

# City of Lake Stevens Comprehensive Plan: Audit of Existing Plan & Gap Analysis



City of Lake Stevens

SBN Planning

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## Process Overview of Gap Analysis

As part of the initial review of the existing city of Lake Stevens (City) Comprehensive Plan, the first step is to evaluate the gaps in the existing document regarding the statutory requirements of the Growth Management Act (GMA) and changes to Washington State Laws. This process begins by reviewing the existing document with a set of checklists provided by the Department of Commerce (COM), followed by a review using checklists from the Puget Sound Regional Council (PSRC). Both checklists include detailed references to the Washington Administrative Code (WAC) and the Revised Code of Washington (RCW) to clarify relationships with the legal requirements and legal basis for the planning and comprehensive plan update process. In completing the gap analysis, the goal is to create a working task list for elements of the comprehensive plan requiring update, creation, and removal. Both the COM and PSRC checklists include sections and items which do not apply to the City and have been omitted or listed as NA, as they are generalized for all jurisdictions required to plan under RCW 36.70A.040.

The plan review team understands that many of the missing elements are already identified. This review focuses on the most currently-amended comprehensive plan without considering current updates and completed work. Recent work on pieces such as a Housing Action Plan, Climate Sustainability Plan, and Lake Stevens Industrial Center Industrial and Market Analysis will inform the planning process but generally do not inform this review. The transportation planning team at Transpo Group has completed an independent study of the transportation checklists, also included here. Similarly, Berk's review of the housing element – conducted as part of their Housing Action Plan work – informs the review below.

## Department of Commerce Checklists

### Comprehensive Plan Element Reviews

The following section includes a chapter-by-chapter review of the existing Comprehensive Plan and includes the gap analysis results as conducted using the COM and PSRC checklists. Each Chapter includes the results of the checklist reviews and may include a brief summary of the review and possible next steps identified by the plan review team. The checklist may include recommendations or needed action as necessary and appropriate. Chapters or checklist elements that are not required for the City have been noted in their respective locations below.

## Land Use

The Land Use element of the current Lake Stevens 2015-2035 Comprehensive Plan is in satisfactory condition. However, there is room for improvement and consistency with the rest of the plan. The most pressing note brought up in this review is a lack of consistency in land use assumptions made throughout the plan, spanning the land use, housing, and transportation chapters most notably. While this isn't a problem with the land use element in and of itself, it will require increased attention to consistency during this update process.

Other requirements, such as trails, public access, or cluster development, are addressed in supporting subarea plans and master plans. While descriptions of the subarea plans are included, it is recommended that other prepared documents, such as the trails master plan, are also referenced to address the corresponding requirements for this element and that relevant policies be included for those aspects that have not already been executed.

The land use map provided will also need to be updated. There are significant differences between the current land use map and actual on-the-ground planning and development. A separate analysis of these discrepancies and solutions should support this update. In general, future maps should focus on not just showing required elements but also aspire to be more legible to both experts and laypeople. Many of the maps currently in the plan appear low-resolution, difficult to read, and ultimately do not support the broader purpose of the plan as a touchpoint for members of the community. Two general-use airports exist relatively near the current boundaries of the city; further investigation into thresholds of proximity may be required to ensure that relevant policies regarding appropriate development adjacencies are not needed.

Many of the pieces identified as requiring updates in the Land Use Element fall into two major categories: improving references to other plans and elements or revising outdated references. The former includes making checklist items *f*, *g*, *h*, and *k*, where the planning review team felt that finding ways to connect goals, policies, or references to other elements and plans more intuitively could strengthen these connections. Revisions to outdated material include checklist items *a*, *b*, and *d*. In both cases, updates are relatively straightforward and generally are less about updating specific goals and policies than updating figures, and tables, and providing a more intuitive visual connection between references.

Land Use Element Consistent with countywide planning policies (CWPPs) and <a href="#">RCW 36.70A.070(1)</a>			
Element:	In Current Plan?	Changes needed to meet current statute?	Notes:
New 2021-2022 legislation ESSB 5593: changes to RCW 36.70A.130 (codification pending) regarding UGA size, patterns of development, suitability and infrastructure. Coordinate these efforts with your county	No	Unclear	Make sure any changes to the capital facility and/or transportation element and associated projects address current and possible future UGA, if any changes are anticipated.
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. RCW 36.70A.210 WAC 365-196-305 Coordinate these efforts with your county	Yes <a href="#">Table 2.5</a>	Yes	Ensure that the county wide policies listed under table 2.5 are up to date, and update comments on effectiveness to ensure no new disparities or deficiencies have arisen, especially as a result of the COVID 19 pandemic.
b. A future land use map showing city limits and UGA boundaries. RCW 36.70A.070(1) and RCW 36.70A.110(6) WAC 365-196-400(2)(d), WAC 365-196-405(2)(i)(ii)	Partial <a href="#">Figure 2.3</a>	Yes	Existing map shows current uses and designations for 2021. It will require updates to reflect changes. There is also an opportunity to make this map more legible and functional in the plan itself.
c. Consideration of urban planning approaches that increase physical activity. RCW 36.70A.070(1) and WAC 365-196-405(2)(j). Additional resources: Transportation Efficient Communities, The Washington State Plan for Healthy Communities, Active Community Environment Toolkit	Yes <a href="#">Goal 2.14</a>	No	Policies adequately provide for pedestrian and non-motorized forms of travel, public transit and safety, aging in place, and safe active neighborhoods.
d. A consistent population projection throughout the plan which should be consistent with the county's sub-county allocation of that forecast and housing	Yes	Yes	Element includes projections for 2044. Other elements will need to be updated to reflect these projections. Ensure tables are up



needs. RCW 36.70A.115, RCW 43.62.035 and WAC 365-196-405(f)			to date with latest projections and data
e. Estimates of population densities and building intensities based on future land uses and housing needs. RCW 36.70A.070(1), WAC 365-196-405(2)(i) · For cities required to plan under the Buildable Lands Program, RCW 36.70A.215 amended in 2017, some jurisdictions may need to identify reasonable measures to reconcile inconsistencies. See Commerce's Buildable Lands Program page.	Yes	No*	Element includes projections for 2044 and considers densities and housing types needed to match the demographics of Lake Stevens through this planning horizon.  *TBD based on outcome of Housing Action Plan
f. <u>Provisions for protection of the quality and quantity of groundwater used for public water supplies.</u> RCW 36.70A.070(1); WAC 365-196-405(1)(c); <a href="#">WAC 365-196-485(1)(d)</a>	Partial <a href="#">Goal 2.11</a>	Yes	Link goals or policies across to relevant goals or policies in Environment & Natural Resources, and reference infiltration challenges outlined in the environmental element.
g. Identification of lands useful for public purposes such as utility corridors, transportation corridors, landfills, sewage treatment facilities, stormwater management facilities, recreation, schools, and other public uses. <a href="#">RCW 36.70A.150</a> and <a href="#">WAC 365-196-340</a>	Partial	Yes	Add references to required maps that are provided elsewhere, and ensure that they are legible. Element includes some policies to address future development includes provisions for adequate infrastructure to be implemented concurrently to eliminate retrofitting
h. Identification of open space corridors within and between urban growth areas, including lands useful for recreation, wildlife habitat, trails, and connection of critical areas. RCW 36.70A.160 and WAC 365-196-335	Partial	Yes	The land use element does not include policies related to recreation and trails. However, a comprehensive trail plan for the city is provided here: <a href="#">LS Trails Master Plan</a> . The PROS element does capture some of this information and both sources could be referenced to address this point.
i. If there is an airport within or adjacent to the city: policies, land use designations (and zoning) to discourage the siting of incompatible uses adjacent to general aviation airports. RCW 36.70A.510, RCW	No	No	The element does not include any provisions or policies related to airports. Heineck Farm Airport and Reoh1 Heliport are near but not immediately adjacent to



36.70.547 Note: The plan (and associated regulations) must be filed with the Aviation Division of WSDOT. WAC 365-196-455			current city boundaries or UGA's. If the UGA changes significantly, this may necessitate policies and provisions to address compatible uses adjacent to these <a href="#">General Aviation Airports</a>
j. Where applicable, a review of drainage, flooding, and stormwater runoff in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state. RCW 36.70A.070(1) and WAC 365-196-405(2)(e) Note: <a href="#">RCW 90.56.010(27)</a> defines waters of the state. Additional resources: <a href="#">Protect Puget Sound Watersheds</a> , <a href="#">Building Cities in the Rain</a> , <a href="#">Ecology Stormwater Manuals</a> , <a href="#">Puget Sound Partnership Action Agenda</a>	Partial	No	An analysis of drainage, flooding, and stormwater characteristics and challenges is not included in the land use element. Policies to address stormwater are included under <a href="#">Goal 2.11</a> . Chapter 4 provides a critical areas map, but only provides qualitative statements, definitions, and broad policies regarding their stewardship and protection based on BAS. Critical area considerations are more developed in the Environment and Natural Resources element and the actual CAO adopted by the City.
k. Policies to designate and protect critical areas including wetlands, fish and wildlife habitat protection areas, frequently flooded areas, critical aquifer recharge areas, and geologically hazardous areas. In developing these policies, the city must have included the best available science (BAS) 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.030(6), RCW 36.70A.172, WAC 365-190-080 Best Available Science: see WAC 365-195-900 through -925	Partial	Yes	<a href="#">Policy 2.10.5 and 2.10.6</a> address wetlands, riparian corridors, and wildlife habitats in very broad strokes and in conjunction with providing recreation. Add quantitative data or references to support goals and policies. <a href="#">Chapter 4</a> (Environment and Natural Resources) provides a critical areas map, but only provides qualitative statements, definitions, and broad policies regarding their stewardship and protection.
l. If forest or agricultural lands of long-term commercial significance are designated inside city: a program authorizing Transfer (or Purchase) of	No	No	No forest or agricultural lands of significance are designated in the city. Current code provides for TDR for properties within

Development Rights. RCW 36.70A.060(4), RCW 36.70A.170			critical areas.
m. If there is a Military Base within or adjacent to the jurisdiction employing 100 or more personnel: policies, land use designations, (and consistent zoning) to discourage the siting of incompatible uses adjacent to military bases. RCW 36.70A.530(3), WAC 365-196-475	No	No	No military base within or adjacent to the city

## Housing

The city of Lake Stevens (City) needs to provide significant updates to its 2015-2035 Comprehensive Plan Housing Element to achieve compliance with state legislations. Recent changes to RCW 36.70A.070 and the Washington Administrative Code have expanded definitions and broadened the categories of consideration for discussion and policy development. Recently-passed legislation, awaiting codification, also poses an evolving landscape of potential changes to the housing element and associated Housing Action Plan. The majority of compliance issues identified in the Housing Element are linked to or due to this shifting landscape.

The existing plan includes a comprehensive housing needs assessment and supportive policies that align with the housing goals outlined in PSRC's VISION 2050. However, it lacks the inclusion of some amended supportive housing types listed in RCW 36.70A.070(2)(c). The plan encourages progressive infill approaches to address future housing needs across various income brackets, and it prioritizes funding for transportation infrastructure and services to facilitate development in identified growth centers. Although there is some existing discussion on the relationship between housing location and employment centers, there is room for improvement in establishing a stronger connection between development location and proximity to employment centers.

