

**Appendix D: Arlington Responses to
Expanded Checklist for
Comprehensive Plan
Update
(2015)**

The Washington Department of Commerce provided a checklist to communities to guide their 2015 Plan update. These are guidelines, not rules, but provide information on updates to State law, regional policies, etc. so that communities can adopt the update with confidence that their plans meet the requirements. The following summary informs Arlington citizens of how the 2015 Plan was developed and provides a history to those who will update the Plan in 2023.

In this 2017 update, responses differ only slightly from the 2015 document.

The Checklist and responses follow:

1. The **Land Use Element** should be consistent with countywide planning policies (CWPPs) and RCW 36.70A.070(1), and should consider, WAC 365-196-400, WAC 365-196-405, WAC 365-196-300 through 345

a. The element integrates relevant county-wide planning policies into the local planning process, and ensures local goals and policies are consistent. For jurisdictions in the Central Puget Sound region, the plan is consistent with applicable multicounty planning policies. WAC 365-196-305

- Consistency with countywide planning policies
- Consistency with multicounty planning policies, where applicable

1. **The Arlington Plan is consistent with the Countywide Planning Policies for Snohomish County, as amended in 2014. A consistency analysis is contained in Appendix C of the Plan. It includes a list of policies that are compatible with the updated City Plan and those that, although not directly relevant to Arlington, are adopted in principle.**

2. **Countywide Planning Policies and Multi-County Planning Policies are adopted by Reference as Appendix C.**

3. **Implementation strategy includes requirement that land use decisions and other relevant City decisions be reviewed against planning policies, including Countywide Planning Policies and MultiCounty Planning Policies. See proposed policies PO 6.7, PL 12.5 and PS 2.1.**

b. The element includes a future land use map (or maps). Maps fulfill the requirement to show the general distribution of land, where appropriate, for agriculture, timber production, housing, commerce, industry, recreation, open spaces, general aviation airports, public utilities, public facilities, and other land uses. RCW 36.70A.070(1) and WAC 365-196-400(2)(d). The future land use map shows city limits and urban growth area (UGA) boundaries. RCW 36.70A.110(6), RCW 36.70A.130, WAC 365-196-310 and WAC 365-196-405(2)(i)(ii).

- Land use map

1. **The 2015 Land Use Map is included in Chapter 2; and is discussed in Chapters 4 (Planning Area Descriptions) and Chapter 5 (Land Use).**
 2. **The Land Use map is consistent with the population, employment and buildable lands analysis.**
- c. The Land Use Element (Chapter 5) includes population densities, building intensities, and estimates of future population growth. RCW 36.70A.070(1) WAC 365-196-405(2)(i) suggests including a table with the range of dwelling units per acre allowed in each land use designation and implementing zone as a projection of existing and projected development capacity.
1. **All required elements are in the Plan: Chapters 5.**
 2. **Future population, housing and job growth consistent with PSRC allocations as part of Vision 2040.**
 3. **Chapter 5 (Land Use) discusses land capacity and the effect of reducing density in the Brekhus/Beach subarea. The City accepts the Snohomish County Buildable Lands Report estimates. With the infill and redevelopment assumptions, the 2035 population estimate of 24,937 can be accommodated.**

The plan should also indicate the population for which it is planning, which should be consistent with the Washington Office of Financial Management's forecast for the county or the county's sub-county allocation of that forecast, and should be the same for all comprehensive plan elements, and is. If OFM population projection is not used, the plan includes the rationale for using another figure. RCW 43.62.035 and WAC 365-196-405(f)

1. **All population and employment figures are consistent with Vision 2040, Transportation 2040, State and County forecasts. They are also consistent with population and housing numbers in the County's 2013 Housing Characteristics and Needs Report, Snohomish County.**

Counties should indicate the percentage of county-wide population growth allocated for urban growth areas. This allocation should be consistent with GMA goals of encouraging urban growth in urban areas, reducing sprawl, and ensuring public facilities and services are efficiently provided. WAC 365-196-405 (f)

Population projection uses latest forecast

1. **County issue. The City Plan is consistent with adopted PSRC population projections.**

Urban densities and urban growth areas (UGAs) have been reviewed. RCW 36.70A.130(3)(a), (5), and (6) and WAC 365-196-310(2).

By definition, urban growth areas all incorporated lands in cities and town, and unincorporated urban growth areas designated by a county. A review should be completed as part of the 8-year update under RCW 36.70A.130. Review WAC 365-196-310(2) for suggestions on evaluating and designating UGAs. Supporting information should include: selected population growth forecast scenario RCW 43.62.035; population allocation and percentage of land devoted to urban, rural, and resource uses (counties) RCW 36.70A.070(1); land capacity analysis for UGAs, ability to provide urban services. RCW 36.70A.110, CWPPs and WAC 365-196-310.

There should be a coordinated approach to planning for development in urban growth areas, especially among adjacent jurisdictions. WAC 365-196-330 Urban growth areas (incorporated or not) must plan for urban densities and urban services. If a county designates a fully contained community (FCC), part of the county's population allocation should be reserved for the FCC. RCW 36.70A.350(2). If a potential UGA expansion area is within the 100-year flood plain of major western Washington rivers, consider RCW 36.70A.110(8).

UGA review (required every 8 years)

1. **The buildable lands analysis developed jointly by Arlington and Snohomish County, shows measures needed to ensure appropriate densities. Such measures are not needed immediately, but will be considered as the need arises. RCW 36.70A.215 and WAC 365-196-315 and the Buildable Lands Program Guidelines include a list of measures.**

Reasonable measures adopted if needed

Infill, rezones and other measures were considered and will meet population, housing and employment needs through 2015. Additional measures and mechanisms will be studied. The element considers planning approaches that increase physical activity, such as neighborhood commercial nodes to allow walking and cycling to local services, transit- or pedestrian-oriented development, linear parks and trail networks, and siting schools and other public facilities within neighborhoods to allow easy walking RCW 36.70A.070(1) and WAC 365-196-405 (2)(j).

The City recently completed design guidelines for a proposed "Mixed Use Overlay" district which will be used to guide in-fill, redevelopment and new development in line with the buildable lands analysis and the City's future vision.

