

Local Comprehensive Plans Certification Report City of Sultan Comprehensive Plan

March 27, 2025



The Puget Sound Regional Council conducted a certification review of the City of Sultan comprehensive plan. Sultan adopted their 2024 comprehensive plan update on December 5, 2024. PSRC staff provided comments on the draft plan in October 2024 to inform the final plan adopted by the city.

This document is organized into two primary parts: a statement of certification and any applicable conditions to certification; and a discussion of conformity with the Growth Management Act and consistency with VISION 2050 by topic area.

Certification Action

The Puget Sound Regional Council certifies that the transportation-related provisions in the City of Sultan 2024 comprehensive plan conform to the Growth Management Act and are substantially consistent with multicounty planning policies and the Regional Transportation Plan.

Within the central Puget Sound region, local governments and PSRC have worked together to develop an overall process for reviewing and certifying local, countywide, regional center, and long-range transit plans.¹ Transportation-related provisions that are key for certification are based on RCW 47.80.026 and the Growth Management Act (RCW 36.70A). This report may recommend additional work to fully address the requirements of the Growth Management Act, VISION 2050, or the Regional Transportation Plan, although such revisions may not be strictly required for certification. Jurisdictions are encouraged to address those items during upcoming comprehensive plan updates and other planning efforts.

Conformity with Growth Management Act Transportation Planning Requirements and Consistency with Regional Plans and Policies

OVERVIEW

This section discusses conformity with the Growth Management Act (RCW 36.70A.070(6)) and the transportation-related requirements for local comprehensive plans. It also discusses consistency with the adopted multicounty planning policies (established regional guidelines and principles under RCW 47.80.026) adopted in VISION 2050 and the Regional

¹ The certification requirement in the Growth Management Act is described in RCW 47.80. The specific requirements for transportation elements in local comprehensive plans are spelled out in RCW 36.70A.070. PSRC's Interlocal Agreement, Section VII, also provides direction for the review of local comprehensive plans and countywide policies (Resolution A-91-01, amended March 1998). The Council's Executive Board last updated its process for Policy and Plan Review in September 2003. The process is also described in [VISION 2050: Implementation](#).



Transportation Plan. In addition to the multicounty planning policies, VISION 2050 contains a regional growth strategy with a preferred distribution of the region's residential and employment growth, as well as several implementation actions for local governments to carry out. Each policy area addressed in VISION 2050 is discussed in turn below. More information about the requirement to review and certify local plans is provided in the [Adopted Policy and Plan Review Process](#).

Plans are reviewed using PSRC's [VISION 2050 Consistency Tool](#). This report documents where the plan meets requirements, highlights outstanding provisions of the plan, and identifies where additional work is needed to fully address VISION 2050, the Regional Transportation Plan, or Growth Management Act planning requirements. This section is organized by the sections in VISION 2050. While this may align with plan elements, many of these concepts may be addressed in various parts of local comprehensive plans.

Regional Collaboration

Scope of Review

The Growth Management Act (RCW 36.70A.070(6)) and VISION 2050 call for local comprehensive plans to:

- **Coordinate** with other jurisdictions, agencies, tribes, ports, military installations, and special purpose districts.
- Prioritize **access to opportunity** for people of color, people with low incomes, and historically underserved communities.
- Address opportunities and challenges related to **military installations** when applicable.
- Prioritize investments in **centers**.
- Explore **funding sources** and fiscal tools to meet infrastructure and other needs.

Certification Findings

The Sultan comprehensive plan effectively addresses regional collaboration policies in VISION 2050. The plan includes policies and discussion on coordination with Snohomish County, WSDOT, Community Transit, utility providers, and special purpose districts on transportation, annexation, public services, and other issues. It has a goal and several policies promoting equity in the development process, ensuring that growth benefits all residents and minimizes the risk of displacement to vulnerable communities.



Regional Growth Strategy

Scope of Review

VISION 2050 calls for local comprehensive plans to:

- Incorporate **housing and employment targets**.
- Use **land use assumptions** substantially consistent with countywide growth targets.
- Demonstrate sufficient zoned **development capacity** to accommodate targets.
- Use consistent **land use assumptions** throughout plan.
- Maintain a **stable urban growth area** with densities that support the Regional Growth Strategy.
- Support growth in designated **centers and high-capacity transit station areas**.
- Manage and reduce **rural growth** and protect natural resource lands.

Certification Findings

The Sultan comprehensive plan effectively addresses the Regional Growth Strategy policies in VISION 2050. The plan demonstrates that the city has sufficient capacity to accommodate its adopted growth targets of 1,425 additional housing units and 1,329 additional jobs. It includes discussion and policies to promote infill development.

