

PLANNING COMMISSION MEETING AGENDA



City of Lake Stevens Vision Statement

We are a thriving community that promotes a vibrant economy, preserves natural beauty, and supports an exceptional quality of life for all.

September 18, 2024 - 6:00 PM

Hybrid - Via Zoom or at the Mill

Join Zoom Meeting: <https://us02web.zoom.us/j/88264115410>

or call in at: 253-215-8782 Meeting ID: 819 0736 0668

- 1. Call to Order**
- 2. Roll Call**
- 3. Guest Business**
- 4. Action Items**
 - A. August 19, 2024 Meeting Minutes Dawn Erickson
- 5. Discussion Items**
 - A. 2024 Comprehensive Plan Update David Levitan
 - B. Q3 2024 Department Report and Work Plan Update Russ Wright
- 6. Commissioner Report**
- 7. Planning Director's Report**
- 8. Adjourn**

THE PUBLIC IS INVITED TO ATTEND

The City of Lake Stevens strives to provide accessible opportunities for individuals with disabilities. Please contact Human Resources, City of Lake Stevens ADA Coordinator, (425) 622-9400, at least five business days prior to any City meeting or event if any accommodations are needed. For TDD users, please use the state's toll-free relay service, (800) 833-6384, and ask the operator to dial the City of Lake Stevens City Hall number.

PLANNING COMMISSION STAFF REPORT



Agenda Date: 9/18/2024

Subject: August 19, 2024 Meeting Minutes

Contact Person/Department: Dawn Erickson, Community Development

Budget Impact:

Legal Review: No

RECOMMENDATION(S)/ACTION REQUESTED:

SUMMARY/BACKGROUND:

APPLICABLE CITY POLICIES:

ATTACHMENTS:

None

PLANNING COMMISSION STAFF REPORT



Agenda Date: 9/18/2024

Subject: 2024 Comprehensive Plan Update

Contact Person/Department: David Levitan, Community Development

Budget Impact:

Legal Review: No

RECOMMENDATION(S)/ACTION REQUESTED:

No action is required. Staff will provide an update on the draft 2024 Comprehensive Plan, which was issued for agency and public review on July 26, 2024 and reviewed by the Planning Commission at their August 19, 2024 meeting. The Planning Commission is scheduled to review the plan and make a recommendation to City Council at their October 2, 2024 meeting.

SUMMARY/BACKGROUND:

On July 26, 2024, the city issued a draft of its 2024 Comprehensive Plan and potential zoning map amendments. These documents were posted to the [project website](#), distributed to interested parties, and posted to the city's social media channels, with an opportunity for the public to provide public feedback. The Planning Commission held a work session on [August 19, 2024](#) to review the draft plan and invite the public to provide oral testimony in advance of their upcoming public hearing. No members of the public attended or provided public comment at the meeting.

Commissioners provided feedback on several goals and policies and other components of the plan, which will be reflected in the public hearing draft. Staff also reviewed the draft plan with the City Council at their [September 3, 2024 meeting](#), which focused primarily on housing and infrastructure issues.

To date, the city has received comments from four members of the public (Attachment 1) and six agencies (Attachment 2; summarized below). The Department of Commerce has provided a draft analysis of Growth Management Act (GMA) compliance, and staff

is anticipating their official comment letter prior to the end of the 60-day agency review period on September 25, which will be provided in the October 2 public hearing packet. Staff is currently finalizing revisions to the plan in response to the public, agency, Planning Commission, and City Council comments, which will be reflected in the public hearing draft issued later in September, along with the SEPA threshold determination for the proposal. The six agencies that submitted public comments are as follows:

- The Puget Sound Partnership’s Ecosystem Coordination Board (ECB), whose comments were focused on opportunities to strengthen policy language related to salmon and Puget Sound recovery.
- The Washington State Department of Transportation (WSDOT), whose comments focused on “Complete Streets” and identified additional agency resources for comprehensive plan implementation.
- The Department of Natural Resources (DNR), whose comments focused on geologically hazardous areas, mineral resource lands (N/A in Lake Stevens), climate change, and natural hazard mitigation planning.
- The Washington Department of Fish and Wildlife (WDFW), who submitted a detailed comment letter recommending additional policy language regarding regional watershed coordination, discussion of climate change impacts, protection and enhancement of wildlife corridors, shoreline management, and critical areas protection.
- The Puget Sound Regional Council (PSRC), which reviewed the plan utilizing their Vision 2050 Consistency Tool and commented on the city’s land use assumptions, land capacity analysis across different land use and zoning categories, analysis and mapping of natural hazards, assessment of climate change impacts on vulnerable populations, and regional collaboration on meeting greenhouse gas emissions targets.
- The Washington State Department of Commerce (Commerce), which like PSRC also asked for additional documentation on the city’s land capacity analysis and housing needs analysis at each income band and corresponding zoning and included a detailed checklist on the plan’s compliance with the GMA, with a special focus on climate change adaptation and mitigation (including for vulnerable populations), displacement risks for existing residents and businesses, racially disparate impacts, and equity and environmental justice.

At their August 19 meeting, commissioners asked several questions regarding public noticing for the proposed land use and zoning map amendments, as they sought to ensure that affected and surrounding property owners had adequate notice of and context for the proposed changes. Staff discussed its work on a web-based “StoryMap”, which combines a map of the proposed map amendments with background narrative and other information to better explain the reasoning behind the proposed map amendments.

On September 13, staff issued public notice of the proposed map amendments via mailed postcards (Attachment 3; sent to affected property owners and those within 300 feet), email, newspaper, the project website, and land use notice signs posted around the perimeter of each proposed map amendment area. The notices include a [website link](#) and QR code to the StoryMap, which allows users to scroll through each individual map amendment and learn more about why they are being considered. Staff anticipates receiving a larger influx of public comments on the proposed map amendments and policy document following the latest round of public notice, and will provide a summary of recent comments at the September 18 meeting.

