



**Received by Email**

12/12/22



December 12, 2022

City of Mukilteo  
Attn: Linda Ritter, Senior Planner  
11930 Cyrus Way  
Mukilteo, Washington 98275

**RE: Zoning and Shoreline Master Program Consistency Evaluation  
Port of Everett Interim Commercial Parking Lot – 707 Front Street**

Introduction

The Port of Everett (Port) is proposing an interim commercial parking lot at 707 Front Street [Snohomish County Parcel No. 00451300100100] (Property) that was most recently holding lanes for the former Washington State Ferry Terminal. Prior to that, a portion of the property was used for a Buzz Inn restaurant and two residential units, both with associated parking. The Property is zoned Downtown Business DB, and a portion of the Property is within 200 feet (ft) of Possession Sound, which is within the jurisdiction of the City of Mukilteo's (City) Shoreline Master Program (SMP). Along with the change of use, the Port is proposing minor maintenance activities to the site to restore and repair the asphalt to a state comparable to its original condition.

The SMP environmental designation for the Property is Urban Waterfront. The purpose of this designation is to provide for development and redevelopment of water-oriented (water enjoyment or water-related) commercial and recreational activities, while protecting existing ecological functions and improving ecological functions in areas that have been previously degraded. The Urban Waterfront Shoreline Environment consists of the lands upland of the OHWM that are currently occupied by, or planned for occupancy by water-dependent/water related/water enjoyment uses, including water-dependent/water-related transportation, mixed-use commercial and parks, and recreational uses.

This technical memorandum demonstrates the project's consistency with the goals, policies, and regulations presented in Mukilteo Municipal Code (MMC) Title 17 – Zoning, the City's SMP (City of Mukilteo 2020), and MMC Title 17B – Shoreline Management Regulations. Information presented in the project plans, floodplain development permit application, Determination of Non-Significance and State Environmental Policy Act (SEPA) checklist prepared for the project provide supplemental information to this technical memorandum.

## PROJECT DESCRIPTION

---

Site work includes basic maintenance activities such as sealcoating and restriping. The proposal includes a change of use for the site to allow for an interim commercial parking lot. The lot will provide 99 parking spaces including four (4) ADA accessible spaces and include planter boxes to convert the site from former ferry holding lanes to an interim commercial parking lot. According to the Downtown Waterfront Master Plan (2016), limited parking in the downtown area is a recurring issue for the businesses, patrons, and the residents of Mukilteo (pg. 14). In addition, a 2016 parking analysis for the Downtown by the City of Mukilteo concluded at that time an unsupplied demand of 518 parking spaces at peak demand, including 25 spaces for Lighthouse Park, 354 spaces for businesses, and 99 spaces for transit. The intent of the proposal is to alleviate a some of this demand by providing hourly, short-term, and monthly-parking options.

### *Existing and Previous Use(s):*

- Essential Public Facility (Washington State Ferries Holding Lanes)
- Restaurant (Buzz Inn)
- Single-family units (2)

### *Existing Characteristics*

The existing conditions of the site are as follows:

- Paved surface with asphalt and striping, and temporarily fenced
- Stormwater collection and retention system with minor vegetation
- The paved portion of the site is absent of vegetation and other natural features that would provide shoreline or ecological functions
- Not located within a critical area or its buffer

### Proposed Use and Activities

#### *Proposed Use*

The proposed uses of the site are as follows:

- Interim commercial parking lot to include 99 spaces
- Parking spaces delegated as follows:
  - Thirteen (13) stalls for employees/visitors of adjacent restaurant (Ivar's). Spaces will be located within the Shoreline area and are required as part of a water-enjoyment permitted use (Restaurant and outdoor seating) across the street.
  - Sixty-three (63) stalls for hourly parking (up to 72-hrs). Spaces will be located within the Shoreline area and support and are auxiliary to existing water-dependent, water-related, and water-enjoyment uses within the Shoreline area.
  - Twenty-three (23) stalls for monthly commuter parking. Spaces will be located outside of the Shoreline area.

