



# RESPONSE TO PUGET SOUND REGIONAL COUNCIL

## Appendix Q

# Responses to Comments from Puget Sound Regional Council

## Appendix Q—Arlington 2024 Comprehensive Plan

### Regional Growth Strategy

Plan Review Consistency Tool	PSRC Comment on Draft Plan	City of Arlington Responses
<p>Use land use assumptions substantially consistent with countywide growth targets (RCW 36.70A.070, WAC 365-196-430, VISION 2050 Regional Growth Strategy)</p> <p>Use consistent land use assumptions throughout plan (RCW 36.70A.070, WAC 365-196-430)</p>	<p>The plan’s growth targets in the land use and transportation elements should be internally consistent and aligned with the Snohomish County CPPs.</p> <p>The growth targets presented in the land use supporting analysis should reference the values indicated in the Snohomish County CPPs for the city of Arlington. The same values for housing and employment should be used the transportation modeling analysis, rather than the jurisdiction’s total capacity (as shown in Table 4-1 of the Transportation Master Plan).</p>	<p><b>The growth targets presented in the supporting analysis of the final comprehensive plan are aligned with the growth targets allocated by Snohomish County to the City of Arlington.</b></p> <p><b>The environmental impact statement analysis and land capacity analysis work evaluated multiple growth scenarios, INCLUDING a scenario that aligns with the allocated growth targets by Snohomish County CPPs.</b></p> <p><b>All capital projects planning, including the Transportation improvements listed in the Transportation Master Plan are aligned with the 20-year growth targets allocated to the City by Snohomish County.</b></p>
<p>Demonstrate sufficient zoned development capacity to accommodate targets (RCW 36.70A.115)</p>	<p>The plan indicates a desire to expand the UGA. VISION supports a stable UGA, recognizing the transportation and environmental challenges with serving an expanded urban area. Growth in perimeter areas is often more costly to serve than urban areas, and UGA expansions should be based on identified countywide need. Consideration of expanding the UGA should fully address such impacts.</p>	<p><b>The City anticipates that growth may occur more rapidly in the coming years than forecasted, and as such, the City may then have limited capacity to meet targets for housing and employment during the next Comprehensive Plan update cycle. The potential for UGA expansion would be thoroughly studied following state, regional, and county requirements and would address potential impacts as noted in PSRC’s comment.</b></p>
<p>Work towards annexation and the orderly transition of unincorporated urban areas by:</p> <ul style="list-style-type: none"> <li>• Joint planning and urban development standards for urban unincorporated areas</li> <li>• Affiliating all unincorporated urban growth areas with adjacent cities</li> <li>• Planning for phased growth of communities to be economically viable, supported by planned urban infrastructure, and served by public transit (MPP-RGS-16, DP-27-30)</li> </ul>	<p>The plan should include policy supporting coordination with the county to plan for annexation of all unincorporated areas of the MUGA by the end of the planning period.</p>	<p><b>This policy is included in the final plan. Please refer Land Use Book, Goal 8, Policy LU-8.8 - <i>Coordinate with Snohomish County to annex all areas within Arlington’s MUGA, to the extent feasible, by then end of this planning period.</i></b></p>

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## Appendix Q—Arlington 2024 Comprehensive Plan

### Centers

PSRC Review Consistency Tool	PSRC Comment on Draft Plan	City of Arlington Responses
<p>Maximize the use of existing designated manufacturing/ industrial centers by protecting them from incompatible adjacent uses (MPP-Ec-22)</p>	<p>The plan’s projected housing growth pattern indicates significant housing growth within the city’s manufacturing/industrial center. MICs are designated to preserve land for industrial uses and to avoid incompatibilities. The plan should include policies to avoid planning for new housing in the MIC and ensure that the MIC subarea plan includes strategies to minimize incompatible uses.</p>	<p><b>The City did complete a rezone in 2020 along 204<sup>th</sup> Street between 67<sup>th</sup> Avenue NE and State Route 9. This area was zoned General Commercial with Mixed-Use Overlay and was changed to Commercial Corridor (essentially the same zoning). Under this zoning, previous and current, did not allow for industrial uses to occupy the property. Also, these properties have vital street frontage. The industrial center designation area split the mixed-use zoning with a narrow path. It does not make sense to destroy the street frontage by not allowing for a walkable commercial and residential atmosphere within a growing hub. This is a relatively small area, when compared to the entire industrial center. At the same time and under the same ordinance, the city rezoned property from Highway Commercial to Light Industrial (Amazon Property) under Ordinance No. 2020-019.</b></p> <p><b>The City completed a Planned Action for the Cascade Industrial Center (CIC) in 2021 for the Arlington portion of the manufacturing-industrial center, under Ordinance No. 2021-002. This document allowed work force housing within the CIC at certain levels and was completed after the rezone along 204<sup>th</sup> Street. The Planned Action was approved by PSRC.</b></p> <p><b>The City has since rezoned additional property within the CIC from General Commercial to Light Industrial in 2024, under Ordinance No. 2024-012</b></p> <p><b>City is required to provide for housing in close proximity to jobs, reducing the need for in-city trips. These areas will be served by transit in the future.</b></p>