Planning for physical activity

1. **Plan emphasizes and encourages physical activity.**

2. **There are numerous mentions in neighborhood subareas of the need for further bike and pedestrian trail connections between residences, parks, community centers and retail areas.**
 3. **The City's trail system is integrated with sidewalks, other pedestrian facilities, transit nodes to encourage physical activity**
 4. **Goals and Policies (e.g. encourage physical activity in park planning, street development, transportation improvements.**
- d. Lands useful for public purposes such as utility corridors, transportation corridors, landfills, sewage treatment facilities, stormwater management facilities, recreation, schools, and other public uses are identified. RCW 36.70A.150 requires that a prioritized list of acquisitions be developed. [The list need not be part of the comprehensive plan.] RCW 36.70A.150 and WAC 365-196-340
- Public use lands
 - List of acquisitions
 1. **The riverfront Haller Park is designed around the City's upgraded sewage treatment plant.**
 2. **The Plan emphasizes bike and pedestrian trail development. The City will seek opportunities to combine trails with the capital improvements outlined in Chapters 7, 8 and 9.**
- e. Open Space corridors within and between urban growth areas, including lands useful for public purposes such as utility corridors, transportation corridors, landfills, sewage treatment facilities, stormwater management facilities, recreation, schools, and other public uses are identified. RCW 36.70A.150 RCW 36.70A.150 requires that a prioritized list of acquisitions be developed. [The list need not be part of the comprehensive plan.] RCW 36.70A.150 and WAC 365-196-340
- Open Space corridors
 1. **The Arlington-Marysville Manufacturing Industrial Center (AAMIC) will be master planned to include an extensive pedestrian/bike trail system integrated with the new roads that will be built.**
- f. If an airport is within or adjacent to the jurisdiction, the plan includes policies, land use designations, and zoning to discourage the siting of incompatible uses adjacent to general aviation airports. RCW 36.70.547 and WAC 365-196-455 See www.wsdot.wa.gov/aviation/Planning/default for guidance. Any planning adjacent to or within the "imaginary surface" areas of general aviation airports must consult with the Aviation Division of WSDOT.
- No incompatible uses near airports
 - WSDOT notified

1. The Plan contains numerous citations regarding the Arlington Airport and how it is to be protected from incompatible uses. These conflicts were noted as a problem in the 2005 Plan; the 2015 Plan notes that these issues have all been addressed through institution of the Airport Safety Overlay and Airport Protection District, on the zoning and plan maps.

- g. If a U.S. Department of Defense (DOD) military base employing 100 or more personnel is within or adjacent to the jurisdiction, the plan must include policies, land use designations, and consistent zoning to discourage the siting of incompatible uses adjacent to military base. RCW 36.70A.530(3) and WAC 365-196-475 See Map of U.S. bases to help make determination of applicability. If applicable, inform the commander of the base regarding amendments to the comprehensive plan and development regulations on lands adjacent to the base.

No incompatible uses near US DOD bases

Base commander notified

1. Not applicable. The U.S. Navy Support Center is located approximately three miles south of the southerly UGA boundary.

- h. Where applicable, the Land Use Element includes a review of drainage, flooding, and stormwater run-off in the area and nearby jurisdictions and provides guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state. RCW 36.70A.70(1); WAC 365-196-405(2)(c) . RCW 90.56.010(26) defines waters of the state. Jurisdictions subject to U.S. Environmental Protection Agency (EPA) National Pollution Discharge Elimination System (NPDES) Phase 1 and Phase 2, should comply with all permit requirements.

All local governments are also encouraged to:

- Adopt the State Department of Ecology's Stormwater Manual for Eastern or Western Washington or the equivalent.
- Incorporate relevant land-use recommendations from adopted local watershed plans. www.ecy.wa.gov/watershed/index.html.
- Adopt a clearing and grading ordinance if not already existing (See Technical Guidance Document for Clearing and Grading in Western Washington).

1. The City uses the 2005 Western Washington Manual
2. The City has an adopted clearing and grading regulation related to Appendix 33 of the adopted UBC. Provisions are contained in the code to ensure protection of environmentally sensitive areas.

Stormwater planning

1. The City maintains a stormwater management program (SWMP) in compliance with its NPDES II Stormwater Discharge Permit. The program is established by code and affects all land use and development decisions as appropriate.

- i. Critical areas are designated RCW 36.70A.170 and WAC 365-190-080 Best available science (BAS) is used to protect the functions and values of critical areas, and give “special consideration” to conservation or protection measures necessary to preserve or enhance anadromous fisheries. RCW 36.70A.172 and WAC 365-195-900 through 925.

Plan policies should address the five critical areas listed in RCW 36.70A.030(5) (a) wetlands; (b) areas with a critical recharging effect on aquifers used for potable water; (c) fish and wildlife habitat conservation areas; (d) frequently flooded areas; and (e) geologically hazardous areas. See Critical Areas Assistance Handbook (2007) and Small Communities Critical Areas Ordinance Implementation Guidebook (2007). Follow the process in WAC 365-195-915 to document decisions.

Endangered Species: If there are anadromous fisheries, or if the jurisdiction affected by an Endangered Species Act (ESA) 4(d) rule, the comprehensive plan should contain policies guiding decisions which may impact listed species. Special consideration may include:

- Revisions to zoning to protect habitat
- Revisions to the location of planned capital facilities
- Revisions to stormwater regulations or clearing and grading ordinances

Establishment or maintenance of monitoring programs to ensure that habitat is being maintained, See WAC 365-195-920.

BAS used to designate and protect critical areas

1. An Environmentally Critical Areas Regulation (AMC 20.88) is in effect meeting the criteria outlined above.

- j. Critical Aquifer Recharge Areas:(Required if jurisdictions draw groundwater for potable water or need to manage threats to exempt wells.): WAC 365-190-100
- The plan protects the quality and quantity of ground water used for public water supplies. RCW 36.70A.070(1) See Ecology’s guidance on Critical Aquifer Recharge Areas (CARAs).
 - For water quality, policies and implementing regulations should regulate hazardous uses in critical aquifer recharge areas (CARAs) and protect wellhead areas. See Ecology’s Groundwater Quality Information.
 - For water quantity, policies and implementing regulations should limit impervious surfaces, encourage water conservation measures, and consider

Water Resource Inventory Assessment (WRIA) plans. See Ecology's Stormwater Programs for more information.