#### *Proposed Maintenance*

The Port proposes to maintain the existing asphalt surface by applying seal coating, which is a common maintenance activity used to prevent decline of the parking surface. The proposed restriping will repair the striping on the surface to a state comparable to its original condition.

Restriping is necessary after seal coating, as the latter covers the existing striping.

Proposed maintenance does:

- Restore the lot to a state comparable to its original condition, including but not limited to its size, shape, configuration, location and external appearance

Proposed maintenance does not:

- Expand the area of asphalt on the lot,
- Increase the amount of impervious surface on the property,
- Change drainage patterns,
- Alter vegetation or natural areas on or off-site,
- Result in the disturbance of a critical area or buffer, or
- Cause substantial adverse effects to shoreline resource or environment

**TITLE 17 – ZONING**

---

The following development and design standards were copied from MMC Title 17 based on the applicable features of the project.

Zoning Regulations

The following sections of Shoreline Management Program regulations apply to the proposal:

- 17.16.040 Permitted use matrix.
- 17.56.140 Commercial parking lots and structures.

*17.16.040 Permitted use matrix.*

Within the DB zoning classification, an interim commercial parking lot is permitted.

*17.56.140 Commercial parking lots and structures.*

The following development regulations apply to interim commercial parking facilities. The table below summarizes how the proposal satisfies each development regulation.

<p><b>A. Interim Commercial Parking Lots. Existing parking lots originally created as an accessory use to meet off-street parking requirements for a primary use on the parcel may be partially or completely converted into a commercial parking lot pursuant to the following requirements. No conditional use permit is required for an interim commercial parking lot.</b></p>	
<p><b>1. The existing parking lot was legally established with the primary use.</b></p>	<p>See Ordinance 1465 regarding expanded eligibility requirements for interim commercial parking lots. The property is an existing paved, vacant lot in the Downtown Business zone, previously used for holding vehicles.</p>
<p><b>2. The existing parking lot is paved.</b></p>	<p>The property is an existing paved, vacant lot in the Downtown Business zone.</p>

<p><b>3. The interim use as a commercial parking lot ends no later than December 31, 2023.</b></p>	<p>See Ordinance 1465 regarding expanded timeline requirements for interim commercial parking lots.</p>
<p><b>4. There are more than two parking spaces beyond the minimum number of off-street parking spaces required by this chapter. At least the minimum number of parking spaces required for the primary uses on the parcel shall be designated for exclusive use by the primary uses and shall not be used as commercial parking spaces.</b></p>	<p>Not applicable. The property is an existing paved, vacant lot. The primary use will be an interim commercial parking lot.</p>
<p><b>5. Safe pedestrian routes are available on a right-of-way adjacent to the parcel on which the parking lot is located as determined by the director of planning and community development or director of public works, or their designee.</b></p>	<p>The proposed parking lot layout provides safe pedestrian routes on rights-of-way adjacent to the parcel.</p>
<p><b>6. A solid fence at least four feet high shall be located between the parking lot and residential uses on parcels adjacent to the parking lot.</b></p>	<p>Not applicable. No residential uses are adjacent to the parking lot.</p>
<p><b>7. Up to fifty percent of the parking stalls in the entire parking lot may be compact stalls provided compact parking stalls are only located on aisles where all of the stalls on one side are exclusively compact stalls.</b></p>	<p>Not applicable. The proposal does not include compact stalls.</p>
<p><b>8. The requirements of Section 17.58.070, Screening between districts, shall be conformed to where the parking lot is on a parcel adjacent to a single-family use.</b></p>	<p>Not applicable. No residential uses are adjacent to the parking lot.</p>
<p><b>9. In zoning districts where permanent commercial parking lots are allowed, an interim commercial parking lot may be converted to a permanent use by obtaining a conditional use permit before December 31, 2023, pursuant to Chapter 17.64 and this chapter.</b></p>	<p>Not applicable. The proposal does not seek to be converted to a permanent use at this time.</p>
<p><b>10. Operators of commercial parking lots shall be subject to the requirements of Chapter 5.04, Business Licenses and Regulations.</b></p>	<p>The proposal will comply with requirements of Chapter 5.04, Business Licenses and Regulations.</p>
<p><b>11. The commercial parking lot shall be subject to Chapter 5.10, Commercial Parking Tax.</b></p>	<p>The proposal will comply with requirements of Chapter 5.10, Commercial Parking Tax.</p>

