
From: Brooks Bennett <brooksbenett79@gmail.com>
Sent: Monday, August 12, 2024 11:37 PM
To: Contact Council
Subject: Please Vote YES on the Urban Tree Canopy Policy

I urge the Council to approve the Urban Tree Canopy policy as part of the 2024 Comprehensive Plan Update. With climate change impacts increasing and the need to protect our water quality, it is imperative that Snohomish County add these new policies to reduce and mitigate these impacts including protecting the tree canopy. Trees provide so many benefits to our homes, neighborhoods and communities. We must end the practice of clearcutting every inch of green land for development; we need to ensure that trees--existing and newly-planted--will provide a tree canopy that will benefit everyone now and in the future.

Having trees in our urban growth area communities is very important to me. We must stop the practice of clearcutting all our land for large residential subdivisions and commercial buildings.

We can build housing in our cities and existing urban growth areas to meet the demands of another 300,000 new people moving here in the next 20 years AND have trees in our urbanized communities.

I support the PDS and Planning Commission policy recommendations for the Urban Tree Canopy Policy, especially the goal of no net loss of 38 percent for tree canopy in our urban growth areas.

In order to build our green, equitable future, please ensure the policies will require the county to seek adequate funding for the program.

To ensure the policies are implemented and enforced, please change the word "should" to "shall" in Policies 9.A.3 and 9.A.4

In Policies 9.A.6 and 9.B.1, change periodic assessments by the County to annual assessments of urban tree canopy using the best available technology, in order to prevent the damages that could occur because of permitting mistakes and problems that occur after developments are built.

Brooks Bennett
206-914-4632 m
brooksbenett79@gmail.com

=====

Hickey, Lisa

From: Karen Bertling <kbert25@yahoo.com>
Sent: Monday, August 12, 2024 4:33 PM
To: Contact Council
Subject: Approve the Urban Tree Canopy Policy

Snohomish County Council,

I support the Proposed Draft Policy and Planning Commission policy recommendations for the Urban Tree Canopy Policy, especially the goal of no net loss of 38 percent for tree canopy in our urban growth areas.

As we are all too familiar by now, the loss of trees impacts our environment in ways we never foresaw before climate change became a daily observance. Trees provide essential mitigating factors to the planet's increasing temperatures, and they make our cities and neighborhoods more livable.

I feel it is important to include abundant tree canopy as plans for urban growth development get implemented. Housing needs for an increasing population must not come at the expense of adequate tree canopy in urbanized communities.

To ensure the policies are implemented and enforced, please change the word "should" to "shall" in Policies 9.A.3 and 9.A.4. And, in Policies 9.A.6 and 9.B.1, change periodic assessments by the County to annual assessments of urban tree canopy...

Thank you,

Karen Bertling (Edmonds resident)

Hickey, Lisa

From: Ruth Bramall <rebramall@gmail.com>
Sent: Monday, August 12, 2024 2:01 PM
To: Contact Council
Subject: Vote YES on the Urban Tree Canopy Policy

Vote YES on the Urban Tree Canopy Policy

Hickey, Lisa

From: Michael P. Critchett <rbo20res@frontier.com>
Sent: Monday, August 12, 2024 2:40 PM
To: Contact Council
Subject: Proposed Urban Tree Canopy Policy

Dear County Council folks,

As an avid birder and supporter of nature in our urban areas, I urge you to adopt the Urban Tree Canopy Policy. Thank you.

--

Mike Critchett

Hickey, Lisa

From: Duncans <duncan.bece@comcast.net>
Sent: Monday, August 12, 2024 7:28 PM
To: Contact Council
Subject: Please support the Urban Tree Canopy Policy

Hello,

I live in Edmonds.

Please support the proposed policy to retain and develop an urban tree canopy. It is essential the character of our ecosystem, and will become increasingly important to our survival as the summers get hotter and drier.

There are practical considerations for daily quality of living as well, including that once the tree canopy is gone, raptors like owls who keep the rat population down have no place to live and the rat problem increases. This is the case in a nice neighborhood in my home city where the majority of trees were cleared out to provide views for expensive homes.

All best, Eileen

Hickey, Lisa

From: Lorelette Knowles <lmerylk@gmail.com>
Sent: Monday, August 12, 2024 1:29 PM
To: Contact Council
Subject: Please approve the Urban Tree Canopy policy

I urge the Council to approve the Urban Tree Canopy policy as part of the 2024 Comprehensive Plan Update. With climate change impacts increasing and the need to protect our water quality, it is imperative that Snohomish County add these new policies to reduce and mitigate these impacts including protecting the tree canopy. Trees provide so many benefits to our homes, neighborhoods and communities. We must end the practice of clearcutting every inch of green land for development; we need to ensure that trees--existing and newly-planted--will provide a tree canopy that will benefit everyone now and in the future.

Having trees in our urban growth area communities is very important to me. We must stop the practice of clearcutting all our land for large residential subdivisions and commercial buildings.

We can build housing in our cities and existing urban growth areas to meet the demands of another 300,000 new people moving here in the next 20 years AND have trees in our urbanized communities.

I support the PDS and Planning Commission policy recommendations for the Urban Tree Canopy Policy, especially the goal of no net loss of 38 percent for tree canopy in our urban growth areas.

In order to build our green, equitable future, please ensure the policies will require the county to seek adequate funding for the program.

To ensure the policies are implemented and enforced, please change the word "should" to "shall" in Policies 9.A.3 and 9.A.4

In Policies 9.A.6 and 9.B.1, change periodic assessments by the County to annual assessments of urban tree canopy using the best available technology, in order to prevent the damages that could occur because of permitting mistakes and problems that occur after developments are built.

Thank you for your attention to this, and for supporting a healthy "green" tree-enhanced future!

Very sincerely yours,
Lorelette Knowles

Everett, WA

Hickey, Lisa

From: bob krigbaum <bckrigbaum@hotmail.com>
Sent: Monday, August 12, 2024 3:44 PM
To: Contact Council
Subject: 2024 Comprehensive Urban Plan Update

As a resident and voter in Snohomish County for the past 50+ years, I urge you to approve and fund the 2024 Urban Tree Canopy Policy. I believe trees are vital to our very existence, and maintaining or increasing the Urban Tree Canopy will enhance our everyday way of life.

Sincerely, Bob Krigbaum, 14115 80th St SE, Snohomish.

Sent from my Verizon, Samsung Galaxy smartphone

Hickey, Lisa

From: Matthew Riggen <mriggen64@gmail.com>
Sent: Monday, August 12, 2024 3:53 PM
To: Contact Council
Subject: Please Support Urban Grown Area trees

To the Snohomish County Council,

As you consider updates to the Comprehensive Plan please include strong protections for urban trees and the proposed requirement for a minimum 38% tree canopy overall, that this be a requirement and that it be monitored annually for changes. We have sacrificed far too many trees in our developed areas and have failed to plant sufficient replacement trees. Though I understand it can present some challenges for proposed developments and also long-term concerns about maintenance, the benefits of trees for temperature moderation, CO2 sequestration, wildlife habitat and to the human psyche and spirit far outweigh the costs. I have a large oak and two maples on my lot in Darrington and they are a major benefit to me, my neighbors and my community. Many friends and even just passers by have said to me over the years "I really love your trees." I support the Planning Commission's policy recommendation for the Urban Tree Canopy Policy.

Sincerely,
Matt Riggen
Darrington, WA

Hickey, Lisa

From: Dorothy L Young <echolake2@frontier.com>
Sent: Monday, August 12, 2024 4:45 PM
To: Contact Council
Subject: Urban tree policy

Please, please vote yes for Urban Tree Canopy Policy. I cannot imagine anyone voting no. Thanks. Dorothy Young Sent from my iPad

Hickey, Lisa

From: Killingstad, David
Sent: Tuesday, August 13, 2024 9:02 AM
To: Lynn Eshleman
Cc: McCrary, Michael; Dobesh, Michael
Subject: RE: LAND USE Application Not Accepted ID#1522507 Mason Lane

Hi Lynn,

We are hearing September 11 as a possible date for action by the County Council to get the 2024 Update completed before the budget process starts to consume their time. With that in mind the issue of effective date is a little bit tricky.

Under RCW 36.70A.067, UGA expansions and related zoning are not effective until after the latest of the following dates: (1) 60 days after the date of publication of notice of adoption of the ordinances, as provided in RCW 36.70A.290(2); or (2) if a petition for review to the Growth Management Hearings Board is timely filed challenging a UGA expansion, upon issuance of the Board's final order affirming the UGA expansion or a decision by a court of law concluding the UGA expansion complies with the GMA.

For all other amendments to the Comprehensive Plan including areawide infill rezones, the effective date is based on language in the County Charter. Assuming the above September 11 action date happens then an effective date could be around October 7 (earlier if the Council chooses to transmit the ordinances in less than five working days to the Executive and/or the Executive signs them in less than 10 working days).

Except from County Charter:

Every ordinance shall be presented to the county executive within five working days after adoption by the county council. Within ten working days after presentation, the county executive shall either sign the ordinance and return it or veto the ordinance and return it to the county council with the executive's written objections. If an ordinance is not returned to the county council within ten working days after its presentation, it shall be deemed enacted without the county executive's signature. If the county executive vetoes an ordinance, the county council shall have thirty days to reconsider the ordinance. If the ordinance receives at least four affirmative votes it shall become law. Except as otherwise provided by this charter, all ordinances shall take effect ten days after they are signed by the county executive or otherwise enacted, or at a later date if stated in the ordinance.

Obviously if the Council takes action on a date other than September 11 we are looking at a different effect date for the ordinances. Please let me know if you have any further questions.

From: Dobesh, Michael <Michael.Dobesh@snoco.org>
Sent: Tuesday, August 13, 2024 7:31 AM
To: Killingstad, David <david.killingstad@snoco.org>
Subject: FW: LAND USE Application Not Accepted ID#1522507 Mason Lane

Any idea of effective dates for LU designations and zoning after comp plan is adopted?

Michael Dobesh | *Division Manager*
[Snohomish County Planning and Development Services](#)
3000 Rockefeller Avenue M/S 604 | Everett, WA 98201
425-388-3819 | michael.dobesh@snoco.org

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From: Lynn Eshleman <lynneshleman@outlook.com>
Sent: Tuesday, August 13, 2024 7:24 AM
To: Dobesh, Michael <Michael.Dobesh@snoco.org>
Subject: Re: LAND USE Application Not Accepted ID#1522507 Mason Lane



CAUTION. This email originated from outside of this organization. Please exercise caution with links and attachments.

Thanks Michael, kind of figured that

When will the effective date be if council votes in December?

Lynn Eshleman
425-248-9035

Hickey, Lisa

From: Lynn Carpenter <lynnbcarpenter@yahoo.com>
Sent: Tuesday, August 13, 2024 3:04 PM
To: Contact Council
Subject: Urban Tree Canopy Policy

I urge the Council to approve the policy as part of the 2024 Comprehensive Plan Update. With climate change impacts increasing and to protect our water quality, it is imperative that Snohomish County add these new policies to reduce and mitigate these impacts including protecting the tree canopy. Trees provide so many benefits to our homes, neighborhoods and communities. We must end the practice of clearcutting every inch of green land for development; we need to ensure that trees--existing and newly-planted--will provide a tree canopy that will benefit everyone now and in the future.

Having trees in our urban growth area communities is very important to me. We must stop the practice of clearcutting all our land for large residential subdivisions and commercial buildings.

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I support the PDS and Planning Commission policy recommendations for the Urban Tree Canopy Policy, especially the goal of no net loss of 38 percent for tree canopy in our urban growth areas.

In order to build our green, equitable, future, please ensure the policies will require the county to seek adequate funding for the program.

To ensure the policies are implemented and enforced, please change the word "should" to "shall" in Policies 9.A.3 and 9.A.4

In Policies 9.A.6 and 9.B.1, change periodic assessments by the County to annual assessments of urban tree canopy using the best available technology, in order to prevent the damages that could occur because of permitting mistakes and problems that occur after developments are built.

Lynn Carpenter
Edmonds

"Rather than worry about making the right decision, make the decision right" -Dr. Ellen Langer

Hickey, Lisa

From: Titcomb, Sarah
Sent: Tuesday, August 13, 2024 11:12 AM
To: Hickey, Lisa
Subject: FW: Comprehensive Plan Items Public Hearing Date
Attachments: RE: LAND USE Application Not Accepted ID#1522507 Mason Lane

Follow Up Flag: Follow up
Flag Status: Completed

Good Morning,

Below and attached are more 2024 Comp Plan Update public correspondence.

Best,
Sarah

Sarah Titcomb | *Principal Planner*

[Snohomish County Planning and Development Services](#) | Long Range Planning Division
3000 Rockefeller Avenue M/S 604 | Everett, WA 98201
425-262-2128 | Sarah.Titcomb@snoco.org
she/her/hers

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From: Slusser, Frank <frank.slusser@co.snohomish.wa.us>
Sent: Tuesday, August 13, 2024 10:08 AM
To: Andrew W. Levins <Alevins@vnf.com>
Cc: Titcomb, Sarah <Sarah.Titcomb@co.snohomish.wa.us>
Subject: RE: Comprehensive Plan Items Public Hearing Date

Hi Andrew,

The County Council has set a public hearing on the SW10 – CS Real Estate Development Final Docket XXI proposal for August 19, 2024, at 6 PM. The hearing will be held in the Jackson Board Room - 8th Floor Robert J. Drewel Building and remotely. You can find more information about the County Council process here:

<https://snohomishcountywa.gov/2134/Council-Hearings-Calendar>

The Planning Commission recommended approval of the SW10 proposal and the Executive Recommendation includes redesignation of the SW10 site to Urban Center with Urban Center zoning. Based on correspondence and comments from Councilmember Dunn it does seem there may be interest in considering not approving SW10 and keeping the site designated Urban Industrial, with the population and housing growth associated with that site shifting to other areas served by high capacity transit that have surplus capacity under the Executive Recommendation.

The public hearing is the best time to provide testimony regarding the SW10 docket proposal to be considered by the Council during deliberations.

Sincerely,

Frank Slusser | Senior Planner
[Snohomish County Planning and Development Services](#) | Long Range Planning
3000 Rockefeller Avenue M/S 604 | Everett, WA 98201
425-262-2944 | frank.slusser@snoco.org

From: Andrew W. Levins <Alevins@vnf.com>
Sent: Tuesday, August 13, 2024 9:10 AM
To: Slusser, Frank <frank.slusser@co.snohomish.wa.us>
Cc: Titcomb, Sarah <Sarah.Titcomb@co.snohomish.wa.us>
Subject: RE: Comprehensive Plan Items Public Hearing Date



CAUTION. This email originated from outside of this organization. Please exercise caution with links and attachments.

Hi Frank,

Just following up on a voicemail that I left you – my team is looking to the upcoming docket hearings, and I wanted to reach out in advance to see if there has been any change in the Staff perspective specifically regarding docket item SW-10, or if we should expect the approach recommended to the Council to remain the same. Any insights you can share would be greatly appreciated.

Thanks so much for your time,

Andrew W. Levins | Land Use Planner

alevins@vnf.com | vnf.com | D: 206.802.3845 | C: 661.342.8767

From: Slusser, Frank <frank.slusser@co.snohomish.wa.us>
Sent: Wednesday, July 17, 2024 5:49 PM
To: Andrew W. Levins <Alevins@vnf.com>
Cc: Titcomb, Sarah <Sarah.Titcomb@co.snohomish.wa.us>
Subject: RE: Comprehensive Plan Items Public Hearing Date

Caution: External Email

Hi Andrew,

The hearing date hasn't officially been set yet. The comprehensive plan ordinances, including Ordinance 24-027, were moved to General Legislative Session on July 24, 2024, at 9 AM to set date and time for the hearing.

However, Councilmembers have already publicly stated the following:

The County Council will be holding public hearings in August to receive testimony from members of the public regarding the Comprehensive Plan update. The public hearings will be held the evening of August 19 and the morning of August 21. More details for these hearings will be posted to the County Council's meeting webpage ([linked here](#)) as we get closer.

Sincerely,

Frank Slusser | Senior Planner

[Snohomish County Planning and Development Services](#) | Long Range Planning

3000 Rockefeller Avenue M/S 604 | Everett, WA 98201

425-262-2944 | frank.slusser@snoco.org

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From: Andrew W. Levins <Alevins@vnf.com>

Sent: Monday, July 15, 2024 8:50 AM

To: Slusser, Frank <frank.slusser@co.snohomish.wa.us>

Subject: Comprehensive Plan Items Public Hearing Date



CAUTION. This email originated from outside of this organization. Please exercise caution with links and attachments.

Good morning Frank,

Thank you for your continued help during this Comprehensive Plan process! I'm reaching out to see whether staff and Council has set a tentative timeline for a public hearing date for the Comprehensive Plan items, including Ordinance 24-027, and if so, whether you can provide that date or estimate an anticipated date.

Please let me know if you have any questions or need anything from us.

Sincerely,

Andrew W. Levins | Land Use Planner



1191 Second Avenue, Suite 1800
Seattle, WA 98101-2996

alevins@vnf.com | vnf.com | D: 206.802.3845 | C: 661.342.8767

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Hickey, Lisa

From: Gina Parry <ginacats@gmail.com>
Sent: Tuesday, August 13, 2024 7:26 AM
To: Contact Council
Subject: trees

More urban trees! Not just for beauty - for shade and carbon storage.
Gina

Hickey, Lisa

From: David Richman <tithonia65@gmail.com>
Sent: Tuesday, August 13, 2024 9:08 AM
To: Contact Council
Subject: Urban Tree Canopy Policy

Dear Council:

It has come to my attention that the Snohomish County Council will be deciding on policies and land uses for the next 20 years with the adoption of the 2024 Comprehensive Plan Update. It is imperative that the Council adopt the Urban Tree Canopy Policy ensuring a no net loss of the policy standards. With Global Climate Change becoming more and more obvious, the mental health benefits of trees and green space being documented, and the general need to maintain the environmental services of tree canopy in urban settings, we simply cannot afford to lose the many benefits of trees.

I was a professional biologist for over 50 years and I have seen way too much damage done from unregulated development. For a livable planet I believe that we must do whatever we can locally to counteract the trends.

Thank you for your consideration.

Sincerely,

David B. Richman
534 2nd Ave. North
Edmonds, WA 98020

Hickey, Lisa

From: NEIL STEFFEY <ty42@comcast.net>
Sent: Tuesday, August 13, 2024 7:29 AM
To: Contact Council
Subject: Saving urban canopy

I urge the Council to approve the Urban Tree Canopy policy as part of the 2024 Comprehensive Plan Update. With climate change impacts increasing and the need to protect our water quality, it is imperative that Snohomish County add these new policies to reduce and mitigate these impacts including protecting the tree canopy. Trees provide so many benefits to our homes, neighborhoods and communities. We must end the practice of clearcutting every inch of green land for development; we need to ensure that trees--existing and newly-planted--will provide a tree canopy that will benefit everyone now and in the future.

Having trees in our urban growth area communities is very important to me. We must stop the practice of clearcutting all our land for large residential subdivisions and commercial buildings.

We can build housing in our cities and existing urban growth areas to meet the demands of another 300,000 new people moving here in the next 20 years AND have trees in our urbanized communities.

I support the PDS and Planning Commission policy recommendations for the Urban Tree Canopy Policy, especially the goal of no net loss of 38 percent for tree canopy in our urban growth areas.

In order to build our green, equitable future, please ensure the policies will require the county to seek adequate funding for the program.

To ensure the policies are implemented and enforced, please change the word "should" to "shall" in Policies 9.A.3 and 9.A.4

In Policies 9.A.6 and 9.B.1, change periodic assessments by the County to annual assessments of urban tree canopy using the best available technology, in order to prevent the damages that could occur because of permitting mistakes and problems that occur after developments are built.

Thank you for your prompt action in this matter,
Jacque Steffey

Hickey, Lisa

From: Jennifer Grant <jennifer.grant@hcmp.com>
Sent: Monday, August 19, 2024 2:19 PM
To: Contact Council
Cc: Eco, Debbie; Lao, Elena; Hickey, Lisa; Danner, Cheri; Cristina Dugoni; Abigail Pearl DeWeese
Subject: County Council August 19th Public Hearing - Proposed Ordinances 24-032 and 24-065 - Written Testimony
Attachments: Comment Letter for Public Hearing v 1.pdf
Follow Up Flag: Follow up
Flag Status: Completed



Caution. Suspicious Attachment Types. This may be a phishing attempt.

On behalf of our client, Westburg LLC, attached is written testimony for consideration at tonight's Public Hearing on the Mixed Use Corridor legislation being considered under Proposed Ordinances 24-032 and 24-065.

Thank you for your consideration of this testimony.

Jennifer E. Grant

Paralegal

Illis Clark Martin & Peterson P.S.

999 Third Avenue | Suite 4600 | Seattle, WA 98104

d: **206.470.7684** | 206.623.1745 | f: 206.623.7789

jennifer.grant@hcmp.com | www.hcmp.com | vCard | view my bio

August 16, 2024

By Digital Transmission Only

Snohomish County Council
3000 Rockefeller Ave
M/S 609
Everett, WA 98201

Re: *Public Comment – Proposed Ordinances 24-032 and 24-065 implementing the new Mixed Use Corridor (“MUC”) Zone and related MUC Development Regulations*

Dear Councilmembers:

This comment letter is submitted in response to the MUC rezone and development code amendments being considered by Council at the August 19, 2024 Public Hearing. This law firm represents Westburg LLC (“Westburg”), which owns the Westburg RV and Manufactured Home Community located at 15905 Highway 99.

Westburg recognizes the County staff and Council’s hard work on this package, and supports both the proposed zoning change as well as many of the development standards that staff have proposed. The increased height limit from 60’ to 90’ in the base scenario is especially promising, because it will allow for the most efficient possible multifamily construction. Westburg fully supports that change.

More concerning, however, is the mandatory affordability (or “inclusionary zoning”) aspect of the package, which was problematic in the first draft but unfortunately is moving in the wrong direction. This part of the proposal has gone from bad to worse.

Westburg raised concerns with staff at the Draft Environmental Impact Statement (“DEIS”) stage, about the proposed requirement for 15% of new units to be affordable at 80% of Area Median Income (“AMI”). We explained that this mandate would be a *disincentive* for the development of new housing units, and suggested instead that the County embrace the Multifamily Housing Tax Exemption (“MFTE”) model that has been so successful in catalyzing affordable development in communities throughout our region.

Rather than moderating to address these concerns, the proposal has become even less workable. Though the County’s inclusionary zoning analysis found that “market conditions do support raising the AMI for rental units,” the staff’s recommendation was instead to lower the AMI to 60% instead of 80%. This worsens our concern that the package will prevent housing from being built where it is needed most.

As it stands today, the proposal forgets that mandatory affordability programs only deliver affordable units when market rate projects occur. When market-rate projects are disincentivized by an affordability mandate that is too heavy for market conditions to bear, the result is that neither market nor affordable housing is built. Again, an under-calibrated program will prevent housing from being built in the areas where the Council most desires it.

Rather than taking our word for it, please acknowledge the policy and industry experts:

“[W]idely accepted best practice . . . says affordability requirements must be calibrated to local market conditions to avoid making it financially infeasible to build housing . . . the unintended consequence of [an uncalibrated approach is] reducing homebuilding near transit, rather than increasing it.”¹

“The evidence is that [mandatory affordability] will actually send development outside of the transit station areas.”²

“[A] mandatory housing affordability requirement will challenge development, deterring the exact type of development we would all like to see. Washington has recently seen a dramatic drop in new housing development, [and] multifamily permit issuance in Q3 2023 was down more than 33% from the year prior. . . . [A]dding mandatory inclusionary requirements will further depress development activity and will push new development [to] where those inclusionary requirements would not apply.”³

“[W]e show new construction fell in the upzoned, affordability-mandated census blocks,” and “strong evidence of developers strategically siting projects away from [plots subject to mandatory affordability]—despite their upzoning—and instead to nearby blocks and parcels not subject to the program’s affordability requirements.”⁴

“We observe a sharp decline in the number of developments of target size following the [mandatory affordability] expansion and a proportionate increase in smaller developments below the [mandate’s] threshold. Our findings support [the] thesis that,

¹ Dan Bertolet, Senior Director of Housing and Urbanism at Sightline Institute, in testimony before the Washington State Senate Committee on Ways and Means (February 24, 2024).

² Bill Clarke, Washington REALTORS, in testimony before the Washington State Senate Committee on Ways and Means (February 24, 2024).

³ McKenzie Darr, NAIOP Washington (real property developer’s association), in testimony before the Washington State House Committee on Housing (January 9, 2024).

⁴ Jacob Krimmel & Betty Wang, *Upzoning with Strings Attached: Evidence from Seattle’s Affordable Housing Mandate*, Cityscape 25:2, 257-78 (2023).

Snohomish County Council
August 16, 2024
Page 3 of 3

with attractive alternative market segments, developers could leave the market covered by [mandatory affordability].”⁵

Please ask staff to revert the package’s affordability mandate to the prior proposal, or, better yet, raise the affordability level and reduce the unit percentage to something that would actually be economic in the current market.

With great appreciation and respect for the hard work completed in this process so far, please do not place Snohomish County’s pipeline for new transit-adjacent housing at risk with the current under-examined approach.

Very truly yours,

Abigail Pearl DeWeese

Abigail Pearl DeWeese
Attorney for Westburg LLC

APD:smd
E-Mail: abigail.deweese@hcmp.com
Direct Dial: (206) 470-7651
Fax: (206) 623-7789

ND: 24524.002 4875-3889-6855v2

⁵ Fei Li & Zhan Guo, *How Does an Expansion of Mandatory Inclusionary Housing Affect Housing Supply?*, Journal of the American Planning Association, 88:1, 83-96 (2022) .



MEMORANDUM

TO: Snohomish County Planning Commission

Dave Somers
County Executive

FROM: Frank Slusser, Senior Planner

SUBJECT: 2024 Update Future Land Use, Zoning, and Municipal Urban Growth Area Map Alternatives

DATE: September 11, 2023

I. INTRODUCTION

The purpose of this staff report is to outline and provide information on future land use (FLU), zoning, and Municipal Urban Growth Area (MUGA) map amendment alternatives studied for the 2024 Update of the Snohomish County GMA Comprehensive Plan. A briefing on the map alternatives will occur at the September 12, 2023, Planning Commission meeting.

II. BACKGROUND

The FLU Map is an integral part of the Land Use Element of the County's Growth Management Act (GMA) Comprehensive Plan. The Planning Commission was previously briefed on the policies and proposed policy amendments of the Land Use Element, including a community vision and new emphasis on social equity in the Equity Subelement. This report and briefing will cover the FLU Map and related maps that work together with the policies of the Land Use Element to further the vision and to accommodate and plan for growth in Snohomish County over the next twenty years. The primary drivers of the amendments proposed for the 2024 Update include state regulations, regional policies, countywide policies, and public input.

The GMA requires periodic review and update, if necessary, to local jurisdictions' comprehensive land use plans (RCW 36.70A.130). Review is required to ensure that urban growth areas (UGAs) contain adequate development capacity to meet the population and employment needs for the next twenty years along with the infrastructure and capital facilities necessary to support this growth. The last major update of the GMA comprehensive plan occurred in 2015. The county is required to complete this review and update by December 31, 2024.

VISION 2050 was adopted by the Puget Sound Regional Council (PSRC) and the multicounty planning policies (MPPs) therein were updated in 2020 to have a new focus on equity and continued attention on efficient use of urban land. An important part of VISION 2050 that guided development of the FLU Map alternatives was the Regional Growth Strategy, which identifies regional geographies that emphasize growth in areas served by high-capacity transit including regional metropolitan cities, core cities with regional growth centers, and the High Capacity Transit (HCT) Communities regional geography which

includes cities and unincorporated MUGAs that are planned for light rail, bus rapid transit (BRT), commuter rail, or ferry service. The Regional Growth Strategy also further reduces the growth target for the rural area of the county to just 4.5% of countywide growth between 2017 and 2050.

The countywide planning policies (CPPs) were revised in 2021 in coordination with Snohomish County Tomorrow (SCT) to incorporate the newly adopted VISION 2050. The CPPs also have a new focus on equity as well as a renewed emphasis on urban infill and compact urban growth.

Initial Growth Targets

The cooperative planning process of SCT also generated 2044 initial growth targets for the county, adopted in 2022, that allocate projected population and employment growth within cities and towns as well as unincorporated areas using the most recent Office of Financial Management's (OFM) twenty-year population projections published in 2022 and guidance from PSRC's VISION 2050. The initial growth targets indicate a need to increase urban growth accommodation and decrease rural growth accommodation. The initial population and employment growth targets were approved by the County Council on February 23, 2022, and are located in Appendix B of the CPPs.

Table 1, on the following page, shows the adopted initial 2044 population growth targets compared to 2021 Buildable Lands Capacity. This shows that some areas of the county and many of the cities and towns have capacity deficits comparing 2035 capacity to 2044 growth targets especially those in the Metropolitan Cities, Core Cities, and HCT Communities regional geographies. Highlighting in Table 1 indicates those unincorporated areas where there are capacity deficits.

Table 2 shows the adopted initial 2044 employment growth targets compared to 2021 Buildable Lands Capacity. This shows that many areas of the county and many of the cities and towns have capacity deficits comparing 2035 capacity to 2044 growth targets. Highlighting in Table 2 indicates those unincorporated areas where there are capacity deficits.

It should be noted that the 2035 horizon that was used in the 2021 Buildable Lands Report ends just prior to when light-rail service is planned to reach the unincorporated area in 2037. In the additional nine years to reach the new planning horizon of 2044, as light rail is extended further into the southwest part of the county, it is possible that larger scale redevelopment could occur beyond what was assumed in the 2021 Buildable Lands Report. More intensive redevelopment after 2035, similar to what was assumed in the 2021 Buildable Lands Report for the Mountlake Terrace and Lynnwood areas where light-rail service is scheduled to begin by 2024, could make up for part of the capacity deficits.

However, in many of those unincorporated MUGAs, particularly in the HCT Communities regional geography, there are significant capacity deficits. Those capacity deficits will need to be addressed by amendments to the future land use map and implementing rezones, along with new policies and regulations, to accommodate that additional level of growth within the areas assigned in the initial 2044 growth targets.

Regional Geography Area	2020 Census Pop (using Aug-26-2021 city bdys)	Adopted Initial Growth Targets		2021 Buildable Lands Report Capacity		2035 Capacity minus 2044 Target Surplus/(Deficit)
		Initial 2044 Population	2020-2044 Population Change	Total 2035 Pop Capacity (using Aug-26-2021 city bdys)	2020-2035 Additional Pop Capacity (using Aug-26-2021 city bdys)	
Metropolitan City	110,629	179,176	68,547	149,045	38,416	(30,131)
Everett City	110,629	179,176	68,547	149,045	38,416	(30,131)
Core Cities	57,773	96,089	38,316	85,076	27,303	(11,013)
Bothell City (Sno Co part)	19,205	32,355	13,150	29,035	9,830	(3,320)
Lynnwood City	38,568	63,735	25,167	56,041	17,473	(7,694)
HCT Communities	391,465	544,706	153,241	491,503	100,038	(53,203)
Arlington City	19,868	34,649	14,781	33,558	13,690	(1,091)
Edmonds City	42,853	55,966	13,113	52,046	9,193	(3,920)
Marysville City	70,714	99,822	29,108	91,084	20,370	(8,738)
Mill Creek City	20,926	24,813	3,887	22,066	1,140	(2,747)
Mountlake Terrace City	21,286	34,710	13,424	31,304	10,018	(3,406)
Mukilteo City	21,538	24,616	3,078	22,542	1,004	(2,074)
Bothell MUGA	34,299	45,226	10,927	41,769	7,470	(3,457)
Edmonds MUGA	4,007	4,915	908	4,851	844	(64)
Everett MUGA	47,690	64,826	17,136	56,837	9,147	(7,989)
Lynnwood MUGA	35,652	55,435	19,783	48,632	12,980	(6,804)
Mill Creek MUGA	52,049	65,426	13,377	58,996	6,947	(6,430)
Mukilteo MUGA	15,584	23,762	8,178	20,081	4,497	(3,681)
Larch Way Overlap	4,999	10,539	5,540	7,737	2,738	(2,801)
Cities & Towns (Remainder)	97,975	125,104	27,129	128,977	31,002	3,873
Brier City	6,560	7,100	540	6,933	373	(167)
Darrington Town	1,462	1,770	308	1,812	350	42
Gold Bar City	2,403	2,650	247	2,557	154	(93)
Granite Falls City	4,450	6,551	2,101	7,870	3,420	1,319
Index Town	155	173	18	188	33	15
Lake Stevens City	38,951	48,565	9,614	49,148	10,197	583
Monroe City	19,699	24,302	4,603	23,572	3,873	(730)
Snohomish City	10,126	12,878	2,752	12,886	2,760	8
Stanwood City	7,705	10,963	3,258	11,664	3,959	701
Sultan City	5,146	8,672	3,526	10,866	5,720	2,194
Woodway Town	1,318	1,480	162	1,481	163	1
Urban Unincorporated Areas (excluding HCT)	35,988	47,045	11,057	55,574	19,586	8,529
Arlington UGA	550	857	307	1,490	940	633
Brier MUGA	1,828	1,978	150	2,122	294	144
Darrington UGA	102	213	111	453	351	240
Gold Bar UGA	808	846	38	865	57	19
Granite Falls UGA	147	334	187	767	620	433
Lake Stevens UGA	2,072	2,387	315	2,487	415	100
Marysville UGA	197	198	1	198	1	-
Monroe UGA	1,567	1,974	407	3,097	1,530	1,123
Mountlake Terrace MUGA	23	30	7	42	19	12
Snohomish UGA	1,400	1,805	405	3,358	1,958	1,553
Stanwood UGA	142	432	290	870	728	438
Sultan UGA	55	204	149	769	714	565
Woodway MUGA	-	271	271	543	543	272
Lake Stickney Gap	11,042	14,842	3,800	15,295	4,253	453
Silver Firs Gap	15,841	20,034	4,193	22,152	6,311	2,118
Maltby UGA	164	590	426	1,014	850	424
Paine Field Area	50	50	-	50	-	-
UGA Total	693,830	992,120	298,290	910,175	216,345	(81,945)
Non-UGA (Rural/Resource)	134,127	144,190	10,063			
Total Snohomish County	827,957	1,136,309	308,352			

Notes: 2021 Buildable Lands Report data updated based on 2020 Census data and adjusted to August, 26, 2021, city and town boundaries.
Highlighting indicates those unincorporated areas where the 2035 capacity is less than the 2044 growth target.
Some columns or rows may not add due to rounding.

Table 2. 2044 Employment Targets and 2035 Capacity

Regional Geography Area	2019 Emp (using Aug-26-2021 city bdys)*	Adopted Initial Growth Targets		2021 Buildable Lands Report Capacity		2035 Capacity minus 2044 Target Surplus/(Deficit)
		Initial 2044 Employment	2019-2044 Employment Change	Total 2035 Emp Capacity (using Aug-26-2021 city bdys)	2019-2035 Additional Emp Capacity (using Aug-26-2021 city bdys)	
Metropolitan City	99,817	167,157	67,340	142,380	42,563	(24,777)
Everett City	99,817	167,157	67,340	142,380	42,563	(24,777)
Core Cities	44,728	75,344	30,616	65,059	20,331	(10,285)
Bothell City (Sno Co part)	16,100	24,805	8,705	22,522	6,422	(2,283)
Lynnwood City	28,628	50,540	21,912	42,537	13,909	(8,003)
HCT Communities	90,331	141,712	51,381	135,005	44,674	(6,707)
Arlington City	10,267	24,690	14,423	23,443	13,176	(1,247)
Edmonds City	14,174	17,232	3,058	16,722	2,548	(510)
Marysville City	15,310	32,926	17,616	31,434	16,124	(1,492)
Mill Creek City	6,787	7,523	736	7,168	381	(355)
Mountlake Terrace City	8,431	11,148	2,717	10,740	2,309	(408)
Mukilteo City	10,313	12,671	2,358	12,380	2,067	(291)
Bothell MUGA	2,214	2,756	542	2,576	362	(180)
Edmonds MUGA	247	353	106	319	72	(34)
Everett MUGA	6,412	8,317	1,905	7,631	1,219	(686)
Lynnwood MUGA	5,067	8,009	2,942	7,609	2,542	(400)
Mill Creek MUGA	5,780	7,379	1,599	6,808	1,028	(571)
Mukilteo MUGA	3,693	6,581	2,888	6,232	2,539	(349)
Larch Way Overlap	1,636	2,127	491	1,943	307	(184)
Cities & Towns (Remainder)	28,816	41,086	12,270	39,279	10,463	(1,807)
Brier City	495	609	114	525	30	(84)
Darrington Town	522	1,015	493	2,044	1,522	1,029
Gold Bar City	250	841	591	812	562	(29)
Granite Falls City	971	2,126	1,155	2,014	1,043	(112)
Index Town	27	30	3	27	-	(3)
Lake Stevens City	5,675	8,894	3,219	7,738	2,063	(1,156)
Monroe City	10,096	12,420	2,324	11,705	1,609	(715)
Snohomish City	5,842	7,666	1,824	7,272	1,430	(394)
Stanwood City	3,865	5,073	1,208	4,822	957	(251)
Sultan City	1,005	2,334	1,329	2,252	1,247	(82)
Woodway Town	68	80	12	68	-	(12)
Urban Unincorporated Areas (excluding HCT)	14,237	20,020	5,783	23,846	9,609	3,826
Arlington UGA	22	61	39	75	53	14
Brier MUGA	124	205	81	124	-	(81)
Darrington UGA	-	76	76	277	277	201
Gold Bar UGA	7	21	14	7	-	(14)
Granite Falls UGA	-	3	3	3	3	-
Lake Stevens UGA	57	122	65	57	-	(65)
Marysville UGA	664	757	93	664	-	(93)
Monroe UGA	164	241	77	165	1	(76)
Mountlake Terrace MUGA	-	-	-	-	-	-
Snohomish UGA	268	305	37	332	64	27
Stanwood UGA	192	726	534	1,482	1,290	756
Sultan UGA	-	1	1	-	-	(1)
Woodway MUGA	-	32	32	119	119	87
Lake Stickney Gap	911	1,618	707	1,313	402	(305)
Silver Firs Gap	1,834	3,268	1,434	1,866	32	(1,402)
Maltby UGA	3,623	4,629	1,006	7,352	3,729	2,723
Paine Field Area	6,371	7,955	1,584	10,010	3,639	2,055
UGA Total	277,929	445,320	167,391	405,569	127,640	(39,751)
Non-UGA (Rural/Resource)	17,887	22,314	4,427			
Total Snohomish County	295,816	467,634	171,818			

Notes: 2021 Buildable Lands Report data adjusted to August, 26, 2021, city and town boundaries.

Highlighting indicates those unincorporated areas where the 2035 capacity is less than the 2044 growth target.

Some columns or rows may not add due to rounding.

*Suppressed values in unincorporated urban areas zeroed out and added to city values to match previously published UGA and MUGA totals.

The March 2023 Washington State Department of Commerce Medium Projected Housing Needs by County (Medium OFM Projection, 2044) report indicates **143,182** new housing units are needed in Snohomish by 2044.

Projected Housing Needs by County (Medium OFM Projection, 2044)

County	Total Housing Need	0-30% Non-PSH	0-30% PSH	30-50%	50-80%	80-100%	100-120%	120%+	Emergency Housing
Adams	1,753	276	200	197	308	127	88	532	19
Asotin	1,360	207	218	461	142	63	57	212	35
Benton	35,822	4,037	2,977	6,371	4,819	2,718	3,082	12,668	130
Chelan	10,032	1,228	912	1,725	1,878	863	728	2,990	294
Clallam	5,847	1,654	751	1,504	712	248	186	794	437
Clark	103,475	12,030	7,393	16,188	15,661	9,011	8,334	34,958	3,821
Columbia	98	48	30	20	0	0	0	0	1
Cowlitz	10,000	2,704	1,378	2,425	872	409	423	1,789	173
Douglas	6,755	912	0	826	1,059	573	668	2,681	33
Ferry	184	110	54	20	0	0	0	0	22
Franklin	20,668	1,786	1,904	2,408	3,729	1,935	1,717	7,229	150
Garfield	82	63	6	13	0	0	0	0	2
Grant	17,185	1,743	813	2,448	3,039	1,449	1,382	6,311	93
Grays Harbor	4,152	1,797	1,119	1,183	41	18	0	0	188
Island	8,473	970	833	1,754	1,476	689	654	2,099	262
Jefferson	3,985	1,999	247	508	444	174	221	742	356
King	836,591	84,873	42,993	50,971	25,309	17,893	18,734	95,316	59,616
Kitsap	24,066	5,494	2,646	4,589	3,144	1,893	1,365	5,433	1,280
Kittitas	5,217	1,870	570	1,011	352	271	261	882	0
Klickitat	2,319	565	135	476	387	85	145	576	89
Lewis	5,598	1,799	890	1,163	618	220	170	788	478
Lincoln	203	8	117	86	0	6	0	0	1
Mason	7,848	1,009	1,048	1,499	995	442	347	2,308	89
Okanogan	2,036	873	443	379	160	51	19	107	98
Pacific	1,399	954	217	144	55	5	4	20	255
Pend Oreille	911	221	84	146	146	58	43	213	0
Pierce	135,652	16,098	20,142	22,874	26,285	9,624	8,776	37,883	7,218
San Juan	3,097	566	48	300	418	250	232	1,069	34
Skagit	16,914	2,811	1,607	2,817	2,418	1,282	1,136	4,843	281
Skamania	1,672	569	61	169	190	143	130	388	69
Snohomish	143,182	26,836	14,567	20,800	14,149	11,296	13,246	42,298	9,211
Spokane	79,974	19,416	5,721	13,147	8,117	4,327	3,552	16,994	2,992
Stevens	4,857	1,188	488	450	622	371	314	1,424	41
Thurston	52,456	8,576	3,591	8,264	7,878	4,168	4,162	15,716	921
Wahkiakum	334	11	109	37	40	17	19	101	9
Walla Walla	2,731	1,149	727	787	43	7	58	0	0
Whatcom	34,377	7,929	3,416	6,708	3,776	2,194	2,115	8,239	508
Whitman	3,591	3,011	300	280	0	0	0	0	39
Yakima	21,078	3,563	4,198	4,974	2,264	1,342	872	3,865	1,318
TOTAL	1,106,836	220,539	122,469	186,318	124,928	73,164	74,680	310,740	91,347

Questions and comments on this work may be directed to the project manager, Laura Hodgson, at laura.hodgson@commerce.wa.gov or 360-764-3143.

Table 4-1 of the county's 2023 Housing Characteristics and Needs Report (Housing Needs "analysis" report), reports the number of additional housing units needed by 2044 as **167,443 additional units**:

PLANNING COMMISSION COMMENTS: 2024 COMPREHENSIVE PLAN UPDATE DRAFT HOUSING ELEMENT, 2024 COMPREHENSIVE PLAN UPDATE DRAFT ENVIRONMENTAL IMPACT STATEMENT AND DOCKET XXI

DRAFT 2024 HOUSING ELEMENT

The draft 2024 Housing Element (“HE”) needs to be revised to contain: 1) requirements and policies to *accommodate* housing affordable to all economic segments of the population of this county 2) the housing needs figure provided by the Washington State Department of Commerce and 3) a Land Capacity Analysis (“LCA”) for the entire county that identifies sufficient capacity of land for the 2020 – 2044 planning period projected growth. The 2024 Comprehensive Plan Update Draft Environmental Impact Statement (“DEIS”) is erroneous and incomplete.

RCW 36.70A.020 (4) provides that Snohomish County “Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock”, when developing and adopting comprehensive plans and development regulations. The draft county HE housing policies **do not contain county requirements and policies to accommodate housing affordable to all economic segments of the entire county population.** The county’s 2023 Housing Characteristics and Needs Report, referenced in the county draft Housing Element, also does not contain provisions to *accommodate* housing affordable to all economic segments of the entire county population, because there is no 2020 – 2044 LCA, etc.