CARAs protect water quality and quantity

1. **The City's Critical Area Ordinance contains significant provision for aquifer protection.**
2. **The City has regulations for wellhead protection (AMC 13.04.260) meeting the requirements of WAC 246-290-135. The Wellhead and Watershed Protection Program are in the currently adopted in the city Of Arlington Comprehensive Water System Plan.**
3. **Critical areas were documented as part of the Buildable Lands calculations.**

k. Natural Resource Lands (NRLs) designated and conserved: RCW 36.70A.170 RCW 36.70A.060. NRLs include forest, agricultural, and mineral resource lands. See process to classify and designate at WAC 365-190-040.

If forest or agricultural lands of long-term commercial significance are designated inside UGAs, they must be subject to transfer and/or purchase of development rights (TDR, or PDR). RCW 36.70A.060(4)

TDR or PDR program for forest or agricultural lands inside UGAs

1. **The City has withdrawn from the TDR program (AMC 20.38) because of an unsuccessful attempt to implement a project at Brekhus/Beach. It is hoped that future market demand will allow a new proposal to be brought forward.**

l. Designate and Conserve Forest Resource Land: RCW 36.70A.170 RCW 36.70A.060 Forest land is defined at RCW 36.70A.030(8). Review WAC 365-190-060 for recommendations on forest lands.

Forest lands designated

1. **Not Applicable. No forestry or agricultural lands.**

m. Designate and conserve agricultural resource lands (ARLs): RCW 36.70A.170 and RCW 36.70A.060. ARLS are defined at RCW 36.70A.030(2). See WAC 365-190-050 for recommendations to designate, and WAC 365-196-815 to protect agricultural lands. Land use and policies should discourage incompatible uses around natural resource areas.

RCW 36.70A.177(3) includes innovative techniques to conserve agricultural land and permitted accessory uses.

- Agricultural lands designated
- Limit accessory uses on agricultural lands

1. Not Applicable. No forestry or agricultural lands.

n. Designate mineral resource lands:

RCW 36.70A.131 requires consideration of new information including data available from the Department of Natural Resources relating to mineral resource deposits when reviewing mineral resource land designations. Minerals defined in RCW 36.70A.030(11) to include sand, gravel and valuable metallic substances. See WAC 365-190-070 for guidance on designation.

- Review mineral resource lands

1. Not Applicable. No mineral lands.

o. Development outside UGAs: If applicable, development planned outside UGAs must be consistent with the following:

Major industrial development: RCW 36.70A.365 and WAC 365-196-435

Master planned development: RCW 36.70A.367 and WAC 365-196-470

Master planned resorts RCW 36.70A.360, RCW 36.70A.362, and WAC 365-196-460

- If applicable, development outside UGA consistent with RCW

1. Not applicable

2. The Housing Element

1. Refer to housing sub-elements contained in Housing Chapter 6 and Goals and Policy sections.

The Housing Element is intended to ensure the vitality and character of established residential neighborhoods, encourage the availability of affordable housing to all economic segments of the population, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock. It should be consistent with relevant CWPPs, (RCW 36.70A.070 (2)), and should consider WAC 365-196-410.

- a. Include an inventory of existing housing units and an analysis the number (and type) of housing units necessary to provide for projected growth over the planning period. RCW 36.70A.070(2)(a) and WAC 365-196-410(2)(b) and (c) and Commerce's Assessing Your Housing Needs (1993, Updated by March 2013)
- Inventory of existing housing and projected housing needs using latest population projection.
- 1. Chapter 6 includes inventory information, past trends, future projections and reconciles the numbers with the population forecasts for 2035. All projections are consistent with those presented in the County's 2013 Housing Report, which implements Countywide Planning Policy HO-5. The projections divide future housing needs among the three levels of affordability (50%, 80% and 80+% MI).**
- b. Include goals, policies, and objectives for the preservation, improvement, and development of housing. RCW 36.70A.070(2)(b) and WAC 365-196-410(2)(a).
- Goals, policies for housing
- 1. Chapter 3 contains Goal GH-8 and policies dealing with provision of adequate and affordable housing.**
- 2. Chapter 6 provides analysis in support of these policies.**
- c. Identify sufficient land for housing, including but not limited to, government-assisted housing, housing for low-income families, manufactured housing, multifamily housing, group homes, and foster care facilities. RCW 36.70A.070(2)(c)
- Identify sufficient land for housing
- 1. As shown on Table 5.4, the City will maintain a goal of providing a housing mix of 82% (1,985) single-family and 18% (436) multi-family dwellings to meet the overall objective of 2,421 new added housing units by 2035. It will work to attract affordable housing as the market seems to be demanding (See Chapter 6) including as a requirement for bonus density in the HMU or other residential zones. Infill mechanisms will also be explored and used to achieve the 762 additional units called out in Table 5.5.**
- 2. The City allows for manufactured homes on an equal footing with other types of construction (AMC Table 20.40-1)**

- d. Provisions for existing and projected housing needs of all economic segments of the community. RCW 36.70A.070(2)(d)

Affordable housing is defined as when the total housing costs, including basic utilities, does not exceed 30 percent of the income limit (for renters, 50 percent or less of the county median family income, adjusted for family-size, and for owners, 80 percent or less of the county median family income, adjusted for family size for owners). WAC 365-196-410(e)(i)(C) (I-V).

WAC 365-196-410(2)(e)(iii) recommends an evaluation of the extent to which the existing and projected market can provide housing at various costs and for various income levels, and an estimation of the present and future populations that would require assistance to obtain housing they can afford. This section should also identify existing programs and policies to promote adequate affordable housing and evaluate their effectiveness.

If enacting or expanding affordable housing programs under RCW 36.70A.540, the plan should identify certain land use designations where increased residential development will assist in achieving local growth management and housing policies. Examples include: density bonuses within urban growth areas, height and bulk bonuses, fee waivers or exemptions, parking reductions, expedited permitting conditioned on provision of low-income housing units, or mixed use projects.