Updated housing inventory and projection figures across various income levels, as mandated by RCW 36.70A.070(2)(c)(i) are necessary. Additionally, a more explicit capacity analysis that can be integrated with the Land Use Element is required. Recent amendments following the previous certification require the identification of regulations and policies that may result in racially disparate impacts and increased risk of displacement. It is necessary to develop policies and regulations that address and rectify discriminatory zoning practices, disinvestment, and issues related to infrastructure availability.

The update must include an inventory and projections of additional housing types. These include housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, and permanent supportive housing. These considerations are essential in determining the land capacity for this element. Furthermore, it is recommended by the Puget Sound Regional Council, as stated in their 2015 certification report, that the Housing Element should include a discussion of implementation strategies, along with timelines for the adoption, implementation, and assessment of relevant policies and provisions.

As part of the update process, Berk Consulting developed a Housing Action Plan for the City. This plan considers many of the topics in the COM checklist and provides recommendations and analysis that will form the update team's foundation for potential revisions and amendments to the Comprehensive Plan. The HAP closely addresses many of the guidelines presented by COM and included a distinct public participation process that will support a robust approach to further outreach and targeting a development of possible solutions to work towards Snohomish County's population and housing targets in Lake Stevens.

<b>Housing Element</b> <b>In the 2021 legislative session, HB 1220 substantially amended the housing-related provisions of the Growth Management Act (GMA), RCW 36.70A.070 (2). Local governments should review local comprehensive plan policies and countywide planning policies to be consistent with the updated requirements. Please refer to The Washington State Department of Commerce's housing webpages for further information about the new requirements:</b> <b>Updating GMA Housing Elements and Planning for Housing</b>			
<b>Element:</b>	<b>In Current Plan?</b> Yes/No If yes, cite section	<b>Changes needed to meet current statute?</b> Yes/No	<b>Notes:</b>  <a href="#">WAC - Housing Requirements</a>
a. 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)	Yes. Chapter 3 of the Comprehensive Plan includes goals regarding housing preservation, improvement, and development. Policy 3.14 in the Comprehensive Plan	No	Note Goal 3.6 (page H-20) and associated policies in particular for housing preservation and improvement, especially related to community revitalization and maintenance of existing affordable housing. While changes to these goals, policies, and objectives will occur as part of this update, this is currently in compliance with these statutory/regulatory requirements.

	specifically promotes moderate density housing options.		
b. Within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes. RCW 36.70A.070(2)(c) amended in 2021, <a href="#">WAC 365-196-300</a>	<a href="#">Yes. Policy 3.14 in the Comprehensive Plan specifically promotes small multifamily housing, and duplexes, triplexes, and townhomes are included in LSMC Table 14.40-I.</a>	No	Note that revisions to the code may be required under new provisions from HB 1110 to include more middle housing options and expand the provision of townhomes. See E2SHB 1110.PL Sec. 3(5).
c. Consideration of housing locations in relation to employment locations and the role of ADUs. RCW 36.70A.070(2)(d) amended in 2021	<a href="#">Yes. Policy 3.1.1 and 3.1.4 encourage housing that is “equitably and rationally” distributed, and Policies 2.14.1 and 3.5.1 consider higher densities, mixes of land uses, and pedestrian access to employment</a>	No	Given the auto-oriented nature of the community and low jobs-to-residents ratio, considering locations of housing versus employment may be more challenging than in other communities. However, this may be strengthened with additional policies regarding a focus on transit-supported residential development.

	<a href="#">to address distances between home and work locations.</a> <a href="#">Policy 3.1.6 allows for ADUs in all residential zones with certain considerations of neighborhood quality.</a>		
<p>d. An inventory and analysis of existing and projected housing needs over the planning period, by income band, consistent with the jurisdiction's share of housing need, as provided by Commerce. RCW 36.70A.070(2)(a) amended in 2021, WAC 365-196-410(2)(b) and (c)</p>	<a href="#">Yes.</a> <a href="#">Housing needs for extremely low-, very low-, and low-income households are provided in Table 3.5.</a> <a href="#">Goal 3.1 specifically indicates the need to provide housing at all income levels, and Goal 3.2 provides for special needs and affordable housing.</a>	Yes	<p>This section needs to be updated to consider the specific targets determined by Snohomish County Tomorrow to consider updates to general targets, targets by income band, and needs for emergency and permanent supportive housing.</p>

e. Identification of capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing. RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-410(e) and (f)	Yes. Buildable lands estimates are included in the Comprehensive Plan in Chapter 2 (Land Use), which includes a summary of residential land capacity available to reach these targets.	Yes	<a href="#">RCW 36.70A.070(2)(c) requires the housing element to find capacity to meet housing needs at every economic level. Mapped capacity and location information/recommendations including housing for expanded income brackets, government-assisted housing, emergency housing, support housing, and transitional housing is to be added to the housing element</a>
f. Adequate provisions for existing and projected housing needs for all economic segments of the community. RCW 36.70A.070(2)(d) amended in 2021, WAC 365-196-010(g)(ii), WAC 365-196-300(f), WAC 365-196-410 and see Commerce's Housing Action Plan (HAP) guidance: Guidance for Developing a Housing Action Plan	Yes. Housing needs across the communities are provided in Table 3.4 of the Comprehensive Plan, while needs for extremely low-, very low-, and low-income households are provided in Table 3.5. Goal 3.1 specifically indicates the need to provide housing at	Yes	The current Comprehensive Plan needs to be updated to consider housing targets by income band / type established by Snohomish County Tomorrow in projected housing needs. Additionally, specific considerations of special needs housing, including emergency and permanent transitional housing options, need to be included in the Comprehensive Plan.



	all income levels, and Goal 3.2 provides for special needs and affordable housing.		
<p>g. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:</p> <ul style="list-style-type: none"> <li>· Zoning that may have a discriminatory effect;</li> <li>· Disinvestment; and</li> <li>· Infrastructure availability</li> </ul> <p><a href="#">RCW 36.70A.070(e)</a> new in 2021</p>	No	Yes	<p><a href="#">RCW 36.70.070(e)</a> requires the city to evaluate how zoning may have a discriminatory impact on the community, investment areas, and infrastructure availability.</p> <p><a href="#">A new section regarding racially disparate impacts and anti-displacement policies needs to be included in the Comprehensive Plan. Note elements included in the Housing Action Plan that discussion racially disparate impacts and exclusion.</a></p> <p><a href="#">Commerce has provided guidance to aid planners on evaluating historic racially disparate impacts to communities.</a></p>
<p>h. Establish policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions.</p> <p><a href="#">RCW 36.70A.070(2)(f)</a> new in 2021</p>	No	Yes	<p>A new section regarding racially disparate impacts and anti-displacement policies needs to be included in the Comprehensive Plan.</p>
<p>i. Identification of areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments.<sup>1</sup></p> <p><a href="#">RCW 36.70A.070(2)(g)</a> new in 2021</p> <p>Establish anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as</p>	No	Yes	<p>A new section regarding racially disparate impacts and anti-displacement policies needs to be included in the Comprehensive Plan. Note elements included in the Housing Action Plan that discussion racially disparate impacts and exclusion.</p> <p>A new section regarding racially disparate impacts and</p>

investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing. RCW 36.70A.070(2)(h) new in 2021			anti-displacement policies needs to be included in the Comprehensive Plan.
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## Capital Facilities Plan

The Capital Improvements Element of the current Lake Stevens 2015-2035 Comprehensive Plan is in fair condition but will require updates to projections and plans for the target year of 2044. It is recommended that greater specificity and data be provided to support goals and policies or better reference where this data exists in other elements or planning documents. Many of the requirements for this element may already be provided in each Subarea's Capital Facilities Plan, which itself will need to be updated and referenced.

This element provides a current table of capital facility needs and cost projections as an appendix. However, the body of the element seems to still be based on or reference long-term projections for 2023-2028. Additionally, it is recommended that the 6-year plan be updated with greater specificity to align with PSRC recommendations and ensure that the correct tables or figures are being referenced. The currently referenced table provides city resources as of 2014.

The element provided an extensive list of strategies and funding sources, though they read much more as simply definitions with no indication of their feasibility or implementation. Greater specificity for the approved use of impact fees is also recommended.

### Capital Facilities Plan (CFP) Element

To serve as a check on the practicality of achieving other elements of the plan, covering all capital facilities planned, provided, and paid for by public entities including local government and special districts, etc. including 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 CFP Element. The CFP Element must be consistent with CWPPs, and RCW 36.70A.070(3), and include:

Element:	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes:

a. Policies or procedures to ensure capital budget decisions are in conformity with the comprehensive plan. <a href="#">RCW 36.70A.120</a>	Yes	No	
b. An inventory of existing capital facilities owned by public entities. RCW 36.70A.070(3)(a) and WAC 365-196-415(1)(a)	Yes	Yes	Detailed information regarding capital facilities project is provided in the Lake Stevens <a href="#">SUBAREAS CAPITAL FACILITIES PLAN</a> , but will need to be updated for target year. Required aspect provided in other elements should be referenced here for greater clarity.
c. A forecast of needed capital facilities. RCW 36.70A.070(3)(b) and WAC 365-196-415(1)(b) Note: The forecast of future need should be based on projected population and adopted levels of service (LOS) over the planning period.	Yes <a href="#">CF-32</a>	No	Table 9.1 (end of document) provides needed projects between 2023-2044
d. Proposed locations and capacities of expanded or new capital facilities. RCW 36.70A.070(3)(c) and WAC 365-196-415 (1)(c) and (3)(c) 2	Yes	Yes	Detailed information regarding capital facilities project is provided in the Lake Stevens <a href="#">SUBAREAS CAPITAL FACILITIES PLAN</a> , but will need to be updated for target year
e. A six-year plan (at least) that will finance such capital facilities within projected funding capacities and identify sources of public money to finance planned capital facilities. RCW 36.70A.070(3)(d), RCW 36.70A.120, WAC 365-196-415(1)(d)	No	Yes	Add note that projections are updated annually. Description of 6-year plan lacks specificity and references table 9.2 (CF-24) which displays sources of existing city resources from 2014 and not the 6-year projections.
f. A policy or procedure to reassess the Land Use Element if probable funding falls short of meeting existing needs. RCW 36.70A.070(3)(e) WAC 365-196-415(2)(d) Note: park and recreation facilities shall be included in the capital facilities plan element	Partial	Yes	Current plan provides a list of strategies and funding sources, but does not detail the feasibility nor implementation of said strategies and sources.

g. If impact fees are collected: identification of public facilities on which money is to be spent. RCW 82.02.050(5) and WAC 365-196-850(3)	Partial <a href="#">CF-13</a>	Yes	Element includes a brief statement on what type of projects impact fees may be used for, recommend expanding with more detail.
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## Utilities

The Public Services and Utilities Element within the City of Lake Stevens' 2015-2035 Comprehensive Plan complies with state requirements. However, it requires some revisions and expansions in its language to align with state requirements and Multicounty Planning Policies (MPPs) of the Puget Sound Regional Council and the Snohomish Countywide Planning Policies.

The plan demonstrates effective coordination with Snohomish County and relevant entities. Previous versions of the plan have not provided direct tribal coordination across various areas. This element would benefit from enhanced policy and discussion on climate change impacts and the integration of climate sustainability goals and policies, including methods and investment from the city or partnership opportunities with other agencies. Additionally, language addressing affordability, access to services for underserved communities, and the development of public safety programs is necessary. Continued coordination with Lake Stevens and Snohomish School Districts should be emphasized with the development and adoption of their capital plans regarding site selection, safety, and walkability. The element should also clarify its connection to other elements of the plan when addressing the strategic placement of community facilities, services, and civic spaces near transit, considering economic, social, and health factors to align with MPPs.

