comments were provided, and further discussion with the Planning Commission, staff have finalized the attached draft amendments for final review and consideration. Legal review will occur prior to City Council's consideration and minor updates may be required at that time.

### **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 multifamily tax exemptions.**
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: Conditions have not substantively changed since adoption of the 2024 Comprehensive Plan, but this proposed program does implement its 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 basis for the 2024 Comprehensive Plan and its subsequent amendments remain valid.**
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, blending statewide policy with local priorities.**



**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 Title 3 regarding multifamily property tax exemptions. A draft recommendation has been prepared by staff, attached herein for consideration.

Alternatively, the Planning Commission may wish to include input from the Economic Development Advisory Board (EDAB) in their recommendation. The EDAB is scheduled to discuss MFTE at their next meeting and provide feedback to staff on three items:

1. Whether or not a higher non-residential use ratio than EMC 18.80.080(D), Table 1, should be required for MFTE eligibility,
2. Whether or not grease interceptors and/or commercial kitchen HVAC systems should be required for MFTE eligibility, and
3. Whether or not a point-based menu of requirements should be implemented, or simply some minimum number of requirements, to be MFTE eligible.

If this alternative is desired, Planning Commissioners would be encouraged to join the EDAB at their next meeting and participate in the conversation.



CITY OF EDGEWOOD  
PLANNING COMMISSION  
RECOMMENDATION

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The Planning Commission voted X-X to recommend that the City Council adopt the proposed draft amendments to EMC Chapter 18.105 regarding concurrency management, as attached hereto.

RECOMMENDED BY THE CITY OF EDGEWOOD PLANNING COMMISSION  
ON THE 10TH DAY OF AUGUST 2026.

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TBD  
Planning Commission Chair

Attest by:

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Josh Kubitz, AICP  
Planning Manager

**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 household ~~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, or a group of buildings, 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 multifamily ~~unit~~ 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, or other types of temporary housing 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~~52.050(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 eight (8) successive years beginning January 1st of the year immediately following the calendar year of issuance of the final certificate of tax exemption~~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)(~~a~~b). 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)(~~a~~b) may be satisfied solely through housing affordable to moderate-income households.

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.

To be eligible for exemption from property taxation under this chapter, the property shall satisfy all of the following requirements: ~~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 residential targeted areas as defined in SEMC § 3.45.020: ~~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. Size of Project.

1. The project must be multifamily housing consisting of at least twelve (12) dwelling units within a residential structure or as part of a mixed-use development, in which at least 50 percent of the space must provide for permanent residential occupancy;

2. In the case of existing multifamily housing or mixed-use 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.~~

3. Existing multifamily housing that has been vacant for 12 months or more does not have to provide additional units.

~~C.B. Project Tenant Displacement Prohibited.~~ The project must not displace existing residential tenants of structures that are proposed for redevelopment unless the following is provided:

1. If the property proposed to be redeveloped or rehabilitated is not vacant, the applicant shall provide 120-calendar-day notice to each existing tenant impacted by the project, assist them with finding housing of comparable size, quality, price, and location, and a reasonable time frame to relocate. The applicant shall cover the cost of the relocation, which includes moving costs and any required housing deposits.

2. If the existing tenant is a low- or moderate-income household, they shall have first rights to choose one of the proposed affordable housing units. If not, they shall have first rights to choose one of the market rate units.

~~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.~~

~~D.C. Noncompliance With Building Codes~~ Existing Building Rehabilitation. 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.~~

E. Sanitary Sewer Connection. The project must connect or be connected to an available sanitary sewer system.

F. 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.

G. 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.

H. 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.

I. Project Completion Deadline. The project must be completed within three (3) years from the date of issuance of the conditional certificate as provided in EMC 3.45.070 or by any extended deadline granted by the director as provided in EMC 3.45.080.

**3.45.060 Conditional Certificate Application Requirements procedure.**

~~A property owner who wishes to propose a project for a tax exemption shall complete the following procedures:~~

A. The owner of property applying for exemption under this chapter shall submit an application to the Director, on a form established by the Director. 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. For rehabilitation projects and for new development on property upon which an occupied residential rental structure previously stood, the applicant shall also submit an affidavit stating that each existing household was sent a 120-calendar-day move notice and that each household was provided housing of comparable size, quality, and price acceptable to the City;

6. For any household being provided a 120-calendar-day move notice that qualifies as a low-income household, the applicant will also submit an affidavit stating that moving expenses have been or will be provided according to the current Department of Transportation Fixed Residential Moving Costs Schedule;

7. 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.

~~8~~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.~~

C. Fees. At the time of application under this section, the owner shall pay to the City all required fees as established pursuant to RCW 84.14.080 and provided in the City of Edgewood Fee Schedule.

D. Deadline. The application shall be submitted prior to issuance of the building permit, unless otherwise approved by the Director.

**3.45.070 ~~Application for~~ Application review and issuance of 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~~Approval of Application. The director may approve the application if he/she finds that:

1. The owner has complied with all of the requirements of this Section, including but not limited to the project eligibility requirements contained in EMC 3.45.040 and EMC 3.45.050 and the application requirements contained in EMC 3.45.060; and

2. The proposed project is, or will be at the time of completion, in conformance with all approved plans, and all applicable requirements of the Edgewood Municipal Code, local plans, or other applicable requirements or regulations in effect at the time the application is approved.

~~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~~Contract Required. 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. Issuance of Conditional Certificate: Following approval of the contract, the Director shall issue a conditional certificate of acceptance of tax exemption. The conditional certificate shall expire three (3) years from the date of Council approval of the contract unless an extension is granted as provided in EMC 3.45.080.

**D.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.

**E.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 ~~mayor~~ ~~hearing examiner~~ pursuant to ~~e~~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 ~~mayor~~ ~~hearing examiner~~ shall be processed as a Type ~~III-a director decision~~ Minor Administrative Approval pursuant to chapter 18.4056 SEMC. No appeal to the ~~hearing examiner~~ ~~city council~~ is provided from the ~~hearing examiner~~ ~~mayor's~~ decision. The applicant may appeal the ~~hearing examiner~~ ~~mayor'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 Final Certificate Application Requirements** ~~Application for final 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 30 calendar days of receipt of a complete application.

A. Application. Upon completion of the improvements agreed upon in the contract between the applicant and the city and upon issuance of a temporary or permanent certificate of occupancy, the applicant may request a final certificate of tax exemption by filing with the director the following:

1.A. A statement of expenditures made with respect to each multifamily housing unit and the total expenditures made with respect to the entire property;

2.B. A description of the completed work and a statement of qualification for the exemption;

3.C. A statement that the work was completed within the required three-year period or any authorized extension; and

4.D. If applicable, a statement that the project meets the affordable housing requirements in EMC 3.45.030, along with the number, type, and specific multi-family housing units rented or sold to date, as applicable, to meet the affordable housing requirements; and

5. Any additional information requested by the City pursuant to meeting any reporting requirements under Chapter 84.14 RCW.

~~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~~ Issuance 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 ~~Chapter 18.4056~~ SEMC 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 ~~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.

**3.45.110 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 Commerce, 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. Audit. City staff may also conduct audits or on-site verification of any statements provided by the property owner~~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, the owner shall notify the director and the Pierce County assessor in writing within 60 calendar days of the change in use.

A. Effect of Cancellation. If a tax exemption is canceled due to a change in use or other noncompliance, the following taxes and penalties will apply:

1. Additional real property tax, plus interest, shall be imposed based upon the value of the nonqualifying improvements. This additional tax is calculated based upon the difference between the property tax paid and the property tax that would have been paid if it had included the value of the nonqualifying improvements dated back to the date that the improvements were converted to a nonqualifying use.

2. A penalty shall be imposed amounting to 20 percent of the value of the additional property tax plus interest.

3. The interest is calculated at the same statutory rate charged on delinquent property taxes from the dates on which the additional property tax could have been paid without penalty if the improvements had been assessed at full value without regard to this tax exemption program.

4. The additional taxes, interest and penalties will become a lien on the land and attach at the time the property or portion of the property is removed from multifamily use or the amenities no longer meet applicable requirements. The lien has priority over and must be fully paid and satisfied before a recognizance, mortgage, judgment, debt, obligation, or responsibility to or with which the land may become charged or liable. The lien may be foreclosed upon expiration of the same period after delinquency and in the same manner provided by law for foreclosure of liens for delinquent real property taxes. An additional tax unpaid on its due date is delinquent. From the date of delinquency until paid, interest must be charged at the same rate applied by law to delinquent ad valorem property taxes.

B. Notice of Cancellation. Pursuant to RCW 84.14.110(2), upon determining that a tax exemption is to be canceled, the director shall notify the owner by mail, return receipt requested.

C. Appeal. The property owner may appeal the determination of cancellation of the tax exemption to the hearing examiner pursuant to eChapter 18.4056 SMC by filing a notice of appeal with the city clerk within 30 calendar days, specifying the factual and legal basis for the appeal. The hearing examiner will conduct a hearing under eChapter 18.4056 SMC for a Process II action. An aggrieved party may appeal the hearing examiner's decision to the Pierce County superior court under RCW 34.05.510 through 34.05.598.

- 1 **3.45.130 Conflict of provisions.**
- 2 If any provision of this chapter is in legal conflict with the provisions of chapter 84.14 RCW, the provisions of
- 3 chapter 84.14 RCW shall apply as if set forth in this chapter.

DRAFT



## CITY OF EDGEWOOD STAFF REPORT PLANNING COMMISSION AGENDA ITEM

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**Date:** August 10, 2026

**Title:** West Valley Comprehensive Plan and Zoning Map Amendment (25-001-COMP PLAN)

**Attachments:** See Agenda Item 3.a

**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 Edgewood City Council has established a process and criteria for making amendments to the City's Comprehensive Plan under [Edgewood Municipal Code \(EMC\) Chapter 18.60](#).

On February 24, 2026, the City Council approved the final annual docket under [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.

### **Process and Criteria:**

The process for amending the City's Comprehensive Plan is specified in [EMC Chapter 18.60](#), 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.

Alternatives 1 and 2 to amend the Comprehensive Plan Map and Zoning Map are both being analyzed by the City of Edgewood. These alternatives were analyzed under environmental review required by SEPA and are discussed here in detail as it relates to the criteria listed above.

### **Description of Proposal:**

The proposal is to change the Comprehensive Plan land use designation and zoning of the following Tax from Mixed Residential-1 (MR-1) to Industrial (I):

- |                          |                     |              |
|--------------------------|---------------------|--------------|
| • 0420111025             | • 0420141015        |              |
| • 0420111002             | • 0420114046, 4047  |              |
| • 0420114048, 4073, 4075 | • 0420114035        | • 4495400952 |
| • 4495400947             | • 0420118003        | • 4495400951 |
| • 4495400931             | • 0420114063        | • 0420024003 |
| • 4495400948             | • 0420114065        | • 0420111026 |
| • 0420114010             | • 0420114004        | • 0420021022 |
| • 0420114017             | • 0420113141        | • 0420021027 |
| • 0420114007             | • 0420118008        | • 0420021059 |
| • 4495400941             | • 0420114014        | • 0420021058 |
| • 4495400950             | • 0420114041        | • 0420114081 |
| • 0420118002             | • 0420114040        | • 0420114080 |
| • 0420118001             | • 0420024043        | • 0420114001 |
| • 4495400917             | • 0420024039        | • 4495400881 |
| • 0420115004, 5003       | • 4495400932        | • 0420024055 |
| • 4495400980             | • 0420114077        | • 0420024056 |
| • 0420111007             | • 0420021009        | • 0420114022 |
| • 0420111028             | • 0420021064, 1004, | • 4495400949 |
| • 0420111027             | 1020, 2035          | • 0420024003 |
| • 4495400970, 962, 961   | • 4495400891        |              |
| • 0420111003             | • 0420114034        |              |

After reviewing the public comments received to-date, city staff determined that an alternative proposal may be warranted to limit the types of allowed industrial land uses. As such, the docket item now includes the following alternatives:

- 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. (Attachment B).
- Alternative 2: Same as Alternative 1, with a new Limited Industrial (LI) Overlay (Attachment C and D).

