BACKGROUND
The Washington State Growth Management Act calls for coordination between local, regional, and state planning efforts. To advance this coordination, state law requires PSRC to certify that regional transit plans, countywide planning policies, and local comprehensive plans within the central Puget Sound region conform to: (1) established regional guidelines and principles, (2) the adopted long-range regional transportation plan, and (3) transportation planning requirements in the Growth Management Act. Within the central Puget Sound region, the multicounty planning policies in VISION 2040 have been established as the regional guidelines and principles under Revised Code of Washington (RCW) 47.80.026. Certification of local comprehensive plans is also a requirement for jurisdictions and agencies that intend to apply for PSRC funding or proceed with any project submitted into the Regional Transportation Improvement Program, regardless of funding source.

Within the central Puget Sound region, local governments and PSRC have worked together to develop an overall process (Adopted Policy and Plan Review Process, Revised September 2003) for reviewing and certifying local, countywide, regional, and transit agency policies and plans. This process also provides an opportunity to coordinate and share information related to local and regional planning. A set of materials, compiled in a Plan Review Manual, provides details on the review and certification process, background, and framework. The manual also provides guidance and checklists for aligning plans and policies with VISION 2040, Transportation 2040, and Growth Management Act requirements.

DISCUSSION
This report summarizes the findings and recommendations regarding the major update to the comprehensive plan for the City of Marysville, adopted by the city on September 15, 2015. PSRC last certified the Marysville comprehensive plan in 2004. Since 2004 the plan has also been updated with annual amendments. PSRC staff reviewed Marysville’s 2015 update to its comprehensive plan, and coordinated with city staff in the development of this report.

CERTIFICATION RECOMMENDATION
Based on the review of the City of Marysville comprehensive plan, the following action is recommended to the PSRC Growth Management Policy Board, Transportation Policy Board, and Executive Board:

The Puget Sound Regional Council certifies that the transportation-related provisions in the 2015 City of Marysville comprehensive plan update conform to the Growth Management Act and are consistent with multicounty planning policies and the regional transportation plan.

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 2040, Part IV: Implementation.
The remainder of this report contains a summary of the PSRC review of the City of Kent comprehensive plan update. Under each heading, the scope of the certification review, as guided by the Plan Review Manual and Local Comprehensive Plan Checklist, is listed in high level bullets. Discussion in each topic area highlights exemplary provisions of the plan, as well as issues identified through the certification review where future work on the part of the city is needed to more fully address VISION 2040, Transportation 2040, and Growth Management Act planning requirements.

**Part I: Conformity with Growth Management Act Transportation Planning Requirements**

**Scope of Review**

The Growth Management Act (RCW 36.70A.070(6)) includes several requirements related to transportation elements in local comprehensive plans. These requirements are summarized as follows:

- **Land use assumptions and forecasts of travel demand** that are internally consistent and consistent with growth targets.
- **Service and facility needs**, including 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.
- **Financing and investments**, including a multiyear financing plan and reassessment strategy to address potential funding shortfalls.
- **Intergovernmental coordination** with neighboring cities, counties, and regional and state agencies.
- **Demand management**, including programs to implement the Commute Trip Reduction Act.
- **Pedestrian and bicycle planning**, including project funding and capital investments, education, and safety.
- **Land uses adjacent to airports**, identifying relevant facilities, existing and planned uses, and policies that discourage incompatible uses.

Air quality is largely an interjurisdictional issue in which each jurisdiction’s travel behaviors, measured through vehicle emissions, affect the regional airshed. The Washington Administrative Code (WAC) requires local transportation elements and plans to include “policies and provisions that promote the reduction of criteria pollutants” for mobile sources (WAC 173-420-080). When PSRC reviews plans, it also certifies that the comprehensive plans include air quality policies and provisions, including a commitment to meeting the requirements of applicable federal and state air quality legislation.