Environment

Scope of Review

VISION 2050 calls for local comprehensive plans to:

- Ensure **air quality standards** are met and reduce emissions of air toxics and greenhouse gases.
- Protect **critical areas and habitat** through coordination and environmental stewardship.
- Plan for **park, trail, and open space** resources and needs.
- Protect and enhance **tree canopy and native vegetation**.
- Protect and restore **water quality**, including actions to restore shorelines and estuaries, remove fish-passage barriers, reduce toxic products, and manage stormwater.
- Ensure **access to healthy environments** for all residents, prioritizing the reduction of impacts for vulnerable residents.

Certification Findings

The Sultan comprehensive plan effectively addresses the environmental policies in VISION 2050. The plan calls for the city to act as a steward of Sultan's natural areas and ecosystems, reducing pollution while protecting wildlife, habitats, and natural features that are representative of Sultan's ecological heritage. It recognizes parks, trails, and open spaces as



vital community assets and promotes incorporating community input and equitable access for all residents.

Climate Change

Scope of Review

VISION 2050 calls for local comprehensive plans to:

- Reduce **greenhouse gas emissions** in support of state, regional, and local reductions goals.
- Protect and restore natural resources that **sequester and store carbon**.
- Address impacts to **vulnerable populations** that have been or will be impacted by climate change.
- Retrofit **existing buildings** to reduce building energy use.
- Increase **resilience** by identifying and addressing the impacts of climate change and natural hazards.
- Address **rising sea levels** by siting and planning for relocation out of the floodplain.

Certification Findings

The Sultan comprehensive plan effectively addresses the climate change policies in VISION 2050. The plan includes policies on reducing greenhouse gas emissions in the land use, transportation and natural environment elements. Plan policies promote strengthening the community's capacity to withstand and adapt to the effects of climate change through sustainable infrastructure, protection of natural features, and other climate resilience strategies.

The city should address the following comment in future updates to the plan:

- The city has made important progress on addressing climate change in the comprehensive plan. The Department of Commerce plans to release final guidance on climate planning consistent with House Bill 1181 in 2025, which will apply to the implementation progress report for jurisdictions in the Puget Sound region. The city should be aware of this upcoming deadline and monitor whether the plan's current state reflects the new requirements.



Land Use/Development Patterns

Scope of Review

VISION 2050 calls for local comprehensive plans to:

- Build **thriving urban communities** through inclusive engagement.
- Support **centers** as connections to opportunity.
- Address **healthy environment**, physical activity and well-being, and safety, while reducing disparities.
- Support **annexation and incorporation** by planning for phased growth of communities.
- Preserve **rural areas and natural resource lands**.
- Evaluate potential **residential and commercial displacement** and mitigate impacts.
- Limit **incompatible uses** adjacent to military lands, industrial centers, and tribal reservation lands.

Certification Findings

The Sultan comprehensive plan effectively addresses the land use and development patterns policies in VISION 2050. The plan envisions Sultan's downtown as a high quality, compact center that imparts a sense of place, incorporates mixed uses and choices in housing types, provides affordable housing options, and encourages walking, bicycling, and transit use. The plan includes policies supporting the orderly and efficient annexation of urban unincorporated areas.



Housing

Scope of Review

The Growth Management Act (RCW 36.70A.070) and VISION 2050 call for local comprehensive plans to:

- Provide an **inventory and analysis** of existing housing and housing needs at each income level.
- Document **sufficient land capacity** to accommodate housing for all income levels and emergency shelters.
- Identify **actions** to provide housing for all income levels.
- Identify and address **racially disparate impacts, displacement, or exclusion** in housing.
- Expand housing capacity for **moderate-density housing**.
- Promote **jobs-housing balance**.
- Support the **development and preservation of affordable housing** by considering inclusionary and incentive zoning and promoting affordable housing near high-capacity transit.
- Promote **homeownership** opportunities.

Certification Findings

The Sultan comprehensive plan effectively addresses the housing policy topics in VISION 2050. The plan demonstrates that the city has sufficient capacity to accommodate its allocated share of countywide housing need, including emergency housing, and documents strategies to address barriers to affordable housing. The plan includes a thorough racially disparate impacts analysis and policies to mitigate racially disparate impacts, displacement, and exclusion in local housing.