### **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 Discussion*

**August 10, 2026 – Planning Commission Public Hearing**

September 14, 2026 – Planning Commission Recommendation

October 6, 2026 – City Council Study Session Introduction

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

### **Current Discussion:**

Planning Commission held a public hearing earlier this evening on the proposed West Valley Highway Comprehensive Plan and Zoning Map Amendment alternatives. The Planning Commission is invited to review and discuss the materials provided under Agenda Item 3.a and any public comments received this evening.

### **Staff Recommendation:**

The Planning Commission is invited to review and discuss the materials provided above and under Agenda Item 3.a





# CITY OF EDGEWOOD STAFF REPORT PLANNING COMMISSION AGENDA ITEM

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**Date:** August 10, 2026

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

**Attachments:**

- A. Existing Future Land Use Designation Map
- B. Applicant Proposed Future Land Use Designation Map (Alternative 1)
- C. City Proposed Future Land Use Designation Map (Alternative 2)
- D. City Proposed Draft Limited Industrial Overlay Regulations
- E. Notice of Application Public Comments
- F. Public Hearing 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 Edgewood City Council has established a process and criteria for making amendments to the City's Comprehensive Plan under [Edgewood Municipal Code \(EMC\) Chapter 18.60](#).

On February 24, 2026, the City Council approved the final annual docket under [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.

## **Process and Criteria:**

The process for amending the City's Comprehensive Plan is specified in [EMC Chapter 18.60](#), 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.

Site-Specific Proposals, like this applicant-proposed amendment, are also subject to the following additional criteria ([EMC 18.60.220\(B\)](#)):

1. Whether the proposed site-specific amendment(s) meets 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);
2. Any proposed site-specific amendment(s) will not result in probable significant adverse impacts to the city's transportation network, capital facilities, utilities, parks and environmental features that cannot be mitigated, and will not place uncompensated burdens upon existing or planned service capabilities;
3. In the case of a site-specific amendment(s) to the comprehensive plan's land use map, that the subject parcels are physically suitable for the requested land use designation and the anticipated land use development, including, but not limited to, the following: (a) access; (b) provision of utilities; and (c) compatibility with existing and planned surrounding land uses;
4. The proposed site-specific amendment(s) will not create pressure to change the land use designation of other properties, unless the change of land use designation for other properties is in the long-term best interests of the city as a whole;
5. The proposed site-specific amendment(s) does not materially affect the land use and population growth projections that are the bases of the comprehensive plan;
6. If within an incorporated urban growth area (UGA), the proposed site-specific amendment(s) does not materially affect the adequacy or availability of urban facilities and services to the immediate area and the overall UGA;
7. The proposed amendment(s) is consistent with any applicable county-wide policies for the city and any other applicable interjurisdictional policies or agreements, and any other local, state or federal laws.

Action Alternatives 1 and 2 to amend the Comprehensive Plan Map and Zoning Map are both being analyzed by the City of Edgewood. These alternatives were analyzed under environmental review required by SEPA and are discussed here in detail as it relates to the criteria listed above. The applicant provided a detailed response to each of the criteria listed above (Attachment E).

### **Why the Amendments are Being Proposed:**

In accordance with [EMC 18.60.220](#), amendment cycles can occur no less frequently than every other year and no more than once per year. Under the 2025 annual amendment cycle, the City Council and Planning Commission provided opportunities for the public to propose amendments to the Comprehensive Plan. Under this docket item (25-0002-COMP PLAN), the City of Edgewood is considering the Comprehensive Plan Map Amendment and corresponding Zoning Map updates to reflect the proposal described below.

### **Description of Proposal:**

The proposal is to change the Comprehensive Plan land use designation and zoning of Tax Parcels 0420234144 and 0420234111 from Mixed Residential-1 (MR-1) to Industrial (I).

After reviewing the public comments received to-date, city staff determined that an alternative proposal may be warranted to limit the types of allowed industrial land uses. Additionally, the applicant has proposed industrial land use table alterations and an 8-foot solid wall barrier for noise and aesthetic screening. As such, the docket item now includes the following alternatives:

- Alternative 1: Change the Comprehensive Plan future land use designation and zoning of Tax Parcels 0420234144 and 0420234111 from MR-1 to I (Attachment B).
- Alternative 2: Same as Alternative 1, with a new Limited Industrial (LI) Overlay (Attachment C and D).

### **Public & Agency Comment:**

Public comments were received during the notice of application comment period, all of which are contained in Attachment E. The following summarizes the general comments:

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

A Notice of Public Hearing was published on June 26, 2026, being 17 days prior to tonight's hearing before the Planning Commission. Comments received between the notice of public hearing and July 9, 2026, are included in Attachment F. Comments received at the public hearing may be viewed online here: [Planning Commission July 13, 2026 | Videos & Movies on Vimeo](#).

### **SEPA Environmental Review:**

Public and agency comments were considered during the environmental review and addressed in the SEPA analysis of the proposed amendments and alternatives, contained in the SEPA checklist. The City of

Edgewood issued a (Mitigated) Determination of Non-Significance on June 28, 2026 with the following the mitigation measures:

1. Access to tax parcels 0420234144 & 0420234111 from Sumner Heights Drive shall be limited to the existing access easement along the southern property boundary of Tax Parcel 0420234144. All other access points shall be removed unless otherwise approved by the Director.
2. Future industrial development proposed within 500 feet of residentially zoned properties shall submit a project-specific Community Noise Impact Assessment demonstrating compliance with [EMC Chapter 8.20](#). This assessment shall evaluate stationary equipment, outdoor loading dock operations, and material handling areas. Additional conditions, such as noise reduction walls, landscape buffers, and building orientation may be applied during project-level design review to mitigate noise and visual impacts on adjacent residential properties.
3. Type IV, 15-foot Solid Barrier landscaping buffer is required for industrial land uses and shall be placed along Summer Heights Drive E.
4. Future non-residential development shall improve Sumner Heights Drive E to current commercial standards between the southern access driveway and the City of Edgewood boundary (under the SR 167 overpass) or demonstrate existing compliance with city standards to the satisfaction of the Public Works Director.
5. All future construction activities shall implement temporary noise and dust control measures to minimize impacts on adjacent residential properties. These measures shall include, but are not limited to:
  - Limiting construction hours to the City's allowable work hours.
  - Employing dust suppression methods, such as water spraying and soil stabilization.
  - Utilizing noise-reducing equipment and techniques where feasible
  - Installing temporary barriers or screening to reduce dust and noise dispersion.
  - A Construction Mitigation Plan detailing these measures shall be submitted to the City prior to issuance of grading or building permits to the satisfaction of the Public Works Director.
6. Prior to issuance of building permits or change to commercial or industrial land uses, 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.

**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

**Current Discussion:**

Staff requests that the Planning Commission members review all attached materials and public comments in preparation for further discussion of this item at this meeting. Staff has the following questions:

1. Does the Planning Commission have any specific questions for staff?
2. Per EMC 18.20.210, the Planning Commission shall develop findings and conclusions to support its recommendation to the City Council that the proposed amendment(s) be denied, approved, or approved with modifications. These findings and conclusions shall be based on the criteria listed above under the "Process and Criteria" section.

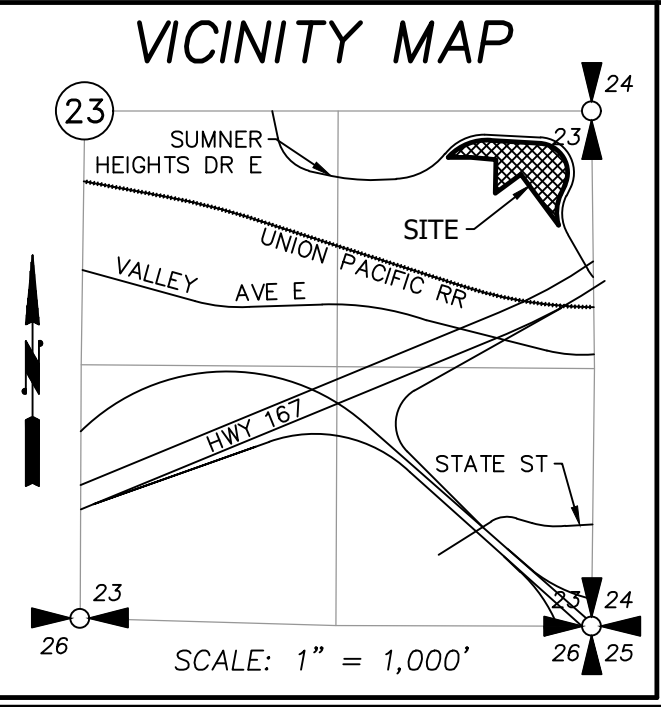
In the July 13, 2026 Public Hearing Staff Report, staff provided draft findings and conclusions based on Alternative 2. However, during the discussion portion of this item, it appeared that a few Planning Commission members may want different findings and conclusions.

Question: Does the Planning Commission majority want revised findings and conclusions?

**Staff Recommendation:**

The Planning Commission request staff to prepare findings and conclusions for formal recommendation to City Council at the next meeting.



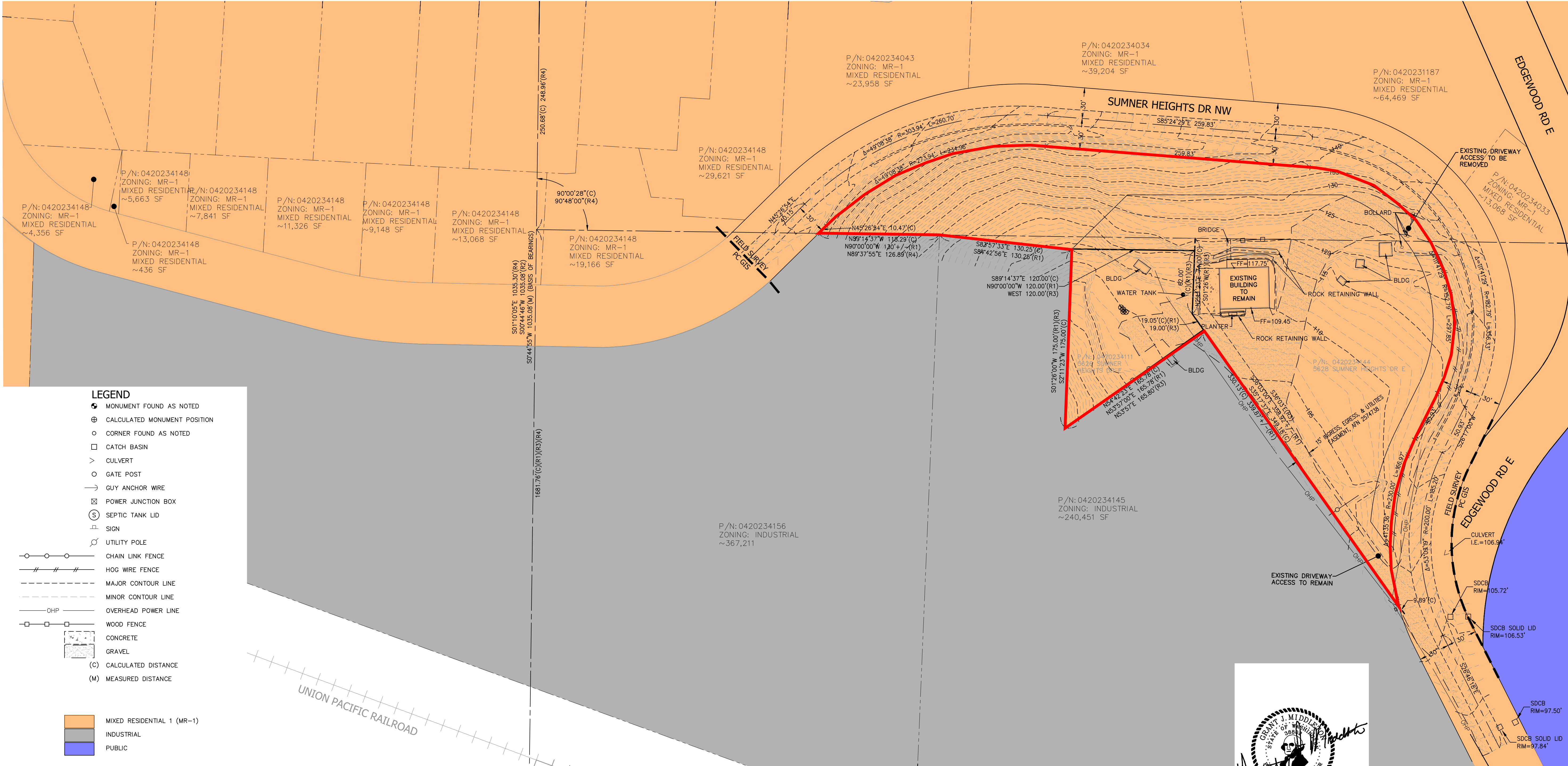
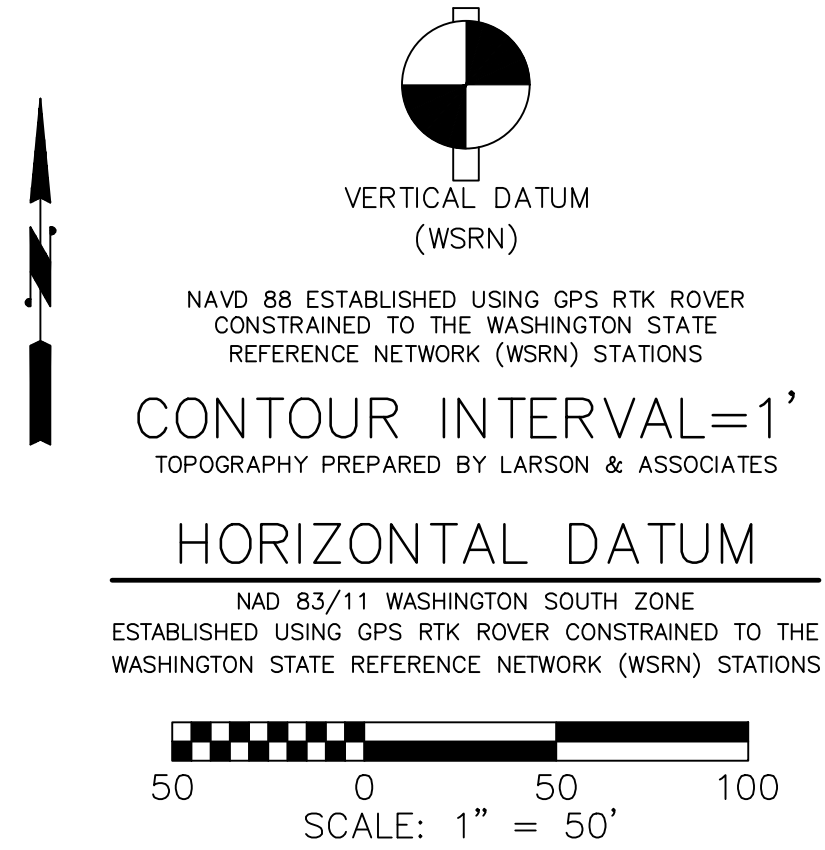


