



# 2024 Comprehensive Plan Update Supplemental EIS

**City of Marysville – October 2024**

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**Prepared by:**

Angela Gemmer, Principal Planner



COMMUNITY DEVELOPMENT DEPARTMENT  
501 Delta Avenue ♦ Marysville, WA 98270 ♦ (360) 363-8100

November 22, 2024

**Subject:** 2024 Comprehensive Plan Update and Final Supplemental Environmental Impact Statement (SEIS)

Dear Reader,

The City of Marysville (City) has updated its Growth Management Act (GMA) Comprehensive Plan to address the 20-year planning period 2024 through 2044. The Plan was originally adopted in 2005 and amended in 2015. The proposed 2024 Comprehensive Plan is a continuation of the community vision set forth in the prior versions of the Comprehensive Plan, with land use designations and goals and policies that are substantially similar to those established in 2005 and updated in 2015. Revitalization of the Downtown and Waterfront as a civic and commercial hub; promoting mixed-use development in appropriate locations; preserving the scale and form of existing residential areas while accommodating new growth; and advancing business and living wage job growth – particularly in the Cascade Industrial Center – continue to be key City initiatives. The proposed Comprehensive Plan has also been updated to address new State, Puget Sound Regional Council, Snohomish County, and other partner entity initiatives including, but not limited to:

- Planning for housing at all income levels including emergency and permanent supportive housing, and analyzing State requirements pertaining to racially disparate impacts and equity;
- Allowing for “Missing Middle” Housing (e.g. duplexes, townhouses, cottages, etc.) and multiple dwelling units per lot in zones primarily designated for residential;
- Providing for greater flexibility for accessory dwelling units;
- Adopting growth targets, and goal and policy amendments that are consistent with Puget Sound Regional Council’s [VISION 2050](#) and Marysville’s designation as a High-Capacity Transit community; and
- Addressing the various statutes and plans pertaining to transportation and streets, which pertain to Complete Streets, Multi-modal Level of Service standards, and reducing greenhouse gas emissions (GHG) and vehicle miles traveled (VMT).

This Marysville 2024 Comprehensive Plan Update and Supplemental Environmental Impact Statement (SEIS) builds on the 2021 SEIS for the Downtown, the 2009 SEIS for the Downtown and the 2005 Marysville Comprehensive Plan EIS. The Final SEIS includes comments and responses on the Draft SEIS. This 2024 SEIS adopts and supplements:

- Marysville Downtown Master Plan Final SEIS September 2021 and associated Draft SEIS February 23, 2021
- Marysville Downtown Master Plan Final SEIS October 9, 2009 and associated Draft SEIS July 20, 2009
- Marysville Integrated 2005 Comprehensive Plan and Development Regulations Final Environmental Impact Statement (EIS) April 6, 2005 and associated Draft EIS January 13, 2005

The key issues facing decision makers include:

- Approval of the 2024 Comprehensive Plan Update including revised growth targets, transportation improvement projects, and goals and policies.
- Whether to pursue the Action Alternative or SWIFT Alternative. It should be noted that the SWIFT Alternative is not recommended at this time due to the ultimate alignment of the future SWIFT route still pending.
- Consideration of minor Unified Development Code amendments to ensure consistency with the updated Comprehensive Plan.

Please see the City website for more information at [City of Marysville Comprehensive Plan Update \(marysvillewa.gov\)](https://www.marysvillewa.gov). If you desire clarification or have questions please contact Angela Gemmer, Principal Planner, at [agemmer@marysvillewa.gov](mailto:agemmer@marysvillewa.gov) or 360.363.8240.

Sincerely,



Haylie Miller, Community Development Director  
SEPA Responsible Official  
City of Marysville

# Fact Sheet

## Project Title

2024 Comprehensive Plan Update

## Proposed Action and Alternatives

The City of Marysville (City) has updated its Comprehensive Plan to address the 20-year planning period 2024 through 2044. The Plan was originally adopted in 2005 and amended in 2015. The proposed 2024 Comprehensive Plan is a continuation of the community vision set forth in the prior versions of the Comprehensive Plan, with land use designations and goals and policies that are substantially similar to those established in 2005 and updated in 2015. Revitalization of the Downtown and Waterfront as a civic and commercial hub; promoting mixed-use development in appropriate locations; preserving the scale and form of existing residential areas while accommodating new growth; and advancing business and living wage job growth – particularly in the Cascade Industrial Center – continue to be key City initiatives. The proposed Comprehensive Plan has also been updated to address new State, Puget Sound Regional Council, Snohomish County, and other partner entity initiatives including, but not limited to:

- Planning for housing at all income levels including emergency and permanent supportive housing, and analyzing racially disparate impacts and addressing equity;
- Allowing for “Missing Middle” Housing (e.g. duplexes, townhouses, cottages, etc.) and multiple dwelling units per lot in zones primarily designated for residential;
- Providing for greater flexibility for accessory dwelling units;
- Adopting growth targets, and goal and policy amendments that are consistent with Puget Sound Regional Council’s [VISION 2050](#) and Marysville’s designation as a High-Capacity Transit community; and
- Addressing the various statutes and plans pertaining to transportation and streets, which pertain to Complete Streets, Multi-modal Level of Service standards, and reducing greenhouse gas emissions (GHG) and vehicle miles traveled (VMT).

This SEIS evaluates three alternatives:

- A No Action Alternative that continues the existing Comprehensive Plan and zoning for the City updated in 2015. It should be noted that given discrepancies between the City’s

2015 Comprehensive Plan capacity estimates and the 2021 Buildable Lands Report (BLR) capacity estimates, the SEIS has elected to adopt the 2021 BLR capacity estimates;

- An Action Alternative which largely retains the City's existing Comprehensive Plan land use and zoning designations; however, reassesses land use assumptions and growth capacity by evaluating changes within the City since 2015 (i.e. 2021 Downtown Master Plan update land use designation changes, redesignation of the Public Works site, allowance for residential in the Flex zone, modified density assumptions for the Mixed Use zone in the Lakewood neighborhood, etc.) as well as new or modified State laws and Puget Sound Regional Council (PSRC) objectives (i.e. Middle Housing statute, modified growth targets, etc).
- A SWIFT Alternative, which is the same as the Action Alternative except that land use designation/zoning changes are considered for key nodes along State Avenue/Smokey Point Boulevard.

## Proponent and Lead Agency

The City of Marysville

## Location

The Study Area is approximately 11,663 acres and encompasses the entire Marysville Urban Growth Area (UGA). The boundaries of the UGA are generally defined by Interstate 5 to the west, the Arlington UGA to the north, the Lake Stevens UGA to the south, and Highway 9 to the east. The northwest part of the UGA includes the Lakewood Neighborhood, west of Interstate 5.

## Tentative Date of Implementation

December 2024

## Responsible Official

Haylie Miller, Community Development Director  
City of Marysville – Community Development Department  
501 Delta Avenue  
Marysville, WA 98270

## Contact Person

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City of Marysville – Community Development Department  
501 Delta Avenue  
Marysville, WA 98270  
360-363-8240 Direct Line  
[agemmer@marysvillewa.gov](mailto:agemmer@marysvillewa.gov)

## Licenses or Permits Required

The 2024 Comprehensive Plan update required a 60-day review by the State of Washington Department of Commerce (DOC) and other state and regional agencies. The City's request for 60-day review was submitted to the DOC; receipt of the submittal was acknowledged on August 12, 2024 (Submittal ID 2024-S-7353). Locally, the proposals have been reviewed by the Planning Commission with a public hearing anticipated in November 2024. The Planning Commission's recommendation will be forwarded to the City Council who will deliberate and take action.

## Authors and Principal Contributors to the SEIS

The Marysville Community Development Department prepared the SEIS utilizing supporting documentation prepared by:

- [ECOnorthwest](#): Housing Action Plan including Housing Needs Assessment
- Marysville Departments and Divisions including:
  - Community Development Department
  - Geographic Information Systems
  - Parks, Culture and Recreation Department
  - Police Department
  - Public Works Department
- [RH2 Engineering](#): Sewer and Water
- [Transpo](#): Transportation

## Date of Draft SEIS Issuance

October 18, 2024

## Draft SEIS Comment Period

The City of Marysville requested comments from citizens, agencies, tribes, and all interested parties on the Draft SEIS from October 18, 2024 to November 18, 2024.

## Date of Final SEIS Issuance

November 22, 2024

## Date of Final Action

December 9, 2024 (anticipated)

## Documents Supplemented and Adopted

This Marysville 2024 Comprehensive Plan Update and Supplemental Environmental Impact Statement (SEIS) builds on the October 2009 SEIS for the Downtown and the 2005 Marysville Comprehensive Plan EIS. This 2024 SEIS adopts and supplements:

- Marysville Downtown Master Plan Final SEIS September 2021 and associated Draft SEIS February 23, 2021
- Marysville Downtown Master Plan Final SEIS October 9, 2009 and associated Draft SEIS July 20, 2009
- Marysville Integrated 2005 Comprehensive Plan and Development Regulations Final Environmental Impact Statement (EIS) April 6, 2005 and associated Draft EIS January 13, 2005

## Location of Background Data

You may review the City website for more information at [City of Marysville Comprehensive Plan Update \(marysvillewa.gov\)](https://www.marysvillewa.gov). If you desire clarification or have questions please refer to the Contact Person above.

## Availability of Draft SEIS

The Final SEIS is posted on the City website at [City of Marysville Comprehensive Plan Update \(marysvillewa.gov\)](https://www.marysvillewa.gov). See the Contact Person above if you are unable to access the documents on line; alternate formats may be available at cost. Notice of the Availability of the Draft SEIS was sent to the distribution list below and interested parties who provided comments during the Draft SEIS comment period.

# Distribution List

## Tribes

Stillaguamish Tribe

Tulalip Tribes

## Federal Agencies

National Marine Fisheries Services

Natural Resources Conservation Services

US Army Corps of Engineers

US Environmental Protection Agency

US Fish & Wildlife

## State of Washington Agencies

Department of Agriculture

Department of Archaeology & Historical Preservation

Department of Commerce

Department of Ecology

Department of Fish & Wildlife

Department of Natural Resources

Department of Social & Health Services

Department of Transportation

Dept of Health-Env. Health Division

Energy Office

Puget Sound Partnership

## Regional Agencies

Puget Sound Clean Air Agency

Puget Sound Regional Council

## Counties and Cities

City of Arlington

City of Everett

City of Everett- Public Works

City of Lake Stevens

Snohomish County Executive Office

Snohomish County Parks & Rec.

Snohomish County Public Works

Snohomish County Council

Snohomish County PDS

## Districts, Services & Utilities

Community Transit

Fire District 8

Fire District 15

Fire District 21

Getchell Fire District 22

Lake Stevens School District

Lake Stevens Sewer District

Lakewood School District

Marysville Fire District

Marysville Public Library

Marysville School District

Puget Sound Energy

Snohomish County Health District

Snohomish Co. PUD- Water

Snohomish County EDC

Sound Transit Regional Transit Authority

## Boards and Associations

Board of Realtors

Pilchuck Audubon Society

Snohomish /King County Master Builders

Snohomish/Camano Island Co.

## Newspapers

Seattle Times- North Bureau

The Everett Herald



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# 1.0. Summary

## 1.1. Purpose

The City of Marysville (City) is completing an update of its Growth Management Act Comprehensive Plan, which was originally adopted in 2005 and amended in 2015. The current update, which will cover the planning period 2024 – 2044, is required by the Growth Management Act (GMA) (see [RCW 36.70A.130\(5\)\(a\)](#)). The proposed 2024 Comprehensive Plan is a continuation of the community vision set forth in the prior versions of the Comprehensive Plan, with land use designations and goals and policies that are substantially similar to those established in 2005 and updated in 2015. Revitalization of the Downtown and Waterfront as a civic and commercial hub; promoting mixed-use development in appropriate locations; preserving the scale and form of existing residential areas while accommodating new growth; and advancing business and living wage job growth – particularly in the Cascade Industrial Center – continue to be key City initiatives.

The proposed Comprehensive Plan has also been updated to address new State, Puget Sound Regional Council, Snohomish County, and other partner entity initiatives including, but not limited to:

- Planning for housing at all income levels including emergency and permanent supportive housing, and analyzing racially disparate impacts and addressing equity;
- Allowing for “Missing Middle” Housing (e.g. duplexes, townhouses, cottages, etc.) and multiple dwelling units per lot in zones primarily designated for residential;
- Providing for greater flexibility for accessory dwelling units;
- Adopting growth targets, and goal and policy amendments that are consistent with Puget Sound Regional Council’s [VISION 2050](#) and Marysville’s designation as a High-Capacity Transit community; and
- Addressing the various statutes and plans pertaining to transportation and streets, which pertain to Complete Streets, Multi-modal Level of Service standards, and reducing greenhouse gas emissions (GHG) and vehicle miles traveled (VMT).

A limited amount of supporting code amendments to support this work are also proposed. Work on Middle Housing Overlay and accessory dwelling unit code amendments have been initiated and will be completed by the statutory deadline of June 2025.

This Supplemental Environmental Impact Statement (SEIS) builds on the 2005 Marysville Comprehensive Plan EIS, 2009 SEIS for the Downtown Master Plan, and the 2021 SEIS for the Downtown Master Plan, and helps the City fulfill its role as a High-Capacity Transit Community in the Puget Sound Regional Council's VISION 2050 plan evaluated in the VISION 2050 Final Supplemental Environmental Impact Statement issued October 2020.

This SEIS evaluates three alternatives:

- A No Action Alternative that continues the existing Comprehensive Plan and zoning for the City updated in 2015. It should be noted that given discrepancies between the City's 2015 Comprehensive Plan capacity estimates and the 2021 Buildable Lands Report capacity estimates, the SEIS has elected to adopt the 2021 BLR capacity estimates;
- An Action Alternative which largely retains the City's existing Comprehensive Plan land use and zoning designations; however, reassesses land use assumptions and growth capacity by evaluating changes within the City since 2015 (i.e. 2021 Downtown Master Plan update land use designation changes, redesignation of the Public Works site, allowance for residential in the Flex zone, modified density assumptions for the Mixed Use zone in the Lakewood neighborhood, etc.) as well as new or modified State laws and Puget Sound Regional Council (PSRC) objectives (i.e. Middle Housing statute, modified growth targets, etc.
- A SWIFT Alternative, which is the same as the Action Alternative except that land use designation/zoning changes are considered for key nodes along State Avenue/Smokey Point Boulevard.



## 1.3. Planning Process

In 2005, the City of Marysville adopted its GMA Comprehensive Plan. Environmental review for the 2005 Comprehensive Plan included the issuance of an Environmental Impact Statement (EIS). In October 2009, the City adopted the Downtown Master Plan and a Supplemental Environmental Impact Statement (SEIS). In 2015, the City's Comprehensive Plan was updated, which was followed by the Downtown Master Plan (DMP) Update in September 2021. With the 2021 DMP update, a Supplemental Environmental Impact Statement (SEIS) and a Planned Action Ordinance were adopted in September 2021.

The 2024 Comprehensive Plan is largely a continuation of the efforts described above. While there have been various rezones and subarea plans adopted or updated since the adoption of the 2005 Comprehensive Plan, the land use designations and land use pattern of the City is substantially unchanged. Below is a summary of the major planning efforts, and several of the major infrastructure and capital projects, pursued by the City since 2005.

**Planning Efforts.** Significant planning efforts since adoption of the 2005 Plan that are reflected in the updated Comprehensive Plan include, but are not limited to:

- Adoption of, and amendments to, the Downtown Master Plan, East Sunnyside – Whiskey Ridge Subarea Plan, Lakewood Neighborhood Master Plan, Smokey Point Master Plan, and Waterfront Strategic Plan;
- Adoption of the Americans with Disabilities Act (ADA) Self-Evaluation & Transition Plan<sup>1</sup>;
- Preliminary planning for Community Transit's SWIFT Gold Line <sup>2</sup>; and
- Designation of the Cascade Industrial Center as a Regional Center by the Puget Sound Regional Council (PSRC) along with transportation network changes within the Smokey Point Master Plan Area.

**Infrastructure and Capital Projects.** Significant infrastructure and capital projects that have been constructed since adoption of the 2005 Plan and 2015 update that are reflected in the proposed Comprehensive Plan include, but are not limited to:

- State Avenue Corridor Widening;

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<sup>1</sup> Approved in December 2020, the ADA SETP details the path to achieving ADA compliance. Included in the plan is identification of items throughout Marysville that are not ADA-compliant, the process for making such items ADA-compliant, as well as a schedule for implementing changes.

<sup>2</sup> The SWIFT Gold Line, offered through Community Transit, is anticipated to arrive in Marysville in 2027-2029. It will connect downtown Everett, downtown Marysville, and Arlington with several other locations of interest in between.

- Construction of Ebey Waterfront Trail;
- Construction of the First Street Bypass, Cedar Avenue and Second Street Low Impact Design (LID) and Roadway Improvement projects;
- Consolidating many civic functions at the Civic Center and Jail together with associated improvements to Comeford Park, furthering the Downtown as the center of civic-life and converting Delta Avenue to a shared, people-oriented street;
- Acquisition of land by the City to further goals for redevelopment along the City's Waterfront consistent with the Waterfront Strategic Plan;
- Construction of the new SR 529 bridge and 156<sup>th</sup> Street Overcrossing;
- Construction of I-5 Interchange improvements at 116<sup>th</sup> Street NE and 172<sup>nd</sup> Street, with Interchange improvements planned or under construction for SR529, 4<sup>th</sup> Street, 88<sup>th</sup> Street, and a new full interchange at 156<sup>th</sup> Street; and
- Construction of regional stormwater facilities including, Regional Ponds 1 and 2 in the Smokey Point Neighborhood and the Downtown Stormwater Treatment Facility.

Since the Comprehensive Plan was originally adopted in 2005 and updated in 2015, not only has the City experienced tremendous housing, population, and employment growth as depicted in **Exhibit 1-2**, but there have been numerous changes in State law which require revisions to the Comprehensive Plan, land use designations, and codes. These changes include, but are not limited to, the items summarized below which are discussed in further detail in **Section 1.5.2**:

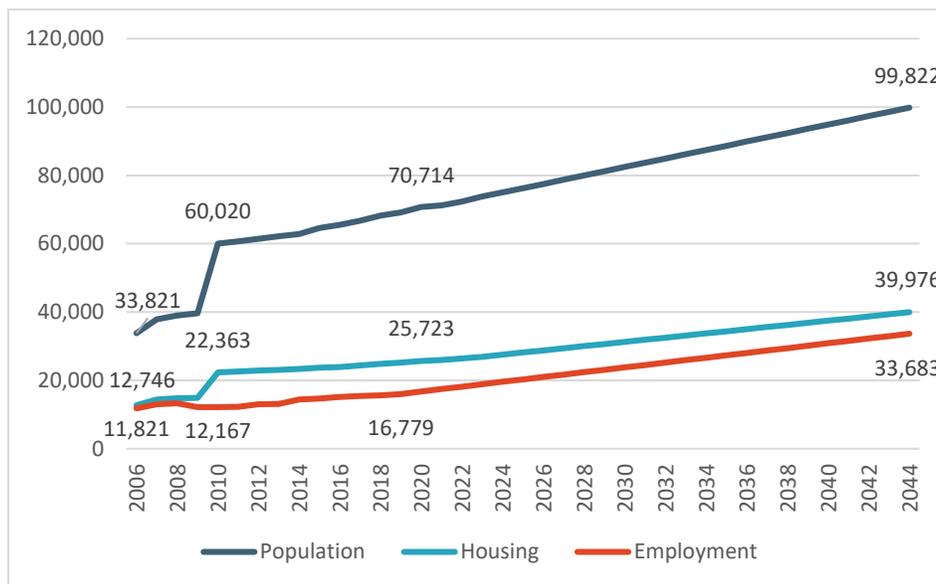
- [E2SHB 1220](#) which includes new Housing Element requirements to plan for housing at all income levels including emergency and permanent supportive housing. Analysis of racially disparate impacts and addressing equity is also required;
- [E2SHB 1110](#)<sup>3</sup> requiring that “missing middle” housing (e.g. duplexes, townhouses, cottages, etc.) and multiple dwelling units per lot in zones primarily designated for residential as described further in **Exhibit 1-7**;
- [EHB 1337](#) requiring jurisdictions to increase the flexibility of their accessory dwelling unit codes;
- Adoption of Puget Sound Regional Council's [VISION 2050](#), associated growth targets (see **Exhibit 1-2**), and designation of Marysville as a High-Capacity Transit community; and

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<sup>3</sup> It should be noted that E2SHB 1110 and EHB 1337 are not required to be implemented until six months after the 2024 Comprehensive Plan update, and that more land use and housing related legislation is in the pipeline.