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## Appendix Q—Arlington 2024 Comprehensive Plan

### Centers, continued

PSRC Review Consistency Tool	PSRC Comment on Draft Plan	City of Arlington Responses
<p>Include growth targets for designated regional growth centers and manufacturing/industrial centers (MPP-RGS-2)</p> <p>The Cascade Industrial Center Subarea Plan should be revised to incorporate employment targets to 2044.</p>	<p>The plan should include employment targets specific to the Cascade Industrial Center.</p>	<p><b>The growth targets for the manufacturing/industrial center of Cascade Industrial Center were published in that subarea plan (Arlington-Marysville Manufacturing industrial Center Subarea Plan: <a href="https://www.arlingtonwa.gov/DocumentCenter/View/1711/AMMIC-Arlington-Subarea-Plan">https://www.arlingtonwa.gov/DocumentCenter/View/1711/AMMIC-Arlington-Subarea-Plan</a>)</b></p> <p><b>With more information available here: <a href="https://www.arlingtonwa.gov/575/Cascade-Industrial-Center">https://www.arlingtonwa.gov/575/Cascade-Industrial-Center</a></b></p> <p><b>The Comprehensive Plan team referenced the subarea plan as part of the planning work, including the employment targets of the Cascade Industrial Center. All transportation, utilities, and other infrastructure planning work assumes these targets as relevant for the next 20-years of growth in Arlington.</b></p>
<p>Jurisdictions with regional centers: Support the update of regional center subarea plans to be consistent with the revised Center Plan Tools (DP-Action-8)</p>	<p>Please note that PSRC will complete an in-depth review of regional centers in 2025 following comprehensive plan updates. Existing regional manufacturing/industrial centers are expected to meet the standards identified in the <a href="#">Regional Centers Framework</a> to ensure redesignation. Please see the <a href="#">Manufacturing/Industrial Center</a> checklist for more information about planning criteria.</p>	<p><b>The City of Arlington will be reviewing the subarea plan with Marysville and PSRC in 2025 to determine necessary updates and amendments to be made to the subarea plan by 2026.</b></p>

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### Transit Oriented Development

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<p>Jurisdictions with or planning for high- capacity transit stations: Identify high- capacity station areas and plan for densities that maximize benefits of transit investments (MPP-DP-22, DP-Action-8)</p>	<p>The Community Transit Swift Gold Line will extend to Arlington by 2029. The plan should address how the city intends to connect housing and employment in the Smokey Point and CIC subareas to future BRT stations.</p>	<p><b>The City of Arlington intends to complete a Subarea Plan for Smokey Point that integrates affordable housing and transit-oriented development planning starting in the next couple years. The Comprehensive Plan includes Section III. Subareas with specific content for the Smokey Point corridor (see page 19 of Section III of the Comprehensive Plan).</b></p>
<p>Jurisdictions planning for high-capacity transit stations: Create and preserve affordable housing near high-capacity transit (MPP-H-8, H-Action-1)</p>	<p>The plan should include policies for preservation and/or development of affordable housing near the planned BRT stations of the Community Transit Swift Gold Line, which is anticipated to start service in 2029.</p>	<p><b>The plan includes content for the Smokey Point Subarea, see page 19 of Section III) and provides a vision for a range of housing types and densities near the planned BRT station.</b></p> <p><b>The City will be revising the Mixed Use provisions of the Code in 2025 to support future implementation of TOD.</b></p> <p><b>Also see response immediately above.</b></p>