**ORDINANCE 1465 - JUNE 27, 2022**

---

On June 27, 2022, Mukilteo City Council approved Ordinance 1465, which expanded the eligibility for parcels that may be used for interim commercial parking. The ordinance included the following:

- Expanded the eligibility for lots to be converted to interim commercial parking in the Downtown Business District Zone only, to include, *“Existing, paved, vacant lots in the Downtown Business District zone in existence as of July 11, 2022, may also be partially or completely converted into an interim commercial parking lot...”*
- Extended sunset date for all interim commercial parking lots from December 31, 2023, to December 31, 2028.

**TITLE 17B – SHORELINE MANAGEMENT REGULATIONS**

---

Approximately half of the property is located within 200 feet (ft) of the Possession Sound Ordinary High-Water mark, which is within the jurisdiction of the City of Mukilteo’s (City) Shoreline Master Program (SMP). The SMP environmental designation for the Property is Urban Waterfront. The purpose of this designation is to provide for development and redevelopment of water-oriented (water enjoyment or water-related) commercial and recreational activities, while protecting existing ecological functions and improving ecological functions in areas that have been previously degraded.

**Shoreline Management Program Goals**

The SMP provides general shoreline policies that address various general topics of importance when considering development of the shorelines and are intended to specifically support the goal statements also provided in the SMP. The goals and policies address shoreline “elements,” including:

- Economic Development
- Public Access
- Recreation
- Circulation
- Land Use
- Conservation
- Historic and Cultural
- Scientific and Educational
- Flood Damage

The following General Shoreline Goals were copied from the City’s SMP based on the applicable shoreline “elements” and are provided project specific evaluation:

Shoreline Management Program Goals	
<b>GD 1: Encourage City entryways, commercial development, and redevelopment near the urban waterfront to reflect the City's waterfront in a manner that will enhance the public enjoyment and access to the waterfront.</b>	The proposal will help meet existing demand for parking that will allow public access and enjoyment to the waterfront. The proposal does not preclude future development of the site consistent with the Downtown Waterfront Master Plan (2016) or other subsequent City plans.
<b>GD 2: Ensure compatibility of adjacent land uses through the use of buffer, landscaping, and quality building design to mitigate impacts and enhance the City's unique identity and distinctive entryways.</b>	The proposal includes perimeter landscaping (planters) compatible with adjacent land uses.
<b>GD 3: Promote economic development and redevelopment to provide for a tax base that is balanced so the tax burden is shared among residential, commercial, and industrial properties.</b>	No change is proposed to the land use or zone of the commercial property. In addition, the commercial parking tax will generate local revenue for the City of Mukilteo.
<b>GD 4: Provide cost-effective and efficient public infrastructure and services that are sensitive to the environment; and that balance the use of a variety of modes of transportation.</b>	The proposal is a cost-effective use of an existing, vacant, paved lot that will provide additional parking that is currently in high demand from the various water-dependent, water-related, and water-enjoyment uses within the Shoreline area.
<b>GD 5: Protect and enhance the City's critical areas and shoreline management zones to support fish and wildlife resources, maintain water quality and protect visual and aesthetic qualities.</b>	Proposed maintenance does not expand the area of asphalt on the lot, increase the amount of impervious surface on the property, change drainage patterns, alter vegetation or natural areas on or off-site, result in the disturbance of a critical area or buffer, or cause substantial adverse effects to shoreline resources or environment. Existing stormwater system will be maintained to protect water quality and planters will be added to enhance visual aesthetics.
<b>GD 6: Provide a system of parks, recreational, and cultural facilities that incorporates both public entities (City, County, State, Port of Everett, and schools), and private assets in order to expand opportunities within the City, views of the water and mountain scenery and public access along the shoreline.</b>	The proposal will accommodate existing demand for parking that will allow public access and enjoyment to the waterfront. The proposal will support the existing systems of parks, recreational, and cultural facilities.
<b>GD7: Be responsive to the beneficial and adverse impacts new technology may have on shoreline issues.</b>	The parking management system will be wireless and unmanned, thus negating the need for utility connections above or below the ground effectively reducing potential impacts to the shoreline.