- Adoption of various statutes and plans pertaining to transportation and streets, which address Complete Streets, Multi-modal Level of Service standards, and reducing greenhouse gas emissions (GHG) and vehicle miles traveled (VMT).

**Exhibit 1-2. Existing and Projected Growth in Marysville – 2006 through 2044**



Source: City of Marysville, 2024.

## 1.4. Public Comment Opportunities

In 2022, the City initiated the Comprehensive Plan update. State law ([36.70A.130](#)) requires counties and cities to establish and broadly disseminate a public participation plan consistent with RCW [36.70A.035](#) and [36.70A.140](#). The City of Marysville’s [Public Participation Plan](#) was adopted by City Council with [Resolution 2520](#), and outlines how the City would engage with the community throughout the 2024 Comprehensive Plan update process. This [Project History](#) provides the public engagement and key steps in the update process.

With the publication of the Draft SEIS, a 30-day comment period was established. See the Fact Sheet for the methods to provide comments.

In addition, the Draft 2024 Comprehensive Plan was reviewed by the Planning Commission and City Council. See the [Project History](#) section on the project website ([City of Marysville Comprehensive Plan Update \(marysvillewa.gov\)](#)) for the public outreach, meetings, and hearings associated with the project.

## 1.5. Objectives and Alternatives

The Washington State Environmental Policy Act (SEPA) requires the statement of objectives by which alternatives can be compared. Some general objectives for the proposal include:

- Maintain consistency with Growth Management Act (GMA) goals, county-wide planning policies for Snohomish County, and the applicable multicounty planning policies in VISION 2050.
- Provide for an efficient land use plan that ensures adequate capacity to accommodate the City's growth allocations for the 20-year planning period 2024 – 2044.
- Provide multimodal transportation improvements and sufficient public services and infrastructure to support the land use vision.

In addition, the goals outlined in the [2024 Comprehensive Plan](#) are considered objectives.

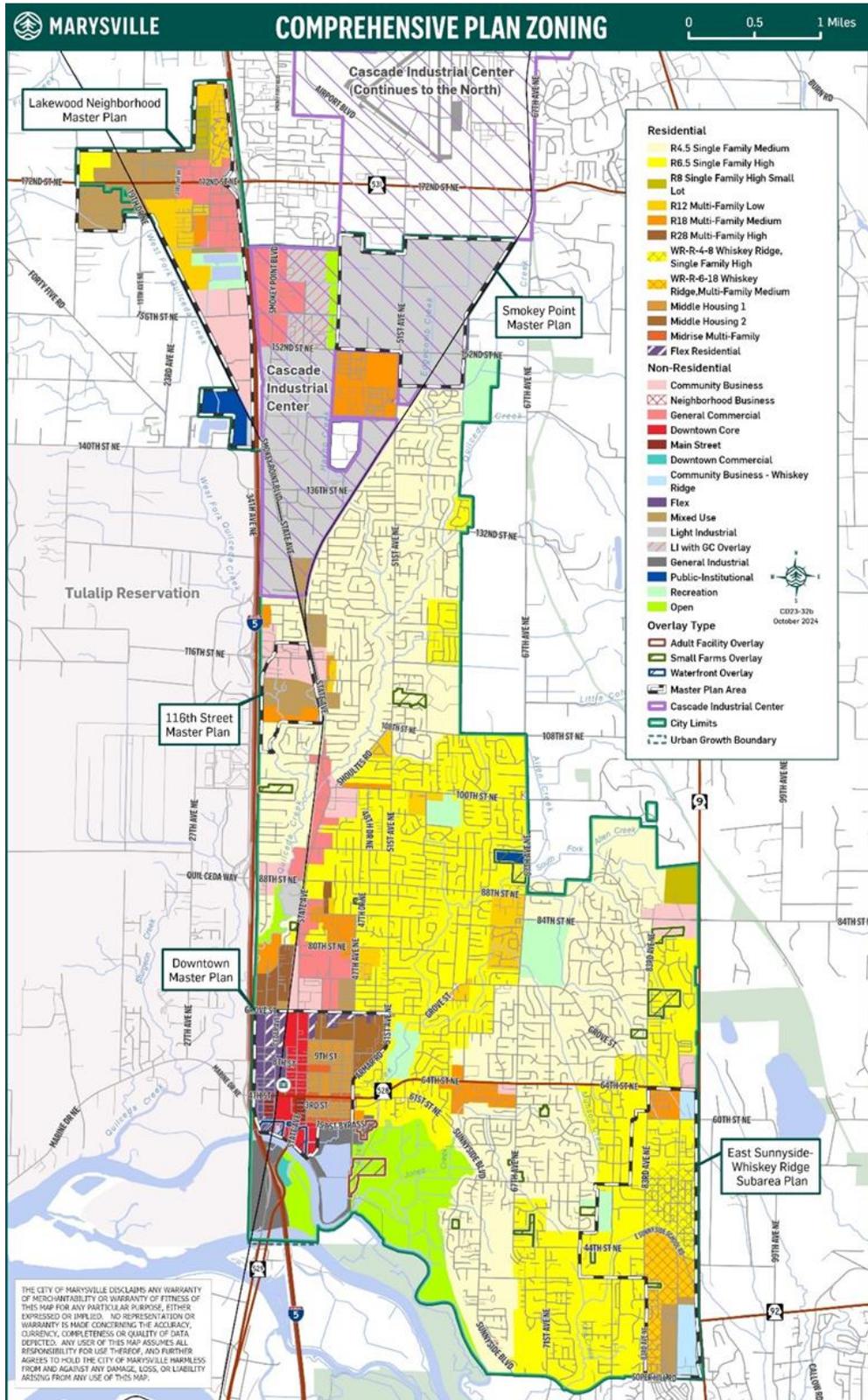
### 1.5.1. No Action Alternative

The No Action Alternative would retain the City's existing Comprehensive Plan land use and zoning designations shown in **Exhibit 1-3**. Since the 2015 Comprehensive Plan update, the primary land use designation and zoning changes occurred with the adoption of the 2021 Downtown Master Plan (DMP), which was amended in 2023<sup>4</sup>. With the 2021 update, the boundaries of the DMP Area were extended north from 8<sup>th</sup> to Grove Street, and east from Alder Avenue to 47<sup>th</sup> Avenue NE/Armar Road/51<sup>st</sup> Avenue NE, increasing the size of the DMP from 182 to 524 acres (see **Exhibit 1-4**). Existing land use and zoning designations within the DMP Area were replaced with seven new zoning designations, which are implemented through a companion form-based code (see [MMC 22C.080 Downtown Master Plan Area – Design Requirements](#)). More limited land use and zoning designation changes have occurred elsewhere in the City since 2015. These land use and zoning designation changes are incorporated into the current (2024) Comprehensive Plan map shown in **Exhibit 1-3**.

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<sup>4</sup> The 2023 Downtown Master Plan (DMP) amendments consisted of redesignating the land that was zoned Flex with a Flex Residential Overlay to a new zone Flex Residential, expanding the DMP boundaries to include the City's Public Works property which is anticipated for redevelopment and re-designating it as Downtown Core, and various amendments to resolve discrepancies between the DMP and the implementing form-based code.

### Exhibit 1-3. Current (2024) Comprehensive Plan Map



Source: City of Marysville, 2024.

Exhibit 1-4. Downtown Master Plan Boundaries – 2009 and 2023



Source: Marysville GIS and Downtown Master Plans – 2009 and 2021 (amended 2023)

In the No Action Alternative, the population, housing, and employment density/intensity assumptions adopted with the 2015 Comprehensive Plan were primarily used. However, the minor modified density/intensity assumptions for the Downtown Neighborhood (outlined in the 2021 Downtown Master Plan update) and the limited zoning changes made elsewhere in the City since 2015 were also incorporated into the capacity shown in the No Action Alternative (see **Exhibit 1-6**).

The 2015 Comprehensive Plan’s growth targets and capacity are provided in **Exhibit 1-5** for reference.

### Exhibit 1-5. 2015 Comprehensive Plan Targets and Capacity

|  | Horizon Year | Employment | Housing | Population |
|--|--------------|------------|---------|------------|
| Growth Target from 2015 Comprehensive Plan | 2035         | 28,113     | 32,936  | 87,798     |
| Capacity from 2015 Comprehensive Plan      | 2035         | 28,113     | 38,027  | 88,628     |

### Exhibit 1-6. No Action 2024 – 2044 Growth

|  | Horizon Year               | Employment          | Housing            | Population |
|--|----------------------------|---------------------|--------------------|------------|
| Existing   | 2019<br>(2020)             | 15,310 <sup>1</sup> | 25,057<br>(25,723) | 70,714     |
| BLR Projected Capacity/Capacity Projected by City with ‘No Action’ Alternative | 2035/<br>2044 <sup>2</sup> | 31,434              | 34,043             | 89,550     |
| City Growth Targets <sup>3</sup>   | 2044                       | 32,926              | 39,976             | 99,822     |
| <b>Capacity Shortfall (between No Action and Growth Targets)</b>               | 2044                       | -1,492              | -5,933             | -10,272    |

<sup>1</sup> Over 99 percent of the City’s UGA has been annexed due to the Central Marysville Annexation, which took effect December 30, 2009 (Ordinance 2792). It should be noted that minor discrepancies exist between SCT figures and City figures due to the GIS files and detailed parcel level adjustments that were necessary to more accurately forecast growth – particularly high growth areas such as the CIC and Lakewood. <sup>2</sup> The capacity in the ‘No Action’ Alternative adopts the 2021 Snohomish County Buildable Lands Report targets given the various changes that have occurred since the 2015 Comprehensive Plan update. The horizon year 2035 applies to the BLR capacity and the horizon year 2044 applies to the ‘No Action’ Alternative. <sup>3</sup>The targets noted in the chart are from the Snohomish County Tomorrow (SCT) planning process and are the City’s growth targets. Based on additional analysis of the City’s density assumptions, there is greater population and employment capacity as noted in the chart; therefore, both the target and capacity are shown.

*Source: 2015 Marysville Comprehensive Plan, Snohomish County 2021 Buildable Lands Report, Snohomish County GIS Files, and Marysville Community Development and GIS Analysis.*

## 1.5.2. Action (Preferred) Alternative

The Action Alternative would also retain the City's existing Comprehensive Plan land use and zoning designations; however, reassesses land use assumptions and growth capacity by evaluating changes within the City since 2015 as well as new or modified State laws and Puget Sound Regional Council (PSRC) objectives. These land use and zoning designations are the same as those shown in **Exhibit 1-3**; however, the map colors assigned to the various zoning designations have been updated.

**City Changes.** Key changes within the City that are incorporated into the Action Alternative assumptions include, but are not limited to:

- Further analysis of the implications of the land use designation changes adopted with the 2021 Downtown Master Plan and the 2023 amendments, including:
  - Redesignation of the City's current Public Works (i.e. Riverwalk) site to allow for redevelopment;
  - Redesignation of lands with Flex with Residential Overlay to Flex Residential;
  - Revision to permitted uses for the Flex zone to allow residential above a ground floor commercial use; and
  - Amendments to density assumptions to reflect observed densities on potential projects and amendments to density assumptions after 2023 amendments to DMP.
- Modified density assumptions for the Mixed Use zone in the Lakewood Neighborhood Master Plan Area to accurately reflect that multi-family residences at high densities are being constructed. Minor modified density assumptions were made to a limited number of other city-wide zones.
- Removing the Market Reduction Factor from lands that have either developed, have land use entitlements, or have a formal land use application filed with the City (from April 2019 through October 2024) as these properties already or will soon be providing further employment or housing capacity within the City. This capacity will still be identified as future capacity since it was not known that these parcels would develop when the 2021 Buildable Lands Report was prepared.
- Construction of various infrastructure improvements that will facilitate growth as well as address existing capacity needs.

**State Law and PSRC Changes.** Key changes in State law or PSRC objectives that are incorporated into the Action Alternative assumptions include, but are not limited to:

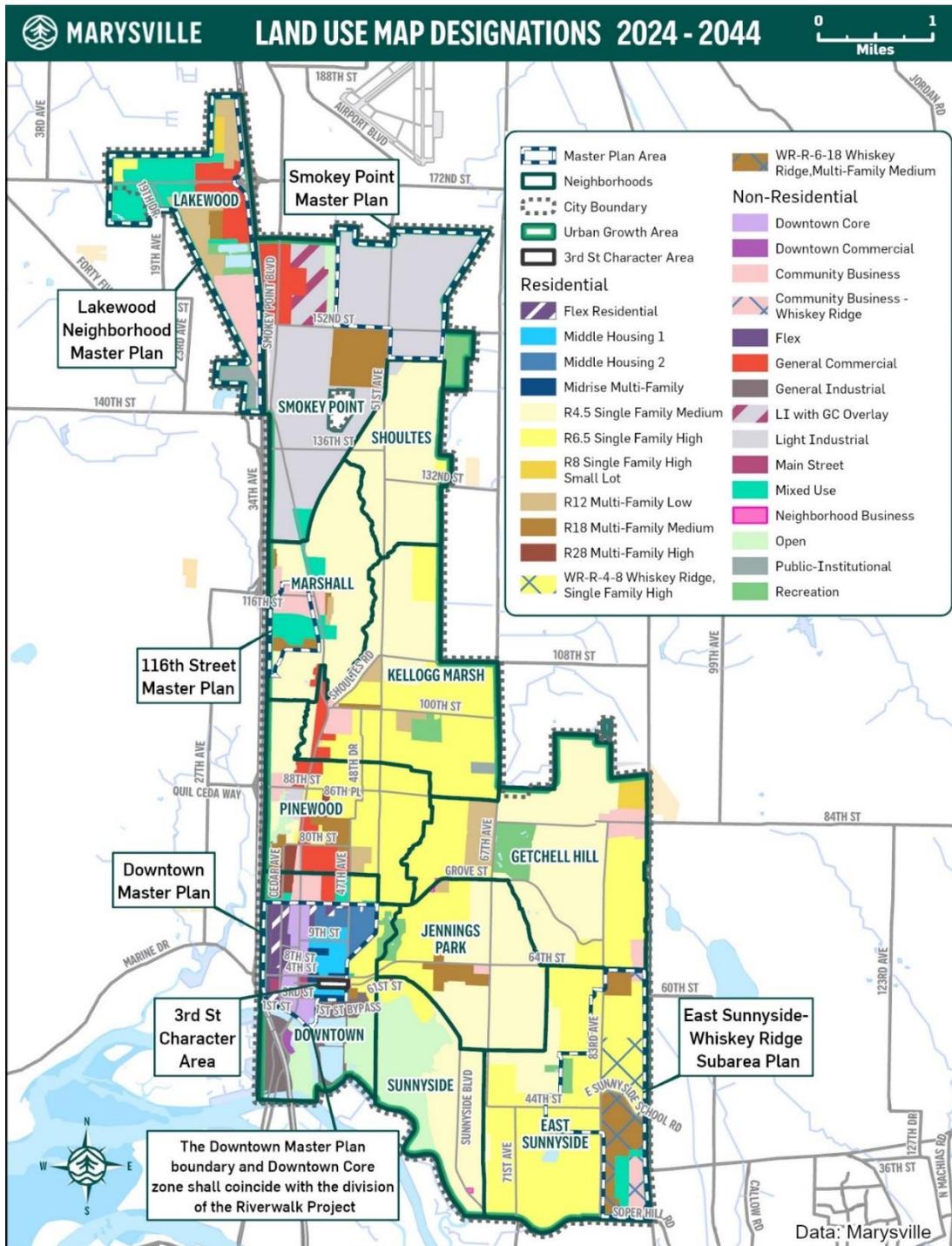
- [E2SHB 1220](#) requiring Housing Elements to include an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth including units for moderate, low, very low, and extremely low income households. This includes planning for emergency and permanent supportive housing. Analyzing racially disparate impacts and addressing equity is also required;
- [E2SHB 1110<sup>5</sup>](#) requiring jurisdictions to allow “missing middle” housing (e.g. duplexes, townhouses, cottages, etc.) in residential zones and multiple dwelling units per lot in zones primarily designated for residential as described further in **Exhibit 1-7**. Projections for additional housing units that may result due to this statute are included within the City’s Land Capacity Analysis.
- [EHB 1337](#) requiring jurisdictions to increase the flexibility of their accessory dwelling unit codes.
- Adoption of Puget Sound Regional Council’s [VISION 2050](#), which includes new employment, housing, and population targets for Puget Sound counties governed by PSRC and a regional Growth Strategy calling for 65 percent of the region’s population and 75 percent of the region’s job growth in Regional Growth Centers and near High-Capacity Transit. The City of Marysville is designated as a High-Capacity Transit community due to Community Transit’s SWIFT Bus Rapid Transit’s Gold Line is expected to be implemented in Marysville by 2029; and
- Adoption of various statutes and plans pertaining to transportation and streets, which address Complete Streets, Multi-modal Level of Service standards, and reducing greenhouse gas emissions (GHG) and vehicle miles traveled (VMT);

Key elements of the alternative are illustrated in **Exhibit 1-6** and zones are described in **Exhibit 1-7**.

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<sup>5</sup> It should be noted that E2SHB 1110 and EHB 1337 are not required to be implemented until six months after the 2024 Comprehensive Plan update, and that more land use and housing related legislation is in the pipeline.

Exhibit 1-7 Action Alternative Zoning: 2044 Comprehensive Plan Map



Source: City of Marysville, 2020.

To implement the Action Alternative in **Exhibit 1-6**, the Action Alternative would continue to implement existing zoning; however, proposes to adopt a Middle Housing Overlay,

which is currently being developed and would apply to all zone primarily designated for residential uses.

See **Exhibit 1-** for a description of the existing zones and the proposed Middle Housing Overlay.