Since the draft map amendments were produced and distributed for public review, staff has proposed eliminating several map amendments that do not have the potential to increase the supply of multifamily housing affordable to households between 0 and 80% of area median income (AMI, which is currently \$150,400 for a family of four); for example, map amendments and associated rezones from R4 to R6 or R6 to R8-12. The city's growth targets and land capacity analysis show that the city already has sufficient zoned capacity to meet its 2044 growth targets for detached single family homes and middle housing such as duplexes, triplexes, and townhomes that are affordable to households above 80% AMI. The updated list of map amendments is reflected in the StoryMap link above.

Next Steps

As noted above, the Planning Commission's public hearing to make a recommendation to City Council is scheduled for October 2, 2024, with the City Council scheduled to take action on that recommendation following their own public hearing later in October 2024. Staff is continuing to update the draft plan based on comments provided by the public, agencies, tribes, and other community partners, which will be followed by:

- Issuance of the State Environmental Policy Act (SEPA) threshold determination for the proposal;
- The Planning Commission's October 2 public hearing, where it will evaluate the updated draft plan and consistency with the comprehensive plan and zoning map amendment criteria in LSMC 14.16C.040, LSMC 14.16C.090, and Chapter 1 of the existing Comprehensive Plan.
- The City Council's October 22 public hearing, where it will consider the Planning Commission's recommendation.

APPLICABLE CITY POLICIES:

ATTACHMENTS:

1. Attachment 1 - Public Comments
2. Attachment 2 - Agency Comments

3. Attachment 3 - Public Notice Postcard

David Levitan

From: KM Courter <courter.kristin@gmail.com>
Sent: Sunday, August 25, 2024 9:23 PM
To: David Levitan; jon courter
Subject: Request for Rezoning Parcel 00775500003600
Attachments: Lake Stevens 9119 20th Street SE Public-Comment-Survey-Form.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

August 25, 2024

RE: Parcel 00775500003600
9119 20th Street SE

Mr. Levitan,

The Comprehensive Plan is quite comprehensive!

Per our last meeting, here is our formal request for rezoning of the property noted above. We respectfully request consideration of a higher density designation. We believe the goals of subsection 3.1.5 on page 94 apply to our property because we are on 20th Street SE a major arterial, commercial zoning including Costco is across the street, and there is a bus stop on the corner to encourage use of public transportation. It seems this property checks all the boxes and is in need of an upgraded zoning.

Thank you for your consideration. We look forward to the next steps.

Jon and Kristin Courter

jonjcourter1@gmail.com
425-418-8777

David Levitan

From: Mark Levin <mark@knivesmatter.com>
Sent: Tuesday, August 27, 2024 9:08 AM
To: David Levitan
Subject: Re: rezone parcel id 00604800000300

You don't often get email from mark@knivesmatter.com. [Learn why this is important](#)

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Hello David!

I just checked the potential rezone map and see that the abovementioned parcel and surrounding area may be up zoned from r4 to r6.

We are under a contract to develop the property and still planing to rezone to 8-12 as the adjacent parcels are to the east and as all the southern region is being proposed to the same zoning.

Are we still ok to apply for the rezone, or now the city won't support it because of the planned r6 zoning? We did run a few exercise models and proforma, unfortunately only developing the area with townhomes makes sense in financial terms due to the wide PSE powerline easement which devices our property into 2 pieces making it challenging to access the eastern half. In addition, the property has one of the major sewer lines which limits our road placement to the south of the property, along the property line.

We looked into cottage development, but Lake Stevens cottage standard are dated and don't help the situation.

So we really hope that rezone to 8-12 is still the option we could take.

Best,
Mark

David Levitan

From: Janice Thompson <jtlakestevens@gmail.com>
Sent: Thursday, September 5, 2024 11:42 AM
To: David Levitan
Subject: 2024 Draft Comp. Plan questions

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Mr. Levitan, I'm was wondering if the City hired a consultant for the Comp. Plan and if so who?

Did the City meet or not meet all of the last Comp. Plans goals? What are those?

My biggest concern is how you plan to address traffic? Are we in the red for providing transportation improvements under the last plan?

I was looking for where roads will be widened, park and ride lots, and transit bus stop pullouts. If they are not convenient to high density housing, especially affordable housing which is where it should be. What will the LOS on our roads be? And what are the cost associated with it as well as maintenance, Capital facilities and who's paying for it? We already have a lot of roads that need restriping.

We have a lot of roads that get people and emergency personnel to and from work and hospitals that are beyond your control. That doesn't mean you should minimize it by saying "well that's beyond our control". Highway 9,204,92 not to mention I-5. Machias Rd. backs up trying to get onto 92 and then there's the short turn lane from 92 to get onto Machias heading west. All of you know the problems. And the trestle that you should know by now will be "in the mud" per Sno. Co DEM. from a good earthquake. If anyone thinks the 530 slide is our biggest disaster they should consider that impact and the fact you all knew the consequences. There should be some liability on your part.

Does the plan cover salaries? How understaffed are we now? Especially including the police department and the associated equipment we need as the city has grown.

Lastly as a taxpayer I also consider the expansion of schools, fire protection and sewer. Please do not put us in the position that the city of Everett is in right now. I don't believe the Comp. Plan should be a vision. We need a solid plan. There shouldn't be anymore growth or expansion of the UGA until the State and Fed's provide adequate and safe roads and the City can show us they can widen our arterial roads around Lake Stevens.

Sincerely

Janice Thompson

David Levitan

From: sallyjosebring <sallyjosebring@frontier.com>
Sent: Tuesday, September 10, 2024 1:51 PM
To: David Levitan
Subject: Comp Plan comment

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Hello Senior Planner Levitan,

This will probably seem pretty minor to you, but I noticed something that seemed strange in the part of the Comp Plan that I read before last week's meeting.

I saw the "I Love Lake" logo on page 24 of the staff report. It could well have been there from a previous comp plan before you were involved, but it doesn't make sense.