**Shoreline Management Program Policies**

The policies of the SMP applicable to the project include General Shoreline Policies, Public Access and Recreation Policies, Use and Circulation Policies, and Urban Waterfront Shoreline Environments – Priority of Land and Water Uses. While a portion of the site is located in a floodplain, the policies include criteria that do not apply to the proposed site improvements. The following policies were copied from the City’s SMP based on the applicable shoreline “elements” and are provided project specific evaluation (policies not applicable to the project are omitted):

Shoreline Management Program – General Policies	
<p><b>SH 1: Work with the Port of Everett, the City of Everett, Snohomish County, BNSF, and other entities, and private landowners to;</b></p> <ul style="list-style-type: none"> <li><b>a) develop direct linkages to the waterfront; and,</b></li> <li><b>b) provide recreational opportunities and restore ecological functions through use of innovative approaches.</b></li> </ul>	<p>The proposal is an innovate approach to help alleviate existing parking demand by reconfiguring an existing, paved lot into an interim commercial parking lot. The additional parking will benefit shoreline recreation users.</p>
Shoreline Management Program – Public Access and Recreation Policies	
<p><b>SH13: Encourage cooperation and joint use between public and private agencies and landowners to increase and diversify shoreline recreation opportunities.</b></p>	<p>The proposal encourages cooperation and joint use by providing parking for a variety of uses along the waterfront, including park users, restaurant patrons and employees, ferry riders, commuters, etc.</p>
Shoreline Management Program – Use and Circulation Policies	
<p><b>SH14: Generally limit new development within shoreline jurisdiction to water-dependent, water-related or water-enjoyment uses, public access, ecological restoration activities, or to essential regional public facilities that cannot feasibly be located elsewhere. Shops and services supporting the needs of commuters and visitors are also appropriate.</b></p>	<p>The proposal compliments and supports existing waterfront uses by providing in-demand parking for existing water-dependent, water-related, and water-enjoyment uses, including restaurants, park facilities, ferry users, SCUBA divers, etc.</p>
<p><b>SH15: With the exception of pedestrian, bicycle, and emergency vehicle access, locate ferry vehicle staging, shared parking spaces, vehicle circulation and parking systems which are not related to shoreline-dependent uses or serving the multimodal station as far from the shoreline as possible.</b></p>	<p>The property is land locked and located upland from the physical shoreline. Parking located within the 200’ shoreline area will support existing, City-approved, water-dependent, water-related, and water-enjoyment uses. Parking located outside of the 200’ shoreline area is dedicated for monthly, commuter parking.</p>
Shoreline Management Program – Urban Waterfront/Urban Waterfront Park Shoreline Environments – Priority of Land and Water Uses	