### Exhibit 1-8. Zoning Description

| Zone or Overlay   | Acres (Parcel)                                  | Description  |
|---|---|--|
| <b>Downtown Zones</b>   |   |  |
| <b>Downtown Core</b>  | 106   | The Downtown Core zone encourages high density residential mixed use and office mixed use. Other commercial use and multi-family residences are allowed.   |
| <b>Main Street</b>  | 10  | The Main Street zone protects and enhances the character of Marysville’s historic retail core. This zone encourages high-activity uses like restaurants, entertainment, and shops, with residential above the ground floor. New buildings should feature an active ground floor use. Parking is not required for some uses in small commercial buildings.  |
| <b>Flex</b>   | 38  | The Flex zone encourages a mix of uses, including artisan, workshops, small light manufacturing, commercial, and residential above a ground floor commercial use.  |
| <b>Flex Residential</b>   | 60  | The Flex Residential zone encourages a mix of uses, including artisan, workshops, small light manufacturing, and commercial, and allows “missing middle” housing and low-rise apartments.  |
| <b>Midrise Multi-family</b>   | 25  | The Midrise Multi-family zone encourages dense multi-family housing. Commercial is allowed for properties abutting Third and Fourth Streets, but is limited to a ground floor element of a mixed use building for other properties within this zone.   |
| <b>Middle Housing 1</b>   | 71  | The Middle Housing 1 zone encourages small infill housing, especially “missing middle” housing. The zone protects the fine-grained, residential character of historic neighborhoods.   |
| <b>Middle Housing 2</b>   | 76  | The Middle Housing 2 zone encourages infill housing, especially “missing middle” housing and low-rise apartments. Commercial is not allowed except as a ground floor element of a mixed use building located on an arterial street through the Conditional Use Permit process, and is limited to uses that serve the immediate needs of the neighborhood.  |
| <b>Residential Zones (City-wide)</b>  |   |  |
| <b>Medium Density Single Family (R-4.5), High Density Single Family (R-6.5), and High Density Single Family – Small Lot (R-8)</b> | 6,277 (R-4.5: 3,304; R-6.5: 2,902; and R-8: 71) | The Medium Density Single Family (R-4.5), High Density Single Family (R-6.5), and High Density Single Family – Small Lot (R-8) zones encourage primarily single family residential and duplex development; however, these zones also allow townhouses and other middle housing within Planned Residential Developments, or through the Middle Housing Overlay provisions. <sup>1</sup> The primary distinction among these zones is the allowed density as detailed in the appendices to the Comprehensive Plan. |
| <b>Low Density Multi-family, Medium Density Multi-family, and High Density Multi-family</b>                                       | 785 (R-12: 341; R-18: 389; and R-28: 55)        | Low Density Multi-family (R-12), Medium Density Multi-family (R-18), and High Density Multi-family (R-28) zones encourage multi-family residential, townhouses, and middle housing; however, these zones also allow single family residential and duplexes. Development may pursue middle housing through the City’s standard zoning provisions or through the Middle Housing Overlay provisions. <sup>1</sup> The primary   |

| Zone or Overlay  | Acres (Parcel)             | Description   |
|--|----------------------------|---|
|  |                            | distinction among these zones is the allowed density and height as detailed in the appendices to the Comprehensive Plan.  |
| <b>Middle Housing Overlay</b>  | 10,247 <sup>2</sup>        | The Middle Housing Overlay allows for “missing middle” housing and is currently under development with an implementation by June 2025 consistent with House Bill 1110. The Middle Housing Overlay will apply to all zones that are predominantly residential unless existing land use designations permit higher residential densities. A density of 2 units per lot will be allowed on all lots, unless zoning permits higher densities. A density of 4 units per lot will apply on lots within ¼ mile walking distance of a major transit stop or when one affordable housing unit is provided, unless zoning permits higher densities.   |
| <b>Small Farms Overlay</b>   | N/A                        | Small Farms Overlay is an overlay for agricultural uses in residential zones. The intent is to register small farms in order to confer official recognition of them, encourage their continuation (as long as desired by the property owner), and promote good neighbor relations between existing single family residences and small farms. The Small Farm Overlay is implemented through MMC Chapter 22C.050, <i>Small Farms Overlay Zone</i> , which includes mitigation measures to ensure the compatibility of small farms with adjacent residential uses. New small farms must be 100,000 square feet (2.3 acres) in size; however, existing small farms may be smaller. Small farms may pursue horticulture, floriculture, animal husbandry, and similar uses. |
| <sup>1</sup> See ‘Middle Housing Overlay’ provisions in this section for details.  |                            |   |
| <sup>2</sup> The 10,247 acres is the aggregate acreage of the land use designations/zones that are anticipated to be subject to the Middle Housing Overlay provisions. These zones include: Medium Density Single Family (R-4.5), High Density Single Family (R-6.5), High Density Single Family – Small Lot (R-8), Low Density Multi-family, Medium Density Multi-family, High Density Multi-family, Whiskey Ridge – High Density Single Family, and Whiskey Ridge – Medium Density Multi-family. |                            |   |
| <b>Residential Zones (East Sunnyside-Whiskey Ridge)</b>  |                            |   |
| <b>Whiskey Ridge – High Density Single Family</b>  | 136                        | The Whiskey Ridge, High Density Single Family (WR-R-4-8) zone encourages primarily single family residential and duplex development; however, this zone also allows for townhouses and other middle housing within Planned Residential Developments, or through the Middle Housing Overlay provisions. <sup>3</sup>   |
| <b>Whiskey Ridge – Medium Density Multi-family</b>   | 147                        | Whiskey Ridge, Medium Density Multi-family zone encourages multi-family residential, townhouses, and middle housing; however, these zones also allow single family residential and duplexes. Development may pursue middle housing through the City’s standard zoning provisions or through the Middle Housing Overlay provisions. <sup>3</sup>   |
| <sup>3</sup> See ‘Middle Housing Overlay’ provisions in the ‘Residential Zones (City-wide)’ section above for details.   |                            |   |
| <b>Commercial Zones</b>  |                            |   |
| <b>General Commercial</b>  | 416                        | The General Commercial zone encourages the broadest mix of commercial, wholesale, service and recreation/cultural uses with compatible storage and fabrication uses, serving regional market areas and offering significant employment.   |
| <b>Community Business and Community Business – Whiskey Ridge</b>   | 474 (CB: 401; CB – WR: 73) | The Community Business and Community Business – Whiskey Ridge zones provide convenience and comparison retail and personal services for local service areas which exceed the daily convenience needs of adjacent neighborhoods but which cannot be served conveniently by larger activity centers, and provides retail and personal services in locations within activity centers that are not appropriate for extensive outdoor storage or auto-related and industrial uses.   |

| Zone or Overlay  | Acres (Parcel) | Description   |
|--|----------------|---|
| <b>Neighborhood Business</b>   | 7              | The Neighborhood Business zone provides convenient daily retail and personal services for a limited service area and minimizes impacts of commercial activities on nearby properties.   |
| <b>Mixed Use (including Mixed Use within the East Sunnyside – Whiskey Ridge Subarea)</b> | 323            | The Mixed Use zone provides for pedestrian- and transit-oriented high-density employment uses together with limited complementary retail and higher density residential development in locations within activity centers where the full range of commercial activities is not desirable.  |
| <b>Light Industrial</b>  | 1,293          | The Light Industrial zone provides for the location and grouping of non- nuisance generating industrial enterprises and activities involving manufacturing, assembly, fabrication, processing, bulk handling and storage, research facilities, warehousing and limited retail uses. This zone is intended to protect the industrial land base for industrial economic development and employment opportunities.   |
| <b>Light Industrial with General Commercial Overlay</b>                                  | 123            | The Light Industrial with General Commercial Overlay zone provides for the location and grouping of non- nuisance generating industrial enterprises and activities involving manufacturing, assembly, fabrication, processing, bulk handling and storage, research facilities, and warehousing along with the broadest mix of commercial, wholesale, service and recreation/cultural uses. This zone is intended as a transitional zone between Light Industrial and General Commercial areas that allows the market to determine whether industrial or commercial uses are the highest and best use of the site. |
| <b>General Industrial</b>  | 175            | The General Industrial zone provides for the location and grouping of non- nuisance generating industrial enterprises and activities involving manufacturing, assembly, fabrication, processing, bulk handling and storage, research facilities, warehousing and heavy trucking equipment but also for commercial uses having special impacts. This zone is intended to protect the industrial land base for industrial economic development and employment opportunities.  |
| <b>Other Designations</b>  |                |   |
| <b>Public – Institutional</b>  | 74             | The Public-Institutional zone allows for government buildings, churches, and public facilities.   |
| <b>Recreation</b>  | 336            | The Recreation zone establishes areas appropriate for public and private recreational uses. Recreation would permit passive as well as active recreational uses such as sports fields, ball courts, golf courses, and waterfront recreation, but not hunting. This zone also permits some resource land uses related to agriculture and fish and wildlife management.   |
| <b>Open</b>  | 548            | The Open designation applies to properties that are completely, or significantly, encumbered by critical areas, most notably the Qwuloolt Estuary and associated floodplain, and certain lands adjacent to Quil Ceda and Hayho Creeks.  |

Source: Marysville Community Development and GIS 2024.

## Growth

Comparing to the Snohomish County buildable land model, growth in the Action Alternative is anticipated beyond the No Action Alternative as shown in **Exhibit 1-8**.

## Exhibit 1-9. Comparison of Growth between Action and No Action Alternatives

Sources: City of Marysville Land Capacity Analysis

|   | Horizon Year | Employment | Housing | Population |
|---|--------------|------------|---------|------------|
| Capacity Projected by City with 'No Action' Alternative         | 2044         | 31,434     | 34,043  | 89,550     |
| Capacity Projected by City with 'Action' Alternative            | 2044         | 34,331     | 40,557  | 101,158    |
| <b>Difference between 'Action' and 'No Action' Alternatives</b> | 2044         | +2,897     | +6,514  | +11,608    |

## Exhibit 1-10. Action Alternative Growth and Comparison to City Growth Targets

Sources: City of Marysville Land Capacity Analysis

|  | Horizon Year | Employment | Housing | Population |
|--|--------------|------------|---------|------------|
| Capacity Projected by City with 'Action' Alternative             | 2044         | 34,331     | 40,557  | 101,158    |
| City Growth Targets <sup>2</sup>                                 | 2044         | 32,926     | 39,976  | 99,822     |
| <b>Difference between 'Action' Alternative and Growth Target</b> | 2044         | +1,405     | +581    | +1,336     |

### 1.5.3. SWIFT Alternative

The SWIFT Alternative contemplates land use designation changes in future nodes at key intersections along State Avenue/Smokey Point Boulevard in anticipation of Community Transit's SWIFT Bus Rapid Transit service being extended to Marysville and Arlington by 2027 – 2029; the route, which will serve Marysville and Arlington, is known as the 'Gold Line'.<sup>6</sup> In the SWIFT Alternative, the land use and zoning designations would be the same as those discussed in Section 1.5.2 'Action Alternative' and depicted in **Exhibit 1-6** except that land use and zoning designation changes would occur at the nodes defined by the intersections of State Avenue/Smokey Point Boulevard and:

- Grove Street<sup>7</sup>;

<sup>6</sup> Bus Rapid Transit is designed to move people quickly between destinations and is most successful when it is surrounded by higher residential densities, robust job centers, and other destinations.

<sup>7</sup> In this alternative, zoning changes are only contemplated for the ½ mile radius to the north of the intersection of Grove Street and State Avenue since the Downtown Master Plan update resulted in zoning changes for the south half of this intersection.

- 80<sup>th</sup> or 84<sup>th</sup> Street NE;
- 100<sup>th</sup> Street NE; and
- 116<sup>th</sup> Street NE.

Two scenarios contemplating additional density along State Avenue were considered Option 1 (**Exhibit 1-10**) and Option 2 (**Exhibit 1-11**). These scenarios dust off many aspects of the unadopted State Avenue Subarea Plan (SASP), evaluating additional density at the above-referenced nodes; however, amend the boundaries of the areas where zoning changes were proposed in the unadopted SASP to better reflect local conditions. Options 1 and 2, are the same proposal except at the intersection of State Avenue and 80<sup>th</sup>/84<sup>th</sup> Street NE where Option 1 contemplates land use designation changes for a broader area (see **Exhibits 1-10 and 1-11**).

The unadopted SASP proposed allowing horizontal mixed use<sup>8</sup>, and increasing the allowed density to 50 dwelling units per acre in the impacted commercial zones (i.e. Community Business (CB), General Commercial (GC), and Mixed Use (MU) zones). Under the SWIFT Alternative discussed in this section, horizontal mixed use would also be allowed; however, given traffic constraints at 88<sup>th</sup> Street NE and 116<sup>th</sup> Street NE, the zoning allowance for each of the nodes/stations (i.e. Grove, 80<sup>th</sup>/84<sup>th</sup>, 100<sup>th</sup>, and 116<sup>th</sup>) would be limited to 34 dwelling units per acre in the impacted commercial zones (i.e. CB, GC, and MU). Lower density would also be proposed so that Downtown is more attractive than State Avenue for redevelopment. Commercial uses would be required to be preserved along State Avenue with multi-family uses allowed to the rear. A preliminary recommendation is for the front 25 percent of properties to have commercial development or vertical mixed use with multi-family being allowed towards the rear of properties. Further research and development of standards would occur before any zoning changes along State Avenue would be implemented.

Preliminary estimates project that 1,062 additional housing units could be achieved if Option 1 were pursued, and 973 additional housing units could be achieved if Option 2 were pursued. Since the existing zoning designations at these nodes are currently quite flexible for commercial uses, additional commercial intensities are not anticipated.

Currently, Community Transit is considering three different alignments/ routes in the City of Marysville for deployment of the 'Gold Line'. Since the ultimate SWIFT route is still being determined, and the City anticipates having adequate residential capacity over the planning period (2024 – 2044) without rezoning land, the SWIFT Alternative is **not** proposed as the Preferred Alternative. However, changing circumstances, which

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<sup>8</sup> The Community Business and General Commercial zones currently only allow residential above a ground floor commercial use except for a limited number of Americans with Disabilities Act (ADA) accessible units located to the rear of buildings. The Mixed Use zone currently allows for vertical and horizontal mixed use development.

include but are not limited to the following, may serve as a catalyst for zoning changes along State Avenue/Smokey Point Boulevard in the future:

- The establishment of the ultimate SWIFT route along State Avenue/Smokey Point Boulevard or a portion of this road;
- Residential growth occurring at a faster than anticipated rate and an associated need for more housing; and
- Direction from the City Council to rezone to catalyze redevelopment.<sup>9</sup>

Should there be a need or desire to rezone along the SWIFT route or State Avenue/Smokey Point Boulevard in the future, changes that may help facilitate additional residential development include, but are not limited to:

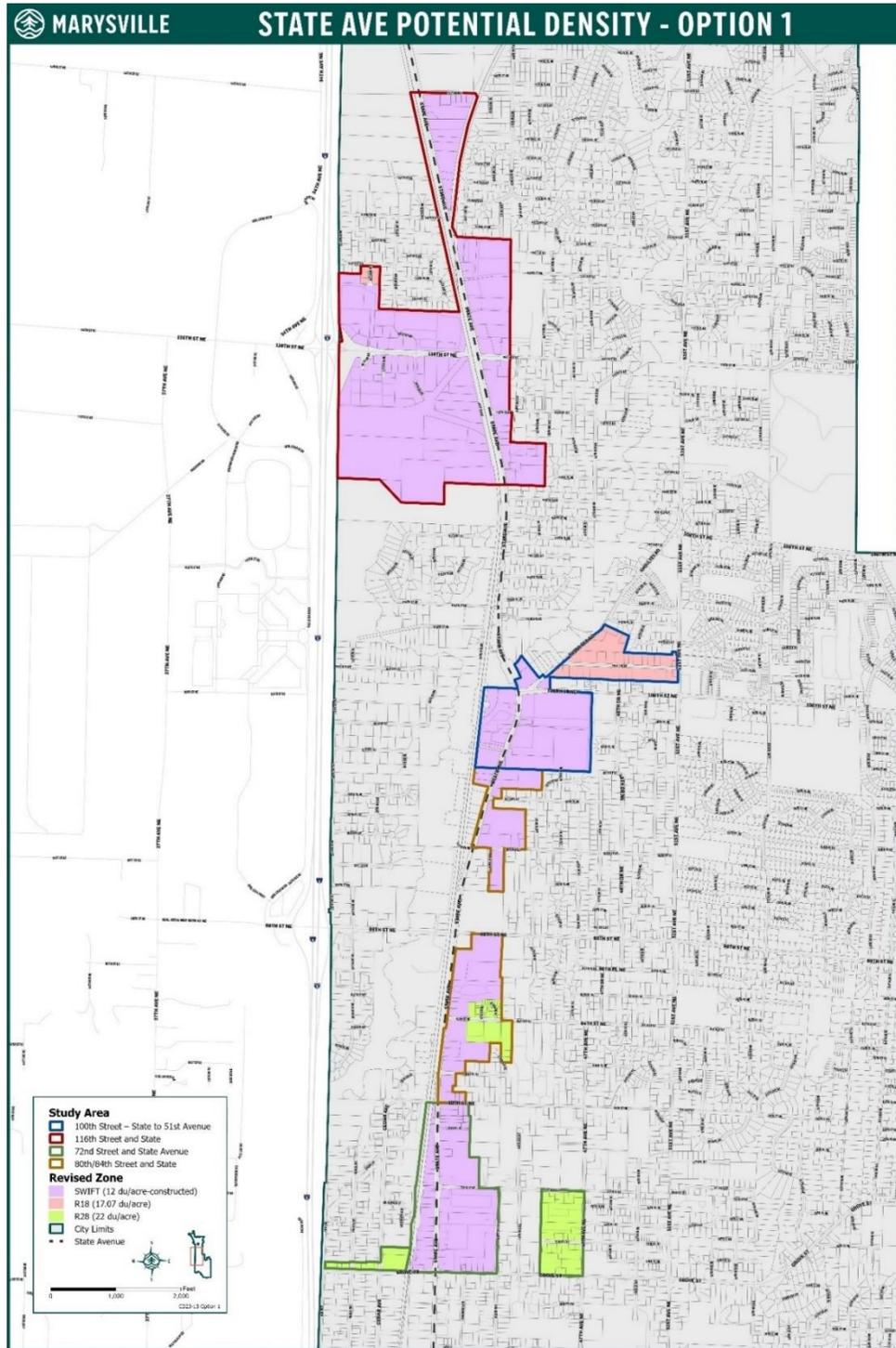
- Modifying setbacks, impervious surface coverage, or parking requirements;
- Allowing stand-alone multi-family residential in commercial zones when located behind a commercial use and/or not along an arterial; and
- Increasing the allowed density or residential density incentives.

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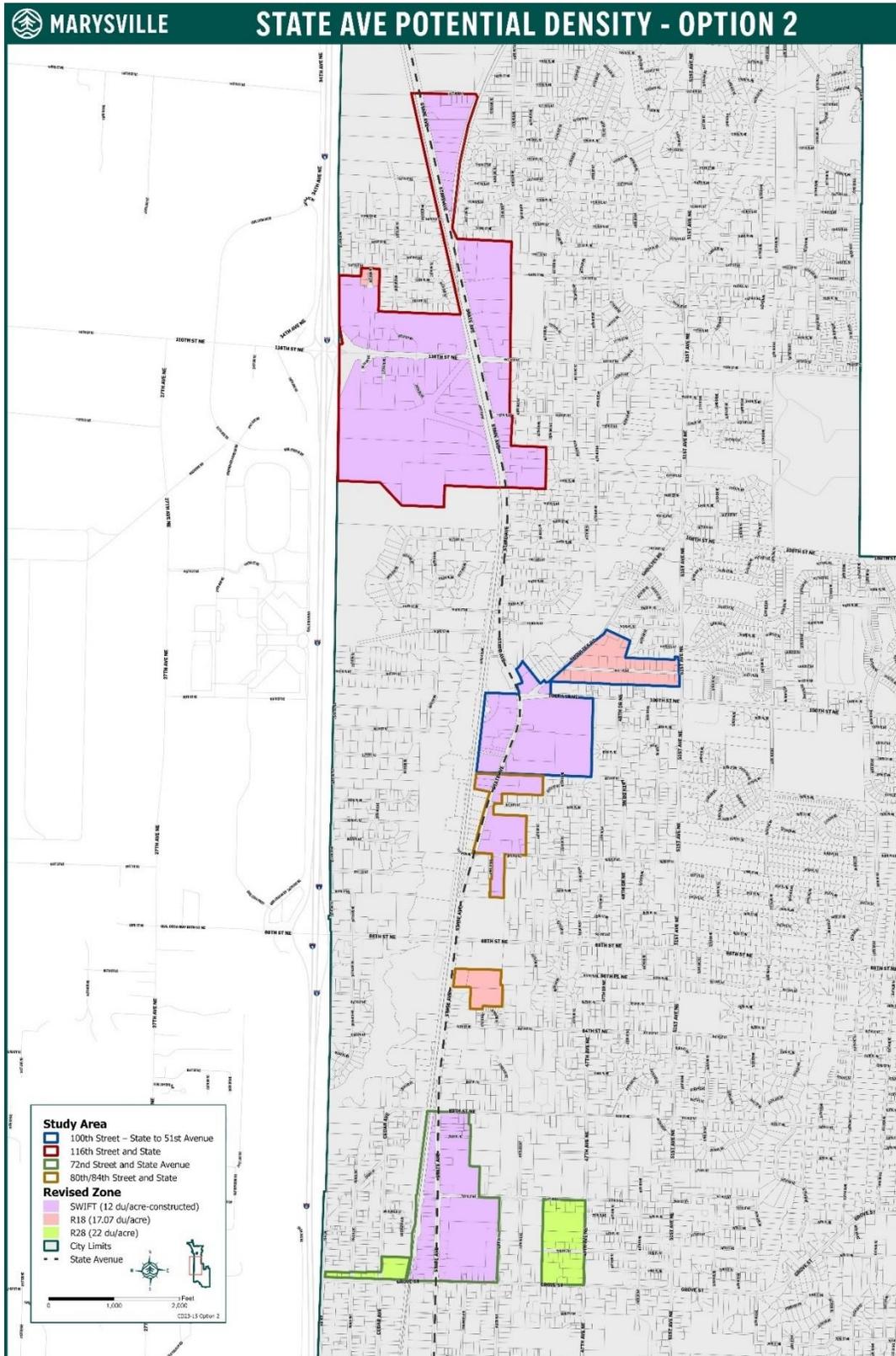
<sup>9</sup> Some reasons that the City may pursue zoning changes along State Avenue in the future include:

- **Spark Redevelopment and Leverage Amenities along State Avenue.** With the existing zoning, minimal redevelopment has occurred along the State Avenue corridor over the past 20 years. Rezoning in the future could spur redevelopment, and also leverage the benefits of being near goods and services, Interstate 5, the Cascade Industrial Center (CIC), pedestrian facilities, and general bus services;
- **Align with Puget Sound Regional Council's (PSRC) Regional Goals.** PSRC's VISION 2050 has a goal for 65 percent of the region's population growth to be within walking distance of high-capacity transit. While this is a regional goal, and individual city goals may differ, future zoning changes would further progress towards this goal; and
- **Additional Capacity for Longer Time Horizon.** As the vacant greenfields in the Lakewood, East Sunnyside-Whiskey Ridge, and other neighborhoods are used, future development is anticipated to shift to infill development and redevelopment of existing underutilized lands throughout the City. There are some large sites Downtown that lend themselves to development; however, redevelopment in many areas will either require aggregating smaller parcels (i.e. significant land acquisition costs) for large development projects, or will be smaller scale, middle housing infill projects.