"I Love Lake" is a specific campaign that "promotes the positive actions homeowners can take to prevent algal blooms." <https://lakestevenswa.gov/535/I-Love-Lake-Campaign> Since this was logo was found in an early part of the Comp Plan in a section that had nothing to do with lake quality or stormwater, it does not make sense. My guess is that whoever put it there thought it was a cool logo celebrating the city, but that is not what is about. I would encourage you to remove this logo from the Comp Plan.

Thank you,
Sally Jo Sebring

David Levitan

From: Sears, Tricia (DNR) <Tricia.Sears@dnr.wa.gov>
Sent: Wednesday, July 31, 2024 2:21 PM
To: David Levitan
Cc: Sears, Tricia (DNR); Aken, Jeff (COM)
Subject: Lake Steven's Comprehensive Plan Periodic Update (Commerce ID# 2024-S-7290): WGS comments

You don't often get email from tricia.sears@dnr.wa.gov. [Learn why this is important](#)

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7/31/24

Hello David,

In keeping with the interagency correspondence principles, I am providing you with comments on Lake Steven's Comprehensive Plan Periodic Update (Commerce ID# 2024-S-7290).

For this proposal submitted via Planview, I looked at the proposal and focused on areas related to WGS work. Of note, but not limited to, I look for language around the geologically hazardous areas, mineral resource lands, mining climate change, and natural hazards mitigation plans.

Specifically in this proposal, I reviewed the Comprehensive Draft Plan and the Potential Zoning Changes Map. Below, I include several comments and suggestions.

Page 113 in the Comprehensive Plan states "The city is required to update its CAO by December 31, 2025, which will be done as an implementation task for the 2024 periodic update to this plan. As part of the CAO update, the city will incorporate updated BAS for wetlands, streams and other critical areas." Is there a description of what is the new BAS and how it is incorporated into the Comprehensive Plan?

Page 106 Geology and Soils and page 115 Geologically Hazardous Areas are very brief descriptions, especially compared to the other critical areas. Are there only steep slopes as geologic hazards for Lake Stevens? The Critical Areas map in Figure 4-3 only shows steep slopes for geologically hazardous areas. Suggest a bit more detail in these provisions.

On page 220, in 7.9.12, it mentions mitigation strategies. Suggest adding a policy that specifically mentions and connects the comprehensive plan with the hazard mitigation plan and other plans that Lake Stevens has. There is no mention of the hazard mitigation plan in the comprehensive plan.

There is mention of natural resource lands in two places. There is mention of agriculture and forestry, but no mention of mineral resources.

Recognizing the limitations of the current proposals, I want to mention that it would be great for you to consider these in future work, be it in your comprehensive plan, development code, and SMP updates, and in your work in general:

- Consider adding a reference to WAC 365-190-120 geologically hazardous areas for definitions in other areas besides the CAO. In addition, consider adding a reference to WAC 365-196-480 for natural resource lands.

- Consider adding a reference to the WGS Geologic Information Portal in other areas besides the CAO. If you have not checked our interactive database, the WGS Geologic Information Portal, lately, you may wish to do so. [Geologic Information Portal | WA - DNR](#)
- If you have not checked out our Geologic Planning page, you may wish to do so. [Geologic Planning | WA - DNR](#)

Thank you for considering our comments. If you have any questions or need additional information, please contact me. For your convenience, if there are no concerns or follow-up discussion, you may consider these comments to be final as of the 60-day comment deadline of 9/24/24.

Cheerio,
Tricia

Tricia R. Sears (she/her/hers)

Geologic Planning Liaison

Washington Geological Survey (WGS)

Washington Department of Natural Resources (DNR)

Cell: 360-628-2867 | Email: tricia.sears@dnr.wa.gov

August 14, 2024

Russ Wright
Community Development Director
City of Lake Stevens
P.O. Box 257
Lake Stevens, WA 98258

RE: CRITICAL AREAS ORDINANCE and/or COMPREHENSIVE PLAN PERIODIC UPDATE

Dear Russ Wright,

On behalf of the Puget Sound Partnership's (PSP) Ecosystem Coordination Board (ECB), we submit this letter with respect to your jurisdiction's current periodic update process, and associated updates to development regulations. The Puget Sound Partnership's Ecosystem Coordination Board supports the Leadership Council in carrying out its duties, including the development and implementation of the [Action Agenda](#). The ECB is made up of 33 members, representing local, state, federal, and tribal governments, environmental and business interests. This broad representation supports the ECB to provide cross-caucus reporting and dialogue on priority issues, such as how to ensure the protection and restoration of habitat for ecologically sustainable watersheds for the future of all species through local periodic updates. This letter provides background on the priorities described in the Action Agenda and the resources available to support Comprehensive Plans and Critical Areas Ordinances to align with those priorities. While this letter does not respond to materials produced as part of your comprehensive plan update, it does offer many specific recommendations and resources that we believe will support the protection and recovery of the Puget Sound.

The recovery of Puget Sound is vital to human wellbeing in the region, to sustain threatened salmon, orcas, and numerous other species, and to preserve Puget Sound's ecosystem functions and values for current and future generations. But the Puget Sound ecosystem is under increasing threats from the development of ecologically important habitats, forests, farmlands, and other working lands, especially outside of urban growth areas. The [smart growth strategy](#) in the [2022-2026 Action Agenda](#) identifies a key opportunity to "improve the implementation of the Growth Management Act within local jurisdictions land use planning and decisions, and across jurisdictions to include the protection of natural areas and working lands."

New planning requirements, updated science, and learning from the past ~8 years of Growth Management Act (GMA) implementation make this round of Comprehensive Plan updates a critical juncture and inspiring opportunity in our region's collective work to recover Puget Sound. As you know, the Comprehensive Plan sets the stage for development activities and decisions which all have an impact on how well we achieve our goals to protect and restore Puget Sound. To support recovery of the Puget Sound, we recommend

that jurisdictions in the Puget Sound region make use of the many science-based resources available to support development of Comprehensive Plan and Critical Area Ordinance (CAO) amendments that protect natural areas and working lands.