ESSHB 1220 and RCW 36.70A.070 (2) (a) requires a housing element that:

- (c) Includes an inventory and analysis of existing and projected housing needs **that identifies the number of housing units necessary to manage projected growth, as provided by the department of commerce.** Emphasis added

The draft *Housing Element* states: “The inventory and analysis ((is)) are included in the Housing Needs Analysis technical report prepared for the Comprehensive Plan. ((It)) The report includes an inventory and analysis of existing and projected housing needs for the planning horizon. **Table HO-1** summarizes the permanent housing needs by income level for *unincorporated Snohomish County*.”¹

Table HO-1. Snohomish County Unincorporated Permanent Housing Needs by Income Level (Area Median Income)

	Total	0-30% Non PSH	0-30% PSH	>30- 50%	>50- 80%	>80- 100%	>100- 120%	>120%
Estimated 2020 Housing Supply	<u>132,804¹</u>	<u>2,444</u>	<u>546</u>	<u>13,443</u>	<u>21,303</u>	<u>25,010</u>	<u>25,631</u>	<u>44,427</u>
Housing Needs 2020-2044	<u>50,604</u>	<u>10,644</u>	<u>5,012</u>	<u>11,952</u>	<u>10,951</u>	<u>5,180</u>	<u>161</u>	<u>6,704</u>

¹The total estimated 2020 housing supply number according to the Washington State Department of Commerce Housing For All Planning Tool (2023)

PSH = Permanent supportive housing

¹ DRAFT - SNOHOMISH COUNTY COMPREHENSIVE PLAN · HOUSING ELEMENT · PAGE 2

“Following these steps arrives at a total 2044 housing unit need of 484,791.”... “resulting in a countywide need of 167,443 housing units for the period 2020-2044.”²

Table 4-1 Projected Housing Need³

Jurisdiction	2020 Housing Units (Excluding Seasonal Units)	2044 Total Housing Units Needed	Additional Units Required	% of Countywide 2020-2044 Housing Unit Need
Arlington City	7,689	15,483	7,794	4.65%
Bothell City (Sno Co Part)	7,343	14,325	6,982	4.17%
Brier City	2,355	2,894	539	0.32%
Darrington Town	648	802	154	0.09%
Edmonds City	19,005	28,073	9,068	5.42%
Everett City	47,023	85,580	38,557	23.03%
Gold Bar City	892	1,059	167	0.10%
Granite Falls City	1,579	2,566	987	0.59%
Index Town	80	90	10	0.01%
Lake Stevens City	13,473	18,388	4,915	2.94%
Lynnwood City	16,132	30,183	14,051	8.39%
Marysville City	25,723	39,976	14,253	8.51%
Mill Creek City	8,961	11,578	2,617	1.56%
Monroe City	6,163	8,379	2,216	1.32%
Mountlake Terrace City	9,133	16,816	7,683	4.59%
Mukilteo City	8,565	10,711	2,146	1.28%
Snohomish City	4,327	5,873	1,546	0.92%
Stanwood City	2,929	4,559	1,630	0.97%
Sultan City	1,883	3,308	1,425	0.85%
Woodway Town	476	574	98	0.06%
Total Incorporated Areas	184,379	301,218	116,839	69.78%
Unincorporated Urban Areas	83,440	128,849	45,409	27.12%
Unincorporated Rural Areas	49,529	54,724	5,195	3.10%
Total Unincorporated	132,969	183,573	50,604	30.22%
Total Snohomish County	317,348	484,791	167,443	100.00%

The county draft Housing Element does not include the required department of commerce projected housing needs figure.

² County 2023 Housing Characteristics and Needs Report, pg 59.

³ County 2023 Housing Characteristics and Needs Report, pg 60.

ESSHB 1220 and RCW 36.70A.070 (2) requires a housing element that:

Identifies sufficient capacity of land for housing, including, but not limited to, government-assisted housing, housing for (low-income families) moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, (and) group homes (and), foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes. Emphasis added

The county **draft 2024 HE** states that the HE is “closely tied to the county’s land capacity evaluation program... Residential land uses are analyzed to assure that there is sufficient land at a variety of densities to accommodate housing needs at all income levels”⁴ and **references RCW 36.70A.215**⁵, the GMA Review and Evaluation Program. **The GMA Review and Evaluation Program, otherwise known as the [2021] Buildable Lands Report (BLR) is not a 2020 – 2044 Land Capacity Analysis.** The BLR “looks back” at the functioning of the current comprehensive plan while **the LCA is utilized to ensure sufficient land capacity of land suitable for development when comprehensive plans and development regulations are updated:**

The purpose, requirements, and timing of the Review & Evaluation Program can be confused with the requirement for counties and cities to complete a Land Capacity Analysis as part of a periodic update to the comprehensive plan... The primary difference between these two requirements is that the Review & Evaluation Program looks back to determine how your current comprehensive plan is functioning while the Land Capacity Analysis requirements are utilized to ensure sufficient land capacity of land suitable for development when comprehensive plans and development regulations are updated. In other words, one looks back while the other looks forward.⁶

Figure 5. Legal Requirements Table

	Review & Evaluation Program	Land Capacity Analysis
Important statute and rule references	<p>RCW 36.70A.215 – Review & Evaluation Program;</p> <p>WAC 365-196-315 – Buildable Lands review and evaluation</p>	<p>RCW 36.70A.115 – Comprehensive Plans and development regulations must provide sufficient capacity for development</p> <p>RCW 36.70A.130 – Comprehensive Plans shall be revised to accommodate the urban growth projected to occur in the county for the succeeding twenty-year period</p> <p>WAC 365-196-325 – Providing sufficient land capacity suitable for development</p>
Required to perform	Seven Buildable Lands counties and the cities within those counties identified in 36.70A.215(s). The requirements are optional for all other counties.	All counties and cities that are required or choose to plan under the Growth Management Act (RCW 36.70A.115), including those cities and counties subject to the Buildable Lands requirements.
Purpose	RCW 36.70A.215(1)(a) – “Determine whether a county and its cities are achieving urban densities within urban growth areas by comparing growth and development assumptions, targets, and objectives contained in the countywide planning policies and the county and city comprehensive plans with actual growth	RCW 36.70A.110(2) - Based upon the growth management population projection made for the county by the office of financial management, the county and each city within the county shall include areas and densities sufficient to permit the urban growth

⁴ Draft Housing Element, pg 6,7.

⁵ Draft Housing Element, pg 6.

⁶ 2018 Department of Commerce Review and Evaluation Program - Buildable Lands Guidelines, pg 13., Dept of Commerce GUIDANCE FOR UPDATING YOUR HOUSING ELEMENT (AUGUST 2023) pg 17, WAC 365-196-325 Providing sufficient land capacity suitable for development.

Guidance for Evaluating Land Capacity to Meet All Housing Needs

Introduction

The Growth Management Act (GMA) requires comprehensive plans to include a housing element that identifies “sufficient capacity of land” to accommodate all projected housing needs during the horizon period of the plan (RCW 36.70A.070(2)(c)). HB 1220 amended this section of the Act to require the housing element to include explicit consideration of capacity for the following household needs and building types:

- Moderate, low, very low, and extremely low-income households;
- Permanent supportive housing;
- Emergency housing and emergency shelters; and
- Duplexes, triplexes and townhomes (within an urban growth area boundary).

The **Department of Commerce** states in their 2023 Housing Element guidance that **a county LCA and changes to land capacity must be completed by the county’s periodic update deadline**: “Counties and cities must conduct a Land Capacity Analysis (LCA) to measure and document capacity for new housing development on vacant, partially used or under-developed lands. This analysis considers the potential for land within a community’s boundaries to accommodate new housing growth, given what is allowed under current zoning and development regulations and what can reasonably be anticipated based on past development and factors that may cause trends to change in the future. WAC 365-196-310(4)(b)(ii). **Under GMA, jurisdictions must adopt and implement any necessary changes to achieve the land capacity necessary to accommodate all housing needs by their comprehensive plan periodic update deadline. RCW 36.70A.130 (1) (a).**”⁷

Unlike a Buildable Lands Analysis, which looks backward at performance under the previous period’s comprehensive plan, **an LCA looks forward** to the land uses and development types planned for the next planning period, as described in WAC 365-196-325.⁸ RCW 36.70A.115.

The county’s draft **Housing Element erroneously states** that the county Housing Needs Report includes the analysis of the adequacy of the capacity of lands zoned in various residential categories to meet the needs of all economic segments of the population, and is referred to as residential land use needs analysis (RLUNA).⁹

The Needs Analysis also includes the analysis of the adequacy of the capacity of lands zoned in various residential categories to meet the needs of all economic segments of the population. This analysis is called the residential land use needs analysis (RLUNA). Additional information on housing supply and demand, both countywide and by jurisdiction, is found in the Introduction of the Comprehensive Plan, and in the ((*Snohomish County*)) ***Housing Characteristics and Needs in Snohomish County Report*** prepared in collaboration with Snohomish County cities.

⁷ Department of Commerce GUIDANCE FOR UPDATING YOUR HOUSING ELEMENT (AUGUST 2023), pg 17.

⁸ Department of Commerce GUIDANCE FOR UPDATING YOUR HOUSING ELEMENT (AUGUST 2023), pg 17.

⁹ DRAFT - SNOHOMISH COUNTY COMPREHENSIVE PLAN · HOUSING ELEMENT · PAGE 3.

The county 2023 **Housing Characteristics and Needs Report** (“Needs Analysis”) states that the Department of Commerce has not provided “guidance on land capacity analysis”¹⁰

As a part of the changes to housing law made by HB 1220, The Department of Commerce has been tasked with providing guidance on land capacity analysis. As of this writing has not yet completed that guidance; the RLUNA process may change from the model below.

The county admits that LCA “planning” has not been included in the County 2023 Housing Characteristics and Needs Report when it states that **planning for 2044 growth targets** and capacity should be considered.¹¹

Land use planning and housing planning for 2044 should consider both the housing unit growth targets and the available residential capacity within the planning jurisdiction.

The county admits that LCA planning has not been included in the draft Housing Element when it states that HE policies and measures which it **intends to implement** to ensure that sufficient land for housing is identified¹²

Also included in the Housing Element are policies and measures which the county intends to implement to ensure that sufficient land for housing is identified and will be available in an efficient and competitive land market.

County 2023 Housing Characteristics and Needs Report, Chapter 6, Residential Land Supply and **Housing Capacity**, first proclaims: “The demand for additional housing required to accommodate projected population growth will not be met unless there is an **adequate supply and capacity of residentially zoned land** available for development”¹³. And goes on to State: “The information in this chapter is **derived from the 2021 Buildable Lands Report** (BLR) recently completed for Snohomish County.”¹⁴ The County 2023 Housing Characteristics and Needs Report continues: “The latest BLR, pursuant to the GMA specific requirements, compares the supply and capacity of available residential land with the **projected demand for housing through the year 2035**.”¹⁵ Emphasis added

A **BLR is not a Land Capacity Analysis**. The BLR Review & Evaluation Program looks back to determine how a current comprehensive plan is functioning while the Land Capacity Analysis requirements are utilized to ensure sufficient land capacity of land suitable for development when comprehensive plans and development regulations are updated. In other words, one looks back while the other looks forward.¹⁶

Another problem is that the 2024 Comprehensive Plan Update includes projected demand for housing through the year 2044, not 2035. County 2023 Housing Characteristics and Needs Report goes on to state: “That projected demand is expressed as population growth targets that were **‘reconciled’** in

¹⁰ County 2023 Housing Characteristics and Needs Report, Page 144.

¹¹ County 2023 Housing Characteristics and Needs Report, pg 123.

¹² DRAFT - SNOHOMISH COUNTY COMPREHENSIVE PLAN · HOUSING ELEMENT · PAGE 5.

¹³ 2023 Housing Characteristics and Needs Report, Page 87.

¹⁴ 2023 Housing Characteristics and Needs Report, Page 87.

¹⁵ 2023 Housing Characteristics and Needs Report, Page 87.

¹⁶ 2018 Department of Commerce Review and Evaluation Program - Buildable Lands Guidelines, pg 13., Dept of Commerce GUIDANCE FOR UPDATING YOUR HOUSING ELEMENT (AUGUST 2023) pg 17, WAC 365-196-325 Providing sufficient land capacity suitable for development.

2016 and were reflected in the county and city comprehensive plans that were all updated during the previous GMA update... **A similar process will occur following the completion of the current round of comprehensive plan updates due in 2024. The updated plans must be capable of accommodating the new state projections of future growth to the year 2044.**¹⁷

The “**similar process**” referred to above is provided by the Snohomish County **Countywide Planning Policies (CPP) Target Reconciliation**: “Once the GMA comprehensive plan updates of jurisdictions in Snohomish County are **adopted**, the Snohomish County Tomorrow (SCT) process shall be used to review and, **if necessary, adjust the population, housing, and employment growth targets**”. Appendix C – Growth Target Procedure Steps for GF-5¹⁸. **This is in direct conflict with RCW 36.70A.130 (1) (a)**, requiring under GMA, **jurisdictions must adopt and implement any necessary changes to achieve the land capacity necessary to accommodate all housing needs by their comprehensive plan periodic update deadline.**¹⁹

Target Reconciliation: Once the GMA comprehensive plan updates of jurisdictions in Snohomish County are adopted, the Snohomish County Tomorrow (SCT) process shall be used to review and, if necessary, adjust the population, housing, and employment **growth targets contained in Appendix B of the CPPs.**²⁰ Emphasis added

The county’s CPP ‘reconciliation process’ can be used **to manipulate** the buildable land capacity by simply **reducing the adopted growth targets, “based on the land supply, permitted densities”, etc.**²¹ Reducing growth targets could avoid a need to expand the county Urban Growth Area, etc. Problem for the county ‘reconciliation’ plan is that RCW 36.70A.070 (2) (a) requires a housing element that **identifies the number of housing units necessary to manage projected growth, as provided by the department of commerce.** That Department of Commerce housing growth “target” cannot be changed by the county.

The County and cities shall jointly review the preferred growth alternatives in adopted local comprehensive plans for **discrepancies with the target allocation** associated with the County's preferred plan alternative.²² Emphasis added

Based on the land supply, permitted densities, capital facilities, urban service capacities and other information associated with the preferred growth alternatives of adopted local comprehensive plans, the Planning Advisory Committee (PAC) of SCT **shall recommend to the SCT Steering Committee a reconciled 20-year population, housing, and employment allocation.**²³ Emphasis added

The county’s CPP ‘reconciliation process’ **requires the county council to replace the adopted growth targets with SCT “reconciled” new CPP Appendix B “growth targets”**. The CPP ‘reconciliation process’ directly conflicts with GMA requirements that the county **must adopt and implement any land capacity provisions prior to the update deadline, RCW 36.70A.130 (1) (a)²⁴, and RCW 36.70A.070 (2)**

¹⁷ 2023 Housing Characteristics and Needs Report, Page 87.

¹⁸ Snohomish County Countywide Planning Policies, pg 72.

¹⁹ Department of Commerce GUIDANCE FOR UPDATING YOUR HOUSING ELEMENT (AUGUST 2023), pg 17.

²⁰ Snohomish County Countywide Planning Policies, pg 72.

²¹ Snohomish County Countywide Planning Policies, pg 72.

²² Snohomish County Countywide Planning Policies, pg 72.

²³ Snohomish County Countywide Planning Policies, pg 72.

²⁴ Department of Commerce GUIDANCE FOR UPDATING YOUR HOUSING ELEMENT (AUGUST 2023), pg 17.

(a) requiring the county to use the Department of Commerce housing growth figure for the 20 year planning period to 2044.

The County Council shall consider the recommendation of the Steering Committee and **shall replace Appendix B of the CPPs with a reconciled 20-year population, housing, and employment allocation.**²⁵ Emphasis added

DRAFT 2024 COMPREHENSIVE PLAN UPDATE ENVIRONMENTAL IMPACT STATEMENT

The county’s last comprehensive plan update was required to be completed in 2015. The County produced a Land Capacity Analysis for the 2015 update, dated June 10, 2015. The June 10, 2015 LCA was “updated on June 17, 2015 consistent with the final Future Land Use Map adopted by the Snohomish County Council on June 10, 2015.”²⁶ The county claimed the 2015 LCA was consistent with Washington State Department of Commerce guidance documents for UGA sizing and land capacity analyses, according to the county’s 2015 LCA report:²⁷

This report describes the results of Snohomish County’s updated residential and employment land capacity analysis for the final UGA adopted by the Snohomish County Council on June 10, 2015 as part of the county’s 2015 GMA plan review and update.

The analysis is consistent with previous capacity analyses conducted by the county for its original GMA plan adoption in 1995, and for its major plan update in 2005. It is consistent with relevant Washington State Department of Commerce guidance documents for UGA sizing and land capacity analyses.

The Purpose of the county’s Countywide Planning Policies (CPPs) is to establish a countywide framework for developing and adopting county, city, and town comprehensive plans.²⁸ The CPP defines a Land Capacity Analysis as establishing “a **new 20 year urban land supply** for accommodating the urban growth targets.”²⁹

Countywide Planning Policies (CPPs) establish a countywide framework for developing and adopting county, city, and town comprehensive plans.

Land Capacity Analysis: A land capacity analysis focuses on the reestablishment of a new 20 year urban land supply for accommodating the urban growth targets. As such, it fulfills the Growth Management Act “show your work” requirement for the sizing of Urban Growth Areas for future growth. (See DP-1 and RCW 36.70A.110(2))

WAC 365-196-325 “Providing sufficient land capacity suitable for development”, includes statutory requirements for completing a land capacity analysis:

(1) Requirements.

(a) **RCW 36.70A.115** requires counties and cities to ensure that, taken collectively, comprehensive plans and development regulations provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and

²⁵ Snohomish County Countywide Planning Policies, pg 72.

²⁶ 2015 LCA cover page.

²⁷ 2015 LCA pg 1.

²⁸ CPP pg 3.

²⁹ CPP pg 86.

employment growth, including the accommodation of, as appropriate, the medical, governmental, educational, institutional, commercial, and industrial facilities related to such growth, as adopted in the applicable countywide planning policies and consistent with the 20-year population forecast from the office of financial management. **To demonstrate this requirement is met, counties and cities must conduct an evaluation of land capacity sufficiency that is commonly referred to as a "land capacity analysis."** Emphasis added

The only reference to a Land Capacity Analysis in the county 2023 Housing Characteristics and Needs Report is: "The Department of Commerce has been tasked with providing guidance on land capacity analysis. As of this writing has not yet completed that guidance".³⁰ The only reference to a Land Capacity Analysis in the county draft housing element is: "The land capacity analysis of urban and rural unincorporated areas shall continue to include housing data."³¹

This is part of the 2023 Department of Commerce guidance on Land Capacity Analysis:

What is a land capacity analysis?

Counties and cities must conduct a Land Capacity Analysis (LCA) to measure and document capacity for new housing development on vacant, partially used or underdeveloped lands. This analysis considers the potential for land within a community's boundaries to accommodate new housing growth, given what is allowed under current zoning and development regulations and what can reasonably be anticipated based on past development and factors that may cause trends to change in the future.

Unlike a Buildable Lands Analysis, which looks backward at performance under the previous period's comprehensive plan, an LCA looks forward to the land uses and development types planned for the next planning period, as described in WAC 365-196-325. While the focus of an LCA is on the potential for new development under current regulations and zoning, past trends and other factors should be considered to ensure that projected capacity is realistic. RCW 36.70A.070(2)(d) includes separate requirements for analyzing barriers and limitations that prevent new development from achieving planned densities and housing types.

These requirements are covered in Chapter 4. Adequate provisions, and are separate from the LCA.

The county's 2015 Land Capacity Analysis is the county's most recent LCA. The Department of Commerce includes guidance for estimating and providing sufficient land capacity. "In formulating land capacity analyses, counties and cities should consider data on past development, as well as factors which may cause trends to change in the future."³² There is no LCA included in the current 2024 update documents, no data on past development and no factors which may cause trends to change in the future. **There has been little or no population capacity changes to the county UGA since 2015.**

³⁰ 2023 Housing Characteristics and Needs Report, pg 144.

³¹ Draft Housing Element, pg 17.

³² WAC 365-196-310 (4)

The 2015 Land Capacity Analysis UGA population capacity is 876,743. The Countywide Planning Policies 2044 UGA population growth target is 992,120³³; a (115,377) population capacity shortfall.

2035 Population Growth Targets for Cities and UGAs (from GPP APPENDIX D, Table 1, Adopted by County Council on June 10, 2015)					Population Capacity Estimates		
Area	2011 Population Estimates	2035 Population Targets	2011-2035 Population Growth		2035 Total Population Capacity	Additional 2011-2035 Pop Capacity	Pop Capacity Surplus vs. Shortfall ()
			Amount	Pct. of Total County Growth			
Non-S.W. County UGA	161,256	233,097	71,809	30.1%	237,400	76,112	4,303
Arlington UGA	18,469	26,002	7,512	3.2%	25,708	7,214	(299)
Arlington City	17,966	24,937	6,971	2.9%	24,276	6,312	(659)
Unincorporated	523	1,065	541	0.2%	1,435	902	361
Darrington UGA	1,420	2,161	741	0.3%	2,375	955	214
Darrington Town	1,345	1,764	419	0.2%	1,764	419	0
Unincorporated	75	397	322	0.1%	611	536	214
Gold Bar UGA	2,909	3,319	411	0.2%	3,350	442	31
Gold Bar City	2,060	2,424	364	0.2%	2,424	364	-
Unincorporated	849	895	47	0.0%	927	78	31
Granite Falls UGA	3,517	6,517	3,000	2.1%	6,912	3,396	396
Granite Falls City	3,370	7,342	4,472	1.9%	7,642	4,472	-
Unincorporated	147	675	528	0.2%	1,071	924	396
Index UGA (unincorporated)	160	220	40	0.0%	220	40	-
Lake Stevens UGA	33,218	46,300	13,162	5.5%	40,397	15,179	2,017
Lake Stevens City	28,210	39,340	11,130	4.7%	39,340	11,130	-
Unincorporated	5,008	7,040	2,032	0.9%	9,057	4,049	2,017
Maltby UGA (unincorporated)	NA	NA	NA	NA	NA	NA	NA
Marysville UGA	60,569	67,796	26,929	11.3%	67,796	26,929	-
Marysville City	60,660	67,569	26,929	11.3%	67,569	26,929	-
Unincorporated	209	209	-	0.0%	209	-	-
Monroe UGA	18,806	24,754	5,943	2.5%	25,611	6,805	657
Monroe City	17,351	22,102	4,751	2.0%	22,102	4,751	-
Unincorporated	1,455	2,652	1,197	0.5%	3,509	2,054	657
Snohomish UGA	16,559	14,484	3,935	1.7%	15,057	4,493	563
Snohomish City	9,200	12,269	3,069	1.3%	12,269	3,069	-
Unincorporated	1,359	2,204	846	0.4%	2,785	1,409	563
Stanwood UGA	6,353	11,065	4,732	2.0%	11,606	5,255	523
Stanwood City	6,220	10,116	3,896	1.6%	10,116	3,896	-
Unincorporated	133	969	836	0.4%	1,492	1,359	523
Sultan UGA	4,969	6,369	3,399	1.4%	6,369	3,400	1
Sultan City	4,655	7,345	2,690	1.1%	7,345	2,690	-
Unincorporated	314	1,024	709	0.3%	1,024	710	1
S.W. County UGA	434,425	532,035	147,610	62.0%	639,343	204,918	57,307
Incorporated S.W.	261,506	363,452	101,946	42.8%	373,790	117,254	13,336
Bothell City (part)	16,570	23,510	6,940	2.9%	23,510	6,940	-
Brierley City	6,201	7,011	810	0.3%	7,011	810	-
Edmonds City	39,600	45,550	5,750	2.4%	45,550	5,750	-
Everett City	103,100	164,812	61,712	25.9%	160,150	77,050	15,336
Lynnwood City	35,660	54,404	18,544	7.8%	54,404	18,544	-
Mill Creek City	18,370	20,196	1,826	0.5%	20,196	1,826	-
Mountlake Terrace City	19,990	24,767	4,777	2.0%	24,767	4,777	-
Mukilteo City	20,310	21,912	1,502	0.6%	21,612	1,502	-
Woodway Town	1,305	1,359	64	0.0%	1,359	64	-
Unincorporated S.W.	172,919	218,584	45,665	19.2%	260,553	87,664	41,969
UGA Total	595,713	815,132	219,419	92.1%	876,743	261,030	61,611
City Total	412,723	579,419	166,696	70.0%	595,096	181,375	14,679
Unincorporated UGA Total	182,990	235,713	52,723	22.1%	282,645	89,655	46,932

NOTES: All estimates and targets above are based on December 13, 2012 city boundaries; NA = not applicable.
 Unincorporated UGA capacity estimates are based on the County's future land use map adopted by the County Council on June 10, 2015.
 City capacity estimates are based on the best available information from cities as of June 9, 2015.

County comprehensive plans and development regulations must provide sufficient land capacity for development. RCW 36.70A.115. The county's adopted 2044 UGA population growth targets are above

³³ CPP Appendix B Growth Targets, pg 68.

the county UGA population capacity by (115,377). County comprehensive plans and development regulations do not provide sufficient land capacity for the projected 2020 – 2044 growth.

DOCKET XXI

Docket XXI Alternative 2 & 3 provide a small increase in population capacity. The population capacity increase of Alternatives 2 & 3 are not sufficient to overcome the 2044 UGA population capacity shortfall:

Alt. 2 DOCKET NUMBER, AREA & DESCRIPTION	POP. CAPACITY	EMP. CAPACITY	RES. EXPANSION ACRES	EMPLOYMENT ACRES
	INCREASE	INCREASE		
DR1 - DARRINGTON SWAP	38	-140	-94.2	
SW10 - Redesignate 14 acres from UI to Urban Center, SWUGA	526	116		
SW12 - Amend SCC 30.23.040(14) to increase Bld heights in area east of SR 99				
SW17 - Adjust Woodway UGA to include existing town limits & pier				
Motion No. 22-096 - No FLUM/zoning changes, new policies related to urban tree canopy				
Motion No. 22-097 - New policies related to broadband				
Motion No. 22-134 - Expand SWUGA 300 acres for UMDR and P/I uses	1,951	208	271	30
TOTAL	2,515.00	184.00	176.8	30

Alt. 3 DOCKET NUMBER, AREA & DESCRIPTION	POP. CAPACITY	EMP. CAPACITY	RES. EXPANSION ACRES	EMPLOYMENT ACRES
	INCREASE	INCREASE		
DR1 - DARRINGTON SWAP	38	-140	-94.2	
LS2 - EXPAND Lake Stevens UGA 3.42 acres UI USE		6		
MALT1 - Expand Maltby UGA 10.7 acres for UI use		73		10.7
MV2 - Expand Marysville UGA 182.5 acres for UI use		430		182.5
MON2 - Expand Monroe UGA 22 acres for ULDR use	179		22	
SW10 - Redesignate 14 acres from UI to Urban Center, SWUGA	1,105	313		
SW12 - Amend SCC 30.23.040(14) to increase Bld heights in area east of SR 99				
SW14 - Expand Southwest UGA 10.75 acres for UMDR use	254		10.75	
SW17 - Adjust Woodway UGA to include existing town limits & pier				
Motion No. 22-090 - Expand SWUGA 789 acres for ULDR, UMDR, UHDR, and P/IU uses*1	5,488	370	649	89
Motion No. 22-095 - Expand Lake Stevens UGA 313.5 acres for ULDR, P/I, UCOM uses	759	15	250	63
Motion No. 22-098 - Expand Maltby UGA 255 acres for P/IU, UI, and UCOM uses	86	671	24	232
Motion No. 22-099 - Expand Monroe UGA 68 acres for ULDR use	553		68	
TOTAL	8,462.00	1,738.00	929.55	577.2

*1 - 51 ACRES TIMBER CREEK OPEN SPACE, 89 ACRES P/IU, WITHIN EXPANSION AREA
MOTION NO. 22-090, March 23, 2022.

I support the Alternative 3 Docket XXI proposals. The county Alternative 3 UGA population target of 1,010,609 and a UGA expansion population increase of 8,462 still leaves a UGA population deficiency of (125,404).

The DEIS capacity data states: “For incorporated jurisdictions, the number reported for capacity equals the 2021 Buildable Lands Report 2035 capacity or the **adopted Initial 2044 target, whichever is greater.**” (see below). Population growth targets are not buildable land capacity. Growth targets are **projections** of future population changes. Buildable land capacity is the supply of land, such as vacant land that is available for development. The DEIS contains land capacity figures that are falsely equal to growth targets.³⁴ (see below) Growth targets are simply based on **predictions of growth that may occur.**

The DEIS claims Everett 2044 population capacity as 179,176 or equal to the 2044 population growth target (see below). The 2021 BLR indicates Everett 2035 population capacity as 151,063 (see below). **RCW 36.70A.215** the BLR statute provides: “**The zoned capacity of land alone is not a sufficient**

³⁴ DEIS, PG 1347.

standard to deem land suitable for development or redevelopment within the twenty-year planning period.” The Department of Commerce provides guidance for land capacity calculations: “In formulating land capacity analyses, counties and cities should consider data on past development, as well as factors which may cause trends to change in the future.”³⁵

DRAFT Alternative Three Population Capacity and Growth Allocations to Jurisdictions within Regional Geographies 8/13/23

	2020 Census Pop (using Aug-26-2021 city bdys)	Adopted Initial Growth Targets		Alternative 3 Growth Targets		Alternative 3 Capacity	
		Initial 2044 Population	2020-2044 Population Change	Alt 3 2044 Population	2020-2044 Population Change	Alt 3 2044 Pop Capacity*	2020-2044 Additional Pop Capacity*
Metropolitan City	110,629	179,176	68,547	179,176	68,547	179,176	68,547
Everett City	110,629	179,176	68,547	179,176	68,547	179,176	68,547
UGA Total	693,830	992,120	298,290	1,010,609	316,779	1,024,663	330,833
Non-UGA (Rural/Resource)	134,127	144,190	10,063	148,076	13,949		
Total Snohomish County	827,957	1,135,309	308,352	1,158,684	330,727		

*For incorporated jurisdictions, the number reported for capacity equals the 2021 Buildable Lands Report 2035 capacity or the adopted Initial 2044 target, whichever is greater. Based on August 26, 2021 Incorporated boundaries. Some columns may not add due to rounding.

2021 Buildable Lands Report for Snohomish County

Table 1

6/23/2021 DRAFT Comparison of 2035 UGA Population Targets with Total Population Capacity Estimates
(all estimates, targets and capacity comparisons below are based on December 13, 2012 city boundaries)

Area	2019 Estimated Population	CPP 2035 Population Targets	2019-2035 Numeric Change	2035 Total Population Capacity	Additional 2019-2035 Pop Capacity	Pop Capacity Surplus vs. Shortfall ()
S.W. County UGA	506,018	582,035	76,017	655,424	149,406	73,389
Incorporated S.W.	283,231	363,413	80,182	373,479	90,248	10,066
Bothell City (part)	18,180	23,510	5,330	28,357	10,177	4,847
Brier City	6,611	6,972	361	7,074	463	102
Edmonds City	42,170	45,550	3,380	51,663	9,493	6,113
Everett City	111,794	164,812	53,018	151,063	39,269	(13,749)
Lynnwood City	39,596	54,404	14,808	58,145	18,549	3,741
Mill Creek City	20,590	20,196	(394)	21,716	1,126	1,520
Mtlake Terrace City	21,590	24,767	3,177	31,678	10,088	6,911
Mukilteo City	21,350	21,812	462	22,364	1,014	552
Woodway Town	1,350	1,389	39	1,419	69	30
Unincorporated S.W.	222,787	218,623	(4,164)	281,945	59,158	63,322
UGA Total	667,356	815,132	127,776	914,036	226,680	98,904
City Total	453,110	578,994	125,884	606,632	153,522	27,638
Unincorporated UGA Total	234,246	236,138	1,892	307,404	73,158	71,266

2021 Buildable Lands Report for Snohomish County

³⁵ WAC 365-196-310 (4)

DEIS data shows county residential “growth in the unincorporated UGAs outpaced growth in cities during the last decade (48 percent versus 42 percent of total population growth in the county from 2011 to 2020). As of 2020, the county’s unincorporated UGAs had reached and exceeded the 2035 population target, 15 years ahead of schedule. Much of this growth occurred in the Southwest UGA, most notably within the Mill Creek and Bothell MUGAs.”³⁶ This growth trend demonstrates that the SWUGA should be expanded to provide sufficient buildable land capacity for the 2020 – 2044 planning period.

County 2020 Growth Monitoring Report indicates the 2020 Unincorporated SWUGA population of 225,574 which exceeds the 2015 comp plan update 2035 population target of 218,623.³⁷

Snohomish County Tomorrow 2020 Growth Monitoring Report

Table P-3. Comparison of Annual April 1st Population Estimates with 2035 Population Targets for UGAs, Cities and the Rural/Resource Area (all population estimates and targets below are based on December 13, 2012 city boundaries)

Area	Population Estimates (using Dec 13, 2012 city boundaries)										2011-2020 Change		CIP 2035		
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	Amount	County Chg	Pop Target	2011-2035 Change	
Non-S.W. County UGA	161,288	162,634	164,373	165,716	165,506	171,819	174,966	178,999	181,338	185,922	24,634	21.7%	233,097	71,808	30.1%
Arlington UGA	19,493	18,412	18,781	18,551	19,328	19,165	19,242	19,899	20,296	21,183	2,694	2.3%	26,000	7,010	3.2%
Arlington City	17,966	17,938	18,270	18,364	19,484	19,614	19,634	19,254	19,734	20,594	2,628	2.3%	24,937	6,971	2.8%
Unincorporated	523	524	521	527	542	532	559	595	560	559	36	0.0%	1,060	541	0.2%
Darrington UGA	1,420	1,420	1,428	1,425	1,429	1,431	1,441	1,491	1,491	1,531	11	0.1%	2,161	741	0.3%
Darrington Town	1,345	1,345	1,350	1,350	1,350	1,350	1,400	1,400	1,410	1,420	75	0.1%	1,764	418	0.3%
Unincorporated	75	75	78	75	79	81	41	91	81	81	6	0.0%	357	322	0.1%
Gold Bar UGA	2,905	2,915	2,923	2,952	2,933	3,017	3,064	3,124	3,131	3,143	234	0.2%	3,319	411	0.2%
Gold Bar City	2,650	2,660	2,668	2,695	2,719	2,725	2,725	2,775	2,779	2,795	136	0.1%	2,406	346	0.1%
Unincorporated	949	955	953	957	988	923	925	949	951	945	56	0.1%	913	65	0.2%
Granite Falls UGA	3,417	3,527	3,532	3,535	3,541	3,548	3,539	3,772	4,050	4,553	1,063	0.8%	5,917	2,000	2.1%
Granite Falls City	3,270	3,380	3,385	3,390	3,390	3,395	3,465	3,618	3,900	4,425	1,028	0.5%	7,524	4,254	1.8%
Unincorporated	147	147	147	145	151	153	164	157	150	150	13	0.0%	893	746	3.3%
Index UGA (unincorporated)	180	180	180	180	180	188	175	175	175	175	(8)	0.0%	220	40	0.0%
Lake Stevens UGA	33,218	33,876	34,186	34,477	35,411	36,615	37,594	38,483	39,013	39,929	6,411	5.6%	45,390	13,162	5.5%
Lake Stevens City	23,210	23,510	23,563	23,770	23,900	23,900	23,740	23,670	23,657	23,578	5,968	4.7%	33,340	11,130	4.7%
Unincorporated	5,008	5,166	5,223	5,307	5,511	5,715	5,854	5,913	5,959	6,351	1,043	0.5%	7,049	2,032	0.5%
Mayville UGA	83,859	81,974	82,314	82,818	84,331	85,154	86,132	87,279	88,029	89,417	5,549	7.5%	87,793	26,925	14.3%
Mayville City	63,660	61,956	62,100	62,600	64,120	64,940	65,906	67,042	67,620	69,180	5,520	7.5%	65,688	26,925	11.3%
Unincorporated	209	214	214	218	221	224	223	236	239	237	29	0.0%	209	+	0.0%
Horro UGA	18,806	18,846	18,937	19,153	19,139	19,661	19,813	20,433	20,620	21,510	2,706	2.4%	24,784	5,948	2.8%
Horro City	17,351	17,390	17,510	17,650	17,620	18,120	18,380	18,660	18,820	19,300	2,448	2.2%	22,102	4,751	2.2%
Unincorporated	1,455	1,456	1,427	1,453	1,519	1,541	1,593	1,670	1,679	1,710	258	0.2%	2,682	1,197	0.5%
Snohomish UGA	10,559	10,576	10,575	10,643	10,786	11,045	11,445	11,559	11,620	11,897	1,128	1.0%	14,294	3,936	1.7%
Snohomish City	9,200	9,218	9,220	9,270	9,395	9,625	10,010	10,190	10,220	10,240	1,040	0.6%	12,139	2,839	1.2%
Unincorporated	1,359	1,358	1,355	1,373	1,421	1,424	1,438	1,446	1,450	1,447	88	0.1%	2,354	996	0.4%
Stanwood UGA	5,353	5,433	5,473	5,663	5,723	5,771	5,915	6,065	6,148	6,287	904	0.2%	11,095	4,732	3.0%
Stanwood City	5,200	5,300	5,340	5,520	5,580	5,630	5,780	5,930	6,013	6,148	958	0.4%	13,116	3,954	1.6%
Unincorporated	133	133	133	133	136	136	136	136	135	139	6	0.0%	969	626	0.4%
Sultan UGA	4,969	4,975	4,974	4,939	5,014	5,204	5,378	5,399	5,519	5,866	656	0.2%	8,363	3,368	1.2%
Sultan City	4,613	4,666	4,660	4,666	4,680	4,862	4,930	4,950	5,170	5,520	889	0.5%	7,343	2,650	1.1%
Unincorporated	214	215	214	221	234	244	245	249	249	246	21	0.0%	1,024	705	0.3%
S.W. County UGA	434,425	433,219	433,878	435,925	454,196	474,702	488,937	496,729	505,919	511,770	77,345	68.1%	692,025	147,610	62.0%
Incorporated S.W. (Barnes) City (part)	251,809	252,186	253,545	255,425	259,519	273,070	278,680	280,231	283,231	285,196	24,590	21.4%	353,413	101,907	43.9%
Barnes City	18,570	18,720	17,020	17,020	17,230	17,230	17,510	17,820	18,190	18,870	2,100	1.5%	22,510	6,940	2.9%
Barnes City	5,201	5,236	5,216	5,345	5,330	5,501	5,505	5,551	5,611	5,736	526	2.4%	6,972	771	0.3%
Barnes City	39,800	39,800	39,569	39,569	40,490	40,800	41,280	41,820	42,170	42,470	2,870	2.4%	45,550	5,790	2.4%
Barnes City	103,100	103,900	104,200	104,500	105,734	109,294	109,794	111,154	111,754	112,694	9,594	3.7%	154,512	51,712	25.9%
Littwood City	35,590	35,600	35,590	35,620	35,620	35,590	35,590	35,590	35,590	35,590	4,329	4.3%	54,404	16,544	11.3%
Mill Creek City	19,370	18,450	18,620	18,780	19,750	19,500	19,960	20,470	20,590	20,630	2,220	2.6%	20,196	1,628	0.3%
Mill Creek City	19,990	20,090	20,160	20,630	21,090	21,090	21,660	21,660	21,660	21,660	1,670	1.8%	34,787	4,777	2.0%
Mill Creek City	23,310	23,360	23,440	23,440	23,500	23,570	23,540	23,520	23,520	23,540	1,020	0.8%	21,812	1,900	0.5%
Woodley Town	1,959	1,910	1,900	1,910	1,935	1,935	1,940	1,940	1,950	1,950	55	0.0%	4,385	84	0.0%
Unincorporated S.W.	173,919	175,023	175,923	186,821	184,677	201,632	209,967	216,409	222,787	228,874	52,655	46.4%	218,523	48,704	13.2%
UGA Total	595,713	600,961	606,251	617,641	632,921	646,621	660,821	678,254	691,356	697,992	121,878	59.6%	815,130	219,419	51.1%
City Total	412,723	414,874	416,600	420,659	427,329	433,799	439,232	447,481	453,110	460,441	47,718	42.8%	578,994	166,271	65.9%
Unincorporated UGA Total	182,990	185,278	189,651	196,862	205,492	212,922	221,249	228,601	234,245	237,251	54,260	47.8%	236,136	53,148	23.3%
Non-UGA Total (Rural/Resource Area)	121,287	122,047	122,219	123,259	124,789	126,339	128,575	129,629	131,343	132,929	11,622	10.2%	148,126	16,838	7.9%
County Total	717,000	722,908	728,470	741,000	757,600	772,660	789,400	805,120	818,799	830,921	113,800	100.0%	963,257	235,257	40.3%

Population

³⁶ Draft EIS September 2023, pg 3-185

³⁷ 2020 Growth Monitoring Report, pg 17.

Docket XXI Motion 22-090 SWUGA expansion proposal evaluation included in the DEIS concludes that there is a buildable land capacity shortfall in the SWUGA³⁸ and the proposed docket is consistent with the GMA:

The No Action capacity estimates and 2044 growth targets indicate there is a population and employment capacity shortfall in the Southwest UGA. The increase in population capacity as a result of this motion is consistent with the GMA requirements in RCW 36.70A.110(2) by adding population capacity within the Southwest UGA to accommodate the projected growth for the succeeding 20-year period.

The docket proposal is consistent with b Condition 2 under CPP DP-2 “e” as the proposal is eligible for review by the county as part of the 8- year Comprehensive Plan update.

Docket XXI proposal SW14 was included in the DEIS Motion 22-090 docket evaluation. **The county states that a land capacity analysis had been conducted** for the SW14 docket proposal³⁹ yet, no land capacity analysis has been conducted for the Motion 22-090 proposal.

The county 2020 Growth Monitoring Report indicates a 2020 Unincorporated SWUGA population of 225,574.⁴⁰ The 2015 Land Capacity Analysis indicates an unincorporated SWUGA population capacity of 260,553,⁴¹ leaving the Unincorporated SWUGA an additional total population capacity of 34,979. The 2044 SWUGA additional population change is 88,775⁴², creating a SWUGA 2044 (53,796) population capacity deficit.

The county failed to include requirements and policies to *accommodate* housing affordable to all economic segments of the population of this county in the draft HE. The county failed to include a required housing needs figure calculated by the Washington State Department of Commerce in the draft HE. The county failed to include a required Land Capacity Analysis that identifies sufficient capacity of land for the 2020 – 2044 projected population growth in both the draft HE and the DEIS. The draft 2024 Housing Element proposed by Snohomish County should be returned to county planning for corrections and should not be recommended for County Council approval by the Planning Commission. The 2024 Comprehensive Plan Update Draft Environmental Impact Statement should be returned to county planning for corrections and should not be recommended for County Council approval by the Planning Commission.

Sincerely,

Frank R Strahm

Frank R Strahm

30 Years Designated Washington Real Estate Broker (license retired)
BABA - Finance
1712 Pacific Ave. Suite 105,
Everett, WA 98201

See county capacity deficit report attached**

³⁸ Draft EIS September 2023, pg 496, 497.

³⁹ Draft EIS September 2023, pg 497.

⁴⁰2020 Growth Monitoring Report, pg 17.

⁴¹ 2015 LCA, pg 7.

⁴² Draft EIS September 2023, pg 1347.

*Nate Sam Megan Stran
member of County Counsel*

Introduce yourself along with giving your address.

After living here for ~~4~~ years, I have observed the dangers children encounter **EVERY DAY**, just to get to school. I have also talked to 100's of newcomers who cannot find housing.

By including **ONLY** the north side of 156th St. SE, available land for building houses will be severely limited; therefore, builders will **NOT** likely fund any sidewalks that are needed for children's safety. In addition, Silver Firs Water District wants to put in a waterline, but that won't happen if there are only a couple of new houses built.

By including **BOTH** the south side and north side of 156th St. SE, the following objectives will be satisfied now **AND** into the future:

- ✓ Road widening: **YES**
- ✓ Sidewalks funded by the builders: **YES**
- ✓ New housing tax revenues: **YES**

By carefully making the right decisions now:

- ✓ The children will have safe and easy access to good schools for years to come.
- ✓ Bear Creek will be protected by enforcing regulation compliance with the builders.
- ✓ Housing will be available for people moving here from King County as well as from other states.

Thank you for your time and consideration!

June 14, 2024

To: Jared Mead, Nate Nehring, Sam Low, Megan Dunn, Strom Peterson

Subject: SW Urban Growth Area

I am writing to you with the support and endorsement of several neighbors who live on 156th Street SE, Bothell, WA and East of Sunset.

Please consider the following “higher growth” factors within Snohomish County in your decisions for accelerating new entries into the SW Urban Growth Area (UGA):

34 Climate change is causing more people to move to Washington State. In the Southwestern States, extreme water shortages are only going to get worse. When people are faced with severe climate problems in their living conditions, they will automatically be attracted to states with completely different weather patterns. The same is true for those people who live in states with extreme weather events (tornados, hurricanes, etc.) throughout the Midwest and East Coast states.