### Exhibit 1-11. SWIFT Alternative – Option 1

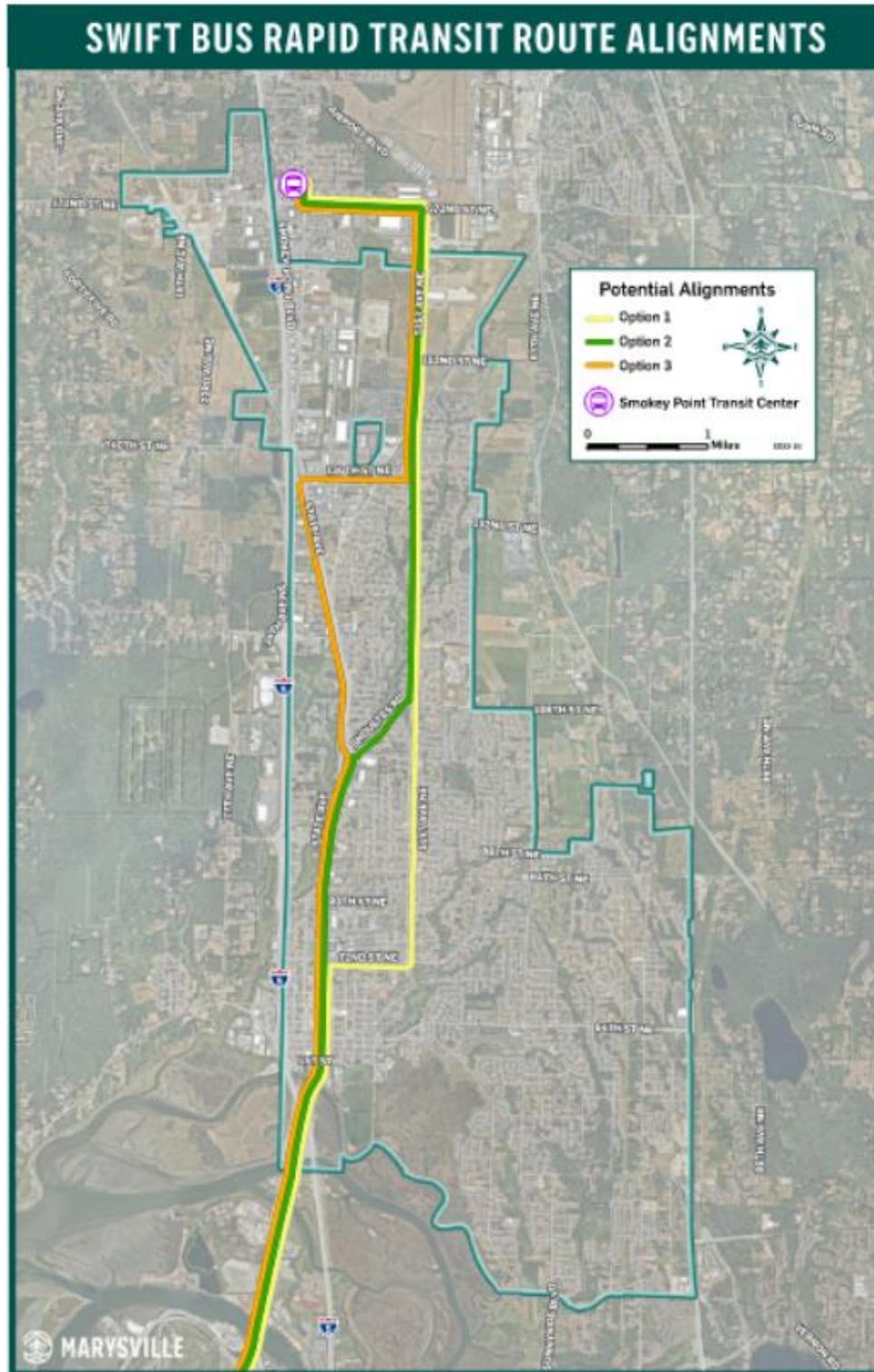


### Exhibit 1-12. SWIFT Alternative – Option 2



### Exhibit 1-13. Potential SWIFT Bus Rapid Transit Route Alignments

Sources: City of Marysville GIS and Community Transit



## Exhibit 1-14. SWIFT Alternative Compared to No Action and Action Alternatives

Source: City of Marysville Land Capacity Analysis

|  | Horizon Year | Employment | Housing | Population |
|--|--------------|------------|---------|------------|
| Capacity Projected by City with 'No Action' Alternative          | 2044         | 31,434     | 34,043  | 89,550     |
| Capacity Projected by City with 'Action' Alternative             | 2044         | 34,331     | 40,557  | 101,158    |
| Capacity Projected by City with 'SWIFT' Alternative <sup>1</sup> | 2044         | 34,331     | 41,619  | 103,807    |
| <b>Difference between 'SWIFT' and 'No Action' Alternative</b>    | 2044         | +2,897     | +7,576  | +14,257    |
| <b>Difference between 'SWIFT' and 'Action' Alternative</b>       | 2044         | 0          | +1,062  | +2,649     |

<sup>1</sup> The 1,062 additional housing units from SWIFT Alternative Option 1 have been added to the 'Action' Alternative figures.

## 1.6. Key Issues and Options

The key issues facing decision makers include:

- Approval of the 2024 Comprehensive Plan Update including revised growth targets, transportation improvement projects, and goals and policies.
- Whether to pursue the Action Alternative or SWIFT Alternative. It should be noted that the SWIFT Alternative is not recommended at this time due to the ultimate alignment of the future SWIFT route still pending.
- Consideration of minor Unified Development Code amendments to ensure consistency with the updated Comprehensive Plan.

## 1.7. Summary of Impacts and Mitigation Measures

### 1.7.1. Land and Shoreline Use and Aesthetics

#### How did we analyze Land and Shoreline Use and Aesthetics?

The SEIS reports current land use patterns using Snohomish County 2021 Buildable Lands Report and Snohomish County Assessor data. It also considers land use

designations/zoning designations and calculates future growth for each alternative based on land capacity. In the Action and SWIFT Alternatives, proposed land use policies are the same.

### **What impacts did we identify?**

Under the Action and SWIFT Alternatives, there will be consistency with State and Regional Plans by focusing growth in an urban center with investments in transportation. The SWIFT Alternative would ultimately be more consistent given the PSRC regional goal of having 65 percent of the region's growth within walking distance of high-capacity transit; however, pursuing zoning changes to accommodate the future Community Transit SWIFT Bus Rapid Transit is premature given that the ultimate route is still being determined. The No Action Alternative would be least consistent with State and Regional Plans due to allocated growth targets not being met (i.e. capacity shortfalls).

All alternatives would result in increased development intensity city-wide with the greatest increase in employment in the Smokey Point Neighborhood, and the greatest increase in housing units and population in the East Sunnyside-Whiskey Ridge, Downtown, and Lakewood neighborhoods. In the SWIFT Alternative, greater housing unit and population intensities would occur along State Avenue/Smokey Point Boulevard than in the other alternatives. This would likely result in some housing unit and population increases in the Pinewood, Kellogg Marsh, Marshall, Shoultes, and Smokey Point Neighborhoods than would be observed in the No Action and Action Alternatives. In each alternative, continued business and job growth is expected in the Smokey Point Neighborhood (i.e. Marysville portion of the Cascade Industrial Center); redevelopment is expected Downtown and along the Waterfront (subject to Shoreline Master Program provisions); and mixed-use and higher intensity development is expected to occur (however, transit-oriented development would be most successful under the SWIFT Alternative).

### **What is different between the alternatives?**

- Growth Pattern and Goals: Both the Action Alternative and SWIFT Alternative would result in increased housing densities and building intensities beyond the No Action Alternative. While the density values applied to residential zones throughout the City are largely the same in all three alternatives, the Action and SWIFT Alternatives contemplate modified density assumptions for the new zones in the Downtown Master Plan Area and greater density in the Mixed Use zone in the Lakewood Neighborhood to reflect existing development patterns. Both the Action and SWIFT Alternatives would also allow for a greater diversity of housing types through a Middle Housing Overlay which allows developers to pursue "missing middle" housing (e.g. duplexes, townhouses, cottages, etc.) in residential zones and multiple dwellings per lot as required by HB 1110, resulting in greater residential capacity. While both the Action and SWIFT Alternatives

would encourage more density near transit investment, the SWIFT Alternative would further this goal by allowing for increased residential densities and horizontal mixed-use development (instead of requiring vertical mixed-use development) in the different SWIFT bus rapid transit nodes depicted in **Exhibits 1 -10 and 1-11**. Both the Action and SWIFT Alternatives further compliance with State and regional plan and facilitate the City meeting its growth targets. While the SWIFT Alternative would most further compliance with State and regional plans, the zoning changes that would accompany that alternative are premature to make given that the ultimate SWIFT route is still being determined as shown in **Exhibit 1-12**.

- **Missing Middle Housing:** Under the Action Alternative and SWIFT Alternative, more missing middle housing/small-scale residential (townhouse, duplex/multiplex) is expected in zones primarily intended for residential throughout the City consistent with the intent of HB 1110. This may result in modest changes to the appearance of residential streets and build a greater sense of liveliness with more people using the sidewalks and streets. A potential negative impact could include degradation of the relatively people-oriented residential streets with some missing middle redevelopment. If current parking and access requirements continue (20' for fire and extensive turning radii), existing residential street fronts could become more auto-oriented in their appearance and function than they are today. A potential negative impact may also occur if reduced setbacks are established resulting in setbacks varying widely, and the sense of a cohesive street wall degrading. Also, if setbacks become too narrow without design consideration for adequate privacy, residents may feel less comfortable using their space facing the street.
- **Heights:** In the Action and SWIFT Alternatives, there would be an increase in height from 45 to 55 feet in the Downtown's Flex (F) zone, which would not be proposed in the No Action Alternative. While the SWIFT Alternative is not recommended at this time, increased heights would ultimately be proposed and recommended with the SWIFT Alternative.
- **Densities:** In the Action and SWIFT Alternatives, increased densities are contemplated in the Mixed Use zone of the Lakewood Neighborhood and the Downtown Master Plan Neighborhood as described above. The densities in the Mixed Use zone in Lakewood Neighborhood average 20.23 dwelling units per acre, which exceeds the density contemplated in the 2021 Buildable Lands Report for the Mixed Use zone. In 2021, the Downtown Master Plan (DMP) was adopted which expanded the boundaries of the DMP and changed the land use designations for properties within the expanded DMP. The density values from the 2021 DMP have been updated to reflect revised density assumptions for these properties, which are greater than in the No Action Alternative.

- **Housing at All Income Levels:** In the Action and SWIFT Alternatives, capacity for housing at all income levels is provided, including for emergency and permanent supportive housing as required by House Bill 1220. Housing for all residents of Marysville is discussed in general terms in the 2015 Comprehensive Plan/No Action Alternative; however, explicit plans to accommodate housing at all incomes levels is only included in the Action and SWIFT Alternatives.
- **Shoreline Access:** Public access to the Ebey Slough shoreline will continue to improve with development. As the Downtown continues to redevelop with new housing, recreation, and commercial opportunities, connections to the waterfront will be restored. The Qwuloolt Estuary Restoration, other shoreline restoration and enhancement, and the extension of existing trails and pathways, are opportunities to improve Downtown and shoreline access.

### **What are some solutions or mitigation for impacts?**

The City applies Marysville Municipal Code (MMC) [Title 22 Land Use Standards](#) to new development under the No Action Alternative. The Action Alternative builds on existing regulations and will advance them through modest zoning changes and the development of a Middle Housing Overlay to guide new middle housing development consistent with HB 1110. Aspects of the Action Alternative that will serve as mitigation include:

- Promoting human-oriented design in the Downtown Master Plan Area.
- Allowing for a greater variety of housing types in Middle Housing zones Downtown, which provide for a transition from commercial areas to lower intensity residential areas.
- Updating design standards to promote architectural design standards for middle housing that is consistent and compatible in form and scale with established residential areas (but no more restrictive) to promote an aesthetic that complements established residential areas.
- Encouraging housing at different income levels to be distributed throughout the City so that housing for different income levels are well-integrated into the community rather than concentrated in limited areas.
- Incorporating updates to parking and access standards for missing middle housing types to maintain building-to-street relationships and people-oriented design.

### **With mitigation, what is the ultimate outcome?**

The greater intensities and variety of uses expected would not have significant unavoidable adverse impacts when paired with the proposed architectural and site design standards. A minor adverse impact may occur if middle housing development

includes extensive parking and access at the street front, which would degrade the sidewalk experience and streetscape aesthetics and reduce street parking. This could be mitigated with reduced access requirements and considered under mitigation measures.

## 1.7.2. Socioeconomics and Racially Disparate Impacts

### How did we analyze Socioeconomics and Racially Disparate Impacts and Racially Disparate Impacts?

The socioeconomics and racially disparate impact analysis uses federal and state population, housing, job, and demographic data to characterize current conditions. The City also hired a consultant, EConorthwest, who prepared a Housing Action Plan (HAP) and Housing Needs Assessment (HNA), which was finalized in November 2023. The HAP included an analysis of socioeconomic characteristics and racially disparate impacts within Marysville.

### What impacts did we identify?

Impacts identified in the HAP included that:

- Marysville has a substantial number of households that are vulnerable and at risk of displacement, especially in the central corridor along Interstate 5.
- Approximately 56 percent of Marysville residents live in neighborhoods that are not currently at risk of gentrification.
- Homeownership rates among Hispanic, Black, Pacific Islander, and Indian or Alaska native households is under 50 percent, with homeownership among White households at 69 percent and among Asian households at 89 percent.
- Cost-burdening is most significant among Black households, with about 63 percent cost burdened, while 35 percent of White households are cost burdened.

All studied alternatives increase housing and job capacity over existing levels, with the Action Alternative and SWIFT Alternative increasing capacity of housing and jobs over the No Action Alternative. Increasing housing capacity and housing options helps to improve housing affordability; however, redevelopment may occur in areas that are more socioeconomically vulnerable making displacement risk assessment and mitigation strategies particularly important.

### What is different between the alternatives?

The land use pattern among the three alternative is similar except that the Action Alternative and SWIFT Alternatives contemplate greater growth capacity, with more residential capacity in the Lakewood and Downtown Neighborhoods than in the No

Action Alternative. The SWIFT Alternative also contemplates greater residential capacity along the State Avenue/Smokey Point Boulevard corridor.

Under all alternatives there is a risk of displacement of existing housing and jobs as redevelopment occurs, particularly Downtown and the central corridor along Interstate 5. Both the Action Alternative and SWIFT Alternative add development capacity that can help accommodate displaced housing units and employment space. The Action Alternative includes policies and new development codes to avoid displacement and encourage small business retention and housing retention.

### **What are some solutions or mitigation for impacts?**

Existing regulations provide mitigation, including:

- [MMC Title 22 Unified Development Code](#) provides zoning and development standards for residential, commercial, and industrial uses
- [MMC Chapter 3.103 Multifamily Housing Property Tax Exemption](#) incentivizes housing Downtown.
- [MMC Chapter 3.104 Industrial/Manufacturing Property Tax Exemption](#) offers a property tax exemption to incentivize the creation of living wage jobs within the City.
- [MMC Chapter 3.105 Affordable and Supportive Housing Sales Tax Credit Fund](#), identifies funding for acquiring, rehabilitating, or constructing affordable housing, or operations and maintenance costs of new units of affordable or supportive housing, or providing rental assistance to tenants.
- [MMC Chapter 22C.090 Residential Density Incentives](#) allows bonus units to be earned for projects which provided affordable housing including affordable housing for seniors.
- Evaluating displacement risk prior to adopting development regulations to analyze impacts and help mitigate adverse impacts on those that are most vulnerable.

Mitigation to address affordable housing and displacement is built into the Action Alternative through providing adequate land capacity and planning for housing at all income levels, and adopting policies that address displacement and adverse impacts to vulnerable populations.

Other potential mitigation measures could include:

- Amending multifamily tax exemption (MFTE) regulations to modify the thresholds for eligible projects or potentially expanding the MFTE eligible area.

### **With mitigation, what is the ultimate outcome?**

There will be an increase in housing and jobs in the Study Area under all studied alternatives; however, there is greater consideration and capacity to address displacement of housing and jobs in the Action and SWIFT Alternatives. With implementation of mitigation measures including features of the Action Alternative to add a wider range of housing types, address design quality, and encourage living wage jobs, no significant unavoidable adverse impacts are anticipated.

## **1.7.3. Transportation**

### **How did we analyze Transportation?**

Transportation impacts were evaluated as outlined in the Transportation Element of the 2024 Comprehensive Plan update. The Growth Management Act (GMA) requires that the transportation planning horizon be at least ten years in the future; however, the City has selected 2044 as the long-range planning horizon for the Transportation Element. The City's travel forecasting model was updated to support the City's transportation planning efforts. The travel demand model provides a tool for forecasting long-range traffic volumes based on the projected growth in housing and employment and enables different transportation system alternatives to be evaluated. The transportation analysis includes 2044 traffic forecasts using the travel demand model and an evaluation of street system operations, non-motorized (e.g. pedestrian, bicycle, etc.), and transit facilities. All Interstate 5 interchanges within Marysville were also specifically studied to understand impacts using 20-year forecasts to understand interchange impacts. A new requirement with the 2024 update is to establish multi-modal level of service standards in addition to the existing multi-modal level of service standards. Transportation impacts of the Action Alternative and SWIFT Alternative were compared to the No Action Alternative.

### **What impacts did we identify?**

Transportation demands for all modes would increase with either the Action Alternative or SWIFT Alternative compared to the No Action Alternative. Existing and planned transit service and non-motorized facilities accommodate transit use, walking and biking; however, various gaps in the system need to be addressed. As development occurs and transportation improvements are completed, additional motorized, transit and non-motorized facilities would be constructed including SWIFT BRT.

Under the Action Alternative and SWIFT Alternative, the Marysville Travel Demand Model was run to forecast 2044 traffic volumes on areas roadways. Consistent with the existing traffic operations analysis, intersection level of service analysis was performed at study intersections. **Exhibit 14** shows the resulting 2044 Baseline traffic operations.

Based on this analysis, all intersections operate within acceptable motor vehicle Level of Services (LOS) standards except for the following:

- 132<sup>nd</sup> Street NE/51<sup>st</sup> Avenue NE
- 116<sup>th</sup> Street NE/State Avenue
- 88<sup>th</sup> Street NE/State Avenue
- Sunnyside Boulevard /Soper Hill Road/71<sup>st</sup> Avenue NE
- SR9/84<sup>th</sup> Street NE
- SR9/SR92

While the 2044 Baseline Analysis showed some corridors or intersections over capacity, in some cases the solution may not be to expand capacity on that specific corridor. Providing additional capacity along parallel routes may also reduce the travel demands of problematic corridors. With the anticipated Transportation System Plan improvement projects shown in **Exhibit 1-15**, all roadways are expected to meet LOS standards.

All Interstate 5 interchanges with Marysville were also specifically studied and are anticipated to operate at the standard of LOS D or better, assuming several interchanges projects will be completed. Some of these improvements are funded or are expected to be funded in the next few years. Other improvements were considered long-term commitments based on plans and, therefore, were assumed complete by 2044 for the future baseline analyses. The I-5 mainline operations are highly dependent on the land use growth assumptions and policies throughout the region and the State of Washington, and as such are left to regional planning organizations to evaluate. The City of Marysville is consistent with the land use growth allocations and growth policies of the Puget Sound Regional Council.



### **What is different between the alternatives?**

Both the Action Alternative or SWIFT Alternative increase PM peak hour trips compared to the No Action Alternative. As a result of the higher trip generation, it is anticipated that future increases in traffic volumes and delays would be higher with the Action Alternative or SWIFT Alternative compared to the No Action Alternative.