Lake Stevens requires special purpose districts to plan for system upgrades and adopts them by reference. The plan needs an updated context, map data, and growth projections for existing utilities and services.

## Utilities Element

Consistent with relevant CWPPs and RCW 36.70A.070(4). Utilities include, but are not limited to: sanitary sewer systems, water lines, fire suppression, electrical lines, telecommunication lines, and natural gas lines.

Element:	In Current Plan?	Changes needed to meet current statute?	Notes:
The general location, proposed location and capacity of all existing and proposed utilities. RCW 36.70A.070(4) and WAC 365-196-420	<a href="#">Partial</a> PS-5 - PS-17	No	Special purpose districts are required to plan for system upgrades which the city adopts by reference.



## Transportation

Based on Transpo's review, the transportation element needs revisions, as many current provisions are only in partial compliance with COM guidelines. Transpo's review also identified elements which are already compliant, but could be improved.

Element:	In Current Plan?	Changes needed to meet current statute?	Notes:
a. An inventory of air, water, and ground transportation facilities and services, including transit alignments, state-owned transportation facilities, and general aviation airports. RCW 36.70A.070(6)(a)(iii)(A) and WAC 365-196-430(2)(c).	Partial, 8.1.1 & 8.2.1	Yes	Combine and amend 8.1.1 & 8.2.1, update inventory to make it more current & complete desktop and field reviews of multimodal system
b. Adopted levels of service (LOS) standards for all arterials, transit routes and highways. RCW 36.70A.070(6)(a)(iii)(B) and (C), WAC 365-196-430	Yes	No, but can be clearer	Recommend separate LOS policy for subareas, State HSS and HRS, Community Transit, and Ped-Bike Standard
c. <u>Identification of specific actions to bring locally-owned transportation facilities and services to established LOS. <a href="#">RCW 36.70A.070(6)(a)(iii)(D)</a>, WAC 365-196-430</u>	Partial, 8.4.1	Yes	Retain 8.4.1, but amend to include the
d. A forecast of traffic for at least 10 years including land use assumptions used in estimating travel. RCW 36.70A.070(6)(a)(i), RCW 36.70A.070 (6)(a)(iii)(E), WAC 365-196-430(2)(f)	Yes	Yes	There is a forecast of a PM peak travel model. But it needs to be updated. The associated map could be easier to read as well.
e. A projection of state and local system needs to meet current and future demand. RCW 36.70A.070(6)(a)(iii)(F) and WAC 365-196-430(1)(c)(vi)	Partial	Yes	Existing LOS and demand is well covered and figure 8.3 displays projections according to the text but it is almost completely illegible in its current format and needs updating.

f. A pedestrian and bicycle component to include collaborative efforts to identify and designate planned improvements for pedestrian and bicycle facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles. RCW 36.70A.070(6)(a)(vii), WAC 365-196-430(2)(j)	Yes; 8.7.8	No	
g. A description of any existing and planned transportation demand management (TDM) strategies, such as HOV lanes or subsidy programs, parking policies, etc. RCW 36.70A.070(6)(a)(vi) and WAC 365-196-430(2)(i)(i)	Yes; 8.17.3	No	
h. An analysis of future funding capability to judge needs against probable funding resources. RCW 36.70A.070(6)(a)(iv)(A), WAC 365.196-430(2)(k)(iv)	Partial; CFP Chapter	Yes	
i. A multi-year financing plan based on needs identified in the comprehensive plan, the appropriate parts of which serve as the basis for the 6-year street, road or transit program. RCW 36.70A.070(6)(a)(iv)(B) and <a href="#">RCW 35.77.010</a> , WAC 365-196-430(2)(k)(ii)	Partial; 8.5 and TIP	Yes	In conjunction with PSRC recommendations, adopt a goal which explicitly lays out the requirements: multi-year finance plan balancing transportation improvement needs, costs, and revenues to update TIF program and adoption of TIP
j. If probable funding falls short of meeting identified needs: a discussion of how additional funds 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)(iii)	Partial; 8.5	Yes	Goal 8.5 should be significantly amended to strengthen compliance by ensuring any development which impacts LOS be mitigated, require improvements to restore LOS, adjust land use element growth capacity, or change adopted LOS to allow development
k. A description of intergovernmental coordination efforts, including an assessment of the impacts of the transportation	Yes, 8.14.1 thorough 8.14.5	No	

<p>plan and land use assumptions on the transportation systems of adjacent jurisdictions and how it is consistent with the regional transportation plan. RCW 36.70A.070(6) (a)(v); WAC 365-196-430(1)(e) and 430(2)(a)(iii)</p>			
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## Shoreline

Shoreline provision in the Comprehensive Plan and Shoreline Master Program (SMP) meet the current checklist needs from COM. The SMP is addressed thoroughly in the Environment and Natural Resources Element and reads as a cohesive extension and implementation of the goals and policies laid out by the Comprehensive Plan.

<b>Shoreline</b> <b>For shorelines of the state, the goals and policies of the shoreline management act as set forth in RCW 90.58.020 are added as one of the goals of the Growth Management Act (GMA) as set forth in RCW 36.70A.480. The goals and policies of a shoreline master program for a county or city approved under chapter 90.58 RCW shall be considered an element of the county or city's comprehensive plan.</b>			
<b>Element:</b>	<b>In Current Plan? Yes/No If yes, cite section</b>	<b>Changes needed to meet current statute? Yes/No</b>	<b>Notes:</b>
a. The policies, goals, and provisions of chapter 90.58 RCW and applicable guidelines shall be the sole basis for determining compliance of a shoreline master program with this chapter except as the shoreline master program is required to comply with the internal consistency provisions of RCW 36.70A.070, 36.70A.040(4), 35.63.125, 35A.63.105, 36.70A.480	Yes; throughout SMP	No	The SMA (RCW 90.58) is cited with every chapter as relevant and as a basis for plan compliance. Internal consistency is in line with noted RCWs, as well.
<u>b. Shoreline master programs shall provide a level of protection to critical areas located within shorelines of the state that assures no net loss of shoreline ecological functions necessary to sustain shoreline natural resources as defined by department of ecology guidelines adopted pursuant to <a href="#">RCW 90.58.060</a>.</u>	Yes; SMP Introduction	No	SMP Intro mentions no net loss of shoreline ecological function by referencing supporting documentation in the No Net Loss Report and Cumulative Impacts Analysis.

c. Shorelines of the state shall not be considered critical areas under this chapter except to the extent that specific areas located within shorelines of the state qualify for critical area designation based on the definition of critical areas provided by *RCW 36.70A.030(5) and have been designated as such by a local government pursuant to <a href="#">RCW 36.70A.060(2)</a> .	Yes; detailed under SMP Appendix B	No	Appendix B of the SMP details Critical Areas Regulations and Definitions and only considers shorelines of the state which are critical areas for reasons set out in RCW 36.70A
d. If a local jurisdiction's master program does not include land necessary for buffers for critical areas that occur within shorelines of the state, as authorized by <a href="#">RCW 90.58.030(2)(f)</a> , then the local jurisdiction shall continue to regulate those critical areas and their required buffers pursuant to RCW 36.70A.060(2).	Yes; buffers first mentioned in SMP Intro section D, more throughout	No	One of the first mention of buffers concerning critical areas is accompanied by the citation of RCW 90.48.030(2)(d) citing RCW 36.70A, and all mentions of buffers in the LSMC and SMP are consistent with the chapter.

## Siting Essential Public Facilities

Provisions in the Comprehensive Plan for siting essential public facilities are adequate and clearly presented. The plan review team had no major suggestions or causes for concern.

<b>Provisions for siting essential public facilities (EPFs)</b> <b>Consistent with CWPPs and RCW 36.70A.200 amended 2021. 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.</b>			
<b>Element:</b>	<b>In Current Plan? Yes/No If yes, cite section</b>	<b>Changes needed to meet current statute? Yes/No</b>	<b>Notes:</b>
<p>a. A process or criteria for identifying and siting essential public facilities (EPFs). RCW 36.70A.200 and WAC 365-196-550(1)</p> <p>Notes: RCW 36.70A.200 amended 2021 regarding reentry and rehabilitation facilities. EPFs are defined in RCW 36.70A.200. Regional transit authority facilities are included in the list of essential public facilities.</p>	<p><a href="#">Yes</a></p> <p><a href="#">PS-18</a></p> <p><a href="#">PS-25</a></p>	<p>No</p>	<p>RCW 36.70A.200 broadly requires that cities have a process to identify appropriate areas for publicly owned essential facilities.</p> <p>The RCW defines “essential public facilities” or EPFs as: “...airports, state education facilities and state or regional transportation facilities as defined in <a href="#">RCW 47.06.140</a>, regional transit authority facilities as defined in RCW 81.112.020, state and local correctional facilities, solid waste handling facilities, and inpatient facilities including substance abuse facilities, mental health facilities, group homes, community facilities as defined in <a href="#">RCW 72.05.020</a>, and secure community transition facilities as defined in <a href="#">RCW 71.09.020</a>”.</p> <p>As of 2021, public rehabilitation facilities were added to the definition.</p>

<p>b. Policies or procedures that ensure the comprehensive plan does not preclude the siting of EPFs. RCW 36.70A.200(5)</p> <p>Note: If the EPF siting process is in the CWPPs, this policy may be contained in the comprehensive plan as well. WAC 365-196-550(3)</p>	<p><a href="#">Yes</a></p> <p>PS-25</p> <p>Policy 7.11.1</p>	<p>No</p>	
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## Tribal Participation

In accordance with RCW 36.70A.040, federally recognized Indian tribes with ceded lands within their boundaries in their planning efforts can request to collaborate in the planning process. Should a qualifying legal tribe contact the city stating desire to participate and collaborate in the planning process, such notice would begin proceedings on establishing a mutually agreeable memorandum of understanding which outlines how the City and tribe would collaborate. At this moment this has not been triggered by a local tribe.

<b>Tribal Participation in Planning new in 2022 (codification pending – see <a href="#">HB 1717</a>)</b> <b><u>A federally recognized Indian tribe may voluntarily choose to participate in the local and regional planning processes.</u></b>			
<b>Element:</b>	<b>In Current Plan? Yes/No If yes, cite section</b>	<b>Changes needed to meet current statute? Yes/No</b>	<b>Notes:</b>
a. Mutually agreeable memorandum of agreement between local governments and tribes in regard to collaboration and participation in the planning process unless otherwise agreed at the end of a mediation period. RCW 36.70A.040(8)(a) new in 2022	No	No	As long as there is no MOU, the City is not required to collaborate in the ways outlined by this checklist. If a tribe reaches out, we will conduct the requisite measures to collaborate with tribes in the Comprehensive Planning space.
b. <u>Port elements, if adopted, are developed collaboratively between the city, the applicable port and the applicable tribe(s), which shall comply with <a href="#">RCW 36.70A.040(8)</a>.</u> RCW 36.70A.085 amended in 2022	No	No	
c. <u>Urban Growth Areas: counties and cities coordinate planning efforts for any areas planned for urban growth with applicable tribe(s).</u> <a href="#">RCW 36.70A.110(1)</a> amended 2022. RCW 36.70A.040(8)	No	No	



## Future Required Elements

### Economic Development

The economic development element of the current Lake Stevens Comprehensive Plan is in satisfactory condition but requires updates to align with the required and recommended elements outlined in WAC 365-196-435. The plan effectively summarizes local economic conditions, including population, employment rates, and various sectors, while also highlighting the strengths and weaknesses of the local economy. It would be beneficial to include additional data on current conditions such as local labor income, business sectors, and projected market performance to enhance analysis alongside discussion in the Housing Element.