The city should address the following comment in future updates to the plan:

- The region is facing a housing crisis, and jurisdictions should act with urgency to address the housing needs of all residents. PSRC encourages the city to continue to work with regional partners to monitor housing conditions, to implement housing strategies, and to amend the plan periodically to adjust to changing conditions.



Economy

Scope of Review

VISION 2050 calls for local comprehensive plans to:

- Identify and enhance **industry clusters**, including those that provide goods and services for export.
- Support retention and recruitment of **family wage jobs** and small businesses that are **locally, women-, and minority-owned**.
- Develop a **range of employment opportunities** to create a closer balance between jobs and housing.
- Address and prevent potential **physical, economic, and cultural displacement** of existing businesses.
- Expand **access to opportunity** and remove barriers for disconnected communities.
- Recognize and empower the contributions of the region's **culturally and ethnically diverse communities**.

Certification Findings

The Sultan comprehensive plan effectively addresses the economy policies in VISION 2050. The plan's economic development element guides the city toward a more economically active and fiscally sustainable future and includes planning themes such as catalyzing mixed-use development and providing new job opportunities and workforce housing so people can live and work in Sultan. The plan encourages local business development opportunities for small or start-up businesses that may be owned by or employ Sultan residents, especially those from underrepresented groups.



Transportation

Scope of Review

The Growth Management Act (RCW 36.70A.070(6)) requires local comprehensive plans to:

- Use **internally consistent land use assumptions** and forecasts of travel demand and that are consistent with growth targets.
- Provide **inventories of existing facilities**, and level-of-service standards and concurrency provisions that address multiple modes of travel, planned land uses and densities, and state highways.
- Include a **multiyear financing plan** and reassessment strategy to address potential funding shortfalls.
- Direct **demand management**, including programs to implement the Commute Trip Reduction Act.
- Plan for **pedestrians and bicycles**, including capital investments, education, and safety.
- Discourage **incompatible uses adjacent to airports**.
- Address **air quality** and the reduction of pollutants consistent with WAC 173-420-080.

VISION 2050 also calls for local comprehensive plans to:

- Plan for **system maintenance, safety and emergency management**.
- Support the **Regional Growth Strategy**.
- Provide **alternatives to driving alone**.
- Plan facilities and services for **special needs transportation**.
- Avoid the creation of new and expanded facilities in **rural areas**.
- Identify **racial and social equity** as a core objective when implementing transportation projects.
- Protect the **environment** and reduce stormwater pollution.

Certification Findings

The Sultan comprehensive plan effectively addresses the transportation planning requirements of the Growth Management Act and the transportation policies in VISION 2050. The plan includes a bicycle and pedestrian component with facility inventories, policies to improve the environment for walking and biking, and projects to complete a nonmotorized network. It provides support for transitioning to a cleaner transportation system by planning for and encouraging investment in clean energy options such as zero emission vehicles, low carbon fuels, and the necessary infrastructure to support clean energy options.



The city should address the following comments in future updates to the plan:

- Please note that the Growth Management Act will require multimodal level of service standards in central Puget Sound jurisdictions by 2029, and additional guidance may be available in the future to refine adopted standards.

Public Services

Scope of Review

VISION 2050 calls for local comprehensive plans to:

- Promote **coordinated and efficient** use of public services.
- Protect **water quality** by serving urban development with sewer systems and replacing failing septic systems.
- Consider the **impacts of climate change on public facilities** and promote renewable energy.
- Promote **affordable and equitable access to public services**, especially for underserved communities.
- Promote working with school districts on **school siting and design** to support safe, walkable access.

Certification Findings

The Sultan comprehensive plan effectively addresses the public services policies in VISION 2050. The plan directs new development to connect to the city sewer system and supports a long-term strategy to convert existing development from septic systems to sanitary sewer. It includes a policy to integrate parks into the city's flood mitigation strategy, utilizing green spaces to manage stormwater, reduce flooding risks, and enhance resilience against climate impacts.

Conclusion and Next Steps

PSRC found the City of Sultan comprehensive plan is substantially consistent with the transportation-related provisions of the Growth Management Act, VISION 2050 and the Regional Transportation Plan.

PSRC encourages the city to address areas identified for additional work in upcoming plan updates and other planning efforts. These may be areas where additional work would make the plan more consistent with the Growth Management Act or VISION 2050 and areas that may be necessary to address prior to the 2029 Growth Management Act Implementation Progress Report.

PSRC is available to provide assistance with future plan updates. Find additional planning resources on [PSRC's Plan Review webpage](#). If the city has questions or needs additional information, please contact Erika Harris at 206-464-6360 and eharris@psrc.org.