Affordable housing planned

1. See Chapter 6 – Housing
2. The City will explore additional incentives to promote form-based and mixed use developments in the West Arlington Subarea

3. The Capital Facilities Plan

The **Capital Facilities Plan (CFP) Element** must be consistent with county-wide planning policies and RCW 36.70A.070(3), should consider WAC 365-196-415, and should serve as a check on the practicality of achieving other elements of the plan. This element should cover all the capital facilities planned, provided, and paid for by public entities including to local government and special districts, etc. This should include water systems, sanitary sewer systems, storm water facilities, schools, parks and recreational facilities, police and fire protection facilities. Capital expenditures from park and recreation elements, if separate, should be included in the capital facilities plan element. For additional information see Making Your Comprehensive Plan a Reality: A Capital Facilities Preparation Guide Washington Department of Community Trade and Economic Development (CTED), 1993.

- a. Goals and policies relating to investment in capital facilities, levels of service and regulatory strategies for concurrency to guide decisions. RCW 36.70A.120 and WAC 365-196-415

1. **Chapter 9 contains the capital facilities plan for Arlington based on the projections and policies contained in Chapters 3-8. Chapter 8 includes the CIP for Transportation. Implementation of these CIPs will meet the concurrency requirements of GMA.**
2. **Future projects will be required – through SEPA review and the City’s Development Code – to show concurrency with the facilities in place at the time of development.**

- b. Inventory showing the locations and capacities of existing capital facilities owned by public entities RCW 36.70A.070(3)(a) and WAC 365-196-415(2)(a) recommends the inventory include water, sanitary sewer, stormwater, solid waste management, school, park, and recreation facilities, police and fire protection facilities. The element should reference water or other system plans, indicate locations of facilities, and show where systems currently have unused capacity. Public services and facilities are defined in RCW 36.70A.030(12) and (13).

Inventory of existing facilities

1. **Chapters 7-9 contain up-to-date inventories of all City facilities and an analysis of future needs.**
2. **The Arlington and Lakewood School Districts have verified the Plan narrative.**
3. **Other providers (Community Transit, energy providers, solid water collection services, etc.) have adequate capacity to serve the City.**

- c. **Adopted levels of service (LOS) for public services.**

Adopted LOS.

1. **Level of Service is discussed under each section of Chapters 7-8.**

- d. Forecast of future needs to maintain adopted levels of service over the planning period. RCW 36.70A.070(3)(b) requires a forecast of future needs, and WAC 365-196-415 (b) recommends the forecast be based on projected population densities, and distribution of growth over the planning period. This section should consider whether the jurisdiction has sufficient water rights, sewage treatment, or other needed public facilities to support the plan’s projected 20-year growth. This may also consider system management or demand management strategies to meet forecast need.

Forecast of future needs

1. **The City has updated its Water, Sewer, Transportation and Stormwater plans concurrent with the GMA Comprehensive Plan update.**
 2. **No concurrency issues were detected during Plan development. Utilities will serve growth targets.**
- e. Proposed locations and capacities of expanded or new capital facilities. RCW 36.70A.070(3)(c) requires proposed locations and capacities, and WAC 365-196-415 (3)(C) suggests that the phasing schedule in the Land Use Element should dictate when and where capital facilities will be needed over the 20-year life of the plan. Consider if the concurrency ordinance or other mechanisms have been effective in providing public facilities and services concurrent with development
- Proposed locations and capacities of expanded or new facilities.
1. **Capital facilities are concurrent with present demand.**
 2. **The City has updated its Water, Sewer, Transportation and Stormwater plans concurrent with the GMA Comprehensive Plan update.**
 3. **Other future improvements are targeted toward maintaining quality and meeting level of service standards.**
- f. Six-year plan (at least) to finance planned capital facilities within projected funding capacities, and identifies sources of public money for such purposes. RCW 36.70A.070(3)(d), RCW 36.70A.120 and WAC 365-196-415(c)(i)

This CFP should include all public expenditures for capital expenses including water, sewer, transportation, etc. WAC 365-196-415(2)(c)(ii) suggests that the plan be updated at least biennially so that financial planning remains sufficiently ahead of the present for concurrency to be evaluated.

If impact fees are collected, the public facilities for which money is to be spent on must be included in this element. RCW 82.02.050(4) and WAC 365-196-850

- Six-year funding plan consistent with comp plan
- Impact fees used only for projects included in the CFP
1. **The City has updated its Water, Sewer, Transportation and Stormwater plans concurrent with the GMA Comprehensive Plan update.**
 2. **Six Year Plans will be finalized after Planning Commission and Council Review.**
 3. **Impact fees are collected under existing City code (AMC 20.90) for parks and transportation. The City collects school impact fees, when assessed, on behalf of the Arlington and Lakewood Districts, when requested.**

Policy to reassess the Land Use Element if probable funding falls short of meeting existing needs and to ensure that the Land Use Element, Capital Facilities Element, and financing plan within the Capital Facilities Element are coordinated and consistent. [RCW 36.70A.070(3)(e) and WAC 365-196-415(2)(d)(iii)(F) recommends that the plan set forth how pending applications for development will be affected while such a reassessment is being undertaken.

Land Use reassessment policy included

1. **See Page 1-5.**
2. **The Plan as prepared is “concurrent”. No reassessment is necessary.**
3. **The Implementation section (Chapter 1) and Appendix “I” discusses the City’s reassessment approach, if and when an element is found to be non-concurrent.**

4. Utilities Element

The Utilities Element should relate to all services provided, planned for, paid for, and delivered by providers other than the jurisdiction. This should be consistent with relevant CWPPs and RCW 36.70A.070(4), and should consider WAC 365-195-420.

- a. The general location, proposed location, and capacity of all existing and proposed utilities, including, but not limited to, electrical lines, telecommunication lines, and natural gas lines. RCW 36.70A.070(4). WAC 365-195-420 recommends goals and policies relating coordination in construction, permits, utility corridor use and management. Counties and cities should evaluate whether any utilities should be identified as essential public facilities in case of siting difficulties.