Lake Stevens has made progress in developing local economic plans, including an economic strategy in 2010, an economic assessment in 2011, and the formulation of three subarea plans and a standalone analysis of its industrial area with the aim of shaping long-term economic growth. While the plan includes several broad policies intended to foster economic growth and address future needs, it is recommended to include additional programs and projects, some of which are already underway and have been analyzed in ongoing subarea plans.

The report does not include public engagement in the discussion and analysis of the economic development element. Extensive public engagement work and visioning exercises have been undertaken in the city's existing subarea plans. This data should be referenced and incorporated for analysis in the public engagement programming for the comprehensive plan update. Additionally, incorporating specific, quantified, and time-framed performance targets within the plan is proposed for measuring progress and ensuring the successful execution of economic development elements. These targets can also serve as a reference point throughout the development process.

### Parks and Recreation

The parks and recreation element of the current Lake Stevens Comprehensive Plan complies with RCOM and was updated as part of a 2019 review of the Parks system and associated planning. The City adopts the Comprehensive Plan Parks and Recreation element as a de-facto Parks, Recreation, and Open Space Plan, and the most recent update maintains the City's eligibility for grants from Washington's Recreation and Conservation Office (RCO).

The report effectively engaged the public with a distinct parks and recreation survey and highlights specific capital improvements intended to further the success and improve

levels of service for the City's parks system. Some recommended changes include updates to maps and graphics.

<b>Future required elements: pending state funding</b> <b>As of 2022, these elements have not received state funding to aid local jurisdictions in implementation. Therefore, these elements are not required to be added to comprehensive plans at this time. Commerce encourages jurisdictions to begin planning for these elements, pending the future mandate.</b>			
<b>Element:</b>	<b>In Current Plan? Yes/No If yes, cite section</b>	<b>Changes needed to meet current statute? Yes/No</b>	<b>Notes:</b>
<u>Economic Development</u> <u>Although included in RCW 36.70A.070 "mandatory elements" an 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) amended 2017</u>	<u>Yes</u>	Partial	<p>As per <a href="#">WAC 365-196-435</a> summaries of proposed programs and projects designed to foster economic growth will need to be included.</p> <p>A timeline with performance targets should be developed to establish an economic reference point and evaluate the effectiveness and progress of specified goals and programs</p>

<p>Parks and Recreation</p> <p>Although included in RCW 36.70A.070 “mandatory elements” 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)</p>	Yes	No	<p>The parks element of the comprehensive plan is adopted as a function PROS plan in the City of Lake Stevens. It includes a detailed level of service analysis, future needs analysis, public participation, and capital projects plan. The current state of the parks chapter maintains COLS' eligibility for RCO grants.</p>
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## Optional Elements

While there is not an explicit climate change element, the Environment & Natural Resources element of the current Lake Stevens 2015-2035 Comprehensive Plan Provides aspirations and includes policies that meet or exceed stated requirements, and even include optional elements such as addressing climate change.

Some updates may be needed to meet the vision of the PSRC, which is referenced within this element. The specificity of innovative approaches and how disparity or inequality is addressed are not included but will be discussed with PSRC's plan review time as needed. Statements about balancing environmental stewardship and economic viability, while ostensibly reasonable, may allow for too much leniency in actually adopting or implementing change down the road, however. While the City lacks natural resource-based uses, the best available science document was prepared and relevant data appears to support the existing Plan.

Given a complete Climate Sustainability Plan, the 2024 GMA Update process will better incorporate climate change mitigation and resilience guidance from COM and PSRC. While it will not be a requirement until the following cycle in Lake Stevens, the incorporation of recommendations, goals, and policies from the CSP will allow the plan update team to develop a foundation for future climate-focused planning to build from in the following cycle. Many of the results from the CSP will likely fold into the existing Environment & Natural Resources chapter, while others will be incorporated across the plan to ensure that climate change is a topic considered across the plan and its goals – such as previously identified opportunities to do so in the Public Services and Utilities Element.

### Optional Elements

Pursuant to RCW 36.70A.080, a comprehensive plan may include additional elements, items, or studies dealing with other subjects relating to the physical development within its jurisdiction, including, but not limited to:

Element:	In Current Plan?	Notes:
<a href="#">Climate Change Mitigation &amp; Resilience</a> <a href="#">As of 2022, this optional element has not yet received state funding to aid local jurisdictions in implementation. Please visit Commerce's Climate Program page for resources and assistance if interested in developing climate mitigation and resilience plans for your jurisdiction.</a>	Yes  <a href="#">Goal 4.8</a>	City is not anticipating a Climate Change element this cycle, and any recommendations will likely fall under the Environment & Natural Resources chapter and any other related elements.

## Consistency

During this update cycle, the Comprehensive Plan can improve presentations and implementations of inter-plan consistency. Implementation of consistency is key in ensuring a cohesive land use and transportation connection. Consistent and clear communication between consultants and the City should address these issues. The second concern is more of a function of the City's commitment to using the comprehensive plan as a "living document": there are sections that are more up-to-date than others. While the annual update process keeps elements of the plan current, functional, and reactive to the community's needs, the plan update team intends to take this major update cycle as an opportunity to establish stronger links between elements and, in turn, stronger internal consistency. By calling out cross-element pieces, the plan update team hopes that annual updates will be better equipped to keep a highly consistent Plan up-to-date.

Consistency is required by the GMA			
Element:	In Current Plan?	Changes needed to meet current statute?	Notes:
a. All plan elements must be consistent with relevant county-wide planning policies (CWPPs) and, where applicable, multi-county planning policies (MPPs), and the GMA. RCW 36.70A.100 and 210, WAC 365-196-305; 400(2)(c); 510 and 520	Partial	Yes	Plan has been subject to annual updates and some chapters are more up-to-date than others. Whole plan needs updates to match most recent CWPP and MPPs.
b. All plan elements must be consistent with each other. RCW 36.70A.070 (preamble) and WAC 365-197-040	No	Yes	There are some inconsistencies among assumptions between land use, housing, and transportation elements. The annual update process has resulted in some continuity issues, which should be rectified in this major update process.
c. The plan must be coordinated with the plans of adjacent jurisdictions. RCW 36.70A.100 and <a href="#">WAC 365-196-520</a>	No	Yes	The plan has to be circulated to nearby jurisdictions during this update cycle.



## Public Participation

The most recent major update of the plan offered relatively robust public engagement opportunities to residents. Two major open houses, an opinion survey, digital outreach, and a public meeting with City Council and the Planning Commission as well as “pop-up” events provided different venues for public participation. The result is a plan which offers a community-supported perspective in many elements. These have been supplemented with topic-specific outreach for subarea plans and park plan updates. However, as a baseline, the existing plan takes the community’s concerns, questions, and visions into account.

The only partially-missing piece in the COM checklist was a note about monitoring implementation. While some elements, such as Economic Development, mentioned the monitoring of policies set out in the comprehensive plan, each element could provide clearer metrics or guidance to measure progress in each respective field. The public participation team hopes to monitor changes by asking a few questions identical to those in the 2015 update survey, but this won’t directly correlate to some of the details in each element.

Public Participation			
Element:	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes:
a. Plan ensures public participation in the comprehensive planning process. RCW 36.70A.020(11), .035, and .140, WAC 365-196-600(3) provide possible public participation choices.	Yes; Chapter 1 I-10 outlines participation well	No	Public participation team will ensure robust participation continues in Lake Stevens. A public participation report could be a useful amendment to the plan.
b. 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 <a href="#">RCW</a>	Yes; Chapter 1 p. I-14 through I-20 outlines the process thoroughly	No	Lake Stevens uses an annual comp plan docket to keep the plan up to date with regional and local considerations from agencies and residents. The whole process and approach are outlined well in the

<p><a href="#">36.70A.130(2)</a>, <a href="#">WAC 365-196-640</a></p> <p>The plan sets out a procedure for adopting emergency amendments and defines emergency. RCW 36.70A.130(2)(b) and <a href="#">RCW 36.70A.390</a>, <a href="#">WAC 365-196-650(4)</a></p>			introductory chapter.
<p>c. Plan or program for monitoring how well comprehensive plan policies, development regulations, and other implementation techniques are achieving the comp plan's goals and the goals of the GMA. <a href="#">WAC 365-196-660</a> discusses a potential review of growth management implementation on a systematic basis.</p> <p>New 2021-2022 legislation <a href="#">HB 1241</a> provides that those jurisdictions with a periodic update due in 2024 have until December 31, 2024 to submit. The legislation also changed the update cycle to every ten years after the 2024-2027 cycle. Jurisdictions that meet the new criteria described in RCW 36.70A.130(9) (codification pending) will be required to submit an implementation progress report five years after the review and revision of their comprehensive plan.</p>	Partial	Yes	There is a slight mention of implementation monitoring in some elements, but the plan review team felt this could be touched on more throughout the plan and start in the introduction. Some elements related to land use and housing will likely continue to be tracked effectively by the City, but could be explicitly laid out as something the City will revisit and update every number of years as part of the annual update process to make such monitoring regular, predictable, and transparent.
<p><u>d. Considerations for preserving property rights. Local governments must evaluate proposed regulatory or administrative actions to assure that such actions do not result in an unconstitutional taking of private property. RCW 36.70A.370. For further guidance see the <a href="#">2018 Advisory Memo on the Unconstitutional Taking of Private Property</a></u></p>	Yes; Ch. 1 p. I-3 "State Context"	No	The state context piece in the introduction is echoed throughout the plan, as relevant to each element, and includes considerations for preserving property rights.



# Development Regulations

## Zoning Code

Zoning Code			
Element:	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes:
a. Permanent supportive housing or transitional housing must be allowed where residences and hotels are allowed. RCW 36.70A.390 New in 2021, (HB 1220 sections 3-5) "permanent supportive housing" is defined in RCW 36.70A.030; "transitional housing" is defined in RCW 84.36.043(2)(c)	No. Permanent supportive housing and transitional housing as defined under statute may be managed under LSMC 14.08.010 as Level I to III Health and Social Service Facilities. These designations are not permitted in all areas where residences are allowed, as per LSMC Table 14.40-I.	Yes	Note that requirements for mixed-use development/apartments above permitted nonresidential uses in the LB, CBD, CD, LI, and GI zones under LSMC Table 14.40-I may be applied to these housing types as well.
b. Indoor emergency shelters and indoor emergency housing shall be allowed in any zones in which hotels are allowed, except in cities that have adopted an ordinance authorizing indoor emergency shelters and indoor emergency housing in a majority of	Yes. Provisions for Level III Health and Social Service Facilities include	No	Note that definitions under LSMC 14.08.010 should be adjusted to use the nomenclature provided in state statute to avoid confusion.