Washington State is one of just two states where illegal immigration is up. Again, more people than anticipated will be moving to Washington. In addition, Snohomish County again added the third most residents in Washington to its population, during the past year.

As more and more people move to Washington State, choosing their specific area of choice will be highly influenced by “cost-of-living.” Although Seattle has many high paying jobs, the housing costs are 35% higher than housing in Snohomish County! Most people will not be able to afford to live in Seattle, plus many will desire a yard for children and pets. Again, residents are moving from King to Snohomish County, where it is more affordable.

Additional options to consider:

- Builders who would provide housing on the proposed land addition to the SW UGA, could provide funds to widen the road to access the two schools at the east end of 156th Street.
- The builders would also comply with regulations dealing with Little Bear Creek, in the same manner as builders within the Silver Firs Community protected the creek.

Thank you for your time and consideration!

Best Regards,

② Jerry Morrier
4930 156th St. SE, Bothell, WA 98012
Cell: 206-679-1003

Hickey, Lisa

From: David Toyer <david@toyerstrategic.com>
Sent: Monday, August 19, 2024 2:33 PM
To: Contact Council
Subject: SW10 (Ordinance 24-027) LETTER OF SUPPORT
Attachments: SW10 SUPPORT LETTER - TSA 08_19_24 + Exhibits.pdf

Dear Council:

Attached please find a letter on behalf of our Client, CS Real Estate Development, in support of their proposed comp plan amendment and rezone, known as SW10. We respectfully urge your approval of Ordinance 24-027 redesignating and rezoning their property to Urban Center.

Please let me know if you have any questions.

Sincerely,

DAVID K. TOYER, PRESIDENT
[TOYER STRATEGIC ADVISORS, INC.](#)
3705 COLBY AVE, STE 1, EVERETT, WA 98201
425-344-1523
toyerstrategic.com

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August 19, 2024

County Council
Snohomish County
3000 Rockefeller Ave
Everett, WA 98201

ORDINANCE 24-027 – SUPPORT FOR SW-10

Dear Council:

Our firm has been retained by CS Real Estate Development, LLC., the applicant and proponent of SW10 that seeks to redesignate 14 acres in the Mill Creek UGA from Urban Industrial (UI) to Urban Center (UC) with a concurrent rezone from Light Industrial (LI) to Urban Center (UC). This proposal has received favorable recommendations from both the County's Planning Commission and the County Executive.

On behalf of CS Real Estate Development, LLC. (the "Applicant"), we respectfully request your approval of Ordinance 24-027.

[Response to Public Comments](#)

Starting in April 2024, comment letters were submitted by representatives at the law firm of VanNess Feldman (VNF) on behalf of Lease Crutcher Lewis (LCL), the owner of an adjacent 2-acre contractor yard that is zoned Light Industrial. Their primary concern with the SW10 redesignation and rezone is that any change in zoning will lead to use of the SW10 property by a use that will not be a compatible low intensity industrial use like theirs. This argument falls flat given the following:

1. The Applicant's 14-acre site was previously approved by the County for the construction of a preparatory school along with a dormitory, gymnasium, and other educational related buildings. A school is a permitted use under Urban Zones Categories Use Matrix at 30.22.100 SCC in the LI zone. The main school building has been under construction but plans for the remainder of the site could change depending on the outcome of UC redesignation and rezone. The proposed UC zoning will allow for future development of this site to accommodate a mix of residential and commercial uses that are consistent with adjacent residential areas, as well as nearby retail and light industrial development.
2. It is no guarantee that by retaining the existing LI zoning that a use more compatible to LCL will be developed. We call attention once again to Urban Zones Categories Use Matrix at 30.22.100 SCC, which establishes dozens of permitted and conditional uses allowed in the LI zone that LCL might expectedly consider incompatible. These include uses like agriculture, daycare centers, health and social service facilities level III, libraries, massage parlors, public parks, and swimming and wading pools.

Existing development patterns in the area show that other LI zoned properties proximate to LCL include a restaurant (*Burgermaster*), gymnasiums/sports facilities (*425 Fitness, Elevated Sportz Trampoline Park & Event Center, and D-BAT*), two churches, and professional/medical offices (*Stepping Stones Therapy*). This mix of commercial and industrial uses is common because the existing LI zone outright permits numerous retail and office uses, including banks, professional offices, hotels, neighborhood services, etc.

3. VNF fails to mention that LCL already abuts residentially zoned property. As Exhibit A to this letter, we are attaching a map showing the zoning and adjacent uses that surround the LCL site. This clearly shows that LCL abuts MR zoning west of its site, which area is anticipated to develop as multifamily and/or townhomes in the future.
4. It is recognized by the County that compatibility has little to do with zoning or the uses allowed in zones. This is made clear in the Urban Design Chapter of the proposed comprehensive plan which clearly states, "*Compatibility does not mean that a proposed use or building is the same as what already exists in the area.*" **Emphasis added.** Compatibility between sites can be managed by landscaping, setbacks, and other design requirements.
5. Current Land Use Policy 2.5, which is proposed to become Land Use Objective 2.D, acknowledges the County must provide flexibility to plan for a variety of land uses and that this can still provide for adequate protection of existing land uses. It reads:

Provide for reasonable flexibility in land use regulation and planned mixing of uses, where appropriate, while maintaining adequate protection for existing neighborhoods.

VNF's next argument is that the SW10 rezone is inconsistent with the County's comprehensive plan goals (GPPs), the countywide planning policies (CPPs), and the multicounty planning policies (MPPs). However, their analysis only looks at current comprehensive plan goals, objectives, and policies and not what is proposed in this comprehensive plan update. The difference between the former plan and the proposed plan is huge because each plan was built around a distinct set of land use assumptions made based on the next 20 years of forecasted employment and population growth. Thus, VNF's analysis of the prior policies in conjunction with the principal framework of the CPPs and MPPs that have already been updated to reflect planning for the next 20 years results in VNF misinterpreting parts of the broader vision, direction, and strategy that the county and region are attempting to achieve.

The following analyzes each of the goals, objectives, and policies VNF has referenced in opposition to SW10, serving to rebut VNF's assertions.

In an April 2024 letter VNF argues that the introductory language of the comprehensive plan's Economic Development Element supports their position that low intensity industrial uses are critical to the economic future of the county and that they are facing imminent extinction. They provide only a truncated version of that introduction which on its face may appear to support their position. However, that introduction is being updated, as is much of the comprehensive plan, to align with the Regional Growth Strategy (RGS) that envisions 65% of the region's population growth and 75% of the region's job growth being in designated centers¹ and transit emphasis corridors.

The section VNF quotes is being amended as follows:

~~((Although forecasts project significant future job growth in the service sector, traditional industrial and commercial development represent a substantial part of the economic future of Snohomish County.))~~ Forecasts by the Washington Employment Security Department project that in 2030 the top employing industries in Snohomish County by subcategory will be Health Services and Social Assistance, Aerospace Product and Parts Manufacturing, Accommodation and Food Services, and the top employing occupations by subcategory will be Sales and Related Occupations, Office and Administrative Support Occupations, and Food Preparation and Serving Related Occupations (Labor Market Info: Projections, July 2022). This type of development requires substantially greater infrastructure availability and faces substantial scrutiny by the community due to its real or potential impacts on the environment. Finding ways to provide for and encourage this development while maintaining the quality of the environment, minimizing the impact on infrastructure, and avoiding pricing industrial and commercial development out of this market, is an important challenge.

These amendments to the Economic Development Element introduction reflect the evolution of Snohomish County's employment base over the last ten years and where trends indicate the industrial sector and employment may be heading. They also recognize the challenge of balancing all land use needs (residential, commercial, and industrial) in the context of the RGS, which may require changes to the type and intensity of future development in certain areas. Ultimately, the RGS is pushing the County to recalibrate old assumptions for growth.

Going forward under the RGS, the County must intensify job creation and industrial development in designated employment and manufacturing industrial centers (Paine Field-Boeing Industrial Center and the Cascade Industrial Center) and intensify residential densities along core transit emphasis corridors and in designated growth centers. Map TE-6² which the County has prepared for the new comprehensive plan, identifies Bothell Everett Highway (Highway 527) as a core transit emphasis corridor. SW10's proposed redesignation and rezone from LI to UC will be located along the Bothell Everett Highway and just north of the Bothell Canyon Park Growth Center. Thus, the rezone and intensification of the use of SW10 is consistent with the RGS and its emphasis on transit corridors. The new UC designation will help the County be consistent with the RGS.

VNF further argues that Economic Development (ED) Policy 3.D.5 requires the County prioritize redevelopment of the existing industrial area in SW10 for industrial development. However, Policy 3.D.5 is being amended in the new comprehensive plan and VNF fails to reconcile Policy 3.D.5 with the controlling Objective at ED 3.D. Both the existing objective (which is not proposed to change) and the amended Policy 3.D.5 policy are shown here:

Objective ED 3.D Provide opportunities for job creation through promoting the expansion of existing and future potential port and airport industries and industrial areas.

¹ This includes urban centers (growth centers), employment centers, and manufacturing industrial centers.

² Exhibit B

Policy 3.D.5 *Snohomish County shall prioritize the redevelopment of existing industrial areas and underutilized urban lands and investigate potential incentives that may make redevelopment a greater financial opportunity.*

As can be seen, the context missing from VNF's argument is that Policy 3.D.5 primarily relates to port and airport industries, as well as industrial areas. Ultimately, existing industrial sites like LCL's 2-acre contractor yard are the type of underutilized urban lands the policy seeks to prioritize for redevelopment, not the SW10 property.

VNF next attempts to argue that Land Use (LU) Objective 2.C supports keeping the SW10 site zoned LI, selecting objectives and policies from the comprehensive plan without examining their broader intent. In this case, LU Objective 2.C must be viewed in conjunction with Policies LU 2.C.1 through 2.C.5. And these policies are clear that the intent of the County is to expand, revitalize, redevelop, and intensify existing areas to the extent that such intensification and revitalization is specifically focused on areas "located within designated centers and along transit emphasis corridors"³ and that "new commercial development shall be accommodated as mixed use in urban centers, and/or urban village or adjacent to transit stations or within transit emphasis corridors."⁴ *Emphasis added.* The SW10 site is located on a core transit emphasis corridor and within ¼ mile walking distance of multiple bus stops, including stops for the Swift Green Line bus rapid transit line.⁵ Thus, SW10 is a prime location for intensifying residential and commercial development by applying UC zoning. It should be noted that only LU Policy 2.C.5 references industrial areas, but it strictly pertains to the creation of new industrial areas.

VNF then tries again to raise a compatibility question by citing ED Policy 3.A.6 and claiming this rezone will marginalize existing light industrial businesses in the UGA because of increasing development pressures from surrounding residential neighborhoods. Those pressures exist regardless of SW10 as the MR zoning west of LCL will eventually realize apartments and/or townhomes development. The SW10 rezone to UC will not change the underlying zoning of LCL's property or that of other light industrial businesses in the area. VNF's repeated compatibility argument fails to bring into view that the light industrial area it falls within is surrounded by high density residential development and the County has historically placed an emphasis of putting residential growth along this high capacity transit corridor.

Next VNF suggests that CPP Policy DP-42 requires the County conserve the SW10 industrial land for future industries to protect LCL from incompatible uses. Unfortunately, CPP D-42 uses the word "should" as opposed to "shall" making conservation a recommendation, not a requirement. Further, VNF cites CPP ED-9 as requiring the county preserve designated industrial lands. As in DP-42, ED-9 also contains "should" not "shall" limiting it to a recommendation. Moreover, we find it interesting that VNF singles out industrial land for preservation when the actual policy more broadly covers a range of uses from industrial to commercial to resource.

In its April 2024 letter, as well as in a supplemental letter dated May 20, 2024, VNF acknowledges that SW10 is needed to address a population shortfall in the Mill Creek UGA, but contends that the County should alternatively rezone existing lower density residential zones in lieu of rezoning the SW10 from LI to UC.

In support of its approach, VNF cites both comprehensive plan LU Objective 2.A and LU Policy 2.B.2. However, as we add emphasize to these below, this objective and policy very explicitly apply to intensifying residential densities in designated urban centers and along transit corridors, which is what the SW10 rezone does. Therefore, in citing this objective and policy VNF ends up emphasizing why the County cannot consider VNF's alternative approach.

Objective LU 2.A *Increase residential densities within UGAs by concentrating and intensifying development in appropriate locations, particularly within designated centers and along identified transit emphasis corridors.*

LU Policy 2.B.2 *The county shall encourage, and may require, higher minimum densities within designated urban centers, urban villages, and along connecting transit emphasis corridors to support planned transit service.*

VNF alternatives appear in tables as an attachment to their May 2024 letter, where they identify parcels in the Mill Creek UGA that they contend can be rezoned from lower density residential zoning to higher density residential zoning to achieve the same result as the SW10 proposal.

However, it only takes a simple land use analysis of these sites to demonstrate that the VNF identified parcels are not

³ LU Policy 2.C.1

⁴ LU Policy 2.C.2

⁵ Stop 3049, 180th St SE S/B Stop

developable due to known critical areas, powerlines, and other encumbrances. This highlights why these properties were not used for capacity in the County's land use capacity assumptions and why SW10 was recommended by the Executive. To illustrate how VNF's rezone alternatives are not possible, our Exhibit C (attached) contains notes for each general location on their tables, as well as corresponding maps (with site specific notes) and, where easily available, copies of the recorded critical areas site plans that show future development prohibited in these areas.

We conclude that none of the VNF locations are likely to provide for any substantive population capacity from development or redevelopment due to a combination of sites having existing development, inventoried critical areas, recorded critical areas site plans (CASPs), power line easements, approved subdivisions awaiting construction, and other encumbrances and challenges.

Therefore, the VNF alternative locations cannot address the population capacity shortfall in the Mill Creek UGA that is being addressed in part by SW10. To go along VNF's alternatives, the County would be risking being out of compliance with RCW 36.70A.215(3)(a) which is clear that ". . . zoned capacity of land alone is not a sufficient standard to deem land suitable for development or redevelopment within the twenty-year planning period." **Emphasis Added.**

Finally, VNF cites language from the comprehensive plan's objectives and policies that relate to Manufacturing Industrial Centers (MICs) as a basis for the county needing to conserve other industrial areas. Unfortunately, they only acknowledge one MIC (Paine Field-Boeing) and fail to mention the Cascade Industrial Center in Arlington/Marysville, which is known for serving a considerable number of small to medium size light industrial businesses (particularly to the east and northeast of the municipal airport). VNF further fails to establish how the County is not providing for enough industrial sites for small and medium size light industrial businesses countywide, though there are many light industrial areas that have significant development and redevelopment potential. These include industrial areas in Maltby (also a candidate site for a countywide industrial center), Monroe (near the Fryelands), Sultan (along East Main and off High Bank Rd), Lake Stevens (Machias Rd), Granite Falls (NE corner of the UGA), and more.

Closing

The proposed SW10 redesignation and rezone is fully supported by the Planning Commission and County Executive, is consistent with the RGS, and it addresses a population capacity shortfall in the Mill Creek UGA. SW10 represents the County's best efforts under RCW 36.70A.3201 to "*balance priorities and options for action in full consideration of local circumstances. . .*" which places balancing act places a heavy burden on the County to harmonize competing planning goals within GMA, the frameworks of both the MPPs and CPPs, and the complexity of the County's own comprehensive plan.

Again, we respectfully request the Council **approve Ordinance 24-02** to redesignate and rezone the SW10 site to Urban Center.

Should you have any questions, or require clarifications or further information, please do not hesitate to contact me at 425-322-5226 or david@toyerstrategic.com.

Sincerely,

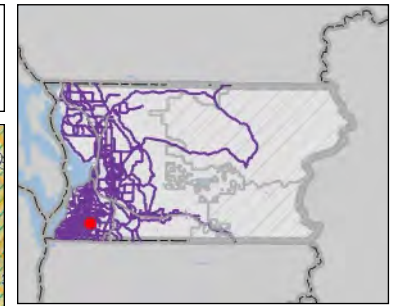
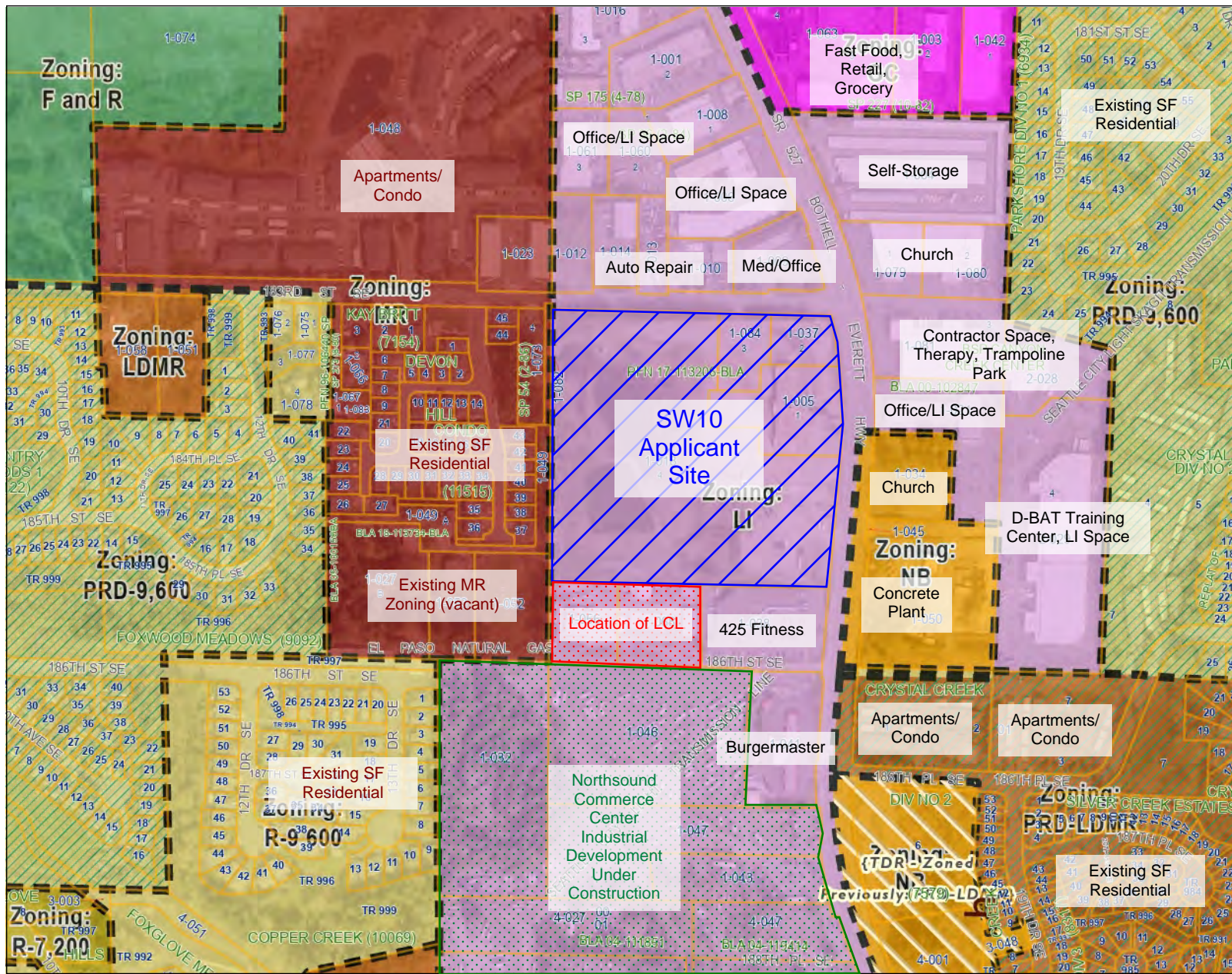


David Toyer
President

- Exhibit A Adjacent Uses & Zoning Map
- Exhibit B Map TE-6, Transit Emphasis Corridors
- Exhibit C Analysis & Mapping of VNF's Alternatives

EXHIBIT

A



Legend

- Snohomish County Tax Parcels
- Transfer of Development Rights (TDR) Receiving Area
- Zoning Labels (Dynamic)
- Zoning Line
- Commercial and Local Forest Notice (500 ft.)
- Mineral Resource Overlay Notice (2,000 ft.)
- Agriculture Notice (1,300 ft.)
- Airport Notice 2,500 ft.
- Hazard Areas: Mines (w/ 200 ft.)
- Hazard Areas: Seismic Active Faults (w/ 200 ft.)
- Hazard Areas: Tsunami (w/ 200 ft.)
- Hazard Areas: Volcanic Lahar (w/ 200 ft.)
- Density Fringe
- Mineral Resource Overlay
- Minimum Lot Size 10 Acres
- Agriculture Notice Area
- Rural/Urban Transition Area (R/UTA)
- Airport
- Airport Compatibility Areas (SCC 30.32E)
- Commercial Forest Transition Area
- Commercial Forest (CF, LF)
- Zoning Types (Colorized)**
- A-10 (Agriculture-10 Acre)
- BP (Business Park)
- CB (Community Business)
- PRD-CB

1:4,929



821.5 0 410.73 821.5 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

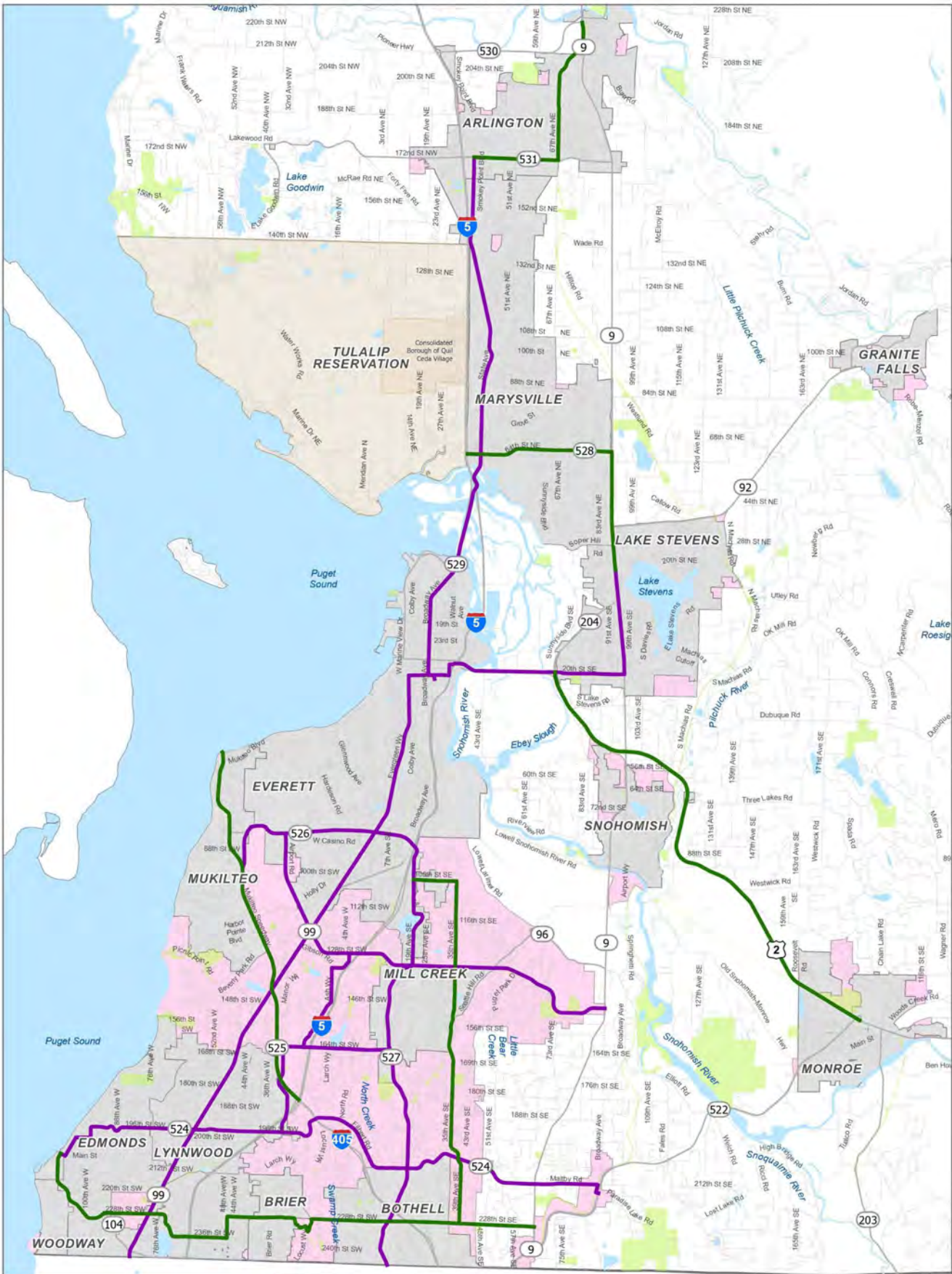
All maps, data, and information set forth herein ("Data"), are for illustrative purposes only and are not to be considered an official citation to, or representation of, the Snohomish County Code. Amendments and updates to the Data, together with other applicable County Code provisions, may apply which are not depicted herein. Snohomish County makes no representation or warranty concerning the content, accuracy, currency, completeness or quality of the Data contained herein and expressly disclaims any warranty of merchantability or fitness for any particular purpose. All persons accessing or otherwise using this Data assume all responsibility for use thereof and agree to hold Snohomish County harmless from and against any damages, loss, claim or liability arising out of any error, defect or omission contained within said Data. Washington State Law, Ch. 42.56 RCW, prohibits state and local agencies from providing access to lists of individuals intended for use for commercial purposes and, thus, no commercial use may be made of any Data comprising lists of individuals contained herein.

Notes

This map was automatically generated using Geocortex Essentials.

EXHIBIT

B



**SNOHOMISH COUNTY 2024
GMA COMPREHENSIVE PLAN
TRANSPORTATION ELEMENT**

Map TE-6 Transit Emphasis Corridors

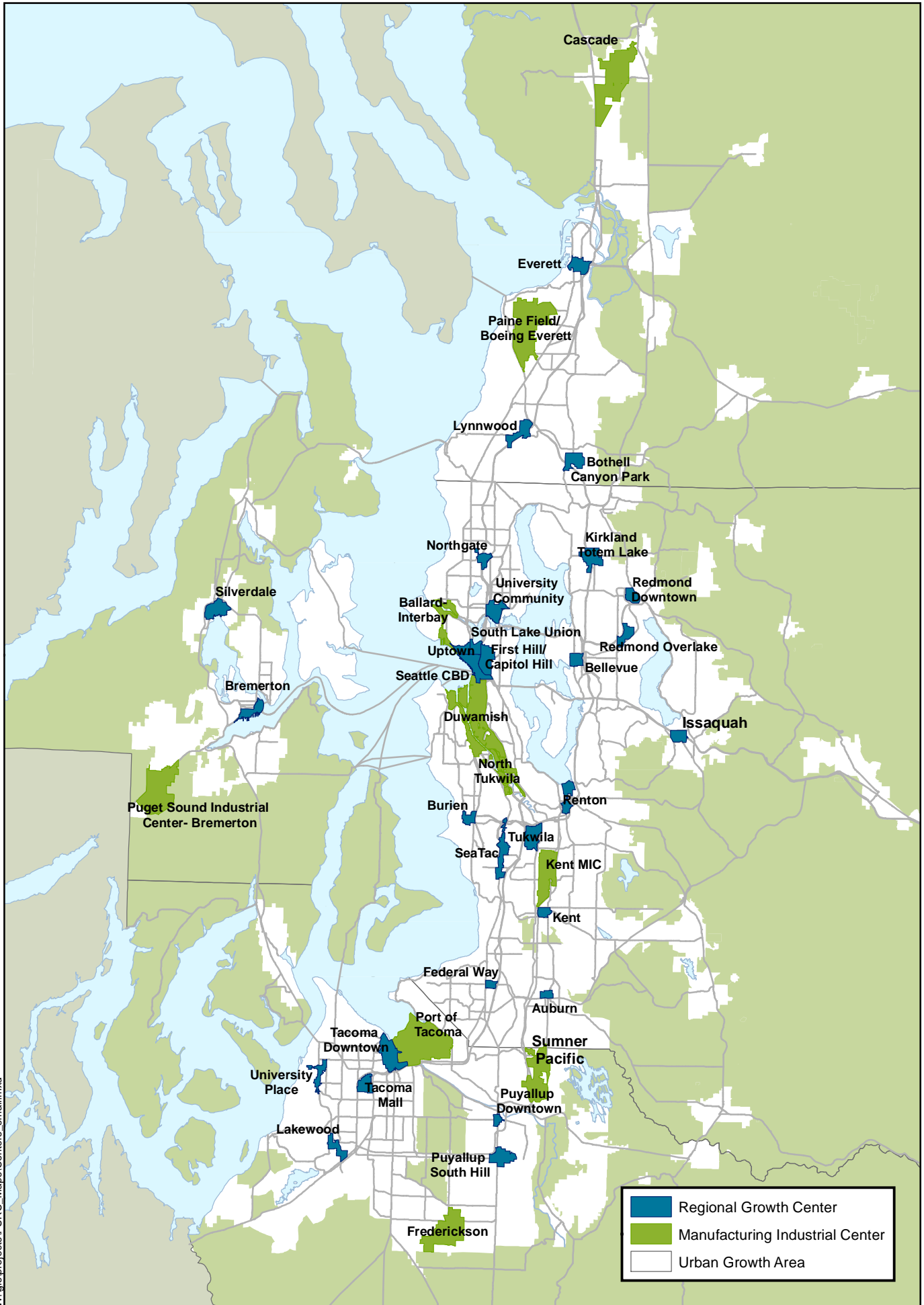
- Core Corridor —
- Community-Based Corridor —
- Urban Growth Areas
- Federal Indian Reservation
- County Parks
- Cities



Snohomish County Data and Map Disclaimer

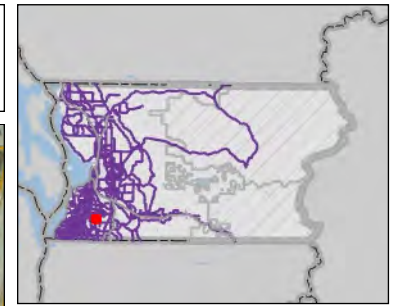
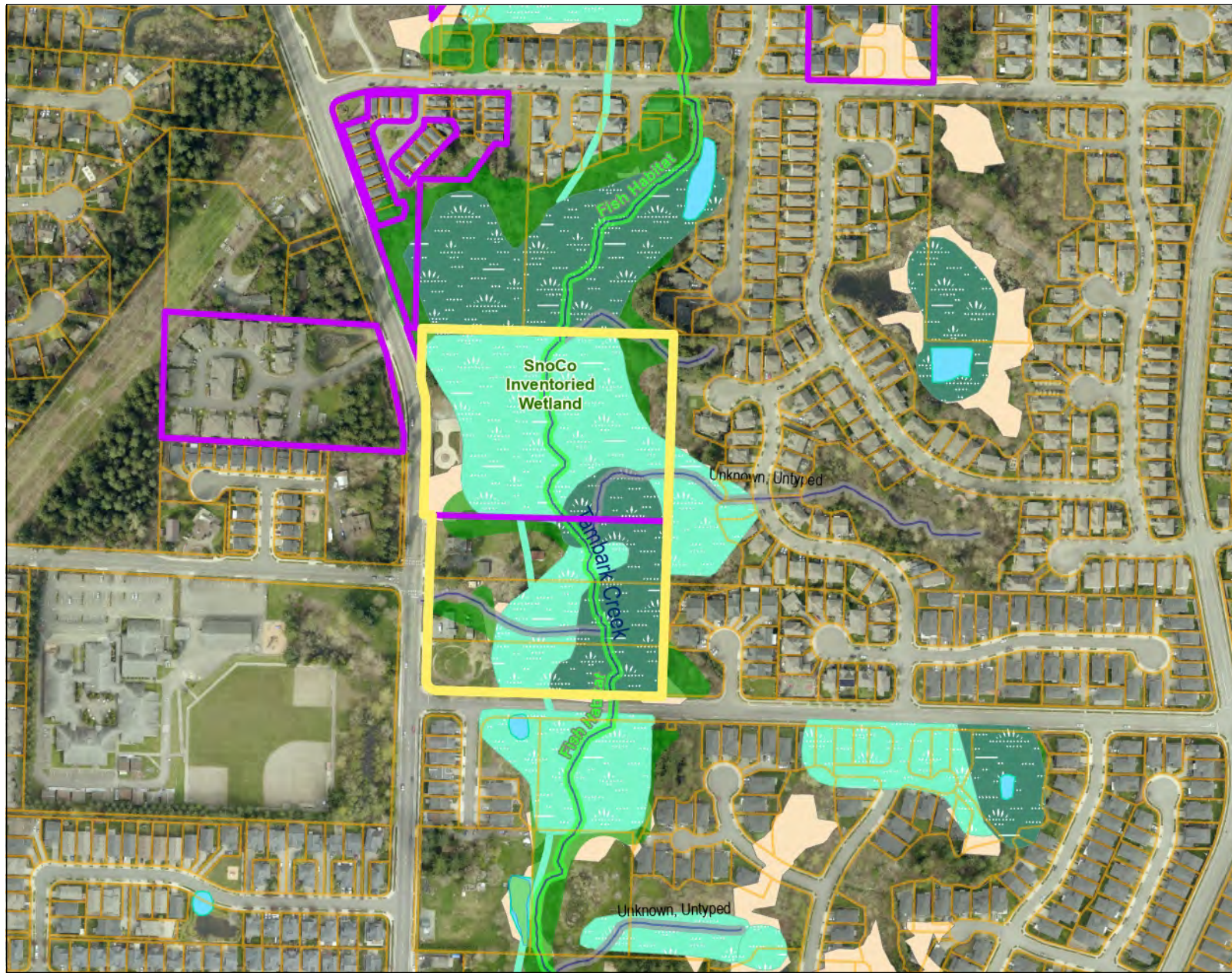
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Regional Growth Centers and Manufacturing/Industrial Centers



EXHIBIT

C



Legend

- Critical Area Site Plans
- Snohomish County Tax Parcels
- All Fish Distributions
- Snohomish County Streams**
 - Shorelines of Statewide Significance
 - Shorelines of the State
 - Fish Habitat
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 - Estuarine and Marine Wetland
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 - Freshwater Forested/Shrub Wetland
 - Freshwater Pond
 - Lake
 - Other
 - Riverine
- Snohomish County Wetland Inventory**
- Tulalip Wetlands**
 - Critical
 - High
 - Moderate
- Remote Sensing-based Wetland Model

1:4,679



779.8 0 389.89 779.8 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

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Notes

This map was automatically generated using Geocortex Essentials.

Return Address: Joe Salameh
20033 27TH AVE SE BOTHELL, WA 98012



201809270151 2 PGS
09/27/2018 11:01am \$100.00
SNOHOMISH COUNTY, WASHINGTON

CRITICAL AREAS SITE PLAN

Project #: 18 118808 LDA	
Applicant: Joe Salameh	
Site Address: 16617 35TH AVE SE BOTHELL, WA 98012	
Tax Acct. #: 270509-002-019-00	
REFERENCE NUMBER(S) OF RELATED DOCUMENTS:	1 of <u>2</u>
GRANTOR(S) (OWNERS OF PROPERTY):	
<u>Salameh</u>	<u>Joe</u>
LAST NAME	FIRST NAME MI
GRANTEE(S): SAME AS ABOVE	
Legal Description:	
SEC 09 TWP 27 RGE 05RT-23) SW1/4 NW1/4 NW1/4 LESS S 165FT THOF	
<input type="checkbox"/>	Additional legal description is on page _____ of document

In consideration of Snohomish County Code requirements, except as otherwise provided herein, the CAPA (Critical Area Protection Area) shall be left permanently undisturbed in a substantially natural state. No clearing, grading, filling, building construction, or placement, or road construction of any kind shall occur within said CAPA, except the allowed activities set forth in Snohomish County Code (30.62A.010(2), 30.62A.510, 30.62A.530) when approved by the County.

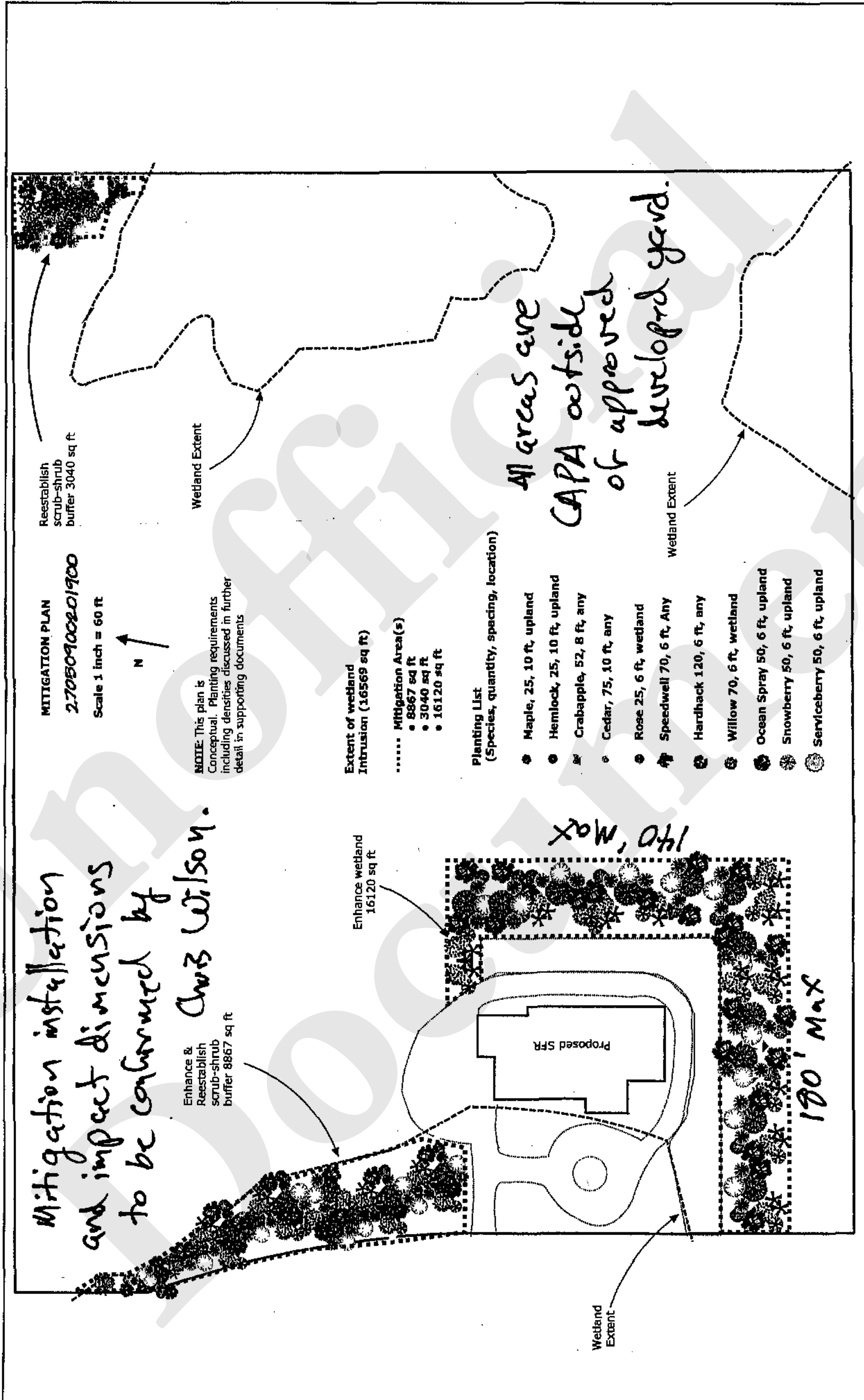
Representations on this site plan may be approximations only and should not be used for purposes other than for determining general locations of critical areas. Development activities beyond the scope of this plan may require additional studies and approvals.

The lot owner(s) shall be responsible for operating, maintaining, repairing and restoring the condition of the CAPA if any unauthorized disturbance occurs.

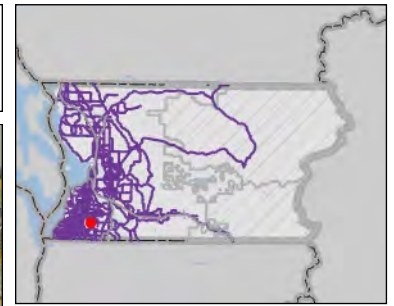
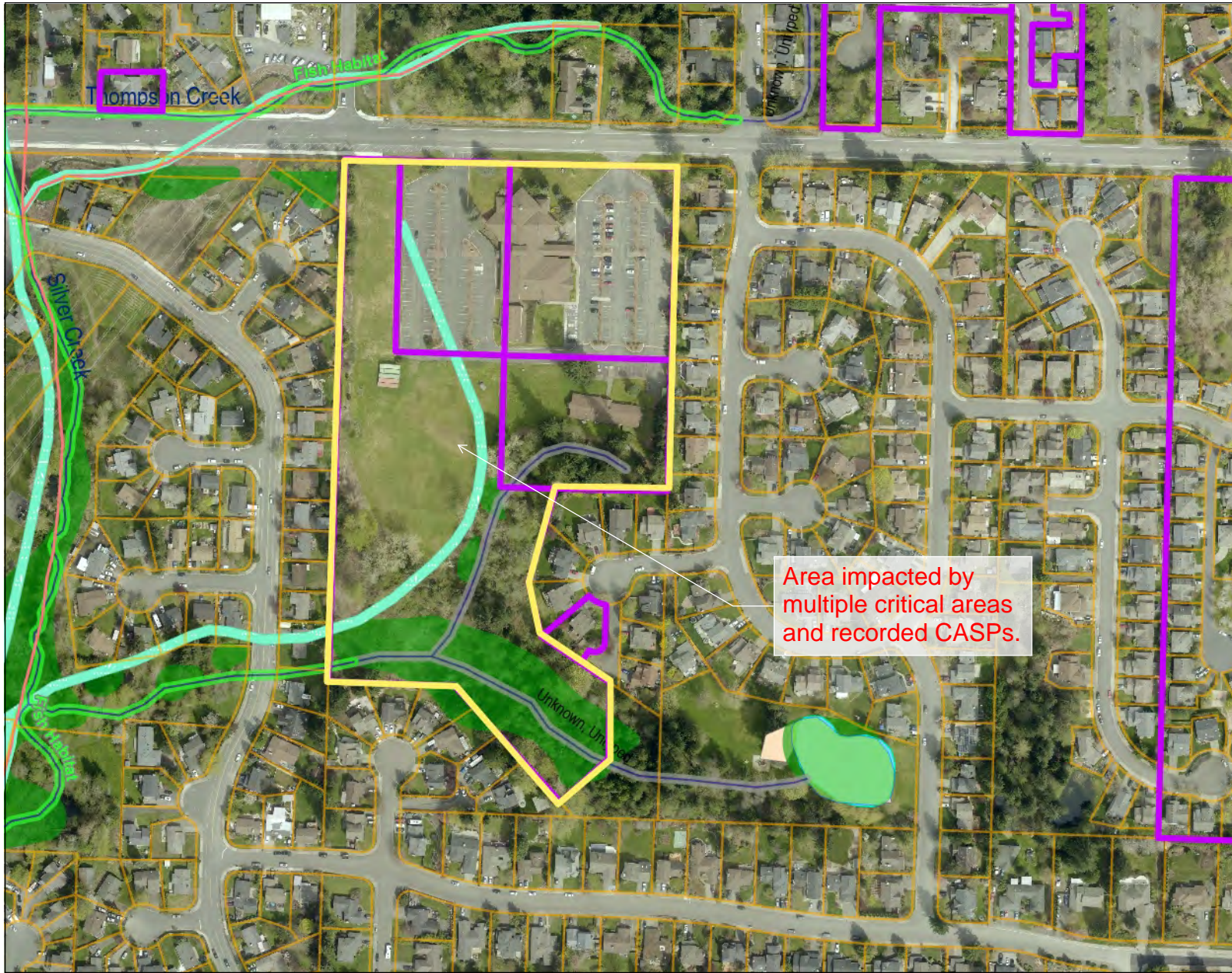
APPLICANT: Joe Salameh
 PROJECT #: 18 118808 LDA
 TAX ACCT#: 270509-002-019-00

SITE PLAN:

2 OF 2



APPROVED SNO CO PDS _____ DATE 9-25-18 OWNER(S) J. Salameh DATE 9/27/2018



Legend

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- Snohomish County Tax Parcels
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 - Riverine
- Snohomish County Wetland Inventory**
- Tulalip Wetlands**
 - Critical
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 - Moderate
- Remote Sensing-based Wetland Model

1: 3,505



584.2 0 292.08 584.2 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

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Notes

This map was automatically generated using Geocortex Essentials.