<p><b>UW1: Priority shall be given to water-dependent uses, including ferry terminals and boat launches, in the Urban Waterfront Environment. Water-related and water-enjoyment uses shall be given second priority.</b></p>	<p>The proposal supports and provides in demand parking for existing water-dependent, water-related, and water-enjoyment uses, including the ferry users, restaurants, park facilities, SCUBA divers, etc.</p>
<p><b>UW2: Non-water-oriented uses shall not be allowed except as:</b></p> <ul style="list-style-type: none"> <li>▪ part of mixed-use developments;</li> <li>▪ in existing developed areas supporting water-dependent uses; or</li> <li>▪ in limited situations where there is no direct access to the shoreline.</li> </ul>	<p>The proposal unto itself is a non-water-oriented use located in an existing developed area. However, it directly supports water-dependent uses (ferry users, park facilities, restaurants, etc.). In addition, the site is inland from and has no direct access to the shoreline.</p>
<p><b>UW3: Non-water-dependent uses that are auxiliary to, and necessary for, multimodal/intermodal public transportation shall be allowed, provided no other feasible alternative exists.</b></p>	<p>The proposal unto itself includes maintenance of a non-water dependent area, however, the change of use supports existing water-dependent uses including multimodal/intermodal public transportation users as well as other water-dependent, oriented and enjoyment uses. In addition, the site is inland from and has no direct access to the shoreline.</p>

Shoreline Management Program Development Regulations

The following sections of Shoreline Management Program development regulations apply to the proposal:

- 17B.16.040 Shorelines Permitted Use Matrix.
- 17B.16.070 Development regulations for parking.
- 17B.25.090 Off-street parking—Parking facilities—Lots—Structures.
- 17B.56 Off-Street Parking
- 17B.58.040 Landscaping requirements for parking lots.

*17B.16.040 Shorelines Permitted Use Matrix.*

Project activities that occur in SMP jurisdiction include change in use and associated improvements identified above. “Commercial Parking Lot or Garage” (Commercial) is listed as a permitted uses in the Urban Waterfront environmental designation.

*17B.16.070 Development regulations for parking.*

The following development regulations apply to parking facilities within the Shoreline area. The table below summarizes how the proposal satisfies each development regulation.

<p><b>A. On-site parking for single-purpose or joint use/shared parking lots and garages in commercial, mixed-use, and multi-modal development within the two-hundred-foot shoreline jurisdiction in the urban</b></p>	<p>Not applicable. The property is not location within seventy-five feet of the OHWM.</p>
--	---



<p><b>waterfront environment designation and WMU zones shall not be located within seventy-five feet of the OHWM. Off-street parking is limited to the parking necessary to support a permitted use unless created as shared or joint parking.</b></p>	
<p><b>B. Off-site parking for permitted uses within the shoreline jurisdiction shall be located outside the shoreline jurisdiction in joint-use or shared parking garages or lots where garages are not feasible. If it is necessary for the project success to have accessory parking within seventy-five feet of the shoreline, all accessory parking will be located on a public street or as part of a shared parking garage.</b></p>	<p>Parking located with the 200’ shoreline area is dedicated for water-dependent, water-related, and water-enjoyment uses. Parking located outside of the 200’ shoreline area is dedicated for monthly, commuter parking.</p> <p>Not applicable. The property is not location within seventy-five feet of the OHWM.</p>
<p><b>C. Parking garages or parking lots shall be located landward of the permitted shoreline use, such that a building or park use separates the shoreline from the parking lot or stalls. Parking under or landward of buildings is preferred over stand-alone parking lots. Parking to the side must be camouflaged by solid walls with landscaping.</b></p>	<p>Not applicable. The proposed primary use of the site is an interim commercial parking lot. No buildings or structures are existing or proposed on the site. The lot is separated from the shoreline by existing waterfront uses such as restaurant and public parklet.</p>
<p><b>D. Parking lots shall be concealed by using the following at a minimum:</b></p> <ol style="list-style-type: none"> <li><b>1. Five-foot-wide landscaping strip with trees and hedges within and along the perimeter of the use.</b></li> <li><b>2. Parking garages shall provide commercial, recreational, or other uses along the street frontage of Front Street and the pedestrian promenade unless otherwise allowed by the Mukilteo city council through the tank farm redevelopment process with Sound Transit, Washington State Ferries, and the Port of Everett.</b></li> <li><b>3. Parking lots shall be designed with water quality treatment as required by the most recently adopted stormwater manual.</b></li> </ol>	<p>The proposed interim lot is subject to the sunset timing in City Ordinance 1465. Therefore, the Port offers the following to satisfy this section.</p> <ol style="list-style-type: none"> <li>1. The proposal includes perimeter landscaping (planters) consistent with Guideline 21 and 22. Planters will provide adequate pedestrian screening and satisfy perimeter landscaping requirements. Landscaping requirement in the WMU are not applicable as the property is located upland from the Shoreline in the DB zone.</li> <li>2. Not applicable. The proposal does not include a parking garage.</li> <li>3. Existing stormwater facilities will be maintained throughout the life of the use. The proposed maintenance activities are considered “Pavement Maintenance” under the 2019 Stormwater Manual for Western Washington (pg. 86, 87).</li> </ol>
<p><b>E. Parking over water is prohibited, except as necessary for ferry terminal operations.</b></p>	<p>Not applicable. Over water parking is not proposed.</p>

