

## **Appendix G:**

# **Response to Certification Review Puget Sound Regional Council**

## **RE: PSRC Final Certification**

### **City of Arlington Comprehensive Plan**

This letter transmits the 2017 Comprehensive Plan update now pending approval by the Arlington Planning Commission and City Council. The City's 2015 Plan has been granted Conditional Certification by the PSRC (March 2016) with Final Certification dependent on several modifications proposed by PSRC staff. On the following pages you will see the results of an extensive effort by the City to address those recommendations. We appreciate your prior comments regarding the "exemplary" aspects of our Plan and believe the following information will complete the certification process. We have organized the following summary around the format of your 2016 review. With this letter, we ask that Final Certification be concluded.

### **GMA Vision2040 and Transportation 2040 Conformity**

#### PSRC Discussion<sup>1</sup>:

According to the PSRC review document, Arlington's Plan must conform to:

- established regional guidelines and principles,
- the adopted long-range regional transportation plan, and
- transportation planning requirements of RCW 47.80.026. The multicounty planning policies in VISION 2040 encompass these requirements.

#### Response:

To summarize our work in 2016-17:

1. Population, housing and employment targets have been updated consistent with the Snohomish County Tomorrow reconciliation process.
2. The County will confirm that with other certain Reasonable Measures discussed below, there is sufficient capacity to accommodate those targets.
3. The City is proceeding with adoption of these measures and reconciled target figures as part of its 2017 Plan update. Plan adoption will occur in late summer, 2017.
4. The updated Plan incorporates and applies the multicounty planning policies and Snohomish County Planning Policies.

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<sup>1</sup> PSRC Plan Review Report, March 31, 2016, Page 1 Paragraph 1

### PSRC Discussion:

At our meeting with PSRC in April 2016 to discuss the City's Transportation Plan there were several suggestions for modification to allow PSRC certification.

#### **1.4.3 Consistency with DESTINATION 2040 and VISION 2040**

### Response:

1. The Plan update includes a revised Transportation Element based upon the City's "2035 Transportation Plan" (2016). The Transportation Plan will be adopted by reference in the Comprehensive Plan. It includes:
  - a. Discussion of conformity with Vision 2040 and Transportation 2040 (Section 1.4.3 of the Transportation Plan)
  - b. Confirmation of land use assumptions
  - c. Compliance with state requirements for nonmotorized transportation
  - d. A multiyear transportation financing plan.
2. A graphic showing an inventory of dedicated bike lanes in city streets has been completed. (Figure 2-7).
3. A table summarizing miles of sidewalks, multiuse trails, and bike lanes has been added and is discussed in the Comprehensive Plan beginning at Page 8-7.
4. A new table has been added to Section 6 for "Trail Projects" with cost estimates. This table is also contained in the updated Comprehensive Plan.
5. The 2035 Capital costs in Section 7 will include "Trail Projects" that were added to Section 6.
6. The current Plan now reflects the City's decision not to expand west of I-5.

Responding to the specific detail of your March report:

#### **Conformity with Transportation Planning Requirements (Part I)**

### PSRC Discussion:

The adopted plan references data, analysis, and policies developed in 2010 as part of an earlier effort to update the city's transportation master plan. The city is currently working toward adoption of a revised transportation master plan, which may be used to respond to the issues highlighted below<sup>2</sup>.

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<sup>2</sup>PSRC Plan Review Report, Page 3, Discussion: Conditions for Certification, first bullet

Response:

The City's update Transportation Plan was adopted in May, 2016 and has been integrated into the GMA Comprehensive Plan.

**“Use consistent future land use assumptions across all plan elements and document how those assumptions align with adopted growth targets”<sup>3</sup>**

PSRC Discussion:

. The transportation analysis in the adopted plan is not well documented and does not make clear how forecasts of travel demand relate to adopted growth targets or the land use element. The transportation element should be amended to clearly document land use assumptions and to demonstrate consistency with adopted growth targets.”

Response:

The City adopted its updated Transportation Plan in August 2016. As noted on Page ES-1:

*“ Arlington’s Transportation 2035 Plan follows PSRC’s integrated long-range growth management, environmental, economic, and transportation strategy contained in VISION 2040. It implements the strategies developed in TRANSPORTATION 2040 focusing on congestion and mobility, environment, and funding.”*

Additionally, Appendix F of the GMA Plan (“Supplemental Environmental Impact Statement -- Response to Comments” addressed the PSRC comments in the Conditional Certification.

**Include a complete and updated multiyear financing plan for transportation<sup>4</sup>**

PSRC Discussion:

“The Growth Management Act (see RCW 36.70A.070(6)) requires that the transportation element include a financing plan that addresses:

- Cost estimates for roadway, pedestrian, and bicycle improvements identified in the plan as needed over the 20-year planning period.

Response

Chapter 8 of the Comprehensive Plan (“Transportation”) embraces elements of the 2035 Transportation Plan and provides a long term and six-year plan for motorized and non-motorized improvements. These are now elements of the City’s Capital Facilities Plan (See Chapter 9). PSRC staff will find that these elements are consistent with Vision 2040 and Transportation 2040.

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<sup>3</sup> PSRC Plan Review Report, Page 3, last paragraph

<sup>4</sup> PSRC Plan Review Report, Page 4, first bullet

The County GMA Comprehensive Plan includes a section referred to as the “Goal 12 Reassessment Policy” which outlines an approach when transportation or other capital facilities have been included as Appendix will be amended into the Arlington Comprehensive Plan during this recertification process.

**“Inventory existing and planned nonmotorized facilities”<sup>5</sup>.**

PSRC Discussion:

While the plan includes notable policies that address pedestrian and bicycle facilities, additional work is needed to complete the pedestrian and bicycle component of the transportation element. The plan should include

- a map or list of sidewalks and bicycle facilities
- identification of a network of nonmotorized facilities
- a project list to construct the network within 20 years

Response:

Figure 2-7 and Table 8-6 in the Comprehensive Plan and Table 3-2 in the Transportation Plan show the items listed by PSRC. The “policies that address pedestrian and bicycle facilities” remain in the final Plan.

**Consistency**

PSRC Discussion:

The multicounty planning policies in VISION 2040 and the strategies in Transportation 2040 call for reducing greenhouse gas emissions and adapting to impacts related to climate change. See page 42 of VISION 2040 for an overview of climate change and related policies and page 34 in Transportation 2040 for information on the four-part greenhouse gas reduction strategy (land use, user fees, choices, and technology)...Consider directly addressing the climate change-related multicounty planning policies and including additional strategies such as emissions reductions from municipal operations and additional transportation demand management strategies.”<sup>6</sup>

Response:

The City believes it has a firm policy base regarding air quality and climate change.

PL-18.6The City should promote reducing air pollution emissions associated with land uses and

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<sup>5</sup> PSRC Plan Review Report, Page 4, second bullet

<sup>6</sup> PSRC Plan Review Report, Page 5, last sentence

transportation in accordance with national, State, regional, and local policies and standards.

#### Air Quality

*Minimize air quality impacts caused by the transportation system*

#### Policies:

PT-13.1 The City commits to meeting federal and State air quality requirements and work with the State, region and local agencies or jurisdictions to develop transportation control measures and/or similar mobile source emission reduction programs that may be warranted to attain or maintain air quality requirements.

PT-13.2 The City's transportation system will conform to the federal and State Clear Air Acts by maintaining its conformity with the Metropolitan Transportation Plan of the Puget Sound Regional Council and by following the requirements of Chapter 173-420 of the Washington Administrative Code, which may include development of transportation

The City will work with other jurisdictions as more specific climate change policies evolve.

### **Development Patterns – including Regional Growth Strategy**

#### PSRC Discussion:

The adopted comprehensive plan does not fully provide sufficient development capacity to accommodate the growth targets in the city. In order to fully comply with the Growth Management Act, the plan should be amended to rectify the discrepancy between the adopted targets and future land use capacity provided by the comprehensive plan within the city limits. Options include the following:

- Work with Snohomish County to adjust the growth targets through reconciliation, consistent with the Regional Growth Strategy, to reflect future growth in Arlington that can be accommodated by the land use plan over the planning period.<sup>7</sup>

#### Response:

In July 2016 the City concluded discussions with Snohomish County with the County Staff recommending approval of Arlington's Growth Target Reconciliation proposal. The Planning Commission recommended unanimous approval and the County Council adopted Ordinance 16-077

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<sup>7</sup> PSRC Plan Review Report, Page 6, last bullet

on October 12th. The Ordinance amends the General Policy Plan and adopts the finding of the Growth Target Reconciliation process. Section 1(O) summarizes the outcome of the Arlington reconciliation process:

*“ Based on information provided by the City of Arlington subsequent to its request on May 10, 2016, to withdraw its ARL3 proposal from the county’s Final Docket XVII, the GPP10 proposal includes capacity revisions from the City of Arlington which indicate that the city and its unincorporated UGA could accommodate the 2035 population and housing targets currently adopted in Appendix D of the county’s GPP within the current Arlington UGA boundaries through consideration of reasonable measures to increase capacity within the city. The City of Arlington’s revised employment capacity estimates also indicate that the city and its unincorporated UGA could accommodate the 2035 employment targets currently adopted in Appendix D of the county’s GPP within the current Arlington UGA boundaries. ”*

- Amend the plan, including land use, transportation, housing and other relevant elements, to reflect and affirmatively plan for the targeted growth, including provision of sufficient land uses and densities.<sup>8</sup>

Response:

As a follow up to the Target Reconciliation effort, the City has taken several actions as part of its 2017 docket process:

1. The 2014 proposed UGA expansion west of I-5 has been withdrawn.
2. The “Brekhus-Beach” subarea has been designated to receive an urban density level of development of 5.5 dwelling units per acre du/acre, predicated upon the installation of public infrastructure e.g. water, sewer and roadway capacity improvements. (See Figure 2-22 and Policies PL-15.50 – 52 of the Plan)

Until these elements are in place the area can only develop to the densities allowed in the Suburban Residential Zoning because the parcels would still be reliant on individual septic systems. The City will implement a “Shadow Platting” process for the area, which will allow development at the current suburban residential density, subject to a plan for re-division to smaller lots once infrastructure is in place.

3. The City will replace its TDR program in the West Arlington Subarea with a more practical set of reasonable measures that better respond to investor market needs. These will include Mixed

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<sup>8</sup> PSRC Plan Review Report, Page 7, first bullet

Use, density bonuses and use of some TDR credits in mixed-use rather than strictly residential settings. There will be a heavy emphasis on mixed-use overlays to encourage higher densities, integrated pedestrian networks, public amenities, underground parking, etc.

The County will confirm that with these Reasonable Measures, there is sufficient capacity to accommodate those targets. The City is proceeding with adoption of these measures and reconciled target figures as part of its 2017 Plan update (docketing).

PSRC Discussion:

“The plan contains many policies that support development of a manufacturing/industrial center and a compact, mixed-use and pedestrian-oriented business district. Policies that prioritize transportation, public realm, and other investments in the city’s centers would strengthen the plan’s support for development in these locations. Communities should prioritize infrastructure funding within their identified centers.”<sup>9</sup>

Response:

Arlington has been an active participant in the PSRC Centers Framework study which is still in process. The City, along with Marysville and Snohomish County show a proposed Manufacturing Industrial Center (MIC) in the 4,019 acres area between the two cities. Approximate 1,762 acres is developable as industrial land, with access to I-5, local arterials, the Arlington Airport and the fast freight rail corridor extending from Canada through Puget Sound. The proposed MIC is a part of the North Puget Sound Manufacturing Corridor. Final Centers designations by PSRC are expected in early 2018.

**Transportation**

PSRC Discussion:

“The transportation and other plan elements have many policies supportive of walking, biking and transit. Implementation of these policies would be strengthened through adoption of levels of service and a concurrency approach that includes multiple modes.”<sup>10</sup>

Response:

The City believes that it has adopted a firm policy base to provide adequate concurrency and LOS review:

On Page 1-10, the 2016 Transportation Plan states:

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<sup>9</sup> PSRC Plan Review Report, Page 7, “Discussion: Areas for Further Work (Development Patterns)”

<sup>10</sup> PSRC Plan Review Report, Page, “Discussion: Areas for Further Work”

*“The Growth Management Act requires that transportation facilities are to be in place at the time development is completed or that a commitment has been made to complete the facilities within six years. For transportation facilities, the City has adopted a transportation impact fee to be assessed to all development projects within the city based upon the PM peak hour trips generated by the project and to be used for system improvements reasonably related to the new development. As a part of the SEPA review of a project, potential impacts to the transportation network are identified and mitigation is required to ensure the City’s LOS standards are met concurrent with the additional travel demand generated by each development project. Nonmotorized, pedestrian, and other multimodal options are considered and are included in required mitigation. The City of Arlington also has entered into an interlocal agreement with Snohomish County for reciprocal mitigation of transportation impacts.”*

Other policies in the Transportation Plan address concurrency. The GMA Comprehensive Plan restates these policies to establish the relationship to GMA goals and the City’s development policies.

- PT-3.3 Ensure that all development permits that are approved require transportation improvements that are in accordance with Arlington's ability to provide and/or maintain the adopted Levels of Service.
- PT-3.4 Traffic impacts of proposed projects should be determined through project-provided impact assessment reports, which should be required of every project for which the concurrency test must be applied. The City may waive this requirement where such impacts may be determined administratively and/or the project applicant agrees to mitigate any administratively determined impacts.
- PT-3.5 Permits should not be issued for the development of any property until and unless the transportation facilities identified in this plan are in place. This includes roads (including curb, gutter, sidewalks, and planter strips), trails, or other transportation facilities described in this Transportation Plan within the confines of that property.
- PT-12.2 New developments should be required to pay for improvements related to the development, including upgrading of existing facilities, on a proportionate share basis and according to calculated impacts to existing LOS.
- PP-1.1 The following Level of Service Standards for parks, trails, and opens space should be established throughout the City:

- d) Trails = 1.4 mi/1,000 people

- PP-1.5 Any required park, trail, and open space mitigation should be based on the City's adopted Level of Service Standard for the particular facility being impacted.
- PS-1.5 The City of Arlington should not issue any development permits that result in a reduction of the transportation Level of Service standard for the public facilities identified in the Capital Facilities Element without mitigation.

## **Public Services**

### PSRC Discussion:

The city should address the following comment at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:

Please consider adding a policy on connection to the sewer system to address<sup>11</sup>:

MPP-PS-9: Serve new development within the urban growth area with sanitary sewer systems or fit it with dry sewers in anticipation of connection to the sewer system. Alternative technology to sewers should only be considered when it can be shown to produce treatment at standards that are equal to or better than the sewer system and where a long-term maintenance plan is in place

### Response:

As indicated in Appendix C, Page C-1, the City has adopted the Multi-County Planning Policies PS-1 thru PS-16 (Including PS-9). MPP – PS -9 has also been added as a new policy in the Brekhus Beach section of the Plan (See Page 3-16).

The following policies are in place for the largest unplanned parcel in the City.

PL-15.50 *After the adoption of a "high-level" Master Plan for the Brekhus-Beach Subarea, "large-lot" subdivisions should be permissible in those portions of the subarea where the extreme cost or difficulty in extending sewer exists. With regards to this policy, "large-lot" means the minimum lot size required by the Snohomish County Health District for on-site sewage disposal systems. After the adoption of a "high-level" Master Plan for the Brekhus-Beach Subarea, shadow platting should be permissible in those areas where sewer is not yet available so as not to preclude the allowed underlying density at such a time when sewer becomes available. When sewer becomes available to serve the shadow plat, all lots within the plat will be required to connect to sewer.*

Arlington Code 13.08.130(a)(1) requires connections to the municipal system:

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<sup>11</sup> PSRC Plan Review Report, Page 7, last sentence "Discussion: Areas for Further Work"

*“ All structures which contain facilities for the disposal of sewage shall connect to the public sewer system unless a variance is granted pursuant to subsection (b) of this section. When sanitary sewer service is not available and is required, the utility shall require the property owner to install a sewer main extension.”*