

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist

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

Instructions for applicants

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

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

Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals

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

A. Background [Find help answering background questions](#)

1. Name of proposed project, if applicable:

Critical Area Ordinance Update for Critical Aquifer Recharge Areas (CARAs)

2. Name of applicant:

City of Edmonds

3. Address and phone number of applicant and contact person:

Mike Clugston, Acting Planning Manager
City of Edmonds Planning Division
121 5th Ave. N
Edmonds, WA 98020

4. Date checklist prepared:

November 9, 2023

5. Agency requesting checklist:

City of Edmonds

6. Proposed timing or schedule (including phasing, if applicable):

The Edmonds City Council is expected to consider the adoption of new critical aquifer recharge regulations in early 2024.

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

Critical area regulations must be updated at regular intervals consistent with state law.

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

- Olympic View Water and Sewer District Wellhead Protection Area Delineation – Deer Creek Springs and 228th Street Wellfield (August 2018)
- Washington State Wellhead Protection Program Guidance Document (DOH 331-018, January 2017)
- Critical Aquifer Recharge Area Guidance, Department of Ecology Publication 05-10-028 (March 2021)
- Critical Areas Handbook v3.0, Department of Commerce (2023)

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

We do not know of other pending proposals that affect the same geographic area requiring concurrent evaluation.

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

The proposed critical area regulations need the following approvals:

- Review of this checklist and issuance of a threshold determination under the State Environmental Policy Act for non-project actions; and
- Adoption by the Edmonds City Council;

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

The City of Edmonds completed a comprehensive review of its critical area ordinance (CAO) as required by the Growth Management Act in May 2016 with the adoption of Ordinance No. 4026. At that time, there were no known critical aquifer recharge areas in Edmonds and hence no substantive regulations in the Edmonds Community Development Code to protect such areas.

In 2022, Edmonds became aware of the presence of CARAs within the City's jurisdiction when the Olympic View Water and Sewer District (OVWSD) appealed the City's SEPA Determination of Nonsignificance (DNS) for a stormwater code update. While OVWSD's appeal was denied by the hearing examiner, staff committed to updating its code to reflect the presence of CARAs within city boundaries. OVWSD provided mapping of their wellhead protection areas to the City, which were added to the City's geographic information system (GIS). This code update is a follow-up to that work and would establish local regulations for those areas consistent with the GMA in RCW 36.70A.020 and RCW 36.70.330.

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

The critical aquifer recharge area regulations would apply within the mapped wellhead protection areas and buffers of the Olympic View Water and Sewer District's Deer Creek Springs and 228th Street wellheads. The Deer Creek wellhead is in the adjacent Town of Woodway while most of the wellhead protection area and buffer are in the City of Edmonds. The 228th Street wellhead is located in Esperance,

a portion of unincorporated Snohomish County that is within Edmonds's designated Urban Growth Area. A portion of the wellhead protection area and buffer of the 228th Street wellhead are located in Edmonds.

B. Environmental Elements

1. Earth [Find help answering earth questions](#)

a. General description of the site:

The City of Edmonds is located in south Snohomish County on the western shores of Puget Sound approximately 14 miles north of Seattle. Situated within the urbanized Puget Sound region, the city encompasses approximately 8.9 square miles (5,700 acres) in area, including 5 lineal miles (26,240 feet) of marine shoreline. Roughly triangular in shape, the city is bounded by Puget Sound on the west; Lynnwood and Mountlake Terrace on the east; unincorporated Snohomish County on the north; and the town of Woodway, unincorporated Snohomish County (the Esperance area), and King County on the south. The area that would be covered by the proposal is that portion of the City of Edmonds shown within the attached wellhead protection area and buffer maps.

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

Topography varies throughout the City of Edmonds.

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

Greater than 40%.