### **What are some solutions or mitigation for impacts?**

The Transportation Element identifies numerous improvements to mitigate transportation impacts as shown in **Exhibit 1-15**, Transportation Improvement Projects. These improvements include, but are not limited to, interchange improvements; widening of streets to add additional travel and turn lanes; intersection improvements including signals and roundabouts; construction of non-motorized connections and improvements including bicycle lanes, shared use paths, sidewalks, trails, and Americans with Disabilities Act (ADA) infrastructure; implementing Intelligent Transportation System improvements and continuing to require access management on key corridors; and coordinating with Community Transit on SWIFT bus rapid transit (BRT) service by 2029.

As development occurs, required frontage improvements would help complete and improve the network and new development would be required to pay traffic impact fees to contribute towards planned improvements including the collection of traffic impact fees for Washington State Department of Transportation (WSDOT) and Snohomish County projects as applicable.

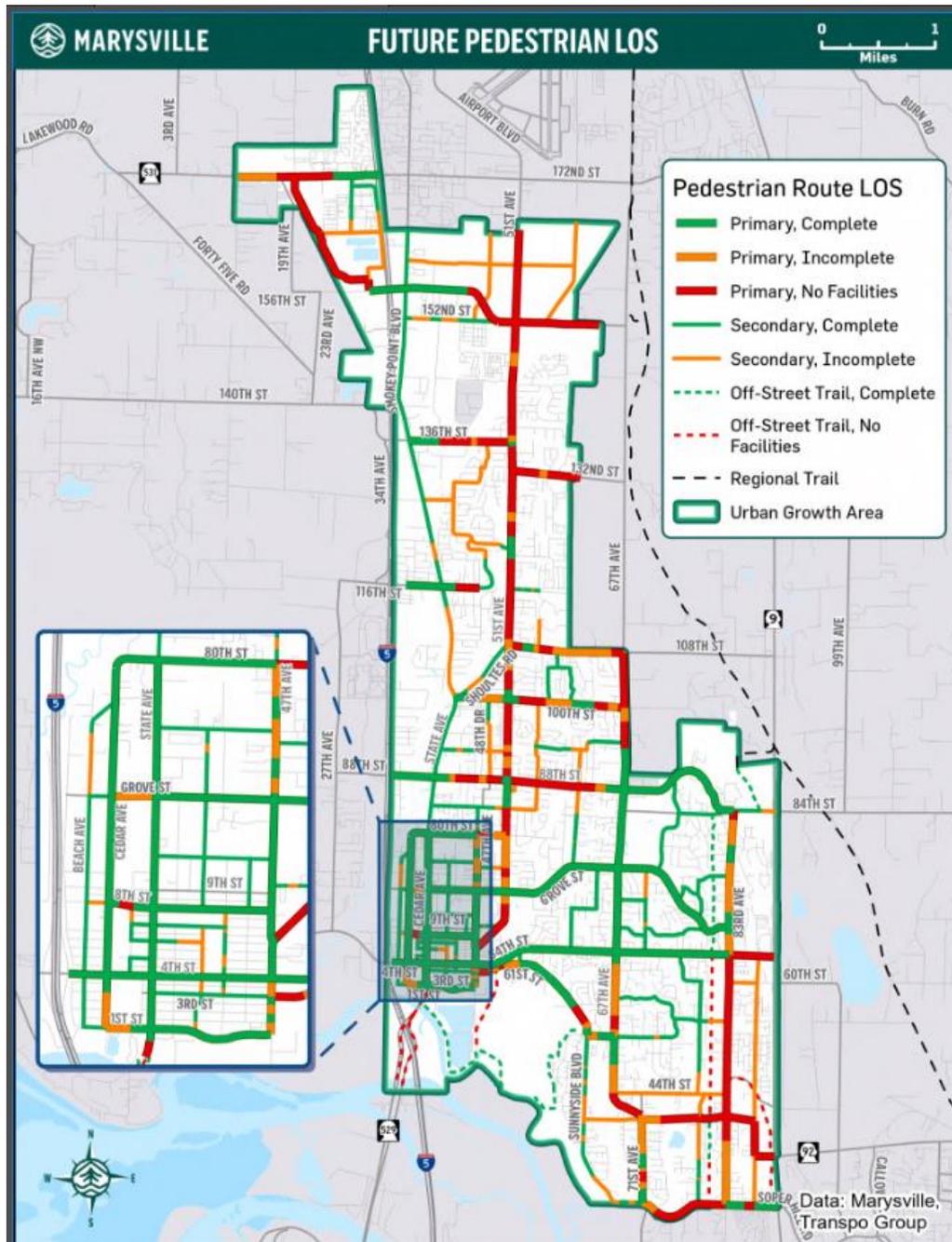
### **With mitigation, what is the ultimate outcome?**

Development under all the alternatives would result in increases in all travel modes – vehicles, transit, pedestrians, and bicycles. Implementation of the projects set forth in the Transportation Element would mitigate the transportation impacts of each of the alternatives and ensure that motorized and non-motorized level of service (LOS) standards are met including for Interstate 5 Interchanges when planned improvements are constructed. Exhibits 1-16 and 1-17 depict the Future Pedestrian and Bicycle LOS standards respectively and are accompanied by a legend indicating what the LOS for pedestrian and bicycle facilities mean.



### Exhibit 1-17. Future Pedestrian LOS

Sources: Transpo Group



| LOS                                      | Primary Route                                  | Secondary Route                                       |
|--|--|---|
| <span style="color: green;">■</span> P2  | Meets City standards, facilities on both sides | Meets City standards, facilities on one or both sides |
| <span style="color: orange;">■</span> P1 | Facilities exist, but only on one side         | N/A   |
| <span style="color: red;">■</span> NF    | No facilities exist, does not meet standards   | No facilities exist, does not meet standards          |



## 1.7.4. Water and Sewer

### How did we analyze Water and Sewer?

The City's 2017 Water Comprehensive Plan (WCP) and 2011 Sewer Comprehensive Plan (SCP) were reviewed and readily accessible records maintained by the City were compiled and screened to identify utility conditions in the Study Area. The City's Action Alternative and SWIFT Alternative growth scenarios were provided to RH2 Engineers who reviewed the alternatives and prepared a Technical Memorandum for Preliminary Water and Sewer System Adequacy Analysis for 2024 Comprehensive Plan. The analysis compared the growth anticipated in the 2017 WCP and 2011 SCP with the growth capacity in the Action Alternative and SWIFT Alternative. Findings indicate sufficient utility infrastructure and capacity to accommodate planned growth in both the Action and SWIFT Alternatives.

### What impacts did we identify?

While both the Action and SWIFT Alternatives will result in employment, housing, and population growth above the No Action Alternative, the projected growth for both the Action and SWIFT Alternatives is approximately 1 to 4 percent lower than the growth presented in the 2017 Water Comprehensive Plan and 2011 Sewer Comprehensive Plan, which are both in the process of being updated. "Accordingly, the Capital Improvement Programs (CIPs) presented in the existing Water and Sewer Comprehensive Plans should provide sufficient capacity until the respective planning years [of 2036 and 2031]; no changes in the priority, schedule, scope, or number of projects in the current water and sewer CIP schedules are recommended by RH2."<sup>10</sup>

### What is different between the alternatives?

There are no significant utility impacts between the alternatives. The City water and sewer utilities have sufficient capacity to accommodate the proposed growth alternatives with the anticipated projects outlined in the respective plans.

### What are some solutions or mitigation for impacts?

Mitigation of impacts primarily centers around implementation of the Capital Improvement Programs (CIPs) established in the 2017 Water Comprehensive Plan and 2011 Sewer Comprehensive Plan, which are both undergoing updates that should be completed in 2025. The City also collects water and sewer capital improvement fees to partially offset the system improvement costs generated by new development. The City

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<sup>10</sup>RH2 Technical Memorandum re. Preliminary Water and Sewer System Adequacy Analysis for 2024 Comprehensive Plan dated August 30, 2024.

will also continue to maintain and sustain the resiliency of the water and sewer systems in the Study Area. Pro-active administrative measures such as planning for increases in maintenance and operations funding to sustain system resiliency should continue.

### **With mitigation, what is the ultimate outcome?**

The ultimate outcome is to provide water and sewer utilities to serve the anticipated growth in the Study Area as well as the City's water and sewer service areas, which extend beyond the Study Area. The ultimate outcome will be safe, efficient, and cost-effective water and sewer utilities.

## **1.7.5. Surface Water**

### **How did we analyze Surface Water?**

The City's 2016 Surface Water Comprehensive Plan, which provides an overview of the major drainage basins and stormwater system within the City, were reviewed. Plans for Low Impact Development (LID) improvements and the benefits of the new Downtown Stormwater Treatment facility were also reviewed.

### **What impacts did we identify?**

Under all alternatives, impervious surfaces installed with development and redevelopment will require the construction of stormwater facilities to manage runoff along with the ongoing need to inspect these facilities. In existing built out areas, groundwater impacts relate principally to construction impacts, illicit discharges to the storm system, and conveyance system failures. Impacts to surface water generally include illicit discharges and impacts of construction along stream and wetlands. The City can, with the support of federal and state agencies, mitigate these impacts through development permit conditions and routine capital maintenance.

Increased employment, housing, and population are expected to increase surface water facility demands. With appropriate regulatory and capital mitigation measures, no significant unavoidable adverse impacts are anticipated.

### **What is different between the alternatives?**

There is no significant difference between the alternatives, although the No Action, Action, and SWIFT Alternatives would all require new stormwater facilities to manage runoff in accordance with the standards set forth in MMC Chapter 14.15 Controlling Storm Water Runoff from New Development, Redevelopment, and Construction Sites. These facilities treat pollutants and slow the rate at which runoff leaves a site, reducing the amount of pollutants entering the City's system, groundwater, and local water

bodies, and minimizing flooding risk. The City will continue with surface water management as part of on-going maintenance and resiliency planning.

### **What are some solutions or mitigation for impacts?**

The City's 2016 Surface Water Comprehensive Plan, which is currently being updated, identifies existing water quality and quantity issues, and includes a Capital Improvement Program (CIP) with recommended improvements and programs, both structural and non-structural, to address water quality and quantity problems.<sup>11</sup> Solutions to improving water quality include the installation of end of pipe treatment such as the Downtown Stormwater Treatment Facility, site specific water quality controls, regional stormwater facilities where appropriate, and increased use of Low Impact Development (LID) techniques to reduce the rate of runoff and improve water quality.<sup>12</sup>

In 2022, a Watershed Planning Basin Assessment was prepared, which analyzes the City's watershed and prioritizes streams that would receive the greatest benefit from stormwater improvements. This was followed by the companion 2023 Watershed Planning Stormwater Action Plan, which identifies stormwater retrofit projects and programs that should be implemented in the prioritized areas<sup>13</sup>. These documents will be used in conjunction with the CIP to pursue future stormwater projects.

The City also holds a National Pollutant Discharge Elimination System (NPDES) Permit, which is a federal permit that regulates stormwater and wastewater discharges to Waters of the State. While this is a federal permit, the regulatory authority has been delegated to the Washington State Department of Ecology (DOE). The first Western Washington Phase II Municipal Stormwater Permit was issued by DOE in January 2007. The City's most recent NPDES permit is active from August 31, 2024 through July 31, 2029. The NPDES Permit requires all affected municipalities to create and implement a

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<sup>11</sup> Structural solutions include construction of capital projects such as stormwater detention and treatment facilities, infiltration facilities, pipelines, and culverts. Non-structural solutions include construction stormwater management facility inspection and maintenance, public education and outreach, water quality monitoring, implementation of best managements practices (BMPs), and regulations encouraging vegetation preservation and low impact development.

<sup>12</sup> The Downtown Stormwater Treatment Facility was completed in 2024 and is a stormwater treatment retrofit facility that will collect and provide water quality treatment for an approximately 463-acre portion of the Downtown. In 2006, regional stormwater facilities were constructed southwest of the intersection of 116<sup>th</sup> Street NE and 41<sup>st</sup> Drive NE to serve the commercial development and road infrastructure between Interstate 5 and State Avenue along 116<sup>th</sup> Street NE in the Marshall-Kruse Neighborhood. Regional Detention Ponds 1 and 2, constructed in 2004 and 2015 respectively, provide flow control and enhanced water quality treatment for approximately 205 acres of high intensity commercial and industrial uses in the Smokey Point Neighborhood.

<sup>13</sup> The NPDES Permit requires this plan to be updated in 2027.

Stormwater Management Program which addresses essential program elements.<sup>14</sup> Select cities, including Marysville, must provide additional actions to address Total Maximum Daily Load (TMDL) requirements.<sup>15</sup> New development and redevelopment in the City must manage their stormwater in accordance with the State Department of Ecology's 2019 Stormwater Management Manual for Western Washington, as amended.

The City also partners with neighboring jurisdictions, tribes, and other entities to advance water quality. The City is a member of the Allen Quilceda Watershed Action Team (AQWA). AQWA is a diverse community group working together to implement the Quilceda Allen Watershed Management Plan to improve the overall quality of streams in the Allen Quilceda Watershed through community outreach and improvements to the environment.<sup>16</sup>

### **With mitigation, what is the ultimate outcome?**

The ultimate outcome is a maintained and ideally improved water quality within the Study Area. There are no significant unavoidable adverse impacts associated with surface water. Development under all the alternatives would result in increased need for surface water facilities and inspection of these facilities. It is anticipated that with proposed mitigation measures the impacts of the Action Alternative would be less than significant.

## **1.7.6. Other Utilities**

### **How did we analyze Other Utilities?**

The City's plans for solid waste management and the plans of other utility purveyors (i.e. PUD, etc.) were reviewed to identify utility conditions in the Study Area. The analysis focused on assessing the general condition and the availability of long-term capacity to

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<sup>14</sup> Required program elements include: Stormwater Planning, Public Education and Outreach, Public Involvement and Participation, MS4 Mapping and Documentation, Illicit Discharge Detection and Elimination, Controlling Runoff from New Development, Redevelopment, and Construction Sites, Stormwater Management for Existing Development, Source Control Program for Existing Development, and Operations and Maintenance.

<sup>15</sup> The City has been collecting ambient water quality monitoring data since about 2000. Most recent water quality data collected by the City is in response to the TMDL requirements in the NPDES Phase II Permit.

<sup>16</sup> AQWA team members include: Adopt-a-Stream, the cities of Arlington and Marysville, the Marysville School District, Snohomish County Conservation District, Snohomish County Surface Water Management, Sound Salmon Solutions, the Tulalip Tribes, and the Washington State Department of Ecology. Team activities include, but are not limited to: the restoration of a section of Jones Creek and the creation of an outdoor environmental education center, community outreach through newsletters targeted at streamside residents, restoration activities such as planting native plants along stream banks, youth education on water quality and its impacts on stream organisms, and Earth Day celebration activities.

accommodate growth in the Study Area. Findings indicate sufficient utility infrastructure and capacity to accommodate planned growth, provided planned improvements are constructed, and on-going maintenance and regulatory compliance standards are maintained.

### **What impacts did we identify?**

Increased employment, housing, and population growth in the Study Areas will increase solid waste management and other utility demands (i.e. electricity). With appropriate regulatory and capital mitigation measures, no significant unavoidable adverse impacts are anticipated.

### **What is different between the alternatives?**

There are no significant utility impacts between the alternatives. The City wastewater, stormwater, and solid waste utilities have sufficient capacity to accommodate the proposed growth alternatives. PUD also projects having adequate capacity.

### **What are some solutions or mitigation for impacts?**

The utility solution is to continue to maintain and sustain the resiliency of the utility systems in the Study Area and hire additional staff, when needed, to address an increase in the demand for solid waste management services. Continuing to route land use applications for private development and City capital projects, together with annual check-ins, will help ensure that non-city utilities can adequately prepare for growth and the demand for additional services in the Study Area.

### **With mitigation, what is the ultimate outcome?**

The ultimate outcome is to provide public utilities (water, wastewater, and solid waste) and ensure implementation of private utility growth that will accommodate the planned growth in the Study Area.

## **1.7.7. Critical Areas**

### **How did we analyze Critical Areas?**

The City reviewed and obtained updated critical areas information from Federal, State, and local agencies, and reviewed its Critical Areas Ordinance. Maps were updated, as necessary, to ensure that they align with current mapping from Federal and State agencies. The City has also contracted with FACET NW (formerly DCG/Watershed) to conduct a review of the City's Critical Areas Ordinance to ensure that it complies with current State law; this review is nearing completion and revisions will occur, as

necessary, in the near future to ensure compliance with State law and Department of Ecology guidance.

### **What impacts did we identify?**

Increased employment, housing, and population growth in the Study Area will increase development and critical area impacts due to increased runoff, impacts of light and glare on wetlands and wildlife, loss of vegetation, and other factors. With implementation of current critical areas standards and mitigation requirements, no significant unavoidable adverse impacts are anticipated.

### **What is different between the alternatives?**

There are no significant difference in critical areas impacts between the alternatives, but the Action Alternative and SWIFT Alternative could both result in greater density and intensity development and, therefore, greater impacts. All alternatives will result in increased development and critical areas impacts; however, critical areas and associated buffers would be afforded the same protection and require compliance with applicable avoidance and mitigation requirements in each of the proposed growth alternatives.

### **What are some solutions or mitigation for impacts?**

The primary solution for mitigation of impacts is to implement the provisions in the City's Shoreline Master Program and Critical Areas Ordinance to ensure that stream, wetlands, steep slopes, and other critical areas and associated buffers are protected and degraded buffers are enhanced. As noted in the response to the first question, the City has also contracted with FACET NW to conduct a review of the City's Critical Areas Ordinance to ensure that it complies with current State law; this review is nearing completion and revisions will occur, as necessary, in the near future to ensure compliance with State law and Department of Ecology guidance.

### **With mitigation, what is the ultimate outcome?**

With mitigation, the ultimate outcome is to ensure that critical areas are permanently protected and degraded critical area buffers are enhanced as development occurs in the Study Area so that the many benefits of open spaces and critical areas (e.g. water quality, flood attenuation, fish and wildlife habitat, etc.) can be retained.

## 1.7.8. Public Services

### How did we analyze Public Services?

To analyze public services, the plans of the various entities and City divisions providing public services were reviewed. Existing conditions were compared with projected growth to identify future needs for public services (e.g. police, fire and emergency services, education, library services, and human services) associated with each of the proposed alternatives.

**Police.** The Marysville Police Department’s Functional Plan (2024 – 2044) was reviewed to evaluate current effective levels of service for police officers and future needs for additional police officers due to growth. The analysis also considered the proximity of police facilities to the population served.

**Fire.** The Marysville Fire District’s staff levels and staff type were reviewed to evaluate current effective levels of service for firefighters, emergency services, and other staff and estimate future needs for additional Marysville Fire District staff needed to address growth. The analysis also considered the proximity of fire protection facilities to the population served.

**Schools.** Three school districts serve students that reside within the City of Marysville: the Marysville School District, Lake Stevens School District, and Lakewood School District. Demand for school services relied on the student population projection rates outlined in the 2024 – 2029 Capital Facilities Plans for the Lake Stevens and Lakewood School Districts, and an Enrollment Forecast Memo prepared for the Marysville School District. Demand for school services were analyzed in terms of the schools within the UGA that would likely receive additional school age children generated by growth in the UGA.

**Parks.** Demand for parks and recreation facilities were analyzed by the projected future need for additional park acreage and trail mileage due to growth based on the City’s parks and recreation LOS standards.

Impacts on public services and utilities would be considered to result in significant impacts under one or more of the following conditions:

- Negatively affect the response times for police and/or fire and emergency medical services.
- Increase demand for special emergency services beyond current operational capabilities of service providers.
- Reduce access to park and open space facilities.
- Result in increases in students and lack of facilities.

### What impacts did we identify?

Under all alternatives, additional population and employment growth would generate a need for additional police, fire and emergency, school, park and recreation, and other public services. For fire and emergency services, growth in the Study Area under both alternatives will generate increased incident call volume and the need to hire more Marysville Police Department and Marysville Fire District staff as described in greater detail below.

**Police.** In order to maintain the existing ratio of staff to citizens, in 2044 it is anticipated that 30 new police officers would be required for the 'Action Alternative' and 35 new police officers would be required for the 'SWIFT Alternative'. If a 'call-per-officer' standard were used, and service levels increase at the same rate as population growth, in 2044 it is anticipated that 61 new police officers would be needed in the 'Action Alternative' and 67 new police officers would be needed in the 'SWIFT Alternative'.