General location and capacity of existing and proposed facilities

1. **Chapter 2 contains maps and descriptions of current utilities.**
2. **Non-City utility providers are being consulted; those responding thus far confirm that they can serve the projected growth in housing, population and employment.**

5. Rural Element

1. **Not applicable.**

The Rural Element (counties only) should be consistent with RCW 36.70A.070(5), RCW 36.70A.030(15) through (17), and consider RCW 36.70A.011 and WAC 365-196-425. Rural lands are lands not designated for urban growth, or designated as agricultural, forest, or mineral resource lands. For additional information, see Keeping the Rural Vision: Protecting Rural Character & Planning for Rural Development, 1999.

- a. A definition of rural character and rural development consistent with RCW 36.70A.030, (15), (16), and (17). WAC 365-196-425(2) provides suggestions.

Definition of rural character

- b. Allows forestry, agriculture, and a variety of rural densities and uses. RCW 36.70A.070(5). See WAC 365-196-425(3) for examples of rural densities. The plan may include optional techniques such as limited areas of more intensive rural development (LAMIRDs), clustering, density transfer, design guidelines, and conservation easements to accommodate rural uses not characterized by urban growth as specified in RCW 36.70A.070(5)(d). See WAC 365-196-425(5) for innovative zoning techniques.

Variety of densities

- c. A written record explaining how the rural element harmonizes the planning goals and meets the requirements of the Growth Management Act. RCW 36.70A.070(5)(a). WAC 365-196-425(1) A county may consider local circumstances in establishing patterns of rural densities and uses, but must develop a written record of the rural element harmonizes the planning goals and meets the requirements of the act.

A written record relating to rural character

- d. A definition of rural governmental services needed to serve the permitted densities and uses, and a policy that limits urban services in rural areas RCW 36.70A.110(4). RCW 36.70A.030((17) <http://apps.leg.wa.gov/RCW/default.aspx?cite=36.70A.070> and WAC 365-196-425(4) recommends some definitions of rural services and provides suggestions for appropriate level of service standards.

Definition of rural services

- e. Measures protecting rural character. RCW 36.70A.070(5)(c) Measures include containing/controlling development, assuring visual compatibility, reducing inappropriate conversion to low-density sprawl, protecting critical areas, and protecting against conflicts with natural resource lands.

Measures to protect rural character

- f. If designated, limited areas of more intense rural development (LAMIRDs) are consistent with RCW 36.70A.070(5)(d). See WAC 365-196-425(6) for guidance relating to LAMIRDs.

Commerce suggests that jurisdictions consider Growth Management Hearings Board cases and Commerce's Keeping the Rural Vision: Protecting Rural Character & Planning for Rural Development, 1999 for guidance on appropriate rural densities and levels of governmental services in LAMIRDs.

- ❑ LAMIRDs designated and regulated consistent with GMA

6. Transportation Element

1. **Transportation section (Chapter 8) is updated consistent with an update of the City's Transportation Plan (2015). It has been adopted by reference in the Comprehensive Plan and its findings incorporated into the Plan.**
2. **The City has advised Snohomish County that its Draft EIS for the County's Plan update provides a consistent analysis of the City's transportation needs.**

The **Transportation Element** should be consistent with relevant CWPPs and RCW 36.70A.070(6), RCW 36.70A.108, and should consider WAC 365-196-430 and *Your Community's Transportation System: A Guide to Updating and Implementing your Transportation Element (2012)*

1. **Snohomish County and Multi-County Planning Policies are adopted as part of the updated Plan (Appendix C).**
 2. **WAC 365-196-430**
 - a. **Land use, population and employment forecasts for 2035 were used as inputs to the updated Transportation Plan.**
 - b. **Arlington is an active participant in countywide transportation planning efforts, including membership on the Snohomish County Committee for Improved Transportation (SCCIT), the Economic Alliance of Snohomish County and the Growth Management Steering Committee (SCT). Through collaboration among these groups, the major multi-modal transportation priorities have been identified, including those serving Arlington.**
 - c. **Projected growth will cause no direct change in impacts to State owned facilities, although the longer term goal is to extend SR-531 to SR-9. This improvement is not concurrency related.**
 - d. **The City's transportation policies and most of its subarea (neighborhood) plans emphasize multi-modal approaches including pedestrian paths, bicycle lanes.**
- a. The element includes goals and policies for roadways; fixed route and demand response public transit; bicycle and pedestrian travel; water, rail, air, and industrial port and intermodal facilities; passenger and freight rail; and truck, rail, and barge freight mobility. WAC 365-196-430(2)(b)].

The element should include policies and provisions consistent with regional efforts to reduce criteria pollutants from mobile sources. WAC 173-420-080 If the planning area is within a National Ambient Air Quality Standards nonattainment area, WAC 365-196-430(2)(d) recommends including a map of the nonattainment area, severity of the violation, and measures to be implemented consistent with the state implementation plan for air quality.

1. **Arlington lies outside the nonattainment areas for CO and particulates. Along with most other cities in Snohomish County, Arlington falls within the maintenance area for Ozone.**
 2. **The City has adopted a transportation demand management and CRT program (AMC Chapter 10.80)**
 3. **Policies will be added in support of regional efforts to reduce the effects of all three categories.**
- b. An inventory of air, water, and ground transportation facilities and services, including transit alignments, state-owned transportation facilities, and general aviation airports to define existing capital facilities and travel levels as a basis for future planning. RCW 36.70A.070(6)(a)(iii)(A). WAC 365-196-430(2)(c) provides recommendations for meeting inventory requirements.

Transportation inventory

1. See Chapter 8.

- c. The element includes regionally coordinated level of service (LOS) standards for all arterials and transit routes, LOS for highways of statewide significance, and LOS for other state highways consistent with the regional transportation plan. RCW 36.70A.070(6)(a)(iii)(B)

1. See Chapter 8.

WAC 365-196-430(2)(e)(v) recommends LOS be set to reflect access, mobility, mode-split and capacity goals. WAC 365-196-430(2)(e)(vi) recommends that measurement methodology and standards vary based on the urban or rural character of the surrounding area. Also, balance community character, funding capacity, and traveler expectations. In urban areas, WAC 365-196-430(2)(e)(vii) recommends methodologies for analyzing the transportation system from a comprehensive, multimodal perspective.