<p><b>F. Shared parking for uses with different hours of operation is strongly encouraged.</b></p>	<p>The parking spaces dedicated to hourly parking intend to be shared between demand for existing water-dependent, water-related, and water-enjoyment uses within the Shoreline area.</p>
<p><b>G. Parking facilities for shoreline uses shall provide ADA compliant pedestrian circulation within the parking area and to the shorelines.</b></p>	<p>The parking layout plan is designed to provide adequate, ADA compliant pedestrian circulation from the parking area to other shoreline uses.</p>
<p><b>H. Public view parking shall be integrated into parking lots serving the promenade, parks, and open spaces along the shoreline.</b></p>	<p>Not applicable. The property is located upland front the shoreline and does provide public view parking opportunities.</p>
<p><b>I. Parking facilities shall be planned, located, and designed so that each facility will have the least possible adverse effect on unique or fragile shoreline features and existing ecological functions.</b></p>	<p>The property is located inland of existing development along the shoreline (Ivar's, Silver Cloud Inn, etc.). The proposal does not increase existing impervious surface quantities and is designed to have the least possible adverse effect on the shoreline and ecological functions.</p>
<p><b>J. Lighting shall be shielded from surrounding uses and the water.</b></p>	<p>Not applicable. The proposal does not include any additional lighting.</p>
<p><b>K. Stormwater runoff shall be directed away from the shoreline and to an approved and designated stormwater collection facility that has best available technology (BAT) treatment before releasing directly into Puget Sound.</b></p>	<p>Existing drainage patterns and facilities will not be changed or altered. The proposed maintenance activities are considered "Pavement Maintenance" under the 2019 Stormwater Manual for Western Washington (pg. 86, 87).</p>
<p><b>L. Parking requirements of Section 17B.25.090 and Chapter 17B.56 shall also apply to all development proposals. If there is a conflict between these sections, the most restrictive shall apply.</b></p>	<p>The proposal will comply with requirements of Section 17B.25.090 and Chapter 17B.56.</p>

*17B.25.090 Off-street parking—Parking facilities—Lots—Structures.*

<p><b>A. Off-street parking in commercial areas shall either be behind or to the side of development with ground-floor retail along the street frontage.</b></p>	<p>Not applicable. The property is an existing paved, vacant lot. The primary use will be an interim commercial parking lot. No vertical construction is proposed at this time.</p>
<p><b>B. Structured parking is encouraged to maximize development potential in this relatively small, narrow waterfront mixed-use district.</b></p>	<p>The proposed use of a commercial parking lot is interim. Maximization of development potential will be evaluated at a later date and may or may not include structured parking.</p>
<p><b>C. Shared or joint parking is encouraged south of Front Street so that parking needs</b></p>	<p>The proposal encourages shared or joint parking by providing parking for a variety of uses along</p>