<p>zones within one-mile of transit. Indoor emergency housing must be allowed in areas with hotels. RCW 35A.21.430 amended in 2021, RCW 35.21.683, amended in 2021, (HB 1220 sections 3-5)</p> <p>"emergency housing" is defined in RCW 84.36.043(2)(b)</p>	<p>emergency shelter under this definition. These uses are allowed in all zones where hotels and motels are allowed. See LSMC Table 14.40-II for more information.</p>		
<p><u>c. The number of unrelated persons that occupy a household or dwelling unit except as provided in state law, for short term rentals, or occupant load per square foot shall not be regulated or limited by cities. (HB 5235). RCW 35.21.682 new in 2021, RCW 35A.21.314 new in 2021 RCW 36.01.227 new in 2021</u></p>	<p>No. There are no clear considerations in the Code regarding unrelated persons.</p>	No	<p>Note that this only applies in cases where long-term leases (at least month-to-month) are in place. Short-term rentals and hotels/motels can still be regulated accordingly.</p>
<p>d. Limitations on the amount of parking local governments can require for low-income, senior, disabled and market-rate housing units located near high-quality transit service. RCW 36.70A.620 amended in 2020 and RCW 36.70A.600 amended in 2019</p>	<p>Yes. With respect to the requirements under (1) through (3), the city is not currently served by transit routes with sufficient frequency to be considered "high-quality" and subject to these requirements</p>	No	<p>Note that future changes in transit service could justify changes to the parking requirements, but this is not likely in the short term.</p>
<p>e. Family day care providers are allowed in all residential dwellings located in areas zoned for residential or commercial RCW 36.70A.450. Review RCW 43.216.010 for definition of family day care provider and WAC 365-196-865 for more information.</p>	<p>No. Provisions for in-home family day care uses are managed under home occupations</p>	Yes	<p>As per WAC 365-196-865(1), note that these uses may be regulated as conditional in the Code. While this cannot preclude the accommodation of these uses as per RCW 36.70A.450(4), they can provide for conditions to manage potential impacts of this use.</p>

	as per LSMC 14.44.015(k), and are permitted in R4, WR, R6, R8-12, MFR, MU, and PBD zones as per LSMC Table 14.40-I. However, family day care providers are excluded from other zones where residential dwellings are allowed (including locations that only permit apartments above permitted nonresidential uses).		
f. Manufactured housing is regulated the same as site built housing. RCW 35.21.684 amended in 2019, RCW 35.63.160, RCW 35A.21.312 amended in 2019 and RCW 36.01.225 amended in 2019. A local government may require that manufactured homes: (1) are new, (2) are set on a permanent foundation, and (3) comply with local design standards applicable to other homes in the neighborhood, but may not discriminate against consumer choice in housing. See: National Manufactured Housing Construction and Safety Standards Act of 1974	Yes. The definitions of manufactured housing provided in LSMC 14.08.010 do not preclude their definition as a single-family detached unit as long as they can be defined as a "structure". Note that manufactured /mobile home parks are	Yes	It may be useful to provide clarity in the Code that manufactured homes are regulated the same as site-built housing, provided the conditions under RCW 35.21.684(1), as this is not explicit.

	regulated separately as per LSMC Table 14.40-I, and allowed only as an administrative conditional use in many residential zones. However, individual units are permitted separately.		
g. Accessory dwelling units: cities (and counties) must adopt or amend by ordinance, and incorporate into their development regulations, zoning regulations and other official controls the requirements of RCW 36.70A.698 amended in 2021. Review RCW 36.70A.696 amended in 2021 through 699 and RCW 43.63A.215(3) Watch for new guidance from Commerce on the Planning for Housing webpage.	N/A. Note that these provisions under RCW 36.70A.698 do not apply in Lake Stevens, given that there are no "major transit stops" in the city as per RCW 36.70A.696(7) .	N/A	
h. Residential structures occupied by persons with handicaps, and group care for children that meets the definition of "familial status" are regulated the same as a similar residential structure occupied by a family or other unrelated individuals. No city or county planning under the GMA may enact or maintain ordinances, development regulations, or administrative practices which treat a residential structure occupied by persons with handicaps differently than a similar residential structure	No. Uses such as child residential mental health care, private adult treatment homes, and residential facilities for the disabled may be managed under LSMC	Yes	Also see RCW 35A.63.240. Note that under 42 U.S.C. Sec. 3602(h), these provisions do not cover illegal drug addiction.  Note that the provisions of RCW 36.70A.410 may apply differently depending on the design and scale of the development.

occupied by a family or other unrelated individuals. RCW 36.70A.410, RCW 70.128.140 and 150, RCW 49.60.222-225 and WAC 365-196-860	14.08.010 as Level I or II Health and Social Service Facilities. These designations are not permitted in all areas where potentially comparable residential structures are allowed, as per LSMC Table 14.40-I. This includes areas where apartments are allowed		
i. Affordable housing programs enacted or expanded under RCW 36.70A.540 amended in 2022 comply with the requirements of this section. Examples of such programs may 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. WAC 365-196-300 See also RCW 36.70A.545 and WAC 365-196-410(2)(e)(i) "affordable housing" is defined in RCW 84.14.010 Review RCW 36.70A.620 amended in 2020 for minimum residential parking requirements	N/A. Note that provisions that allow additional height under LSMC 14.38.050 in exchange for public benefits (including affordable housing) are not covered under this provision.	No	Note that the provisions in LSMC 14.38.050(7) need to be significantly revised, as the definitions of rental and owner-occupied housing affordability are not correct. The city may also investigate the potential of including additional height, bulk, and density incentives under RCW 36.70A.540.  Also note that provisions in RCW 35A.63.300 regarding density bonuses for affordable housing on property owned by religious organizations need to be incorporated into the Code. This would apply to housing affordable to households at 80% of median family income.
j. Limitations on regulating: outdoor encampments, safe parking efforts, indoor overnight shelters and	No. Note that provisions	Yes	Note that the reference provided in the checklist is specifically for counties. RCW 35A.21.360 is the



temporary small houses on property owned or controlled by a religious organization. RCW 36.01.290 amended in 2020	for timing under LSMC 14.44.038(b) for outdoor encampments do not comply with restrictions under RCW 35A.21.360(2)(d) regarding the period, frequency, and number of encampments allowed. Also note that zoning restrictions on temporary encampments may not be allowed as per LSMC Table 14.40-I if they contravene RCW 35A.21.360(2)(a) by not allowing encampments altogether on sites owned by religious organizations.		specific reference for code cities. Separation requirements of 1,000 feet are allowed under RCW 35A.21.360(2)(f) for multiple encampments. Also note that RCW 35A.21.360 includes provisions for safe parking, indoor overnight shelters, and temporary small houses which may need to be considered. Although the lack of such ordinances may not be out of compliance with statute, these uses may also need to be included in the Code (potentially as part of a memorandum of understanding).
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k. Regulations discourage incompatible uses around general aviation airports. RCW 36.70.547 and WAC 365-196-455. Incompatible uses include: high population intensity uses such as schools, community centers, tall structures, and hazardous wildlife attractants such as solid waste disposal sites, wastewater or stormwater treatment facilities, or stockyards. For more guidance, see WSDOT's Aviation Land Use Compatibility Program.	No	Yes	Airports are currently only conditionally allowed in General Industrial Zones as per Table 14.40-III: Table of Special Uses by Zones in the Lake Stevens Municipal Code. However there is no language limited uses around general aviation airports.
l. If a U.S. Department of Defense (DoD) military base employing 100 or more personnel is within or adjacent to the jurisdiction, zoning should discourage the siting of incompatible uses adjacent to military base. RCW 36.70A.530(3) and WAC 365-196-475. Visit Military One Source to locate any bases in your area and 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.	N/A	No	No DoD military bases are within or adjacent to the Lake Stevens jurisdiction
m. <u>Electric vehicle infrastructure (jurisdiction specified: adjacent to Interstates 5, 90, 405 or state route 520 and other criteria) must be allowed as a use in all areas except those zoned for residential, resource use or critical areas. <a href="#">RCW 36.70A.695</a></u>	No	No	Lake Stevens is not adjacent to I-5, I-90, I-405, or SR-520 and is not required to accommodate electric vehicle infrastructure under RCW 36.70A.695

## Shoreline Master Program

Shoreline Master Program Consistent with RCW 90.58 Shoreline Management Act of 1971			
Element:	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes:
a. <u>Zoning designations are consistent with Shoreline Master Program (SMP) environmental designations. <a href="#">RCW 36.70A.480</a></u>	Yes	No	
b. If updated to meet RCW 36.70A.480 (2010), SMP regulations provide protection to critical areas in shorelines that is at least equal to the protection provided to critical areas by the critical areas ordinance. RCW 36.70A.480(4) and RCW 90.58.090(4) See Ecology's shoreline planners' toolbox for the SMP Checklist and other resources and Ecology's Shoreline Master Programs Handbook webpage	Yes	No	

## Resource Lands

<b>Resource Lands</b> <b>Defined in RCW 36.70A.030(3), (12) and (17) and consistent with RCW 36.70A.060 and RCW 36.70A.170</b>			
<b>Element:</b>	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	<b>Notes:</b>
a. Zoning is consistent with natural resource lands designations in the comprehensive plan and conserves natural resource lands. RCW 36.70A.060(3), WAC 365-196-815 and WAC 365-190-020(6). Consider innovative zoning techniques to conserve agricultural lands of long-term significance RCW 36.70A.177(2). See also WAC 365-196-815(3) for examples of innovative zoning techniques.	Yes	No	
b. Regulations to assure that use of lands adjacent to natural resource lands does not interfere with natural resource production. RCW 36.70A.060(1)(a) and WAC 365-190-040 Regulations require notice on all development permits and plats within 500 feet of designated natural resource lands that the property is within or near a designated natural resource land on which a variety of commercial activities may occur that are regulations to implement comprehensive plan	Yes	No	
c. <u>For designated agricultural land, regulations encourage nonagricultural uses to be limited to lands with poor</u>	N/A	N/A	

soils or otherwise not suitable for agricultural purposes. Accessory uses should be located, designed and operated to support the continuation of agricultural uses. <a href="#">RCW 36.70A.177(3)(b)</a>			
d. Designate mineral lands and associated regulations as required by RCW 36.70A.131 and WAC 365-190-040(5). For more information review the WA State Dept. of Natural Resources (DNR)'s Geology Division site	N/A	N/A	

## Siting Essential Public Facilities

### Siting Essential Public Facilities

Regulations for siting essential public facilities should be consistent with RCW 36.70A.200 and consider WAC 365-196-550. Essential public facilities include those facilities that are typically difficult to site, such as airports, state education facilities, state or regional transportation facilities, 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. Regulations may be specific to a local jurisdiction, but may be part of county-wide planning policies (CWPPs).