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

| <u>Hydrostratigraphic Unit</u> | <u>Hydrogeologic Classification</u> | <u>Unit Description</u> |
|----------------------------------|---|--|
| Younger Alluvium (Qyal) | Aquifer (when in direct contact with Qva) | Fluvial sands and gravels with lesser organic material. Thin and limited lateral extent. For modeling purposes, this unit is grouped with the Qva aquifer when it is in direct contact with Qva materials. |
| Vashon Recessional Outwash (Qvr) | Aquifer (when in direct contact with Qva) | Sands and gravels with lesser clay and silt. For modeling purposes, this unit is grouped with the Qva aquifer when it is in direct contact with Qva materials. |
| Vashon Till (Qvt) | Confining Unit | Dense, unsorted clay-through gravel- and cobble-size material. This is the most extensive surficial deposit in the study area. It |

| | | |
|------------------------------|----------------|--|
| | | has a low permeability, is upwards of 100 feet thick, and forms a protective cap over the Qva aquifer. |
| Vashon Advance Outwash (Qva) | Aquifer | Sands with lesser gravel. Laterally extensive across the study area with thicknesses ranging from 100 to 150 feet. This unit is partially saturated and considered an unconfined aquifer system. |
| Transitional Beds (Qtb) | Confining Unit | Low permeability sequence of layered clay-through fine sand-size material. This unit is relatively thick across the model area and forms the base of the model. |

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

There are no known unstable soils within the CARAs.

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

The proposal is a non-project, non-site-specific action which will not require grading.

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

The proposal is a non-project, non-site-specific action which will not cause erosion.

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

The proposal is a non-project, non-site-specific action which will not create new impervious surfaces.

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

The proposal is a non-project, non-site-specific action which will not cause erosion and, consequently, will not require erosion and sediment control.

2. Air [Find help answering air questions](#)

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

The proposal is a non-project, non-site-specific action which will not create air emissions.

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

The proposal is a non-project, non-site-specific action which will not be affected by any off-site emissions or odors.

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

The proposal is a non-project, non-site-specific action which will not lead to air impacts.

3. Water [Find help answering water questions](#)

a. Surface Water: [Find help answering surface water questions](#)

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

The Deer Creek CARA includes Deer Creek Springs and Deer Creek in the Town of Woodway, which flows into Puget Sound. Several small wetlands exist near the Madrona K-8 School, which are located within the Deer Creek CARA buffer. The 228th Street CARA includes Halls Creek at the easternmost extent of the CARA buffer, which flows into Lake Ballinger (not in the CARA).

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

The proposal is a non-project, non-site-specific action which will not require work near water.

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

The proposal is a non-project, non-site-specific action which does not involve any fill or dredge.

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

The proposal is a non-project, non-site-specific action which does not propose surface water withdrawals or diversions.

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

No portion of a 100-year floodplain in Edmonds is within either the Deer Creek or 228th Street CARAs. The 228th Street CARA buffer overlaps a portion of the Halls Creek floodplain north of Lake Ballinger within the City of Mountlake Terrace.

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

The proposal is a non-project, non-site-specific action. The purpose of the new regulations is to establish CARAs together with groundwater protection standards to help protect aquifers from degradation and depletion to minimize loss of recharge quantity, to help protect supply wells for public drinking water,

and to help prevent contamination of groundwater as much as is currently feasible.

b. Ground Water: [Find help answering ground water questions](#)

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

The proposal is a non-project, non-site-specific action that would not withdraw groundwater.

Olympic View Water and Sewer District has two existing drinking water wells in/near Edmonds – Deer Creek Springs and 228th Street. No change to the District's wells would result from the updated CARA regulations, except to the extent that the proposal's regulations would protect those wells.

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

The proposal is a non-project, non-site-specific action that would not discharge waste material.

There are no industrial or agricultural land uses within either CARA. It is unknown whether there are any remaining residential septic systems in the CARAs but the majority of both areas are served by public wastewater systems operated by the City of Edmonds or Olympic View.

c. Water Runoff (including stormwater):

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

The source of the runoff will not change with this proposal. Runoff comes from precipitation falling on existing surfaces and being conveyed to existing on-site stormwater management systems or, where properties are connected, to the City's existing stormwater management system. New hard surfaces will be managed per item 4 below.

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

The risk of waste materials entering ground or surface waters will not change with this proposal, except to the extent that the proposal reduces the likelihood of waste materials entering ground or surface waters. The land use restrictions in the proposed CARA, as well as managing the surface water runoff per item 4 below, are designed to help reduce the likelihood of waste material entering ground or surface waters.