Our collective understanding of the complex relationships between land cover, development, and ecosystem health improves over time, and this is why cities and counties must include current, best available science and information in their local land use planning amendments during the periodic update. Fortunately, our state Departments of Fish and Wildlife, Ecology, Natural Resources, and Commerce have been busy updating and distributing science-based guidance to support local governments in this process. Cities and counties should leverage these resources below, and other science-based resources, to effectively amend their Comprehensive Plans and Critical Areas Ordinances:

- [Local Integrating Organizations \(LIOs\) and LIO Ecosystem Recovery Plans](#)
- [Local Salmon Recovery Watershed Chapters](#)
- [Department of Fish and Wildlife's current Priority Habitats and Species information](#)
 - [Riparian Management Zone Checklist for Critical Areas Ordinances](#)
- [Ecology's Wetland Guidance for Critical Areas Ordinance \(CAO\) Updates](#)
- [Ecology's Climate Resilience and Shoreline Management webpage](#)
- Commerce's Critical Areas [Handbook](#) and [Checklist](#)

To ensure smart growth in the Puget Sound region, the ECB recommends that jurisdictions consider and take action on the following:

- 1) **At key points in the Comprehensive Plan update process, review and apply the [Sound Choices Implementation Checklist](#).** The checklist was developed by the Puget Sound recovery community and is intended to help local jurisdictions make updates to their comprehensive plans that align with Puget Sound recovery strategies and actions.
- 2) **Ensure your local planning department takes advantage of funding for additional staff resources to incorporate salmon and Puget Sound recovery into local planning by applying for the [Salmon Recovery through Local Planning Grant Program](#).** Depending on funding availability, Washington State Department of Commerce will hold a fall 2024 round of funding. For more information contact angela.sanfilippo@commerce.wa.gov.
- 3) **Understand how your local land use decisions will support region-wide efforts to achieve positive trends in [Regional Land Use Indicators](#).** The Puget Sound Partnership assesses the status and trends of threats through a set of regional land use indicators.
- 4) **Reach out to and involve local experts in Puget Sound recovery** including Local Integrating Organization members, Salmon Recovery Lead Entities, as well as your [local representative](#) on the [Ecosystem Coordination Board](#). For additional support in facilitating connections with these local experts please reach out to Laura.Rivas@psp.wa.gov.

As you help shape the future of the City of Lake Stevens at this pivotal moment in time, the ECB requests that you take advantage of the valuable tools and resources included in this letter to ensure we are doing all we can to support our local communities and Puget Sound recovery. Thank you for considering our recommendations, tools, and resources.

Sincerely,



Julie Watson, Chair

Cc:

Bill Dewey, co-Vice Chair Ecosystem Coordination Board

Ellen Southard, co-Vice Chair Ecosystem Coordination Board

Dave Somers, Snohomish County Executive, Snohomish-Stillaguamish LIO representative

Gregg Farris, Snohomish County Surface Water Management Director

Kathleen Pozarycki, Snohomish-Stillaguamish LIO Coordinator

August 12, 2024

City Hall
PO Box 257
Lake Stevens, WA 98258

Dear Mr. Levitan,

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to review and comment on the City of Lake Stevens draft Comprehensive Plan. Please find our comments on these planning efforts below.

WSDOT appreciates the challenge cities face in planning for growth, diversifying their economic base and transitioning to a multimodal paradigm that prioritizes the mobility of persons over the mobility of single occupancy vehicles. We applaud City of Lake Stevens' policy 2.13.7 to "Develop high quality, compact urban communities throughout the region's urban growth area that impart a sense of place, preserve local character, provide for mixed uses and choices in housing types, and encourage walking, bicycling, and transit use." This approach will allow the city to better accommodate housing and job growth using available infrastructure and resources, while gaining the maximum possible benefit from new investments.

In 2022, the Washington State Legislature passed [Senate Bill 5974](#), the Move Ahead Washington package. The bill directs WSDOT to incorporate the principles of Complete Streets in most state transportation projects. More information, including staff contacts, can be found on WSDOT's [Complete Streets](#) webpage. As WSDOT projects in the Lake Stevens area advance into the design phase, we look forward to working with the city on our shared goal of a complete active transportation network across city and state facilities.

WSDOT's comprehensive planning resources for local agencies can be found on our [Land Use and Transportation Guidance](#) page. This includes a wealth of information on how WSDOT reviews local agency plans, our land use and transportation goals, best practices in building transportation efficient communities, and pertinent concurrency and SEPA guidance. WSDOT's [Community Planning Portal](#) may be particularly helpful for local jurisdictions. The portal includes data on the state transportation system often needed to complete the transportation element inventory required by the Growth Management Act. In addition to the data included in the portal, local planners can add their own data to ArcGIS Online and create custom reports.

WSDOT appreciates being included in Lakes Stevens' planning process. Please reach out if you would like to discuss opportunities for ongoing engagement and coordination, as well as technical assistance available during your work updating your plans. Thank you again for the opportunity to review the Lake Stevens Comprehensive Plan. We look forward to our continuing productive partnership.

Sincerely,

Jeff Storrar, WSDOT Management of Mobility Policy Manager
CC: Matthew Kenna, WSDOT Management of Mobility



State of Washington

Department of Fish and Wildlife, Region 4

Region 4 information: 16018 Mill Creek Blvd, Mill Creek, WA 98012 | phone: (425)-775-1311

August 23, 2024

David Levitan, Senior Planner
Planning and Community Development
1812 Main Street | PO Box 257
Lake Stevens, WA 98258
Dlevitan@lakestevenswa.gov

RE: Case number 2022-C-328, WDFW comments for Lake Stevens' draft Comprehensive Plan

Dear Mr. Levitan,

On behalf of the Washington Department of Fish and Wildlife (WDFW), thank you for the opportunity to comment on Lake Stevens' draft Comprehensive Plan as part of the current periodic update. Within the State of Washington's land use decision-making framework, WDFW is considered a technical advisor for the habitat needs of fish and wildlife and routinely provides input into the implications of land use decisions. We provide these comments and recommendations in keeping with our legislative mandate to preserve, protect, and perpetuate fish and wildlife and their habitats for the benefit of future generations – a mission we can only accomplish in partnership with local jurisdictions.