RECORDED BY SNOHOMISH COUNTY: BOB TERWILLIGER, AUDITOR

9703260228

10-

RECORDED

97 MAR 26 PM 12:45

AUDITOR
SNOHOMISH COUNTY, WASH.
DEPUTY _____

CRITICAL AREAS SITE PLAN	
Project # <u>95-109313</u>	Applicant <u>Seton Parish</u>
Mailing address <u>P.O. Box 12429, Mill Creek, WA 98082</u>	
Site address <u>2316 - 180th St. SE, Bothell, WA</u>	
Tax Acct. # <u>172705-2-020-0007</u>	
Critical Area Sq. Ft. <u>124,560</u>	Buffer Sq. Ft. <u>54,753</u>

NATIVE GROWTH PROTECTION AREA is to be left permanently undisturbed in a substantially natural state. No clearing, grading, filling, building construction or placement, or road construction of any kind shall occur, except removal of hazardous trees. The activities as set forth in SCC 32.10.110(27) a, c, d, are allowed when approved by the County.

Representations on this site plan may be approximations only and should not be used for purposes other than for determining general locations of critical areas. Development activities beyond the scope of this plan may require additional studies and approvals.

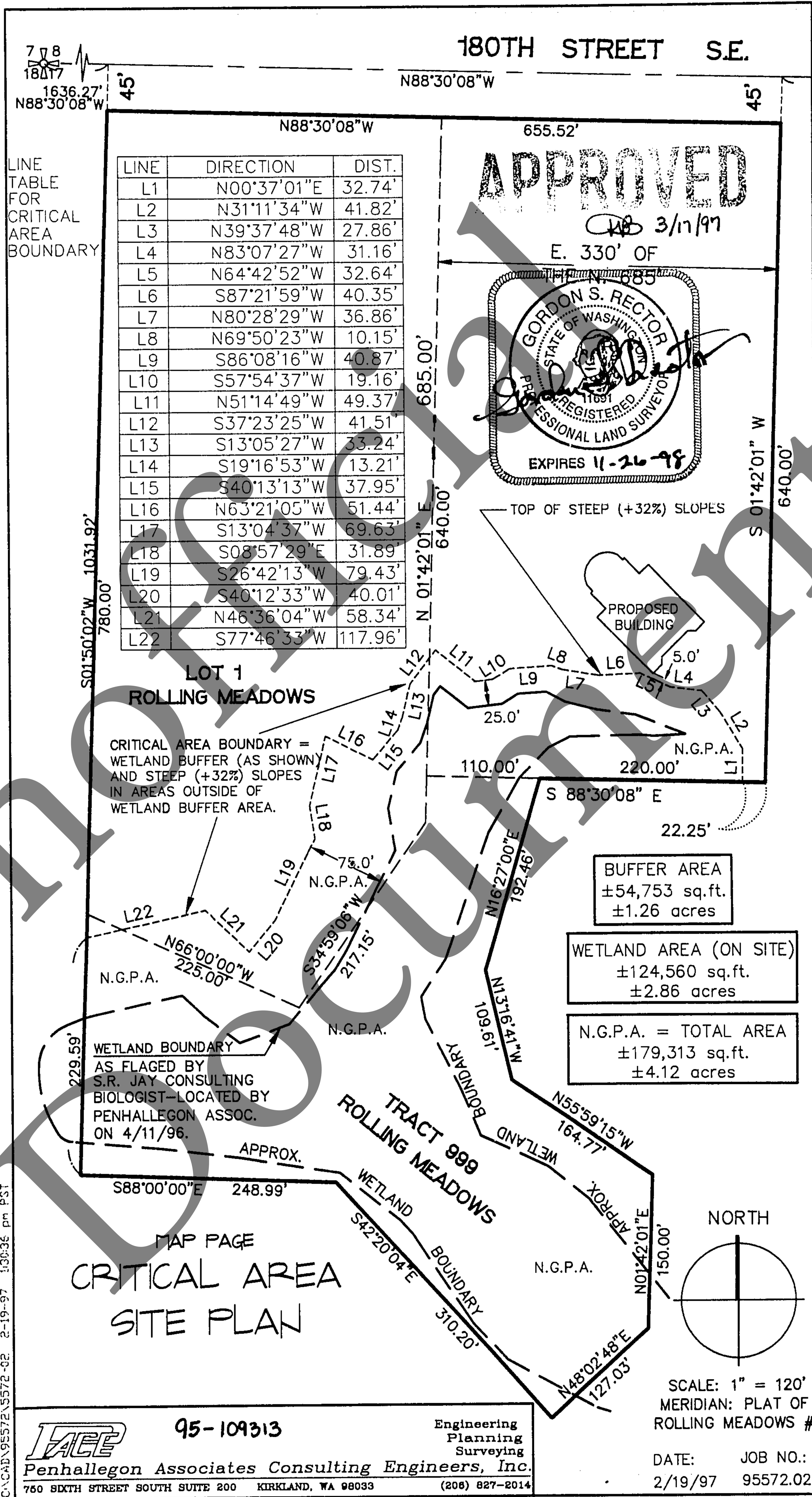
Legal Description is attached - See Exhibit 1

See Page Two (2) for Site Plan

APPROVED

DB 3/1/97

RECORDED BY SNOHOMISH COUNTY: BOB TERWILLIGER, AUDITOR



C:\CAD\95572\5572-02 2-19-97 10:36 pm PST

9703260222

VOL. 3286 PAGE 0578

RECORDED BY SNOHOMISH COUNTY: BOB TERWILLIGER, AUDITOR

95572.00
February 25, 1997

EXHIBIT 1

LEGAL DESCRIPTION: **95 109313**

Lot 1 and Tract 999, Rolling Meadows Division No. 1, as recorded in Volume 46 of Plats, page 216 and 217, records of Snohomish County, Washington; and

The north 685.00 feet of the east 330.00 feet of the west one-half of the northeast quarter of the northwest quarter of Section 17, Township 27 North, Range 5 East, W.M.;
EXCEPT the north 45.00 feet thereof;
ALSO known as Lot 2 of unrecorded Short Plat

Situate in the County of Snohomish, State of Washington.

SUBJECT TO easements and the terms and conditions thereof as recorded under Auditor's File No. 2113125 and 7807200323 and Agreement and the Terms and Conditions thereof as recorded under Auditor's File No. 2347625; Terms and Conditions of unrecorded Short Plat.

8703260228

VOL. 3286 PAGE 0579



Legend

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- Snohomish County Tax Parcels
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- Snohomish County Streams**
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 - Freshwater Pond
 - Lake
 - Other
 - Riverine
- Snohomish County Wetland Inventory
- Tulalip Wetlands**
 - Critical
 - High
 - Moderate
- Remote Sensing-based Wetland Model

1: 1,286



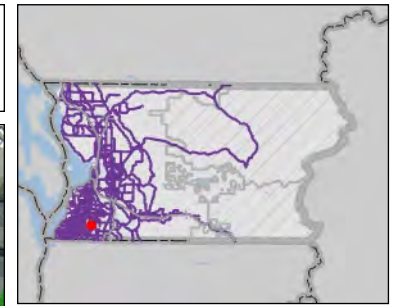
214.4 0 107.19 214.4 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

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Notes

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Legend

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 - Other
 - Riverine
- Snohomish County Wetland Inventory**
- Tulalip Wetlands**
 - Critical
 - High
 - Moderate
- Remote Sensing-based Wetland Model

1: 2,302



383.6 0 191.80 383.6 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

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Notes

This map was automatically generated using Geocortex Essentials.

RETURN ADDRESS:
CREEKSIDE CROSSING, L.L.C.
4949 SW MEADOWS ROAD, SUITE 400
LAKE OSWEGO, OR. 97035

200605080412 4 PGS
05/08/2006 11:49am \$35.00
SNOHOMISH COUNTY, WASHINGTON

CRITICAL AREA SITE PLAN

PROJECT #: 04-1105516LU	APPLICANT: CREEKSIDE CROSSING, L.L.C.
SITE ADDRESS: 190TH BOTHELL-EVERTT HWY.	
TAX ACCT #: 27051700300900	
CRITICAL AREA SQ. FT.: 66,145	BUFFER SQ. FT.:
REFERENCE NUMBER(S) OF RELATED DOCUMENTS	1 OF 4
GRANTOR(S) CREEKSIDE CROSSING, L.L.C. <u>Mark Hanson</u>	
GRANTEE(S) SAME AS ABOVE	
LEGAL DESCRIPTION: PORTIONS OF PARCEL 2, SNOHOMISH COUNTY BOUNDARY LINE ADJUSTMENT NUMBER 05-124249, RECORDED UNDER AUDITOR'S FILE NUMBER 200509270344, RECORDS OF SNOHOMISH COUNTY, WASHINGTON, BEING PORTIONS OF THE NORTHWEST QUARTER OF THE SOUTHWEST QUARTER OF SECTION 17, TOWNSHIP 27 NORTH, RANGE 5 EAST, WILLAMETTE MERIDIAN, SEE SHEET 2 FOR COMPLETE LEGAL DESCRIPTION.	
<input checked="" type="checkbox"/> ADDITIONAL LEGAL DESCRIPTION IS ON PAGE 2 OF DOCUMENT	

NATIVE GROWTH PROTECTION AREA is to be left permanently undisturbed in a substantially natural state. No clearing, grading, filling, building construction, or placement, or road construction of any kind shall occur, except removal of hazardous trees. The activities as set forth in SCC 30.91N.010 (1), (3), and (4), are allow when approved by the county. Representations on this site plan may be approximate only and should not be used for purposes other than for determining general locations of critical areas. Development activities beyond the scope of this plan may require additional studies and approvals.

APPLICANT: CREEKSIDE CROSSING, L.L.C.
PROJECT #: 04-1105516LU
TAX ACCT #: 27051700300900

LEGAL DESCRIPTION:

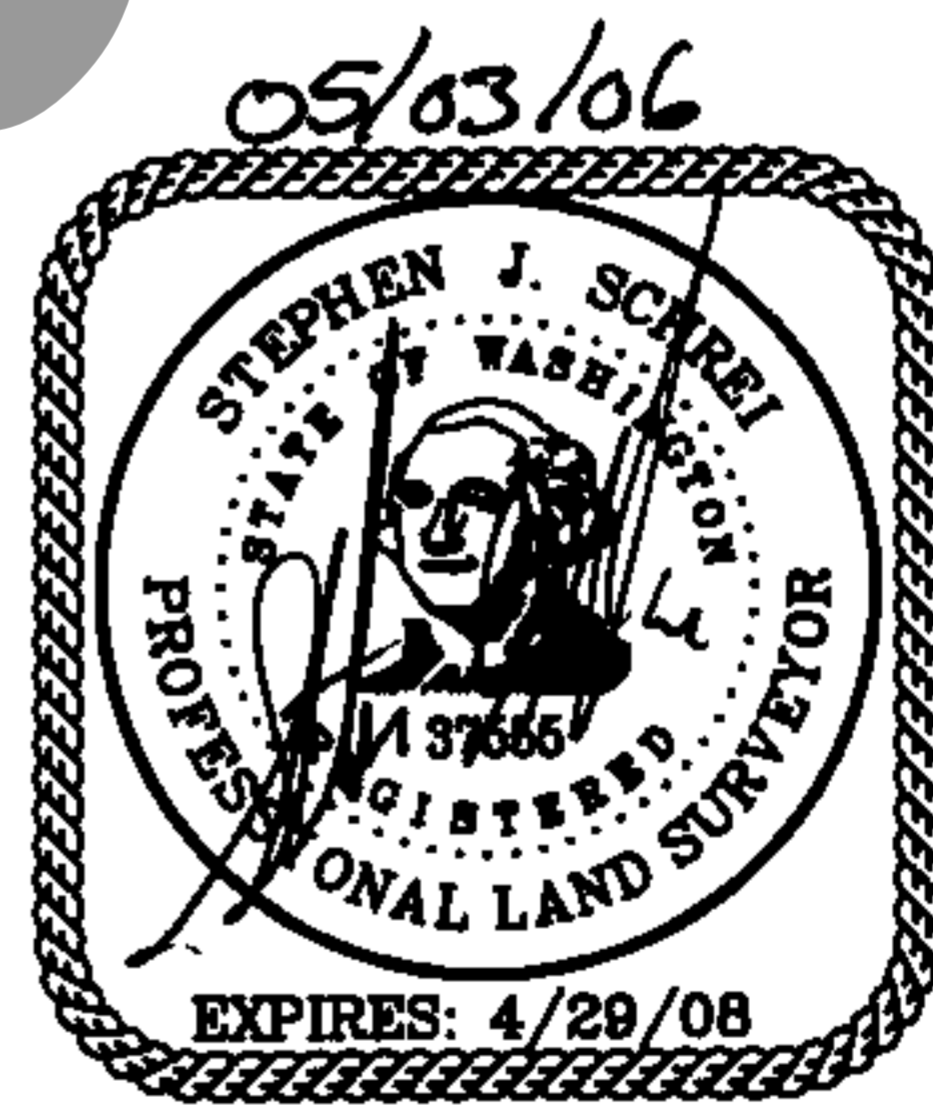
2 OF 4

NATIVE GROWTH PROTECTION AREA:

THAT PORTION OF PARCEL 2, SNOHOMISH COUNTY BOUNDARY LINE ADJUSTMENT NUMBER 05-124249, RECORDED UNDER AUDITOR'S FILE NUMBER 200509270344, RECORDS OF SNOHOMISH COUNTY, WASHINGTON, BEING PORTIONS OF THE NORTHWEST QUARTER OF THE SOUTHWEST QUARTER OF SECTION 17, TOWNSHIP 27 NORTH, RANGE 5 EAST, WILLAMETTE MERIDIAN, DESCRIBED AS FOLLOWS:


BEGINNING AT THE NORTHEAST CORNER OF SAID PARCEL 2; THENCE S01°28'17"W, ALONG THE EAST LINE OF SAID PARCEL 2, A DISTANCE OF 150.02 FEET TO THE SOUTHEAST CORNER OF SAID PARCEL AND THE NORTH RIGHT-OF-WAY MARGIN OF 192ND STREET S.E.; THENCE N87°25'03"W, ALONG THE SOUTH LINE OF SAID PARCEL AND SAID NORTH MARGIN, 79.46 FEET TO A POINT OF TANGENCY WITH A 20.00-FOOT RADIUS CURVE TO THE RIGHT; THENCE NORTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 39°26'37", A DISTANCE OF 13.77 FEET; THENCE N10°47'35"E 48.19 FEET; THENCE N01°19'03"W 18.75 FEET; THENCE N03°40'42"E 30.21 FEET; THENCE N15°29'39"E 25.65 FEET; THENCE N03°01'03"W 23.94 FEET TO POINT A AND THE NORTH LINE OF SAID PARCEL 2; THENCE S87°25'03"E, ALONG SAID NORTH LINE, 79.68 FEET TO THE POINT OF BEGINNING.

AND COMMENCING AT SAID POINT A; THENCE N87°25'03"W, ALONG THE NORTH LINE OF SAID PARCEL 2, A DISTANCE OF 79.34 FEET TO THE POINT OF BEGINNING OF THE HEREIN DESCRIBED TRACT; THENCE CONTINUING N87°25'03"W, ALONG SAID NORTH LINE, 369.83 FEET; THENCE S01°12'05"W 128.03 FEET TO THE NORTH RIGHT-OF-WAY MARGIN OF SAID 192ND STREET S.E.; THENCE THE FOLLOWING SEVEN COURSES AND DISTANCES ALONG SAID MARGIN; THENCE S87°25'03"E 35.44 FEET; THENCE S02°34'57"W 4.00 FEET; THENCE S87°25'03"E 100.00 FEET; THENCE S02°34'57"W 13.00 FEET; THENCE S87°25'03"E 100.00 FEET; THENCE S02°34'57"W 5.00 FEET; THENCE S87°25'03"E 122.77 FEET; TO A POINT OF TANGENCY WITH A 20.00-FOOT RADIUS CURVE TO THE LEFT; THENCE NORTHEASTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 90°00'00", A DISTANCE OF 31.42 FEET TO A POINT OF TANGENCY; THENCE N02°34'57"E 60.79 FEET TO A POINT OF TANGENCY WITH A 214.50-FOOT RADIUS CURVE TO THE LEFT; THENCE NORTHEASTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 18°49'16", A DISTANCE OF 70.46 FEET TO THE POINT OF BEGINNING.




APPROVED BY PDS

5/8/06
DATE

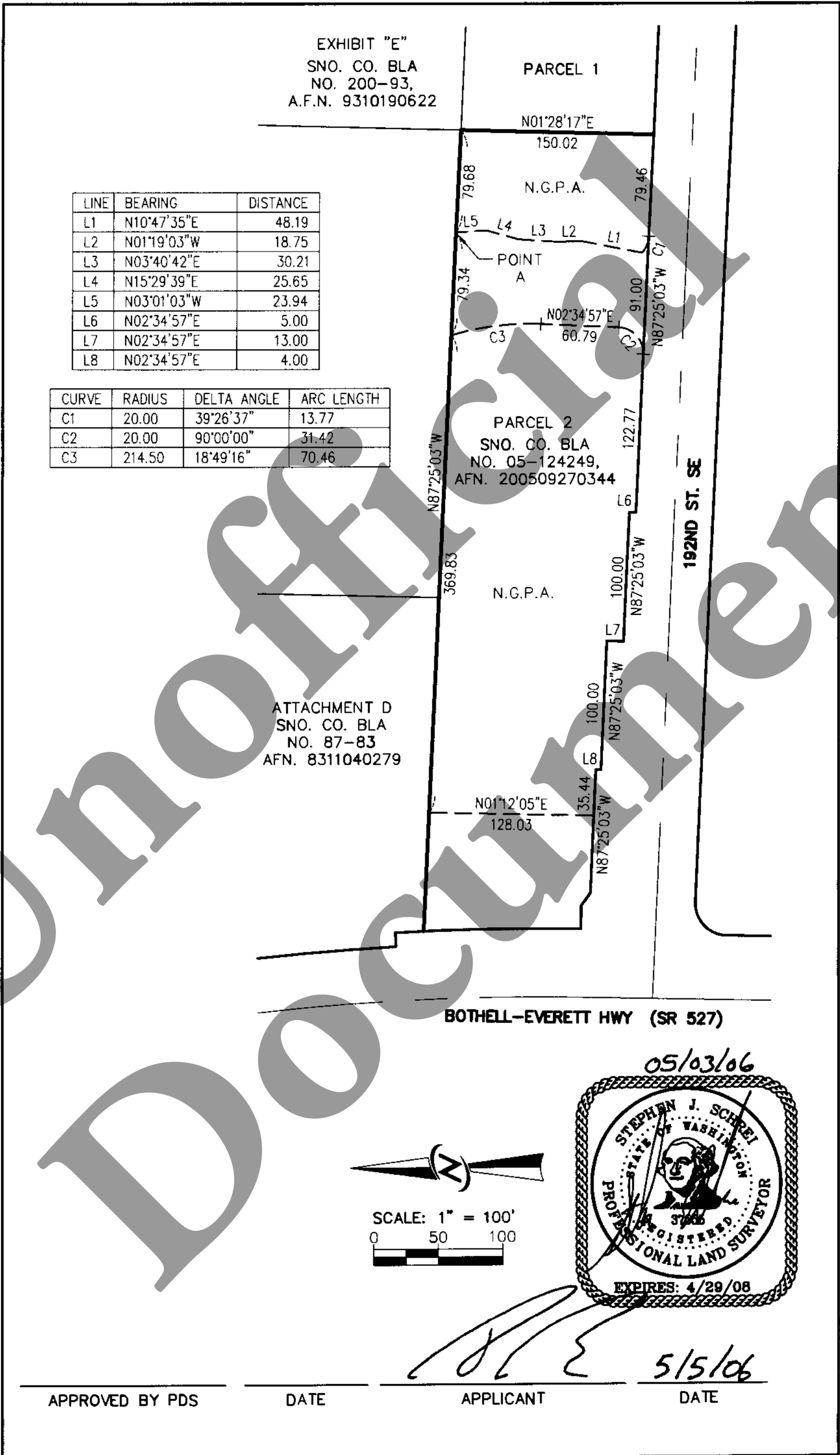

APPLICANT

5/5/06
DATE

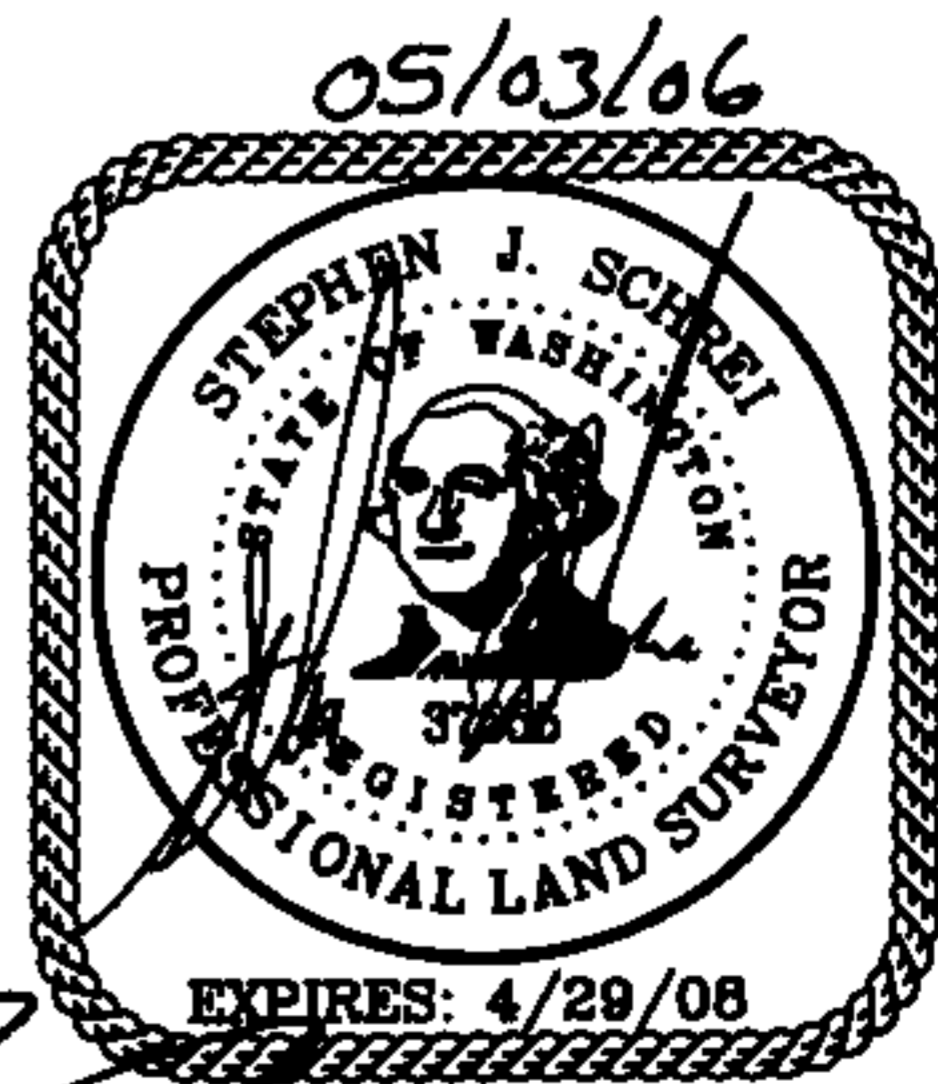
APPLICANT: CREEKSIDE CROSSING, L.L.C.
 PROJECT #: 04-1105516LU
 TAX ACCT #: 27051700300900

SITE PLAN:

3 OF 4



SCALE: 1" = 100'
 0 50 100



[Signature] 5/5/06

APPROVED BY PDS _____ DATE _____ APPLICANT _____ DATE _____

APPLICANT: CREEKSIDE CROSSING, L.L.C.
PROJECT #: 04-1105516LU
TAX ACCT #: 27051700300900

4 OF 4

IN WITNESS WHEREOF WE SET OUR HANDS AND SEALS THIS 5th DAY OF
May, 2006.

BY: Shelley Bowman



OREGON
STATE OF ~~WASHINGTON~~)
COUNTY OF Clackamas) SS

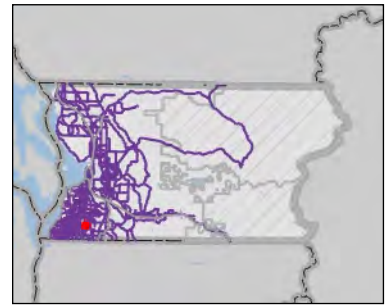
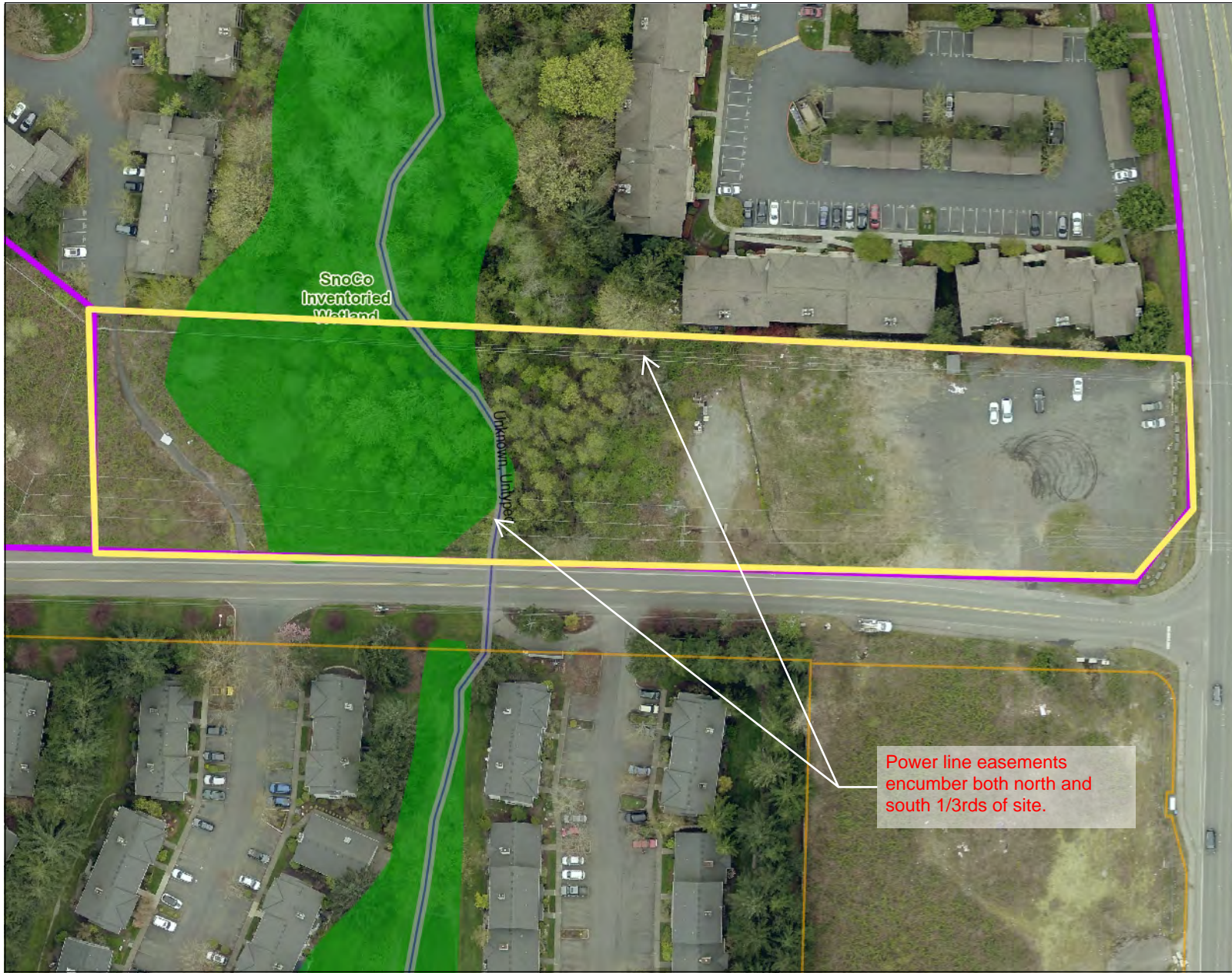
I CERTIFY THAT I KNOW OR HAVE SATISFACTORY EVIDENCE THAT Derek L. Brown
IS THE PERSON WHO APPEARED BEFORE ME, AND SAID PERSON ACKNOWLEDGED THAT
HE SIGNED THIS INSTRUMENT, ON OATH STATED THAT HE WAS AUTHORIZED TO EXECUTE
THE INSTRUMENT AND ACKNOWLEDGED IT AS a member OF
CREEKSIDE CROSSING, L.L.C., TO BE THE FREE AND VOLUNTARY ACT OF SUCH PARTY
FOR THE USES AND PURPOSES MENTIONED IN THE INSTRUMENT.

DATED: 05/05, 2006.

SIGNATURE: Shelley Bowman
Shelley Bowman
(NOTARY NAME TO BE PRINTED)

NOTARY PUBLIC IN AND FOR THE
STATE OF WASHINGTON, RESIDING AT Lake Oswego
MY COMMISSION EXPIRES 4/16/10

OREGON



Legend

- Critical Area Site Plans
- Snohomish County Tax Parcels
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1: 1,200



200.0 0 100.0 200.0 Feet

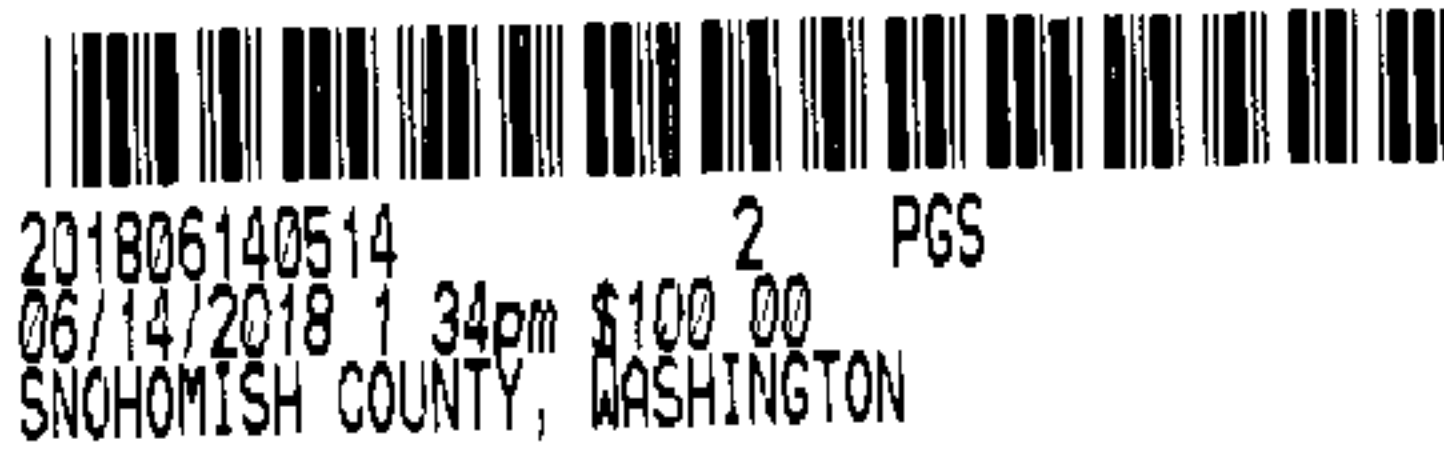
Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

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Notes

This map was automatically generated using Geocortex Essentials.

Return Address: John Swanson
19228 Locust Way
Lynnwood, WA 98036



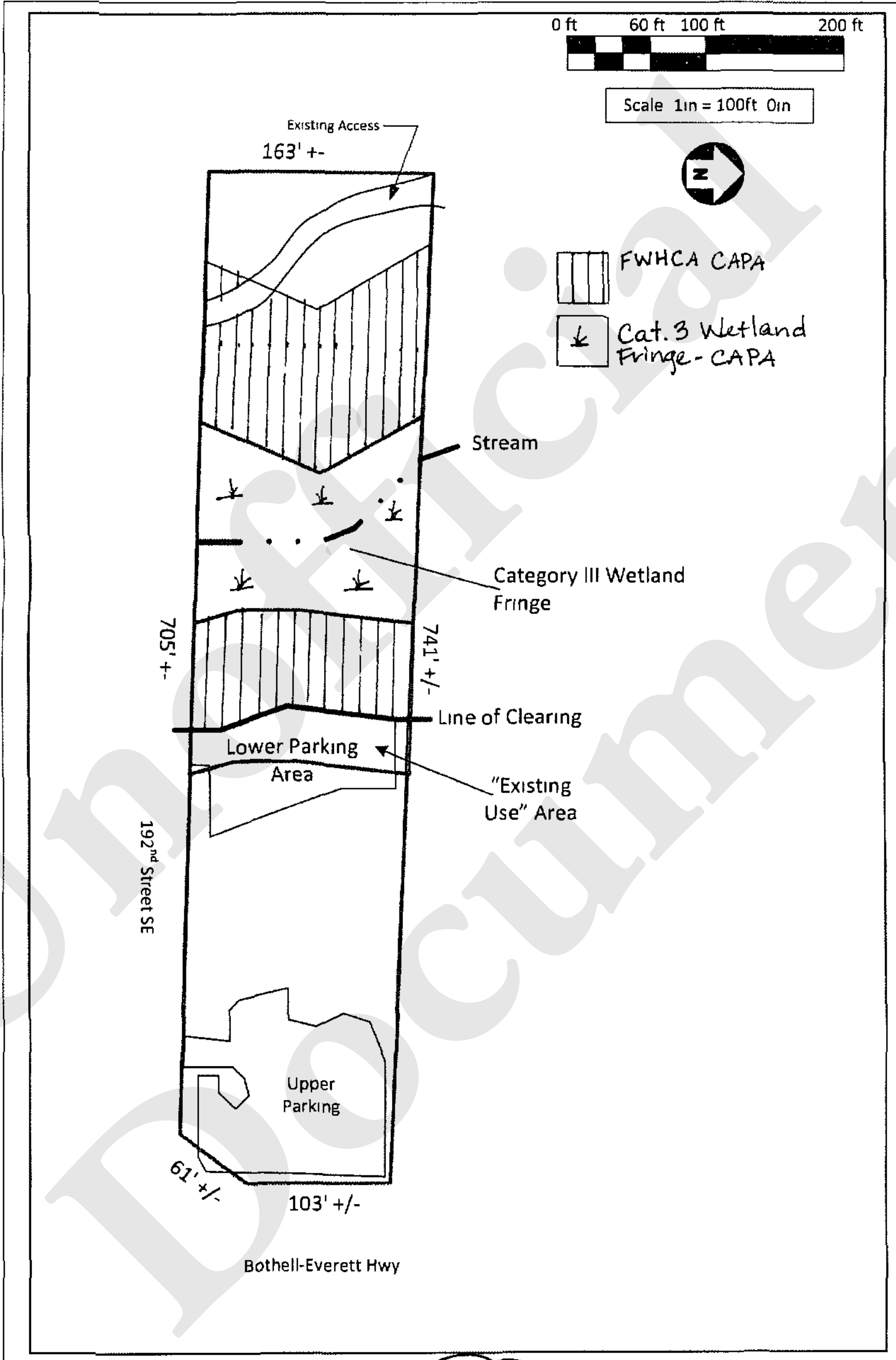
CRITICAL AREAS SITE PLAN

Project # 17-114967LDA		Applicant John Swanson	
Site Address			
Tax Acct # 270518-004-048-00			
Critical Area Sq. Ft. : 50,530 sf +/-		Buffer Sq. Ft. :	
ZONE LDMR			
FRONT SETBACK			
SIDE SETBACK			
REAR SETBACK		& Subject to Critical Area Protection Area	
BUILDING HEIGHT	CORNER LOT REQUIRES FRONT SETBACK FROM BOTH STREETS		
REFERENCE NUMBER(S) OF RELATED DOCUMENTS		1 OF _____	
GRANTOR(S) (OWNERS OF PROPERTY)			
SWANSON _____		JOHN _____	
LAST NAME		FIRST NAME	MI
GRANTEE(S) SAME AS ABOVE			
Legal Description:			
Section 18 Township 27 Range 5 Quarter SE - E 750.00FT OF TH PTN NE1/4 SE1/4 DAF BEG SW COR SD SUB TH N00*05 13E ALG W LN SD SUB 30FT TPB TH CONT N00*05 13E ALG SD W LN 464.18FT TH S51*53 19E508 84FT TH S87*25 08E 754.77FT TO WLY MGN BOTHELL WAY TH SLY ALG SD WLY HWY MGN 150 22FT TO N LN S 30FT IN WIDTH OF SD SUB TH TH N88*16 20W TO POB LESS R/W TO ST OF WA PER WD REC AF NO 9203260404 ALSO LESS FDP TH PTN NE1/4 SE1/4 DAF COM AT SW COR SD SUB; TH N00*05 13E ALG W LN SD SUB 30.01FT TO NLY R/W 192ND ST SE & TPB, TH CONT N00*05 13E ALG SD W LN 261.06FT; TH S51*53 19E 387 73FT THS09*17 54W 31.21FT TO NLY MGN 192ND ST SE, TH N88*16 20W 300 56FT TO POB PER QCD REC AFN 200605241120			
<input type="checkbox"/>		Additional legal description is on page _____ of document	

CRITICAL AREA PROTECTION AREA is to be left permanently undisturbed in a substantially natural state. No clearing, grading, filling, building construction or placement, or road construction of any kind shall occur, except removal of hazardous trees. Representations on this site plan may be approximations only and should not be used for purposes other than for determining general locations of critical areas. Development activities beyond the scope of this plan may require additional studies and approvals.

APPLICANT John Swanson
 PROJECT # 17-114967LDA
 TAX ACCT# 270518-004-048-00

SITE PLAN



[Signature]

APPROVED SNO CO PDS

6-5-18

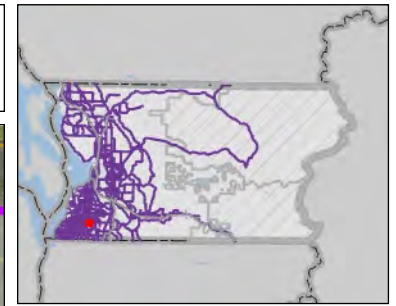
DATE

[Signature]

APPLICANT

06/14/18

DATE



Legend

- Critical Area Site Plans
- Snohomish County Tax Parcels
- All Fish Distributions
- Snohomish County Streams**
 - Shorelines of Statewide Significance
 - Shorelines of the State
 - Fish Habitat
 - Non-fish Habitat Perennial
 - Non-fish Habitat Seasonal
 - Unknown, Untyped
- Snohomish County Water Bodies**
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 - Estuarine and Marine Deepwater
 - Estuarine and Marine Wetland
 - Freshwater Emergent Wetland
 - Freshwater Forested/Shrub Wetland
 - Freshwater Pond
 - Lake
 - Other
 - Riverine
- Snohomish County Wetland Inventory
- Tulalip Wetlands**
 - Critical
 - High
 - Moderate
- Remote Sensing-based Wetland Model

1: 776



129.3 0 64.65 129.3 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

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Notes

This map was automatically generated using Geocortex Essentials.

Return Address: Daniel Arreola
 1112 183rd St. SE
 Bothell, WA 98012

CRITICAL AREA SITE PLAN

Project #: 23110150LDA Applicant: Daniel Arreola Site Address: 1112 183rd St. SE Bothell, WA 98012 Tax Acct. #: 27051800105800	
REFERENCE NUMBER(S) OF RELATED DOCUMENTS:	<u>1 of 2</u>
GRANTOR(S) (OWNERS OF PROPERTY):	
ARREOLA	DANIEL
ARREOLA	NOHEMI
LAST NAME	FIRST NAME
	L MI
GRANTEE(S): SAME AS ABOVE:	

<p>Legal Description: ALL THAT PORTION OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SECTION 18, TOWNSHIP 27 NORTH, RANGE 5 EAST, W.M., IN SNOHOMISH COUNTY, WASHINGTON, DESCRIBED AS FOLLOWS:</p> <p>COMMENCING AT THE SOUTHEAST CORNER OF SAID SUBDIVISION; THENCE WEST ALONG THE SOUTH LINE OF SAID SUBDIVISION, FOR 18.33 FEET TO THE TRUE POINT OF BEGINNING; THENCE WEST ON SAID SOUTH LINE 1287 FEET, MORE OR LESS, TO A POINT 14.67 FEET EAST OF THE WEST LINE OF SAID SUBDIVISION; THENCE NORTH 338.5 FEET; THENCE EAST 1287 FEET TO A POINT 18.33 FEET WEST OF THE EAST LINE OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION 18; THENCE SOUTH 338.5 FEET TO THE TRUE POINT OF BEGINNING;</p> <p>EXCEPT THE EAST 941 FEET THEREOF;</p> <p>(ALSO KNOWN AS TRACT "A" OF SNOHOMISH COUNTY SHORT PLAT NO. SP305 (7-77), RECORDED UNDER RECORDING NUMBER 7709230207, RECORDS OF SNOHOMISH COUNTY AUDITOR).</p> <p>TOGETHER WITH THE NORTH 205 FEET OF THE FOLLOWING DESCRIBED PROPERTY;</p> <p>BEGINNING AT THE SOUTHWEST CORNER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION 18; THENCE EAST 14.67 FEET; THENCE NORTH 338.5 FEET TO THE SOUTH LINE OF BAILEY ROAD; THENCE WEST TO THE WEST LINE OF SAID SUBDIVISION; THENCE SOUTH TO THE POINT OF BEGINNING.</p> <p>SITUATE IN THE COUNTY OF SNOHOMISH, STATE OF WASHINGTON.</p> <p><input type="checkbox"/> Additional legal description is on page ____ of document</p>
--

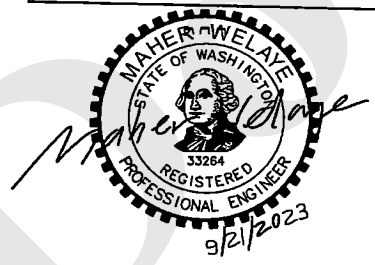
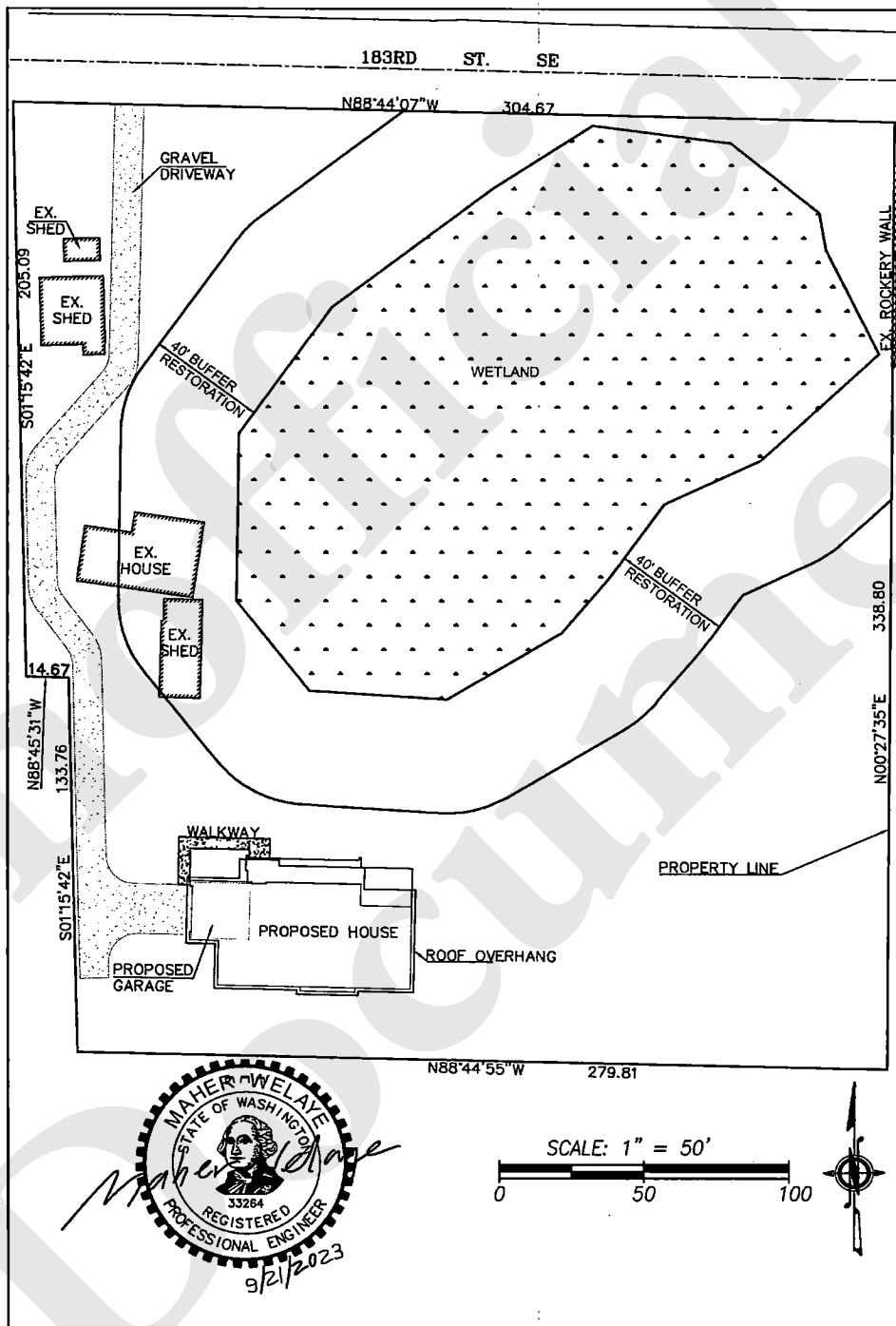
In consideration of Snohomish County Code requirements, except as otherwise provided herein, the CAPA (Critical Area Protection Area) shall be left permanently undisturbed in a substantially natural state.