**Discussion: Exemplary Plan Provisions**

The City of Marysville’s comprehensive plan satisfies most of the transportation planning requirements of the GMA and includes adequate air quality policies and provisions. The plan includes many provisions that go above and beyond minimum requirements, including:

- The transportation and other plan elements have many policies supportive of walking, biking and transit. The Growth Management Act requires level of service standards for all locally owned arterials and transit routes, and VISION 2040 (see MPP-DP-53 and DP-54) calls for other modes, such as biking and walking to be addressed through LOS and concurrency. Comprehensive plan policy T-45 calls for the city to consider implementing multimodal concurrency, based on best practice from throughout the region.
- RCW 36.70A.070(6)) requires that local comprehensive plans include a multiyear transportation financing plan for how the jurisdiction will meet the mobility needs identified for the planning period. The Marysville comprehensive plan addresses in detail the major elements of a financing plan, including lists of planned multimodal transportation improvements, estimated timing and cost of those
improvements, estimated revenues available to the city over the course of the planning period, and a reassessment strategy to address shortfalls in fund availability.

**DISCUSSION: AREAS FOR FURTHER WORK**

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

- The financing strategy indicates a shortfall in projected revenue of between $350 and $460 million compared to estimated costs needed to implement the transportation element. Section 5.3.2 of the transportation element describes a process for addressing this significant funding gap through the 6-year TIP process and provides a menu of options for closing the gap. The city should consider clarifying and strengthening the guidance in the comprehensive plan, such as by identifying priority investments and investments that may be contingent on securing additional funding.

**Part II: Consistency with Regional Plans and Policies**

**OVERVIEW**

This section discusses consistency with the adopted multicounty planning policies (established regional guidelines and principles under RCW 47.80.026) adopted in VISION 2040, and Transportation 2040, the region’s long-range transportation plan. In addition to the multicounty planning policies, VISION 2040 contains a regional growth strategy with a preferred distribution of the region’s residential and employment growth, as well as a number of implementation actions for local governments to carry out. VISION 2040 calls for local comprehensive plans to contain a brief statement of how the plan addresses the multicounty planning policies. Each policy area addressed in VISION 2040 is discussed in turn below.

**VISION 2040 CONTEXT STATEMENT**

VISION 2040 calls for local plans to include a context statement that describes how the comprehensive plan addresses regional policies and provisions adopted in VISION 2040. The adopted comprehensive plan for Marysville includes a detailed statement of consistency with VISION 2040 on pages 1-3 and 1-4.

**Environment**

**SCOPE OF REVIEW**

VISION 2040 calls for local comprehensive plans to address the following environmental policy topics:

- **Stewardship**, including addressing the natural environment throughout the plan, decisions based on best-available science, and regional environmental initiatives.
- **Earth and habitat**, including open space protection, restoration and protection of native vegetation, and coordination with adjacent jurisdictions.
- **Water quality**, including actions that maintain hydrologic functions and reduce water pollution in ecosystems, watersheds, shorelines, and estuaries.
- **Air quality and climate change**, addressing federal and state laws, reduction of pollutants, Puget Sound Clean Air Agency policies, and reduction of greenhouse gas emissions and adaptation to climate change.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

The city’s comprehensive plan addresses the environmental policy topics in VISION 2040 with strong goals and actionable policies in all topic areas. Highlights include:

- The plan contains an environmental element that addresses environmentally sensitive areas, water and air quality, wildlife habitat, and other environmental topics. Background and policies contained in this
element provide a sound basis for additional policies in the land use, capital facilities, and transportation elements that protect and enhance environmental quality.

☑ Policies EN-50 through EN-68 address climate change, including a comprehensive set of factors related to mitigation and adaptation, such as energy efficiency in municipal facilities and operations, adaptation to anticipated climate impacts on the local environment and infrastructure, and reductions in greenhouse gas emissions from the transportation sector, such as through reductions in vehicle miles traveled, encouragement of alternative modes of travel, and expanded transportation demand management strategies.