Levels of service for all facilities; local, regional, and state

1. **See Chapter 8.**
2. **The “2035 Transportation Plan” will be adopted by reference and has been integrated into the GMA Comprehensive Plan.**
3. **The City of Arlington has adopted the following levels of service:**
 - City arterials = LOS D**
 - All other City streets = LOS C**
 - Highways of Statewide Significance = LOS D**
 - Regionally Significant State Highways = LOS D**

The element identifies specific actions and requirements for bringing into compliance locally owned transportation facilities and services that are below an established LOS standard. RCW 36.70A.070(6)(a)(iii)(D) and WAC 365-196-430(2)(g).

Concurrency policies must be consistent with RCW 36.70A.070(6)(b), and consider multimodal improvements RCW 36.70A.108. Strategies such as increased public transit, ride sharing programs, and other multimodal strategies may be used to ensure that development does not cause service to decline on a locally owned facility below adopted levels of service.

Concurrency

- d. The element describes existing and planned transportation demand management (TDM) strategies, such as HOV lanes, parking policies, high occupancy vehicle subsidy programs, etc. RCW 36.70A.070(6)(a)(vi). WAC 365-196-430(2)(i) provides suggested TDM strategies.

If required, a commute trip reduction plan to achieve reductions in the proportion of single-occupant vehicle commute trips has been adopted consistent with the comprehensive plan and submitted to the regional transportation planning organization. RCW 70.94.527.

TDM Strategies

1. **The City's Transportation policies emphasize multi-modal approaches including pedestrian paths, bicycle lanes and encouraging TDM measures.**
2. **The City maintains a CTR and TDM program**
3. **Community Transit has opened a Park and Ride facility in the City to add to its other services to the Arlington/Marysville area.**

- f. The element includes a pedestrian and bicycle component. RCW 36.70A.070(6)(a)(vii). WAC 365-196-430(2)(j) recommends jurisdictions inventory existing pedestrian and bicycle facilities, and identify and plan improvements for facilities. Improvements could focus on safe routes to school, hazard areas, or pedestrian-generating areas, and should be funded in capital facility or transportation improvement plans. See Bicycle and pedestrian planning information and resources at www.wsdot.wa.gov/Walk/default.htm and www.wsdot.wa.gov/bike/default.htm.

Bicycle and pedestrian planning

1. **See previous discussion. City policies and inventories show a strong commitment to pedestrian and bicycle users. (e.g. See Figure 2-7)**

- g. The element includes a forecast of traffic for at least 10 years, based on the Land Use Element, to provide information on the location, timing, and capacity needs of future growth. RCW 36.70A.070(6)(a)(iii)(E). WAC 365-196-430(2)(f) suggests including bicycle, pedestrian or planned transit service in a multimodal forecast. Forecasts should be consistent with regionally adopted strategies and plans.

The forecast should be based on assumptions in the land use element. RCW 36.70A.070(6)(a)(i). WAC 365-196-430(2)(a)(i) recommends counties and cities use consistent land use assumptions, population forecasts, and planning periods for both the land use and transportation elements.

10-year Traffic forecast

1. **See previous discussion of the City's 2035 Transportation Plan.**

Land use element assumptions used to forecast travel

1. **See previous discussion of the City's 2035 Transportation Plan.**

- h. The element identifies state and local system expansion needs to meet current and future demands. RCW 36.70A.070(6)(a)(iii)(F). WAC 365-196-430(2)(f) recommends including bicycle, pedestrian or planned transit service in needs.

WSDOT's Ten-Year Capital Improvement and Preservation Program for state-owned facilities (Required by RCW 47.05.030) is detailed in the Transportation Executive Information System <http://www.transinfo.state.wa.us/> Click on the current projects list, select the most recent legislative final project list and you can select projects by county.

Future needs

1. **See prior discussion regarding Arlington's involvement in regional transportation planning efforts and its adoption of County, multi-county, Vision 2040 policies.**

- i. A multiyear financing plan is included in the element based on the needs identified in the comprehensive plan, the appropriate parts of which serve as the basis for the six-year street, road, or transit program required by RCW 35.77.010 for cities, RCW 36.81.121 for counties, and RCW 35.58.2795 for public transportation systems. RCW 36.70A.070(6)(a)(iv)(B). WAC 365-196-430(2)(k)(ii) recommends that the horizon year be the same as the time period for the travel forecast and identified needs.

The analysis should assess the identified needs against probable funding resources. RCW 36.70A.070(6)(a)(iv)(A). WAC 365.196-430(2)(k)(iv) recommends counties and cities consider the cost of maintaining facilities when considering new facilities.

1. **See Chapter 8 and 9**
2. **See Transportation Plan.**
3. **The City has adopted policies emphasizing maintenance as a strategy for cost efficiency in providing the maximum level of quality to its transportation system. Examples:**
 - a. **MPP-T-2 Protect the investment in the existing system and lower overall life-cycle costs through effective maintenance and preservation programs.**
 - b. **PT-7.3 Prioritize the maintenance of roads according to condition, putting the roads in poor condition ahead of others.**
 - c. **PT-12.6 Direct resources to ensure that existing transportation system is maintained adequately.**

If probable funding falls short of meeting identified needs, there is a discussion of how additional funding will be raised, or how land use assumptions will be reassessed to ensure that LOS standards will be met. RCW 36.70A.070(6)(a)(iv)(C). WAC 365-196-430(2)(l)(ii) states that this review must take place, at a minimum, as part of the eight-year periodic review and update and update of UGAs [eight years per 2011 amendments to RCW 36.70A.130]. Several choices for addressing funding shortfalls are provided.

Funding program

Funding analysis

Funding shortfall strategy

1. See Chapters 8 and 9.

- j. The element discusses intergovernmental coordination efforts, including an assessment of the impacts of the transportation plan and land use assumptions on the transportation systems of adjacent jurisdictions. RCW 36.70A.070(6)(a)(v). WAC 365-196-430(2)(a)(iv) recommends developing transportation elements using the county-wide planning policies to ensure they are coordinated and consistent with the comprehensive plans of other counties and cities sharing common borders.

Intergovernmental coordination

1. **The Plan update is consistent with Countywide and Multi-County Planning Policies.**
2. **The Transportation Element is consistent with the Land Use Element which forms the basis for future traffic estimates.**
3. **Arlington is an active participant in countywide transportation planning efforts, including membership on the Snohomish County Committee for Improved Transportation (SCCIT), the Economic Alliance of Snohomish**

County and the Growth Management Steering Committee (SCT). Through collaboration among these groups, the major multi-modal transportation priorities have been identified, including those serving Arlington.

- k. The element discusses how the transportation plan implements and is consistent with the land use element, and how it is consistent with the regional transportation plan. RCW 36.70A.070(6) and WAC 365-196-430 WAC 365-196-430(2)(a)(i) recommends that consistent land use assumptions, population forecasts, and planning periods should be used for both the land use and transportation elements.

- 1. The 2005 Plan was used as a principal input to the new Transportation Plan**
- 2. The Public Works Director has been an active participant in the Staff team updating the Comprehensive Plan; while being the key coordinator with the consultant team updating the Transportation Plan.**

The transportation element must be certified by the regional transportation planning organization. RCW 47.80.23(3) and RCW 47.80.026.

Plan certified by RTPO

- 1. The Plan will be submitted for certification to the Puget Sound Regional Council.**
- 2. From the Transportation Plan:**

“The City of Arlington is a member of the Puget Sound Regional Council (PSRC), the Metropolitan Planning Organization (MPO) and Regional Transportation Planning Organization (RTPO) for King, Kitsap, Pierce and Snohomish Counties. PSRC is required to certify the transportation-related provisions in local comprehensive plans. By doing so, PSRC assures consistency with the multicounty planning policies in VISION 2040, the adopted regional transportation plan (Transportation 2040), and the requirements listed above for conformity with GMA.”

“The City of Arlington’s 2035 Transportation Plan supports the goals and strategies presented in PSRC’s VISION 2040 and Destination 2030 Update. Regional Growth Strategies, Multicounty Planning Policies and specific projects identified in the Destination 2030 Update have been incorporated in this document, and include:

- Sustainable transportation, including transit and non-motorized improvements*
- Higher density land use near transportation centers*
- Improvements to support freight mobility*
- Multiple east-west and north-south corridors to address disaster response*
- Access management*
- Context sensitive road standards*

- *Implementation of improvements of regional significance (trails, transit centers, park and rides)*
- *Complete streets providing for multi-modal transportation*
- *Connectivity with adjacent jurisdictions*
- *Transportation funding strategies”*

7. Economic Development Element

The Economic Development Element is not currently required because funding was not provided to assist in developing local elements when this element was added to the GMA. However, provisions for economic growth, vitality, and a high quality of life are important, and supporting strategies should be integrated with the land use, housing, utilities, and transportation elements. RCW 36.70A.070(7). An Economic Development Element should include:

- a. A summary of the local economy such as population, employment, payroll, sectors, businesses, and sales. RCW 36.70A.070(7)(a). WAC 365-196-435(2)(a) recommends using population information consistent with the land use and housing elements. Employment, payroll, and other economic information is available from state and federal agencies. Consider gathering data and information for your community data profile pertaining to business, transportation, labor, real estate, utilities, incentives, regulatory, government, and quality of life.
- b. A summary of the strengths and weaknesses of the local economy defined as the commercial and industrial sectors and supporting factors such as land use, transportation, utilities, education, work force, housing, and natural/cultural resources. RCW 36.70A.070(7)(b). WAC 365-196-435(2)(b) recommends consulting with local development organizations, economic development councils, or economic development districts. Methods for identifying strengths and weaknesses include shift-share analysis, identify of industry clusters, public input, and asset mapping.
- c. Identification of policies, programs, and projects to foster economic growth and development and to address future needs. RCW 36.70A.070(7)(c). WAC 365-196-435(2)(c) recommends identify policies, programs and projects that address identified weaknesses or capitalize on strengths identified by the community. Consider using performance targets to measure success.
 1. **The City has integrated its economic goals and policies with the Land Use, Employment, Capital Improvement and Planning Subarea analyses. These other elements form the basis of an economic strategy.**
 2. **A major emphasis in the 2015 Plan update is the “North Stillaguamish Valley Economic Redevelopment Strategy”, which is in response to the Oso tragedy. The study area extends from Darrington to Arlington. The strategy will have a major impact on the area’s economic programs and policies. The AAMIC¹ area and master plan will figure prominently.**

¹ Arlington-Marysville Manufacturing Industrial Center

3. **A second major emphasis in the 2015 Plan update is the AAMIC itself. Designation as such by the Puget Sound Regional Council is a major goal of the two cities and the Economic Alliance of Snohomish County. A final decision is likely in 2017. Significant work and analysis will be undertaken on this matter during that period. The Comprehensive Plan has helped set the stage for these next steps.**

8. Parks and Recreation Element

1. **Chapter 7**
2. **Existing parks are to be maintained in current and quality condition.**
3. **The City will cooperate with Snohomish County on maintenance and improvements to the Interurban Trail system.**

A Parks and Recreation Element is not required because the state did not provide funding to assist in developing local elements when this provision was added to the GMA. However, park, recreation, and open space planning are GMA goals, and it is important to plan for and fund these facilities. RCW 36.70A.070(8). Commerce's Guidebook Planning for Parks, Recreation, and Open Space in your Community, can provide step-by-step assistance. Also see www.rco.wa.gov/doc_pages/index.shtml for additional assistance. A Parks and Recreation Element should include:

- a. Goals and policies to guide decisions regarding facilities. WAC 365-196-440(2)(b) recommends a visioning process to engage the public in identifying needs, evaluating existing recreational opportunities, and developing goals for the parks and recreation element.
- b. Estimates of park and recreation demand for at least a ten-year period based on adopted levels of service and population growth. RCW 36.70A.070(8)(a). WAC 365-196-440(2)(c) recommends establishing levels of service standards that reflect community goals. LOS should focus on those aspects that relate most directly to growth and development.
- c. An evaluation of facilities and service needs over the planning period. RCW 36.70A.070(8)(b). WAC 365-196-440(2)(d) lists factors to consider when estimating demand for parks, open space and recreational services.
- d. An evaluation of intergovernmental coordination opportunities to provide regional approaches for meeting park and recreational demand. RCW 36.70A.070(8)(c). WAC 365-196-440(2)(f) recommends identifying other local, statewide and regional recreation plans for future facilities and opportunities for public and private partnerships to meet regional demand.
- e. The element is consistent with and is a part of the Capital Facilities Element as it relates to park and recreation facilities. RCW 36.70A.070(3)(e). WAC 365-196-440(2)(e) recommends identification of future facilities and services consistent with the land use and capital facilities elements. WAC 365-196-440(2)(g)(iii) recommends identifying strategies for financing in the parks and recreation element, a separate parks plan, or the capital facilities element.