### Racially Disparate Impacts and Residential and Commercial Displacement

Plan Review Consistency Tool	PSRC Comment on Draft Plan	City of Arlington Responses
<p>Evaluate planning in areas for potential residential and commercial displacement and use a range of strategies to mitigate displacement impacts (MPP-DP-23, Ec-12)</p>	<p>The plan’s racially disparate impact analysis identifies several areas that may redevelop and create displacement, especially around the Smokey Point area. In support of the plan’s policy (LU-10.5) the city is encouraged to identify specific strategies to mitigate the impacts of residential and commercial displacement.</p>	<p><b>The City of Arlington has completed an analysis of the potential for racially disparate impacts and has identified potential strategies to mitigate residential and commercial displacement as part of the planning work on the Comprehensive Plan. See Appendix B to the plan: <a href="#">Appendix-B-Racially-Disparate-Impacts-Analysis</a>.</b></p> <p><b>The City will continue to evaluate and implement potential displacement strategies, referencing the Department of Commerce RDI Guidebook and other guidance. This work will continue as part of ongoing planning for the Smokey Point Subarea, related transit-oriented development planning, and the affordable housing program.</b></p>

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### Transportation

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<p>Provide travel demand forecasts and identify state and local system projects, programs, and management necessary to meet current and future demands and to improve safety and human health (RCW 36.70A.070, MPP-T-4-5)</p>	<p>Travel demand forecasts (Table 4-1 of TMP) do not match growth targets. The land use assumptions used for travel demand modeling and project identification must be consistent with the Snohomish County adopted growth targets for housing and employment. See also prior comment under Regional Growth Strategy.</p>	<p><b>The City adjusted the transportation analysis to ensure that it matches the growth targets allocated to Arlington by Snohomish County. The transportation analysts had also looked at a more aggressive growth alternative as part of the EIS analysis and had been evaluating potential project needs based on that growth scenario. The project list that is reflected in the Comprehensive Plan adopted by the City aligns with the 20-year growth targets allocated to Arlington by Snohomish County.</b></p>
<p>Identify maintenance and system preservation projects and programs necessary to maintain the ability of the transportation system to provide safe, efficient, and reliable movement of people, goods, and services (RCW 36.70A.070, MPP-T-1-2, T-4)</p>	<p>The City is encouraged to include maintenance and system preservation projects in the plan’s transportation project list and cost summary.</p>	<p><b>The City will be completing the Transportation Master Plan in 2025, and the City anticipates maintenance and system preservation projects and programs would be included in the final plan.</b></p>
<p>Include a 20-year financing plan, as well as an analysis of funding capability for all transportation modes (RCW 36.70A.070(3), RCW 36.70A.070(6)(a)(iv), WAC 365-196-415, WAC 365-196-430, MPP-RC-11-12, T-6, T-15)</p>	<p>The plan should include an analysis of funding sufficiency, including identification of potential funding sources to address gaps. The <a href="#">Department of Commerce’s Transportation Element Guidebook</a> (pp. 202-212) is a helpful resource for this work.</p>	<p><b>The City is preparing a 20-year financing plan as part of its Transportation Master Plan, which will be completed in 2025. A draft of the Transportation Master Plan is provided as <a href="#">Appendix H to the Comprehensive Plan: Appendix-H---Draft-Transportation-Master-Plan</a>. The City has established a Transportation Benefit District to support funding needed transportation improvements.</b></p>
<p>Ensure mobility choices for people with special needs (MPP-T-10)</p>	<p>If the city has completed an ADA transition plan, it should be incorporated into the plan by 2029 per HB 1181.</p>	<p><b>This is the City’s intent – to ensure mobility choices for people with special needs. The City’s ADA Transition Plan is being developed and aims to prioritize areas with higher pedestrian traffic levels, including school zones, hospitals, and areas with a high level of retail uses. The City of Arlington anticipates that annual roadway and pavement preservation projects will also correct ADA accessibility at a number of intersections.</b></p>

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### Housing

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<p>Address affordable housing needs by developing a housing needs assessment and evaluating the effectiveness of existing housing policies, and documenting strategies to achieve housing targets and affordability goals. This includes documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations (H-Action-4)</p>	<p>The plan indicates an emergency housing capacity analysis will be completed. This analysis should be included in the final plan, documenting sufficient capacity in line with Commerce’s <a href="#">Guidance for Updating your Housing Element (Book 2)</a>.</p>	<p><b>The City has completed an assessment of emergency housing capacity and has confirmed that more than sufficient capacity exists. Refer to Appendix E to the Comprehensive Plan, here: <a href="#">Appendix-E---Emergency-Housing-Template</a></b></p>
<p>Identify potential physical, economic, and cultural displacement of low- income households and marginalized populations and work with communities to develop anti-displacement strategies in when planning for growth (MPP-H-12, H-Action-6)</p>	<p>The city is encouraged to elaborate on what anti-displacement strategies will be considered, consistent with the plan’s policies (LU-10.5, H-4.4). PSRC’s <a href="#">Housing Opportunities by Place</a> can be a useful resource.</p>	<p><b>The City of Arlington has completed an analysis of the potential for racially disparate impacts and has identified potential strategies to mitigate residential and commercial displacement as part of the planning work on the Comprehensive Plan. See Appendix B to the plan: <a href="#">Appendix-B---Racially-Disparate-Impacts-Analysis</a>.</b></p> <p><b>The City will continue to evaluate and implement potential displacement strategies, referencing the Department of Commerce RDI Guidebook, PSRC’s Housing Opportunities by Place, and other guidance. This work will continue as part of ongoing planning for the Smokey Point Subarea, related transit-oriented development planning, and the affordable housing program.</b></p>