### Exhibit 1-19. Police Staffing Levels – Existing Compared with Action and SWIFT Alternatives

Sources: Marysville Police Department's Functional Plan (2024 – 2044) and City of Marysville Land Capacity Analysis

|                                   | Year or Horizon Year | Commissioned Officers | Custody Officers | Support Staff | Total Staff |
|-----------------------------------|----------------------|-----------------------|------------------|---------------|-------------|
| Current Staffing Levels           | 2024                 | 80                    | 25               | 26            | 131         |
| 'Action Alternative' <sup>1</sup> | 2044                 | 110 – 141             | 45               | 36 – 46       | 191 - 232   |
| 'SWIFT Alternative' <sup>1</sup>  | 2044                 | 115 – 147             | 47               | 38 – 48       | 200 – 242   |

<sup>1</sup> The staff number ranges noted above represent the difference between maintaining existing staff levels relative to population, and increasing staff levels based on the 'call-per-officer standard', which would reduce calls per officer to be more in line with regional averages for call load. **It is important to note that the future staff allocation will ultimately be determined by budgetary considerations and the policy direction selected by City Council.**

**Fire.** The Marysville Fire District provided current 2024 staffing levels by position. In order to maintain the existing ratio of staff to citizens, in 2044 it is anticipated that 29 additional firefighters would be required for the 'Action Alternative' and 31 additional firefighters would be required for the 'SWIFT Alternative'.

## Exhibit 1-20. Fire Staffing Levels – Existing Compared with Action and SWIFT Alternatives

Sources: Marysville Fire District and City of Marysville Land Capacity Analysis

|   |                                   | Year or<br>Horizo<br>n Year | Firefighters | Fire<br>Prevention | Emergency<br>Medical<br>Services | Special<br>Operati<br>ons | Admini<br>stration | Total<br>Staff |
|---|-----------------------------------|-----------------------------|--------------|--------------------|----------------------------------|---------------------------|--------------------|----------------|
| Current<br>Levels <sup>1</sup>  | Staffing                          | 2024                        | 85           | 5                  | 28                               | 5                         | 8                  | 131            |
|   | 'Action Alternative' <sup>2</sup> | 2044                        | 114          | 7                  | 38                               | 7                         | 11                 | 177            |
|   | 'SWIFT Alternative' <sup>2</sup>  | 2044                        | 116          | 7                  | 38                               | 7                         | 11                 | 179            |
| <p><sup>1</sup> In 2024, the Marysville Fire District had 131 staff that consist of eight administrative staff, 28 emergency medical services (EMS), five fire prevention, 83 firefighters (fire suppression), five special operations, and two staff that are currently in training. Staff that are in training were added to the Firefighter category. <sup>2</sup>The staff levels noted in the Action and SWIFT Alternatives represent maintaining existing staff levels relative to population growth and were estimated by City staff based on existing staff levels and staff type. <b>Actual staff levels will be determined by the policy direction selected by the Marysville Fire District and its Board of Directors as future needs arise.</b></p> |                                   |                             |              |                    |                                  |                           |                    |                |

**Schools.** Growth in the Study Area will also generate more school age children.

- Marysville School District.** The Marysville School District’s (MSD) 2023 enrollment is 9,368 students. The MSD’s projected 2033 enrollment is 8,099 students, which represents a 15.7 percent decrease over 2023 enrollment levels. The MSD has been experiencing financial challenges and declining enrollment and is undergoing significant changes and evaluating future facility needs. The Action and SWIFT Alternatives contemplate additional growth. Growth in the City that is outside of the Lakewood and East Sunnyside-Whiskey Ridge Neighborhoods may help stabilize enrollment within the MSD. Growth under the SWIFT Alternative is expected to help stabilize student enrollment modestly more than in the Action Alternative does.
- Lake Stevens School District.** The Lake Stevens School District’s (LSSD) 2023 enrollment is 9,446 students. The LSSD’s projected 2044 enrollment is 11,716, which represents a 24 percent increase over 2023 enrollment levels. Additional elementary, middle, mid-high, and high school classroom space will need to be constructed between now and 2044 as described in the 2024 – 2029 Lake Stevens School District Capital Facilities Plan. Further increases in classroom capacity may need to occur under the Action Alternative; however, the LSSD closely follows growth in its school district, and updates their CFP every two years, so will respond to changing projections as they evolve. The SWIFT Alternative contemplates housing and population increases along State Avenue,

which is in the Marysville School District, so not anticipated to impact Lake Stevens School District enrollment.

- **Lakewood School District.** The Lakewood School District's (LWSD) 2023 enrollment is 2,614 students. The LWSD's projected 2044 enrollment is 3,517, which represents a 34.5 percent increase over 2023 enrollment levels. Additional classroom space will need to be constructed between now and 2044 as noted in the 2024 – 2029 Lake Stevens School District Capital Facilities Plan; however, the CFP is a six-year plan, future growth is speculative and needs beyond 2029 are difficult to determine. Further increases in classroom capacity may need to occur under the Action Alternative; however, the LWSD closely follows growth in its school district, and updates their CFP every two years, so will respond to changing projections as they evolve. The SWIFT Alternative contemplates housing and population increases along State Avenue, which is in the Marysville School District, so is not anticipated to impact Lakewood School District enrollment.

**Parks.** To maintain the City's current LOS standards for park acreage and trail mileage under all alternatives, the City would need to develop and/or acquire more park acreage and trail mileage to serve the new growth generated in the Study Area.

### **What is different between the alternatives?**

The Action Alternative and the SWIFT Alternative would allow for more employment, housing, and population growth than the No Action Alternative. As the City's current or policy-based LOS standards are based on population, demand for public services will be highest under the Action Alternative and SWIFT Alternative and will be lowest under the No Action Alternative.

### **What are some solutions or mitigation for impacts?**

In general, planning for future growth is a way to mitigate the impacts generated by projected population and employment growth.

**Police and Fire.** For police as well as fire and emergency services, the Marysville Police Department (MPD) and Marysville Fire District (MFD) will need to hire additional staff over time to ensure an adequate level of service for the community. The MPD has also evaluated formal, population-based LOS standards for police to consider what alternate staffing levels should potentially be provided. The MFD could also consider this approach for fire and emergency services.

**Schools.** When student population growth results in increased capital facility needs (e.g. schools, supportive buildings, etc.), the City collects school impact fees for new development on behalf of the school districts serving Marysville students to partially offset the system improvement costs of educating additional students generated by new development.

**Parks.** The City collects park impact fees for new development to build or acquire new park and recreation facilities. The Action Alternative also includes investment in parks, and pedestrian and bicycle facilities to connect with trails, parks, and schools within and adjacent to the UGA.

**With mitigation, what is the ultimate outcome?**

All studied alternatives would increase the demand for fire, police, schools, and parks and recreation with the No Action Alternative the least, and the Action and SWIFT Alternatives the most. The difference in the increase between the Action and SWIFT Alternatives is generally modest. With regular capital facility planning and implementation of mitigation measures no significant unavoidable adverse impacts are anticipated.

# 2.0. Responses to Comments and Clarifications

This chapter of the Final Supplemental Environmental Impact Statement (Final SEIS) describes the opportunities for commenting on the 2024 Comprehensive Plan Update and Draft SEIS, followed by the specific comments that were submitted and responses to those specific comments.

## 2.1. Comments and Responses

During the Draft SEIS comment period, written comments were received from the individuals and agencies listed below. The issues raised in each comment letter and a corresponding response are presented in Exhibit 2-1. Full comment letters are included at the end of this chapter.

Comments that state preferences on alternatives or other matters are acknowledged with a response that the comment is noted and forwarded to City decision makers. Comments that address methods, analysis results, mitigation, or other matters are provided a response.

Input received will be considered by the City Council prior to their decision on the proposal.

**Exhibit 2-1. Written comments and response matrix.**

| Letter  | Comment   | Response  |
|---|---|---|
| <b>1</b><br>Kristen Kinnamon<br>November 12, 2024 | <b>COMMENT 1-1</b><br>Comprehensive Plans are mandated by the state, as are the elements and priorities addressed in each plan. In its draft SEIS Marysville describes one purpose of the 2024-44 Comprehensive Plan as "Addressing the various statutes and plans pertaining to transportation and streets, which pertain to Complete Streets, Multi-modal Level of Service standards, and reducing greenhouse gas emissions (GHG) and vehicle miles traveled (VMT)." (Oct. 18 SEIS notice).<br>Unfortunately, this plan fails to address these issues in any substantive way. While the City has made some visible progress in pedestrian and bicycle infrastructure in recent years, these have tended to be disconnected spot treatments. The Comprehensive Plan fails to live up to its name when it comes to pedestrian and bike safety or infrastructure planning. | <b>RESPONSE 1-1</b><br>The Transportation Element in the overall Comprehensive Plan is an abridged version of the Transportation Plan that is intended to provide a concise summary that is streamlined and easier to digest. Various links are provided throughout the Transportation Element to the full Transportation Plan, which should address all required elements of the Washington State Growth Management Act (GMA) RCW 36.70A as well as align with both Puget Sound Regional Council's VISION 2050 as well as Snohomish County's County-wide Planning Policies. These comments are noted and will be provided to City decision makers for consideration. |

| Letter          | Comment  | Response   |
|-----------------|--|--|
|                 | <p><b>A Master Plan for pedestrians and bicyclists is needed to supplement this Comp Plan</b> - and should be included in the upcoming <b>City Budget</b>. Without that, we will never reach this stated goal “The City will have a safe, cleaner, integrated, sustainable, and highly efficient multimodal transportation system that supports the City land use plan and regional growth strategy and promotes economic and environmental vitality and improves public health.” (p. 259)</p>   |  |
| <p><b>1</b></p> | <p><b>COMMENT 1-2</b></p> <p>I am passionate about the need for a healthy, safe community where people are active and comfortable walking, biking and rolling. While I am one of the “confident and fearless” bicyclists who will ride wherever needed to get to my destination, I am also speaking for my neighbors:</p> <ul style="list-style-type: none"> <li>· The family with 4 kids who like to be active outside</li> <li>· The 20-something young man who uses an electric wheelchair - and sidewalks, shoulders or bike lanes to get around</li> <li>· The 70+ year old who jogs (slowly!) around the block</li> <li>· The new people in the apartments off 100th who want to walk to Fred Meyer</li> <li>· The woman with cerebral palsy who takes the bus to work</li> </ul> <p>Pedestrian safety is called out as an issue in the draft plan, but no solutions are offered. “Between 2018 and 2022, there were 79 collisions involving pedestrians and 49 collisions involving bicyclists in Marysville. The largest concentration (34) of these types of collisions occurred along the State Avenue corridor.” (p. 241)</p> | <p><b>RESPONSE 1-2</b></p> <p>Thank you for your perspective on the various community members that use Marysville’s transportation network. Various policies emphasize the importance of safety including:</p> <ul style="list-style-type: none"> <li>· Policy T-3.4: Maintain and improve the safety of the transportation system for all modes.</li> <li>· Policy T-3.6: Support pedestrian and bicyclist education and safety programs such as Safe Routes to Schools and Healthy Communities.</li> <li>· Policy T-3.7: Apply access management practices to arterials to improve safety and operational efficiency of the system.</li> <li>· Policy T-4.3: Coordinate with the railroads and trucking industry to improve the safety and efficiency of freight movement and reduce the impacts on other travel modes. Coordinate planning with railroad capacity expansion plans and support capacity expansion that is compatible with local plans.</li> <li>· Policy T-6.8: Work with PSRC travel demand forecasts to identify state, regional, and local multimodal transportation system improvements deemed necessary to accommodate growth while improving safety and human health.</li> </ul> <p>The data on pedestrian and bicycle collisions help inform the projects outlined on the City’s Transportation Improvement Projects List (see Figure 28 and Table 8 in the full Transportation Plan). Implementing the pedestrian and bicycle system networks shown in the Pedestrian System Plan (see Figure 23 in full Transportation Plan) and Bicycle System Plan (see Figure 25 in full Transportation Plan) will promote greater pedestrian safety as improvements are</p> |

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| 1      | <p><b>COMMENT 1-3</b></p> <p>New <b>level of service standards for pedestrians</b> simply describe primary and secondary corridors and map the presence or absence of sidewalks. State Avenue has sidewalks and is designated as "complete." But it lacks:</p> <ul style="list-style-type: none"> <li>· Intersections with safe crossing opportunities - such as leading pedestrian intervals and protected left turn movements (so the light does not permit left turns when a pedestrian is present)</li> <li>· Access control - consolidated driveways so there are fewer interactions (chances for crashing) between drivers and walkers</li> <li>· Bus shelters for transit users</li> <li>· Speed limits set with safety in mind</li> </ul> | <p>constructed. Implementing the City's adopted ADA Transition Plan (adopted in December 2020) will also further pedestrian safety for those with mobility differences. The City has actively pursued grants for Safe Routes to School to improve walking safety for school children.</p> <p><b>RESPONSE 1-3</b></p> <p>Level of service standards for pedestrians and bicycles is a new State requirement for comprehensive plans. The City's initial level of service (LOS) standards designate primary and secondary network corridors. Primary corridors are routes that are more city-wide or that extend completely through the community, while secondary corridors are those that are supportive of the primary corridor and serve to make the second leg of the journey to connect to destinations, extend into neighborhoods, or complete a loop. The initial pedestrian level of service (LOS) standards focus on the presence or absence of pedestrian facilities. With respect to the deficiencies identified:</p> <ul style="list-style-type: none"> <li>· Implementation of pedestrian safety measures at signalized intersections are evaluated and provided on a case-by-case basis and are consistently evaluated. Leading pedestrian intervals have been implemented at several City intersections in which higher pedestrian volumes are present or at locations with more susceptible pedestrians such as near schools and residential living facilities with high children, elderly or disabled populations. Many locations with leading pedestrian intervals also have left turn signal phasing not currently provided via flashing yellow arrow signal (FYA) displays which allow for much greater flexibility to provide for alterations to signal operations, which can benefit pedestrian safety such as pedestrian actuations altering the FYA display when "walk", "walk &amp; "flashing Don't walk" or full pedestrian clearance interval are active. These features are evaluated and implemented as necessary to maintain signalized intersection safety for all roadway users.</li> <li>· Access management provisions including standards for consolidating driveways are set forth in the Chapter 3 of the City's Engineering Design and Development Standards (EDDS), specifically sections 3-301 Arterial Access Standard and 3-302</li> </ul> |

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|                 |  | <ul style="list-style-type: none"> <li>· Non-Arterial Access Standards. These standards are applied with new developments, redevelopment, and capital improvement projects as appropriate.</li> <li>· Bus shelters for transit users are provided by Community Transit; however, the City provides comments to CT whenever afforded the opportunity.</li> <li>· While one of the latest trends in the Traffic Engineering toolbox has become the ideals that lowering of speed limits is effective to reduce speeds and collisions, the available documented engineering studies on the subject have not indicated results different from studies performed decades ago. The only difference appears to be the conclusions of the writer. Lowering of speed limits has a negligible effect on actual driver speeds with some documented roadway speeds being reduced by up to 2 mph and others actually increasing by up to 2 mph. The only streets which lowering of speed limits seems to have resulted in a greater effect is within the downtown cores of very dense urban environments such as downtown Seattle, Boston or New York. For typical urban, suburban and rural locations, lowering of a speed limit by 5 mph for a roadway established based upon an 85% vehicle speed which might be 2-3 mph over the posted speed limit only provides for the establishment of a speed trap which would be consistently necessary to achieve the desired effect. Additionally, most available engineering studies that evaluate speed limit reduction effects, do not evaluate the actual effect on collision rate or severity but only conclude arbitrarily that collision rates and severity must also decline thus provide for greater pedestrian and bicycle safety. Speed limits within the City of Marysville should continue to be evaluated on a street-by-street basis with alterations of roadways also investigated whenever a speed limit reduction is evaluated to determine the likely effectiveness without requiring constant police enforcement actions.</li> </ul> |
| <p><b>1</b></p> | <p><b>COMMENT 1-4</b><br/>                     The 2024 Capital Improvement Program proposes converting 3 intersections on State /</p> | <p><b>RESPONSE 1-4</b><br/>                     The proposed improvements identified on Figure 28 Transportation Improvement</p>  |

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|                 | <p>Smokey Point Blvd to allow left turns on flashing yellow arrows. If any of these now have a protected left turn movement - where pedestrians can cross without competing with left turners - this "improvement" will actually reduce safety and increase vulnerability. (see NCHRP 926: Improving Safety at Intersections)</p>  | <p>Projects and Table 8 of the full Transportation Plan are intended to address vehicular collision rates/safety history and are funded through related safety grants.</p>  |
| <p><b>1</b></p> | <p><b>COMMENT 1-5</b></p> <p>Marysville will never solve its problem of lacking and disconnected sidewalks throughout the City without LOS standards and concurrency requirements that incentivize either new development or the City itself to make sidewalk connections beyond the frontage of new housing. As new people and new cars are added to our City, intermittent sidewalks and safety treatments are not enough to keep pedestrian LOS and safety from being reduced.</p>            | <p><b>RESPONSE 1-5</b></p> <p>The pedestrian and bicycle level of service standards are intended to address the presence or absence of these facilities on designated pedestrian and bicycle corridors. Typically the City can only require frontage improvements (i.e. curb, gutter, sidewalk, road widening, etc.) along existing or planned roadways abutting a project's frontage. However, the City also actively pursues grants to improve pedestrian and bicycle facilities and safety particularly near schools and other key destinations.</p>   |
| <p><b>1</b></p> | <p><b>COMMENT 1-6</b></p> <p>The City needs a comprehensive approach to identifying and funding priority pedestrian improvements that connect schools, commercial areas and existing sidewalks.</p>  | <p><b>RESPONSE 1-6</b></p> <p>The full Transportation Plan includes a comprehensive approach to identifying and funding priority pedestrian improvements that connect schools, commercial areas, and existing sidewalks. However, it should be noted that improvements will occur over time according to a project's priority and available funding.</p>  |
| <p><b>1</b></p> | <p><b>COMMENT 1-7</b></p> <p>The City has also demonstrated the need for an updated Bicycle Master Plan. The 2024 Comp Plan is both inaccurate and inadequate in its description and plan for bike infrastructure. Worst, is the proposed Level of Service standard that both secondary and primary bikeways be adequate only for a "higher level of stress." That means people like me will bike, but not grandmas to the grocery store, kids to school, or middle-aged moms going to yoga.</p> | <p><b>RESPONSE 1-7</b></p> <p>The Transportation Element that is part of the overall Comprehensive Plan is an abridged version that should be treated as an Executive Summary. The full Transportation Plan shows prioritized bicycle routes, including locations where multi-use trails along roadways and bicycle lanes would be constructed (see Figure 23). Where shared use paths are provided to meet pedestrian and bicycle needs, the City's EDDS standard plans require landscape strips separating the facilities from travel lanes. Other comments are noted and will be provided to City decision makers.</p> |
| <p><b>1</b></p> | <p><b>COMMENT 1-8</b></p> <p>The City will not reduce Vehicle Miles Traveled, Greenhouse Gas Emissions or achieve Complete Streets goals with this plan.</p>   | <p><b>RESPONSE 1-8</b></p> <p>Comment is noted and will be provided to City decision makers.</p>  |