<p><b>generated by development north of Front Street can be accommodated outside the two-hundred-foot shoreline zone.</b></p>	<p>the waterfront, including park users, restaurant patrons and employees, ferry riders, commuters, etc.</p>
<p><b>D. A minimum of curb cuts should be allowed along Front Street for parking access.</b></p>	<p>The proposal does not add any additional access points or curb cuts along Front Street within the Shoreline.</p>
<p><b>E. Adjacent street frontage to commercial properties can be counted on a one-to-one basis towards the parking requirement on streets that are improved and have designated parking.</b></p>	<p>Not applicable. The proposal does not include on-street parking.</p>
<p><b>F. Residential units in the downtown business and waterfront mixed-use districts shall provide one and one-half parking space per unit. Parking for the commercial/retail/office space shall be determined using the parking matrix contained in Chapter 17B.56, Off-Street Parking.</b></p>	<p>Not applicable. The proposal does not include residential uses.</p>
<p><b>G. Employee parking shall be provided on site, or as part of a shared parking agreement or at a parking structure.</b></p>	<p>The proposal itself will not generate any on-site jobs. However, thirteen (13) parking spaces are dedicated for Ivar's, which is located across the street from the property.</p>
<p><b>H. Joint or shared access, and off-street parking, internal circulation or parking is encouraged with adjacent uses.</b></p>	<p>The proposal provides the opportunity for shared or joint parking by supporting existing demand for parking associated with a variety of uses along the waterfront, including park and promenade users, restaurant patrons and employees, ferry riders, commuters, etc.</p>
<p><b>I. A development can reduce the required off-street parking spaces up to fifty percent when it can be demonstrated, in a parking-traffic study, prepared by a traffic engineer, that use of transit or demand management programs, special characteristics or customer, client, employee or resident population will reduce expected vehicle use and parking space demand for their development, as compared to standard Institute of Transportation Engineers vehicle trip generation rates and city parking requirements.</b></p>	<p>Not applicable. The proposal is not proposing a reduction in off-street parking,</p>
<p><b>J. Parking lots shall have internal landscaping as well as be screened from streets and pedestrian ways. (See Section 17B.25.120,</b></p>	<p>The proposal includes perimeter landscaping (planters) consistent with Guideline 21 and 22. Planters will provide adequate pedestrian</p>

<b>Guidelines 21: Parking Lots—Landscape Design and 22: Screening Parking Lots—Pedestrian Environment.)</b>	screening and satisfy perimeter landscaping requirements. Landscaping requirement in the WMU are not applicable as the property is located upland from the Shoreline in the DB zone. As an interim use, permanent landscaping beds are not feasible.
<b>K. Parking garages shall be screened to improve the pedestrian environment in mixed-use zones. (See Section 17B.25.120, Guideline 23: Screening Parking Garages—Pedestrian Environment.)</b>	Not applicable. The proposal does not include a parking garage.
<b>L. Parking Facilities—Lots—Structures for Transit. Shall adhere to the requirements outlined in Section 17B.56.040.</b>	Not applicable. The area designated for monthly parking permits (commuter) is located outside of the Shoreline area.