**DISCUSSION: AREAS FOR FURTHER WORK**
The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on the environment.

**Development Patterns – including Regional Growth Strategy**

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<tr>
<th><strong>SCOPE OF REVIEW</strong></th>
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<tr>
<td>VISION 2040 calls for local comprehensive plans to address the following development patterns policy topics:</td>
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<td><strong>Urban areas</strong>, including targets for housing and employment growth, compact communities that support transit and walking, and provisions for redevelopment of underused land.</td>
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<td><strong>Centers</strong>, including planning for one or more central places as locations for compact, mixed-use development, with policies that prioritize funding to centers to advance development.</td>
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<tr>
<td><strong>Unincorporated urban areas</strong>, including policies that advance annexation and orderly transition of governance.</td>
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<tr>
<td><strong>Resource lands</strong>, including identification of steps to limit development.</td>
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<tr>
<td><strong>Regional design</strong>, addressing local provisions that apply the Transportation 2040 Physical Design Guidelines, energy efficient building, historic preservation, and enhanced sense of community.</td>
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<tr>
<td><strong>Health and active living</strong>, addressing healthy environment, physical activity and well-being, and safety.</td>
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**DISCUSSION: EXEMPLARY PLAN PROVISIONS**
The city’s comprehensive plan addresses the development patterns policies in VISION 2040. Highlights include:

☑ Section E of the land use element, particularly tables 4-6 and 4-7, provides a comprehensive and systematic analysis of land use, housing, and economic tools in use or being considered by the city to encourage compact and efficient development within the UGA. This information supports the current UGA boundary as well as future efforts to accommodate housing and employment in the urban area.

☑ MPP-DP-11 calls for each jurisdiction to plan for one or more central places as the location for compact, mixed use development. The draft Marysville comprehensive plan is exemplary in planning for its downtown city center, with mixed and commercial uses, transportation investments, and improvements to the public realm (see LU-83 to 96 and the Downtown neighborhood plan). The plan implements a vision for additional central places as well, including an emerging area of concentrated residential and commercial activity in the Lakewood neighborhood. Policy T-14 prioritizes public investments to facilitate development and quality of life in centers.

☑ The land use element includes a clear description of the countywide framework for growth targets and quantifies local growth assumptions and development capacity consistent with that framework.

**DISCUSSION: AREAS FOR FURTHER WORK**
The city should address the following comments at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:
MPP-DP-1 calls for coordinated efforts to ensure long-term stability and sustainability of the urban growth area. VISION 2040 calls for cities to be the preferred providers of urban services to accommodate growth. MPP-DP-19 calls for coordinated planning between cities and counties to address orderly transition of governance. The Marysville comprehensive plan documents the city’s success in achieving annexation for nearly the entirety of its potential annexation areas. The plan also calls for working with Snohomish County to identify Rural Urban Transition Areas as locations for potential future growth that may be appropriate for UGA expansion. As the city continues to explore options for annexation, especially annexation of lands that are currently in the rural area, it should consider amending the plan to clarify that any UGA expansions will be consistent with multicounty and countywide planning policies, including criteria related to countywide growth needs and regional policy promoting “long-term stability and sustainability of the urban growth area consistent with the regional vision” (MPP-DP-1).

Housing

**SCOPE OF REVIEW**

VISION 2040 calls for local comprehensive plans to address the following housing policy topics:

- **Increased housing production opportunities**, including diverse types and styles for all income levels and demographic groups.
- **Affordable housing needs**, including an assessment of existing and future housing needs based on regional and local factors, including household income, demographics, special needs populations, and adequacy of existing housing stocks.
- **Regional housing objectives** in VISION 2040, including promotion of housing diversity and affordability, jobs-housing balance, housing in centers, and flexible standards and innovative techniques.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

The city’s comprehensive plan addresses the housing provisions contained in VISION 2040. The plan incorporates a number of best housing practices that address identified housing needs. Highlights include:

- The housing element contains comprehensive and detailed data analysis and documentation of current initiatives in a housing needs assessment. These data provide support for a policy commitment to building transit-connected, park-rich, and affordable communities in Marysville.
- Policy LU-25 promotes a diversity of housing types in the city, “including small lot single family, zero lot line developments, cluster housing, townhouses, duplexes, triplexes, apartments (high and low density, including garden), accessory dwelling units, and mobile home parks.”
- Policy HO-10 commits the city to work with affordable housing providers and facilitate new affordable units. HO-16 provides broad support for affordable housing preservation and production.
- The housing element includes an extensive list of implementation actions, including regulatory tools for promoting housing supply and diversity, partnerships with public and non-profit agencies, and targeted capital investments to improve neighborhood conditions for lower income households.

**DISCUSSION: AREAS FOR FURTHER WORK**

The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on housing.