Exceptions: The following are allowed in CAPAs: Existing legally established uses and structures (see site plan); Non-ground disturbing interior or exterior building improvements; routine landscape maintenance of established, ornamental landscaping; non ground disturbing normal maintenance or repair; removal of noxious weeds conducted in accordance with chapter 16-750 WAC; maintenance or replacement that does not expand the affected area of the following existing facilities: (a) septic tanks and drainfields; (b) wells; (c) individual utility service connections; data collection by non-mechanical means, and non-mechanical survey and monument placement.

Applicant: Daniel Arreola
 Project #: 23110150LDA
 Tax Acct. #: 27051800105800

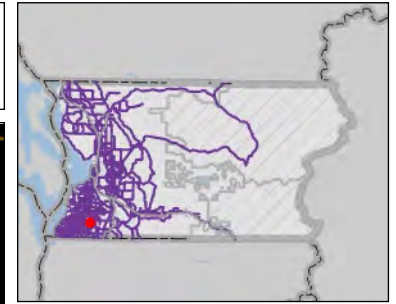
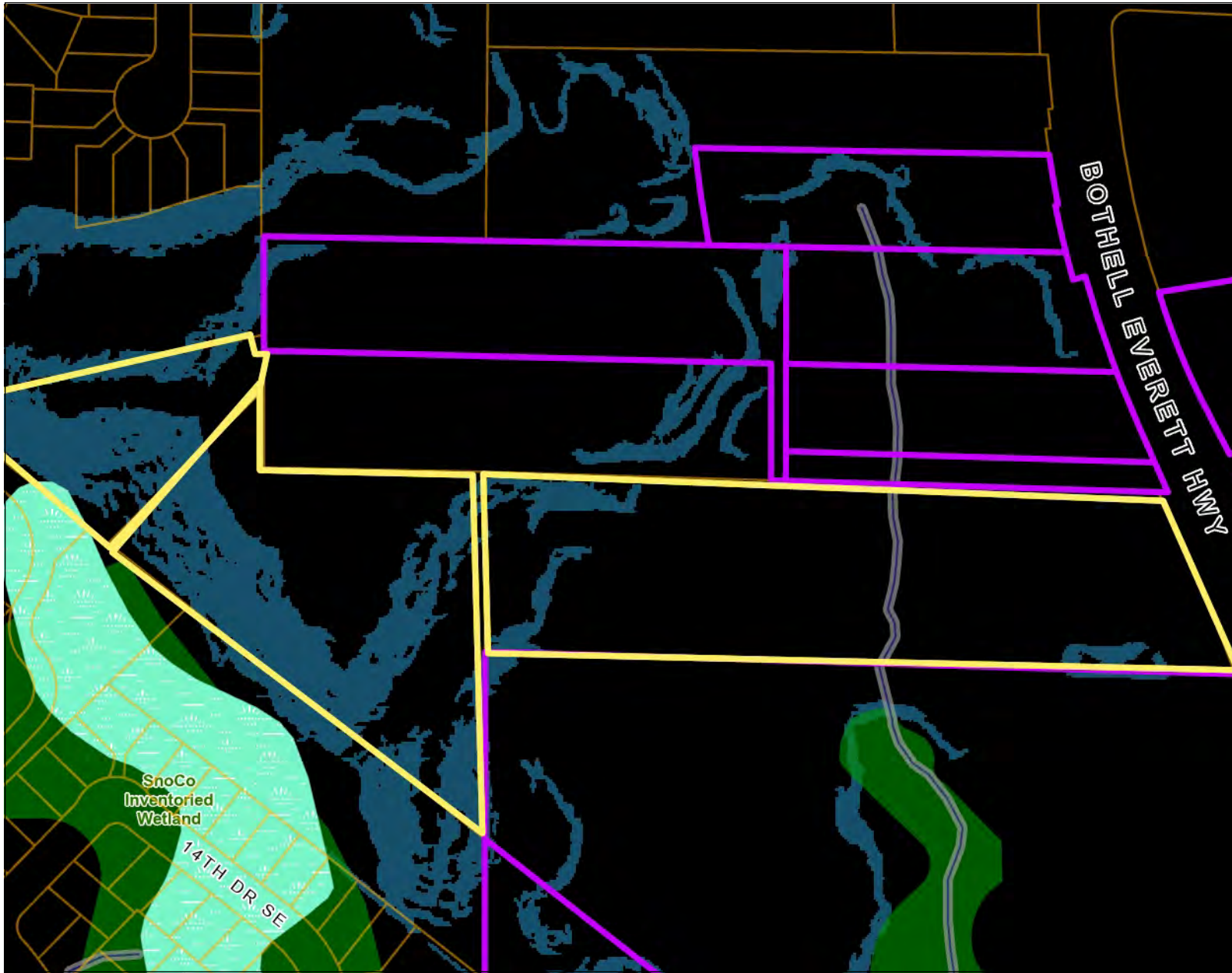
SITE PLAN:

2 OF 2



Representation on this site plan may be approximations only and should not be used for purposes other than for determining general locations of critical areas and buffers.

APPROVED
 Monica Sgarvas 09/25/2023 DATE OWNER(S) DATE
 APPROVED SNOCO PDS DATE OWNER(S) DATE



Legend

- Critical Area Site Plans
- Snohomish County Tax Parcels
- All Fish Distributions
- Snohomish County Streams**
 - Shorelines of Statewide Significance
 - Shorelines of the State
 - Fish Habitat
 - Non-fish Habitat Perennial
 - Non-fish Habitat Seasonal
 - Unknown, Untyped
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 - Estuarine and Marine Wetland
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 - Freshwater Forested/Shrub Wetland
 - Freshwater Pond
 - Lake
 - Other
 - Riverine
- Snohomish County Wetland Inventory**
- Tulip Wetlands**
 - Critical
 - High
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- Remote Sensing-based Wetland Model

1: 2,400



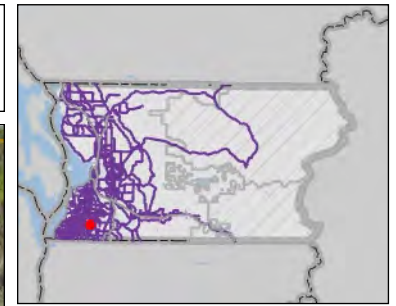
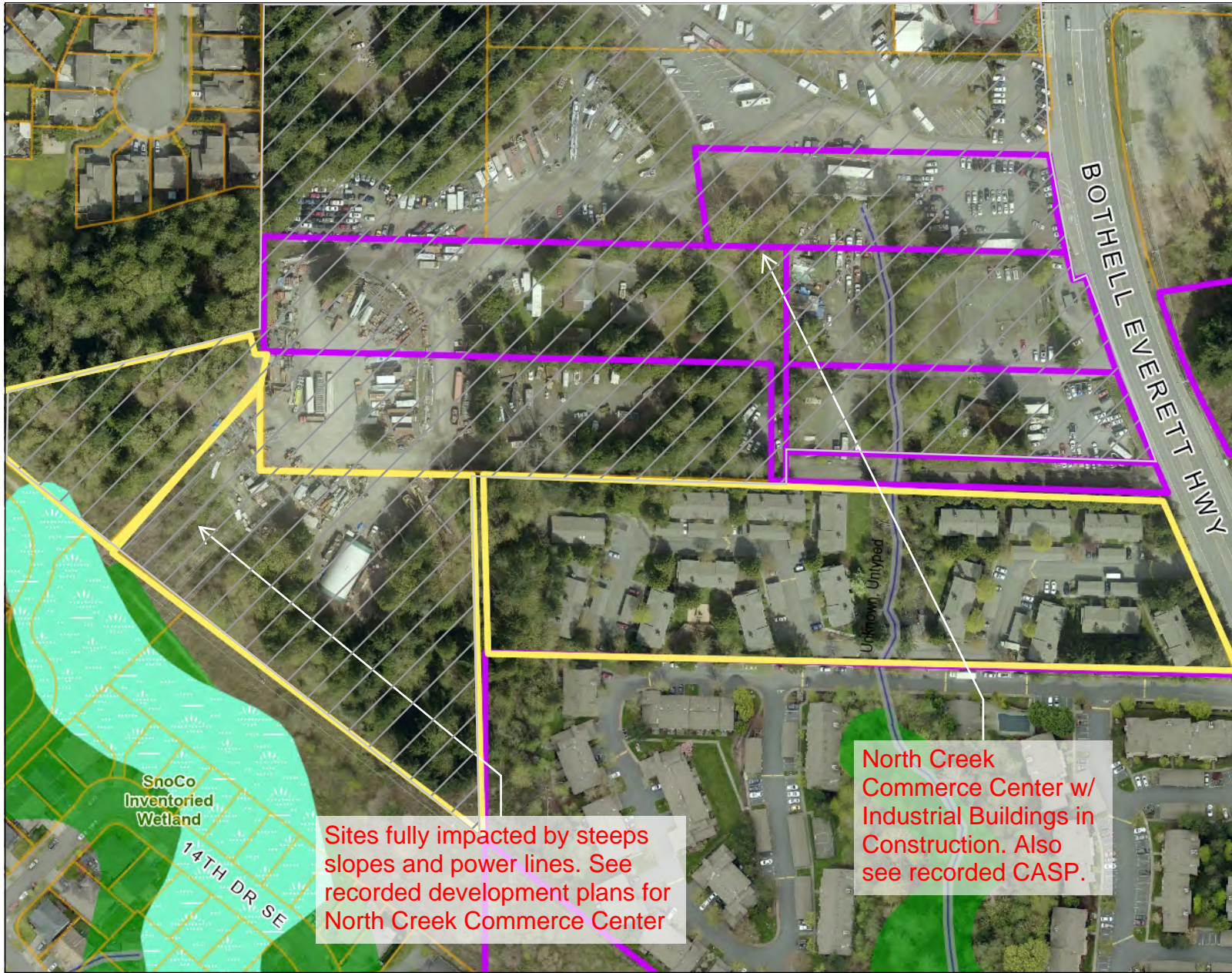
400.0 0 200.00 400.0 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

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Notes

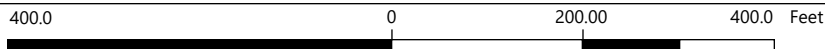
This map was automatically generated using Geocortex Essentials.



Legend

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 - Riverine
- Snohomish County Wetland Inventory**
- Tulalip Wetlands**
 - Critical
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1:2,400



Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
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Notes

This map was automatically generated using Geocortex Essentials.

8-

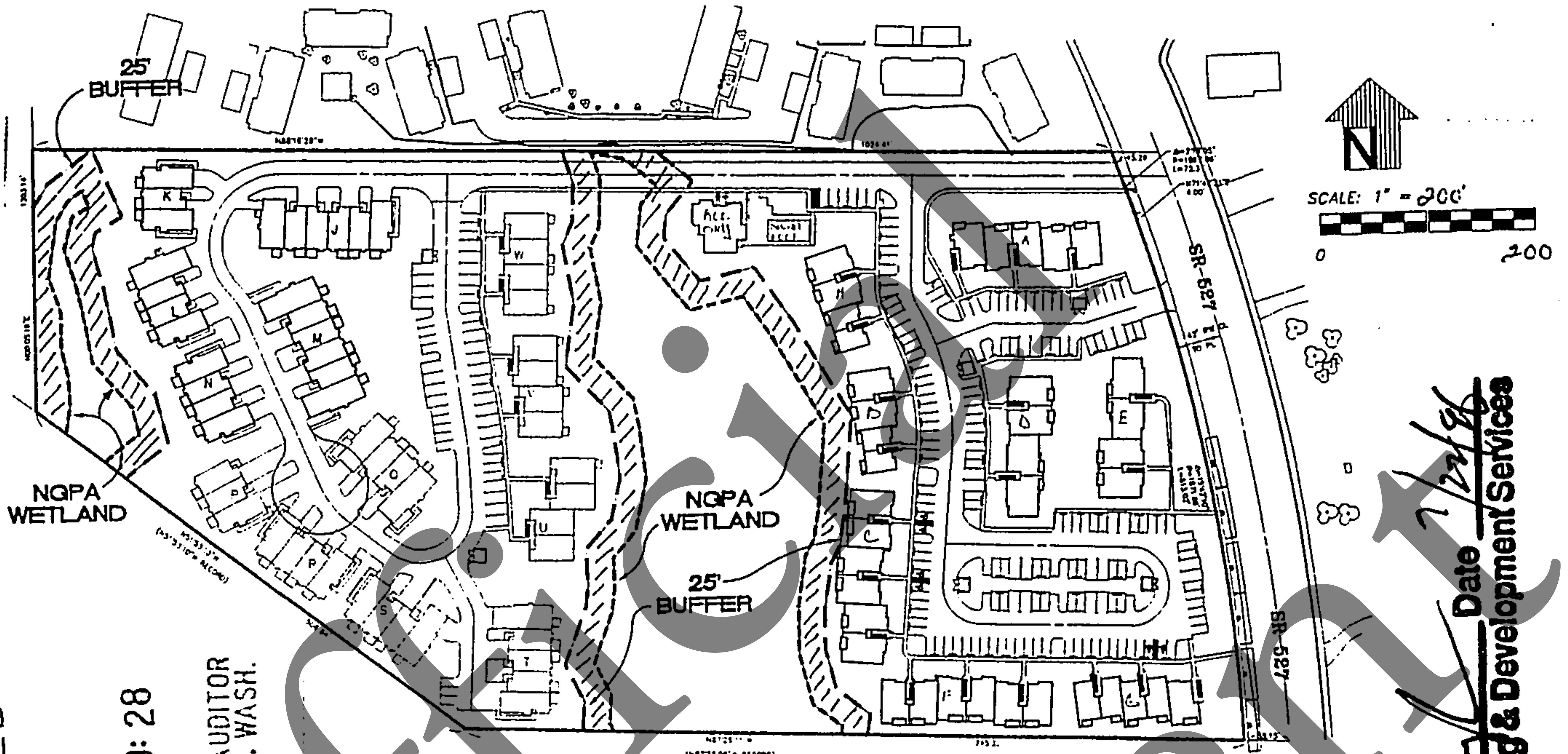
96-101422 CP+

CRITICAL AREAS SITE PLAN	
Project #	ZA 95108159 Applicant SUNDQUIST HOMES, INC.
Mailing address	PO. Box 958 LYNNWOOD, WA 98046
Site address	18930 Bothell- Everett Hwy, Bothell, WA 98012
Tax Acct. #	182705-4-005-0001
Critical Area Sq. Ft.	87,231
Buffer Sq. Ft.	47,366

RECEIVED
 1996
 PLANNING & DEVELOPMENT SERVICES - BUILDING DIV.

RECORDED BY SNOHOMISH COUNTY: BOB TERWILLIGER, AUDITOR

960802006



All structures are proposed

RECORDED

96 AUG -2 AM 9:28

AUDITOR SNOHOMISH COUNTY, WASH. DEPUTY

Approved by *R. McCall* Date *7/27/96*
 Snohomish County Planning & Development Services

LEGAL DESCRIPTION

THE SOUTH 990.00 FEET OF THAT PORTION OF THE NORTHEAST QUARTER OF THE SOUTHEAST QUARTER LYING WESTERLY OF THE PACIFIC HIGHWAY (SR 527) IN SECTION 18, TOWNSHIP 27 NORTH, RANGE 5 EAST, W.M., SNOHOMISH COUNTY WASHINGTON;

EXCEPT THE SOUTH 30.00 FEET THEREOF CONVEYED TO SNOHOMISH COUNTY UNDER AUDITOR'S FILE NOS. 388207 AND 523403;

AND EXCEPT THAT PORTION CONDEMNED BY THE STATE OF WASHINGTON FOR SR 527 BY DECREE ENTERED IN SNOHOMISH COUNTY SUPERIOR COURT CAUSE NUMBER 92-2-06071-8;

AND EXCEPT THAT PORTION THEREOF CONVEYED TO THE STATE OF WASHINGTON BY DEED RECORDED UNDER AUDITOR'S FILE NUMBER 9606120003;

AND EXCEPT THE NORTH 243.00 FEET THEREOF;

AND EXCEPT THE FOLLOWING DESCRIBED TRACT:
 BEGINNING AT THE SOUTHWEST CORNER OF SAID SUBDIVISION;
 THENCE NORTH 0°05'22" EAST ALONG THE WEST LINE OF SAID SUBDIVISION 30 FEET TO TRUE POINT OF BEGINNING;
 THENCE CONTINUING NORTH 0°05'22" EAST ALONG SAID WEST LINE 464.18 FEET;
 THENCE SOUTH 51°53'10" EAST 508.84 FEET;
 THENCE SOUTH 87°25'08" EAST 754.77 FEET TO WESTERLY MARGIN OF BOTHELL WAY;
 THENCE SOUTHERLY ALONG SAID WESTERLY MARGIN 150.22 FEET TO THE NORTH LINE OF THE SOUTH 30 FEET IN WIDTH OF SAID SUBDIVISION;
 THENCE NORTH 88°17'09" WEST TO TRUE POINT OF BEGINNING;

SITUATE IN THE COUNTY OF SNOHOMISH, STATE OF WASHINGTON.

NATIVE GROWTH PROTECTION AREA is to be left permanently undisturbed in a substantially natural state. No clearing, grading, filling, building construction or placement, or road construction of any kind shall occur, except removal of hazardous trees. The activities as set forth in SCC 32.10.110(27) a, c, d, are allowed when approved by the County.

Representations on this site plan may be approximations only and should not be used for purposes other than for determining general locations of critical areas. Development activities beyond the scope of this plan may require additional studies and approvals.

Return Address:
 North Creek Commerce Center, LLC
 1821 Dock St. Ste 100
 Tacoma, WA 98402

CRITICAL AREA SITE PLAN

Project #: PFN# 22-107347 LDA		
Applicant: North Creek Commerce Center, LLC		
Site Address: 18712 Bothell Everett Hwy		
Tax Acct. #: 27051800402700, 27051800400601, 27051800404700, 27051800104300		
REFERENCE NUMBER(S) OF RELATED DOCUMENTS:		1 of <u>2</u>
GRANTOR(S) (OWNERS OF PROPERTY):		
<u>North Creek Commerce Center, LLC</u>		
LAST NAME	FIRST NAME	MI
GRANTEE(S): SAME AS ABOVE:		

Legal Description:

PARENT PARCEL LEGAL DESCRIPTIONS

PARCEL E: 270518-001-043-00

THE EAST 495 FEET OF THE SOUTH 132 FEET OF THAT PORTION OF THE SOUTH HALF OF THE SOUTHEAST QUARTER OF THE NORTHEAST QUARTER OF SECTION 18, TOWNSHIP 27 NORTH, RANGE 05 EAST, W.M., LYING WESTERLY OF PACIFIC HIGHWAY, SITUATE IN THE COUNTY OF SNOHOMISH, STATE OF WASHINGTON.

EXCEPT THAT PORTION CONVEYED TO THE STATE OF WASHINGTON UNDER RECORDING NO. 9204090435 RECORDED APRIL 09, 1992.

PARCEL F: 270518-004-006-02

PARCEL A OF BOUNDARY LINE ADJUSTMENT 04-111852 RECORDED AUGUST 09, 2004 UNDER RECORDING NUMBER 200408090901, BEING A PORTION OF THE SOUTHEAST QUARTER OF SECTION 18, TOWNSHIP 27 NORTH, RANGE 5 EAST, W.M. IN SNOHOMISH COUNTY, WASHINGTON.

PARCEL G: 270518-004-047-00

PARCEL B OF BOUNDARY LINE ADJUSTMENT 04-119414 RECORDED NOVEMBER 11, 2004 UNDER RECORDING NUMBER 200411230681, BEING A PORTION OF THE SOUTHEAST QUARTER OF SECTION 18, TOWNSHIP 27 NORTH, RANGE 5 EAST, W.M. IN SNOHOMISH COUNTY, WASHINGTON.

PARCEL H: 270518-004-027-00

PARCEL A OF BOUNDARY LINE ADJUSTMENT 04-119414 RECORDED NOVEMBER 11, 2004 UNDER RECORDING NUMBER 200411230681, BEING A PORTION OF THE SOUTHEAST QUARTER OF SECTION 18, TOWNSHIP 27 NORTH, RANGE 5 EAST, W.M. IN SNOHOMISH COUNTY, WASHINGTON.

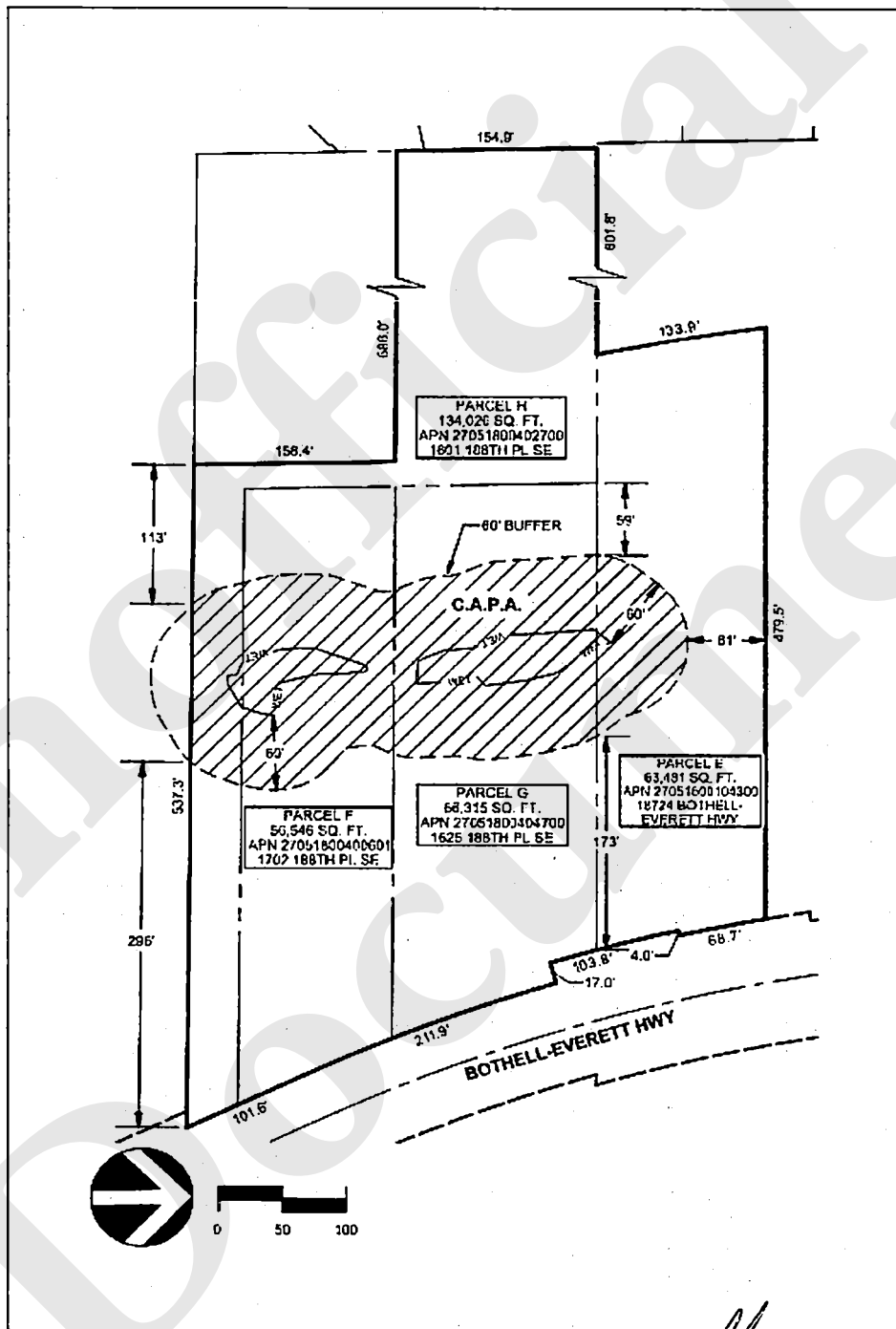
In consideration of Snohomish County Code requirements, except as otherwise provided herein, the CAPA (Critical Area Protection Area) shall be left permanently undisturbed in a substantially natural state.

Exceptions: The following are allowed in CAPAs: Existing legally established uses and structures (see site plan); Non-ground disturbing interior or exterior building improvements; routine landscape maintenance of established, ornamental landscaping; non ground disturbing normal maintenance or repair; removal of noxious weeds conducted in accordance with chapter 16-750 WAC; maintenance or replacement that does not expand the affected area of the following existing facilities: (a) septic tanks and drainfields; (b) wells; (c) individual utility service connections; data collection by non-mechanical means, and non-mechanical survey and monument placement.

Applicant: North Creek Commerce Center, LLC
Project #: PFN# 22-107347 LDA
Tax Acct. #: 27051800402700, 27051800400601, 27051800404700, 27051800104300

SITE PLAN:

2 OF 2



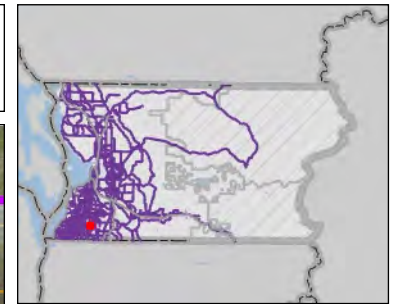
Representation on this site plan may be approximations only and should not be used for purposes other than for determining general locations of critical areas and buffers.

Neil Stout
APPROVED SNOCO PDS

08/02/2023
DATE

[Signature]
OWNER(S)

8/3/23
DATE



Legend

- Critical Area Site Plans
- Snohomish County Tax Parcels
- All Fish Distributions
- Snohomish County Streams**
 - Shorelines of Statewide Significance
 - Shorelines of the State
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 - Non-fish Habitat Seasonal
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 - Freshwater Forested/Shrub Wetland
 - Freshwater Pond
 - Lake
 - Other
 - Riverine
- Snohomish County Wetland Inventory**
- Tulalip Wetlands**
 - Critical
 - High
 - Moderate
- Remote Sensing-based Wetland Model

1: 1,562



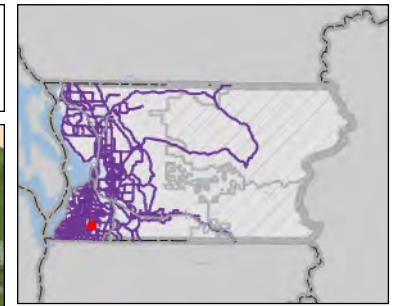
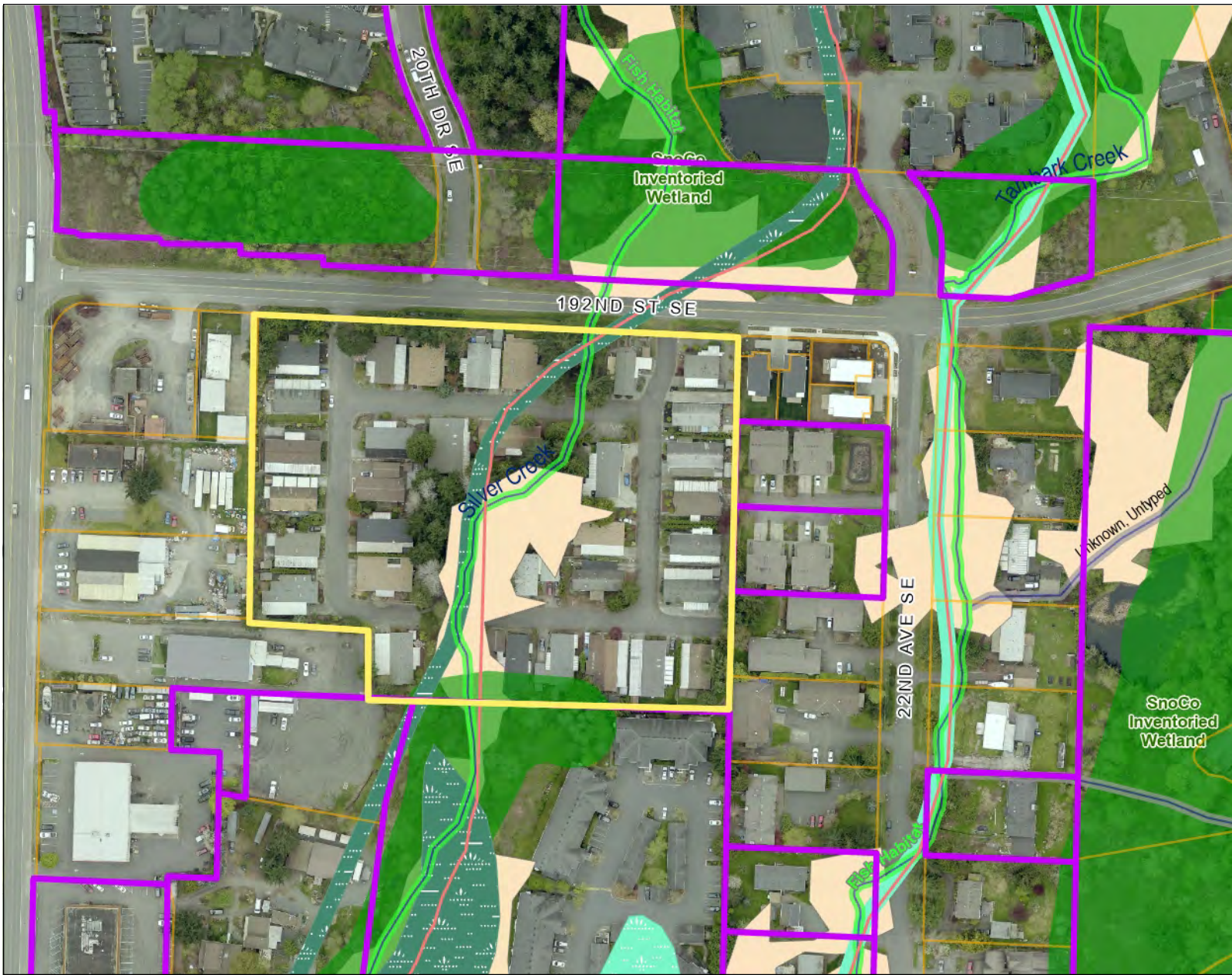
260.4 0 130.19 260.4 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

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Notes

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Legend

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- Snohomish County Tax Parcels
- All Fish Distributions
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 - Freshwater Pond
 - Lake
 - Other
 - Riverine
- Snohomish County Wetland Inventory**
 - Tulip Wetlands
 - Critical
 - High
 - Moderate
 - Remote Sensing-based Wetland Model

1: 2,182



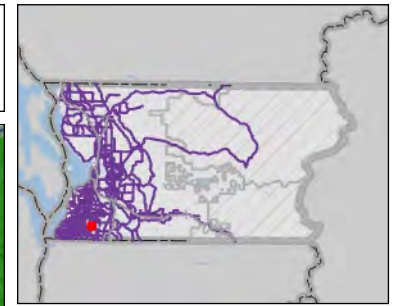
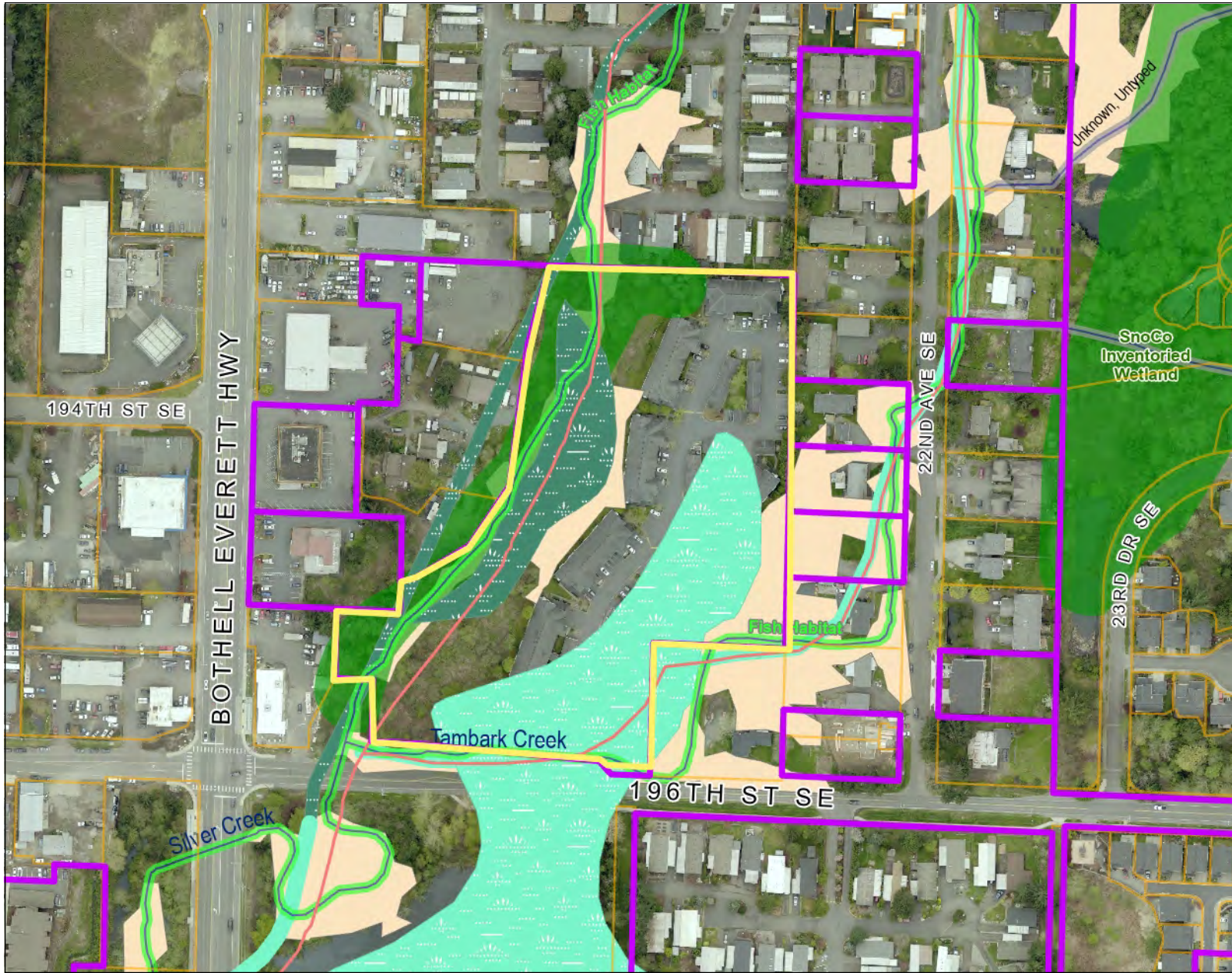
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Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

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 - Lake
 - Other
 - Riverine
- Snohomish County Wetland Inventory**
- Tulalip Wetlands**
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- Remote Sensing-based Wetland Model

1: 2,808



468.0 0 233.99 468.0 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

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Notes

This map was automatically generated using Geocortex Essentials.

Return Address: Avance Group IV, L.L.C.
18404 104th Av NE
Bothell, WA 98011



9808070709
08/07/98 15:05
p.0004 Recorded
Snohomish County

6020208086

CRITICAL AREAS SITE PLAN

Project #: 97-106870- CP Applicant: Avance Group IV, L.L.C.	
Site Address: 2009 196th St SE Bothell, WA 98012	
Tax Acct. #: 172705-3-011-0006	
Critical Area Sq. Ft. : 100560	Buffer Sq. Ft. 104744
CHICAGO E30031	
ZONE: <u>LDMR</u>	
FRONT SETBACK <u>25' 2-story, 28' 3-story</u>	
SIDE SETBACK <u>10' 2-story, 13' 3-story</u>	
REAR SETBACK <u>10' 2-story, 13' 3-story</u>	
BUILDING HEIGHT <u>35'</u> CORNER LOT REQUIRES FRONT SETBACK FROM BOTH STREETS	
REFERENCE NUMBER(S) OF RELATED DOCUMENTS:	1 OF _____
<u>NA</u>	
GRANTOR(S) (OWNERS OF PROPERTY):	
<u>Edward Hedious</u>	
<u>Avance Group IV, L.L.C</u>	
LAST NAME	FIRST NAME MI
GRANTEE(S): SAME AS ABOVE <u>Public</u>	
Legal Description:	
<input checked="" type="checkbox"/> Additional legal description is on page <u>2</u> of document	

NATIVE GROWTH PROTECTION AREA is to be left permanently undisturbed in a substantially natural state. No clearing, grading, filling, building construction or placement, or road construction of any kind shall occur, except removal of hazardous trees. The activities as set forth in SCC 32.10.110(29) a, c, d, are allowed when approved by the County.

Representations on this site plan may be approximations only and should not be used for purposes other than for determining general locations of critical areas. Development activities beyond the scope of this plan may require additional studies and approvals.

LEGAL DESCRIPTION

PARCEL A

That portion of the southwest quarter of the southwest quarter of Section 17, Township 27 North, Range 5 East, W.M., Snohomish County Washington, described as follows:

COMMENCING at the southwest corner of said subdivision; thence S87°26'01"E, along the south line of said subdivision, 180.04 feet; thence N01°23'25"E 260.05 feet; thence S87°26'01"E 100.02 feet to the southeast corner of that certain tract of land conveyed to Rachel E. Wilson and Kenneth William Wilson, her husband, by deed recorded under Auditor's File No. 859455 records of said county; thence N01°23'25"E, along the east line of said Wilson Tract, 48.72 feet to the POINT OF BEGINNING of the herein described tract; thence continuing N01°23'25"E, along said east line, 101.31 feet to the northeast corner of said Wilson Tract; thence N87°26'01"W, along the north line of said Wilson Tract, 238.05 feet to the east right-of-way margin of S.R.527 (Bothell Everett Highway); thence N01°23'25"E, along said east margin, 169.48 feet to the south line of the north 735.00 feet of said subdivision; thence S87°24'44"E, along said south line, 165.04 feet to the east line of the west 207.00 feet of said subdivision; thence N01°23'25"E, along said east line, 10.00 feet to the south line of the south 155.00 feet of the north 725.00 feet of said subdivision; thence S87°24'44"E, along said south line, 60.01 feet to the east line of the west 267.00 feet of said subdivision; thence N01°23'25"E, along said east line, 155.03 feet to the north line of said south 155.00 feet of the north 725.00 feet of said subdivision; thence N87°24'44"W, along said north line, 60.01 feet to the east line of the west 207.00 feet of said subdivision; thence N01°23'25"E, along said east line, 75.02 feet; thence S87°24'44"E 297.00 feet; thence S15°34'25"W 130.33 feet; thence S07°29'07"W 225.22 feet; thence S33°44'36"W 112.68 feet; thence S59°04'56"W 99.38 feet; thence S73°58'02"W 24.93 feet to the POINT OF BEGINNING.

EXCEPT that portion of the west 300.00 feet of the south 240.00 feet of the north 735.00 feet of the southwest quarter of the southwest quarter of said Section 17, described as follows:

BEGINNING at the northeast corner of said subdivision; thence S01°23'25"W, along the east line thereof, 129.46 feet; thence N79°19'11"W 33.44 feet to the east line of the west 267.00 feet of said subdivision; thence N01°23'25"E, along said east line, 49.74 feet to the north line of the south 155.00 feet of said subdivision; thence N87°24'44"W, along said north line, 60.01 feet to the east line of the west 207.00 feet of said subdivision; thence N01°23'25"E, along said east line, 75.02 feet to the north line of said subdivision; thence S87°24'44"E, along said north line, 93.02 feet to the POINT OF BEGINNING.

Contains 123,689± square feet (2.8395± Acres).

PARCEL B

That portion of the southwest quarter of the southwest quarter of Section 17, Township 27 North, Range 5 East, W.M., Snohomish County Washington, described as follows:

COMMENCING at the southwest corner of said subdivision; thence S87°26'01"E, along the south line of said subdivision, 180.04 feet; thence N01°23'25"E 152.43 feet to the north line of that certain tract of land deeded to the State of Washington under Auditor's File No. 9203300540 records of said county and the POINT OF BEGINNING of the herein described Tract; thence continuing N01°23'25"E 107.62 feet; thence S87°26'01"E 100.02 feet to the southeast corner of that certain tract of land conveyed to Rachel E. Wilson and Kenneth William Wilson, her husband, by deed recorded under Auditor's File No. 859455 records of said county; thence N01°23'25"E, along the east line of said Wilson Tract, 48.72 feet; thence N73°58'02"E 24.93 feet; thence N59°04'56"E 99.38 feet; thence N33°44'36"E 112.68 feet; thence N07°29'07"E 225.22 feet; thence N15°34'25"E 130.33 feet; thence S87°24'44"E 387.70 feet to the west line of the east 430.00 feet of said subdivision; thence S01°28'26"W, along said west line, 590.57 feet to the north line of the south 228.71 feet of said subdivision; thence N87°26'01"W, along said north line, 208.71 feet; thence S01°28'26"W 208.71 feet to the north right-of-way margin of 196th Street SE; thence westerly along said north margin, the following 6 courses and distances; thence N87°26'01"W 61.45 feet to the southeast corner of that certain tract conveyed to the State of Washington under Auditor's File No. 9203300540 records of said county; thence N42°26'01"W 28.28 feet; thence N84°34'17"W 300.37 feet; thence N87°26'01"W 61.10 feet; thence N01°23'25"E 97.42 feet; thence N87°26'01"W 59.99 feet to the POINT OF BEGINNING.

Contains 366,516± square feet (8.4141± Ac.)