Element:	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes:
Regulations or CWPPs include a process for siting EPFs and ensure EPFs are not precluded. RCW 36.70A.200(2), (3), (5). WAC 365-196-550(6) lists process for siting EPFs. WAC 365-196-550(3) details preclusions. EPFs should be located outside of known hazardous areas. Visit Commerce's Behavioral Health Facilities Program page for information on establishing or expanding new capacity for behavioral health EPFs.	Yes <a href="#">14.16C.060</a>	Yes	Process for siting of EPFs is included but language relating to hazardous area proximity could be added to improve existing regulations

## Subdivision Code

Subdivision Code			
Element:	In Current Regs?	Changes Needed?	Notes:
a. Subdivision regulations are consistent with and implement comprehensive plan policies. RCW 36.70A.030(5) and 36.70A.040(4).	Yes	No	Subdivision regulations are consistent with and implement comprehensive plan policies
b. Written findings to approve subdivisions establish adequacy of public facilities. RCW 58.17.110 amended in 2018 <ul style="list-style-type: none"> <li>· Streets or roads, sidewalks, alleys, other public ways, transit stops, and other features that assure safe walking conditions for students.</li> <li>· Potable water supplies, sanitary wastes, and drainage ways. RCW 36.70A.590 amended 2018</li> <li>· Open spaces, parks and recreation, and playgrounds</li> <li>· Schools and school grounds</li> </ul> Other items related to the public health, safety and general welfare WAC 365-196-820(1).	Yes	No	Could improve regulations requiring listed written finding for subdivision approval, may require further discussion with COLS Planning team.
c. Preliminary subdivision approvals under RCW 58.17.140 are valid for a period of five or seven years (previously five years). RCW 58.17.140 and RCW 58.17.170 Note: preliminary plat approval is valid for: seven years if the date of preliminary plat approval is on or before December 31, 2014; five years if the preliminary plat approval is issued on or after January 1, 2015; and ten years if the project is located within city limits, not subject to the shoreline management act, and the preliminary plat is approved on or before December 31, 2007.	Yes <a href="#">14.16A.250</a>	No	Preliminary subdivision approvals are valid for 5 years with a maximum 2 year extension by the Planning Department

## Stormwater

Stormwater			
Element:	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute?	Notes:
<p>a. Regulations protect water quality and implement actions to mitigate or cleanse drainage, flooding, and storm water run-off that pollute waters of the state, including Puget Sound or waters entering Puget Sound. RCW 36.70A.070(1) Regulations may include: adoption of a stormwater manual consistent with Ecology's latest manual for Eastern or Western Washington, adoption of a clearing and grading ordinance –See Commerce's 2005 Technical Guidance Document for Clearing and Grading in Western Washington.</p> <p>Adoption of a low impact development ordinance. See Puget Sound Partnership's 2012 Low Impact Development guidance and Ecology's 2013 Eastern Washington Low Impact Development guidance.</p> <p>Additional Resources: Federal Grants to Protect Puget Sound Watersheds, Building Cities in the Rain, Ecology Stormwater Manuals, Puget Sound Partnership Action Agenda</p>	<p>Yes</p> <p><a href="#">11.06</a></p>	No	
<p>b. Provisions for corrective action for failing septic systems that pollute waters of the state. RCW 36.70A.070(1). See also: DOH Wastewater Management, Ecology On-Site Sewage System Projects &amp; Funding</p>	No	Yes	Regulations addressing corrective action for septic system failure is required



## Impact Fees

<b>Impact Fees</b> <b>May impose impact fees on development activity as part of the financing for public facilities, provided that the financing for system improvements to serve new development must provide for a balance between impact fees and other sources of public funds; cannot rely solely on impact fees.</b>			
<b>Element:</b>	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	<b>Notes:</b>
a. If adopted, impact fees are applied consistent with RCW 82.02.050 amended in 2016, .060 amended in 2021, .070, .080, .090 amended in 2018 and .100. <a href="#">WAC 365-196-850</a> provides guidance on how impact fees should be implemented and spent.	Yes. Provisions of Chapters 14.100 (school), 14.112 (traffic), and 14.120 (parks) LSMC are generally consistent with requirements under the statute.	No	Note that capital facilities planning needs to be updated in the Comprehensive Plan to be consistent with the use of funds under LSMC 14.120.130(b).
b. Jurisdictions collecting impact fees must adopt and maintain a system for the deferred collection of impact fees for single-family detached and attached residential construction, consistent with RCW 82.02.050(3) amended in 2016	Yes. See Chapter 14.124 LSMC.	No	
c. If adopted, limitations on impact fees for early learning facilities RCW 82.02.060 amended in 2021	Yes. Note that park and school impact fees are calculated for residential uses only, and traffic mitigation impact fees are specifically calculated	No	Note that the Code does not include optional reductions in impact fees for early learning facilities as per RCW 82.02.060(2) and (4).

	based on peak hourly trips (with adjustments based on pass-through/pass-by trips) as per LSMC 14.120.080. This fulfills the requirement under RCW 82.02.060(3).		
d. If adopted, exemption of impact fees for low-income and emergency housing development RCW 82.02.060 amended in 2021. See also definition change in RCW 82.02.090(1)(b) amended in 2018	No. While an exemption for low-income housing is not currently in place, the Code should explicitly state that emergency housing is not subject to impact fees as per RCW 82.02.090(1)(b).	Yes	Also note that the City should explore the use of 80% impact fee waivers under RCW 82.02.060(4) for affordable housing.

## Concurrency and Transportation Demand Management

<b>Concurrency and Transportation Demand Management (TDM)</b> <b>Ensures consistency in land use approval and the development of adequate public facilities as plans are implemented, maximizes the efficiency of existing transportation systems, limits the impacts of traffic and reduces pollution.</b>			
<b>Element:</b>	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	<b>Notes:</b>
a. The transportation concurrency requirement includes specific language that prohibits development when level of service standards for transportation facilities cannot be met. RCW 36.70A.070(6)(b), WAC 365-196-840. Note: Concurrency is required for transportation, but may also be applied to park facilities, etc.	Yes  <a href="#">14.110.070</a>	No	
b. Measures exist to bring into compliance locally owned transportation facilities or services that are below the levels of service established in the comprehensive plan. RCW 36.70A.070(6)(a)(iii)(B) and (D). Levels of service can be established for automobiles, pedestrians and bicycles. See WAC 365-196-840(3) on establishing an appropriate level of service.	Partial  <a href="#">14.110</a>	Yes	Incomplete establishment of LoS for pedestrians and bicycles  Limited language outlining measures to bring locally owned transportation facilities or services into LoS compliance
c. Highways of statewide significance (HSS) are exempt from the concurrency ordinance. RCW 36.70A.070(6)(a)(iii)(C)	N/A	No	

d. Traffic demand management (TDM) requirements are consistent with the comprehensive plan. RCW 36.70A.070(6)(a)(vi) Examples may include requiring new development to be oriented towards transit streets, pedestrian-oriented site and building design, and requiring bicycle and pedestrian connections to street and trail networks. WAC 365-196-840(4) recommends adopting methodologies that analyze the transportation system from a comprehensive, multimodal perspective.	Partial	Yes	Additional code is recommended to satisfy consistency with the comprehensive plan.
e. If required by RCW 70.94.527, a commute trip reduction (CTR) ordinance to achieve reductions in the proportion of single-occupant vehicle commute trips has been adopted. The ordinance should be consistent with comprehensive plan policies for CTR and Department of Transportation rules. RCW 70.94.521-551	N/A	N/A	No businesses trigger minimum thresholds

## Tribal Participation

<b>Tribal Participation in Planning new in 2022 (codification pending – see <a href="#">HB 1717</a>)  A federally recognized Indian tribe may voluntarily choose to participate in the county or regional planning process. </b>			
<b>Element:</b>	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	<b>Notes:</b>
a. Mutually agreeable memorandum of agreement between local governments and tribes in regard to collaboration and participation in the planning process unless otherwise agreed at the end of a mediation period RCW 36.70A.040(8)(a) new in 2022	No	No	Goals can be added that state the city will coordinate with tribes on comp plan as a stakeholder
b. <u>Policies consistent with countywide planning policies that address the protection of tribal cultural resources in collaboration with federally recognized Indian tribes that are invited, provided that a tribe, or more than one tribe, chooses to participate in the process. <a href="#">RCW 36.70A.210(3)(i)</a> new in 2022</u>	No	Yes	City will adopt any countywide policies that address tribal cultural resources in collaboration with any tribes which participate in the planning process.

## Regulations to Implement Optional Elements

Regulations to Implement Optional Elements			
Element:	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes:
a. New fully contained communities are consistent with comprehensive plan policies, RCW 36.70A.350 and WAC 365-196-345	N/A	N/A	
b. If applicable, master planned resorts are consistent with comprehensive plan policies, RCW 36.70A.360, RCW 36.70A.362 and WAC 365-196-460	N/A	N/A	
c. If applicable, major industrial developments and master planned locations outside of UGAs are consistent with comprehensive plan policies, RCW 36.70A.365, RCW 36.70A.367 and WAC 365-196-465	N/A	N/A	
d. Regulations include procedures to identify, preserve, and/or monitor historical or archaeological resources. RCW 36.70A.020(13), WAC 365-196-450	Yes	No	
e. Other development regulations needed to implement comprehensive plan policies such as energy, sustainability or design are adopted. WAC 365-196-445	Partial	Yes	
f. Design guidelines for new development are clear and easy to understand; administration procedures are clear and defensible.	Yes	No	

## Project Review Procedures

Project Review Procedures			
Element:	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes:
<p>Project review processes integrate permit and environmental review. RCW 36.70A.470, RCW 36.70B and RCW 43.21C.</p> <p>Also: WAC 365-196-845, WAC 197-11(SEPA Rules), WAC 365-197 (Project Consistency Rule, Commerce, 2001) and Ecology SEPA Handbook.</p> <p>Integrated permit and environmental review procedures for:</p> <ul style="list-style-type: none"> <li>· Notice of application</li> <li>· Notice of complete application</li> <li>· One open-record public hearing</li> <li>· Combining public hearings &amp; decisions for multiple permits</li> <li>· Notice of decision</li> <li>· One closed-record appeal</li> </ul>	Yes	No	

## Plan & Regulation Amendments

### Plan & Regulation Amendments

If procedures governing comprehensive plan amendments are part of the code, then assure the following are true:

Element:	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes:
a. Regulations limit amendments to the comprehensive plan to once a year (with statutory exceptions). RCW 36.70A.130(2) and WAC 365-196-640(3)	Yes	No	
b. Regulations define emergency for an emergency plan amendment. RCW 36.70A.130(2)(b) and WAC 365-196-640(4)	No <a href="#">14.16A</a>	Yes	A process for comprehensive plan amendments exists in the code but does not define "emergency" as it relates to an emergency plan amendment
c. Regulations include a docketing process for requesting and considering plan amendments. RCW 36.70A.130(2), RCW 36.70A.470, and WAC 365-196-640(6)	Yes	No	
d. A process has been established for early and continuous public notification and participation in the planning process RCW 36.70A.020(11), RCW 36.70A.035 and RCW 36.70A.140. See WAC 365-196-600 regarding public participation and WAC 365-196-610(2) listing recommendations for meeting requirements.	Yes	No	
e. A process exists to assure that <u>proposed regulatory or administrative actions do not result in an unconstitutional taking of private property</u> RCW 36.70A.370. See the <a href="#">2018 Advisory Memo on the</a>	Yes	No	



<a href="#">Unconstitutional Taking of Private Property</a>			
f. Provisions ensure adequate enforcement of regulations, such as zoning and critical area ordinances (civil or criminal penalties). See implementation strategy in <a href="#">WAC 365-196-650(1)</a> .	Yes	No	

## Critical Area Ordinances

The City of Lake Stevens has adopted Critical Area Ordinance (CAO) provisions, outlined under Chapter 4 of Lake Stevens' Comprehensive Plan and codified in the City's Municipal Code 14.88. Per the most current CAO checklist from the Department of Commerce, the City's provisions are current and address all relevant requirements. Provisions and definitions relating to best available science (BAS), wetlands, and critical areas are all clearly presented and accurate to the checklist's cited legislation as part of RCW 36.70A and WAC 365-190.