| SITE DATA                     |                                                          |
|-------------------------------|----------------------------------------------------------|
| LAND OWNER:                   | 5626 SUMNER HEIGHTS LLC<br>BROCK SCHOB                   |
| SITE ADDRESS:                 | 5626 AND 5628 SUMNER HEIGHTS DR E,<br>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

## EXISTING FUTURE LAND USE DESIGNATION MAP



### LEGEND

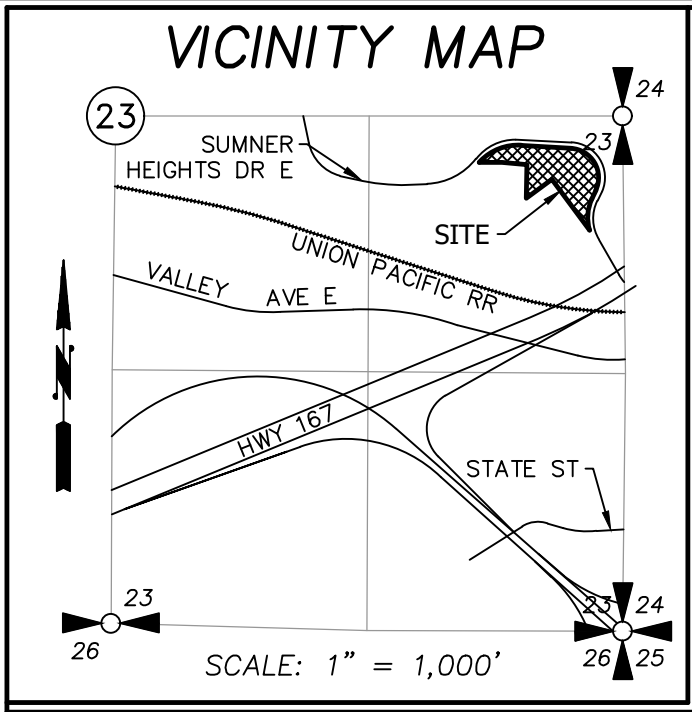
- MONUMENT FOUND AS NOTED
- CALCULATED MONUMENT POSITION
- CORNER FOUND AS NOTED
- CATCH BASIN
- CULVERT
- GATE POST
- GUY ANCHOR WIRE
- POWER JUNCTION BOX
- SEPTIC TANK LID
- SIGN
- UTILITY POLE
- CHAIN LINK FENCE
- HOG WIRE FENCE
- MAJOR CONTOUR LINE
- MINOR CONTOUR LINE
- OHP
- OVERHEAD POWER LINE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

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

| JOB NUMBER                               |              |
|------------------------------------------|--------------|
| 10251                                    |              |
| SCALE                                    | SCALE        |
| HOR. 1"=50'                              | VERT. N/A    |
| DESIGNED G.M.                            | MTD          |
| DRAWN                                    | CHECKED      |
| PROPOSED:                                |              |
| BROCK SCHOB                              |              |
| 180 HANSON ROAD                          |              |
| ELLENSBERG, WA 98926                     |              |
| CONTACT: BROCK SCHOB                     |              |
| PH:                                      |              |
| LARSON and ASSOCIATES                    |              |
| surveyors, engineers & planners          |              |
| 9027 Pacific Avenue, Suite 4             |              |
| Tacoma, WA 98444 (253) 474-3404          |              |
| EXISTING FUTURE LAND USE DESIGNATION MAP |              |
| DATE                                     | DATE         |
| 11/10/2025                               | 11/10/2025   |
| DRAWING NO.                              | DRAWING NO.  |
| 10251BASE                                | 10251BASE    |
| SHEET 1 OF 1                             | SHEET 1 OF 1 |

CVR



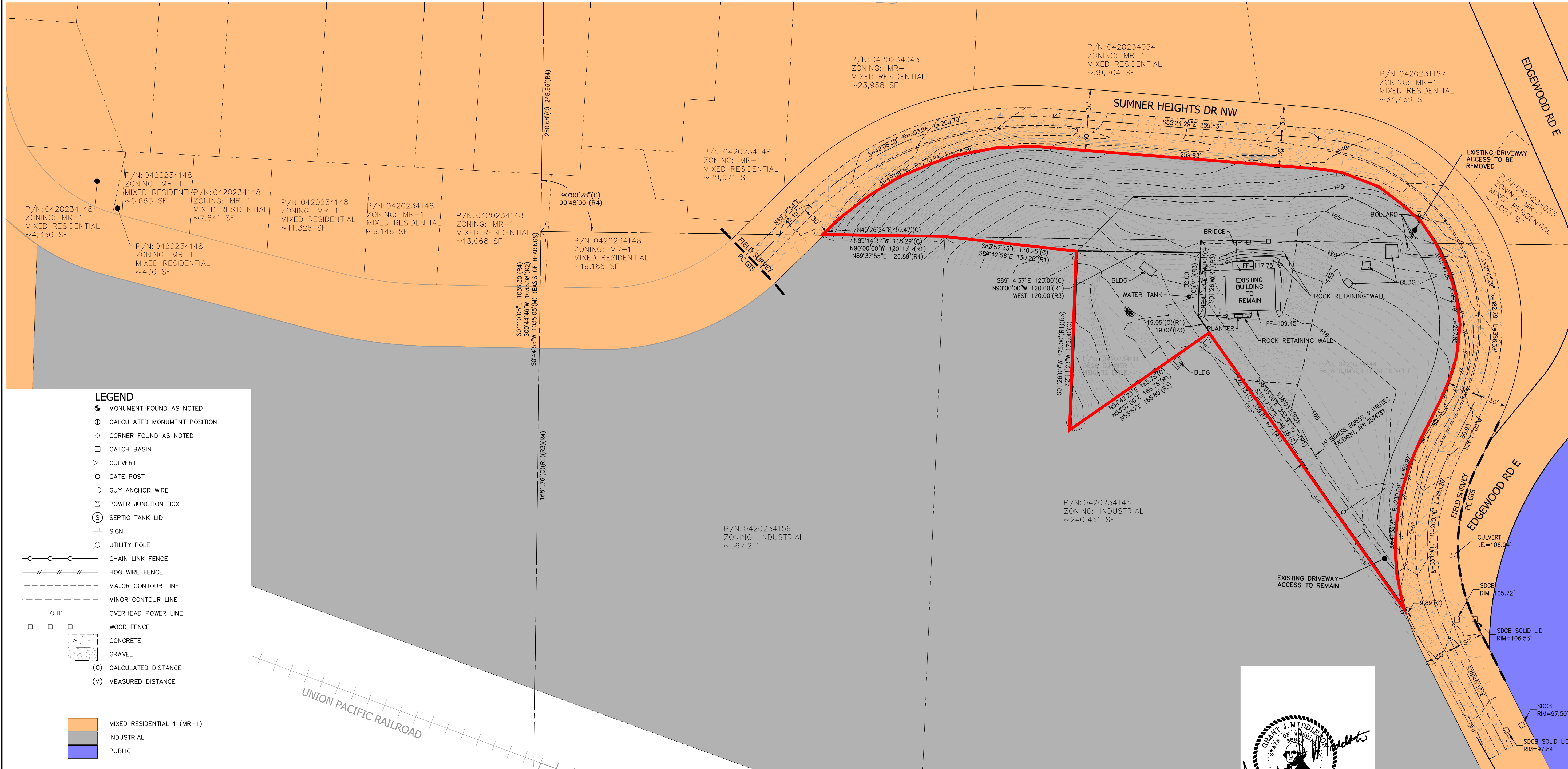
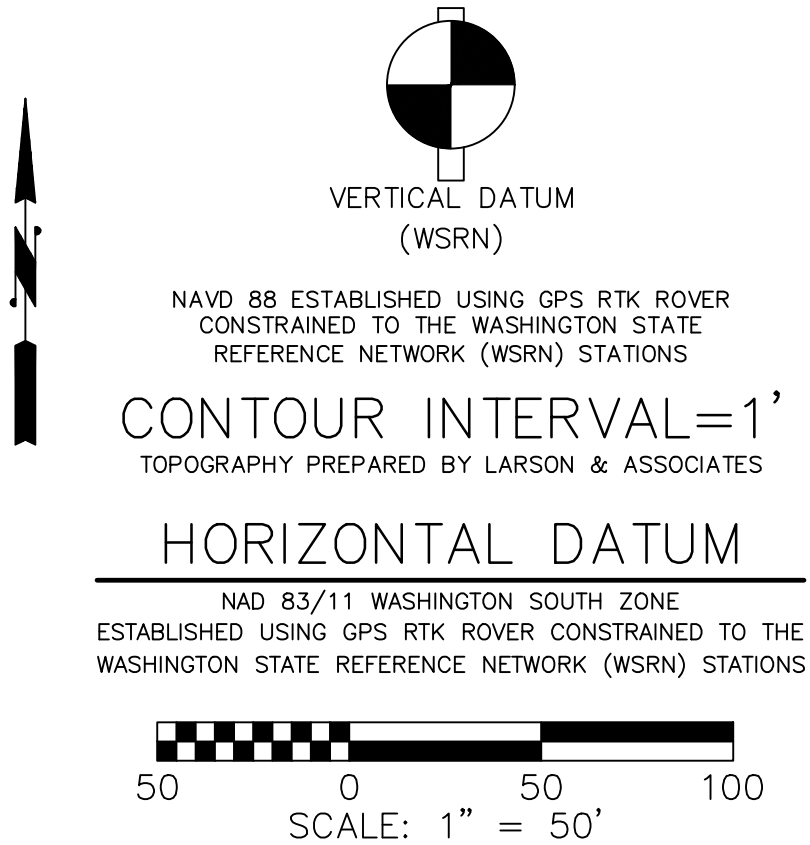


| SITE DATA                     |                                                          |
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| SITE ADDRESS:                 | 5626 AND 5628 SUMNER HEIGHTS DR E,<br>EDGEWOOD, WA 98372 |
| ASSESSOR'S PARCEL NO.:        | 0420234111 & 0420234144                                  |
| 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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- CONCRETE
- GRAVEL
- (C) CALCULATED DISTANCE
- (M) MEASURED DISTANCE