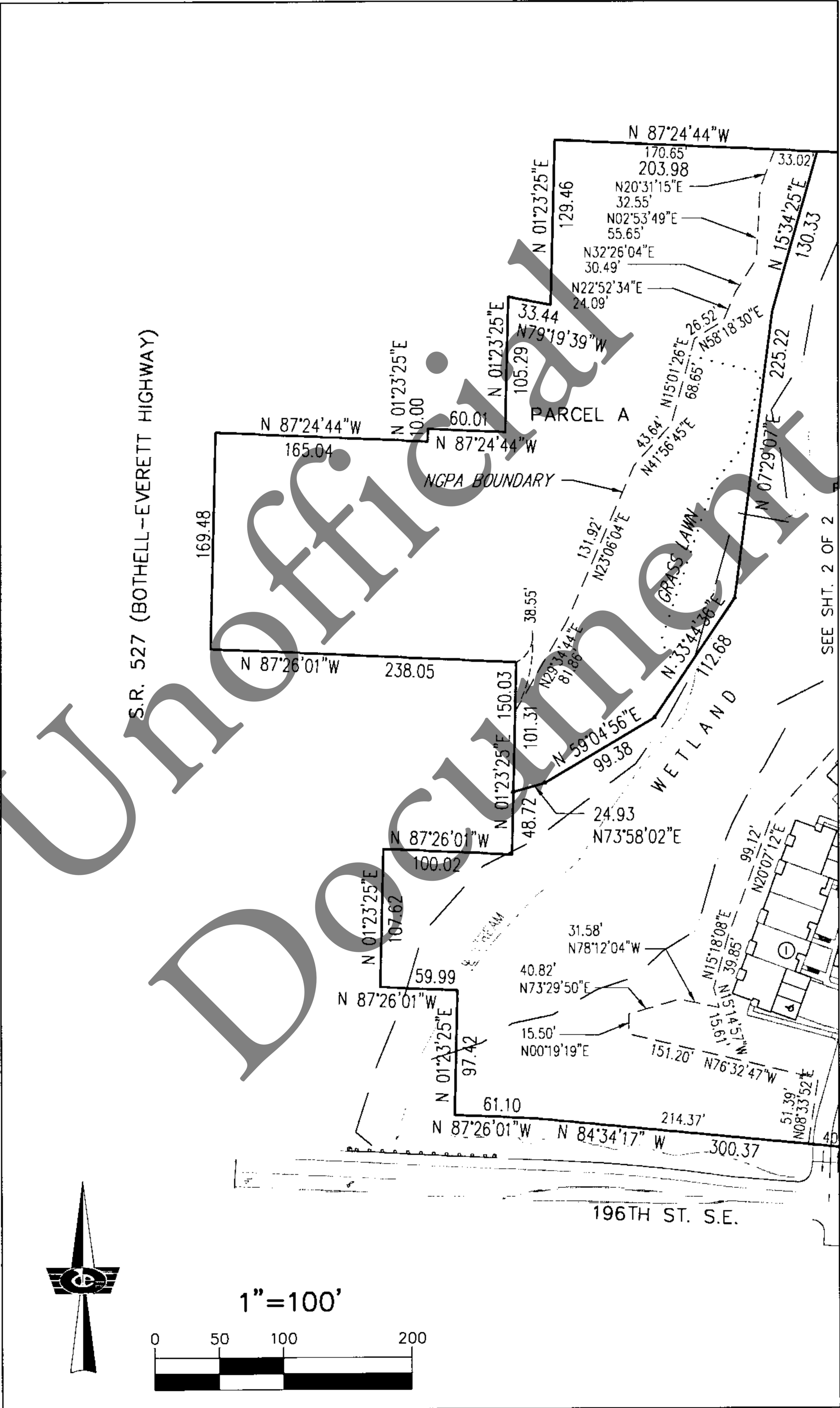
Tax Account Number Parcels A and B: 172705-3-011

9808070709

APPLICANT: Avance Group IV, L.L.C.
 PROJECT #: 97-106870 CP
 TAX ACCT #: 172705-3-011-0006

SITE PLAN:

1 of 2

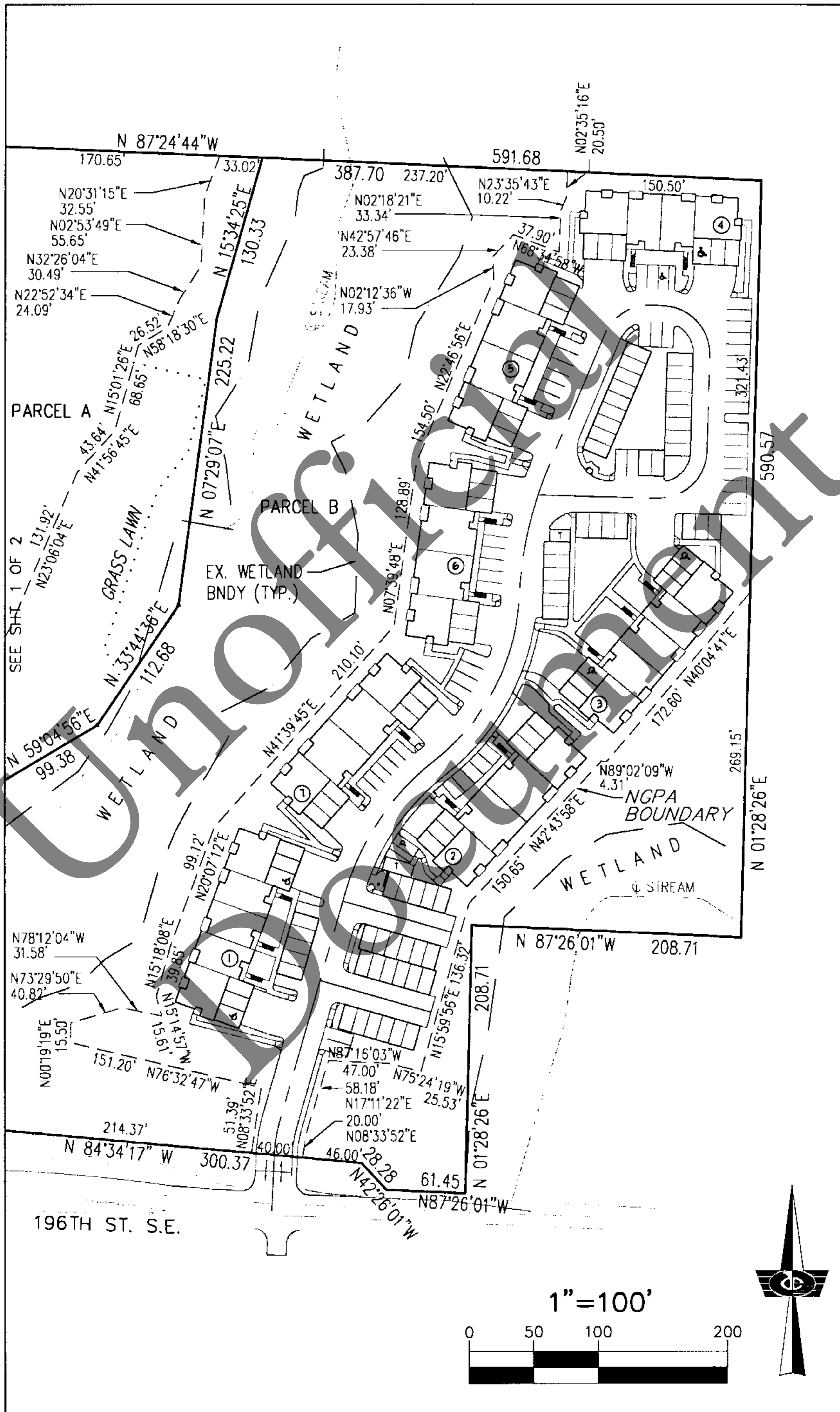


9808070709

APPLICANT: Avance Group IV, L.L.C.
 PROJECT #: 97-106870 CP
 TAX ACCT #: 172705-3-011-0006

SITE PLAN:

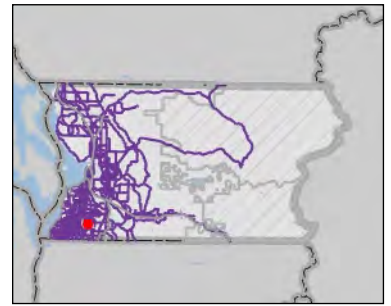
2 of 2



9808070709



Many sites are impacted by critical areas/streams, would require a difficult assemblage, etc. Some properties affected by recorded CASPs.



Legend

- Critical Area Site Plans
- Snohomish County Tax Parcels
- County Boundary
- Municipal Urban Growth Boundar
- Tulalip Indian Reservation Boundary
- Stillaguamish Indian Reservation Boundary
- County Parks
- National Forest Lands
- Washington Counties
- Municipal Annexations
- All Fish Distributions
- Snohomish County Streams**
- Shorelines of Statewide Significance
- Shorelines of the State
- Fish Habitat
- Non-fish Habitat Perennial
- Non-fish Habitat Seasonal
- Unknown, Untyped
- Snohomish County Water Bodies**
- Shorelines of Statewide Significance
- Shorelines of the State
- Fish Habitat
- Non-fish Habitat Perennial
- Non-fish Habitat Seasonal
- Unknown, Untyped
- National Wetland Inventory**
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other

1:2,977



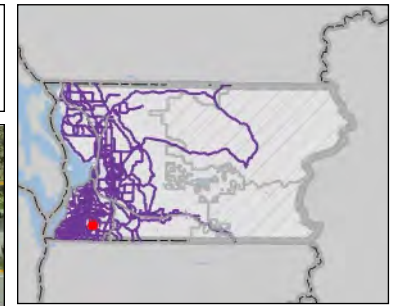
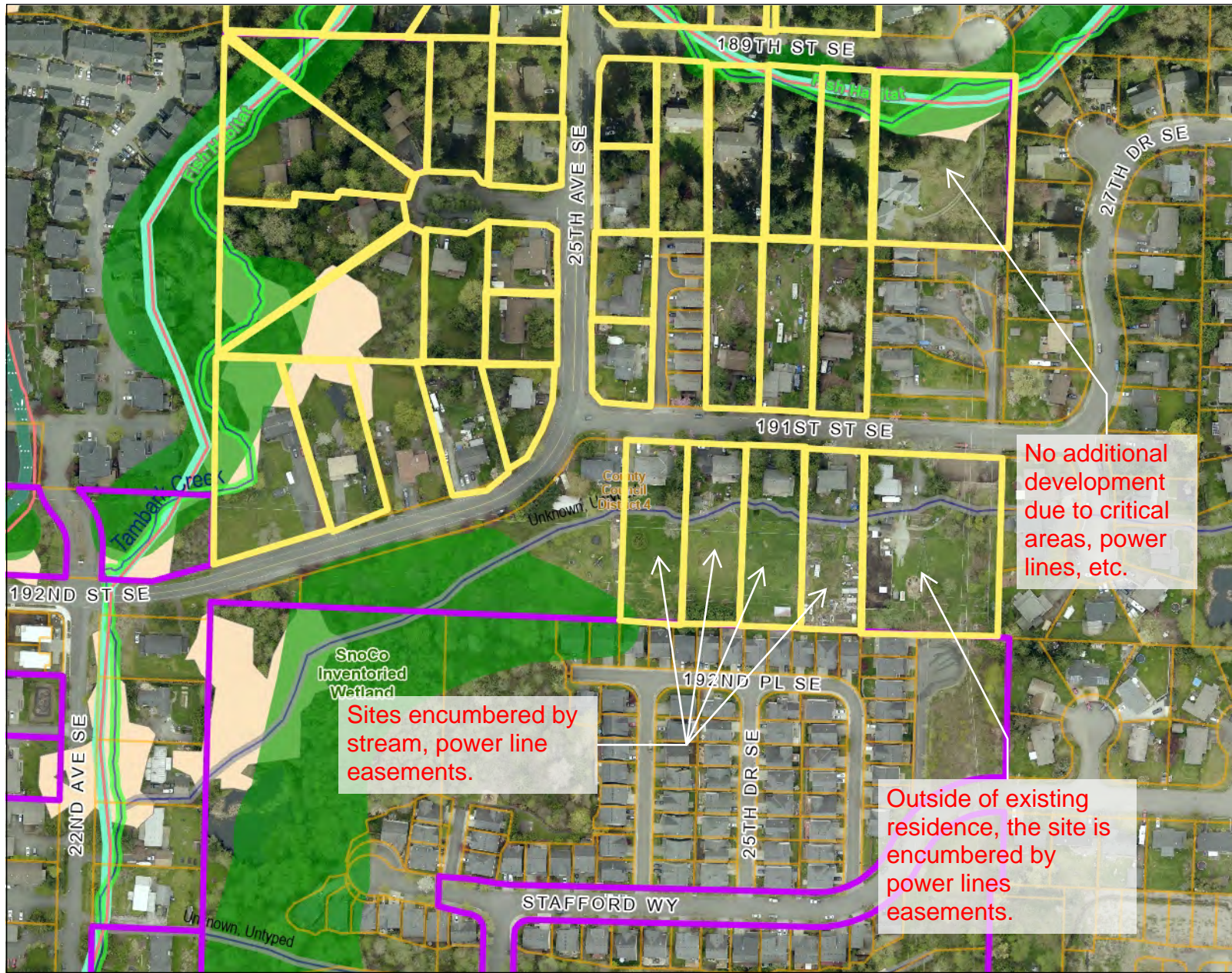
496.2 0 248.10 496.2 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

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Notes

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Legend

- Critical Area Site Plans
- Snohomish County Tax Parcels
- County Boundary
- Municipal Urban Growth Boundar
- Tulalip Indian Reservation Boundary
- Stillaguamish Indian Reservation Boundary
- County Parks
- National Forest Lands
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- Non-fish Habitat Seasonal
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- National Wetland Inventory**
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other

No additional development due to critical areas, power lines, etc.

Sites encumbered by stream, power line easements.

Outside of existing residence, the site is encumbered by power lines easements.

1:2,977



496.2 0 248.10 496.2 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

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Notes

This map was automatically generated using Geocortex Essentials.

Return Address: Seattle Custom Decks
23205 81st PI W
Edmonds, WA 98026



08/28/2002 11:08 AM Snohomish
P.0002 RECORDED County

200208280220

CRITICAL AREAS SITE PLAN

Project #: 02-106677-RK	Applicant: Seattle Custom Decks
Site Address: 2512 187th PI SE	Bothell, WA 98012
Tax Acct. #: 006686-000-041-00	
Critical Area Sq. Ft. : 4,700	Buffer Sq. Ft. 2,125

ZONE R-9600

FRONT SETBACK 20' from P/L along 187th PI SE R/W

SIDE SETBACK 5' & 5'

REAR SETBACK 5'

BUILDING HEIGHT 25' CORNER LOT REQUIRES FRONT SETBACK FROM BOTH STREETS

REFERENCE NUMBER(S) OF RELATED DOCUMENTS N/A 1 OF 2

GRANTOR(S) (OWNERS OF PROPERTY)

St Elizabeth Ann Seton Parish

LAST NAME FIRST NAME MI

GRANTEE(S) SAME AS ABOVE

Legal Description:

TAMBARK TRAILS DIV NO. 6 BLK 000 D-00 - LOT 41 SUBJ TO ESE PUD 1 & GEN TEL REG 00377-334 EX ST OF WA

Additional legal description is on page _____ of document

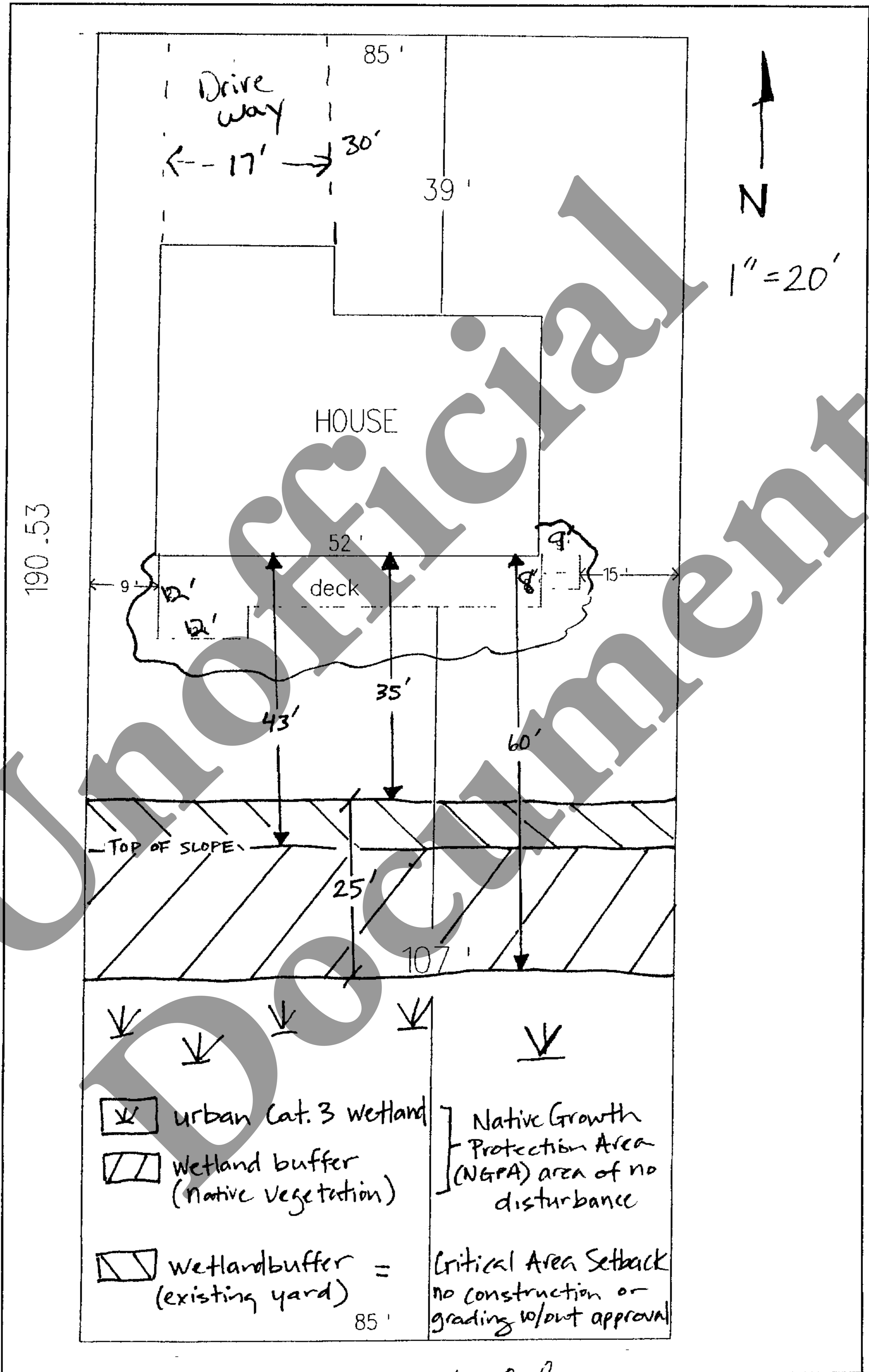
NATIVE GROWTH PROTECTION AREA is to be left permanently undisturbed in a substantially natural state No clearing, grading, filling, building construction or placement, or road construction of any kind shall occur, except removal of hazardous trees The activities as set forth in SCC 32.10 110(29) a, c, d, are allowed when approved by the County

Representations on this site plan may be approximations only and should not be used for purposes other than for determining general locations of critical areas Development activities beyond the scope of this plan may require additional studies and approvals

APPLICANT. Seattle Custom Decks
 PROJECT #. 02-106677-RK
 TAX ACCT#. 006686-000-041-00

SITE PLAN:

2 OF 2

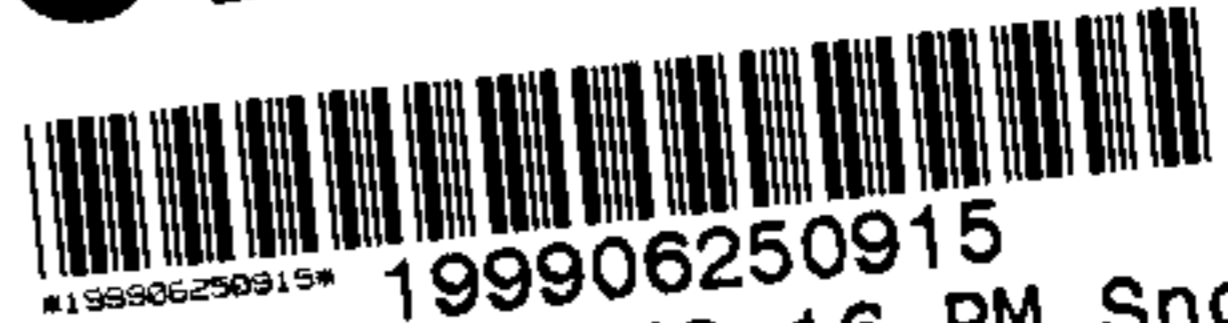


June Sato 8/21/02 Neil Troy 8/28/02
 APPROVED SNO CO PDS DATE APPLICANT DATE

200208280220

COPY

Return Address: Todd Larsen
3325 158th St SW
Lynnwood, WA 98037



06/25/1999 03:16 PM Snohomish County
P.0002 RECORDED

199906250915

CRITICAL AREAS SITE PLAN

Project # 99-102715-RK Applicant Todd Larsen
Site Address 2614 189th St SE Bothell, WA 98012
Tax Acct # 5949-000-012-0009
Critical Area Sq. Ft. : 19,960 Buffer Sq. Ft. 15,838

ZONE R 9600
FRONT SETBACK 20' From pl along Co Rd Rlw, Subj to NCPA
SIDE SETBACK 5' Subject to Powerline Esmt (E)
REAR SETBACK 5'
BUILDING HEIGHT 25' CORNER LOT REQUIRES FRONT SETBACK FROM BOTH STREETS

REFERENCE NUMBER(S) OF RELATED DOCUMENTS 1 OF 2

GRANTOR(S) (OWNERS OF PROPERTY)
LARSEN TODD C
LAST NAME FIRST NAME MI

GRANTEE(S) SAME AS ABOVE

Legal Description:
TAMBARK TRAILS BIK 000 D-00
lot 12 suby ESE to PUD#1

Additional legal description is on page _____ of document

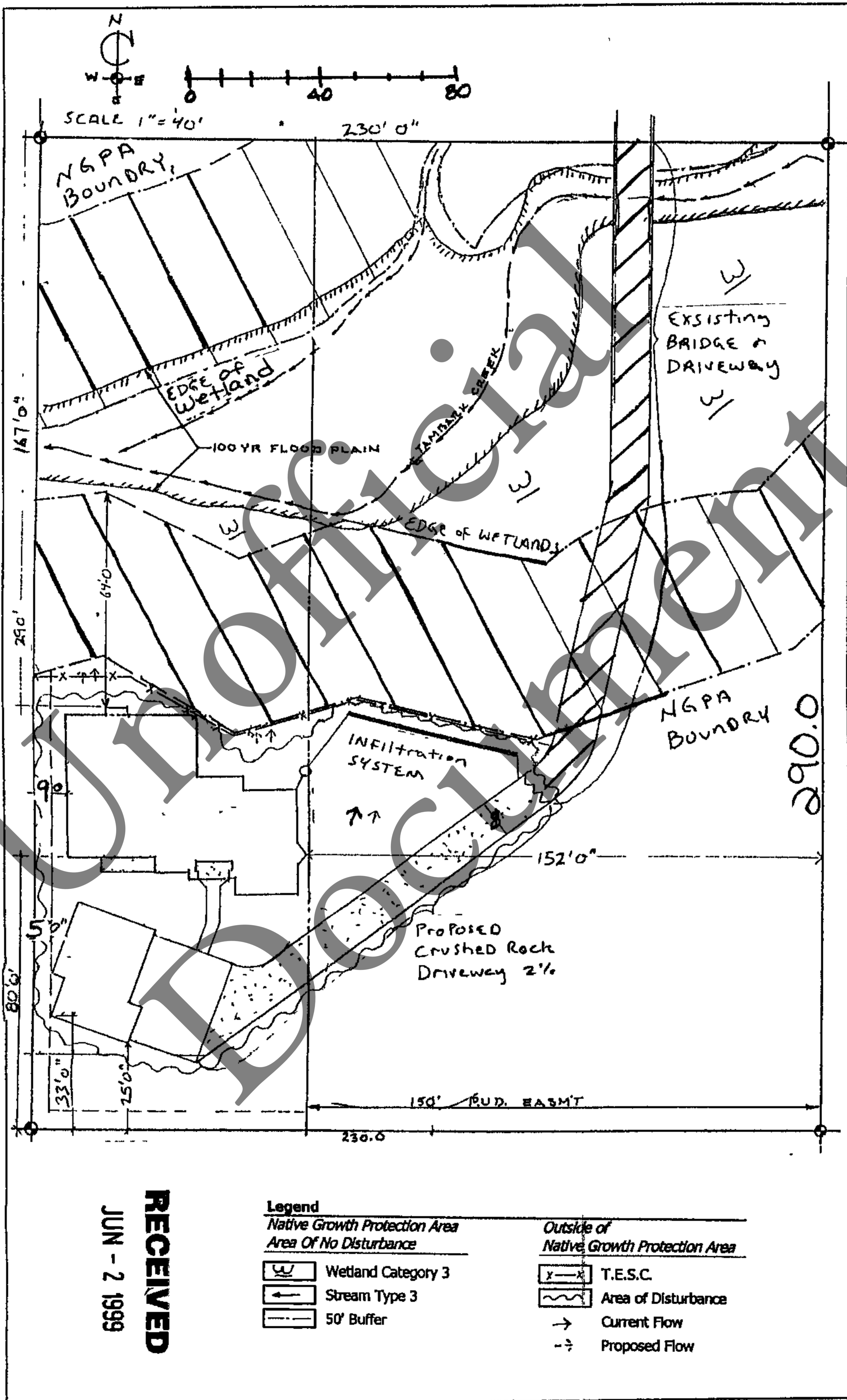
NATIVE GROWTH PROTECTION AREA is to be left permanently undisturbed in a substantially natural state No clearing, grading, filling, building construction or placement, or road construction of any kind shall occur, except removal of hazardous trees The activities as set forth in SCC 32 10 110(29) a, c, d, are allowed when approved by the County

Representations on this site plan may be approximations only and should not be used for purposes other than for determining general locations of critical areas Development activities beyond the scope of this plan may require additional studies and approvals

APPLICANT: Todd Larsen
 PROJECT #: 99-102715-RK
 TAX ACCT#. 5949-000-012-0009

SITE PLAN:

2 OF 2



RECEIVED
 JUN - 2 1999

Legend	
	Native Growth Protection Area Area Of No Disturbance
	Wetland Category 3
	Stream Type 3
	50' Buffer
	Outside of Native Growth Protection Area
	T.E.S.C.
	Area of Disturbance
	Current Flow
	Proposed Flow

D.L. [Signature] 06/29/99
 APPROVED SNO CO PDS DATE APPLICANT DATE

199906250915

Return Address: Erik & Martha Cheesbrough
2313 190TH ST SE BOTHELL, WA 98012



201702280232 2 PGS
02/28/2017 9:52am \$74.00
SNOHOMISH COUNTY, WASHINGTON

CRITICAL AREAS SITE PLAN

Project # 17 100830 AB
Applicant Erik & Martha Cheesbrough
Site Address 2313 190TH ST SE, BOTHELL, WA 98012-6905
Tax Acct # 006543-000-012-00
Critical Area Sq. Ft. : 220 Buffer Sq. Ft. : 23,240

ZONE

FRONT SETBACK 15 ft for living space and 18 ft for any parking structure

SIDE SETBACK 5ft and 5ft

REAR SETBACK Subject to CAPA/CASP for Tambark Creek

BUILDING HEIGHT CORNER LOT REQUIRES FRONT SETBACK FROM BOTH STREETS

REFERENCE NUMBER(S) OF RELATED DOCUMENTS 1 OF 2

GRANTOR(S) (OWNERS OF PROPERTY)

Cheesbrough

LAST NAME

Erik & Martha

FIRST NAME

MI

GRANTEE(S) SAME AS ABOVE

Legal Description:

TAMBARK TRAILS DIV. NO. 2 BLK 000 D-00 - LOT 12 SUBJ TO ESE PUD & GEN TEL

Additional legal description is on page _____ of document

In consideration of Snohomish County Code requirements, except as otherwise provided herein, the CAPA (Critical Area Protection Area) shall be left permanently undisturbed in a substantially natural state. No clearing, grading, filling, building construction, or placement, or road construction of any kind shall occur within said CAPA, except the allowed activities set forth in Snohomish County Code (30.62A.010(2), 30.62A.510, 30.62A.530) when approved by the County.

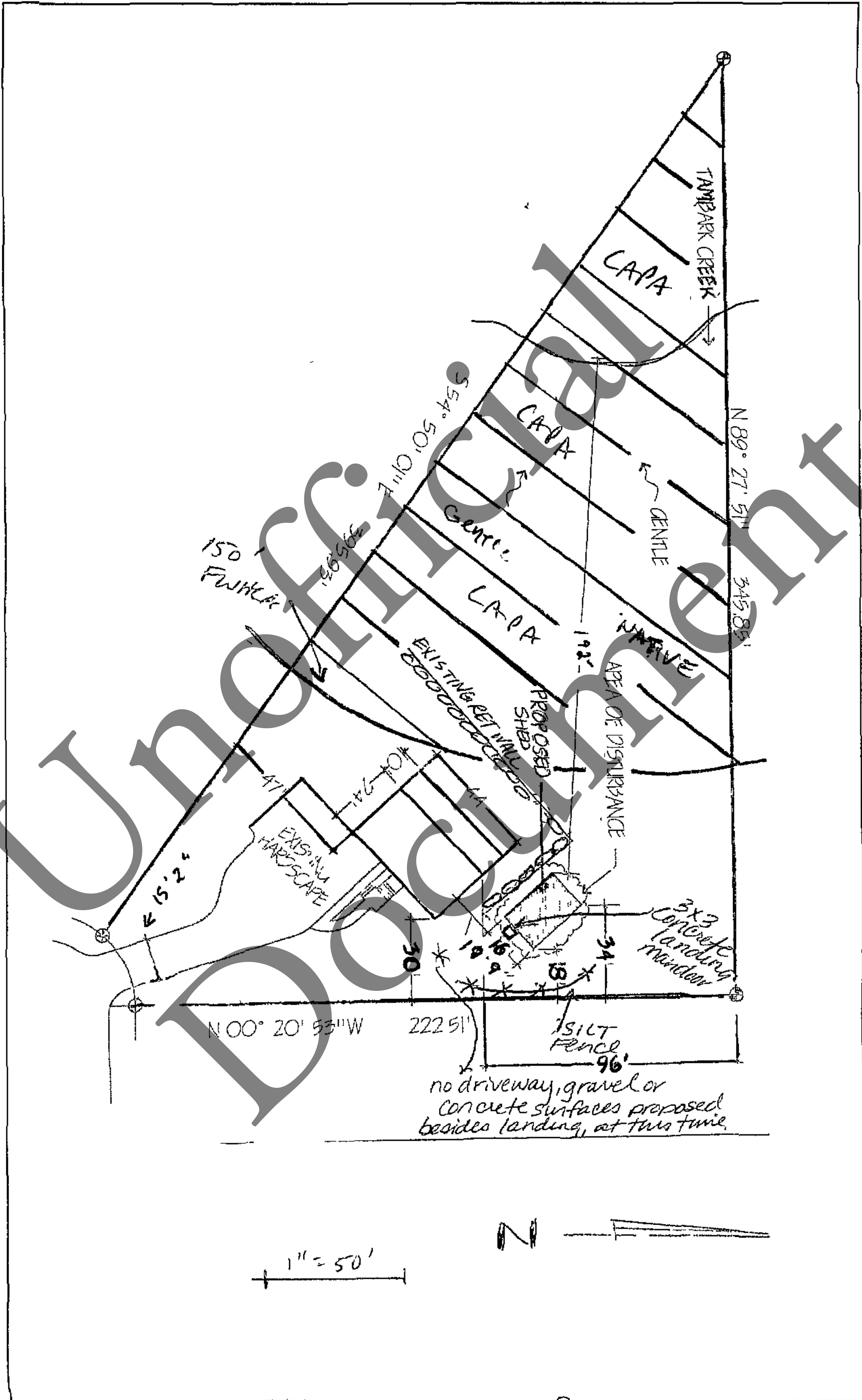
Representations on this site plan may be approximations only and should not be used for purposes other than for determining general locations of critical areas. Development activities beyond the scope of this plan may require additional studies and approvals.

The lot owner(s) shall be responsible for operating, maintaining, repairing and restoring the condition of the CAPA if any unauthorized disturbance occurs.

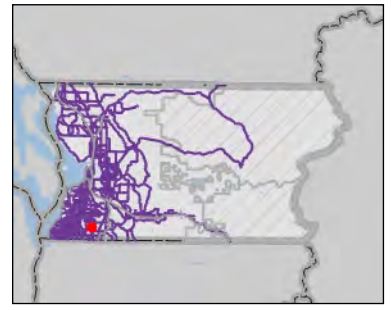
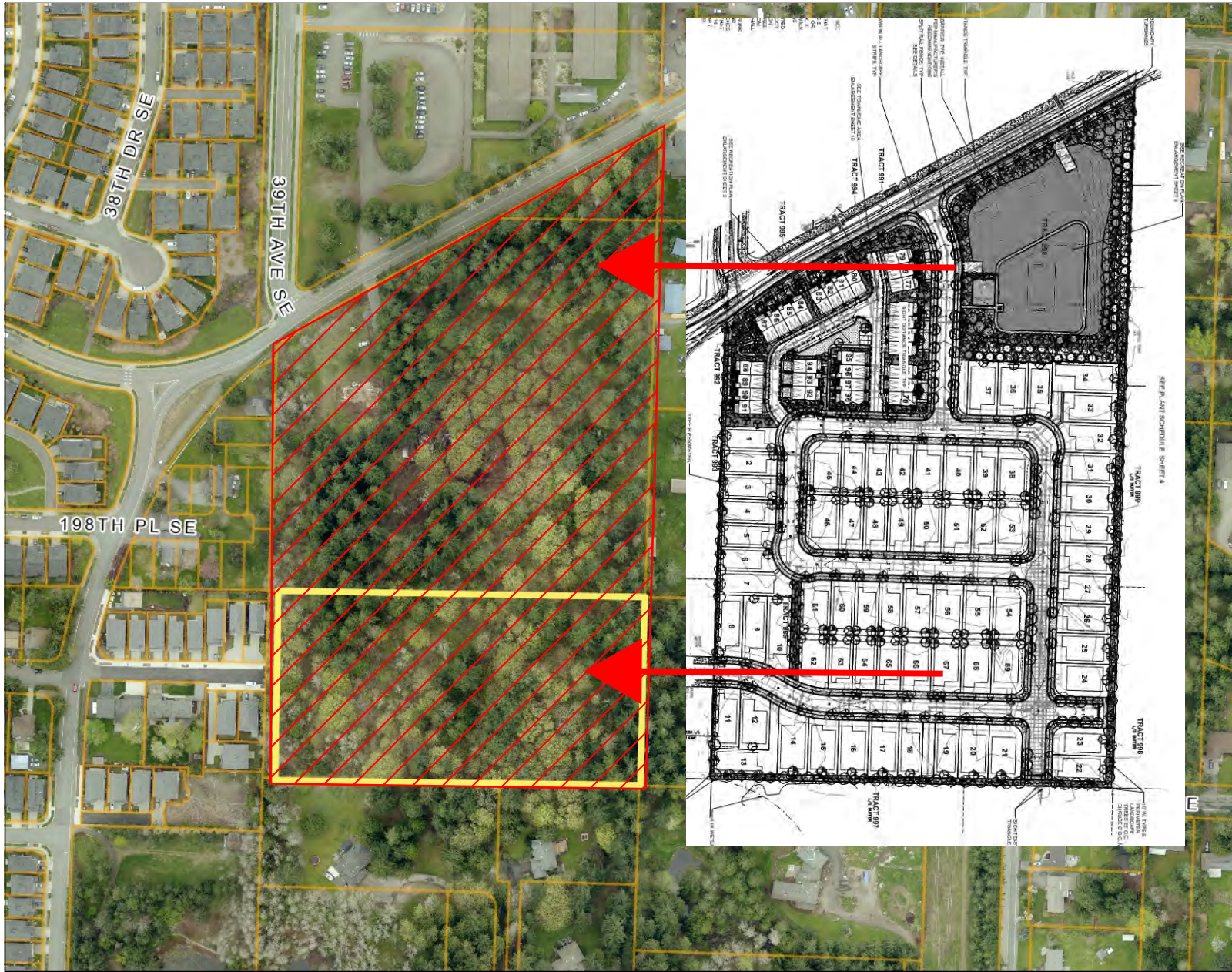
APPLICANT Erik & Martha Cheesbrough
PROJECT # 17 100830 AB
TAX ACCT# 006543-000-012-00

SITE PLAN

2 OF 2



[Signature] 2/28/17 *[Signature]* 2/28/17
APPROVED SNO CO PDS DATE APPLICANT DATE



Legend

Snohomish County Tax Parcels

1:3,145



524.2 0 262.10 524.2 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

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Notes

This map was automatically generated using Geocortex Essentials.

SEE PLANT SCHEDULE SHEET 4

TRACT 999
L/S BUFFER

TRACT 998
L/S BUFFER

12" W/ TYPE B
PERIMETER
LANDSCAPE
TREES 25' O.C.
SHRUBS 8' O.C.

SIGHT DIST
TRIANGLE

TRACT 997
L/S BUFFER

11/2" W/ TYPE B

TYPE B PERIMETER

SEE RECREATION PLAN
ENLARGEMENT SHEET 1

TRACT 990

TRACT 991

SEE TOWNHOME AREA
ENLARGEMENT SHEET 10

TRACT 994

TRACT 995

SEE RECREATION PLAN
ENLARGEMENT SHEET 9

TRACT 992

TRACT 993

TRACT 996

BOUNDARY
TURBIDANCE

SPACE TRIANGLE TYP

BARRIER TYP: METALL
REF: MANUFACTURE'S
RECOMMENDATIONS
SPLIT RAIL FENCE TYP
SEE DETAILS

AWN IN ALL LANDSCAPE
STRIPS TYP

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Hickey, Lisa

From: David Toyer <david@toyerstrategic.com>
Sent: Monday, August 19, 2024 1:06 PM
To: Contact Council
Cc: Lonnie Davis; Susan Davis
Subject: MON2 Support Letter - August 19th Comp Plan Hearing
Attachments: MON2 Support Letter TSA + Exhibits 08_19_24.pdf

Dear Council –

Our is the land use consultant representing the MON2 Davis/Johnson UGA expansion – a minor expansion of 22 acres in Monroe. Attached please find a letter in support of this proposal. We look forward to the opportunity to address this further at your hearing tonight.

Sincerely,

DAVID K. TOYER, PRESIDENT
TOYER STRATEGIC ADVISORS, INC.
3705 COLBY AVE, STE 1, EVERETT, WA 98201
425-344-1523
toyerstrategic.com

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August 19, 2024

County Council
Snohomish County
3000 Rockefeller Ave
Everett, WA 98201

IN SUPPORT OF MON2 DAVIS/JOHNSON UGA EXPANSION

Dear Council:

Our firm represents Lonnie and Susan Davis, who along with Jonathon and Seth Johnson, are the owners, applicants, and proponents (the “Applicants”) of what’s known as the MON2 Davis/Johnson proposal, consisting of a minor twenty-two (22) acre urban growth area (UGA) expansion in Monroe. This proposed expansion would only add population capacity for 179 people at a time when the State of Washington is experiencing a severe housing crisis as the result of chronic underbuilding over a decade in the making. The expansion provides for urban development in a location that is surrounded by existing low density sprawl. The subject expansion site can be conveniently and efficiently served by utilities.

We believe strongly that the County has the authority to make minor expansions to UGAs and that this proposed expansion (in concert with proposed actions to increase density within the existing UGA), helps fulfill the County’s requirements under GMA, the Regional Growth Strategy and the countywide planning policies to have sufficient capacity to accommodate future growth.

We are confident that the County must approve some minor UGA expansions to make sufficient developable lands immediately available to begin to overcome the broad and systemic housing deficit that has become a crisis while providing the regulatory framework (zoning, development standards, etc.) for higher intensity development and redevelopment that will fulfill the longer-term 20-year projected housing needs.

ABOUT THE MON2 LOCATION

Davis/Johnson proposes a minor 22-acre expansion along the northern boundary of the Monroe UGA and abutting 197th Ave SE and Chain Lake Road. The immediate urban areas adjacent to the Davis/Johnson property have been fully developed in recent years to meet the incredible demand for housing in Monroe. As pointed out within several letters and exhibits submitted by the Applicants during this lengthy process to update the comprehensive plan, the Monroe UGA has been built out quickly and very little land remains to meet future demands for housing.

Except for ±0.43 acres of Parcel 28062500407700¹ (see Parcel B on Exhibit A, attached) that is already in the existing UGA boundary, the Davis/Johnson property is zoned R-5 zone and has a minimum lot size of 200,000 square feet (4.59 acres).

The MON2 Davis/Johnson property shares approximately 50% of its boundary with the existing Monroe UGA and 60% of its boundary touches the city limits,² including UGA boundary along its eastern frontage on Chain Lake Road (a minor urban arterial) and 197th Ave SE (a local road built to urban standards). The Davis/Johnson site is bordered to the north by pre-GMA rural development³ in the R-5 zone that consists of substandard lots (to existing minimum lot sizes) at

¹ Combined the four Davis/Johnson Parcels total ±22.31 acres, but a ±0.43-acre portion of Parcel 28062500407700 (Parcel B in Map 1) is already located within the existing UGA boundary.

² The Applicants previously submitted information to the record showing the property shares 60% of its boundary with the existing city limits, which it does. That said, a portion of Parcel B in Exhibit A (attached) is already within the Monroe UGA. Thus, approximately 50% of the expansion area borders the existing UGA boundary.

³ In looking through property records, assessor maps, and cadastral annotations, the subdivisions and short subdivisions surrounding the Davis/Johnson property existed or were applied for prior to the County’s implementation of GMA. Only a single 3-lot rural cluster short-subdivision (“Collins Short Plat”) was identified as having been submitted and approved post-GMA implementation.

sprawling, suburban style low densities with lot sizes ranging from 0.57 acres to 1.49 acres. This results in the Davis/Johnson site being sandwiched between urban and suburban development patterns, receiving impacts from both.

LAND USE ANALYSIS

We performed an analysis of the 'rural' land uses in the area surrounding the MON2 Davis/Johnson site, evaluating ± 219 acres. A map of the analysis area and our findings is attached hereto as Exhibit B. Our analysis found:

- Despite the area's R-5 zoning and minimum lot size of 200,000 square feet (4.59 acres), only 8 out of 135 (6%) lots⁴ meet the minimum lot size (this includes 4 of the Davis/Johnson parcels).
- Looking exclusively at the 131 'rural' lots that immediately surround the Davis/Johnson site
 - Only 3% meet the minimum lot size requirement for the R-5 zone
 - 48% of the lots are 1 acre or less in size
 - The average lot size is 1.32 acres
 - The median lot size is 0.97 acres
- The area surrounding the Davis/Johnson property is not "rural" in nature. Instead, it consists of sprawling, low density suburban style development that is emblematic of pre-GMA development patterns which is apropos given the area (except for a single short plat) was almost entirely developed pre-GMA.
- If the Davis/Johnson site were not included as a minor UGA expansion, the analysis of development scenarios for this site demonstrate that the County would be greenlighting the exact type of sprawling, low density development GMA seeks to avoid.

DEVELOPMENT SCENARIOS

The following describes three potential development scenarios (2 rural, 1 urban) for the Davis/Johnson site depending on whether it is included in the UGA or not.

- 1) Rural Scenario 1. An evaluation of the site identified that 2 of the 4 Davis/Johnson parcels have existing single family homes (only one of which is habitable). One of those is on an 8.05-acre parcel while the other is on a 4.59-acre parcel. In accordance with SCC 30.28.010(3)(a), the larger of these parcels could add a detached accessory dwelling unit (DADU) while the smaller parcel could add an attached accessory dwelling unit (AADU). The two remaining vacant parcels consist of a 5.05-acre parcel and a 4.59-acre parcel. Again, according to SCC 30.28.010(3)(a), the larger parcel could be developed with a single family home and a DADU, while the smaller parcel could be developed with a single family home and an AADU. The as-is future rural development condition of the Davis/Johnson property would be the addition of 6 new housing units (2 single family homes and 4 accessory dwelling units).
- 2) Rural Scenario 2. Alternatively, the Davis/Johnson parcels could be developed as a rural cluster subdivision, which would allow them to add at least 5 single family homes – each of which would be able to have an attached accessory dwelling unit. This would generate an additional ten dwelling units in the rural area.
- 3) Urban Scenario 1. The Davis/Johnson site could be included in the UGA with a minor expansion, resulting in urban development of single family housing that would support 179 more people. This **is not** a conversion of vacant, undeveloped land into sprawling, low density development, but rather a measure to avoid that exact outcome by ensuring it is developed consistent with the adjacent urban development pattern (not the pre-GMA sprawling development pattern).

Based on the analysis above, we conclude:

- ✓ ***A minor UGA expansion*** that includes the Davis/Johnson property within the UGA ***will not*** contribute to rural sprawl because it would include the Davis/Johnson property in the UGA, support future development at urban densities,

⁴ We did not count stormwater or open space tracts as lots for purposes of this analysis.

and be served by existing, adjacent urban services and utilities.