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| 1      | <p><b>COMMENT 1-9</b></p> <p>Research has confirmed that only low stress - often separated - bike facilities will encourage more people of all ages to bike. The proposed LOS basically allows the City to continue on its current path of vastly short-changing bike improvements for citizens overall.</p>   | <p><b>RESPONSE 1-9</b></p> <p>The City's EDDS standard plans require landscape strips separating shared use paths from travel lanes. Shared use paths are the preferred pedestrian/bicycle facility proposed in areas where new roads will be built (i.e. the East Sunnyside-Whiskey Ridge, Smokey Point, and Lakewood Neighborhoods). Other comments are noted and will be provided to City decision makers.</p>   |
| 1      | <p><b>COMMENT 1-10</b></p> <p>The map of the Bicycle System Plan (p. 253) shows the bike route on 88th Street ending at 51st Avenue - with no connection to the transit service and commercial destinations on State Avenue.</p>   | <p><b>RESPONSE 1-10</b></p> <p>Although 88<sup>th</sup> Street's bike route does not extend to State Avenue due to long-term physical constraints east of State Avenue, fifteen (15) other east-west primary and secondary routes are designated and planned between 51<sup>st</sup> Avenue and the existing bus services along the State Avenue Corridor.</p>  |
| 1      | <p><b>COMMENT 1-11</b></p> <p>On page 237, 51st Avenue is shown as being a bike facility with shoulders. However, the shoulder width can be as narrow as 1 foot (a very high stress, substandard width) - despite a recent road project in the section south of Shoultes School and despite decades of the road being designated as a future bike corridor.</p>  | <p><b>RESPONSE 1-11</b></p> <p>Exhibit 1-18 Future Bicycle LOS indicates that 51<sup>st</sup> Avenue NE is designated as a primary bicycle route; however, only the portion that is south of 88<sup>th</sup> Street NE has been deemed complete. The section from 88<sup>th</sup> Street NE to 152<sup>nd</sup> Street NE is currently deemed incomplete, while the section from 152<sup>nd</sup> Street NE to the City limits currently lacks facilities. Future improvements are needed to complete this bicycle corridor. Comment is noted and will be provided to City decision makers and Public Works staff for review and consideration.</p> |
| 1      | <p><b>COMMENT 1-12</b></p> <p>Without more clear goals and expectations for improved biking and walking, Marysville has failed to deliver on its past multimodal transportation plans.</p> <p>For example, the <b>2015 Transportation Plan</b> called for 64th Avenue NE and 70th Street between the YMCA and Grove Elementary School to be a future "bikeway." That road was resurfaced in 2024, and did receive full-width speed humps for traffic calming (not ideal for bicyclists). It did not have any bike infrastructure added. The travel lanes remain wider than 14 feet and the parking lanes are also extra wide - encouraging rather than discouraging speed in this residential neighborhood.</p> <p>The <b>2015 Transportation Plan</b> designates 60th Avenue NE connecting Grove to 88th Street as a priority pedestrian corridor. The street did receive</p> | <p><b>RESPONSE 1-12</b></p> <p>Thank you for the link to the reference materials. Comment is noted and will be provided to City decision makers and Public Works staff for review and consideration.</p>  |

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|                 | <p>valuable traffic calming and re-striping that added a wide, walkable shoulder on the east side. However, that shoulder ends in the final block rather than continuing to Grove Street - ROW space is dedicated instead to vehicle parking on the west side of the road.</p> <p>On 80th Street, new bike lanes were added. But two successive intersections have different treatments for the right turn lane. In one block, the bike lane is between the through lane and the right turn lane. In the next block, the bike lane is inside the turn lane. Such inconsistency makes one suspect there is no one paying attention to designing bike infrastructure that meets national standards (such as <a href="#">Urban Bikeway Design from the National Assoc. Of City Transportation Officials</a>)</p> <p>The missteps make it clear to me that more defined and enforceable standards are needed for Marysville to make progress on multimodal mobility.</p>   |   |
| <p><b>1</b></p> | <p><b>COMMENT 1-13</b></p> <p><b>The Transportation Element of the Comp Plan</b> makes no reference to the City’s current <a href="#">Complete Streets Policy</a>, adopted in 2016. Perhaps because no one follows it? The policy needs an update to meet national models for transparency and implementation elements (see <a href="#">Smart Growth America</a>, and <a href="#">MSRC</a> resources). Clearly, many exceptions to Complete Street designs have been made as Marysville grows. Those are supposed to be approved by the Public Works Director. A model policy would add that those exceptions should be posted for public comment before approval.</p> <p>As it is, both the Complete Streets policy and the adopted 2015 Transportation Plan have failed to have sufficient influence on street plans and projects since they were adopted. I fear the same will happen with this Comp Plan as written. To address these concerns, <b>a Master Plan for Biking and Walking should address both policy and implementation based on current national standards.</b></p> | <p><b>RESPONSE 1-13</b></p> <p>Policy T-3.3 directs the City to approach all transportation improvements with a Complete Streets approach. This approach is specified by the City. Other comments are noted and will be provided to City decision makers.</p> |
| <p><b>1</b></p> | <p><b>COMMENT 1-14</b></p> <p><b>A few housekeeping items in the Comp Plan</b> should also be addressed before adoption. Transit: the plan was written before a planned, major redesign of Community Transit’s service. It should be updated to accurately describe the</p>  | <p><b>RESPONSE 1-14</b></p> <p>The full Transportation Plan notes in various places that Community Transit’s (CT) service would be changed in Fall 2024. The Transportation Plan was prepared prior to these CT’s changes being implemented. The</p>          |

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|  | <p>current service - for instance, new bus routes that serve Lynnwood instead of Seattle, and the existing local bus service on State Avenue that operates at 15 minute frequencies to Everett and Lynnwood throughout the day.</p> <p><b>A more comprehensive look at transit service and needs</b> would also call out the lack of bus shelters or other stop amenities such as lighting, sidewalk access and safe crosswalks.</p> | <p>summary of CT services should be viewed as a point-in-time and to provide a general summary of their services.</p>   |
| <p><b>1</b></p>  | <p><b>COMMENT 1-15</b></p> <p><b>Public input</b> was sought and is summarized in "Voices from the Community" sidebars throughout the plan. These quotes are interesting - and anecdotal? Some footnotes and an appendix should outline the source of the "voices" - how many people responded to surveys or participated in outreach? The results of the City's public participation process should be outlined in the plan.</p>    | <p><b>RESPONSE 1-15</b></p> <p>Various surveys were conducted throughout the Comprehensive Plan update. Most of the 'Voices from the Community' summaries are based on responses to specific questions that were asked which had a variety of different responses which could be selected. Free form questions were also asked and anecdotal responses provided, but those responses have a more limited presence in the Voices from the Community sections as the aim was to convey overarching themes expressed by more community members. A broad overview of public participation is provided on page 15 of the Comprehensive Plan. The various surveys which were conducted and survey responses are outlined and linked in the downloadable 'Project Chronology' on the 'Project History' tab of the Comprehensive Plan update webpage (<a href="#">City of Marysville Comprehensive Plan Update</a>). Most surveys should also identify the number of responses received. Thank you for the suggestions.</p> |
| <p><b>2</b></p> <p>Kathy Johnson<br/>November 18, 2024</p> | <p><b>COMMENT 2-1</b></p> <p>I've read a lot of Environmental Impact Statements but never saw one like this! Where is the discussion of the plan's effects on ESA-listed species, wildlife, water quality, soils, etc.?</p>  | <p><b>RESPONSE 2-1</b></p> <p>The environmental document for the 2024 Comprehensive Plan Update is a Supplemental Environmental Impact Statement (SEIS). This document builds off of the Marysville Integrated 2005 Comprehensive Plan and Development Regulations Final Environmental Impact Statement (EIS) issued April 6, 2005 and associated Draft EIS dated January 13, 2005; the Marysville Downtown Master Plan Final SEIS issued October 9, 2009 and associated Draft SEIS dated July 20, 2009; and the Marysville Downtown Master Plan Final SEIS issued September 2021 and associated Draft SEIS dated February 23, 2021. The intent of the SEIS for the 2024 Comprehensive Plan Update is to cover effects of the Plan that were not previously covered by the prior documents. The 2024 Comprehensive Plan and proposed land use pattern is a</p>  |

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|                 |   | <p>substantial continuation of the 2005 and 2015 Comprehensive Plan. Comprehensive Plan map amendments are limited to those needed to ensure consistency with the currently adopted Zoning Map. The major changes to the Comprehensive Plan are primarily to address changes in State law (i.e. Middle Housing, multi-modal level of service standards, etc.). Consequently, the discussion on the critical areas, wildlife, etc. items noted is more limited as it was previously addressed in the 2005 EIS and the land use pattern is largely the same. It should be noted that the City has contracted with FACET NW which is currently reviewing the City’s Critical Areas Ordinance to ensure that it complies with State law. Findings to-date are that the City’s CAO is substantially consistent. An update of the City’s CAO will be completed by the end of 2025 to ensure compliance with State law.</p>  |
| <p><b>2</b></p> | <p><b>COMMENT 2-2</b></p> <p>Beyond that, I am very concerned about the proposal to build housing and businesses on the waterfront. This is a liquefaction zone and subject to sea level rising and flooding. Building here – especially building homes – would endanger human lives and result in enormous costs to the municipal and federal governments (and hence taxpayers) and property owners. Adding structures here would also increase runoff and adversely affect water quality and wildlife. On the other hand, restoring natural vegetation and wetlands in this area would ameliorate these effects while simultaneously providing wildlife habitat and beautiful amenities to foster public health, including mental health.</p> <p>Waterfront development would be counter to the following goals and policies from the Comprehensive Plan.</p> <p><b>Goal EN 3</b> Design and build developments in a manner that respects and retains ecosystem services, natural elements, vegetation and critical areas, with emphasis on streams, creeks and other bodies of water; and on wetlands, and steep slopes</p> <p><b>Policy EN 0.13</b> Protect, restore and/or enhance natural systems, critical areas, hydrological functions and water quality, including restoring shorelines and estuaries, removing fish-blocking culverts, reducing use of toxic products, and retrofitting basins to manage stormwater.</p> | <p><b>RESPONSE 2-2</b></p> <p>Thank you for your comments. The various city-owned properties along Ebey Slough are mapped as a moderate to high liquefaction risk. Most of Marysville is mapped as a low to moderate liquefaction risk. Most of the various city-owned properties have been zoned for commercial and/or industrial uses for several decades with the majority currently zoned commercial.</p> <p>To mitigate liquefaction risk, a geotechnical report will be required to evaluate any future development proposal, and any future buildings or structures will be required to be designed under the then-current (i.e. adopted) International Building Code, Chapter 16, and Structural Design Requirements. The seismic zone criteria for any building or structure must be established under the guidelines of a Washington State Licensed Architect and/or Structural Engineer. Special inspections will be required as determined necessary by the Engineer of Record.</p> <p>Any proposal will be required to comply with all applicable Shoreline Master Program and Critical Areas Ordinance requirements. Properties along Ebey Slough located east of Interstate 5 and south of First Street have a High Intensity shoreline designation. Any development located within 200 feet of the Ordinary High Water Mark (OHWM) of Ebey Slough will require that a Shoreline Substantial Development Permit be obtained. A 70-foot setback from the OHWM will be</p> |

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|  | <p><b>Goal EN 18</b> Account for climate change impacts when planning, siting, designing, and operating capital facility, utility, and infrastructure projects.</p> <p><b>Policy EN 0.56</b> Discourage construction in designated flood hazard areas, and prohibit it in floodway areas. Developments in designated flood hazard areas shall be adequately flood-proofed.</p>   | <p>required for non-water oriented commercial, recreational, and multi-family uses. A minimum 50-foot strip of shoreline restoration and/or native plantings will need to be installed along Ebey Slough, which will enhance a currently degraded buffer. Mixed Use development as part of master planned marinas or water-dependent recreation facilities providing public access to the shoreline may have a reduced 40 foot setback with a 40 foot enhanced vegetative buffer.</p> <p>It is also anticipated that the properties will be removed from the floodplain through site fill; the portion of the properties that may be developed in the future are not in designated floodways.</p> <p>All runoff will be subject to water quality standards pursuant to the 2019 Stormwater Management Manual for Western Washington, as amended. Many of the parcels abutting Ebey Slough are in a flow control exempt area and will be subject to water quality requirements; however, will be able to provide direct discharge to Ebey Slough to preserve the immediate hydrology.</p> |
| <p><b>2</b></p>  | <p><b>COMMENT 2-3</b></p> <p>Regarding the transportation element, the planning for bicycle routes is woefully inadequate. We need connections between the short, sporadic designated bike lanes that exist in the city. Nowhere in the city are bike lanes separated from traffic. And such lanes are particularly needed on State Avenue to Smokey Point; expecting bicyclists to travel out of their way to 51<sup>st</sup> Avenue for north-south travel is unreasonable. Many automobile trips could be eliminated if people felt safe bicycling on Marysville’s streets. Planning that encourages bicycle use would reduce air pollution and improve the health of citizens.</p> | <p><b>RESPONSE 2-3</b></p> <p>The Transportation Element that is part of the overall Comprehensive Plan is an abridged version that should be treated as an Executive Summary. The full Transportation Plan shows prioritized bicycle routes, including locations where multi-use trails along roadways and bicycle lanes would be constructed (see Figure 23). Where shared use paths are provided to meet pedestrian and bicycle needs, the City’s EDDS standard plans require landscape strips separating the facilities from travel lanes. Other comments are noted and will be provided to City decision makers and Public Works staff for consideration.</p>   |
| <p><b>3</b></p> <p>Russell Joe,<br/>Snohomish<br/>County<br/>Government<br/>Affairs<br/>Manager</p> <p>Master<br/>Builders<br/>Association of<br/>King and</p> | <p><b>COMMENT 3-1</b></p> <p><b>Action Alternative</b></p> <p>MBAKS applauds Marysville’s recognition that additional residential capacity of over 13,000 new units may be necessary to align with the regional policies for concentrating growth over the next twenty years. MBAKS recognizes the thoughtful planning that was devoted to the analysis of all the growth scenarios in Draft SEIS. MBAKS supports the work that Marysville has done to reach its preferred choice.</p>   | <p><b>RESPONSE 3-1</b></p> <p>These comments are noted and will be provided to City decision makers.</p>   |

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| <p>Snohomish Counties<br/>November 18, 2024</p> | <p>MBAKS supports the city of Marysville recommended action alternative which largely retains the City’s existing Comprehensive Plan land use and zoning designation. However, as noted the alternative does reassess land use assumptions and growth capacity by evaluating changes within the city since 2015 and updates to state law. This option best fulfills <u>Strategy 1</u> from the Marysville Housing Action Plan to <b>Increase Housing Diversity to Expand Rental and Homeownership Opportunities for a Wider Range of Households</b> (also see Middle Housing section below).</p> <p>Moreover, the city has shown flexibility in its planning by keeping the option open of additional infill and density along the SWIFT route as Community Transit finalizes its plans. The flexibility and forethought for this scenario will pay dividends as new growth along this major corridor may become a reality. Finally, this flexibility in the plan will enable the city of Marysville to fulfill <u>Housing Action Plan 1.1</u>, to <b>Increase Residential Density Along Future Transit Lines</b>.</p>   |  |
| <p><b>3</b></p>                                 | <p><b>COMMENT 3-2</b></p> <p><b>Permitting and Regulation</b></p> <p>MBAKS recognizes the Plan is important for protecting the incredible Puget Sound environment, while planning for and updating options and opportunities residents have regarding where they live, work, and play. We want to ensure policymakers remember that new and revised elements within a comprehensive plan often come along with unintended direct, or indirect, added costs to provide housing.</p> <p>For example, MBAKS appreciates the recent work the Planning Commission and staff completed on November 12th to analyze the proposed implementation of SB 5290’s new requirements (MMC Chapter 22G.010 and .020 under review). MBAKS stands ready to work with the city of Marysville and other stakeholders to further the goal of reducing permit timelines, lowering permit fees, and increasing efficiency.</p> <p>However, MBAKS would like to see in the Plan more provisions that recognize Marysville’s role in providing attainable housing and a variety of housing types for all economic segments of the community; that encourage the city to work actively with the building industry</p> | <p><b>RESPONSE 3-2</b></p> <p>As the City continues its legislative work to address new State requirements, consideration will be given to whether further policy changes that are needed to promote alignment between the City’s Comprehensive Plan and development regulations. Staff also endeavors to consider the economic implications of proposed policy and development regulation amendments. These comments are also noted and will be provided to City decision makers.</p> |

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|                 | <p>to meet our housing needs; and that encourage permit reform consistent with new and existing state law. We support adding language to any provision that clarifies the goal expressed should not result in increased permit fees and permit timelines. Adhering to the provisions of this new law would help address a key barrier to facilitating more housing choices.</p>  |   |
| <p><b>3</b></p> | <p><b>COMMENT 3-3</b></p> <p><b>Housing</b></p> <p>❖ <u>Accessory Dwelling Units:</u><br/>           MBAKS supports policies to promote and enable the development of accessory dwelling units (ADUs). MBAKS supports consideration of additional policy support for ADUs consistent with new state legislation HB 1337. In 2022 the city of Marysville last examined its ADU provisions. MBAKS would urge a re-examination in 2025 to evaluate whether additional policy support would be advantageous for residents and the city, as it works to provide greater flexibility for ADUs.</p> <p>MBAKS supports the additional adoption of provisions, including:</p> <ul style="list-style-type: none"> <li>· Allow Detached ADUs of at least one thousand square feet.</li> <li>· Set impact fees below 50% for ADUs.</li> <li>· Priority permitting for ADUs.</li> <li>· Developing pre-approve form plans.</li> <li>· Removing off-street parking requirements.</li> </ul> <p>❖ <u>Middle Housing:</u><br/>           It is our understanding Marysville will wait to address the new Middle Housing requirements until 2025. However, including a reference to the "Middle Housing Overlay" provisions in the Plan is an encouraging step. By the inclusion of the overlay in the Comprehensive Plan Update the city is providing continuity in administering future zoning regulations. Housing production to maximize options and incentivize development and supply of middle housing is essential to accommodate the additional anticipated housing units adopted under the Plan. In addition, this will create diverse housing options for community members, access to services and transit, and encourage a better job-housing balance.</p> <p>MBAKS encourages the City's inclusion of future Middle Housing proposals that would:</p> | <p><b>RESPONSE 3-3</b></p> <p>Thank you for your suggestions. As noted, the City will be updating its development regulations by June 2025 to ensure compliance with HB 1110 (Middle Housing statute), HB 1337 (accessory dwelling units), and other State statutes. The development regulations will be amended to comply with State law. Additional amendments will be based on the policy direction selected by City Council and Planning Commission after briefing and consultation with City staff at public meetings. The City will also be conducting public outreach to obtain community input on HB 1110. These comments are also noted and will be provided to decision makers.</p> |

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|   | <ul style="list-style-type: none"> <li>· Allow outright duplex, triplex, and fourplex multifamily developments in all residential zones.</li> <li>· Allow building heights to thirty-five feet in lower-density zones, to support compatible development with existing neighborhoods.</li> <li>· Reduce landscaping and on-site recreation requirements, and reduce parking requirements, to incentivize development of the middle housing types and improve affordability.</li> </ul>  |  |
| <p><b>4</b></p> <p>Jeff Storrar,<br/>WSDOT<br/>Management<br/>of Mobility<br/>Policy<br/>Manager</p> <p>Washington<br/>State<br/>Department of<br/>Transportation</p> | <p><b>COMMENT 4-1</b></p> <p>WSDOT appreciates the challenges local jurisdictions face with accommodating housing and job growth. We understand that intensifying development can place stress on existing transportation facilities, including impacts on I-5 and its interchanges. We were unable to find any analysis or discussion of the impacts to I-5 in the draft EIS. Therefore, WSDOT recommends that, per the requirements of RCW 36.70A.070(6), the EIS include additional information on this topic. In addition, if the city is planning to utilize SB 5412 in the future to streamline housing development, consultation with WSDOT is required. As outlined in SB 5412 the city “must document its consultation with the department of transportation on impacts to state-owned transportation facilities including consideration of whether mitigation is necessary for impacts to transportation facilities.”</p> | <p><b>RESPONSE 4-1</b></p> <p>Section 1.7.3, Transportation, of the SEIS has been updated to address WSDOT’s comment and incorporates the following information: For the recently updated Transportation Element analysis, all I-5 interchanges within Marysville were specifically studied to understand impacts. Future 20-year forecasts were used to understand interchange impacts and all interchanges were anticipated to operate at the standard of LOS D or better, assuming several interchanges projects will be completed. Some of these improvements are funded or are expected to be funded in the next few years. Other improvements were considered long-term commitments based on plans and, therefore, were assumed complete by 2044 for the future baseline analyses. The I-5 mainline operations are highly dependent on the land use growth assumptions and policies throughout the region and the State of Washington, and as such are left to regional planning organizations to evaluate. The City of Marysville is consistent with the land use growth allocations and growth policies of the Puget Sound Regional Council.</p> |
| <p><b>4</b></p>   | <p><b>COMMENT 4-2</b></p> <p>WSDOT is pleased with the city’s focus on Complete Streets as a core strategy for both safety and multimodal connectivity. In 2022, the Washington State Legislature passed <a href="#">Senate Bill 5974</a>, the Move Ahead Washington package. The bill directs WSDOT to incorporate the principles of Complete Streets in most state transportation projects. More information, including staff contacts, can be found on WSDOT’s <a href="#">Complete Streets</a> webpage. As WSDOT projects on state routes in Snohomish advance into the design phase, we look forward to working with the city on our shared goal of a complete active transportation network across city and state facilities.</p>   | <p><b>RESPONSE 4-2</b></p> <p>Thank you for this feedback and for providing the additional resources. These comments are noted and will be provided to both Public Works staff and City decision makers for consideration.</p>   |

| Letter | Comment   | Response  |
|--------|---|---|
| 4      | <p><b>COMMENT 4-3</b></p> <p>WSDOT’s comprehensive planning resources for local agencies can be found on our <a href="#">Land Use and Transportation Guidance</a> page. This includes a wealth of information on how WSDOT reviews local agency plans, our land use and transportation goals, best practices in building transportation efficient communities, and pertinent concurrency and SEPA guidance. WSDOT’s <a href="#">Community Planning Portal</a> may be particularly helpful for local jurisdictions. The portal includes data on the state transportation system often needed to complete the transportation element inventory required by the Growth Management Act. In addition to the data included in the portal, local planners can add their own data to ArcGIS Online and create custom reports.</p> | <p><b>RESPONSE 4-3</b></p> <p>Thank you for providing these additional resources. These comments are noted and will be provided to both Public Works staff and City decision makers for consideration.</p>  |
| 4      | <p><b>COMMENT 4-4</b></p> <p>WSDOT appreciates being included in Marysville’s planning process. Please reach out if you would like to discuss opportunities for ongoing engagement and coordination, as well as technical assistance available during your work updating your plans. Thank you again for the opportunity to review the Marysville Comprehensive Plan EIS. We look forward to our continuing productive partnership.</p>   | <p><b>RESPONSE 4-4</b></p> <p>Thank you for providing comments and the offer of further technical assistance. These comments are noted and will be provided to both Public Works staff and City decision makers for consideration. The City also looks forward to our continued productive partnership.</p> |

## Letter 1

[External!] Public comment: Comp Plan, SEIS, CIP, budget



Kristin Kinnamon <bikenbus@gmail.com>  
To Marysville2044

Retention Policy: Marysville 7 Year Delete (7 years)  
Follow up. Completed on Tuesday, November 12, 2024.  
You forwarded this message on 11/12/2024 11:57 AM.

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Tue 11/12/2024 10:08 AM

Some people who received this message don't often get email from [bikenbus@gmail.com](mailto:bikenbus@gmail.com). [Learn why this is important](#)

**[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.

Dear Planning Commissioners,

Comprehensive Plans are mandated by the state, as are the elements and priorities addressed in each plan. In its draft SEIS Marysville describes one purpose of the 2024-44 Comprehensive Plan as “Addressing the various statutes and plans pertaining to transportation and streets, which pertain to Complete Streets, Multi-modal Level of Service standards, and reducing greenhouse gas emissions (GHG) and vehicle miles traveled (VMT).” (Oct. 18 SEIS notice)

Unfortunately, this plan fails to address these issues in any substantive way. While the City has made some visible progress in pedestrian and bicycle infrastructure in recent years, these have tended to be disconnected spot treatments. The Comprehensive Plan fails to live up to its name when it comes to pedestrian and bike safety or infrastructure planning.

**A Master Plan for pedestrians and bicyclists is needed to supplement this Comp Plan** - and should be included in the upcoming **City Budget**. Without that, we will never reach this stated goal “The City will have a safe, cleaner, integrated, sustainable, and highly efficient multimodal transportation system that supports the City land use plan and regional growth strategy and promotes economic and environmental vitality and improves public health.” (p. 259)

I am passionate about the need for a healthy, safe community where people are active and comfortable walking, biking and rolling. While I am one of the “confident and fearless” bicyclists who will ride wherever needed to get to my destination, I am also speaking for my neighbors:

- The family with 4 kids who like to be active outside
- The 20-something young man who uses an electric wheelchair - and sidewalks, shoulders or bike lanes to get around
- The 70+ year old who jogs (slowly!) around the block
- The new people in the apartments off 100th who want to walk to Fred Meyer
- The woman with cerebral palsy who takes the bus to work

Pedestrian safety is called out as an issue in the draft plan, but no solutions are offered. “Between 2018 and 2022, there were 79 collisions involving pedestrians and 49 collisions involving bicyclists in Marysville. The largest concentration (34) of these types of collisions occurred along the State Avenue corridor.” (p. 241)

New **level of service standards for pedestrians** simply describe primary and secondary corridors and map the presence or absence of sidewalks. State Avenue has sidewalks and is designated as “complete.” But it lacks:

- Intersections with safe crossing opportunities - such as leading pedestrian intervals and protected left turn movements (so the light does not permit left turns when a pedestrian is present)
- Access control - consolidated driveways so there are fewer interactions (chances for crashing) between drivers and walkers
- Bus shelters for transit users
- Speed limits set with safety in mind

The **2024 Capital Improvement Program** proposes converting 3 intersections on State / Smokey Point Blvd to allow left turns on flashing yellow arrows. If any of these now have a protected left turn movement - where pedestrians can cross without competing with left turners - this “improvement” will actually reduce safety and increase vulnerability. (see NCHRP 926: Improving Safety at Intersections)

Marysville will never solve its problem of lacking and disconnected sidewalks throughout the City without LOS standards and concurrency requirements that incentivize either new development or the City itself to make sidewalk connections beyond the frontage of new housing. As new people and new cars are added to our City, intermittent sidewalks and safety treatments are not enough to keep pedestrian LOS and safety from being reduced.

The City needs a comprehensive approach to identifying and funding priority pedestrian improvements that connect schools, commercial areas and existing sidewalks.

The City has also demonstrated the need for an updated Bicycle Master Plan. The 2024 Comp Plan is both inaccurate and inadequate in its description and plan for bike infrastructure. Worst, is the proposed Level of Service standard that both secondary and primary bikeways be adequate only for a “higher level of stress.” That means people like me will bike, but not grandmas to the grocery store, kids to school, or middle-aged moms going to yoga.

The City will not reduce Vehicle Miles Traveled, Greenhouse Gas Emissions or achieve Complete Streets goals with this plan.

Research has confirmed that only low stress - often separated - bike facilities will encourage more people of all ages to bike. The proposed LOS basically allows the City to continue on its current path of vastly short-changing bike improvements for citizens overall.

The map of the Bicycle System Plan (p. 253) shows the bike route on 88th Street ending at 51st Avenue - with no connection to the transit service and commercial destinations on State Avenue.

On page 237, 51st Avenue is shown as being a bike facility with shoulders. However, the shoulder width can be as narrow as 1 foot (a very high stress, substandard width) - despite a recent road project

in the section south of Shoultes School and despite decades of the road being designated as a future bike corridor.

Without more clear goals and expectations for improved biking and walking, Marysville has failed to deliver on its past multimodal transportation plans.

For example, the **2015 Transportation Plan** called for 64th Avenue NE and 70th Street between the YMCA and Grove Elementary School to be a future “bikeway.” That road was resurfaced in 2024, and did receive full-width speed humps for traffic calming (not ideal for bicyclists). It did not have any bike infrastructure added. The travel lanes remain wider than 14 feet and the parking lanes are also extra wide - encouraging rather than discouraging speed in this residential neighborhood.

The **2015 Transportation Plan** designates 60th Avenue NE connecting Grove to 88th Street as a priority pedestrian corridor. The street did receive valuable traffic calming and re-striping that added a wide, walkable shoulder on the east side. However, that shoulder ends in the final block rather than continuing to Grove Street - ROW space is dedicated instead to vehicle parking on the west side of the road.

On 80th Street, new bike lanes were added. But two successive intersections have different treatments for the right turn lane. In one block, the bike lane is between the through lane and the right turn lane. In the next block, the bike lane is inside the turn lane. Such inconsistency makes one suspect there is no one paying attention to designing bike infrastructure that meets national standards (such as [Urban Bikeway Design from the National Assoc. Of City Transportation Officials](#))

The missteps make it clear to me that more defined and enforceable standards are needed for Marysville to make progress on multimodal mobility.

**The Transportation Element of the Comp Plan** makes no reference to the City’s current [Complete Streets Policy](#), adopted in 2016. Perhaps because no one follows it? The policy needs an update to meet national models for transparency and implementation elements (see [Smart Growth America](#), and [MSRC](#) resources). Clearly, many exceptions to Complete Street designs have been made as Marysville grows. Those are supposed to be approved by the Public Works Director. A model policy would add that those exceptions should be posted for public comment before approval.

As it is, both the Complete Streets policy and the adopted 2015 Transportation Plan have failed to have sufficient influence on street plans and projects since they were adopted. I fear the same will happen with this Comp Plan as written. To address these concerns, **a Master Plan for Biking and Walking should address both policy and implementation based on current national standards.**

**A few housekeeping items** in the **Comp Plan** should also be addressed before adoption.

Transit: the plan was written before a planned, major redesign of Community Transit’s service. It should be updated to accurately describe the current service - for instance, new bus routes that serve Lynnwood instead of Seattle, and the existing local bus service on State Avenue that operates at 15 minute frequencies to Everett and Lynnwood throughout the day.

**A more comprehensive look at transit service and needs** would also call out the lack of bus shelters or other stop amenities such as lighting, sidewalk access and safe crosswalks.

**Public input** was sought and is summarized in “Voices from the Community” sidebars throughout the plan. These quotes are interesting - and anecdotal? Some footnotes and an appendix should outline the source of the “voices” - how many people responded to surveys or participated in outreach? The results of the City’s public participation process should be outlined in the plan.

Sincerely,

Kristin Kinnamon  
Marysville, WA

Kristin Kinnamon  
Sharing Wheels Community Bike Shop, board member  
McClinchy Camano Classic Century, coordinator 2024  
B.I.K.E.S. Club of Snohomish County, member  
425-923-7868 (personal cell)

## Letter 2

927 Quinn Avenue NE  
Marysville, WA 98270  
360-659-7252 home  
425-244-3281 cell  
[kathyjohnsondvm@gmail.com](mailto:kathyjohnsondvm@gmail.com)

18 November 2024

Angela Gemmer, Principal Planner  
City of Marysville  
Community Development Department  
501 Delta Avenue  
Marysville, WA 98270

Submitted electronically to [agemmer@marysvillewa.gov](mailto:agemmer@marysvillewa.gov)

Dear Ms. Gemmer:

Re: Draft Supplemental Environmental Impact Statement for the 2024 Marysville Comprehensive Plan Update

I've read a lot of Environmental Impact Statements but never saw one like this! Where is the discussion of the plan's effects on ESA-listed species, wildlife, water quality, soils, etc.?

Beyond that, I am very concerned about the proposal to build housing and businesses on the waterfront. This is a liquefaction zone and subject to sea level rise and flooding. Building here—especially building homes—would endanger human lives and result in enormous costs to the municipal and federal governments (and hence taxpayers) and property owners. Adding structures here would also increase runoff and adversely affect water quality and wildlife. On the other hand, restoring natural vegetation and wetlands in this area would ameliorate these effects while simultaneously providing wildlife habitat and beautiful amenities to foster public health, including mental health.

Waterfront development would be counter to the following goals and policies from the Comprehensive Plan.

**Goal EN 3** Design and build developments in a manner that respects and retains ecosystem services, natural elements, vegetation and critical areas, with emphasis on streams, creeks and other bodies of water; and on wetlands, and steep slopes.

**Policy EN 0.13** Protect, restore and/or enhance natural systems, critical areas, hydrological functions and water quality, including restoring shorelines and estuaries, removing fish-blocking culverts, reducing use of toxic products, and retrofitting basins to manage stormwater.

**Goal EN 18** Account for climate change impacts when planning, siting, designing, and operating capital facility, utility, and infrastructure projects.

**Policy EN 0.56** Discourage construction in designated flood hazard areas, and prohibit it in floodway areas. Developments in designated flood hazards areas shall be adequately flood-proofed.

Regarding the transportation element, the planning for bicycle routes is woefully inadequate. We need connections between the short, sporadic designated bike lanes that exist in the city. Nowhere in the city are bike lanes separated from traffic. And such lanes are particularly needed on State Avenue to Smokey Point; expecting bicyclists to travel out of their way to 51<sup>st</sup> Avenue for north-south travel is unreasonable. Many automobile trips could be eliminated if people felt safe bicycling on Marysville's streets. Planning that encourages bicycle use would reduce air pollution and improve the health of citizens.

Thank you for considering my comments.

Sincerely,

Kathy Johnson

## Letter 3



WEB MBAKS.COM | OFFICE 425.451.7920 | FAX 425.646.5985  
335 116<sup>TH</sup> AVENUE SE | BELLEVUE, WASHINGTON 98004



November 18, 2024

Angela Gemmer  
Principal Planner  
City of Marysville  
Community Development Department  
501 Delta Avenue  
Marysville, WA 98270

RE: 2024 Comprehensive Plan – MBAKS Comments

Dear Angela Gemmer,

Master Builders Association of King and Snohomish Counties (MBAKS) thanks you for the opportunity to engage with you as you evaluate the 2024 Comprehensive Plan Update. With nearly 2,600 members, MBAKS is the largest local homebuilders' association in the United States, providing a range of housing choice and affordability. We aspire to be the most trusted and respected housing experts in the region. We believe everyone deserves a place to call home.

#### Action Alternative

MBAKS applauds Marysville's recognition that additional residential capacity of over 13,000 new units may be necessary to align with the regional policies for concentrating growth over the next twenty years. MBAKS recognizes the thoughtful planning that was devoted to the analysis of all the growth scenarios in Draft SEIS. MBAKS supports the work that Marysville has done to reach its preferred choice.

MBAKS supports the city of Marysville recommended action alternative which largely retains the City's existing Comprehensive Plan land use and zoning designation. However, as noted the alternative does reassess land use assumptions and growth capacity by evaluating changes within the city since 2015 and updates to state law. This option best fulfills Strategy 1 from the Marysville Housing Action Plan to **Increase Housing Diversity to Expand Rental and Homeownership Opportunities for a Wider Range of Households** (also see Middle Housing section below).

Moreover, the city has shown flexibility in its planning by keeping the option open of additional infill and density along the SWIFT route as Community Transit finalizes its plans. The flexibility and forethought for this scenario will pay dividends as new growth along this major corridor may become a reality. Finally, this flexibility in the plan will enable the city of Marysville to fulfill Housing Action Plan 1.1, to **Increase Residential Density Along Future Transit Lines**.

#### Permitting and Regulation

MBAKS recognizes the Plan is important for protecting the incredible Puget Sound environment, while planning for and updating options and opportunities residents



have regarding where they live, work, and play. We want to ensure policymakers remember that new and revised elements within a comprehensive plan often come along with unintended direct, or indirect, added costs to provide housing.

For example, MBAKS appreciates the recent work the Planning Commission and staff completed on November 12<sup>th</sup> to analyze the proposed implementation of SB 5290's new requirements (MMC Chapter 22G.010 and .020 under review). MBAKS stands ready to work with the city of Marysville and other stakeholders to further the goal of reducing permit timelines, lowering permit fees, and increasing efficiency.

However, MBAKS would like to see in the Plan more provisions that recognize Marysville's role in providing attainable housing and a variety of housing types for all economic segments of the community; that encourage the city to work actively with the building industry to meet our housing needs; and that encourage permit reform consistent with new and existing state law. We support adding language to any provision that clarifies the goal expressed should not result in increased permit fees and permit timelines. Adhering to the provisions of this new law would help address a key barrier to facilitating more housing choices.

❖ Accessory Dwelling Units:

MBAKS supports policies to promote and enable the development of accessory dwelling units (ADUs). MBAKS supports consideration of additional policy support for ADUs consistent with new state legislation HB 1337. In 2022 the city of Marysville last examined its ADU provisions. MBAKS would urge a re-examination in 2025 to evaluate whether additional policy support would be advantageous for residents and the city, as it works to provide greater flexibility for ADUs.

MBAKS supports the additional adoption of provisions, including:

- Allow Detached ADUs of at least one thousand square feet.
- Set impact fees below 50% for ADUs.
- Priority permitting for ADUs.
- Developing pre-approve form plans.
- Removing off-street parking requirements.

❖ Middle Housing:

It is our understanding Marysville will wait to address the new Middle Housing requirements until 2025. However, including a reference to the "Middle Housing Overlay" provisions in the Plan is an encouraging step. By the inclusion of the overlay in the Comprehensive Plan Update the city is providing continuity in administering future zoning regulations. Housing production to maximize options and incentivize development and supply of middle housing is essential to accommodate the additional anticipated housing units adopted under the Plan. In addition, this will



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335 116<sup>TH</sup> AVENUE SE | BELLEVUE, WASHINGTON 98004



create diverse housing options for community members, access to services and transit, and encourage a better job-housing balance.

MBAKS encourages the City's inclusion of future Middle Housing proposals that would:

- Allow outright duplex, triplex, and fourplex multifamily developments in all residential zones.
- Allow building heights to thirty-five feet in lower-density zones, to support compatible development with existing neighborhoods.
- Reduce landscaping and on-site recreation requirements, and reduce parking requirements, to incentivize development of the middle housing types and improve affordability.

Thank you for the opportunity to comment on the 2024 Comprehensive Plan Update. MBAKS looks forward to engaging with the city of Marysville as these policies are further developed and implemented to support the goal of creating a sustainable future. We appreciate your hard work and want to serve as a trusted resource for the city of Marysville.

Please let us know if you have any questions or would like to discuss this further.

Sincerely,

*Russell Joe*

Russell Joe  
Snohomish County Government Affairs Manager

Everyone deserves a place to call home.  
cc: Haylie Miller, Community Development Director

## Letter 4



Management of Mobility Division  
 2901 3rd Avenue, Suite 500  
 Seattle, WA 98121-3014  
 206-464-1211 / FAX: 206-464-1189  
 TTY: 1-800-833-6388  
[www.wsdot.wa.gov](http://www.wsdot.wa.gov)

November 18, 2024

City of Marysville, Community Development Department  
 501 Delta Avenue  
 Marysville, WA 98270

Dear Ms. Gemmer,

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to review and comment on the Marysville draft Comprehensive Plan Environmental Impact Statement (EIS). Please find our comments on these planning efforts below.

WSDOT appreciates the challenges local jurisdictions face with accommodating housing and job growth. We understand that intensifying development can place stress on existing transportation facilities, including impacts on I-5 and its interchanges. We were unable to find any analysis or discussion of the impacts to I-5 in the draft EIS. Therefore, WSDOT recommends that, per the requirements of RCW 36.70A.070(6), the EIS include additional information on this topic. In addition, if the city is planning to utilize SB 5412 in the future to streamline housing development, consultation with WSDOT is required. As outlined in SB 5412 the city "must document its consultation with the department of transportation on impacts to state-owned transportation facilities including consideration of whether mitigation is necessary for impacts to transportation facilities."

WSDOT is pleased with the city's focus on Complete Streets as a core strategy for both safety and multimodal connectivity. In 2022, the Washington State Legislature passed [Senate Bill 5974](#), the Move Ahead Washington package. The bill directs WSDOT to incorporate the principles of Complete Streets in most state transportation projects. More information, including staff contacts, can be found on WSDOT's [Complete Streets](#) webpage. As WSDOT projects on state routes in Snohomish advance into the design phase, we look forward to working with the city on our shared goal of a complete active transportation network across city and state facilities.

WSDOT's comprehensive planning resources for local agencies can be found on our [Land Use and Transportation Guidance](#) page. This includes a wealth of information on how WSDOT reviews local agency plans, our land use and transportation goals, best practices in building transportation efficient communities, and pertinent concurrency and SEPA guidance. WSDOT's [Community Planning Portal](#) may be particularly helpful for local jurisdictions. The portal includes data on the state transportation system often needed to complete the transportation element inventory required by the Growth Management Act. In addition to the data included in the portal, local planners can add their own data to ArcGIS Online and create custom reports.

#### **Further Engagement & Coordination**

WSDOT appreciates being included in Marysville's planning process. Please reach out if you would like to discuss opportunities for ongoing engagement and coordination, as well as technical assistance available during your work updating your plans.

Thank you again for the opportunity to review the Marysville Comprehensive Plan EIS. We look forward to our continuing productive partnership.

Sincerely,

Jeff Storrar, WSDOT Management of Mobility Policy Manager

CC: Matthew Kenna, WSDOT Management of Mobility

## 3.0. Acronyms and References

### 3.1. Acronyms

|      |   |
|------|---|
| BRT  | Bus Rapid Transit                           |
| DMP  | Downtown Master Plan                        |
| EIS  | Environmental Impact Statement              |
| GMA  | Growth Management Act                       |
| LID  | Low Impact Development                      |
| OFM  | Office of Financial Management              |
| PSRC | Puget Sound Regional Council                |
| SEIS | Supplemental Environmental Impact Statement |
| SEPA | State Environmental Policy Act              |
| SMP  | Shoreline Master Program                    |

### 3.2. References

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