Critical Areas Ordinances			
Requirement	In Plan?	Location	Notes
The CAO includes best available science to clearly designated protect all critical areas that might be found within the jurisdiction.	Yes	Chapter 4, Policies 4.3.1 & 4.3.4	Best Available Science Criteria and definitions more fully laid out in COLSMC 14.88.235
1.Designation of Critical Areas RCW 36.70A.170(1)(d)required all counties and cities to designate critical areas. RCW 36.70A.170(2)requires that counties and cities consider the Commerce Minimum Guidelines pursuant to RCW 36.70A.050.RCW 36.70A.050 directed Commerce to adopt the Minimum Guidelines to classify critical areas. WAC 365-190-080 through 130(updated in 2010)provide guidance on defining or "designating" each of the five critical areas.WAC 365-190-040(updated in 2010)outlines the process to classify and designate natural resource lands and critical areas.	Yes	Page E-9 in Chapter 4	While the City does offer the GIS data through their portal, the layer could be a useful addition to their comprehensive GIS App. The map is the current Comp Plan is acceptable but would be difficult to use functionally as a developer or planner.
2.Definition of Critical Areas RCW 36.70A.030 provides definitions for each type of critical area.Sections (5) regarding fish and wildlife habitat conservation areas; (9) regarding geologically hazardous areas; and (21) regarding wetlands were updated in 2010.WAC 365-190-030(updated 2010) provides definitions in the Minimum Guidelines.	Yes	Chapter 4, p. E-7	Definitions in more detail in COLSMC 14.08, with regulations in 14.88

3. Protection of Critical Areas RCW 36.70A.060 (2) required counties and cities to adopt development regulations that protect the critical areas required to be designated under RCW 36.70A.170. RCW 36.70A.172(1) requires the inclusion of best available science in developing policies and development regulations to protect the functions and values of critical areas. In addition, counties and cities must give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries.	Yes	COLSMC 14.88	Chapter 4 of COLSCP outlines the protections but COLSMC delineates precise protections and development regulations alongside associated permitting requirements
4. Inclusion of Best Available Science RCW 36.70A.172(1) requires inclusion of the best available science (BAS). Chapter 365-195 WAC outlines recommended criteria for determining which information is the BAS, for obtaining the BAS, for including BAS in policies and regulations, for addressing inadequate scientific information, and for demonstrating "special consideration" to conservation or protection measures necessary to preserve or enhance anadromous fisheries. WAC 365-195-915 provides criteria for including BAS in the record.	Yes	Chapter 4, Policies 4.3.1 & 4.3.4 & COLSMC 14.88.235	
The definition of wetlands is consistent with RCW 36.70A.030(21) (updated in 2012)	Yes	COLSMC 14.88 part VIII and COLSCP Ch. 4 p. E-8	
Wetlands are delineated using the 1987 Federal Wetland Delineation Manual and Regional Supplements in accordance with WAC 173-22-035 (updated in 2011).	Yes	COLSMC 14.88.805	
Policies and regulations protect the functions and values of wetlands.	Yes	COLSCP Chapter 4 Goal 4.3; COLSMC 14.88.820 through 14.88.840	

## PSRC Checklist

Upon meeting with PSRC's Plan Review Team and referencing their review of the 2015 Plan – which does not consider annual updates – the main concern of the organization was internal consistency. The team highlighted a lack of consistency between the land use assumptions present in the Land Use and Housing elements compared to the assumptions applied in the Transportation element. While the work will be split across two firms and the City's staff in these update efforts, the SBN team is committed to working closely with Transpo to ensure our assumptions are consistent and present a plan which addresses these issues.

Furthermore, the plan review team highlighted a few opportunities for improvement in the existing plan. First, deeper consideration of people of color, people with low incomes, and historically underserved communities could support a plan which speaks to the distinct characteristics and changing population of Lake Stevens. These efforts, outlined in PSRC's checklist tie in with Commerce's push for analyzing racially disparate impacts of housing policy and tie themes of equity in planning throughout. Within the Housing and Land Use elements, these focuses could also tie in displacement considerations coherently and effectively.

The plan review team also identified the potential for representing how goals and policies across chapters connect to better reflect PSRC's approach to comprehensive planning guidelines and uniting planning efforts across elements. Many of the plan's goals and policies interact, and the division into distinct elements sometimes can create difficulties in understanding these interactions among members of the public and issues when updating distinct elements of the plan for City staff and consultants. Clarifying connections would support a better understating of how the plan integrates consistent applications of recommendations, public input, and compliance considerations while also supporting the City's planners in their annual update process by identifying where cross-element and cross-plan updates will be required.

Land use, transportation, climate change, community health, and equity are themes that span multiple elements, and there are opportunities to better represent how these topics intersect and interact across the plan's chapters. Visual cues and brief explanations could improve both how internal consistency is presented to end-users of the plan and the cross-element update process presented by annual docket updates – directly addressing Policy 1.2.1. Expanding this to include functional plans would go a step further, addressing Policy 1.2.2.

## Regional Collaboration

Regional Collaboration	Page or Policy Ref
Include a statement about how the plan relates to countywide planning policies, VISION 2050, and planning requirements of the Growth Management Act	Yes; Introduction Pages 1-3 and 4
Coordinate with other jurisdictions, agencies, tribes, ports, military installations, special purpose districts, and adjacent regions (RCW 36.70A.070(6)(a)(v), MPP-RC-1, RC-4-5)	Yes; Introduction section titled "Planning Context"
Prioritize services and access to opportunity for people of color, people with low incomes, and historically underserved communities to ensure all people can attain the resources and opportunities to improve quality of life and address past inequities (MPP-RC-2)	Not explicitly: there are mentions of access to opportunities, resident input, and demographic changes which are related to this point. However, the plan could address this issue more clearly.
Address land use, transportation, and housing opportunities and challenges related to military installations, when applicable (MPP-RC-6)	NA, there are no military installations in Lake Stevens.
Prioritize investments in centers, including regional centers, countywide centers, high-capacity transit areas with a station area plan, and other local centers (MPP-RC-8-9)	Yes; Transportations goals 8.7 and 8.8 address linking residents to regional and local centers, Land Use chapter mentions growth centers and maps them alongside goals 2.3 and 2.4 which relate to the subject
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)	Partial, previous PSRC feedback mentions a lack of clarity in this regard, and an opportunity to improve this cycle

## Regional Growth Strategy

Regional Growth Strategy	Page or Policy Ref
Incorporate housing and employment targets (MPP-RGS-1-2)	Housing tables 3.4 and 3.5, and regional collaboration sections in Housing, Land Use, and Transportation chapters all mention Vision 2040 targets and SnoCo CWPPs
Use land use assumptions substantially consistent with countywide growth targets (RCW 36.70A.070, WAC 365-196-430, VISION 2050 Regional Growth Strategy)	Land use assumptions in the land use chapter are consistent with targets, but internal consistency between land use and transportation is lacking
Demonstrate sufficient zoned development capacity to accommodate targets (RCW 36.70A.115)	Yes: Land Use Table 2.4
Use consistent land use assumptions throughout plan (RCW 36.70A.070, WAC 365-196-430)[1]	No: Land use assumptions differ between housing, land use, and transportation
Encourage infill development and increased density in locations consistent with the Regional Growth Strategy (MPP-RGS-6)	Yes: Housing Goal 3.3 & associated policies
Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high-capacity transit (MPP-RGS-12)	Yes; unclear if it's referenced directly but all development capacity appears consistent with regional strategies and is references as such in all relevant chapters. Land Use Chapter Table 2.5 lines out strategies which are all consistent with MPP-RGS-12
<a href="#">Where applicable, focus a significant share of growth in designated regional growth centers, high-capacity transit station areas, manufacturing/industrial centers, and countywide centers (MPP-RGS-8-11)[1]</a>	Yes: references to subarea plans and growth centers in Land Use and Housing Chapters make this clear.
Include growth targets for designated regional growth centers and manufacturing/industrial centers (MPP-RGS-2)	No specific call-out, but there are no regional growth centers in Lake Stevens. The nearest is Everett.

## Environment

Environment	Page or Policy Ref
Protect critical areas, habitat, and water quality and coordinate planning with adjacent jurisdictions, tribes, countywide planning groups, and watershed groups (MPP-En-1, En-6, En-11-12, En-14, En-16, En-Action-3)	All Goals in Environment & Natural Resources Chapter and their associated policies
Advance integrated and interdisciplinary approaches for environmental planning and assessments (MPP-En-2)	None
Promote innovative and environmentally sensitive development practices in siting, design, materials selection, construction, and maintenance (MPP-En-5)	Policy 4.1.6
Support programs to ensure that all residents, regardless of race, social, or economic status, have clean air, clean water, and other elements of a healthy environment and prioritize the reduction of impacts to vulnerable populations that have been disproportionately affected (MPP-En-3-4, En-7-8, En-21)	None
Support and incentivize environmental stewardship on private and public lands (MPP-En-10)	Support in 4.1.1, 4.1.4, 4.1.7, 4.1.15, 4.3.6, 4.3.3, throughout.; incentives in 4.1.5, 4.1.6
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)	Chapter 5 P-26 to 28, Goals 5.1, 5.2, 5.4, 5.5, and associated policies
Protect and restore native vegetation and tree canopy (MPP-En-9, En-13)	Native Growth Protection Areas: referenced in PROS Element Table 5.1 & Policy 4.1.2, 4.1.10
Protect and restore hydrological functions and water quality, including restoring shorelines and estuaries, removing fish-blocking culverts, reducing use of toxic products, and retrofitting basins to manage stormwater (MPP-En-16-20)	Goals 4.2 and 4.3; associated policies 4.2.1, 4.2.9, 4.3.2, 4.3.6, 4.3.7
Ensure all federal and state air quality standards are met and reduce emissions of air toxics and greenhouse gases (WAC 173-420-080, MPP-En-22)	8.13.1, Chapter 4 P. E-6

## Climate Change

Climate Change	Page or Policy Ref
Support achieving regional greenhouse gas emission reduction goals by: Electrifying the transportation system, · Reducing vehicle miles traveled through increasing alternatives to driving alone and using land use strategies that reduce trips and trip length, and · Expanding the use of conservation, alternative energy sources, and energy management technology (MPP-CC-1, CC-3, CC-5, CC-11-12, CC-Action-3)	4.9.2, 4.9.4, 8.13.2, 8.13.3, 8.13.5
Reduce building energy use through green building and retrofit of existing buildings (MPP-CC-2, CC-Action-3, DP-46)	4.1.6
Protect and restore natural resources that sequester and store carbon (MPP-CC-4)	4.1.1, 4.1.3, 4.3.5
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)	None
Identify and address the impacts of climate change and natural hazards on the region to increase resilience (MPP-CC-7-10, CC-Action-4)	None
Address rising sea water by siting and planning for relocation of hazardous industries and essential public services away from the 500-year floodplain (MPP-CC-10)	No mention of relocation, but policies under Goal 4.3 mention mitigation of flooding