- ✓ ***If the Davis/Johnson property is not added to the UGA***, its proximity to the UGA along with current and future development pressures will result in maximum development of the site in the rural area. ***This will worsen the County's ability to reign in its future % of rural population growth to be consistent with the region's growth strategy.***
- ✓ ***Leaving the Davis/Johnson property outside of the UGA would directly contribute to the property developing into sprawling, low density development*** like the rest of the rural area that surrounds it.

PUTTING THE STAFF RECOMMENDATION IN CONTEXT

The staff report and recommendation for MON2 Davis/Johnson expansion dated September 11, 2023, is a duplicate of the analysis completed at the time the proposal was initially reviewed against the docketing criteria in SCC 30.74.030. The problem with this is that the staff's analysis ***was conducted before any substantive analysis***. Unfortunately, some of this analysis was copied into the DEIS (which we address in a latter section of this letter).

The result of the repeat reuse of the initial review is that recommendation did not consider all the information gathered throughout this process, nor did it reevaluate the proposal against the criteria in Countywide Planning Policy (CPP) DP-2 based on the fact MON2 was included in the docket, which makes different conditions in DP-2 applicable.

We strongly advise Council and the public to avoid giving Staff's recommendation substantial weight or deference when reaching a final decision. Ultimately, the Council must fully evaluate whether this expansion meets the requirements of CPP DP-2 and the GMA.

We offer the following analysis of the MON2 Davis/Johnson expansion, which analyzes the proposal for compliance with CPP DP-2 and for consistency with the GMA and the multicounty planning policies (MPPs).

COMPLIANCE WITH CPP DP-2

DP-2 is the sole CPP addressing the conditions required in reaching the decision to expand an individual UGA. The following analyzes the MON2 Davis/Johnson proposal's compliance with the policy. The policy language is shown in *italics* while our analysis of its applicability to the proposal is shown in [blue text](#).

DP-2 An expansion of the boundary of an individual Urban Growth Area (UGA) that results in a net increase of residential, commercial or industrial land capacity shall not be permitted unless:

[We point out that the MON2 Davis/Johnson proposal is a minor UGA expansion that would add approximately 22 acres to the Monroe UGA. The following analysis shows the expansion is permitted in accordance with DP-2\(a\), which satisfies the above requirement.](#)

a. The expansion is supported by a land capacity analysis adopted by the County Council pursuant to RCW 36.70A.110;

[The "land capacity analysis" referenced is not the same document as the buildable lands report \(BLR\) which looks backwards at how well \(or not well\) urban densities were achieved.⁵ In contrast, a land capacity analysis is prospective \(forward looking\) and is prepared in conjunction with the comprehensive plan update as the means of tabulating the future development capacity that will be available based on the planning decisions the County Council makes during a comprehensive plan update, which decisions include rezones, changes to development standards to increase densities, and UGA expansions.](#)

[For a proposal like MON2 Davis/Johnson to be consistent with DP-2\(a\), it must be supported by a land capacity analysis showing that the expansion plus all other changes will not exceed the 15% excess capacity threshold in DP-2\(b\) below for the individual UGA. That said, the land capacity analysis for this plan is completed, a plan adopted, and then a \[final\]\(#\)](#)

⁵ This distinction is made clear in *Friends of Skagit County, et al v. Skagit County*, GMHB No. 07-2-0025c, Order on Reconsideration (June 18, 2008) at 16. In that matter the Board found, "The BLR is retrospective - looking back over the past five years of development to see how well the county and its cities have performed. The information developed through the BLR provides important information for updating and, perhaps, revising a County's Land Capacity Analysis." The Board added, "... in contrast to the Buildable Lands Report, the LCA is prospective - looking forward over the coming 20 years to see if there is enough land within the UGA to accommodate the growth that has been allocated to the area."

population target (which can be different than the “Initial” population target) is adopted. The result of this process is that decisions to make minor UGA expansions such as this are supported by the land capacity analysis and made part of the capacity projected for the 20-year period.

Assuming MON2 is directed by the Council to be included in the final land capacity analysis, **THIS CONDITION IS MET.**

b. The resulting total additional population capacity within the Snohomish County composite UGA as documented by both City and County comprehensive plans does not exceed the total 20-year forecasted UGA population growth by more than 15 percent;

The “composite” UGA is the cumulative total of the city and county comprehensive plans for a UGA. Ultimately, any UGA expansion or expansions completed during ten-year comprehensive plan updates (like the present update) can’t actually be found to exceed the 20-year forecasted UGA population by more than 15% because the current process is what ultimately establishes what the 20-year forecasted UGA population will be. In other words, if the MON2 Davis/Johnson expansion were approved, it would be counted within the 20-year forecasted UGA population during the final reconciliation⁶ process as provided for in the CPPs.

The “excess capacity” criterion only applies to expansions considered outside the periodic update in annual dockets. The purpose is limiting expansions between comprehensive plan updates when the expansions not be necessary in situations where growth may be backloaded in the planning period.

Again, the current process cannot result in the County exceeding its the 20-year forecasted population growth unless it were to result in the County adopting a final population allocation that exceeded the high end of the OFM forecast. Because the County’s process reconciles and balances the ledger for the next 20 years, the MON2 Davis/Johnson would not exceed the 20-year forecast and **THIS CONDITION IS MET.**

c. The expansion otherwise complies with the Growth Management Act;

GMA has several requirements guiding the establishment and adjustment of UGAs. First, RCW 36.70A.115(1) dictates that comprehensive plans and development regulations must provide sufficient land capacity to accommodate the 20-year growth target, specifically:

Counties . . . shall ensure that, taken collectively, adoption of and amendments to their comprehensive plans and/or development regulations provide sufficient capacity of land suitable for development within their jurisdiction to accommodate their allocated housing and employment growth. . . as adopted in the applicable countywide planning policies and consistent with the twenty-year population forecast from the office of financial management.

Separately, GMA at RCW 36.70A.215(1)(b) requires the county to “*identify reasonable measures, other than adjusting urban growth areas, that will be taken to comply with the requirements of this chapter.*” Simultaneously, RCW 36.70A.215(3)(a) acknowledges that “. . . *zoned capacity of land alone is not a sufficient standard to deem land suitable for development* or redevelopment *within the twenty-year planning period.*” Ultimately, the requirements in RCW 36.70A.215 do not preclude UGA expansions but require counties to thoughtfully contemplate a range of actions that can be taken before approving UGA expansions.

We point to the following as evidence that the County has considered and employed a range of actions (reasonable measures) prior to making its decision to adjust UGA boundaries. This includes, but is not limited to:

- ✓ The recent adoption of four recent ordinances⁷ encouraging more flexible infill development and higher densities
- ✓ The creation of the new Mixed Use Corridor zone along future link rail extensions
- ✓ Area wide rezones that will be effected in several locations

⁶ For periodic comprehensive plan updates at the 10-year intervals, Snohomish County’s CPPs are set up to establish an “initial” population target before the planning updates begin (to generally inform the planning process). After that process unfolds, the county and its cities complete their plan updates, they tally the results and ‘reconcile’ the 20-year forecasted UGA population by establishing a “final” target.

⁷ Ordinance 24-058 amending lot size averaging; Ordinance 24-059 creating more flexibility for parking to encourage higher-density cottage housing; Ordinance 24-060 to reduce minimum lot sizes; and Ordinance 24-061 to allow more duplex development.

Ultimately, the County has maximum flexibility that is made clear in RCW 36.70A.3201, which states:

“Local comprehensive plans and development regulations require counties and cities to balance priorities and options for action in full consideration of local circumstances. The legislature finds that while this chapter requires local planning to take place within a framework of state goals and requirements, the ultimate burden and responsibility for planning, harmonizing the planning goals of this chapter, and implementing a county's or city's future rests with that community.”

We further call attention to *Thurston County v. W. Wash. Growth Mgmt. Hearings Bd.*ⁱ wherein the Washington Supreme Court ruled that “the GMA does not explicitly limit the size of a UGA. . .” Washington’s Supreme Court has further held that, “deference to county planning actions that are consistent with the goals and requirements of the GMA . . . cedes only when it is shown that a county’s planning action is in fact a ‘clearly erroneous’ application of the GMA.” See *Quadrant Corporation, et al., v. State of Washington Growth Management Hearings Board*, 154 Wn. 2d 224, 248, 110 P. 3d 1132 (2005).

To find that an action (like a minor expansion) is clearly erroneous, the Growth Management Hearings Board would need to review the entire record and be left with a definite and firm conviction that a mistake has been made. We are confident, given the whole body of evidence available, that the Hearings Board will not find a minor UGA expansion to be a clearly erroneous decision.

We especially note that Snohomish County and the entire state face a historic and urgent housing crisis that demands we cannot rely on how we’ve always forecasted and planned for population growth and development capacity if we are to ensure we have the actual development capacity to solve the current housing crisis **AND** ensure we have sufficient development capacity for the next 20-years.

The extent to which we’ve relied too heavily on reasonable measures versus minor UGA expansions, taking that same approach again and again will not achieve a different result. Snohomish County needs a broad, bold plan that ensures that it takes a diverse approach to providing for the development capacity to support the housing we already need plus the housing projected to be needed during the 20-year planning period.

Minor UGA expansions like the MON2 Davis/Johnson proposal must be part of that strategic approach. A decision by the County to expand UGAs, including MON2 Davis/Johnson 22-acres would comply with GMA as it is consistent with the deference and local authority granted the County by GMA in RCW 36.70A.3201.

d. Any UGA expansion should have the support of affected cities. Prior to issuing a decision on a UGA boundary change, the County shall consult with affected cities and give substantial weight to a city's position on the matter. If the County Council approves an expansion or contraction of a UGA boundary that is not supported by an affected city, it shall include in its findings how the public interest is served by the UGA expansion or contraction despite the objection of an affected city; and

This policy encourages the County to have the support of the local municipality whose UGA will be expanded. We note that there are multiple letters in the record from the City of Monroe and individual Councilmembers expressing support for the MON2 proposal. **THIS CONDITION IS MET.**

We note that other community support letters are in the record, including from the Monroe School District Administrator, area residents, and a local housing advocate.

e. One of the following conditions is met:

This establishes that **ONLY ONE of the following eleven conditions⁸ be met** (not all of them).

1. *The expansion is a result of the most recent buildable lands review and evaluation required by RCW 36.70A.215 and performed per policy GF-7 following the procedures in Appendix E. Not applicable to MON2, as this covers only those proposals that are considered during annual docketing.*

⁸ It should be noted that some conditions have parts and/or sub-conditions.

2. *The expansion is a result of the review of UGAs at least every eight years to accommodate the succeeding twenty years of projected growth, as projected by the State Office of Financial Management, and adopted by the County as the 20-year urban allocated population projection as required by RCW 36.70A.130(3). Applicable.*

Although this still references 8-year updates (state law has returned to a 10-year requirement), this condition applies because the County is presently completing the update to its comprehensive plan that establishes the new 20-year population allocation. The MON 2 expansion (even when adopted with other proposals under consideration) would be consistent with the County's adoption of a final 20-year population allocation because it falls within the range of growth OFM forecasts and it would be substantially consistent with the allocation of population under the Regional Growth Strategy.

The County has studied the MON2 expansion within its three alternatives and its inclusion in the adopted comprehensive plan update would be the result of the Council deciding that additional land is needed in the Monroe UGA to accommodate the 20-year population target selected for this area. This final target will be incorporated into the reconciliation process to establish the final population targets in the CPPs. **THIS CONDITION IS MET.**

3. *Both of the following conditions are met for expansion of the boundary of an individual UGA to include additional residential land: This is not applicable to MON2 as DP-2-e-2 is already met. It should be noted that this condition is meant to apply to expansions considered during annual amendment cycles, not periodic updates.*
 - a. *Population growth in the UGA (city plus unincorporated UGA) since the start of the twenty-year planning period, equals or exceeds fifty percent of the additional population capacity estimated for the UGA at the start of the planning period. Acceptable sources of documentation are the most recent Snohomish County Tomorrow (SCT) Growth Monitoring Report (GMR) or the buildable lands review and evaluation (Buildable Lands Report [BLR]), and Not applicable.*
 - b. *An updated residential land capacity analysis conducted by city and County staff for the UGA confirms the accuracy of the above finding using more recent residential capacity estimates and assumptions, and any new information presented at public hearings that confirms or revises the conclusions is considered. Not applicable*
4. *Both of the following conditions are met for expansion of the boundary of an individual UGA to include additional employment land: Not applicable.*
 - a. *Employment growth in the UGA (city plus unincorporated UGA) since the start of the twenty-year planning period, equals or exceeds fifty percent of the additional employment capacity in the UGA at the start of the planning period. Acceptable sources of documentation are the most recent SCT GMR or the buildable lands review and evaluation (BLR), and Not applicable.*
 - b. *An updated employment land capacity analysis conducted by city and County staff for the UGA confirms the accuracy of the above finding using more recent employment capacity estimates and assumptions. Not applicable.*
5. *The expansion will correct a demonstrated mapping error. Not applicable.*
6. *Schools (including public, private and parochial), places of worship, institutions and other community facilities that primarily serve urban populations within the urban growth area in locations where they will promote the local desired growth plans should be located in an urban growth area. In the event that it is demonstrated that no site within the UGA can reasonably or logically accommodate the proposed facilities, urban growth area expansions may take place to allow the development of these facilities provided that the expansion area is adjacent to an existing UGA. Not applicable.*
7. *In UGAs where the threshold in Condition 4 has not been reached, the boundary of an individual UGA may be expanded to include additional industrial land if the expansion is based on the criteria contained in RCW 36.70A.365 for the establishment of a major industrial development. This assessment shall be based on a*

collaborative County and city analysis of large developable industrial site needs in relation to land supply. “Large developable industrial sites” may include land considered vacant, redevelopable, and/or partially-used by the Buildable Lands Program (per GF7 and Appendix E of these CPPs) and may include one or more large parcels or several small parcels where consolidation is feasible. **Not applicable.**

8. The expansion will result in the realization of a significant public benefit as evidenced by Transfer of Development Rights (TDR) to the expansion area from Agriculture or Forest lands designated as TDR sending areas. The expansion area shall not be a designated forest or agricultural land of longterm significance. **Not applicable.**
9. The expansion will permanently preserve a substantial land area containing one or more significant natural or cultural feature(s) as open space adjacent to the revised UGA boundary and will provide separation between urban and rural areas. The presence of significant natural or cultural features shall be determined by the respective legislative bodies of the county and the city or cities immediately adjacent to the proposed expansion, and may include, but are not limited to, landforms, rivers, bodies of water, historic properties, archeological resources, unique wildlife habitat, and fish and wildlife conservation areas. **Not applicable.**
10. The expansion is a response to a declaration by the County Executive, or the County Council by resolution, of a critical shortage of affordable housing which is incurable in a timely manner by the implementation of reasonable measures or other instrumentality reasonably available to the jurisdiction, and the expansion is reasonably calculated to provide affordable housing. **Not applicable.**
11. The expansion will result in the economic development of lands that no longer satisfy the designation criteria for natural resource lands and the lands have been redesignated to an appropriate non-resource land use designation. Provided that expansions are supported by the majority of the affected cities and towns whose UGA or designated MUGA is being expanded and shall not create a significant increase in total employment capacity (as represented by permanent jobs) of an individual UGA, as reported in the most recent Snohomish County Tomorrow Growth Monitoring Report in the year of expansion. **Not applicable.**

CONSISTENCY WITH MULTICOUNTY PLANNING POLICIES (MPPs)

RCW 36.70A.210(7) requires two or more counties with a population of four-hundred fifty thousand or more and having contiguous boundaries to have MPPs that provide a framework for coordinating future growth. Locally, in the PSRC⁹ region’s MPPs are more widely known as Vision 2050. Vision 2050 **does not** prohibit the expansion of UGAs. That said, some who read Regional Growth Strategy (RGS) Policy at MPP-RGS-5 (below) argue that ‘stability’ and ‘sustainability’ are meant to exclusively apply to the size of the UGA boundary, inferring boundaries should not be changed.

*“Ensure long-term **stability** and **sustainability** of the urban growth areas consistent with the regional vision.”*

We argue this is too narrow of an interpretation that cannot be reconciled with the greater requirements of the counties and cities to balance all the requirements of GMA. Nor does it consider what cities and their UGAs need to be economically, socially, and operationally sustainable (among other objectives). To achieve real sustainability, UGAs may need minor expansions to account for higher-than-expected population growth, the needs of that area to reach certain population milestones so that it can attract commercial and industrial growth, etc. Moreover, sustainability involves more than drawing a line on the map, requiring recognition of jobs-to-housing balances; the economic dependency jurisdictions have on realizing development and redevelopment to increase taxable valuations (and property tax collections), generate sales and real estate tax revenues, levy charges for past investments in infrastructure improvements, etc.; and much more.

Ultimately, the RGS is permissive of minor expansions through the following statements:

- “any adjustments to the urban growth areas in the coming decades should continue to be minor.” – page 24
- “when adjustments to the urban growth area are considered it will be important to avoid encroaching on important habitat and natural resource areas” – page 24

⁹ King, Kitsap, Pierce & Snohomish counties

The MON2 Davis/Johnson expansion meets these conditions as it:

- 1) Is only 22 acres in size, adding a population of only 179.
- 2) Would not encroach on important habitat or natural resource areas.
- 3) Is proximate to and can be efficiently served by existing water, sewer, and other urban infrastructure.
- 4) Would meet existing housing needs more quickly than reliance upon developing complex infill sites.

As to any concern that the County's or City of Monroe's comprehensive plans would or would not be "certified" by PSRC so they can continue to qualify for federal transportation funding administered through PSRC, we point out that PSRC bases certification on substantial consistency, not exact adherence to the RGS.

*“ . . . plans need to demonstrate **substantial** consistency between the land use assumptions used throughout the plan and the adopted countywide planning growth targets.¹⁰”*

Ultimately, Vision 2050 and the RGS acknowledge that the process for adjusting UGAs is provided for in GMA, not the MPPs.

CLARIFYING THE RECORD

During the last couple of years as the comprehensive plan update has unfolded, the staff report, Draft Environmental Impact Statement (DEIS), and other documents in the record have either failed to accurately describe (or missed altogether) certain critical facts, including the availability of urban infrastructure to serve the MON2 Davis/Johnson expansion and the characterization of an adjacent stream. The following outlines key information that Council should consider.

UTILITIES & PUBLIC SERVICES

While the DEIS identifies what jurisdictions and agencies would provide utilities and public services to the MON2 expansion, it does not describe the proximity of these urban utilities and services to the site.

- **Sewer.** The final plat for Eaglemont Division VII, a 46-lot plat abutting the southern boundary of the MON2 Davis/Johnson property was recorded in January 2023. This plat extended an 8” sewer line from 134th ST SE to within 238’ feet of the MON 2 Davis/Johnson property at the closest point. Exhibit C (attached) contains the last two pages of the preliminary civil design for this plat and is attached hereto with the sewer line extension and its proximity to the site highlighted.

WE FIND: Sufficient capacity for sewer exists to serve development in the expansion area by the time of its occupancy and use.

- **Water.** The MON2 Davis/Johnson surrounds the existing City of Monroe water towers. Additionally, the site is transected by a 12” water line and fronts both 8” and 12” water lines running along 197th Ave SE and Chain Lake Road. Exhibit D (attached) shows the proximity of the site to multiple water lines, as well as sewer and stormwater systems.

WE FIND: Sufficient capacity for water exists to serve development in the expansion area by the time of its occupancy and use.

- **Schools.** The DEIS notes that the MON2 Davis/Johnson expansion plus another expansion being considered in Monroe would add a total of 34 students to the Monroe School District. However, it did not separate out the student generation for each or address how this relates to capacities in the current school district capital facility plan. Assuming that the MON2 proposal will generate approximately 76 single-family homes with an average household size of 2.35 (this equals the 179 population figure established by the county), this expansion would generate 8 K-5 students, 5 Grade 6-8 students and 6 Grade 9-12 students at full buildout based on current student generation rates.ⁱⁱ While the Monroe School District's Capital Facility Plan identifies a potential capacity

¹⁰ “PSRC Plan Review and Comprehensive Plans Frequently Asked Questions” the PSRC address Plan Review and Certification, Page 5 (December 2023)

shortfall of 53 students in elementary schools by 2027, the plan includes proposed permanent and temporary capacity improvements that would result in a net surplus capacity of 123 elementary students.

WE FIND: Sufficient capacity for students in the schools exist to serve development in the expansion area by the time of its occupancy and use.

- **Other Public Services.** In the DEIS, the county notes potential additional service requirements for the Sheriff's office and other public services that are not services provided by the city, but it fails to point out Monroe Municipal Code (MMC) 13.08.240 which states the city "will not extend sanitary sewer service or increase existing sewer capacity to properties located beyond the city limits unless and until such properties have been annexed to the city."

WE FIND: Because the City of Monroe requires annexation as a precondition to obtaining sewer service, public services provided by the county will not be affected by growth in the unincorporated UGA. In other words, this expansion will not increase demand for the Sheriff, for example.

TRANSPORTATION

The MON2 Davis/Johnson expansion was analyzed in the DEIS for potential impacts to transportation. That analysis shows it would not impact the level of service (LOS) standard of any local road segments or affect intersection delays. However, this analysis did identify that an arterial segment along US Highway 2 from 92nd Street SE to SR 522 (ID 205) currently operates at LOS F, which is below the adopted Rural LOS C. However, what it fails to mention is that this arterial is designated as a "Highway of Statewide Significance" and state law explicitly exempts highways of statewide significance (HSS) routes from local concurrency regulation. Thus, the failing LOS on this arterial segment does not affect the MON2 Davis/Johnson expansion.

WE FIND: Because US Highway 2 is exempt from local concurrency programs, the failing LOS should have no impact on the ability to consider the MON2 Davis/Johnson expansion.

CRITICAL HABITAT

The DEIS concluded that "No ESA-listed wildlife species or plants, other species of importance or other habitats of importance were identified within MON2," and there would be "no critical habitat impacted" by the MON2 Davis/Johnson expansion. However, the DEIS notes that it "would extend the UGA closer to a non-fish bearing stream." According to the National Wetlands Inventory, the stream in question is an R4SBC which means it is an intermittent streambed that is influenced by seasonal flooding.

The Applicants believe that county maps inaccurately show the stream as being closer to the proposed expansion area than it is, and that the DEIS fails to acknowledge that this was relocated at an unknown date to the north of the MON2 Davis/Johnson site to a culvert crossing near Chain Lake Road and 130th.

WE FIND: The MON2 Davis/Johnson expansion would have no impacts on critical habitat or species, and future development of this location would not interfere with a non-fish bearing creek.

PUTTING HOUSING NEEDS IN CONTEXT

We need housing in Washington of all types and prices – ownership and rental, single family and multifamily, etc. The Building Industry Association of Washington recently used Freddie Mac's methodology for identifying housing shortages, applying it on a county-by-county basis statewide. They identified a statewide shortage of over 250,000 housing units and a Snohomish County shortage of more than 25,000 housing units. We acknowledge that this analysis is different than Housing Needs Reports which try to look at both current shortages and likely future needs as part of local housing needs reports. We remain concerned that though the methodologies for Housing Needs Assessments are widely accepted, they may still fall short of ensuring sufficient housing inventory is created to address both the existing shortfall and the future housing needs.

To that end, we argue that Snohomish County must not only increase the zoned density within the existing UGAs *but also* make minor adjustments to expand UGAs if it desires to ensure that there will not only be there sufficient developable land available for the planning period, but that there is also sufficient developable land immediately available to more rapidly address the current shortfall.

THE IMPACTS FROM A LACK OF HOUSING

As you are aware, the lack of housing is impacting individuals and families by forcing them to be cost-burdened. It's also impacting infrastructure, as there is outward pressure for individuals and families to seek more affordable housing further from their employment. We believe it is also important to point out that housing shortages are impacting the State's overall competitiveness for economic development. We call attention to a 2022 Business Competitiveness Report for Washington Stateⁱⁱⁱ that was prepared for the Lt. Governor and the Joint Legislative Committee on Economic Development, which highlights include:

- Washington State has the fewest number of housing units per household of any state in the country, and the housing crisis is getting worse as the number of units built has not kept pace with household formation over the last decade.
 - *It further details that there are only 1.06 housing units per household in the state compared to 1.14 nationally, putting Washington at 190,000 housing units short of achieving the national average.*
- The lack of supply puts strong upward pressure on home prices and rents. 44% of Washington renter households are cost burdened and spend more than 30% of their income on housing; 22% of renters are severely cost burdened and spend more than 50% of their income on housing.
- Chronically undersupplied housing is the principal driver of the state's homelessness crisis. Washington's homelessness rate—30 per 10,000 residents—is well above the U.S. average (18 per 10,000 residents).
- Homeownership is becoming more unattainable, particularly for BIPOC households. The Black homeownership rate is 11.5% lower than the national average, which ranks last among peer states, and the 7th lowest nationally.
- Homeownership is becoming more unattainable, particularly for BIPOC households. The Black homeownership rate is 11.5% lower than the national average, which ranks last among peer states, and the 7th lowest nationally.

CONCLUSION

We strongly urge the County Council take action to approve the MON2 Davis/Johnson expansion as it will:

- Address critical housing needs
- Eliminate the potential for the subject properties to perpetuate a pattern of sprawling, low density development in the rural area
- Ensure thoughtful planning of the parcels in conjunction with the existing UGA
- Facilitate improvements to Chain Lake Road, including the extension of a multi-use pathway closer to Chain Lake Elementary School (to promote safe walking)
- Maximize the efficient use of existing urban utilities that are available to serve the subject site
- Support opportunities to use existing utility corridors to make urban trail connections

Should you have any questions, or require clarifications or additional information, please do not hesitate to contact me at 425-322-5226 or david@toyerstrategic.com.

Sincerely,



David Toyer
President

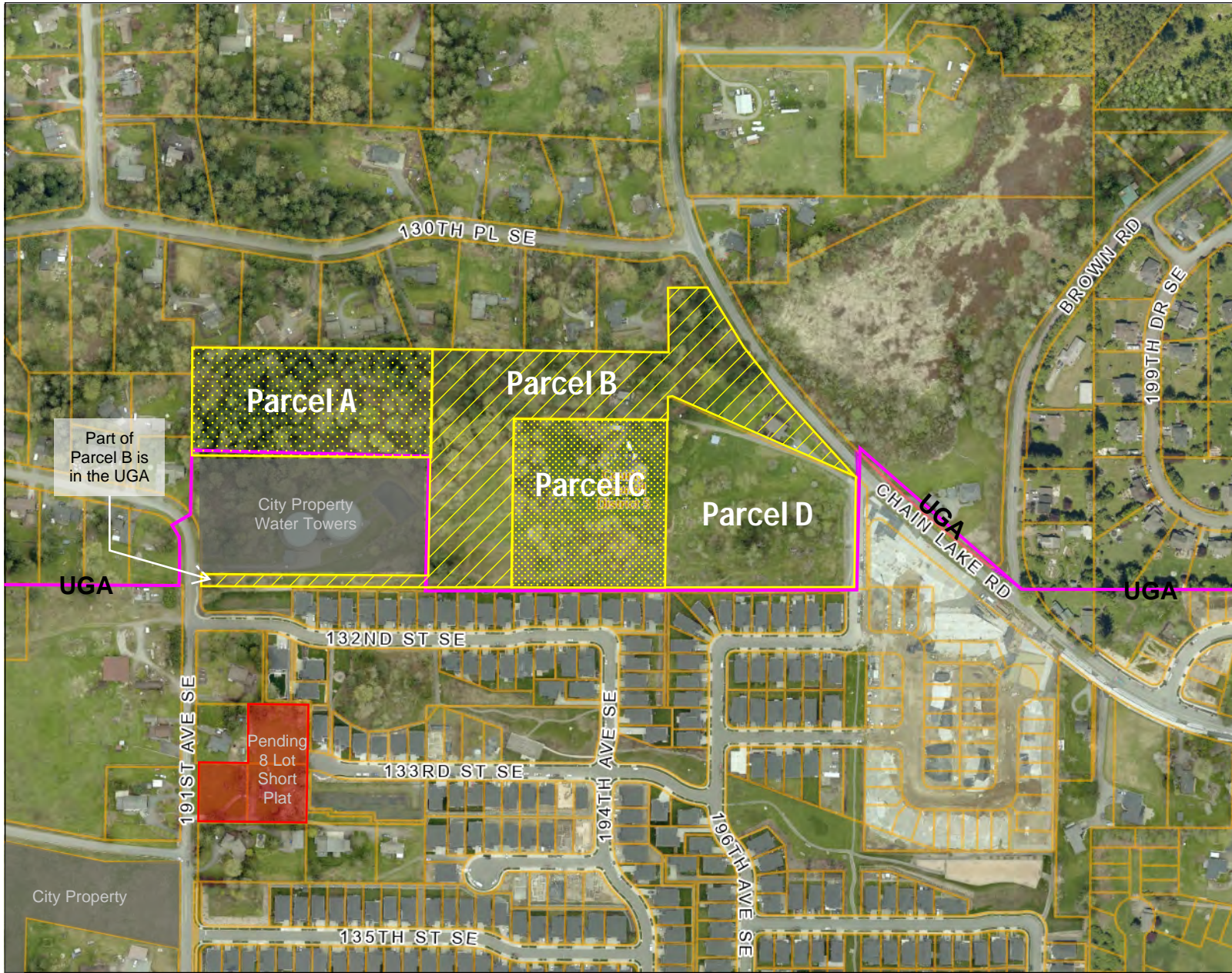
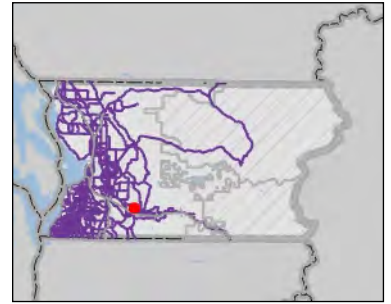
ⁱ *Thurston County v. W. Wash. Growth Mgmt. Hearings Bd.*, 164 Wn.2d 329, 190 P.3d 38, 2008 Wash. LEXIS 812

ⁱⁱ Monroe School District Capital Facilities Plan 2022 – 2027

ⁱⁱⁱ Redefining Economic Success in Washington (2022)

EXHIBIT

A



Legend

- Snohomish County Tax Parcels
- County Boundary
- Urban Growth Boundary
- Municipal Urban Growth Boundary
- Tulalip Indian Reservation Boundary
- Stillaguamish Indian Reservation Boundary
- County Parks
- National Forest Lands
- Washington Counties

1: 4,929



821.5 0 410.73 821.5 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

All maps, data, and information set forth herein ("Data"), are for illustrative purposes only and are not to be considered an official citation to or representation of the Snohomish County Code. Amendments and updates to the Data, together with other applicable County Code provisions, may apply which are not depicted herein. Snohomish County makes no representation or warranty concerning the content, accuracy, currency, completeness or quality of the Data contained herein and expressly disclaims any warranty of merchantability or fitness for any particular purpose. All persons accessing or otherwise using this Data assume all responsibility for use thereof and agree to hold Snohomish County harmless from and against any damages, loss, claim or liability arising out of any error, defect or omission contained within said Data. Washington State Law, Ch. 42.56 RCW, prohibits state and local agencies from providing access to lists of individuals intended for use for commercial purposes and, thus, no commercial use may be made of any Data comprising lists of individuals contained herein.

Notes

This map was automatically generated using Geocortex Essentials.

EXHIBIT

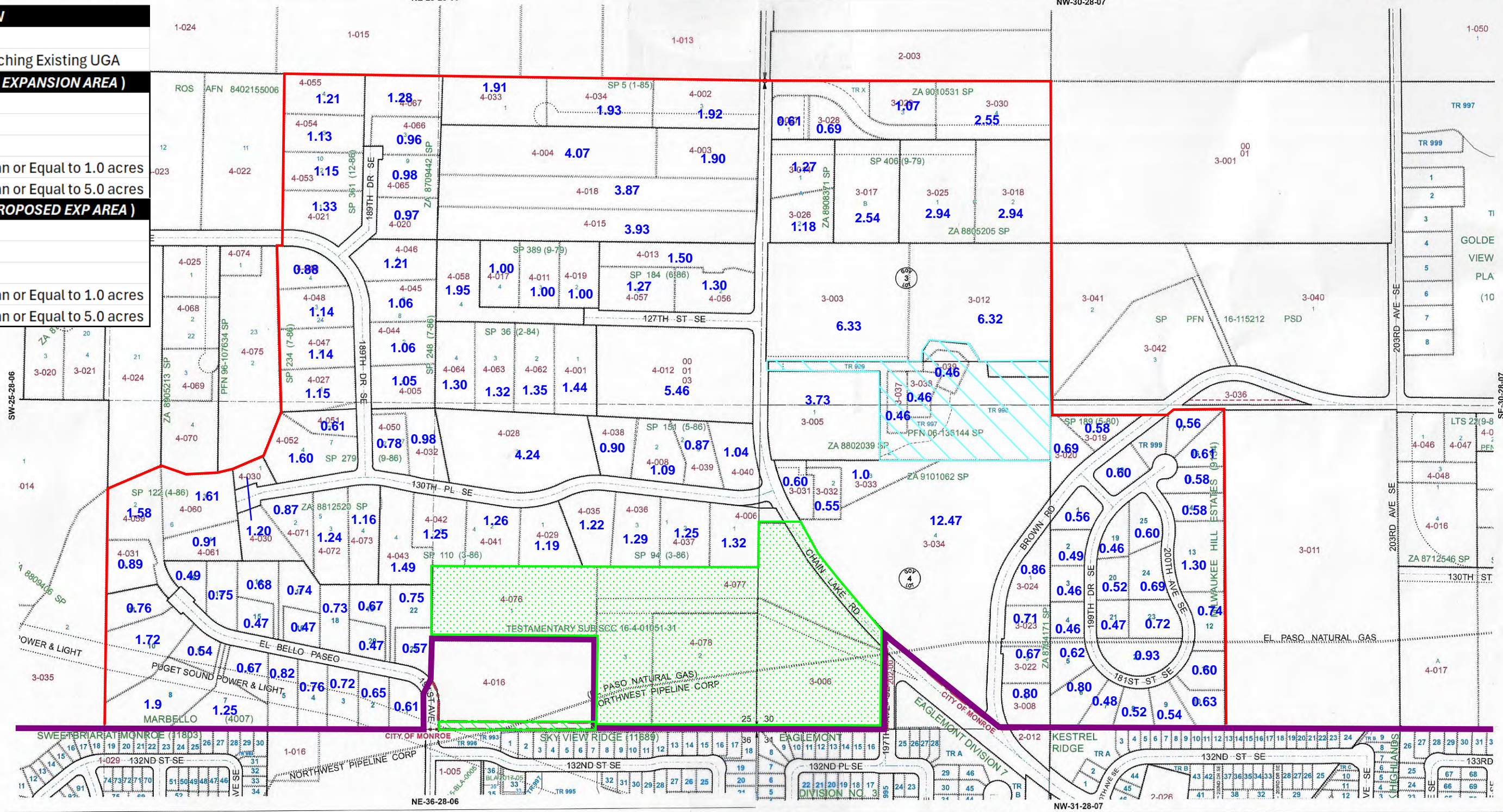
B



QUARTER	SECTION	TOWNSHIP N.W.B.L.	RANGE E.W.M.	SECTION	TOWNSHIP N.W.B.L.	RANGE E.W.M.
SE	25	28	6	30	28	7

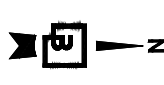
OVERVIEW	
219	Acres Analyzed
49	% of Expansion Area Touching Existing UGA
ANALYSIS (INCL. PROPOSED EXPANSION AREA)	
135	Existing Lots
1.44	Average Lot Size
0.98	Median Lot Size
67	Total Lots Greater Than or Equal to 1.0 acres
6	Total Lots Greater Than or Equal to 5.0 acres
ANALYSIS (NOT INCLUDING PROPOSED EXP AREA)	
131	Existing Lots
1.32	Average Lot Size
0.97	Median Lot Size
63	Total Lots Greater Than or Equal to 1.0 acres
4	Total Lots Greater Than or Equal to 5.0 acres

LEGEND	
	MON2 Expansion
	MON2 Already in UGA
	Existing UGA Boundary
	Post-GMA Rural Cluster Sub
	Area Analyzed
1.61	Parcel Acreage (GIS)



EXHIBIT

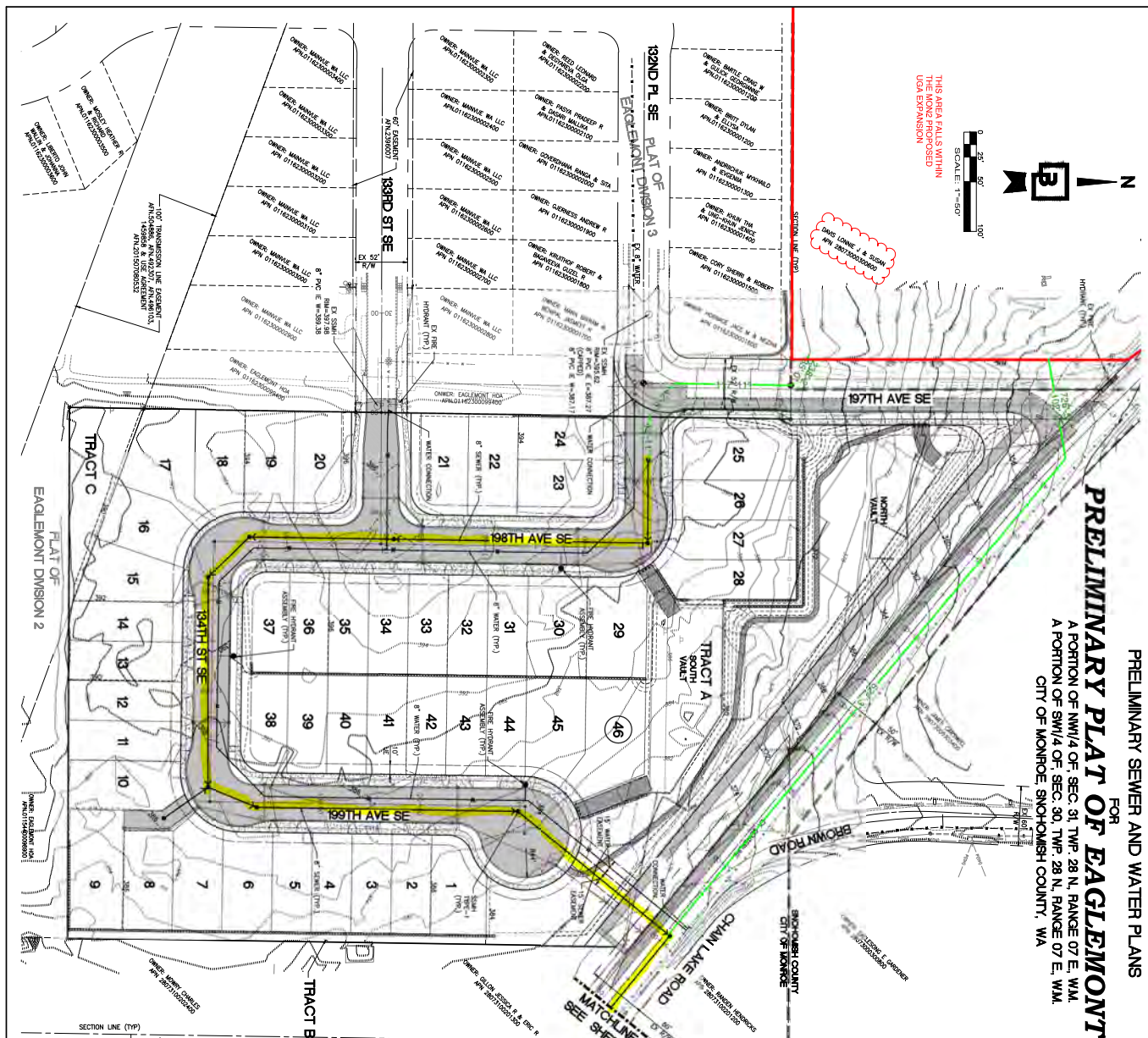
C



THIS AREA FALLS WITHIN
THE WORK PROPOSED
UDA EXPANSION

OWNER: J & S
APN: 01162300000000

PRELIMINARY SEWER AND WATER PLANS
FOR
PRELIMINARY PLAT OF EAGLEMONT 7 PRD
A PORTION OF NW1/4 OF SEC. 31, TWP. 28 N., RANGE 07 E., W.M.
A PORTION OF SW1/4 OF SEC. 30, TWP. 28 N., RANGE 07 E., W.M.
CITY OF MONROE, SNOHOMISH COUNTY, WA



LEGEND	
MAJOR CONTOUR	EXISTING
MINOR CONTOUR	EXISTING
CATCH BASIN	EXISTING
STORM PIPE	EXISTING
SEWER	PROPOSED
CONCRETE	PROPOSED
ASPHALT	PROPOSED

RECEIVED
02/05/2021
CITY OF MONROE

No.	Date	By	Chd.	Appr.	Revision
2	1/29/21	TJS	TJS	BTJ	CITY COMMENTS DATED 1/19/2021
1	11/6/20	BSK	TJS	BTJ	CITY COMMENTS DATED 7/24/19

Job Number
18537

Sheet
7 of **8**

B Barghausen Consulting Engineers, Inc.
18215 72nd Avenue South
Kent, WA 98032
425.251.6222 barghausen.com

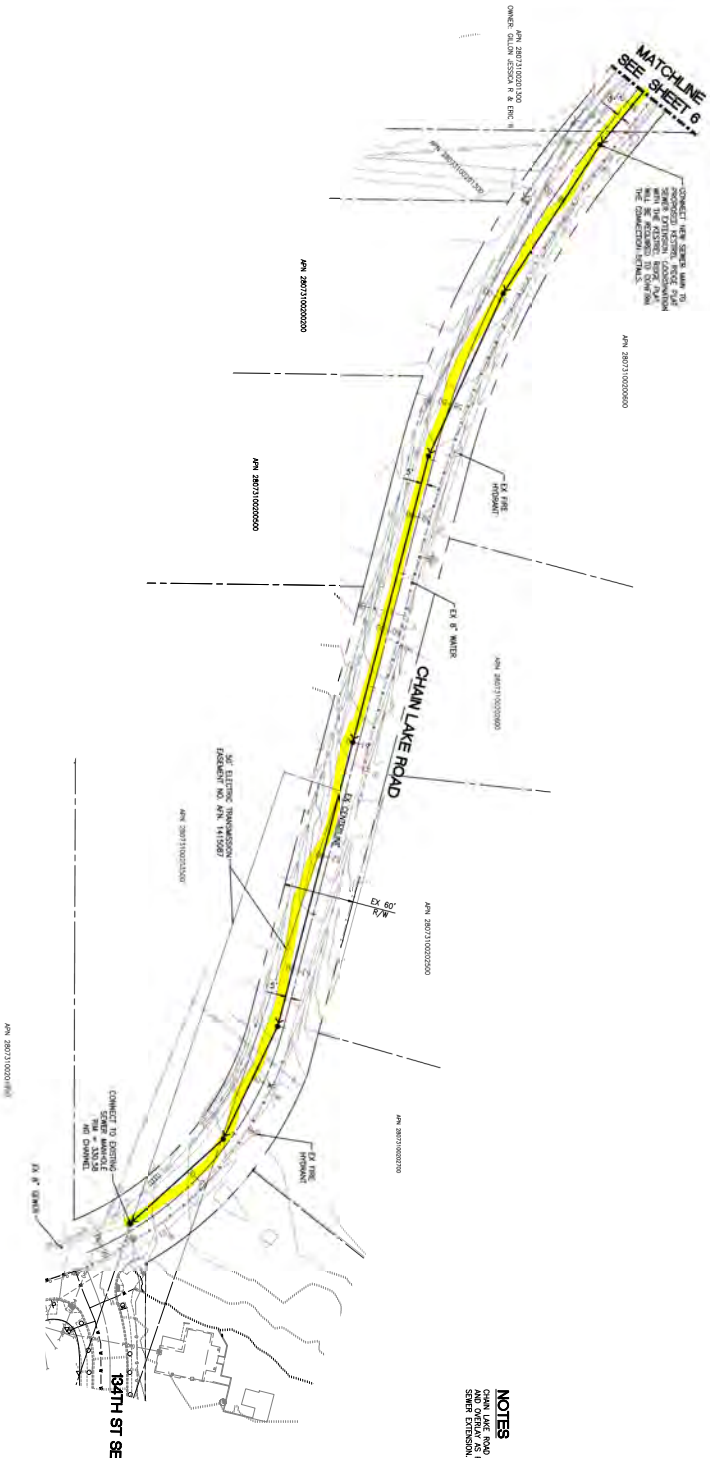
Designed: TJS
Drawn: TJS
Checked: BTJ
Approved: BTJ
Date: 2/1/21

Scale: Horizontal (T=0)
Vertical: N/A

For:
MAINVUE WA LLC
1110 112TH AVE NE, SUITE 202
CONTACT: MONA DAVIS
BELLEVUE, WA 98004

Title:
PRELIMINARY SEWER AND WATER PLANS
FOR
PRELIMINARY PLAT OF EAGLEMONT 7 PRD

PRELIMINARY OFFSITE SEWER EXTENTION
 FOR
PRELIMINARY PLAT OF EAGLEMONT 7 PRD
 A PORTION OF NW1/4 OF SEC. 31 TWP. 28 N. RANGE 07 E. W.M.
 A PORTION OF SW1/4 OF SEC. 30 TWP. 28 N. RANGE 07 E. W.M.
 CITY OF MONROE, SNOHOMISH COUNTY, WA



NOTES
 CHAIN LAKE ROAD MAY REQUIRE A GRIND AND OVERLAY AS PART OF THE SEWER EXTENSION.