Table 1. Recommended changes to proposed policy language.

Policy Number	Policy Language (with WDFW suggestions in red)	WDFW Comment
Land Use		
2.3.1 Page 2-31	Review development standards and regulations to ensure that they possess an appropriate level of flexibility to promote efficient use of buildable lands, balanced with the need for predictable decision-making and environmental protection.	We suggest this edit to highlight the need for flexibility within developmental regulations to address environmental protection standards. Some examples of development standards that incorporate this include: • Flexible subdivision design, such as cluster development or conservation subdivisions. • Flexibility in lot size and configuration, including on-site density transfers to

		accommodate habitat patches and corridors. More examples can be found in WDFW's Landscape Planning for Washington's Wildlife.
2.3.5 Page 2-32	Ensure that subdivisions are pedestrian friendly and include ample street trees, adequate sidewalks, open spaces, parks, walkways and paths connecting neighborhoods and surrounding uses	Open spaces should be designated, protected, and connected. We propose that along with requiring open space set-asides with parameters based on development type, site plans should demonstrate active efforts to connect these open spaces with others in the surrounding area. This open space connection could serve pedestrian opportunities and habitat connectivity simultaneously. Additionally, open spaces are climate-resilient assets that can serve as community spaces. All development within dense or populated areas should strive for open space retention, creation, and <i>connection</i> to benefit of people and the environment. This multi-purpose code upgrade would support policy 2.3.6, "Review Development and Design Guidelines for Multifamily Residential, Planned Residential Developments, Commercial and Mixed-Use development."
GOAL 2.7 Page 2-35	Coordinate Growth and Development with Adjacent Jurisdictions to Promote and Protect Interjurisdictional Interests.	We recommend adding a policy under this goal (2.7) that acknowledges the importance of watershed-wide coordination. Restoration, salmon recovery, and additional environmental protection cannot be accomplished without large-scale planning and coordination. For example, this policy could include: Protect and restore watershed-scale processes to maximize ecological benefits, ecosystem services, and climate resilience by coordinating with adjacent jurisdictions in the creation of the Lake Stevens Watershed Plan. This is especially pertinent, as Lake Stevens was recently awarded grant funds "to develop a basin-level watershed plan focused on salmonid habitat and water quality with language designed for integration into annual updates of the City's Comprehensive Plan," as stated on the city's website. We recommend highlighting this great work within this Comprehensive Plan update. For resources, see the WRIA 7 Watershed Restoration and Enhancement Plan, which outlines

		many potential (and possibly ongoing) projects within Lake Stevens (pages 57-58), as well as the Snohomish River Basin Salmon Conservation Plan . More documents can be found at the WRIA 7 salmon conservation and restoration website .
2.8.2 Page 2-36	It is the city's intent to annex the remainder of the Lake Stevens Urban Growth Area over the planning horizon to become one city, considering the following: e. To stabilize the development environment, striving to bring land use predictability to residents and property owners. This shall be accomplished by updating city maps to accurately illustrate the location of land use designations, critical areas, and other pertinent information.	We recommend Lake Stevens strive to update their critical area maps to accurately inform annexation decisions. Areas of high ecosystem value and function should be highlighted as areas to avoid for future development. These areas should be prioritized for protection into perpetuity. Resources to help address this goal include WDFW's Priority Habitats and Species (PHS) mapping information, found on our website (link).
2.8.3 Page 2-36	Annexations should serve to regularize city boundaries, and not divide lots. The intent is to ensure practical boundaries in which services can be provided in a logical, effective and efficient manner. This includes considering the bounds of natural features to inform areas subject to environmental change, such as floodplains and shorelines, that may present hazards to development.	We suggest also following the bounds of natural landscape features to avoid threats to citizen safety into the future.
2.9.6 Page 2-37	Protect, enhance, and preserve wetlands, riparian corridors, Shorelines of the State and open space corridors within and between urban growth areas useful for recreation, wildlife habitat, trails, and connection of critical areas, striving for net ecological gain.	We appreciate the inclusion of this policy. We also recommend including the intent to go above and beyond protection. No net loss standards are often insufficient in addressing watershed-wide degradation. As WDFW's Net Ecological Gain Standard Proviso Summary Report 2022 states, "...in the years since the introduction of NNL, Washington state has continued to face environmental degradation, indicating that the current NNL approach has been insufficient and that more rigorous standards, or more rigorous oversight of existing NNL requirements, are

		needed to adequately protect the state’s many important species and habitats.” We also encourage establishing a Monitoring and Adaptive Management program to track loss of critical areas. Please see the WA Department of Commerce’s Critical Area Handbook, specifically Chapter 7, Monitoring and Adaptive Management of Critical Areas. Tracking the accumulated loss of critical areas and striving for net ecological gain better aligns efforts to address no net loss requirements (WAC 365-196-830).
2.10.1 Page 2-37	Encourage New developments, redevelopments, and retrofit projects shall use low impact development (LID) techniques and natural drainage patterns where feasible and provide water quality treatment to contain storm water pollutants.	Lake Stevens is located in a uniquely important salmonid habitat area (see specific salmonid locations via WDFW’s SalmonScape). This underscores the distinctive role Lake Stevens plays in preserving, rehabilitating, and re-establishing salmon habitat. Especially in an urban setting such as Lake Stevens, LID can provide far-reaching support in addressing these goals. Policies within the Comprehensive Plan that support salmon recovery, such as those related to Low Impact Development (LID), are essential. Resources include U.S. Environmental Protection Agency - LID resources page as well as the Olympia Rain Garden Incentive Program, Puget Sound Green Stormwater Infrastructure Incentives Programs, Green Stormwater Infrastructure Assistance Programs Guidebook, and the Rain Garden Handbook for Western Washington. While these are generally small-scale projects, the cumulative impact of widespread implementation can be significant, especially with regard to watershed-wide salmon recovery goals.
2.10.2 Page 2-37	Encourage Require new developments to implement green infrastructure and LID “low impact development” techniques which can better manage stormwater and address increased storm intensities and stormwater runoff while providing cost savings in terms of land and improvements.	See resources and information in the above comment. As well as salmon recovery advantages, constructed wetlands and other green infrastructure projects planted with native trees and grasses can provide co-benefits that traditional gray infrastructure do not, including providing ecosystem services (pollution filtration), mitigating emissions (carbon sequestration), and creating recreational opportunities (seasonal trails and picnic spots).
2.11.1	Consider the potential impacts of climate change when developing	It is important to highlight the ecosystem services provided by natural resources. Protecting and

Page 2-38	plans and reviewing projects, including increased flooding and reduced air quality. In addition, carefully consider the ecosystem services and climate mitigation functions provided by critical areas in assessing these plans, especially if impact to these critical areas is proposed.	restoring natural assets is often more cost-effective than engineered solutions. See FEMA's guide Building Community Resilience with Nature-based Solutions , as well as software to track these resources from Natural Capital Project . Furthermore, see Kitsap County's approach to quantifying ecosystem services through their Kitsap Natural Resource Asset Management Project .
2.11.3 Page 2-38	Encourage energy-saving construction and building operation practices and the use of energy-conserving materials in all new construction and rehabilitation of buildings.	The Sustainable Development Code website is a great resource in outlining how to remove code barriers, create incentives, and fill regulatory gaps in pursuit of this policy's goals. See the city of Issaquah and the city of Bellevue's clean building incentive programs that aim to assist applicants reach state-required energy efficiency standards.
2.13.4 Page 2-39	Decrease dependence on the automobile by building good pedestrian and bicycle infrastructure, including sidewalks and bike paths that are safely removed from automobile traffic as well as good right of way laws and clear, easy-to-follow signage in proximity to homes, businesses, schools, churches and parks closer to each other so that people can more easily walk or bike between them. Concurrently, map and plan for wildlife movement to connect fragmented wildlife habitats, address wildlife collision concerns, and facilitate multi-beneficial redevelopment with pedestrian, bicycle, and wildlife movement in mind.	When considering redevelopment for pedestrian and bicycle movement, wildlife movement must also be considered. We suggest including the adjacent addition in order to avoid an increase in safety concerns as it relates to wildlife collisions and additional wildlife conflict situations, as well as to facilitate habitat corridor linkages. To accomplish this goal, we suggest Lake Stevens: - Create a list of potential high-collision areas, taking note of all wildlife (including smaller animals such as frogs). - Employ wide bridges instead of culverts to facilitate wildlife passage under roads (which could also facilitate pedestrian and bicycle movement). - Increase the width and vegetation in right-of-way areas adjacent to pedestrian or recreational trail areas. As population densities increase, it is crucial to plan for wildlife movement now in order to avoid major conflict in the future, especially in rural areas near urban areas or in areas slated for future growth. For additional resources, see The Washington Wildlife Habitat Connectivity Working Group, WSDOT's Reducing the Risk of Wildlife Collisions

		website as well as Wildlife Habitat Connectivity Consideration in Fish Barrier Removal Projects , Montana Fish, Wildlife, and Parks' How to Build Fence with Wildlife in Mind , and WDFW's website .
Housing		
3.3.2 Page 3-25	Encourage planned residential developments and other development concepts that allow flexibility in lot sizes, setbacks and other development standards in exchange for community benefits such as protecting natural resources and features and providing affordable housing options.	We appreciate this policy and look forward to seeing further implementation of these goals via code updates.
3.5.3 Page 3-28	Ensure that new development is consistent with citywide and applicable neighborhood goals and policies, including but not limited to, sustainable site standards, landscaping requirements, building design guidelines, and affordability, site selection that considers future climate-related hazards, and connected recreational trail opportunities that also serve as wildlife movement corridors to ensure new and existing neighborhoods are attractive and safe places to live.	See comments in relation to 2.3.5 and 2.13.4 above.
3.5.7 Page 3-28	Encourage Require, to the greatest extent feasible, the development of efficient and environmentally sensitive housing practices to minimize impacts to infrastructure and natural resources and to address state energy efficiency, carbon reduction, and salmon recovery goals.	We suggest requiring these standards to the greatest extent feasible in order to meet salmon recovery (RCW 36.70A.172), energy efficiency , and other state requirements.

Environmental and Natural Resources		
4.1.2 Page 4-19	Promote the retention of significant trees during development, especially near riparian areas , recognizing their value for stormwater management and water quality, oxygen production and carbon sequestration.	Lake Stevens' Climate Sustainability Plan often states the need to protect and restore the city's tree canopy. We recommend Lake Stevens strive to create a tree canopy assessment, followed by a tree canopy plan in order to assess trends, set goals, and measure progress towards those goals. This plan should also measure how well the City's tree-related ordinances are functioning in retaining trees on the landscape. It may not be enough to rely on ordinances if there is not a system in place to track cumulative impacts over time. This plan could help the city pursue the adjacent policy's goals, including increasing property values, reducing stormwater runoff and erosion, improving air quality, and reducing energy used for heating and cooling. Resources: • City of Tacoma is a great resource for exploring how tree canopy plans can become a community effort, how data can be presented, and how to track canopy loss/gain. • Data resources include the USDA website, WDFW's change detection tree canopy data, the Puget Sound Washington Urban Canopy Project, and WA DNR website. • Example ordinances and plans can be found on the MRSC website. • Funding resources can be found on the DNR website (Commissioner Franz Announces \$8 Million in Urban Forestry Grants). • Discover the value of the benefits provided by individual trees around your home and in your community with the National Tree Benefit Calculator. Additionally, streams shaded by trees offer salmonid refugia from increased summer temperatures that are becoming more frequent. This is specifically important for areas in Lake Stevens near the Little Pilchuck Creek and Catherine Creek, which are generally warm and commonly exceed temperature criteria (Swanson et al. 2012; Snohomish County and SLS Executive

		Committee 2018, Water Temperature Conditions in the Snohomish River Basin).
4.1.4 Page 4-19	Protect streams and natural drainage ways and associated buffers from adverse impacts of land development in order to maintain the stream flow regime necessary for continued life cycle activities, preserve associated riparian habitat, avoid unnatural bank or bed erosion and increased turbidity, foster resiliency to climate change, pursue wildlife habitat corridor connectivity , and improve water quality.	We appreciate the adjacent policy and suggest incorporating Riparian Management Zones (RMZs) to help achieve this goal. RMZs should be designated and protected as a critical area and replace outdated ‘stream buffer’ terminology. These areas “are disproportionately important, relative to area, for aquatic species (e.g., salmon) and terrestrial wildlife,” as stated in WDFW’s Riparian Ecosystems, Volume 2: Management Recommendations and supported by WDFW’s BAS which highlights key ecosystem service benefits RMZs provide. Please see WDFW’s checklist to compare Lake Stevens’ current Critical Areas Ordinance to agency priorities.
4.1.6 Page 4-19	Promote and encourage Require, to the greatest extent feasible , sustainable development through efficient land use, green building design, flexibility of site design (Low Impact Development, cluster development) and water conservation and water quality protection.	We suggest this edit in order to express this policy’s goals in actionable terms. As Lake Stevens’ Climate Sustainability Plan points out, “Amidst the population increase, the lake remains the focal point of the greater Lake Stevens community for recreation and is a symbol of the community’s need to provide for a more sustainable existence that will protect their natural environment.”
4.1.9 Page 4-20	Use best management practices and educational outreach to ensure protection of water resources before , during, and after construction, including bank stabilization techniques, site design, construction timing and practices, use of bio-engineering and current erosion and drainage control methods as defined in the current Stormwater Management Manual of Western Washington.	We suggest the use of soft shore armoring of shorelines as a first choice to control erosion. We also suggest the promotion of educational efforts like Shore Friendly to new shoreline property owners with the goal of informing best management practices to avoid uninformed alterations to the shoreline.
4.1.13 Page 4-20	Promote the detention and treatment of stormwater and encourage innovative methods for regional stormwater facilities, green infrastructure, stormwater parks, and advanced treatment for emerging contaminants to	Resources related to the adjacent policy include U.S. Environmental Protection Agency - LID resources page as well as the Olympia Rain Garden Incentive Program , Puget Sound Green Stormwater Infrastructure Incentives Programs , Green Stormwater Infrastructure Assistance

	maintain hydrological functions and water quality within ecosystems and watersheds.	Programs Guidebook , and the Rain Garden Handbook for Western Washington . While these are generally small-scale projects, the cumulative impact of widespread implementation can be significant, especially with regard to watershed-wide salmon recovery goals.
4.1.16 Page 4-20	Coordinate with adjacent jurisdictions and local tribes on the protection of natural resources, expanding the scope to include consideration for watershed-wide processes that require cross-jurisdictional coordination.	We recommend framing the protection and preservation of natural resources in a larger context, as watershed-wide salmon recovery, climate change mitigation, and related endeavors require cross-jurisdictional coordination. To find more information, contact your local Lead Entity representatives (link).
4.2.6 Page 4-21	Acquire land for permanent public access to the water and protect open space as consistent with the adopted Shoreline Master Program and Critical Area Ordinance.	We recommend following the guidance of the CAO in the Comprehensive plan to ensure no net loss requirements are met (WAC 365-196-830).
New Policy 4.2	Require proposed bulkhead rebuild projects to evaluate the effectiveness of alternative designs (e.g., structure relocations and soft-shore approaches) as opposed to in-kind replacement.	We recommend stating the need for alternative designs when considering bulkhead replacement and making soft shore armoring the preferred choice.
New Policy 4.2	Designate natural shoreline buffers that maintain native riparian vegetation and encourage the restoration of riparian vegetation. When removal cannot be avoided, require mitigation that addresses cumulative impacts and requires replanting.	We recommend encouraging the growth and preservation of riparian management zones. See details in comments given for 4.1.4 above.
New Policy 4.2	Designate natural shoreline buffers of a width based on the best available science to protect salmonid habitat processes and functions.	We recommend using BAS to protect critical habitat. See details in comments given for 4.1.4 above.
4.3.3 Page 4-22	Identify and protect wildlife corridors and improve habitat connectivity both inside and outside the UGA through critical	We appreciate the appropriate mitigation sequencing being stated within this policy.

	areas avoidance, protection and mitigation.	
4.3.7 Page 4-22	Support the restoration of degraded shorelines and other critical areas to help minimize erosion, sedimentation and flooding while capitalizing on the ecosystem services these areas provide.	We strongly recommend incorporating ecosystem services into language expressing the importance of critical area values and functions. Protecting and restoring natural assets is often more cost-effective than engineered solutions. See FEMA's guide Building Community Resilience with Nature-based Solutions , as well as software to track these resources from Natural Capital Project . Furthermore, see Kitsap County's approach to quantifying ecosystem services through their Kitsap Natural Resource Asset Management Project .
4.3.8 Page 4-22	Protect natural drainage systems and courses associated with floodways, floodplains, or other areas subject to flooding.	Using WDFW's BAS would help attain this policy's goals. See comments related to 4.1.4 above.
4.4.9 Page 4-23	Track and monitor tree canopy coverage in the city to better capture carbon dioxide and stormwater runoff and increase shading.	See comments related to 4.1.2 above.
4.4.12 Page 4-23	Encourage climate-resilient vegetation and landscaping while preserving existing vegetation as much as possible due to its vital role in maintaining wildlife habitat and preventing additional stormwater runoff or soil erosion from new developments.	This additional language is taken directly from Lake Stevens' Climate Sustainability Plan . It is important to emphasize protecting vegetation, as landscaping often does not replace the ecosystem values and functions that once existed before clearing and grading.
Parks, Recreation, and Open Space		
5.1.1 Page 5-37	Provide a system of connected and multi-purpose neighborhood, community, and mini-parks, throughout the community, accessible to all residents that meet the following levels of service:	See comments in relation to 2.3.5 and 2.13.4 above.