*17B.56.030 Location and design of parking lots.*

<b>A. Off-street parking in commercial areas shall either be behind or to the side of development with ground-floor retail along the street frontage.</b>	Not applicable. The property is an existing paved, vacant lot. The primary use will be an interim commercial parking lot. No vertical construction is proposed.
<b>B. In the relatively small, narrow waterfront mixed-use district, structured parking is encouraged to maximize development potential.</b>	Not applicable. This is an interim use and the proposal does not include structured parking.
<b>C. Shared or joint parking is encouraged south of Front Street so that parking needs generated by development north of Front Street can be accommodated outside the shoreline zone of two hundred feet from the ordinary high tide.</b>	The proposal encourages shared or joint parking by providing parking for a variety of uses along the waterfront, including park users, restaurant patrons and employees, ferry riders, commuters, etc.
<b>D. A minimum of curb cuts should be allowed along Front Street for parking access.</b>	The proposal does not add any additional access points or curb cuts along Front Street within the Shoreline.
<b>E. Adjacent street frontage to commercial properties can be counted on a one-to-one basis towards the parking requirement on streets that are improved and have designated parking.</b>	Not applicable. The proposal does not include on-street parking.
<b>F. Employee parking shall be provided on site, or as part of a shared parking agreement or at a parking structure.</b>	The proposal itself will not generate any on-site jobs. However, thirteen (13) parking spaces are dedicated for Ivar's, which is located across the street from the property.

<p><b>G. Joint or shared access, and off-street parking, internal circulation or parking is encouraged with adjacent uses.</b></p>	<p>The proposal encourages shared or joint parking by providing parking for a variety of uses along the waterfront, including park users, restaurant patrons and employees, ferry riders, commuters, etc.</p>
<p><b>H. Parking lots shall have internal landscaping as well as be screened from streets and pedestrian ways. (See Section 17B.25.120, Guidelines 21: Parking Lots—Landscape Design and 22, Screening Parking Lots—Pedestrian Environment.)</b></p>	<p>The proposal includes perimeter landscaping (planters) consistent with Guideline 21 and 22. Planters will provide adequate pedestrian screening and satisfy perimeter landscaping requirements. Landscaping requirement in the WMU are not applicable as the property is located upland from the Shoreline in the DB zone. As an interim use, permanent landscaping beds are not feasible.</p>
<p><b>I. Parking garages shall be screened to improve the pedestrian environment in mixed-use developments. (See Section 17B.25.120, Guideline 23: Screening Parking Garages—Pedestrian Environment.)</b></p>	<p>Not applicable. The proposal does not include a parking garage.</p>

*17B.58.040 Landscaping requirements for parking lots.*

<p><b>C. Parking Lots. Parking lot landscaping shall consist of all of the following:</b></p> <p><b>6. If grass pave, rain store, or an equivalent alternative is proposed for the parking lot design, an alternative landscape plan may be approved the city; provided, that the intent of this chapter has been met.</b></p>	<p>The proposal includes a landscape plan that provides 34 aboveground planters along the north and west property lines to avoid disturbance of potential buried cultural resources. The planters provide approximately 300 sf of landscaping. No landscaping is provided along the south property line as the property is bordered by a 4’ tall retaining wall. Perimeter landscaping (5’) and fencing existing along the east property line and provides approximately 500 sf of additional landscaping. A stormwater detention area makes up approximately 3,000 sf of the eastern panhandle portion of the property. Plant selection is limited to shrubs, ornamental grasses, groundcovers, and seasonal annuals/perennials due to limited growing space. Plant species adapted to local climatic conditions and tolerant of salt spray will be chosen. Plants will meet the American Standard of Nursery Stock (ANSI Z60.1-2014). Permanent irrigation is not proposed. The plant containers will be provided soils amended to support plant growth and efficient moisture retention. As an interim use, permanent landscaping beds are not feasible.</p>
--	---

## **CONCLUSION**

---

The Port is proposing an interim commercial parking lot at 707 Front Street, which occurs within the Downtown Business zoning classification and is partially within City shoreline jurisdiction. The proposed project elements subject to this application do not conflict with the goals, policies, or regulations of the MMC and SMP. Information presented in the application packet, including site plans, surveys, traffic analysis, Determination of Non-Significance and SEPA checklist, prepared for the project provide supplemental information to this application.

If you have any questions or need additional information, please contact me at (425) 330-6564 or via email at [laurag@portofeverett.com](mailto:laurag@portofeverett.com).

Sincerely,



Laura M. Gurley, Director of Planning  
**PORT OF EVERETT**

CC: