



May 2, 2024

Snohomish County Council
2024 Comprehensive Plan Update Project Team
Snohomish County PDS

RE: 2024 Comprehensive Plan Update – County Council Briefings 5/7/2024

The City of Monroe appreciates this opportunity to provide comments, to be included in the official record, regarding the Draft 2024 Snohomish County Comprehensive Plan.

On April 23, 2024, at a Regular Business Meeting, City staff provided the Monroe City Council with an update on Snohomish County's 2024 Comprehensive Plan update process. This included an overview of the three Land Use Alternatives considered in the environmental review, and an overview of proposed changes to each chapter and element.

The City generally concurs with the Snohomish County Planning Commission and the County Executive's recommendation to support Future Land Use Maps (FLUMs) Alternative 2 and concurs with the findings, mitigation and unavoidable impacts identified in the Draft Environmental Impact Statement (DEIS) issued on September 6, 2023. The population, housing and employment concentrations within the Metropolitan, Core and High Capacity Transit Communities is consistent with the Puget Sound Regional Council's Vision 2050. This is also consistent with Sound Transit's and Community Transit's long range plans relating to the location of high capacity transit in Snohomish County via light rail and/or bus rapid transit (BRT).

On October 23, 2023 the City of Monroe submitted a letter into the record for the public hearing proceeding before the Planning Commission (Comments on Comprehensive Plan Update – PC Hearing 10/24/2023). At that time the City expressed opposition to the proposed changes to the Matlby UGA and Council Motion 22-099 to expand Monroe's UGA between Roosevelt Road and US-2 as identified on the Future Land Use Maps (FLUMs).

The City continues to oppose all the proposed changes to the Matlby UGA and County Council Motion 22-099 to expand Monroe's UGA between Roosevelt Road and US-2 as identified on the Future Land Use Maps (FLUMs). Below are the City's concerns.

Maltby

The planning goals of Washington's Growth Management Act (GMA) include:

- Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.

- Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.
- Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.

Puget Sound Regional Council’s Vision 2050 regional growth strategy states, “the region accommodates growth in urban areas, focused in designated centers and near transit stations, to create healthy, equitable, vibrant communities well-served by infrastructure and services...” And Regional Growth Strategy Policy MPP-RGS-13 states, Plan for commercial, retail, and community services that serve rural residents to locate in neighboring cities and existing activity areas to avoid the conversion of rural land into commercial uses.”

The City of Monroe has consistently maintained that urban level development should occur within city limits where urban services are available, not in unincorporated county with the limited exception of the identified High Capacity Transit (HCT) Communities within the Southwest MUGA. Maltby is not an incorporated jurisdiction or a HCT Community with access to urban level services and is generally characterized by suburban to rural development patterns. Increases in the Maltby UGA and/or increases in land use development intensities further competes with Monroe and other incorporated cities for jobs and housing needed to achieve the population, housing, and employment allocations adopted in the Snohomish Countywide Planning Policies.

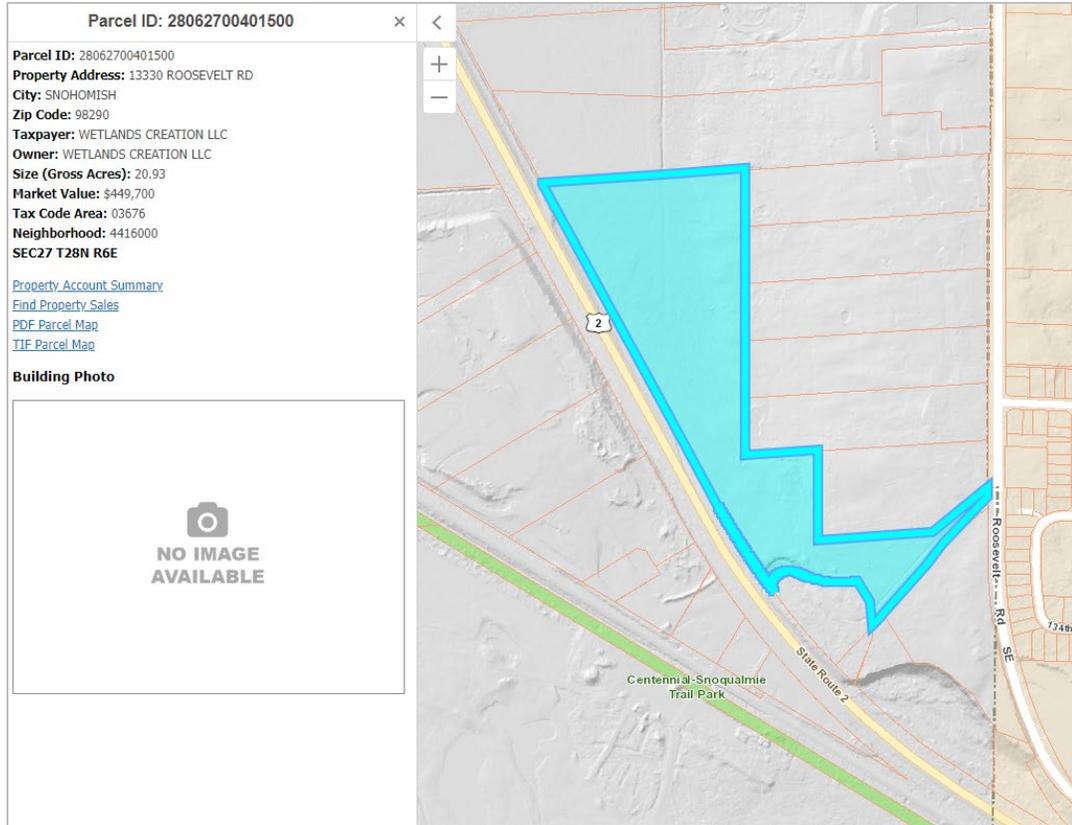
Roosevelt Rd

Cities should have the authority to determine how and where they grow. In 2005, the City of Monroe, through its periodic comprehensive plan update process, identified a preferred UGA expansion into the southwest RUTA. This was not supported by the County and therefore no further action was taken. During this periodic update process the County Council initiated the Roosevelt application, Council Montion 22-099, which is not consistent with the City’s preferred long term growth strategy.

The following comments were provided to the County Planning Commission as part of the DEIS and public hearing process that further supports the City’s opposition to this UGA expansion request:

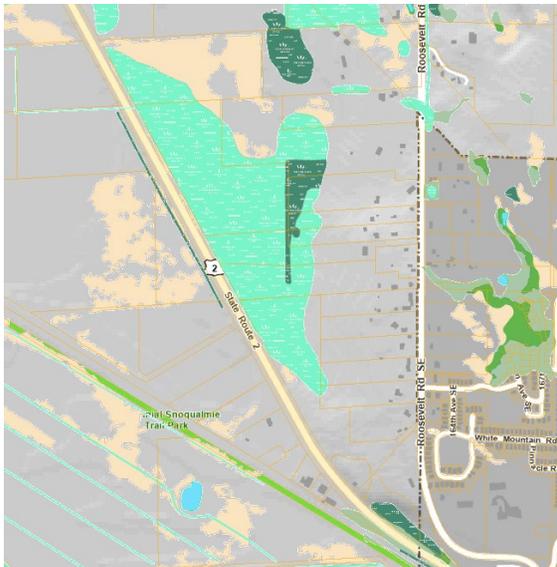
1. A large portion of the County Council Motion 22-099 UGA expansion area is within an open space agriculture tract.

Property Characteristics	
Use Code	830 Open Space Agriculture RCW 84.34
Unit of Measure	Acre(s)
Size (gross)	20.93



2. A portion of the proposed County Council Motion 22-099 UGA expansion area is identified as having critical areas including wetlands, flood plain based and priority habitat for anadromous fish:

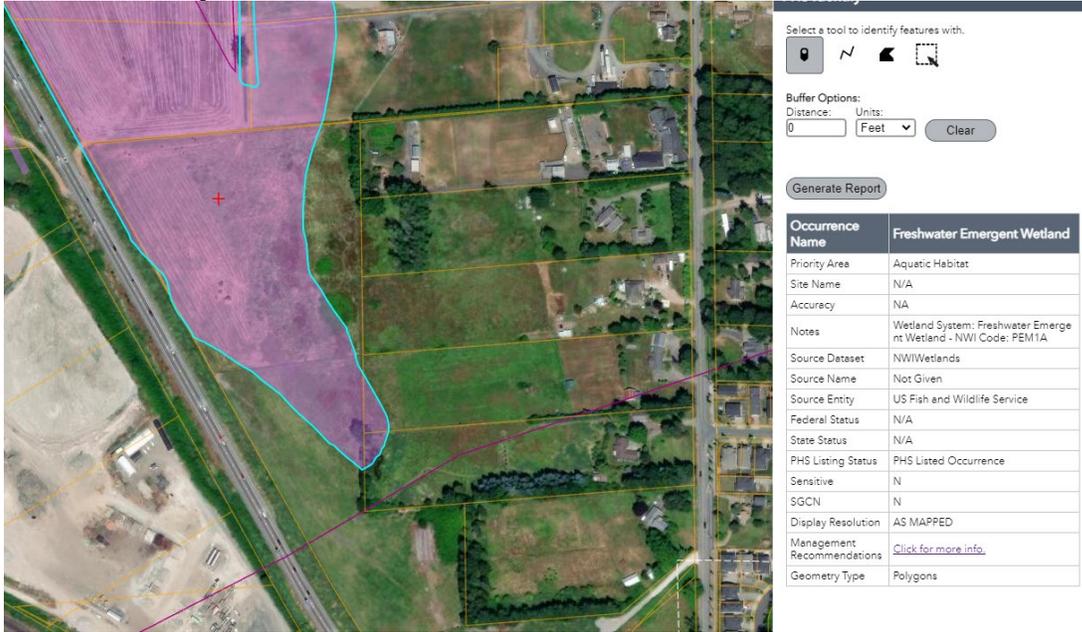
Wetlands:



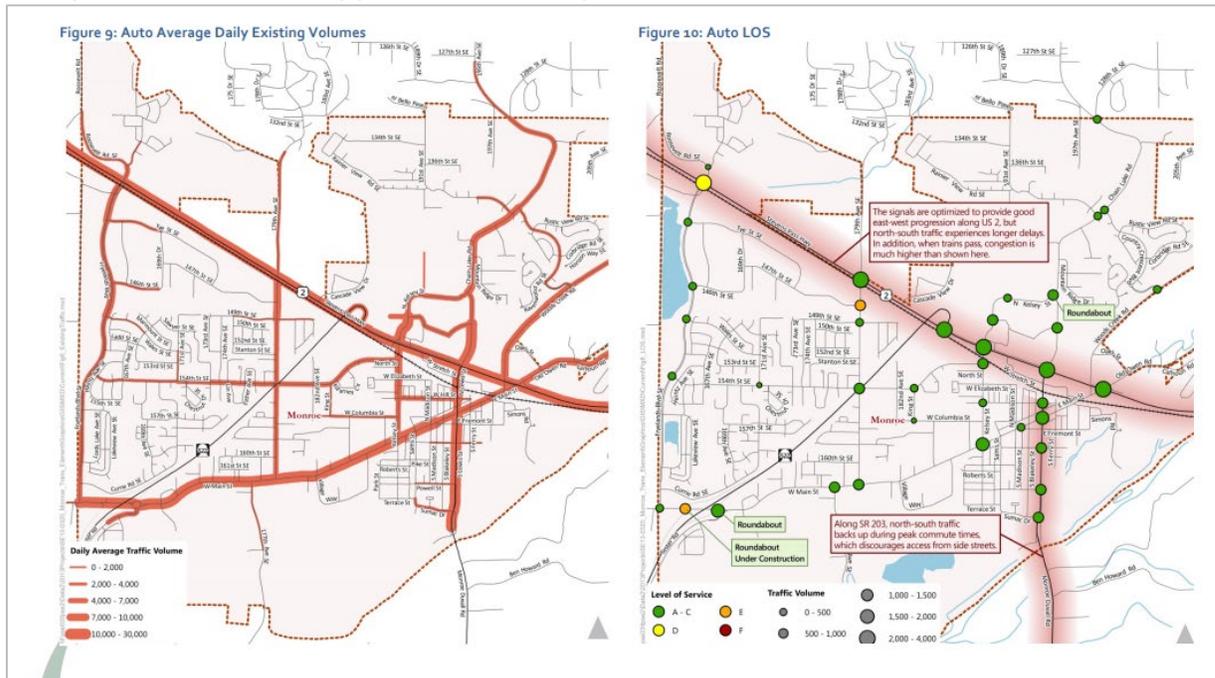
Flood Plain:



WDFW Priority Habitat:



- There are existing transportation issues that were not included in the DEIS analysis relating the County Council Motion 22-099, but included in the City of Monroe 2015-2035 Comprehensive Plan, Appendix D, Transportation Plan:



Although not supported by the City, if the County Council chooses to proceed with this UGA expansion, the City request the existing FLUM designation and zoning remain in place. Any increase in density should occur at time of annexation, consistent with the City’s own vision for its growth and development.

MON2 (Davis-Johnson)

The City of Monroe supports the MON2 (Davis-Johnson) Monroe UGA expansion, which was formalized by a 6-1 vote of the City Council on April 25, 2024. This support is based on comments provided by the Davis's during the Public Comment portion of the meeting (comments attached), and the future need for diverse housing within the City of Monroe. The Davis's stated they are willing property owners desiring to annex into the City of Monroe and develop the property at higher residential densities that would help create more diverse housing options for residents with varying income levels in Monroe.

The City Council's support is based on the following conclusions:

- The public comments provided by the Davis's during the City Council meeting on April 25, 2024, including those comments summarized above.
- The 22 acres included in the MON2 proposal are currently surrounded on three sides by the City of Monroe.
- The inclusion of these parcels would allow additional critical connections between the recent residential developments between 191st Street and Chain Lake Road, allowing access to parkland to the west and the multimodal trail along Chain Lake Road.
- The area within the UGA expansion, subsequent to annexation, could be developed with a variety of housing types, specifically middle housing options, and at a variety of price points to help the City comply with the new GMA housing requirements.
- Upon annexation, an extension of the existing Chain Lake Road multi-modal trail across the subject property north towards Chain Lake Elementary School could be completed.

If the County Council chooses to approve the MON2 UGA proposal, the Mayor and City Council request the land use designation and associated zoning not change until the City annexes the property.

City of Monroe Capital Facilities Correction Request

Finally, the City requests revisions to the narrative and map for the City of Monroe's wastewater system summary in the Draft Capital Facilities and Utilities Element. Although the City's adopted 2015 Sanitary Sewer boundary includes a small study area in the SW RUTA, the boundary is being retracted to the UGA for consistency with GMA during this comprehensive plan update cycle. Please update the City of Monroe wastewater system summary in Tale CUE 3-6 on page CUE-130, and the Public Wastewater Systems Map CUE WW Map 1 on page CUE-134, accordingly.

Thank you for considering the City of Monroe's requests and comments.



Geoffrey Thomas
Mayor
City of Monroe, WA