LEGEND	
	EXISTING MAIN CONTOUR
	PROPOSED MAIN CONTOUR
	EXISTING CATCH BASIN
	PROPOSED CATCH BASIN
	EXISTING STORM PIPE
	PROPOSED STORM PIPE
	EXISTING SEWER
	PROPOSED SEWER
	EXISTING CONCRETE
	PROPOSED CONCRETE
	EXISTING ASPHALT
	PROPOSED ASPHALT

RECEIVED
 CITY OF MONROE

No.	Date	By	Ckd.	Appr.	Revision
2	1/26/21	TJS	TJS	BT	CITY COMMENTS DATED 1/19/2021
1	11/6/20	BSK	TJS	BT	CITY COMMENTS DATED 7/24/19

Job Number
18537
 Sheet
8 of 8

B Barghausen Consulting Engineers, Inc.
 18215 72nd Avenue South
 Kent, WA 98032
 425.251.6222 barghausen.com

Designed: TJS
 Drawn: TJS
 Checked: BT
 Approved: BT
 Date: 2/1/21

Scale: Horizontal (T=0)
 Vertical: N/A

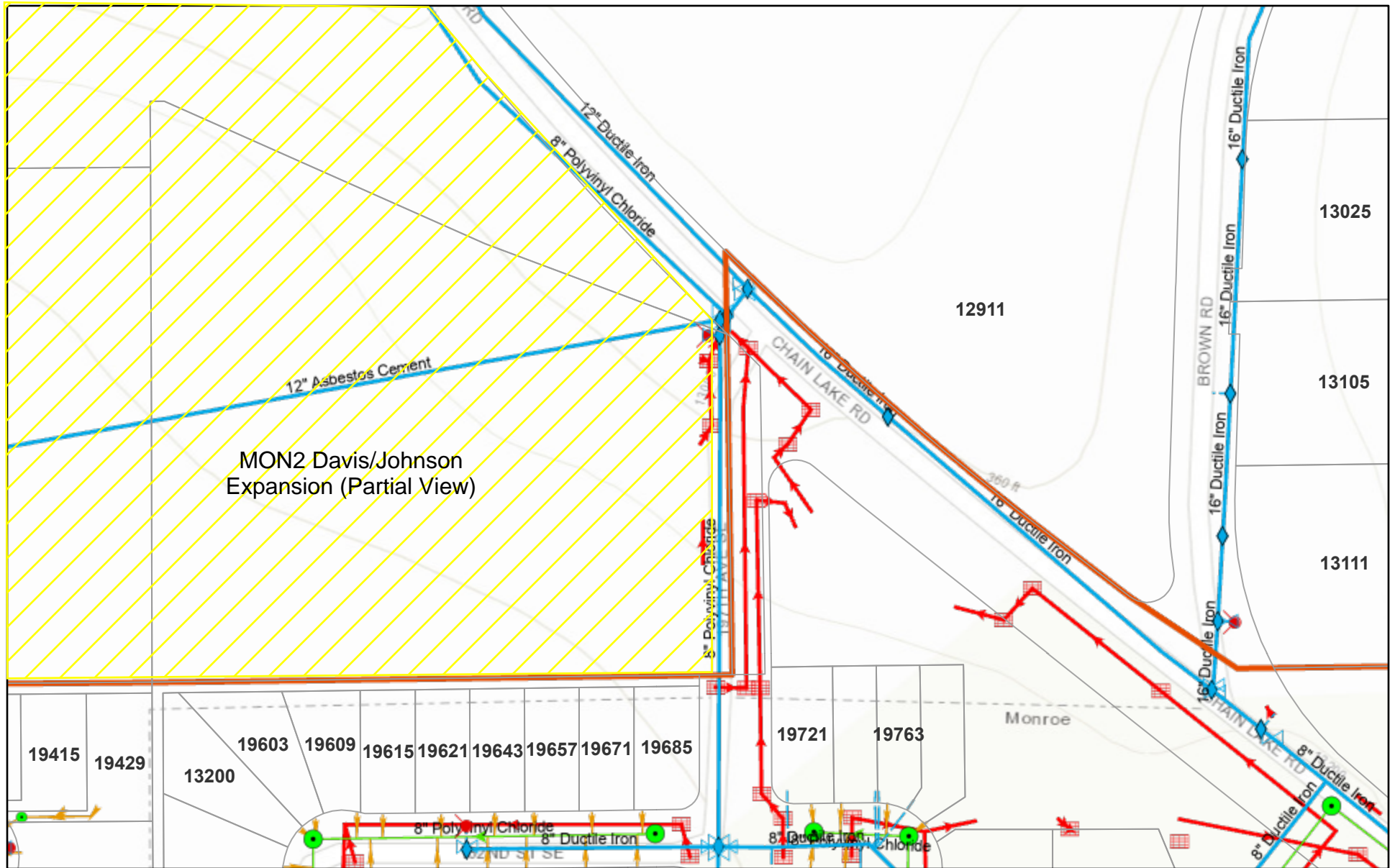
For: **MAINVUE WA LLC**
1110 112TH AVE NE, SUITE 202
CONTACT: MONA DAVIS
BELLEVUE, WA 98004

Title: **PRELIMINARY OFFSITE SEWER EXTENTION FOR PRELIMINARY PLAT OF EAGLEMONT 7 PRD**

EXHIBIT

D

MON2 - Existing Utilities



8/17/2024, 10:54:09 AM

- | | | | |
|------------------------------------|----------------|--------------|--------------------|
| Snohomish County Parcels - Parcels | Main (water) | Valves | Manholes |
| Monroe City Limits | Water Fittings | Valve | Main (storm water) |
| Pipes | Hydrants | Lateral | Cleanout |
| Other Misc. | Main (sewer) | Catch Basins | |

1:2,257
 0 0.01 0.03 0.05 mi
 0 0.02 0.04 0.08 km
 Bureau of Land Management, Esri Canada, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, USDA, City of Monroe

Hickey, Lisa

From: Dunn, Megan
Sent: Tuesday, August 20, 2024 1:40 PM
To: Eco, Debbie
Subject: FW: Seeking Your Input for the Vision of the 2024 Comprehensive Plan Update

For the record

Megan Dunn | *Snohomish County Councilmember, District 2*
O: (425) 388-3494 | megan.dunn@snoco.org
Pronouns: she/her/hers

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From: Kerry Lyste <klyste@stillaguamish.com>
Sent: Monday, August 19, 2024 3:30 PM
To: Killingstad, David <david.killingstad@snoco.org>; Dunn, Megan <Megan.Dunn@co.snohomish.wa.us>
Cc: Titcomb, Sarah <Sarah.Titcomb@co.snohomish.wa.us>; THPO Stillaguamish <THPO@stillaguamish.com>; Kaehler, Gretchen <Gretchen.Kaehler@co.snohomish.wa.us>
Subject: RE: Seeking Your Input for the Vision of the 2024 Comprehensive Plan Update



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Hi David,

It has now been several years since we initially met and discussed updates to the Snohomish County Comp Plan. We are very pleased to see the Tribal Element that you proposed at that initial meeting is now included in the upcoming version.

What I wanted to address in this e-mail is a specific comment we made, that we have not received a response – it is from Mineral Lands, Section 9.A.2 (see below). I have inquired several times on the status of what we believe should be included on the list: **Historic Districts listed on the State or National Register**. This distinction goes to some of Washington State’s and the USA’s most important historic legacies and is a rigorous process governed by the Washington State Department of Archaeology and Historic Preservation (State) and the National Park Service (Nation). We believe these important, special, fragile, and limited resources would be severely impacted by mining operations, and should be included on a list that includes: Commercial Farmland; Public Facilities (such as schools, and parks and trails); and National Forest boundaries.

To be honest, we were surprised that these properties were not on this list. As it stands, Historic Districts on the National Register are given “heightened consideration” in Section 106; EO 2102; SEPA; NEPA; and other consultation, but it would make sense to get in front of this, to exclude these properties before it gets to consultation, providing a much more streamlined process and saving time and resources for all parties concerned.

We sincerely look forward to your response.

Best, Kerry Lyste

9.A.2 The county shall exclude selected mineral resources identified on the inventory from potential designation because of legal, environmental or policy conflicts. Lands which shall be excluded are those:

- located within incorporated city, Urban Growth Area, or National Forest boundaries;
- identified as Tulalip Tribal Trust Lands;
- developed at densities greater than or equal to 0.15 lot per acre (average lot size of 6.67 acres) in neighborhoods with 5 or more homes;
- containing hard-to-replace public facilities (cemeteries, schools/colleges, hospitals, libraries, parks and trails);
- designated Riverway Commercial Farmland, Upland Commercial Farmland, or Local Commercial Farmland by the Snohomish County comprehensive plan;
- designated as a shoreline environment by the Snohomish County Shoreline Management Master Program;
- located within a 300-foot Chinook Salmon/Bull Trout corridor;
- located within a 100-year floodplain;
- isolated islands less than 10 acres, except as provided in [9.A.3](#); and/or
- land with 5-acre or smaller underlying land use designation and/or zoning, except in cases in which the landowner requests mineral resource designation and the site otherwise meets the criteria in [9.A.1](#) and [9.A.2](#).

Kerry Lyste | THPO/GIS Database Administrator

Direct Line: 360-572-3072

Cultural Resources Department

3322 236th Street NE, Arlington, WA 98223

haʔt sgʷədgʷádad ʔə ti stuləgʷabš: kʷədiid ti ʔəčʷusadad ʔə ti yəlabčəʔ
The good words of the Stillaguamish: To honor and care for cultural teachings.



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From: Kerry Lyste <klyste@stillaguamish.com>
Sent: Monday, January 03, 2022 5:24 PM
To: Killingstad, David <david.killingstad@snoco.org>
Cc: Titcomb, Sarah <Sarah.Titcomb@co.snohomish.wa.us>; THPO Stillaguamish <THPO@stillaguamish.com>
Subject: RE: Seeking Your Input for the Vision of the 2024 Comprehensive Plan Update

Thank you David,

We look forward to working with you, Snohomish County, and the involved tribes on the Tribal Element of the GMA Comprehensive Plan.

Best regards, Kerry

Kerry Lyste | THPO/GIS Database Administrator

Direct Line: 360-572-3072

Cultural Resources Department

3322 236th Street NE, Arlington, WA 98223

Mailing Address: PO Box 277, Arlington, WA 98223



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From: Killingstad, David <david.killingstad@snoco.org>
Sent: Thursday, December 23, 2021 8:47 AM
To: Kerry Lyste <klyste@stillaguamish.com>
Cc: Titcomb, Sarah <Sarah.Titcomb@co.snohomish.wa.us>
Subject: RE: Seeking Your Input for the Vision of the 2024 Comprehensive Plan Update

I wanted to introduce myself. I manage the Long Range Planning Division in Planning and Development Services and have been an employee of Snohomish County since 1993.

I want to thank you for the interest in the 2024 Update. Our goal for the project is to be inclusive and hear from all voices in the community. To that end, I would like to let you know that this month the 2024 Update project scope was expanded to include the development of a new Tribal Element to the county's GMA Comprehensive Plan. The county would very much like to coordinate with all three tribes within Snohomish County on this new element.

For full transparency, the request for this tribal element was brought forward by the Tulalip Tribes this past fall. They were heavily involved in a prior effort back in 2016 to add a new chapter to the County's General Policy Plan. That effort unfortunately did not come to fruition. That work will be a likely starting point for the new element.

We are still working out the details of how we will proceed moving the effort forward. I'd like to reconnect with you in January to discuss our approach moving forward.

I hope you have a wonderful holiday and happy new year.



David Killingstad | Long Range Planning Manager
Snohomish County Planning and Development Services
3000 Rockefeller Avenue M/S 604 | Everett, WA 98201
425-262-2215 | david.killingstad@snoco.org

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From: Kerry Lyste <klyste@stillaguamish.com>
Sent: Friday, December 17, 2021 2:06 PM
To: Titcomb, Sarah <Sarah.Titcomb@co.snohomish.wa.us>

Cc: THPO Stillaguamish <THPO@stillaguamish.com>

Subject: RE: Seeking Your Input for the Vision of the 2024 Comprehensive Plan Update

CAUTION : This email originated from outside of this organization. Please exercise caution with links and attachments.

Hi Sarah,

Thank you for notification on this. We would like to request a meeting to discuss and consult on Updates to the 2024 Snohomish County Comp Plan.

Best, Kerry

Kerry Lyste | THPO/GIS Database Administrator

Direct Line: 360-572-3072

Cultural Resources Department

3322 236th Street NE, Arlington, WA 98223

Mailing Address: PO Box 277, Arlington, WA 98223



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From: Titcomb, Sarah <Sarah.Titcomb@co.snohomish.wa.us>

Sent: Wednesday, December 15, 2021 10:39 AM

Cc: Canola, Eileen <Eileen.Canola@co.snohomish.wa.us>

Subject: Seeking Your Input for the Vision of the 2024 Comprehensive Plan Update

Having trouble viewing this email? [View it as a Web page \[gcc02.safelinks.protection.outlook.com\]](#)

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[\[gcc02.safelinks.protection.outlook.com\]](#)



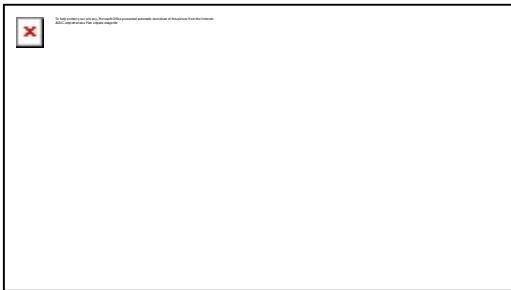
[\[gcc02.safelinks.protection.outlook.com\]](#) [\[gcc02.safelinks.protection.outlook.com\]](#)

Snohomish County Department of Planning and Development Services (PDS) is reaching out to let you know that the County is updating its Comprehensive Plan [\[gcc02.safelinks.protection.outlook.com\]](#) [\[gcc02.safelinks.protection.outlook.com\]](#), and that there are key opportunities for your input.

Snohomish County is working towards a resilient, inclusive, and vibrant future so that all residents can thrive. What does this mean to you? Who do we want to be in 2044, and what should the county look like?

Let us know what you would like the county to look like by filling out this online form or emailing the project team directly at 2024Update@snoco.org. From now until February 25, 2022, we will collect your comments and work with you and other members of the community.

Click here to submit your visioning comments [\[gcc02.safelinks.protection.outlook.com\]](https://gcc02.safelinks.protection.outlook.com/gcc02.safelinks.protection.outlook.com)
[\[gcc02.safelinks.protection.outlook.com\]](https://gcc02.safelinks.protection.outlook.com/gcc02.safelinks.protection.outlook.com)



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[\[gcc02.safelinks.protection.outlook.com\]](https://gcc02.safelinks.protection.outlook.com/gcc02.safelinks.protection.outlook.com)One current opportunity to engage with the 2024 Comprehensive Plan Update is to help the county craft a Vision statement. The Comprehensive Plan is a guideline for the County's development, and how the Plan is updated could impact you and your community's daily lives. From encouraging the construction or maintenance of sidewalks, to protecting natural areas and ensuring there is affordable housing, the Comprehensive Plan's goals, objectives, and policies will touch on and need to balance a wide variety of subjects.

The County will synthesize input from the public, elected officials, and other local and regional bodies into one aspirational Vision statement for consideration by County Council. The Vision statement will therefore reflect the values of the community, unite the many elements of the Comprehensive Plan, and guide the Comprehensive Plan for a 20-year planning horizon. The Vision statement and guiding principles must align with state, regional, and local frameworks, although it also must be grounded in an understanding of current conditions, trends, and the public's values. As it is aspirational, this shared vision of the future may never come to pass, but the 2024 Comprehensive Plan will aim us towards the shared vision through its many goals, objectives, and policies.

Please Submit Your Vision and thoughts using the [Visioning Comment Form](#)
[\[gcc02.safelinks.protection.outlook.com\]](https://gcc02.safelinks.protection.outlook.com/gcc02.safelinks.protection.outlook.com) [\[gcc02.safelinks.protection.outlook.com\]](https://gcc02.safelinks.protection.outlook.com/gcc02.safelinks.protection.outlook.com)

- What Do you Want Snohomish County to Look Like in 2044?

Thank you for participating in the Snohomish County 2024 Comprehensive Plan Update! To learn more about the Snohomish County 2024 Comprehensive Plan Update & Visioning Process, please [visit our](#)

[project webpage here \[gcc02.safelinks.protection.outlook.com\] \[gcc02.safelinks.protection.outlook.com\]](#),
and check out these two videos we put together on this important project:

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[gcc02.safelinks.protection.outlook.com]
- <https://www.youtube.com/watch?v=Ycj13B1EJzQ> [gcc02.safelinks.protection.outlook.com]
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Do not click on links or open attachments unless you are sure you recognize the sender and you know the contents are safe**

Hickey, Lisa

From: Kim Toskey <kimt@homesandhopeclt.org>
Sent: Wednesday, August 21, 2024 4:50 PM
To: Hickey, Lisa; Contact Council
Subject: MON2 Annexation
Attachments: SnoCo council ltr. MON2.signed.pdf

Please share this letter of support for the MON2 annexation with council members.

Thank you!

In Community,
Kim Toskey
President & CEO, Homes and Hope Community Land Trust
Attainable Housing Volunteer, Advocate, Practitioner
425.422.5286
Grounding our Community with Permanently Affordable Homes





Snohomish County Council
3000 Rockefeller Avenue, M/S 609
Everett, WA 98201

August 21, 2024

Re: MON2 UGA Expansion

Greetings, Snohomish County Council Members and Neighbors!

Homes and Hope Community Land Trust (HHCLT) incorporated with the defined service area of Snohomish County, and to date, most of our activities have been along the I5 corridor. Monroe and the eastern part of our county are under increasing pressure to develop enough housing while also maintaining green spaces. The annexation into Monroe City boundaries of the property along Chain Lake Road, near the elementary school, would facilitate many more new homes and potentially of different sizes and price points.

HHCLT would love to see more new development in Monroe and the Sky Valley communities, especially if the new homes would meet the needs of working families and aging seniors. We would happily partner with the City and the property owners to work on a community layout that offered many different housing options, including cottages, townhomes and single-family homes with ADUs (granny flats/MIL apartments).

Thank you for considering this annexation of MON@, and for your continued efforts to meet the needs of all of our Snohomish County neighbors!

In Community,


Kim Toskey, CEO

info@homesandhopeclt.org
425.686.0557 or 425.422.5286

Mailing: 10224 53rd Ave. W., Mukilteo, WA 98275 Office: 14 E. Casino Rd. #B10, Everett, WA 98208

Hickey, Lisa

From: lynn Nixon
Sent: Thursday, August 22, 2024 3:12 PM
To: Contact Council
Subject: Urban Tree Canopy Policies

Members of the Snohomish County Council:

I am writing to express my support for adopting the Urban Tree Canopy Policies as part of the Natural Environment Element of the Snohomish County Comprehensive Plan.

The current policies have not been effective at protecting and preserving the amount of canopy in our county. I have lived in Everett for over 40 years and have watched the number of trees decrease over this time. While housing is needed, allowing developers to strip a parcel of most or all the trees if they replant, doesn't make sense. We know now how important the older, bigger trees are in fighting the effects of climate change and providing a healthy environment for all of us. The policies need to be updated.

I urge you to support adopting the Urban Tree Canopy Policies.

Thank you for your consideration.

Lynn Nixon
4205 Ridgemont Drive
Everett, WA 98203

Hickey, Lisa

From: 2023Update@snoco.org, SCD-
Sent: Monday, August 26, 2024 11:52 AM
To: Hickey, Lisa
Subject: FW: Online Form Submission #158878 for General Comment Form for the 2024 Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

Good Morning,

Below is a 2024 Comprehensive Plan update public comment.

Best,
Sarah

Sarah Titcomb | *Principal Planner*

[Snohomish County Planning and Development Services](#) | Long Range Planning Division
3000 Rockefeller Avenue M/S 604 | Everett, WA 98201
425-262-2128 | Sarah.Titcomb@snoco.org
she/her/hers

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From: noreply@civicplus.com <noreply@civicplus.com>
Sent: Sunday, August 25, 2024 11:32 PM
To: 2023Update@snoco.org, SCD- <2024Update@snoco.org>
Subject: Online Form Submission #158878 for General Comment Form for the 2024 Comprehensive Plan

General Comment Form for the 2024 Comprehensive Plan

Introduction

Please use this form to send a question or comment about the 2024 Comprehensive Plan Update.

WHAT IS THE COMPREHENSIVE PLAN?

The Comprehensive Plan is a policy document that guides Snohomish County decisions on a wide range of topics and services over a 20-year time period.

WHY ARE WE UPDATING IT?

When adopted, the County's Comprehensive Plan will cover the planning period from 2024 to 2044. Between now and June 2024, the Comprehensive Plan will go through a major update to:

- Plan for an estimated population increase of roughly 308,000 people countywide between 2020 and 2044.
- Meet state and local requirements, in particular for locating over 80% of the population growth to cities and high-capacity transit areas while preserving rural areas and enhancing natural areas.
- Update the elements of the comprehensive plan to reflect new data and information for transportation, parks, and recreation, housing, economic development, land use, natural environment, and capital facilities.
- Reflect input from the community.

Providing your contact information is optional. However, contact information is necessary if you want to receive future notices related to this topic.

Title VI / ADA

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Para solicitar esta encuesta en español, envíe un correo electrónico con el siguiente asunto: "2024 Update General Comment- Spanish Translation Request" y enviarlo a 2024Update@snoco.org desde la cuenta de correo electrónico a la que usted desee que respondamos. Asimismo, puede ponerse en contacto con el Coordinador del título VI del Condado de Snohomish al teléfono 425-388-6660.

이 설문 조사를 한국어로 요청하시는 경우, 당사에서 회신해 주기를 바라는 이메일 주소인 2024Update@snoco.org 로 "2024 Update General Comment - Korean Translation Request" 이라는 제목의 이메일을 보내 주시기 바랍니다. 또는 425-388-6660 번으로 전화하면 Snohomish County Title VI 코디네이터와 상담을 할 수 있습니다.

Contact Information

Submitted by	Individual
(if applicable) Organization	Field not completed.
First Name	brian
Last Name	mitchell
Address	22527 57th ave se

City	bothell
State	wa
ZIP Code	98021
Email1	brian.mitchell@cwu.edu
Receive project email updates?	Sign up for email

Your Comment

Question/Comment	<p>My name is Brian Mitchell, my family has lived in the Snohomish county for over 100 years, including the Bothell area. Through social media I was made aware that the planed zoning would affect the zoning for WCW Shooting Sports aka the Kemore Gun Range. It is currently zoned Low Density Multiple Residential (R-9600) and the plan calls for it to be upzoned to Urban Medium Density Residential. Looking at the comp plan maps It would be the only thing in the surrounding area zoned that way. I am opposed to the re-zone of the WCW Shooting Sports 80-acre parcel</p> <p>I would like to point to an article from the Herald: Officials back shooting range By Jeff Switzer Monday, August 8, 2005: "The owners of the Kenmore Gun Range property shouldn't be pressured into building hundreds of homes or condos, despite occupying 80 tempting acres of mostly vacant urban land, county officials said</p> <p>Instead, it should remain an oasis for shooters surrounded by hundreds of homes on culs-de-sac in the county's urban core between Bothell and Brier. We promised we would be an outdoor recreation area forever," said Vic Alvarez, a board member of Wildlife Committee of Washington, which owns the gun club. "We provide a very necessary service not only to law enforcement and the military but to the community."</p> <p>The property owners face a proposal to change the zoning that would make the land even more valuable and increase the pressure to sell, said County Councilman Dave Gossett, who opposes allowing more homes on the gun range property. "It's been there a long, long, long time," Gossett said. "I don't want to pressure it to change."</p> <p>The land is owned by about 2,000 gun club members, whose dues pay the bills and who have no plans to sell the property. "We're a nonprofit club, and nobody can benefit from the assets," Alvarez said. "There's no incentive to sell. We paid</p>
------------------	---

\$9,000 for that property, and it's worth \$10 million."

The club bought the land in 1953, Alvarez said, when the area was undeveloped woods and dead-end roads. The property was designated open space in the early 1970s, Alvarez said. Today, at least 500 homes sit within 300 yards of the property's borders, Alvarez said.

Current zoning would allow about four homes per acre on the gun range property, similar to what's allowed in the surrounding neighborhoods.

This spring, county staff and County Executive Aaron Reardon proposed rezoning the property, opening the door to allowing about 24 multi-family living units per acre, or 36 senior apartments per acre.

The property was proposed for a boost in growth as the county makes plans to handle a population of 930,000 people by 2025, county planner Michael Zelinski said. The land is large and could easily be redeveloped on a main road in the urban area.

The county Planning Commission and Gossett, whose district includes the range, oppose the proposal.

The property's assessed value is \$14.5 million, according to the county assessor's office, but the land is now tax-exempt open space, which discounts the value to about \$500,000.

The property was considered as a location for the Brightwater sewage treatment plant until King County officials pulled it from the list in 2001.

Gossett said he occasionally fields noise complaints about the shooting range, which has posted operating hours of noon to dusk on weekdays and 9 a.m. to dusk on weekends.

The property is needed for law enforcement practice and sport shooters, Gossett said.

As shooting ranges close around the region, the demand for Kenmore Gun Range increases, Alvarez said.

Bothell police use the range for lessons and calibration of new rifles, Bothell police Capt. Denise Langford said.

"It can be really difficult to find appropriate places to shoot," she said. "It's nice to have options open in rifle ranges, and it is certainly nice to have something that close."

Area officers and SWAT teams from Everett, Lynnwood Edmonds, Mountlake Terrace, Bothell and Redmond, as well as the Navy and Coast Guard, have used the range for pistol and rifle exercises, Alvarez said.

They don't have to pay, Alvarez said. "We think it's in our best interest to have police who know how to shoot," he said."

I feel like the reason the plan intends to upzone this parcel is to try entice the club into selling the land. It provides a valuable

service to the community and law enforcement and should not be pushed into giving up land for future development.

(Optional) Please upload any files that will help us better understand your comment(s).

Field not completed.

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Hickey, Lisa

From: 2023Update@snoco.org, SCD-
Sent: Monday, August 26, 2024 1:08 PM
To: Ashebir Saketa; 2023Update@snoco.org, SCD-
Cc: Hickey, Lisa
Subject: RE: Regarding the comprehensive plan to my property

Follow Up Flag: Follow up
Flag Status: Completed

Good Afternoon,

The 2024 Comprehensive Plan Update has not yet been adopted, and the ultimate decision about what to adopt will be made by the County Council. They held a public hearing on August 19th, and the record will remain open until September 11th.

The address listed below is currently zoned R-9,600 with a future land use designation of Urban Low Density Residential, and the Executive Recommended Plan is to rezone the property to R-7,200 and change the future land use designation to Urban Medium Density Residential. The Recommendation as well as three alternatives studied under the Draft Environmental Impact Statement (DEIS) are under consideration by the County Council. The final decision will be made by the County Council likely in the coming weeks.

Best Regards,
Sarah

Sarah Titcomb | Principal Planner
Snohomish County Planning and Development Services | Long Range Planning Division
3000 Rockefeller Avenue M/S 604 | Everett, WA 98201
425-262-2128 | Sarah.Titcomb@snoco.org
she/her/hers

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-----Original Message-----

From: Ashebir Saketa <ashebir321@yahoo.com>
Sent: Friday, August 23, 2024 11:13 AM
To: 2023Update@snoco.org, SCD- <2024Update@snoco.org>
Subject: Regarding the comprehensive plan to my property

Hi Sarah

This is Ashebir you emailed me about my property question a while ago about the 2024 comprehensive development. I went in the county planning and department asked them about the new comprehensive development she told me that spoke with you. You will have a better answer for my question. Is there any new updates? It's regarding the reasoning to LOW DENSITY RESIDENT Here is my property address

1413178th ST SW
Lynnwood,WA 98037

My phone number
(206) 390-9666

Thank you
Ashebir Saketa

Hickey, Lisa

From: 2023Update@snoco.org, SCD-
Sent: Tuesday, August 27, 2024 10:28 AM
To: Hickey, Lisa
Subject: FW: Online Form Submission #158939 for General Comment Form for the 2024 Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

Good Morning,

Below is a new public comment for the 2024 Update.

Best,
Sarah

Sarah Titcomb | *Principal Planner*
[Snohomish County Planning and Development Services](#) | Long Range Planning Division
3000 Rockefeller Avenue M/S 604 | Everett, WA 98201
425-262-2128 | Sarah.Titcomb@snoco.org
she/her/hers

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From: noreply@civicplus.com <noreply@civicplus.com>
Sent: Tuesday, August 27, 2024 9:38 AM
To: 2023Update@snoco.org, SCD- <2024Update@snoco.org>
Subject: Online Form Submission #158939 for General Comment Form for the 2024 Comprehensive Plan

General Comment Form for the 2024 Comprehensive Plan

Introduction

Please use this form to send a question or comment about the 2024 Comprehensive Plan Update.

WHAT IS THE COMPREHENSIVE PLAN?

The [Comprehensive Plan](#) is a policy document that guides Snohomish County decisions on a wide range of topics and services over a 20-year time period.

WHY ARE WE UPDATING IT?

When adopted, the County's Comprehensive Plan will cover the planning period from 2024 to 2044. Between now and June 2024, the Comprehensive Plan will go through a major update to:

- Plan for an estimated population increase of roughly 308,000 people countywide between 2020 and 2044.
- Meet state and local requirements, in particular for locating over 80% of the population growth to cities and high-capacity transit areas while preserving rural areas and enhancing natural areas.
- Update the elements of the comprehensive plan to reflect new data and information for transportation, parks, and recreation, housing, economic development, land use, natural environment, and capital facilities.
- Reflect input from the community.

Providing your contact information is optional. However, contact information is necessary if you want to receive future notices related to this topic.

Title VI / ADA

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Contact Information

Submitted by	Individual
(if applicable) Organization	League of Women Voters of Snohomish County
First Name	Kate
Last Name	Lunceford
Address	1527 232nd PI SW

City	Bothell
State	WA
ZIP Code	98021
Email1	kurlykate888@gmail.com
Receive project email updates?	Sign up for email

Your Comment

Question/Comment	<p>I urge the County Council to reject rezoning the WCW Shooting Sports gun range to denser housing. These 80 acres are contiguous with Shelton View Forest (https://www.sheltonviewforest.org/visit-the-forest) creating a rare opportunity to protect significant habitat in the SWUGA. The gun club is already a conservation area and conserving the WCW Shooting Sports' 80 acres and integrating it with Shelton View Forest, you ensure that both the ecological integrity and the range of benefits provided by the open space ecosystem are preserved for future generations. These services include:</p> <p>Recreational and Educational Opportunities: Conserved lands offer recreational opportunities such as hiking and wildlife observation, and they serve as valuable outdoor classrooms for education about nature and conservation.</p> <p>Wildlife Habitat Connectivity: Maintaining contiguous habitat helps ensure that wildlife can move freely between different areas. This is crucial for species that require territories for food, breeding, or other life processes. The connection between the WCW Shooting Sports land and Shelton View Forest helps support a larger, uninterrupted ecosystem.</p> <p>Biodiversity Preservation: Larger, connected habitats support greater biodiversity by providing a wider range of ecological niches and resources. This helps sustain diverse plant and animal species and reduces the risk of extinction for sensitive or endangered species.</p> <p>Ecosystem Services: Open forested areas provide essential ecosystem services, such as clean air and water, carbon sequestration, and soil stabilization. By preserving these lands, we ensure that these critical services continue to benefit both</p>
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the local environment and human communities.

Climate Resilience: Connected forests are more resilient to climate change impacts. They can better regulate temperatures, manage water cycles, and support species adaptation to changing conditions.

(Optional) Please upload any files that will help us better understand your comment(s).

Field not completed.

Email not displaying correctly? [View it in your browser.](#)

Hickey, Lisa

From: Robert Marmaduke PE <rmarmaduke@gmail.com>
Sent: Tuesday, August 27, 2024 3:44 PM
To: Contact Council
Subject: School and Police Impacts of SnoCo 2024 Comprehensive Plan Update

Am a former STEM HS Teacher in Des Moines, as well as a former Planning Commissioner with Town of Mukilteo. The last slide presentation we saw from the County (if I recall right) designated Mukilteo as a 'vital transit hub' and recommended rezoning SFRs to MFRs, in order to permit 5,000+ low-income housing units. Something like that.

Regardless of your final numbers, my comment relates to an appalling impact of incoming ESL low-income students, observed as a teacher in Des Moines. My class was more than 50% minority, and about 33% Slav migrants from Ukraine. Disruptive is not the word. **Chaos**. Student checkout. Collapsing test scores. Drug dealing. Hall monitors in flak jackets. Student suicide. Student **MURDER**. *There are school districts in California where 4 of 5 minority Seniors can't read or write to even be tested!*

I'd expect the County EIS to address not only the loss of 'green-space', but the School and Police impact of 5,000 ESL influx on a small town of 11,000. I've taught 100% minority and also 100% 'at risk' dropouts in other settings, with good results. But overcrowding like Des Moines adding 50% low-income means classrooms jumping from 25 to 37.

There is high-quality statistical data from Stanford and Yale on impact of clashing socio-economic cohorts on the schools' performance. It creates a 'tipping point' educational-environmental disaster.

I hope the SnoCo final EIS has a entire unit on population transition as it really exists. You're losing Marysville now, and Lynnwood light-rail could become a case study in how to blow up a school district.

v/r

Robert A. Marmaduke PE, PEng

Anthae360.com

360-447-8753.

On Tue, Aug 27, 2024, 1:11 PM Snohomish County Planning and Development Services <PDS@updates.snoco.org> wrote:

Having trouble viewing this email? [View it as a Web page.](#)

Good afternoon,

Snohomish County has issued the Final Environmental Impact Statement (FEIS) for the Snohomish County 2024 Comprehensive Plan Update pursuant to [WAC 197-11-455](#) and [SCC 30.61.110](#). Attached, please find the Notice of Availability of the FEIS in [English](#), [Spanish](#), [Russian](#), [Korean](#), and [Vietnamese](#). The FEIS can be reviewed online at the [2024 Update Project Page](#) under the Reports tab or be downloaded directly [here \(Full Report\)](#) and [here \(Appendices\)](#). There is no comment period on the FEIS.

More Information on the EIS

Snohomish County is updating its Growth Management Act Comprehensive Plan consistent with the Growth Management Act (GMA; chapter [36.70A RCW](#)). The plan is designed to help the County meet its long-term vision for land use and growth management in unincorporated areas of the county. In accordance with the GMA, the 2024 Update addresses a 2044 horizon year, and considers new population, housing, and job targets, changes to the Future Land Use Map (FLUM), a fair share of affordable housing, housing policy amendments to address racially disparate impacts, and investments in parks and multimodal transportation, utilities, and public services. The comprehensive plan is also required to be consistent with state and regional goals and requirements.

The FEIS studies land use and growth alternatives that include a no action, two action alternatives, and the Executive's Recommended Plan for the unincorporated county:

- Alternative 1, No Action: Adopted Plans – Lower Growth
- Alternative 2, Medium Growth – Focus on High-Capacity Transit Communities
- Alternative 3, Higher Growth
- Executive Recommended Plan

Pursuant to state law, the County Council can adopt the 2024 Comprehensive Plan seven (7) days after the issuance of the FEIS. Please review the County Council's meeting schedule (<https://snohomish.legistar.com/Calendar.aspx>) to stay up to date on their calendar and plans. You can provide public comment to the Council about the Comprehensive Plan up until September 11, 2024, at Contact.Council@co.snohomish.wa.us.

Best Regards,

2024 Comprehensive Plan Update Team
2024Update@snoco.org

- [Notice of Availability FEIS Vietnamese - signed.pdf](#)
- [Notice of Availability FEIS Russian - signed.pdf](#)
- [Notice of Availability FEIS Korean - signed.pdf](#)
- [Notice of Availability FEIS - signed.pdf](#)
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This email was sent to marmaduke@gmail.com using GovDelivery Communications Cloud on behalf of Snohomish County, Washington.



Hickey, Lisa

From: Titcomb, Sarah
Sent: Wednesday, August 28, 2024 11:26 AM
To: Hickey, Lisa
Subject: FW: [External!] RE: Northpoint Development (MV2)

Good Morning,

Below is new 2024 Update correspondence.

Best,
Sarah

Sarah Titcomb | *Principal Planner*
[Snohomish County Planning and Development Services](#) | Long Range Planning Division
3000 Rockefeller Avenue M/S 604 | Everett, WA 98201
425-262-2128 | Sarah.Titcomb@snoco.org
she/her/hers

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From: Angela Gemmer <agemmer@marysvillewa.gov>
Sent: Wednesday, August 28, 2024 10:16 AM
To: Slusser, Frank <frank.slusser@co.snohomish.wa.us>
Cc: Titcomb, Sarah <Sarah.Titcomb@co.snohomish.wa.us>
Subject: RE: [External!] RE: Northpoint Development (MV2)



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Thank you, Frank! Appreciate the update.

Angela

From: Slusser, Frank <frank.slusser@co.snohomish.wa.us>
Sent: Wednesday, August 28, 2024 10:06 AM
To: Angela Gemmer <agemmer@marysvillewa.gov>
Cc: Titcomb, Sarah <Sarah.Titcomb@co.snohomish.wa.us>
Subject: RE: [External!] RE: Northpoint Development (MV2)

Hi Angela,

The hearing on the 2024 Update and Final Docket XXI was continued to September 11 at 10:30 AM, with the record still open for written testimony. It is still possible that the MV2 docket item could be considered as an amendment for the

plan. You can find updated information about the County Council process here:

<https://snohomishcountywa.gov/2134/Council-Hearings-Calendar>

Sincerely,

Frank Slusser | *Senior Planner*

[Snohomish County Planning and Development Services](#) | Long Range Planning

3000 Rockefeller Avenue M/S 604 | Everett, WA 98201

425-262-2944 | frank.slusser@snoco.org

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From: Angela Gemmer <agemmer@marysvillewa.gov>
Sent: Wednesday, August 28, 2024 8:44 AM
To: Slusser, Frank <frank.slusser@co.snohomish.wa.us>
Cc: Titcomb, Sarah <Sarah.Titcomb@co.snohomish.wa.us>
Subject: RE: [External!] RE: Northpoint Development (MV2)



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Hi Frank,

Hope you're doing well. I was out of the office on August 19th, so wasn't able to attend the public hearing. Could you please let me know what the resolution was on the Northpoint Development docket item?

Thank you!

Angela

From: Slusser, Frank <frank.slusser@co.snohomish.wa.us>
Sent: Friday, August 2, 2024 10:29 AM
To: Angela Gemmer <agemmer@marysvillewa.gov>
Cc: Titcomb, Sarah <Sarah.Titcomb@co.snohomish.wa.us>
Subject: RE: [External!] RE: Northpoint Development (MV2)

Hi Angela,

The Snohomish County Planning Commission Recommendation and the Executive Recommendation for the MV2 – NorthPoint Development Final Docket XXI proposal were forwarded to the Snohomish County Council in March 2024. The attached memorandum describes the recommendations. While the Planning Commission recommended approval of the MV2 proposal, it was not included in the Executive Recommendation for the 2024 Update of the County Comprehensive Plan.

Since MV2 was studied in Alternative 3 of the DEIS for the County's 2024 Update, it could still be considered by the County Council.

The County Council has set a public hearing for August 19, 2024, at 6 PM. The hearing will be held in the Jackson Board Room - 8th Floor Robert J. Drewel Building and remotely. You can find more information about the County Council process here: <https://snohomishcountywa.gov/2134/Council-Hearings-Calendar>

Sincerely,

Frank Slusser | Senior Planner

[Snohomish County Planning and Development Services](#) | Long Range Planning

3000 Rockefeller Avenue M/S 604 | Everett, WA 98201

425-262-2944 | frank.slusser@snoco.org

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From: Angela Gemmer <agemmer@marysvillewa.gov>

Sent: Friday, August 2, 2024 10:19 AM

To: Slusser, Frank <frank.slusser@co.snohomish.wa.us>

Subject: RE: [External!] RE: Northpoint Development (MV2)



CAUTION. This email originated from outside of this organization. Please exercise caution with links and attachments.

Hi Frank

Hope you're doing well. Could you please provide an update on the Northpoint docket request.

Thank you,

Angela

From: Slusser, Frank <frank.slusser@co.snohomish.wa.us>

Sent: Wednesday, October 4, 2023 12:46 PM

To: Angela Gemmer <agemmer@marysvillewa.gov>

Subject: [External!] RE: Northpoint Development (MV2)

[CAUTION:] This email originated from outside the City of Marysville. **Do not click links or open attachments** unless you recognize the sender and know the content is safe. Contact helpdesk if you have any concerns or questions.

Hi Angela,

Here is a copy of the application that was submitted.

Thank you,

Frank Slusser | Senior Planner

[Snohomish County Planning and Development Services](#) | Long Range Planning

3000 Rockefeller Avenue M/S 604 | Everett, WA 98201

425-262-2944 | frank.slusser@snoco.org

From: Angela Gemmer <agemmer@marysvillewa.gov>
Sent: Wednesday, October 4, 2023 12:37 PM
To: Slusser, Frank <frank.slusser@co.snohomish.wa.us>
Subject: FW: Northpoint Development (MV2)



Caution. Suspicious Attachment Types. This may be a phishing attempt.

[What's this?](#)

Hi Frank,

Could you please let me know where I can find the submittal materials for the Northpoint Development UGA Expansion request?

Thank you!



Angela Gemmer, Principal Planner
CITY OF MARYSVILLE
Community Development Department
501 Delta Avenue, Marysville, WA 98270
360.363.8240 or agemmer@marysvillewa.gov

How are we doing? Please take our [survey](#).

From: Haylie Miller <hmillier@marysvillewa.gov>
Sent: Tuesday, September 12, 2023 4:56 PM
To: Angela Gemmer <agemmer@marysvillewa.gov>
Subject: FW: Northpoint Development (MV2)

FYI

From: Haylie Miller
Sent: Tuesday, September 12, 2023 4:55 PM
To: Mark James <mjames@marysvillewa.gov>; Jon Nehring <jnehring@marysvillewa.gov>
Cc: Gloria Hirashima <GHirashima@marysvillewa.gov>
Subject: RE: Northpoint Development (MV2)

Thanks Mark, we are aware of this UGA request but I really appreciate the attached materials. I have not looked the staff recommendation from the County yet.

Marysville is remaining neutral on this UGA request and we are following the progress to see what the County does.

Thanks,

Haylie

From: Mark James <mjames@marysvillewa.gov>

Sent: Tuesday, September 12, 2023 4:51 PM

To: Jon Nehring <jnehring@marysvillewa.gov>

Cc: Gloria Hirashima <GHirashima@marysvillewa.gov>; Haylie Miller <hmillier@marysvillewa.gov>

Subject: Northpoint Development (MV2)

All,
Just wanted to make sure you were all aware of this plan from SnoCo regarding Marysville/Northpoint.
(see attachment)

We will be hearing about this at tonights SnoCo PC meeting.

Mark

Mark James

Councilmember | City of Marysville

501 Delta Avenue, Marysville, WA 98270

(425) 971-0030 | mjames@marysvillewa.gov