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

This proposal will not alter or change drainage patterns, except to the extent that the proposal reduces

the likelihood of drainage entering ground or surface waters.

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

The City will continue to enforce the provisions of its stormwater discharge permit issued by the Department of Ecology (*Western Washington Phase II Municipal Permit*) and associated vetted documents such as the 2019 *Stormwater Management Manual for Western Washington* to reduce or control surface, ground, and runoff water, and drainage pattern impacts. The City will maintain compliance with any future permits requirements and use future vetted documents to reduce or control surface, ground, and runoff water, and drainage pattern impacts.

4. Plants [Find help answering plants questions](#)

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

- ☒ deciduous tree: alder, maple, aspen, other
- ☒ evergreen tree: fir, cedar, pine, other
- ☒ shrubs
- ☒ grass
- ☐ pasture
- ☐ crop or grain
- ☐ orchards, vineyards, or other permanent crops.
- ☒ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- ☐ water plants: water lily, eelgrass, milfoil, other
- ☐ other types of vegetation

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

The proposal is a non-project, non-site-specific action which will not lead to alteration of plants and vegetation.

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

No threatened or endangered plant species are known to be located within the City of Edmonds. Washington State Department of Natural Resources Natural Heritage site data do not show any rare, threatened, or endangered plant species in the City of Edmonds.

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

The proposal is a non-project, non-site-specific action which is not related to plants and vegetation.

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

This is a not a site specific project; however, it is assumed that some noxious/invasive plants listed on the Snohomish County noxious weed list exist within the City of Edmonds.

5. Animals [Find help answering animal questions](#)

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

Examples include:

- **Birds:** hawk, heron, eagle, songbirds, other:
- **Mammals:** deer, bear, elk, beaver, other:
- **Fish:** bass, salmon, trout, herring, shellfish, other:

The proposal is a non-project, non-site-specific action. However, numerous fish and wildlife species depend on the Edmonds shoreline and adjacent shoreland habitats for either part or all of a life stage.

Shellfish resources include clams, mussels, crab, and shrimp. Eight species of salmonids use nearshore areas of Puget Sound at some point in their life cycle. These include Chinook, chum, coho, sockeye, and pink salmon and sea-run cutthroat, steelhead, and bull trout. Birds with priority habitats that occur within the City include bald eagle, purple martin, and great blue heron.

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

The proposal is a non-project, non-site-specific action. However, several federally listed, threatened, or endangered species that may inhabit marine waters or adjacent habitats within the City are identified in the State database. The threatened marbled murrelet are observed intermittently in inland Puget Sound waters; winter and summer surveys by WDFW conducted near Edmonds found no murrelets in winter and only a few birds in the Edmonds area in summer. Federally listed threatened fish species that may occur in or in the vicinity of Edmonds, including Puget Sound Chinook salmon and bull trout. Federally listed marine mammals (Steller sea lion and Puget Sound orcas) may be present in the Edmonds shore zone, but are not commonly observed.

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

The shoreline of Puget Sound provides a migratory route for salmon and the City of Edmonds is located within the Pacific Flyway, which is a flight corridor for migrating waterfowl and other birds.

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

The proposal is a non-project, non-site-specific action which does not require measures to preserve or enhance wildlife.

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

The proposal is a non-project, non-site-specific action which will not impact animals.

6. Energy and Natural Resources [Find help answering energy and natural resource questions](#)

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

The proposal is a non-project, non-site-specific action which is not related to energy and natural resources.

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

The proposal is a non-project, non-site-specific action which is not related to solar energy.

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

The proposal is a non-project, non-site-specific action which does not involve energy conservation.

7. Environmental Health [Find help with answering environmental health questions](#)

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

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

The proposal is a non-project, non-site-specific action which would not lead to any environmental health hazards. The proposed code includes specific protections to ensure future environmental health hazards are limited within the CARAs.

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

According to the National Pipeline Mapping System (<https://www.npms.phmsa.dot.gov/>), there are no existing hazardous liquid and gas transmission pipelines within the CARAs. The proposed code includes specific restrictions against locating future hazardous liquid pipelines within the CARAs.

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

The proposal is a non-project, non-site-specific action which would not lead to any storage of hazardous chemicals. The proposed code includes specific requirements for chemical storage and monitoring within the CARAs in the future.

c. Describe special emergency services that might be required.