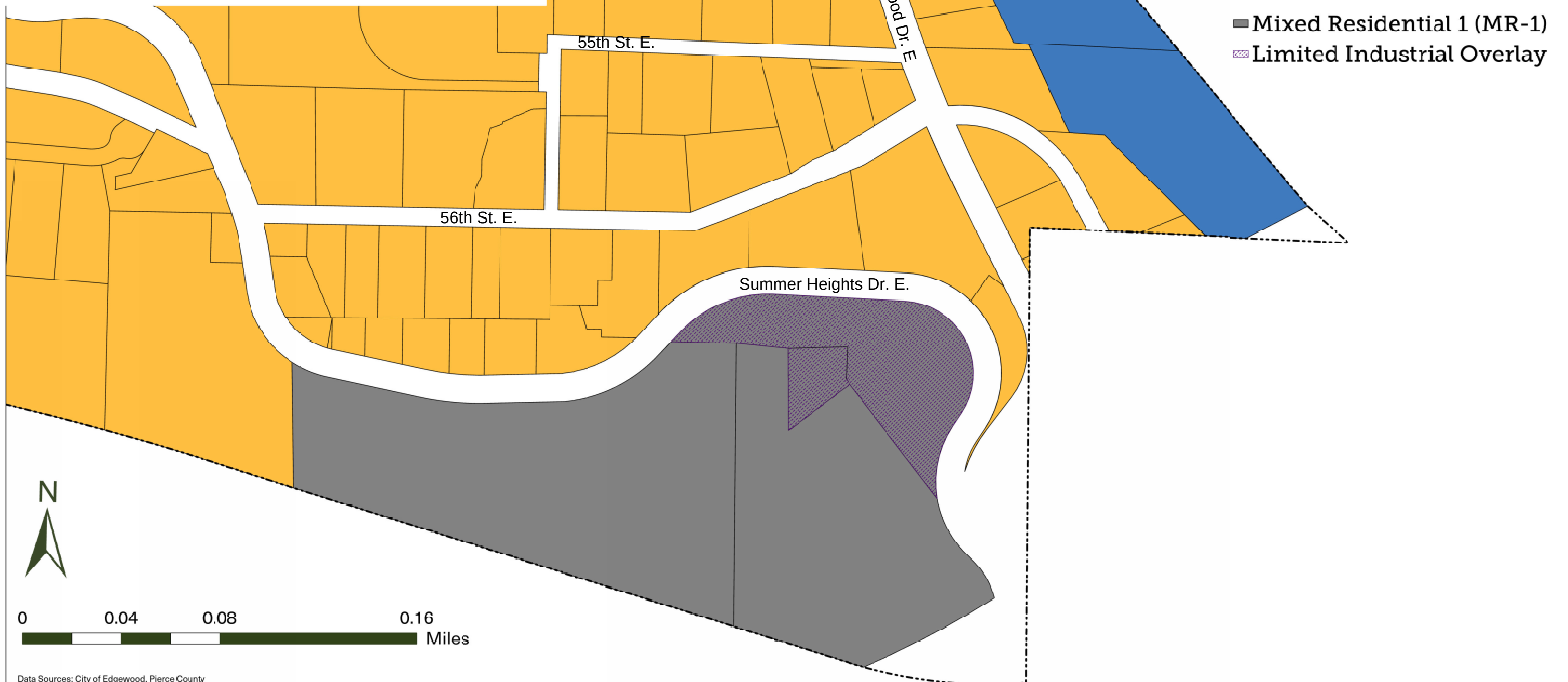
- MIXED RESIDENTIAL 1 (MR-1)
- INDUSTRIAL
- PUBLIC

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

CVR



## 25-002-COMP PLAN Alternative 2



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.

**NEW EMC 18.80.105**

**LIMITED INDUSTRIAL OVERLAY**

A. The limited Industrial (LI) Overlay provides limited industrial uses that are complementary and not detrimental to neighboring residential districts. The LI overlay is limited to areas with long established residential districts and sensitive areas that require additional protection.

B. Applicability. The LI overlay shall be applied to areas specifically designated on the official zoning map.

B. Permitted Uses. For permitted uses within the LI overlay see Chapter 18.70 EMC, Permitted Land Uses, under Industrial (I) zoning district except as provided below or in subsection C and D.

1. The following uses are permitted in the LI overlay:

a. Work/Live (EMC 18.20.260)

b. Parking Lots (NAICS 812930)

C. Conditional Uses.

1. The following uses are conditionally permitted:

a. Manufacturing, light (NAICS 23, part; 311 except 3116; 312; 313; 314; 315; 316; 337)

b. Warehousing and Storage, All other up to 50,000 sq. ft.

D. Prohibited Uses.

1. The following uses are prohibited in the LI overlay.

a. Cattle Feedlots (NAICS 112112)

b. Animal Production and Aquaculture, All Other (NAICS 112 except 112210; 112112; 112511, part)

c. Wind Electric Power Generation (NAICS 221115)

d. Manufacturing, Heavy (NAICS 23, part; 321; 322; 323; 324; 325; 326; 327; 331; 332; 333; 334; 335; 336; 339)

e. Gasoline Stations (NAICS 447)

f. Alternative Fueling Stations (EMC 18.20.040)

g. Fuel Dealers (454310)

h. Sexually Oriented Retail Business (EMC 18.20.220)

i. Warehousing and Storage, All Others 50,0001 sq. ft. and greater

j. Waste Management and Remediation Services, All Other (NAICS 5622, part 5629)

k. Sexually Oriented Entertainment (EMC 18.20.220)

l. Gambling Industries (NAICS 7132)

m. Crematoria (NAICS 812220, part)

E. Development Standards. The requirements of EMC 18.80.100.C shall apply to the LI overlay, except as provided or altered in this subsection,

1. Noise Impact Assessment. Each development or change of land use proposed within 500 feet of residentially zoned property shall be required to submit a project-specific Community Noise Impact Assessment demonstrating compliance with Edgewood Municipal Code (EMC) Chapter 8.20. The Director may waive this if the proposed land use is of less intensity than a previously approved land use.

2. Design Review shall be applicable to all projects within the LI overlay as determined by EMC 18.95.020.

3. Significant tree identification and preservation and/or replacement shall be required as set forth in EMC 18.90.180, Tree preservation. However, no significant healthy trees shall be removed from required natural vegetated buffers.

4. Landscaping. The requirements of EMC § 18.90.090 shall apply to the LI overlay, except for the landscape buffers provided or altered in this subsection.

a. The project shall provide a minimum 100-foot natural vegetated buffer when the subject property directly abuts a residential and/or mixed-residential zoning district. This buffer shall remain natural but may be enhanced with additional plantings. This standard doesn't apply if the zoning districts are divided by a public roadway.

b. Type IV, 25-foot Solid Barrier landscaping is required between proposed industrial uses and any existing, adjacent residential uses.

c. Type IV, 15-foot Solid Barrier landscaping is required between proposed industrial uses and non-arterial roadways, public or private.



**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

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**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**

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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 overtaking 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 56<sup>th</sup> Street East  
Edgewood, WA 98372

This is an external email. Please use caution when opening any attachments.

## Kakai Bojang

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**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**

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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

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**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**

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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

55<sup>th</sup> St E.

This is an external email. Please use caution when opening any attachments.

## Kakai Bojang

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**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 131<sup>st</sup> 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](http://www.avg.com)

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## Kakai Bojang

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**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**

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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

This is an external email. Please use caution when opening any attachments.

## Kakai Bojang

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**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

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**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

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**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**

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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 56<sup>th</sup> st e  
Edgewood  
253-863-1212

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## Kakai Bojang

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**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**

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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

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**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**

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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](mailto:ewall@escoffier.edu)

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## Kakai Bojang

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**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**

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### 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 56<sup>th</sup> Street E  
Edgewood, WA 98372  
206-914-4047

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## Kakai Bojang

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**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

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**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](mailto:jason.ramirez@cityofedgewood.org)

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**From:** JaCinda Barnes <[hyacintheve@hotmail.com](mailto:hyacintheve@hotmail.com)>  
**Sent:** Sunday, April 12, 2026 7:52 AM  
**To:** Jason Ramirez <[jason.ramirez@cityofedgewood.org](mailto:jason.ramirez@cityofedgewood.org)>  
**Subject:** #25-002-COMP

**\*This message is from an External Sender**

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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

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## Kakai Bojang

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**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**

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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

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## Kakai Bojang

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**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**

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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](http://www.virtualsitewalk.com)

[Jake@virtualsitewalk.com](mailto:Jake@virtualsitewalk.com)

Mobile: (619) 341-9208

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## Kakai Bojang

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**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

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## 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**

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Cliff and Jennifer Holmgren  
5214 126th Ave CT E  
Edgewood, WA 98372  
[Jennifer.Holmgren@gmail.com](mailto:Jennifer.Holmgren@gmail.com)  
4/13/2026

City of Edgewood Planning Department  
[comdev@edgewoodwa.gov](mailto: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

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## Kakai Bojang

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**From:** coateswood <coateswood@comcast.net>  
**Sent:** Monday, April 13, 2026 2:35 PM  
**To:** comdev

**\*This message is from an External Sender**

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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

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## Kakai Bojang

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**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.

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## Kakai Bojang

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**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**

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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

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**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

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**Karen Coates**  
5623 131<sup>st</sup> AVE E  
Edgewood WA 98372  
253-341-3983  
[KarCoates@Comcast.net](mailto: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

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## Kakai Bojang

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**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**

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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 valley & 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

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## Kakai Bojang

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**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**

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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 53<sup>rd</sup> 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 56<sup>th</sup> 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

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**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**

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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

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**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**

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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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## Kakai Bojang

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**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.

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## Kakai Bojang

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**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**

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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

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## Kakai Bojang

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**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**

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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

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## Kakai Bojang

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**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**

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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 though 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

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## Kakai Bojang

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**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**

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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

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## Kakai Bojang

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**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**

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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

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**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.*

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**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**

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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

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**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**

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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.

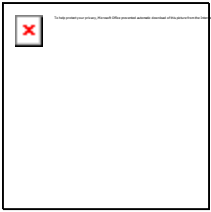
At a minimum, this would require serious buffering and traffic mitigation to even be considered. In its current form, we strongly oppose the proposal.

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](#)

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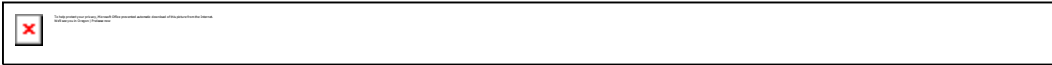
*Director of Marketing and Communications*



**O** 206-277-5202

**M** 719-229-4177

**E** [teddyo@sabey.com](mailto:teddyo@sabey.com)



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## Josh Kubitza

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**From:** Phil Harris <phil.mvpyouth@gmail.com>  
**Sent:** Friday, June 26, 2026 5:07 PM  
**To:** comdev  
**Subject:** Formal Opposition: Schober Comprehensive Plan Amendment

**\*This message is from an External Sender**

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To the City of Edgewood Planning Commission and City Council,

I am writing to strongly oppose the proposed Comprehensive Plan Amendment and Rezone for 5626 and 5628 Sumner Heights Drive East, which seeks to convert land currently designated MR-1 Residential to Industrial.

This proposal is fundamentally incompatible with the established residential character of Sumner Heights Drive and would have significant adverse impacts on wildlife habitat, neighboring property values, environmental quality, and residents' quiet enjoyment of their homes.

Of particular concern is the environmental checklist's repeated reliance on statements indicating impacts will be evaluated or mitigated at some unspecified future date during development permit review. The application repeatedly states that potential impacts associated with noise, lighting, vegetation removal, buffering, hazardous materials, and wildlife preservation will be "determined at the time of development permit application." Residents are being asked to support a permanent rezoning today without meaningful information regarding what industrial activity may ultimately occur tomorrow.

### Wildlife Concerns

The applicant states that no threatened or endangered species are known to occur on the site, yet residents have firsthand observations demonstrating otherwise. Bald eagles, hawks, and a crane regularly utilize this area for feeding, perching, and movement. The site is acknowledged by the applicant as being within the Pacific Flyway. Mature trees, vegetative cover, and open space provide valuable habitat that cannot simply be recreated through future landscaping requirements.

In addition, the proposal dismisses impacts to wildlife by suggesting future buffers and tree retention may be established later. Existing habitat cannot be adequately protected when preservation measures are deferred until after rezoning approval.

### Noise Impacts

The application repeatedly minimizes future noise impacts by stating they will comply with city regulations and be evaluated at the permit stage. Industrial activities inherently introduce truck traffic, loading operations, equipment use, backup alarms, outdoor storage, and employee vehicle trips that differ substantially from residential uses.

Residents should not be expected to accept vague assurances that noise impacts will be addressed later. The burden should be on the applicant to demonstrate compatibility before any land use designation is changed.

## Light Pollution

The proposal similarly states that lighting impacts will be reviewed in the future. Industrial properties frequently require security lighting, parking lot illumination, and nighttime operations. Artificial lighting adversely affects nocturnal wildlife, disrupts migratory bird behavior, and diminishes the rural residential character enjoyed by existing homeowners.

## Property Values

Rezoning residential land to industrial use directly adjacent to established neighborhoods raises serious concerns regarding property values. Numerous studies and market trends indicate that proximity to industrial activities, truck traffic, noise, outdoor storage, and increased lighting can negatively influence residential desirability and marketability.

Homeowners have invested substantial resources into properties purchased with the reasonable expectation that surrounding land would remain consistent with the Comprehensive Plan and existing residential zoning.

## Traffic and Safety

Although the applicant cites a trip generation assessment for a contractor yard, the specific end use remains unknown. Rezoning to industrial creates opportunities for a broad range of future activities beyond what is currently described. Truck traffic, employee parking, deliveries, and equipment movement will inevitably increase demands on local roads and may create safety concerns for residents, pedestrians, and school-aged children.

## Slope Stability and Environmental Concerns

The site contains slopes identified as ranging from 20 to 40 percent. The proposal leaves future grading, erosion control, and stormwater mitigation largely unresolved. Alteration of vegetated slopes has the potential to increase erosion, sedimentation, and runoff issues affecting neighboring properties.

## Premature Approval

The central flaw in this application is that it seeks approval of a permanent Comprehensive Plan amendment and industrial rezone while reserving nearly every meaningful environmental analysis for a future permit process. Residents are effectively being asked to approve an unknown industrial use based on promises that impacts may be studied later.

Land use decisions should be based on demonstrated compatibility with surrounding neighborhoods, not assumptions regarding future mitigation measures.

For these reasons, I respectfully urge the Planning Commission and City Council to deny the requested Comprehensive Plan Amendment and Rezone and preserve the residential character, environmental integrity, wildlife habitat, and property values of the Sumner Heights neighborhood.

Sincerely,

Philip Harris

13112 56th Street East  
Edgewood, Washington

Sincerely,

Phil Harris

This is an external email. Please use caution when opening any attachments.

Thriving Together Counseling,  
PLLC



Blanca Yvette Valadez 100 N Howard St  
Suite W Spokane , WA 99201 (509)  
217-9583  
blancavaladez@mindfultherapygroup.com

July 6, 2026

To Whom It May Concern:

Mariah Goyenechea is my patient and has been under my care since January 22, 2026. I am intimately familiar with their history and with their functional limitations imposed by their mental health-related disabilities. Due to this disability, Ms. Goyenechea has certain limitations regarding stress/coping/social impairments and anxiety. I wanted to reach out to provide insight on the impact that one of the city's proposals (Proposal 25-002 Comp Plan) has impacted one for your residents and I am sure many residents in the City of Edgewood. During the time that her neighbors were utilizing their property for commercial purposes; the client was experiencing significant anxiety that impacted her sleep, work and relationships. The proposal has left Ms. Goyenechea living in great emotional distress and in fear that she will confront the former issues that she endured.

Should you require further information, please contact me. I can be reached directly at the contact details listed above.

Sincerely,

Thriving Together Counseling

*Blanca Yvette Valadez MSW, LSWAIC*

Washington State Department of Health LIC # SC 61421000





# CITY OF EDGEWOOD STAFF REPORT PLANNING COMMISSION AGENDA ITEM

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**Date:** August 10, 2026

**Title:** Landscaping Standards Review and Updates

**Attachments:** Attachment A – DRAFT EMC Title 18 Redlines

**Submitted By:** Jeremy Metzler, PE – Community Development Director

**Background Information:**

Following the Planning Commission’s 2026 Work Plan, this item was identified for review and study. As currently codified, the city’s current landscaping standards and regulations are located in several sections, with varying applicability depending on project type and location:

- [EMC 18.80.080\(G\)](#) – TC, C, MUR and BP zoning districts, Landscaping
- [EMC 18.90.090](#) – Development Standards – Citywide applicability, Landscaping
- [EMC 18.95.030\(H\)](#) – Design Standards, Site planning, Landscaping

Several specific issues have been identified by staff for review, summarized as follows:

- Consolidating all landscaping standards under a single section or chapter would reduce conflicts, remove redundancy, and improve clarity for applicants and staff.
- References to “utilities Level 1” are outdated and need updating. As originally codified under Ordinance 03-0203, EMC 18.70.070 Utilities use category listed several “levels” for various utilities, as follows:
  - Communications Facilities
    - Level 1 – Local cable, fiber optics, traffic control, or telephone transmission lines, poles, or apparatus, not including antennas, wireless telecommunications facilities, structures, or private antennas and satellite dishes.
    - Level 2 – Regional cable, fiber optics, traffic control, or telephone transmission lines, poles, or apparatus, not including antennas or wireless telecommunications facilities.
    - Level 3 – Wireless telecommunications facilities.
  - Electrical Facilities
    - Level 1 – Local distribution lines.
    - Level 2 – Sub and switching equipment.
    - Level 3 – Industrial or regional distribution lines and associated sub and switching stations.
  - Water Supply Facilities

- Level 1 – Local distribution systems, well-heads, pump stations, water purification facilities not exceeding 2,000 square feet of building area, water storage facilities.
  - Level 2 – Water purification facilities exceeding 2,000 square feet of building area.
  - Level 3 – Chemical storage, handling, and usage in a water supply facility excluding fluoride.
- With the recent adoption of Public Works Standards, staff recommends removing all public works and/or non-landscaping elements from the landscaping regulations.
  - Larger landscape buffers in high-density zoning districts like Town Center seem to be in conflict with the overall intent and desired aesthetic, when thinking about long term redevelopment.
  - Type 1 buffers currently serve multiple purposes and have varying widths, depending on location and zoning. Separating out these different purposes would provide clarity.
  - The Type 4 buffer standards require arborvitae and shrubs both in close proximity, which does not allow for successful growth and establishment.
  - There have been regional conversations developing regarding landscaping standards and wildfire preparedness, and it may be appropriate to incorporate these conversations into this update. See the National Fire Protection Association (NFPA) website for more information:  
<https://www.nfpa.org/en/education-and-research/wildfire/preparing-homes-for-wildfire>

Finally, staff offers the following references as examples of other agency regulations that are clear and well received by the development community:

- Bonney Lake Municipal Code 16.68: <https://ecode360.com/46326080>
- Lakewood Municipal Code 18A.70: [https://lakewood.municipal.codes/LMC/18A.70\\_ArtII](https://lakewood.municipal.codes/LMC/18A.70_ArtII)
- Puyallup Municipal Code 20.58: <https://ecode360.com/47723184>
- Sumner Municipal Code 18.41: <https://ecode360.com/47287318>
- University Place Municipal Code 19.65.090: <https://ecode360.com/48915218>
- Pierce County Code 18J.15.040: <https://pierce.county.codes/PCC/18J.15.040>

### **Tentative Schedule:**

*July 13, 2026 – Planning Commission Introduction (COMPLETE)*

### **August 10, 2026 – Planning Commission Discussion**

September 14, 2026 – Planning Commission Discussion

September 27, 2026 – SEPA Issuance and Comment Period

October 12, 2026 – Planning Commission Public Hearing

November 9, 2026 – Planning Commission Recommendation

November 17, 2026 – City Council Study Session Introduction

November 24, 2026 – City Council Regular Meeting and Potential Action

### **Current Discussion:**

Staff has reviewed the subject code sections while considering the specific issues listed above, and attached are suggested draft code revisions for the PC's discussion and consideration. Additionally, staff is looking for additional direction on the following topics:

#### 1. Subdivision and/or Short Plat Screening

The current issue: The current code does not require landscape screening, fencing, or buffers between new subdivisions and short plats and neighboring residential properties. Common neighborhood comments provided during subdivision reviews indicate that the small lots do not match the existing neighborhood. Requiring landscape buffer or solid fence may reduce some of the community's concern.

Question: Is the Planning Commission interested in requiring a small landscape buffer and/or fencing around the perimeter of subdivisions and/or short plats?

#### 2. Zoning Landscaping Standards

The current issue: The current code requires a landscape buffer between zoning districts. For example, the landscape buffer for a Town Center-zoned project next to a Mixed-Use Residential zone is 15 feet, and the buffer for a Mixed-Use Residential project next to the Town Center zone is also 15 feet. As a result, there can be a combined 30-foot landscape buffer between uses of the same intensity. It is staff opinion that 30-feet of screening is not require between similar uses.

Question: Is the Planning Commission interested in establishing a smaller landscape buffer between the Mixed-Use Residential, Town Center, Commercial, and Business Park zones? *(Please note that the code currently allows the Director to increase the landscaping requirements if the proposed land use is more intense than the neighboring land use.)*

#### 3. Planting Diversity

The current issue: The code encourages planting diversity but does not define what that means.

Question: Is the Planning Commission interested in establishing a specific diversity requirement? For example, specifying that no more than 50% of any proposed landscape type (trees, shrubs, or groundcovers) may utilize a single plant species.

#### 4. Firewise Landscaping Requirements:

The city does not currently have any Firewise landscaping requirements. In general, Firewise planting distance recommendations can conflict with standard tree and shrub spacing guidelines, and city codes do not appear to specifically address these requirements in the landscape regulations. However, the Washington State Wildland-Urban Interface (WUI) Code, which is likely

to take effect in summer 2027, may change that by potentially limiting tree spacing and the required distance of trees from homes.

Question: Is the Planning Commission interested in establishing a specific requirement that a percentage of trees planted on a site be identified as fire-resistant? Are there other potential standards that city staff should consider?

5. General Landscape Code

Question: Are there other landscaping standards that the Planning Commission would like city staff to further investigate?

**Staff Recommendation:**

Preparing for one more detailed discussion at next month's PC Meeting before scheduling a public hearing, staff recommends that the commissioners review the attached draft amendments, along with the linked and referenced materials.

## Chapter 18.80

### LAND USE ZONES

#### 18.80.080 Town Center, Commercial, Mixed Use Residential and Business Park zoning districts.

##### G. Landscaping and Tree Preservation.

1. Landscaping shall be provided as set forth in EMC § 18.90.090, Landscaping, as it applies in their appropriate zones.

2. Tree Preservation. Significant tree identification and preservation and/or replacement shall be required as set forth in EMC § 18.90.180, Tree preservation. Mixed-use development shall be considered commercial development for the purposes of the tree preservation. The director shall have the authority to reduce the required tree replacement ratio where such requirement would conflict with the urban design intent of this section and applicable design provisions of Chapter 18.95 EMC

~~1. Applicability. The requirements of EMC § 18.90.090 shall apply to the TC, C, MUR and BP zones, except as provided in this subsection. Please also see Chapter 18.95 EMC for applicable design standards. Where landscape regulations in this section conflict with the provisions in EMC § 18.90.090 or Chapter 18.95 EMC, the regulations in this subsection shall control. Please note: Where this section is silent on a specific requirement, such as irrigation requirements or minimum standards for plantings, the standards contained in EMC § 18.90.090 and 18.95.050 shall apply. The standards contained in EMC § 18.90.090(G) (Landscaping Types) are specifically modified by this subsection and the standards contained in EMC § 18.90.090(H) (Landscaping Regulations by Zoning Districts) do not apply to TC, C, MUR and BP zones.~~

~~2. Street Frontages. In addition to landscape standards contained below, five percent of the total area between the building facade and the curb shall be landscaped. Within the BP zoning district 10 percent of the total area between the building facade and curb shall be landscaped. This shall be in addition to street trees and landscaping provided in public spaces and parking lots that are required in other subsections.~~

~~a. Required landscaping may be planted within planting areas surrounding trees, in raised planters, and on vegetative walls mounted to the ground level building facade. Landscaping shall incorporate LID systems to the maximum extent feasible (per Minimum Requirement No. 5 of the PCM).~~

~~b. Where a building or portion of a building is located more than 10 feet from a public sidewalk or usable public space, all area between the building and the public sidewalk that is not used for vehicle or pedestrian access, circulation, parking or seating shall be landscaped.~~

~~c. Potted landscape material may be substituted for required landscaping in areas designed for outdoor eating with the approval of the department.~~

~~3. Public Spaces. A minimum of 15 percent of the total area of a public space, such as a courtyard or plaza, shall be landscaped.~~

~~4. Surface Parking Areas. Surface parking areas shall be landscaped as set forth in EMC § 18.90.090.~~

~~5. Street Frontages. Street frontage design and landscaping shall be provided as contained in Chapter 18.95 EMC and EMC Title 12, Streets, Sidewalks and Public Places.~~

6. Landscape Buffers – Standards and When Required.

a. Development in the TC, C and MUR zoning districts shall provide a minimum 20-foot Type IV landscape buffer where they abut Single-Family zoning districts or 15 feet of Type I landscaping where they abut Mixed Residential or Public zoning districts. The director may waive or modify this requirement for pedestrian-oriented development adjacent to the Public zoning district where consistent with the purpose of this section.

b. Development in the BP zoning district shall provide a minimum 25-foot Type IV landscape buffer where it abuts Single-Family or Public zoning districts. In addition, 15 feet of Type I landscaping shall be provided between adjacent BP zoned properties.

c. Commercial or light industrial development in the C and MUR zoning districts shall provide a minimum 10-foot-wide Type I landscape buffer adjacent to the TC zoning district. The director may waive this requirement for pedestrian-oriented commercial development that includes a minimum of 50 percent of the lot frontage occupied by a building. Landscaping for surface parking areas shall still apply.

d. A minimum of a 10-foot Type I landscape buffer shall be provided between more intensive zones and the MUR, and along abutting properties in the MUR district. The director may waive or modify this requirement for pedestrian-oriented commercial development that includes a minimum of 50 percent of the lot frontage occupied by a building or for abutting residential development in the MUR zone in common ownership. Required landscaping for surface parking areas is required in accordance with EMC § 18.90.090 and Chapter 18.95 EMC.

7. Special Landscaping in the Business Park (BP) Zone. In order to achieve the urban design intent and provide an environment suitable to a wide range of employment uses, a minimum of 20 percent of the total site area in the BP zone shall be landscaped.

#### ~~8. Tree Preservation and Protection Standards.~~

~~a. Significant tree identification and preservation and/or replacement shall be required as set forth in EMC § 18.90.180, Tree preservation. Mixed use development shall be considered commercial development for the purposes of the tree preservation.~~

~~b. The director shall have the authority to reduce the required tree replacement ratio where such requirement would conflict with the urban design intent of this section and applicable design provisions of Chapter 18.95 EMC.~~

~~c. If the standards contained in Chapter 18.95 EMC are modified, the director shall at a minimum ensure that representative native vegetation is retained or replanted totaling at least five percent of the site area and that such landscaping is provided in excess of the requirements contained in this section.~~

...



## Chapter 18.90

### DEVELOPMENT STANDARDS – CITYWIDE APPLICABILITY

...

#### 18.90.090 Landscaping.

A. Purpose. This section establishes landscape design, implementation, and maintenance, ~~street trees, and landscaping~~ standards for new construction. The use of landscaping, street trees, and the retention of existing vegetation by property owners reduces visual, noise and lighting impacts, and promotes compatibility between land uses while enhancing the visual appearance of the city. Landscaping protects and enhances critical areas, facilitates aquifer recharge, reduces erosion and stormwater runoff, and helps to define public and private open spaces. Landscaping provides an opportunity for a balanced and harmonious environment for both the local citizens of a community as well as the resident wildlife species of an area. Man has the ability to shape and mold his environment to meet his needs, but often forgoes the need of other species sharing his environment. Proper selection and arrangement of landscaping can emphasize the buildings it surrounds, be pleasing to the eye and still be useful to the birds and other wildlife with a surprising rate of success. By providing a diversity of trees, shrubs and grasses, one can increase the chances of providing a balanced habitat for a greater variety of wildlife, while at the same time provide an aesthetically pleasing visual environment. In addition, proper landscaping can prevent soil erosion, and provide for slope stabilization. Landscaping that incorporates LID practices and standards can provide stormwater runoff reduction, detention, and/or treatment benefits. This section also encourages the use and protection of vegetation native and common to the Puget Sound region while providing policies and standards for the maintenance of natural vegetation and maintenance of landscaping within the city of Edgewood.

B. Applicability. Except as provided under subsection C below, ~~This section shall be used in the review of all land development permits and land use activities with the exception of existing lots that cannot be further subdivided.~~ The requirements for landscaping and street trees are applicable citywide and shall be provided in accordance with ~~the requirements of each individual zoning district and~~ the provisions of this section. In the event a permit is not required for the establishment of a use, the standards of this section still apply.

C. Exceptions. Exceptions to this section may be allowed at the discretion of the community development director or designee under the following circumstances:

1. If contiguous lots or driveways are developed jointly with like uses, a portion of the perimeter buffering requirements between the jointly developed lots may be relocated to other areas of the site at the discretion of the community development director or designee; provided, that the remaining portion of the perimeter buffering area is landscaped in a pedestrian-friendly manner.

2. Where existing vegetation can provide the same level of screening as required by the landscaping requirements, the community development director or designee may grant a waiver from the standard requirements. In this case, the applicant is responsible for submitting to the community development department an alternative conceptual landscape plan, supporting photographs and a brief explanation as to how the alternative plan satisfies the intent of the landscape level required. Supplemental plant material may be required to be installed within, or adjacent to, the natural landscape area to fully comply with the intent of the required landscape level.

3. ADD AN EXCEPTION FOR DETACHED AND ACCESSORY RESIDENTIAL DEVELOPMENT ON EXISTING LEGAL LOTS (clarifies stricken exception under applicability, simplifies existing exception under streetscapes)

D. Landscaping Standards.

~~1. Landscaping required pursuant to this section and each zoning district is applicable to all land developments, permits, or land use activities.~~

2. ~~The proponent or applicant of a landscape plan review shall reimburse the city for the costs of any professional consultants hired by the city to review any landscape plan. These professional services may include, but shall not be limited to, engineering, legal, financial and accounting services. The proponent or applicant shall submit a base deposit as established by city to cover anticipated costs of retaining professional consultants. Additional amounts shall be deposited at the request of the city if the cost is over and above the deposit amount.~~

3. ~~Failure to complete all of the required landscaping shall be cause for nonissuance of the certificate of occupancy; provided, the applicant may obtain a financial guarantee under subsection (N) of this section to complete the required landscaping or any part of it within 90 days of temporary or final building occupancy.~~

4. ~~It shall be the responsibility of the project manager or business owner to contact the senior planner upon completion of the landscaping work and request an inspection. The senior planner shall be provided nursery receipts to confirm species and quantities of plants planted prior to inspection.~~

#### 5. General Provision.

a. Where any commercial or industrial structure is enlarged or expanded, then landscaping shall be provided for said expansion or enlargement in accordance with this section. A change in use in an existing commercial or industrial structure may require additional landscaping as set forth in this section.

b. If the development proposal is a structure remodel or exterior tenant improvement, and the parking area is not required to be reconfigured or expanded, the following standards apply:

i. Perimeter landscaping and parking area landscaping is only required pursuant to Chapter 18.95 EMC, Design Standards.

c. If the development proposal is a commercial or industrial use with a new structure, structure remodel, or a major ~~exterior~~ tenant improvement, ~~then the parking area shall be reconfigured to match the proposed use and the following standards apply:~~

i. Perimeter landscaping is required pursuant to subsection (D)(5)(a) of this section.

ii. Parking area landscaping is required pursuant to subsection (D)(6) of this section.

~~d. If the development proposal is for a new commercial or industrial structure, the following standards shall apply:~~

~~i. Perimeter landscaping is required pursuant to subsection (D)(5)(a) of this section.~~

~~ii. Parking area landscaping is required pursuant to subsection (D)(6) of this section.~~

6. All parking areas of over 20,000 square feet shall have a minimum of 10 percent of the total parking area, drive aisles, maneuvering area and loading space landscaped as a means to reduce the barren appearance of the lot and to reduce the amount of stormwater runoff. Landscaping shall incorporate LID systems to the maximum extent feasible ~~(per Minimum Requirement No. 5 of the PCM). Perimeter landscaping, Where already~~ required adjacent to property lines, perimeter landscaping shall not be calculated as part of the 10 percent figure.

7. All ingress or egress driveways and easements which provide access corridors to the subject lot, and which are not adjacent to a public right-of-way, shall be considered the same as a public right-of-way for landscaping purposes. ~~Landscaping requirements for driveways and easement corridors shall be the same as those required adjacent to public rights of way.~~

8. All outside storage areas shall be screened by fencing and landscaping. This screen shall ~~include~~ encompass a minimum five-foot ~~buffer~~ radius around the storage area, unless it is determined ~~through~~ by development plan review that such screening is not necessary because stored materials are not visually obtrusive.

9. All trash containers shall be screened from abutting properties and streets by a 100 percent sight-obscuring fence or wall and appropriate landscaping.

10. Where a fire hydrant is located, shrubs placed within 10 feet must not exceed 18 inches in height when mature~~or less must be placed a minimum of five feet away from the hydrant. Shrubs or trees larger than 18-inches in height must be placed a minimum of 10 feet away from a hydrant.~~

11. Any 100 percent sight-obscuring fences shall have landscaping as required by this chapter placed outside of it (i.e. viewable by the public), unless it is determined by the community development department that such an arrangement would be detrimental to the stated purpose of this chapter.

12. All portions of a lot not devoted to a building, parking, storage or accessory uses shall be landscaped in a manner appropriate to the stated purpose of this chapter.

13. All required landscaping areas shall extend to the curb line or the property line.

14. Landscaping shall not conflict with the safety of those using adjacent sidewalks or with traffic safety. Safety features of landscaping shall be discussed at the time of development plan review, if necessary.

15. Quantity, arrangement and types of plants installed shall be appropriate to the size of the required landscape area and purpose of planting area as noted in this section.

16. Landscape plans shall include LID systems to the maximum extent feasible (~~per Minimum Requirement No. 5 of the PCM~~) and a diversity of native plant species which promote native wildlife habitat.