## Land Use / Development Patterns

Land Use/Development Patterns	Page or Policy Ref
Support inclusive community planning (MPP-DP-2, MPP-DP-8)	<a href="#">Policy 2.3.11</a> <a href="#">Policy 2.4.3</a>
Support the development of compact urban communities and central places with densities that support the Regional Growth Strategy, transit, and walking (MPP-RGS-6, DP-1, DP-3)	<a href="#">Policy 2.3.10</a> <a href="#">Goal 2.14</a>
Reduce disparities in access to opportunity and expand employment opportunities to improve the region's shared economic future (MPP-DP-2, Ec-8, Ec-13)	<a href="#">Goal 2.4</a>
Coordinate with local, state, and federal agencies to identify underused lands such as surplus public lands or environmentally contaminated lands and: Promote infill or redevelopment in growth centers and existing neighborhoods in a manner that supports the Regional Growth Strategy (MPP-DP-4) Develop strategies for cleaning up brownfield and contaminated sites (DP-Action-7)	<a href="#">Policy 2.3.3</a>
Preserve historic, visual, and cultural resources and consider potential impacts to culturally significant sites and tribal treaty fishing, hunting, and gathering grounds (MPP-DP-5-7)	<a href="#">Goal 2.13</a>
Support inclusive engagement to ensure land use decisions do not negatively impact historically marginalized communities (MPP-DP-8)	None
Support the design of transportation and infrastructure projects that achieve community development objectives and improve communities (MPP-DP-12-15, DP-17)	8.2.2, 8.3.4, 8.4.1, Goals 8.6, 8.7, and associated policies
Reduce health disparities and improve health outcomes (MPP-RC-3, DP-18)	3.3.2
Identify one or more central places as locations for more compact, mixed-use development (MPP-DP-22, DP-25)	<a href="#">Goal 2.5</a>
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)	None

<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> </ul> <p>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)</p>	<a href="#">Goal 2.9</a>
<p>As applicable, limit incompatible uses adjacent to:</p> <ul style="list-style-type: none"> <li>· Military lands (MPP-DP-49)</li> <li>· Manufacturing/industrial centers (MICs) and industrial zoning (MPP-DP-50)</li> </ul> <p>Tribal reservation lands (MPP-DP-51)</p>	<a href="#">Policy 2.6.3</a>

## Housing

Housing	Page or Policy Ref
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)	Chapter 3 H-6 through H-12
Increase housing supply and densities to meet the region's current and projected needs at all income levels consistent with the Regional Growth Strategy (MPP-H-1)	3.2.2 and throughout, including the housing needs analysis and H-13 to 15 Land Use Strategies
Expand the diversity of housing types for all income levels and demographic groups, including low, very low, extremely low, and moderate-income households (MPP-H-2-6, H-9)	H-13 Land Use Strategies, 3.3.2, 3.3.3, 3.3.4, 3.3.5
Expand housing capacity for moderate density housing, i.e., "missing middle" (MPP-H-9)	H-13 to 14 land use strategies, 3.3.1, 3.3.2
Promote jobs-housing balance by providing housing choices that are accessible and attainable to workers. Include jobs-housing balance in housing needs assessments to better support job centers with the needed housing supply (MPP-H-1, H-6, H-Action-4)	3.1.2, 3.5.1
Expand housing choices in centers and near transit (MPP-H-7-8)	H-15 Land Use Strategies, policy 3.2.2 for specific groups
Promote flexible standards and innovative techniques to encourage housing productions that keeps pace with growth and need (MPP-H-10)	Goals 3.1 and specifically goal 3.3 and associated policies
Use inclusionary and incentive zoning to provide more affordable housing when creating additional housing capacity (H-Action-5)	H-14 Land Use Strategies, 3.3.4
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)	No mention of displacement
Promote homeownership opportunities while recognizing historic inequities in access to homeownership opportunities for communities of color (MPP-H-5)	No mention of historic inequities, but homeownership is promoted by policies under

	Goals 3.1 and 3.3
Identify and begin to undo local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including zoning that may have a discriminatory effect and areas of disinvestment and infrastructure availability	No mention of racially disparate impacts
Identify and enhance industry clusters, including those recognized in the Regional Economic Strategy that provide goods and services for export (MPP-Ec-3, Ec-4)	Land Use Strategies H-13 and 14; Goal 3.1.3
Focus retention and recruitment efforts and activities to foster a positive business climate and diversify employment opportunities by specifically targeting: · Businesses that provide living wage jobs Locally, women-, and minority-owned small businesses and start-up companies Established and emerging industries, technologies, and services that promote environmental sustainability, especially those addressing climate change and resilience (MPP-Ec-1, Ec-3, Ec-4, Ec-7, Ec-9, Ec-16)	6.3.1 mentions the Lake Stevens demographic, 6.8.1 and 6.8.2 broadly refer to unique obstacles but the plan could expand on some of these finer points
Promote strategies and policies that expand access to opportunity and remove barriers for economically disconnected communities (MPP-Ec-13-14)	6.8.2
Address and prevent potential physical, economic, and cultural displacement of existing businesses that may result from redevelopment and market pressure (MPP-Ec-12)	Goal 6.7:
Develop a range of employment opportunities to create a closer balance between jobs and housing (MPP-Ec-18)	3.5.2, 6.2.2, 6.2.3
Promote environmental and socially responsible business practices, especially those addressing climate change, resilience, and improved health outcomes (MPP-Ec-8, Ec-16)	6.1.3 gets vaguely close but could be clearer
Support, recognize, and empower the contributions of the region's culturally and ethnically diverse communities, institutions, and Native Tribes (MPP-Ec-15, Ec-17, Ec-20)	Not mentioned

## Public Services

Public Services	Page or Policy Ref
Protect and enhance the environment and public health and safety when providing services and facilities (MPP-PS-1)	Ch.4 p.E-4 briefly mentions public health across demographics
Promote coordinated planning for services and facilities with counties, cities, tribes, and special purpose districts in a manner that supports the Regional Growth Strategy, including addressing long-term needs, supply, and the use of conservation and demand management (MPP-PS-3-4, PS-8-9, PS-13-14, PS-23-25)	<a href="#">PS-19</a> GOAL 7.1
Protect water quality by replacing failing septic systems and serving new urban development with sanitary sewer systems (MPP-PS-10-12)	<a href="#">PS-22</a> Policy 7.6.6
Consider the potential impacts of climate change on public facilities and support the necessary investments to move to low-carbon energy sources (MPP-PS-13-15, PS-20-21)	<a href="#">PS-24</a> GOAL 7.9
Promote affordable and equitable access of public services, including drinking water and telecommunication infrastructure, to provide access to all communities, especially underserved communities (MPP-PS-2, PS-16, PS-22)	None; although the Page E-4 references briefly mentions demographic disparities
Encourage planning and coordination of emergency management and public safety programs (MPP-PS-17, T-31)	PS-19 Policy 7.1.2
Locate community facilities and services, including civic places like parks, schools, and other public spaces, in centers and near transit, with consideration for climate change, economic, social and health impacts (MPP-PS-18, PS-20, PS-29, DP-11)	Goals 2.2 and 2.3
Promote working with school districts on school siting and design to support safe, walkable access, including strategies to provide adequate urban capacity for new schools and to avoid serving urban students with schools in the rural area (MPP-PS-26-28)	<a href="#">PS-21</a> Policy 7.4.2

## Transportation

Transportation	Page or Policy Ref
Promote the development of an efficient, multimodal transportation system that supports the Regional Growth Strategy in collaboration with other jurisdictions and agencies (MPP-T-7)	8.3.3
Work to develop and operate a safe and convenient system for all users and the movement of freight and goods (MPP-T-11)	Partial; 8.2.2 but could be stronger
Reduce the need for new capital improvements through investments in operations, pricing programs, demand management strategies, and system management activities that improve the efficiency of the current system (RCW 36.70A.070(6)(a)(vi), MPP-T-3)	8.17.3
Emphasize transportation investments that provide alternatives to single occupancy vehicle travel, increase travel options, especially to and within centers, and support compact, pedestrian- and transit-oriented densities and development (MPP-T-12-13, T-15)	Partial; 8.8.6 could be stronger
Increase the resilience of the transportation system and support security and emergency management (MPP-T-31)	8.17.5 but could be stronger
Prepare for changes in transportation technologies and mobility patterns (MPP-T-33-34)	No current policy
Focus system improvements to connect centers and support existing and planned development as allocated by the Regional Growth Strategy (MPP-RC-7-9, T-7-8, T-15)	8.8.1, could be improved
Prioritize multimodal investments in centers and high-capacity station areas (MPP-RC-7-10, T-12-13, T-19)	8.9.5 but could be stronger
Promote the design of transportation facilities that support local and regional growth centers and high-capacity transit station areas and fit the community in which they are located (MPP-T-19-21)	8.8.2
Support a safe and welcoming environment for walking and bicycling (MPP-DP-15): · Include a pedestrian and bicycle component and collaborative efforts to identify planned improvements for pedestrian and bicycle facilities and corridors (RCW 36.70A.070(6)(a)(vii)) · Improve local street patterns and design to promote walking and biking (MPP-T-16-17)	8.7, 8.9.2
Support alternatives to driving alone, including walking, biking, and transit use, through design of local streets, land use development tools, and other practices (MPP-T-16-18)	8.9.1; 8.9.2; 8.9.3; 8.9.4
<u>Identify racial and social equity as a core objective when planning and</u>	No current policy

implementing transportation improvements, programs, and services (MPP-T-9)	
Ensure mobility choices for people with special needs (MPP-T-10)	8.9.7
Recognize the critical role of safe, reliable, and efficient movement of people and goods (MPP-Ec-6, T-1, T-23)	8.17.1
Identify and support key facilities and improvements that connect the region to major transportation hubs such as ports, airports, and designated freight routes (MPP-T-24-25)	8.2.3
Promote coordination with providers of major regional infrastructure, such as freight rail and commercial aviation (MPP-Ec-4-5, T-27-28)	No current policy
Promote clean transportation programs and facilities, including actions to reduce air pollution and greenhouse gas emissions from transportation (MPP-CC-3, CC-12, T-29-30)	8.13
Reduce stormwater pollution from transportation facilities and improve fish passage (MPP-T-32)	Partial; 8.15.4 complies but could be improved
Incorporate environmental factors into transportation decision-making, including attention to human health and safety (MPP-DP-44, T-4-5, T-29-32)	No current policy

## Conclusion

The City of Lake Stevens Comprehensive Plan presents a robust vision of the community's present and future with a commitment to public engagement and regional collaboration. The plan needs minor compliance updates to its Comprehensive Plan to comply with statutory requirements and address gaps identified in the plan, but the plan review team does not anticipate a major overhaul this cycle. In general, the Plan has adapted to shifts in regional planning and legislation well, and most updates are reflecting new changes to legislation, rather than fixing what already exists.

There are some concerns raised by the plan review team and by PSRC regarding land use assumption consistency. Transparency of communication between SBN, Transpo, and the City should ensure that issue is not raised again upon the completion of this update. The Housing Element requires updates to align with recent changes to state laws and more clearly address racial disparity, discriminatory zoning practices, and displacement. Continued Public participation will inform some of these issues, and current efforts in the City's housing planning could support these subjects. Other elements contain opportunities for improvement, but largely are adequate as it stands. Overall, the plan review team emphasizes the need for internal consistency, considerations of equity, and community involvement.