The proposal is a non-project, non-site-specific action which would not lead to the need for special emergency services other than those that already exist.

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

As noted above, the proposed code includes specific protections to ensure future environmental health hazards are limited within the CARAs.

b. Noise

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

The proposal is a non-project, non-site-specific action which would not lead to noise impacts.

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

The proposal is a non-project, non-site-specific action which would not lead to noise impacts.

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

The proposal is a non-project, non-site-specific action which would not lead to noise impacts.

8. Land and Shoreline Use [Find help answering land and shoreline use questions](#)

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

Land use within the Deer Creek Springs CARA is almost entirely single family residential (RS-8 zoned, approximately 1,100 parcels), together with associated uses like schools and a cemetery. There are approximately ten parcels zoned and developed with multifamily uses and ten parcels zoned and developed with business or commercial uses. The majority of the 228th Street CARA is located in Esperance and therefore under Snohomish County's zoning jurisdiction. The portions of the 228th Street CARA in Edmonds are a mix of single family residential parcels (RS-8 zoned, approximately 130), with approximately ten multifamily zoned and developed sites. Highway 99 runs through the eastern portion of the 228th Street CARA and is zoned for and developed with commercial uses (General Commercial zone, approximately 30 parcels).

The CARA code amendment would restrict and prohibit certain higher intensity uses in order to better protect Olympic View's supply wells for public drinking water and to prevent contamination of groundwater.

- b. **Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

No.

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

No.

c. Describe any structures on the site.

Nearly all parcels are built out with single family residences and appurtenances in the Deer Creek CARA, except for the few parcels zoned and developed for business/commercial. The 228th Street CARA contains a mix of residential and commercial buildings.

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

The proposal is a non-project, non-site-specific action which would not lead to the demolition of any structures.

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

The CARA areas in Edmonds's jurisdiction are zoned mostly Single Family Residential (RS-8), with a small number of parcels zoned Multifamily Residential (RM), Neighborhood Business (BN), Westgate Mixed Use (WMU), and General Commercial (CG).

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

The CARA areas in Edmonds's jurisdiction are mostly designated Single Family Urban 1, with a small number of parcels designated Multi Family – High Density, Neighborhood Commercial, Edmonds Way Corridor, and Highway 99 Corridor.

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

The CARAs are not in the shoreline jurisdiction.

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

The critical aquifer recharge areas subject to the proposed code amendment are critical areas in accordance with Title 23 of the Edmonds Community Development Code (ECDC).

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

The proposal is a non-project, non-site-specific action which would not affect number of people living and working in the CARAs.

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

The proposal is a non-project, non-site-specific action which would not lead to displacement.

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

The proposal is a non-project, non-site-specific action which would not lead to displacement.

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

The critical area regulations are intended to protect critical areas in accordance with the Growth Management Act and through the application of best available science, as determined according to WAC 365-195-900 through 365-195-925 and RCW 36.70A.172. It is not the intent of the critical area regulations to make a parcel of property unusable by denying its owner reasonable economic use of the property nor to prevent the provision of public facilities and services necessary to support existing development.

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

The proposal is a non-project, non-site-specific action. Edmonds has no areas of agricultural or forested areas.

9. Housing [Find help answering housing questions](#)

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

The proposal is a non-project, non-site-specific action which would not impact housing.

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

The proposal is a non-project, non-site-specific action which would not impact housing.

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

The proposal is a non-project, non-site-specific action which would not impact housing.

10. Aesthetics [Find help answering aesthetics questions](#)

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

The proposal is a non-project, non-site-specific action which would not impact aesthetics.

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

The proposal is a non-project, non-site-specific action which would not impact aesthetics.

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

The proposal is a non-project, non-site-specific action which would not impact aesthetics.

11. Light and Glare [Find help answering light and glare questions](#)

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

The proposal is a non-project, non-site-specific action which would not create light or glare.

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

The proposal is a non-project, non-site-specific action which would not create light or glare.

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

The proposal is a non-project, non-site-specific action which would not create light or glare.

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

The proposal is a non-project, non-site-specific action which would not create light or glare.

12. Recreation [Find help answering recreation questions](#)

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

The proposal is a non-project, non-site-specific action which would not impact recreation.

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

The proposal is a non-project, non-site-specific action which would not impact recreation.

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

The proposal is a non-project, non-site-specific action which would not impact recreation.

13. Historic and Cultural Preservation [Find help answering historic and cultural preservation questions](#)

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

There are numerous buildings through the City of Edmonds that are over 45 years. The City has a local historic register with 20 sites on the register.

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

According to Department of Archeology and Historic Preservation's WISAARD tool, there are no known archeological sites within the CARA areas.

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

The proposal is a non-project, non-site-specific action which would not impact historic sites.

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

The proposal is a non-project, non-site-specific action which would not impact historic sites.

14. Transportation [Find help with answering transportation questions](#)

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

The proposal is a non-project, non-site-specific action which would not impact transportation.

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

The proposal is a non-project, non-site-specific action which would not impact transportation.

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

The proposal is a non-project, non-site-specific action which would not impact transportation.

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

The proposal is a non-project, non-site-specific action which would not impact transportation.

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

The proposal is a non-project, non-site-specific action which would not impact transportation.

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

The proposal is a non-project, non-site-specific action which would not impact transportation.

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

The proposal is a non-project, non-site-specific action which would not impact transportation.

15. Public Services [Find help answering public service questions](#)

- a. Would the project result in an increased need for public services (for example: fire protection,**

police protection, public transit, health care, schools, other)? If so, generally describe.

The proposal is a non-project, non-site-specific action which would not increase the need for public services.

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

The proposal is a non-project, non-site-specific action which would not increase the need for public services.

16. Utilities [Find help answering utilities questions](#)

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

The proposal is a non-project, non-site-specific action which would not impact utilities.

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

The proposal is a non-project, non-site-specific action which would not trigger the need for additional utilities.

C. Signature [Find help about who should sign](#)

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



Type name of signee: Mike Clugston

Position and agency/organization: Acting Planning Manager, City of Edmonds

Date submitted: 11/9/2023

D. Supplemental sheet for nonproject actions [Find help for the nonproject actions worksheet](#)

IT IS NOT REQUIRED to use this section for project actions.

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

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

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

The proposal would not directly increase discharges to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise. The updated critical aquifer recharge area regulations would provide additional protections to Olypmic View's two drinking water supplies in Edmonds by reducing the potential for groundwater contamination.

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

Since increased impacts are not anticipated, there are no specific measures are proposed.

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

The critical aquifer recharge area regulations would provide additional protections to Olypmic View's two drinking water supplies in Edmonds by reducing the potential for groundwater contamination. The additional protections would likely have a positive affect on fish and marine life over time as water quality is maintained and potential pollution avoided.

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

Since increased impacts are not anticipated, there are no specific measures are proposed.

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

The proposed critical area regulations would not result in the depletion of energy or natural resources.

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

Since no depletion of energy or natural resources is anticipated, no specific measures are proposed.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks,

wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

The updated regulations would provide additional protections for the two critical aquifer recharge areas in Edmonds – the Deer Creek Springs and 228th Street wellhead protection areas and buffers operated by the Olympic View Water and Sewer District. This is consistent with the Growth Management Act.

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

Since no negative impacts are anticipated to the CARAs are the result of the proposed regulations, no specific measures are proposed.

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

The updated CARA regulations would not apply within the shoreline jurisdiction in Edmonds. They would apply as an overlay to existing zoned areas and would restrict more intense land uses within the CARAs that have a greater potential for contamination and groundwater degradation. All other uses permitted by the underlying zones would still be allowed.

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

Since no negative impacts are anticipated to the CARAs as a result of the proposed regulations, no specific measures are proposed.

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

The proposed critical area regulations would not increase demands on transportation or public services and utilities. More robust critical aquifer recharge area requirements would provide additional protections to Olympic View's drinking water supplies but not increase demand for those supplies.

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

Since increased demands are not anticipated, no specific measures are proposed.

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

The critical area regulations are intended to protect critical areas in accordance with the Growth Management Act and through the application of the best available science, as determined according to WAC 365-195-900 through 365-195-925 and RCW 36.70A.172, and in consultation with state and federal agencies and other qualified professionals.