17. ~~Landscaping adjacent to required b~~Biofiltration systems with slopes that does not exceed 3:1 (H:V) slope may be integrated into~~considered part of~~ any required landscaping areas, subject to approval by the community development director or designee. Landscaping permitted within the treatment area of a biofiltration system or other LID system shall meet planting and maintenance standards outlined in the Public Works Standards~~PCM and associated reference documents. The chosen vegetation shall not result in any disruption of the system's functions at any time.~~

18. Landscaping buffers shall be required adjacent to any open or above ground stormwater facilities, as required in the city's ~~construction~~Public Works sStandards, subject to the approval of the community development director or designee. The configuration and plant species of landscape areas on a site shall be designed as not to disrupt the functions of stormwater systems.

19. Use of manmade nonvegetative material, such as plastic or artificial plants or grass, is prohibited as substitute for the required landscaping. Nonvegetative material is not a substitute for plant material. Nonporous weed barriers are prohibited in landscaped areas. Bark, mulch, rock or other nonvegetative material shall only be used in conjunction with landscaping to assist vegetative growth and maintenance or to visually complement plant material.

20. Required landscape areas shall be provided with adequate drainage to prevent ponding, erosion of mulch or soil, and excessive water retention detrimental to plant health. Ponding is permitted in an LID system, if necessary for proper operation. LID systems shall be properly maintained to prevent ponding that lasts longer than recommended in the Public Works Standards~~PCM and associated reference documents.~~

21. All trees shall be triple-staked for the first two years.

22. Slopes within landscaped areas shall not exceed 1v:3h, in order to decrease erosion potential and assist in ease of maintenance.

23. Landscaping shall be provided along access points or circulation routes in conformance with Chapter 13.05 EMC, Site Development Regulations.

E. Plant Standards. Where new landscaping is required, the following plant standards apply:

1. Deciduous Tree. A minimum of two inches diameter at three feet above grade at the time of planting.
  2. Evergreen Tree. A minimum six feet in height above grade at the time of planting.
  3. Low Shrub. Plants shall be a minimum of eighteen inches in height at the time of planting with approximately a two-gallon pot or ball-and-burlap.
  4. Medium Shrub. Plants shall be a minimum of three feet in height at the time of planting with approximately a five-gallon pot or ball-and-burlap.
  5. Ornamental Tree. A minimum of three feet above grade. Ornamental trees may count as medium shrubs, but do not count for trees otherwise required.
  6. Vegetative Groundcover. Grass sod, or spreading groundcover in four-inch pots with a maximum spacing of 12 inches, or one-gallon pots with a maximum spacing of 24 inches at the time of planting of sufficient size, spacing and type as to spread to form a solid cover over the planting area within two years from the time of planting.
  7. The use of native and drought tolerant, low water use plants shall be encouraged.
  8. Refer to the Public Works Standards ~~PCM and associated reference documents~~ for plant lists and planting and maintenance standards for LID systems.
- F. Irrigation Standards. The intent of this standard is to ensure that plants will survive the critical establishment period when they are most vulnerable to lack of watering and to survive periods of extended drought once they are established.
1. When irrigation systems are incorporated into a landscaping area, the applicant shall prepare a water use and conservation plan for review and approval by the community development director or designee.
  2. The applicant shall choose one of the following options to provide all landscaped areas with an irrigation method:
    - a. A permanent underground irrigation method with an automatic controller plus an overriding rain switch. All landscape that is placed in median stripes in the middle of street rights-of-way shall be irrigated with underground automated irrigation systems; or
    - b. An irrigation method which provides sufficient water to ensure that the plants will become established. The method shall be required to be permanent unless the plant materials selected are determined to be drought tolerant by the community development department, in which case irrigation standards shall be required only during the first growing season following installation. Even if drought tolerant plants are used in the landscape design, there must be an identified method to easily provide water to the plants in the case of a drought. Any automatic/mechanical system designed under this option shall be fitted with an overriding rain switch.
- G. Landscaping Types. The landscaping types are intended to provide a basic list of landscaping standards that may be applied within a proposed project as necessary to provide for the intent of the comprehensive plan.
1. Type I, Vegetative Buffer. A combination of landscaping, evergreen/deciduous trees, and fencing that provides a substantial visual block between uses and creates an impression of separation of spaces along an interior property line. The following standards shall be applied:
    - a. Landscaping strip shall be a minimum 15 feet in width as required by subsection (H) of this section, Landscaping Regulations by Zoning District;
    - b. Depending on the use, a sight obscuring barrier may be required to be placed within the landscaping strip to consist of:

- i. Fence/wall four feet in height; or
  - ii. Medium shrub barrier (hedge) which is such a density as to provide a solid visual barrier;
  - c. One evergreen or deciduous tree is required per 20 linear feet of landscaping strip. Trees shall be spaced at intervals not greater than 20 feet on center along the full extent of the landscaping strip. No more than 60 percent of the trees may be deciduous;
  - d. The percentage of evergreen trees allowed may be further reduced at the discretion of the community development director or designee to address public safety concerns;
  - e. Shrubs.
    - i. Two medium evergreen/deciduous shrubs are required per four linear feet of landscaping strip and placed no greater than four feet on center; and
    - ii. Three low evergreen/deciduous shrubs are required per three linear feet of landscaping strip and placed no greater than three feet on center;
    - iii. Shrubs shall be placed along the entire length of the landscaping strip as to provide a vegetative barrier;
    - iv. No more than 60 percent of the shrubs may be deciduous;
  - f. Vegetative groundcover;
  - g. Landscaping shall be placed along the entire length of the landscaping strip so as to provide a vegetative buffer. These standards are minimum; additional landscaping may be required if, in the determination of the community development director or designee, the proposed landscaping plan does not provide effective separation;
  - h. Landscaping shall incorporate LID systems to the maximum extent feasible (~~per Minimum Requirement No. 5 of the PCM~~), with design, installation, and maintenance following standards outlined in the Public Works Standards ~~PCM and associated reference documents.~~
2. Type II, Streetscapes. A unifying theme of canopy type trees along a public or private street with a landscaping strip, located consistent with the Public Works Standards adopted under EMC 12.02.030 ~~and sidewalk~~. The following standards shall be applied:
- a. ~~Curb, gutter, and sidewalk/trail;~~
  - ~~b. Landscaping strip of vegetative groundcover a minimum of five feet in width, which shall be increased to 15 feet in width where retail buildings are connected, located between the curb and the sidewalk;~~
  - b. Shrubs shall be placed within the landscaping strip so as to cover 30 percent of the strip, with a maximum bush height of three feet, and provide year-round screening;
  - c. Deciduous street trees are required along the entire street frontage at a spacing of 40 feet on center or as required to continue the existing pattern of street, whichever is less distance; and
    - i. When located on either side of the sidewalk, trees shall be centered on the landscaping strip, or
    - ii. When located within a sidewalk eight-feet or greater in width ~~d. Tree wells, minimum~~ four-foot in diameter tree wells, circle in shape, with decorative 5-foot-square grates are required ~~when trees are placed within the sidewalk. Trees not located on the sidewalk shall be centered on the landscaping strip;~~



- ~~e. All utilities Level 1 shall be placed underground as appropriate;~~
- ~~f. Street lights as directed by the community development director or designee;~~
- ~~g. Landscaped medians within the roadway may be required at the discretion of the community development director or designee to provide for pedestrian refuge;~~
- ~~i. Curb, gutter, and four to 12 foot wide landscaping strip within the roadway with a length determined by the community development director or designee;~~
- ~~ii. One street tree at each end of the median, plus one street tree per 30 feet of median;~~
- ~~iii. Vegetative groundcover;~~
- ~~iv. Shrubs shall be placed within the landscaping strip so as to cover 30 percent of the strip, with a maximum bush height of three feet, and provide year round screening;~~
- ~~h. Bus stop(s), benches and/or bus shelter(s) as deemed necessary by Pierce Transit and the city;~~
- ~~di. Landscaping shall incorporate LID systems (per Minimum Requirement No. 5 of the PCM), with design, installation, and maintenance following standards outlined in the Public Works Standards PCM and associated reference documents.~~
- e. Additional standards abutting arterials and collectors in the TC, C, BP and MUR zoning districts.
- i. In addition to all other landscaping required in this section, the total landscaped area between the building facade and the curb shall be:
- (A) five (5) percent minimum, or
- (B) ten (10) percent minimum in the BP zoning district.
- ii. Landscaping may be planted within planting areas surrounding trees, in raised planters, and on vegetative walls mounted to the ground-level building facade.
- iii. Where a building or portion of a building is located more than 10 feet from a public sidewalk or usable public space, all area between the building and the public sidewalk that is not used for vehicle or pedestrian access, circulation, parking or seating shall be landscaped.
- iv. Potted landscape material may be substituted for required landscaping in areas designed for outdoor eating with the approval of the department.
3. Type III, Parking Areas. At least five percent of the interior parking area shall have landscaping to break up the bulk of a parking area. The following standards shall be applied ~~(internal circulation of pedestrians, including bricking and paving of walkways):~~
- a. Landscaping Islands. Landscaped islands shall be located at the end of each parking row. Internal landscaping islands shall occur at intervals within the row so that no parking stall within that parking row is more than 10 parking stalls or 90 feet, whichever is less, from a landscaped island. The following standards shall apply:
- i. The length of the island shall be the same depth of the parking stalls and a minimum five feet in width;
- ii. Curbed;
- iii. Contain one street tree per 15 linear feet;



- iv. One medium shrub or two small shrubs per 12 square feet of island;
- v. Vegetative groundcover.
- b. If internal landscaping other than landscaping islands is included in a parking area, the internal landscaping shall consist of vegetative groundcover and shrubs.
- c. Landscaping around the perimeter of the parking area shall be a Type I, vegetative buffer.
- d. Landscaping shall incorporate LID systems to the maximum extent feasible ~~(per Minimum Requirement No. 5 of the PCM)~~, with design, installation, and maintenance following standards outlined in the Public Works Standards ~~PCM and associated reference documents.~~
4. Type IV, Solid Barrier. A combination of fencing and landscaping which is intended to provide a solid sight barrier between uses to create a strong impression of spatial separation. The following standards shall be applied:
- a. Landscaping strip minimum 10 feet in width.
- b. Solid fence or wall six feet in height located within the landscape strip.
- c. The community development director or designee may direct the location, style, and construction materials of the required fence/wall to lessen visual impact on adjacent properties.
- d. One deciduous or evergreen tree is required per 20 linear feet of landscaping strip. Trees shall be spaced at intervals not greater than 20 feet on center along the full extent of the landscaping strip. No more than 50 percent of the trees may be deciduous;
- e. The percentage of evergreen trees allowed may be further reduced at the discretion of the community development director or designee to address public safety concerns;
- f. Shrubs.
- i. Two medium evergreen/deciduous shrubs are required per four linear feet of landscaping strip and placed no greater than five feet on center; and
- ii. Three low evergreen/deciduous shrubs are required per four linear feet of landscaping strip and placed no greater than four feet on center;
- g. Vegetative groundcover;
- h. Landscaping shall be placed along the entire length of the landscaping strip so as to provide a vegetative barrier. These standards are minimum; additional landscaping may be required if, in the determination of the community development director or designee, the proposed landscaping plan does not provide an actual or effective barrier or separation;
- i. Landscaping shall incorporate LID systems to the maximum extent feasible ~~(per Minimum Requirement No. 5 of the PCM)~~, with design, installation, and maintenance following standards outlined in the Public Works Standards ~~PCM and associated reference documents.~~
5. Type V, Area Screening. A combination of fencing/wall and landscaping that provides visual relief from dumpsters, recycling areas, or small storage yards, of less than 150 square feet in size. The following standards shall be applied:
- a. Landscaping strip a minimum five feet in width around the area, excluding access points;

- b. Solid fence or wall six feet in height located on the interior of the landscaping strip; Arborvitae trees at four feet on center.
- c. Shrubs.
  - i. One medium evergreen/deciduous shrub per four linear feet of landscaping strip and placed no more than four feet on center;
  - ii. One small evergreen/deciduous shrub per four linear feet of landscaping strip and placed no more than four feet on center; and
  - iii. Shrubs shall be spaced at intervals along the full extent of the landscaping strip;
  - iv. Vegetative groundcover;
  - v. No more than 60 percent of the shrubs may be deciduous.

#### H. Landscaping Regulations by Zoning Districts.

1. Type II, streetscapes, shall apply to all arterial and collector streets abutting zones ~~and shall be applied to all proposed developments, and all proposed streets within proposed developments, except residential detached dwellings.~~
2. Type III, parking areas; and Type V, area screening, are types of landscaping that shall apply in all zones.
3. Public Spaces in the TC, C, BP and MUR zoning districts. A minimum of 15 percent of the total area of a public space, such as a courtyard or plaza, shall be landscaped.
4. Discretionary land use permits may utilize any landscaping type in order to appropriately mitigate the impacts of the proposed use.
5. The following standards are representative and may not include all uses or types. Where individual uses or zones are not specified, the community development director or designee shall make a determination as to the most appropriate landscaping type in order to mitigate the impacts of the proposed development. LID systems shall be installed to the maximum extent feasible ~~(per Minimum Requirement No. 5 of the PCM).~~

| Zones                                                 |                   | Minimum Landscaping Requirements                   |
|-------------------------------------------------------|-------------------|----------------------------------------------------|
| 1. R-1/R-2 (Residential) zones that abut:             |                   |                                                    |
|                                                       | Residential zones | Exempt from perimeter landscaping standards        |
|                                                       | All other zones   | Type I, vegetative buffer, 10-foot landscape strip |
| 2. MR-1 (Mixed Residential Low) zone that abut:       |                   |                                                    |
|                                                       | Residential zones | Type I, vegetative buffer, 10-foot landscape strip |
|                                                       | Public zones      | Type I, vegetative buffer, 15-foot landscape strip |
| 3. MR-2 (Mixed Residential Moderate) zones that abut: |                   |                                                    |
|                                                       | Residential zones | Type IV, solid barrier, 15-foot landscape strip    |
|                                                       | All other zones   | Type IV, solid barrier, 15-foot landscape strip    |
| 4. MUR (Mixed Use Residential) zone that abut:        |                   |                                                    |
|                                                       | Residential zones | Type IV, solid barrier, 20-foot landscape strip    |
|                                                       | Public zones      | Type IV, solid barrier, 10-foot landscape strip    |

|                                              |                             |                                                                   |
|----------------------------------------------|-----------------------------|-------------------------------------------------------------------|
|                                              | All other zones             | Type I, vegetative buffer, 15-foot landscape strip                |
| 5. TC (Town Center) zones that abut:         |                             |                                                                   |
|                                              | Residential zones           | Type IV, solid barrier, 15-foot landscape strip                   |
|                                              | All other zones             | Type I, vegetative buffer, 15-foot landscape strip                |
| 6. C (Commercial) zones that abut:           |                             |                                                                   |
|                                              | Residential zones           | Type IV, solid barrier, 15-foot landscape strip                   |
|                                              | All other zones             | Type I, vegetative buffer, 15-foot landscape strip                |
| 7. BP (Business Park) zones that abut:       |                             |                                                                   |
|                                              | Residential zones           | Type IV, solid barrier, 25-foot landscape strip                   |
|                                              | All other zones             | Type I, vegetative buffer, 15-foot landscape strip                |
| 8. I (Industrial) zones that abut:           |                             |                                                                   |
|                                              | Residential zones           | Type IV, solid barrier, 25-foot landscape strip                   |
| 9. P (Public) zones that abut:               |                             |                                                                   |
|                                              | Residential zones           | Type IV, solid barrier, 20-foot landscape strip                   |
|                                              | All other zones             | Type I, vegetative buffer, 15-foot landscape strip                |
| 10. Parking lots within the following zones: |                             |                                                                   |
|                                              | Commercial                  | Type I, vegetative buffer and Type III, parking areas             |
|                                              | Industrial                  | Type I, vegetative buffer and Type III, parking areas             |
| 11. Storage space:                           |                             |                                                                   |
|                                              | Under 150 gross square feet | Type V, area screening                                            |
|                                              | Over 150 gross square feet  | Type IV, solid barrier                                            |
|                                              | Industrial and outdoor      | Type IV, solid barrier                                            |
|                                              | Substation                  | Type IV, solid barrier                                            |
| 12. Wireless telecommunications facilities   |                             |                                                                   |
|                                              |                             | See EMC § 18.100.110, Personal wireless communications facilities |

- 1
- 2 I. In addition to the requirements of this section, Chapter 18.95 EMC, Design Standards, promotes connectivity
- 3 between landscape improvements and adjacent sites and buildings.
- 4 J. All street trees shall meet the following standards:
- 5     1. A minimum of two inches diameter at three feet above grade at the time of planting.
- 6     2. Street trees shall be located and placed within the street right-of-way in accordance with the requirements of
- 7     the community development director or designee, unless otherwise permitted in this section.
- 8     3. Street trees may be planted within 10 feet of the right-of-way only if the right-of-way is insufficient to
- 9     accommodate street trees, or if curbs, gutters and sidewalks already exist.

4. The adjoining property owner shall be responsible for all maintenance of street trees and landscaping in public right-of-way.

5. Street trees shall be trimmed to maintain the street canopy and provide for public safety. Street trees cannot be removed without the prior approval of the community development director or designee.

6. Trees planted within five feet of a public or private road pavement edge, curbing, LID system underdrain, or sidewalk, or any trees within parking areas, shall be surrounded by a root control barrier. Root control barriers shall consist of plastic sheets extending a minimum of two feet below the finished grade of the surrounding surface.

7. All trees shall be triple-staked for the first two years.

8. All street trees shall be of a species approved by the community development department.

9. Street trees shall be incorporated into any LID system designs to the maximum extent practicable.

K. The community development director or designee shall review and may approve, approve with modifications, or disapprove the landscape development plans subject to the provisions of this section. The following plans are required and provide standards for the maintenance and enhancement of natural vegetation in the city:

1. Irrigation Plan.

a. All proposed multifamily or nonresidential developments require an irrigation plan. An irrigation plan is required to ensure that the planting will be watered at a sufficient level to ensure plant survival and healthy growth. The irrigation plan shall indicate the location of pipes, sprinkler heads, and backflow devices. The community development director or designee may require additional information, including, but not limited to, pumps, pipe size, head capacity, water pressure in pounds per square inch at the pump and sprinkler heads, and timer system. The irrigation plan shall conform to the requirements of this section.

b. The irrigation plan shall be prepared by a Washington State registered landscape architect, a Washington State certified nurseryman, or a Washington State certified landscaper, except irrigation plans for short plats and for street tree requirements, which may be prepared by the applicant. Where the required landscaping is less than 200 gross square feet in area, the plan may be prepared by a lay person. However, if the community development director or designee determines that the quality of the plan is not sufficient, the community development director or designee may require that the plan be developed in accordance with this section.

c. Irrigation shall be permanent unless the plant materials selected are determined to be drought tolerant; in which case, irrigation shall be required until the plants are fully established, and there shall be an identified method to easily provide water to the plants in the case of a prolonged drought.

2. Tree Retention Plan (see EMC § 18.90.180, Tree preservation).

a. Landscape Plan. Significant tree retention plans (see EMC § 18.90.180, Tree preservation) and landscape plans shall be submitted to the community development department for any development action or land use permit. The plans shall be submitted according to the requirements of the application form provided by the community development department.

3. Landscape Plan.

a. The landscape plans shall be prepared by a Washington State registered landscape architect, a Washington State certified nurseryman, or a Washington State certified landscaper, except street tree requirements and canopy tree requirements for properties abutting vacant land may be prepared by the applicant, as approved by the community development director or designee.

b. A building permit or zoning approval shall not be issued until the landscaping plan has been approved.

c. At the time of the preapplication conference, the community development department staff shall review specific landscape requirements with the applicant or his/her representative.

L. Water Conservation and Plant Materials. The following guidelines are required to reduce the maintenance cost of a development, enhance the long-term health of plant material and reduce the cost of watering. The intent of this code is to ensure that costly plant material is provided with the opportunity to take the most advantage of natural watering, and therefore reducing the amount of water required to maintain plant material health during the dry season. The intent of this section is to encourage the use of plants native to the Pacific Northwest and introduced plants common to the Pacific Northwest, in that order, to maximize use of rainwater, to reduce general maintenance needs and to encourage the development of landscape designs reflective of our natural surroundings. It is also the intent of this section to encourage the use of drought tolerant plants in landscape designs in order to reduce the amount of water devoted to outdoor watering at a time when population pressures are increasing faster than the water supply.

1. Water conservation measures shall be employed in the following manner:

a. Consistent with Chapter 13.05 EMC, applicants are required to implement LID to the maximum extent feasible ~~(per Minimum Requirement No. 5 of the PCM)~~. Refer to the Public Works Standards PCM and associated guidance documents for suggested design standards.

b. Landscape area should be deep-tilled to a depth of at least 12 inches to facilitate deep-water penetration and soil oxygenation. Use of soil amendments is required to improve water drainage, moisture penetration or water-holding capacity. For all newly landscaped areas organic matter should be incorporated to a depth of four to six inches to facilitate deep water penetration and soil oxygenation.

c. Mulch should be applied regularly to, and maintained in, all planting areas to assist soils in retaining moisture, reducing weed growth and minimizing erosion. Mulches include organic materials such as wood chips and shredded bark. Nonporous materials, such as plastic sheeting, are prohibited from use as a ground cover. Nonporous materials may be used as liners in LID systems, where appropriate. Mulches should be applied to the following depths: three inches over bare soil and two inches where plant materials will cover.

d. Applicants are strongly encouraged to utilize drought tolerant plant material native to Western Washington and introduced noninvasive plants common to the area that are well suited to the wet/dry climate of the Puget Sound.

M. Maintenance. The following standards shall be followed for the maintenance of ~~on site~~all landscaping required pursuant to this section~~and landscaping on adjacent public right of way~~:

1. Failure to complete all of the required landscaping shall be cause for nonissuance of the certificate of occupancy; provided, the applicant may obtain a financial guarantee under subsection (N) of this section to complete the required landscaping or any part of it within 90 days of temporary or final building occupancy.

2. It shall be the responsibility of the project manager or business owner to contact the community development department upon completion of the landscaping work and request an inspection.

~~3. Whenever landscaping is required in accordance with the provisions of this title or any addition or amendments to this title, or in accordance with the provisions of any previous code or ordinance of the city, the~~  
Landscaping shall be permanently maintained in such a manner as to accomplish the purpose for which it was ~~initially~~originally required.

4. The community development department may inspect the landscaping upon request of the project manager or business owner or at any time after the three-month expiration date.

5. Any installed plant material that dies shall be replaced within the spring or fall growing season following plant loss, but not to exceed three months from the time of loss. This standard applies for the life of the project.

6. Regardless of whether the landscaping existed prior to the effective date of this code or was added thereafter, replacement landscaping shall comply with all provisions of this section.

7. All landscape materials shall be pruned and trimmed as necessary to maintain a healthy growing condition, to prevent primary limb failure, and to prevent limbs from becoming an impediment or hazard to vehicles or pedestrian traffic.

8. All landscape areas shall be kept free of trash and weeds and all irrigation systems shall be properly maintained by the property owner to ensure the function of the requirements of this code.

9. Failure to maintain all of the required landscaping or any part of it shall constitute a zoning violation.

10. LID systems shall be maintained by the property owner according to maintenance standards included in the Public Works Standards ~~PCM and associated guidance documents~~ to prevent impediments and hazards to vehicles and/or pedestrian traffic.

N. Bonding. In order to guarantee performance of the landscaping requirements, cash bonds or other appropriate security (including letters of credit) in the amount of 125 percent of the estimated cost of the required landscaping shall be required if landscaping is not installed prior to issuance of occupancy permits. The cash bonds or other appropriate security shall be forfeitable by the city if the work is not completed within 90 days of the date of posting of the cash bonds or other appropriate security, or upon such other date as agreed to between the city and the property owner or authorized person acting on the property owner's behalf. In the case where such a cash bond(s) or other appropriate security is forfeited to the city, the proceeds therefrom shall be used by the city to effectuate the landscaping requirements, which were not so completed. Along with the requirement for the cash bond(s) or other appropriate security, the property owner, or authorized person acting on the property owner's behalf, shall agree and consent to entry upon the property by the city or its agents or representatives, in the event of bond forfeiture, and completion of the landscaping requirements by the city or its agents or representatives.

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