**Economy**

**Scope of Review**
VISION 2040 calls for local comprehensive plans to address the following economic development policy topics:

- Include an **economic development element** that addresses: business, people, and places.
- **Retention and recruitment efforts** that support family wage jobs, industry clusters that export goods and services, and small businesses that are locally owned.
- **Equitable benefits and impacts**, including provisions and programs that promote economic vitality in distressed areas or areas with disadvantaged populations.
- **Adequate housing growth in centers** through collaboration with the private sector and provision of infrastructure.

**Discussion: Exemplary Plan Provisions**
The Marysville comprehensive plan update addresses many of the economic provisions of VISION 2040. Highlights include:

- Policies LU-163 to 178 promote and preserve industrial uses and land through strategies that include infrastructure provision, efficient use of industrial lands, impact mitigation, and setting a maximum share for non-industrial uses in designated centers.
- Policy ED-12 exemplifies the high degree of coordination promoted by the comprehensive plan around economic development opportunities in and around the proposed MIC.

**Discussion: Areas for Further Work**
The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on the economy.

**Transportation**

**Scope of Review**
VISION 2040 and Transportation 2040 call for local comprehensive plans to address the following transportation policy topics:

- **Maintenance, management, and safety**, including clean transportation with reductions in pollution and greenhouse gas emissions, environmental factors, health and safety, stable and predictable funding sources, system and demand management strategies, and security and emergency response.
- **Support for the regional growth strategy**, including system improvements that align with planned growth, prioritized investments that support compact development in centers, joint- and mixed-use development, complete streets and improvements to promote biking and walking, and context-sensitive design.
- **Improved transportation options and mobility**, including alternatives to driving alone, facilities and services for special needs transportation, avoidance of new or expanded facilities in rural areas, and financing methods.
- **Linking land use and transportation**, including integrating Transportation 2040 physical design guidelines in planning for centers and transit station areas, and land development tools that promote transportation alternatives.

**Discussion: Exemplary Plan Provisions**
The Marysville comprehensive plan addresses the major transportation emphases in VISION 2040 and Transportation 2040, including maintenance, management, and safety; support for the Regional Growth Strategy; and providing greater options and mobility. Highlights include:
The plan promotes mobility options through multimodal improvements achieved through maintenance and new construction and guided by policies, such as T-23 on complete streets, and T-25 linking non-motorized transportation to public health benefits.

Section 6.5 of the transportation element addresses sustainable transportation through promotion of context-sensitive design, transportation demand management, and adaptation to natural hazards.

Policies throughout the plan strengthen the link between land use and transportation. For example, HO-34 directs the city to work with Community Transit to ensure densities and design in transit corridors facilitate higher levels of service. T-15 prioritizes transportation investments to areas of compact pedestrian-oriented development. LU-11 promotes a mix of land uses that help to reduce reliance on the single-occupancy automobile.

Discussion: Areas for Further Work
The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on transportation (see comments addressing Growth Management Act transportation planning requirements on page 3 of this report):

Public Services

Scope of Review
VISION 2040 calls for local comprehensive plans to address the following public services policy topics:

- Promote more efficient use of existing services, such as waste management, energy, and water supply, through conservation – including demand management programs and strategies.
- Promote renewable energy and alternative energy sources.
- Plan for long-term water needs, including conservation, reclamation and reuse.

Discussion: Exemplary Plan Provisions
The city’s comprehensive plan update contains policies that address the public services provisions of VISION 2040. Highlights include:

- Policies governing public services delivery, such as PF-2 and PF-7, are well-coordinated with the plan’s land use vision and promote infill and compact development.
- Policy PF-10 fosters the maintenance and restoration of natural drainage systems.
- Policies PF-14 through 16 address efficiency and conservation, including in water consumption and solid waste disposal, related to residential, industrial, and public uses and facilities.

Discussion: Areas for Further Work
The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on public services.

Conclusion
PSRC staff thanks the city for working through the plan review and certification process. PSRC is available to provide assistance for future plan updates. Additional planning resources can also be found at http://www.psrc.org/growth/planreview/resources/. If the city has questions or needs additional information, please contact Michael Hubner at 206-971-3289 or mhubner@psrc.org.