9. Shoreline Element

The Shoreline Element of the comprehensive plan is the goals and policies of the Shoreline Master Program (SMP). RCW 36.70A.480 The SMP goals and policies may

also be included in an Environmental Element. The SMP goals and policies should be consistent with the rest of the comprehensive plan.

SMP goals and policies are included in the comprehensive plan. RCW 36.70A.480. When a jurisdiction updates its SMP consistent with Ecology's new guidelines (Chapter 173-26 WAC), and according to a schedule in RCW 90.58.080, protection for critical areas within shorelines is transferred from the critical areas ordinance to the SMP. Protection must be at least equal to that from the CAO under the GMA.

SMP goals and policies.

1. The City updated its Shoreline Master Plan in 2012 (Ordinance 2012-015) and requires no further adjustments as part of this GMA update.

10. Essential Public Facilities (EPFs)

Provisions for Siting Essential Public Facilities (EPFs) should be consistent with CWPPs, RCW 36.70A.200, and should consider WAC 365-196-340 and 550. This section can be included in the Capital Facilities Element, Land Use Element, or in its own element. Sometimes the identification and siting process for EPFs is part of the CWPPs.

- a. The plan includes a process or criteria for identifying and siting essential public facilities (EPFs). EPFs include those facilities that are typically difficult to site, such as airports, state education facilities, state or regional transportation facilities as defined in RCW 47.06.140, regional transit authority facilities as defined in RCW 81.112.020, state and local correctional facilities, solid waste handling facilities, and in-patient facilities including substance abuse facilities, mental health facilities, group homes, and secure community transition facilities(SCTF) (defined in RCW 71.09.020(14)). [RCW 36.70A.200(1)] WAC 365-196-550 provides a list of essential public facilities and suggests a potential siting process.

EPF identification and siting process

- b. Policies that address the statutory requirement that no comprehensive plan may preclude the siting of essential public facilities. RCW 36.70A.200(5). WAC 365-196-550(3) list types of comprehensive plan provisions or development regulations that could make the siting of an essential public facility impossible or impractical.

No preclusion policy

- c. Jurisdiction considered the Office of Financial Management's list of essential state public facilities that are required or likely to be built within the next six years. RCW 36.70A.200(4). (Instructions to find the list are available from GMS)

List considered

1. **See Appendix B**
2. **See Goals GS-2 and associated policies**
3. **Essential Public Facilities are acknowledged in the City Code.**

11. Optional plan elements and sub-area plans

Additional elements are included in the plan, such as energy conservation, historic preservation, natural hazards, or community design. [RCW 36.70A.080 and WAC 365-196-445] These elements should be consistent with all other elements of the plan. Resources: Historic Preservation: A Tool for Managing Growth, Commerce, 1994, revised in 2005, Optional Comprehensive Plan Element for Natural Hazard Reduction, Commerce, 1999.

If any sub-area plans included in the plan, they must be consistent with the other plan elements. RCW 36.70A.080(2).

1. Not applicable

12. Consistency

Consistency is required by the GMA

- a. All plan elements are consistent with relevant county-wide planning policies (CWPPs) and the GMA. RCW 36.70A.100 and 210 and WAC 365-196-400(2)(c) and 520. WAC 365-197-400(2)(c) suggests CWPPs be referenced in each element, or be appended to the plan to clearly show consistency. Some jurisdictions use a table to show consistency.

CWPPs

The plan describes how all elements fit together, such as consistency of plan elements and future land use map, and consistency of land use and capital facilities elements. RCW 36.70A.070 (preamble). WAC 365-197-400(2)(f) recommends inclusion at the beginning of the comprehensive plan a section which summarizes how the various pieces of the plan fit together.

Internal consistency

Plan is coordinated with the plans of adjacent jurisdictions. RCW 36.70A.100.

WAC 365-196-520 suggests counties and cities circulate their proposed plans and SEPA documents with other counties and cities with which they share a common border or has related regional issues. Counties and cities are encouraged to resolve conflicts through consultation and negotiation.

External consistency

1. **See Appendix C.**
2. **Plan will be shared with Marysville and reviewed for consistency by the County.**

13. Public participation, plan amendments and monitoring

Plan ensures public participation in the comprehensive planning process. RCW 36.70A.020(11), .035, and 140. WAC 365-196-600(3) provides a list of possible public participation choices.

Public participation

If the process for making amendments is included in the comprehensive plan:

- The plan provides that amendments are to be considered no more often than once a year, not including the exceptions described in RCW 36.70A.130(2). WAC 365-196-640
- The plan sets out a procedure for adopting emergency amendments and defines emergency. RCW 36.70A.130(2)(b) and RCW 36.70A.390, WAC 365-196-650(4)

Broadly publicized plan amendment process.

Plan amendments no more than once a year.

- a. Plan or program for monitoring how well comprehensive plan policies, development regulations, and other implementation techniques are achieving the comprehensive plan's goals and the goals of the GMA. WAC 365-196-660 discusses a potential review of growth management implementation on a systematic basis.

1. **No major changes in City permit review procedures are anticipated.**
2. **The Plan will be reviewed each year for any specific language changes are prompted by circumstances.**
3. **Citizens will have the opportunity to suggest changes each year as part of the annual amendment (docket) process.**