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### Environment/Climate Change

Plan Review Consistency Tool	PSRC Comment on Draft Plan	City of Arlington Responses
Identify open space, trail, and park resources and needs, and develop programs for protecting and enhancing these areas (MPP-En-11-12, En-15, En- Action-4)	Consistent with VISION 2050 and national best practices, PSRC recommends including a policy and parks level-of-service to provide parks within a 10-minute walk of all residents. PSRC uses the Trust for Public Land’s ParkServe mapping tool to identify park gaps. <a href="#">ParkServe</a> shows that 62% of Arlington’s residents live within a 10-minute walk of a park.	<p><b>The City’s Parks and Recreation Master Plan is included as Appendix G to the Comprehensive Plan, here: <a href="#">Appendix-G---Parks-and-Recreation-Master-Plan</a></b></p> <p><b>The Parks and Recreation Master Plan includes mapping showing 5-minute walk distances to parks and schools (see page 25 of the Parks and Recreation Master Plan).</b></p> <p><b>Policy P-6.3 of the Parks Book of the Comprehensive Plan addresses this: <i>Aligning with the level of service standards in the Parks and Recreation Master Plan, locate a park, trail, open space area, or recreation facility within a five minute walking distance of all Arlington residents.</i></b></p>
Address impacts to vulnerable populations and areas that have been or will be disproportionately affected by climate change (MPP-CC-6, CC-8, CC- Action-3, CC-Action-4)	The plan includes several policies to adapt to climate change impacts. The city is encouraged to continue this work by identifying community and population vulnerabilities as part of compliance with HB 1181 by 2029. Commerce’s <a href="#">Climate Planning guidance</a> may be a useful resource.	<p><b>Policy E-2.2 in the Environment Book of the Comprehensive Plan addresses this: <i>Reduce impacts to vulnerable populations and areas that have been disproportionately affected by noise, air pollution, and other environmental impacts, including climate change.</i></b></p> <p><b>The City of Arlington intends to complete climate and resiliency planning prior to or in alignment with the 2029 timeline.</b></p>

### General

Plan Review Consistency Tool	PSRC Comment on Draft Plan	City of Arlington Responses
Explore funding sources, changes to regulatory, pricing, taxing, and expenditure practices, and other fiscal tools to meet infrastructure and other needs (MPP-RC-10-11, RC-Action-7, RC-Action-9)	The increased development capacity created by the plan provides the opportunity to further develop a transfer of development rights (TDR) program, and pursue revenue incentives, such as <a href="#">the Landscape Conservation and Local Infrastructure Program (LCLIP)</a> . These programs can help the city to gain access to flexible infrastructure funding and support goals for both growing neighborhoods and conserving open space.	<p><b>Thank you for your comment. The City of Arlington allows for participation in the Snohomish County TDR program.</b></p>

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## Appendix Q—Arlington 2024 Comprehensive Plan

### General, continued

Support inclusive community planning (MPP-DP-2, MPP-DP-8)	The city is encouraged to include a summary of the community engagement process conducted to develop the plan.	<b>Refer to the Comprehensive Plan Introduction section for a summary of engagement activities. Appendix K provides an in-depth summary of community engagement conducted to develop the Comprehensive Plan: <a href="#">Appendix-K--Public-Engagement-and-Outreach-Summary</a></b>
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PSRC has resources available to assist the city in addressing these comments and inform development of the draft plan. We have provided links to online documents in this letter, and additional resources related to the plan review process can also be found at <https://www.psrc.org/planning-2050/vision/vision-2050-planning-resources>.

We appreciate all the work the city is doing and the opportunity to review and provide comments. We are happy to continue working with you as the draft progresses through the adoption process. If you have any questions or need additional information, please contact me at 206-464-6172 or [ddixon@psrc.org](mailto:ddixon@psrc.org).

**The City of Arlington thanks you for your comments and PSRC’s ongoing support and willingness to support our planning efforts.**