5.1.4 Page 5-37	Promote balanced lake access for pedestrians and motorized and non-motorized watercraft so all segments of the population can enjoy the lake and have access to its recreational opportunities without resulting in a net loss of ecological values and functions.	No degradation of critical areas can occur to justify recreational use (WAC 365-196-830).
New Policy 5.1	Increase tree canopy cover to boost carbon sequestration, reduce heat islands, and improve air quality, prioritizing overburdened communities.	See comments related to 4.1.2 above.
5.2.1 Page 5-38	Provide a comprehensive network of multi-use trails for pedestrians, wildlife , bicycles and skating using alignments along the public rights-of-way, through public landholdings as well as...	See comments in relation to 2.3.5 and 2.13.4 above.
5.2.4 and 5.2.5 Page 5-38	Establish a north/south trail under the power lines as identified in the Lake Stevens Center and 20th Street SE Corridor subarea plans. Establish an east/west sidewalk trail along 24th Street SE and South Lake Stevens Road to connect to the Centennial Trail as identified in the 20th Street SE Corridor subarea plan.	Within all specific trail connection efforts, emphasis should be placed on implementing wildlife habitat corridors to achieve multi-benefit solutions. See resources in relation to 2.3.5 and 2.13.4 above.
New Policy 5.3	Identify compatible land uses that support connectivity and open space and plan open space to incorporate high-value habitats and corridors for animal movement.	See resources in relation to 2.3.5 and 2.13.4 above.
New Policy	Calculate the ecosystem services parks and open spaces provide in	This policy is paramount under this section's goal (goal 5.4: assert parks and recreation as critical infrastructure and vital public service). See

5.4	order to better assess cost benefits.	resources on how to calculate ecosystem services in comments related to 2.11.1 above.
5.7.3 Page 5-41	Cooperate with public and private agencies and with private landowners to set aside land and resources necessary to provide high-quality, convenient park and recreation facilities and pedestrian/wildlife trail corridors before the most suitable sites are lost to development.	Aligning this policy with pedestrian trail needs as well as wildlife corridor linkages would expand project eligibility for diverse funding opportunities and grant programs.
5.7.4 Page 5-41	Work with developers to identify additional parks, recreation and open space opportunities in redeveloping areas. Additionally, update developmental code so that redevelopment is held to higher standards.	See comments related to 2.3.5 above.
5.8.4 Page 5-42	Promote sustainable landscapes and wider vegetated areas adjacent to trails to increase the ecological functions of natural areas and utilize native vegetation in planted areas, where possible.	As discussed previously, widening areas adjacent to recreational trails and ensuring native vegetation growth offers multi-benefit solutions, such as wildlife habitat corridor usage and aesthetic as well as climate-resiliency benefits.
New Policy 5.12	Restore and maintain critical areas and open space areas to maximize the climate resilience benefits they provide.	Open spaces can act as climate-resilient assets that can serve as community spaces. All development within UGAs or densely populated areas should strive for open space retention, creation, and connection for the benefit of people and the environment.
Public Service and Utilities		
7.5.3 Page 7-26	Actively promote and support education efforts focusing on all facets of stormwater management, including the benefits of low impact development.	See resources related to 2.10.1 above.
Suggested Policy 7.6	To the greatest extent feasible, allow sewer systems only in areas	The State Department of Health adopted rules establishing public health standards for location, design, installation, operation, maintenance, and monitoring of onsite sewage systems (OSS),

	outside of frequently flooded zones.	including the responsibility of jurisdictions to identify any areas where OSS could pose an increased public health risk. The list of areas to identify includes frequently flooded areas, which should be mentioned here. As FEMA's Flood Insurance Rate Map (FIRM) modeling does not take climate change projections into consideration, we suggest Lake Stevens supplement FIRM maps with regulations that take BAS into consideration, including future climate-related conditions. For assessing future conditions, see Climate Mapping for a Resilient Washington , as well as FEMA's Resilience Analysis and Planning Tool (RAPT) for resources in visualizing these hazard areas.
7.7.5 Page 7-28	Encourage system design practices that improve climate and natural disaster resiliency, such as requiring all new development and redevelopment to bury power lines and minimize the number and duration of service interruptions.	This policy could be implemented via development code changes that require developers of new subdivisions to bury place power lines and associated infrastructure underground. See this FEMA case study regarding the benefits of burying power lines.
7.9.2 Page 7-29	Work with Snohomish County PUD and partner agencies/districts to promote and incentivize energy efficient systems and products while improving the safety and reliability of infrastructure vulnerable to climate change.	Energy utilities' infrastructure, such as transmission lines and gas plants, have been seen to start wildfires and are also impacted by wildfires, extreme heat, and other climate-exacerbated hazards. Working through the state's Utilities and Transportation Commission, local jurisdictions could review and comment on their local power provider's plans for responding to the risks of wildfires and other hazards. Recommendations could include removing tree limbs near power lines or burying lines, establishing redundancies, and creating small-scale energy generation systems.
7.9.5 Page 7-29	Coordinate with water purveyors and local and tribal governments to identify and develop additional and redundant water supply sources to meet the region's longterm water needs and growth strategy, recognizing the potential impacts on water supply from	Natural water infiltration and attenuation processes help retain, cool, and filter water. See resources related to 4.1.4 above for more information.

	climate change and fisheries protection and the water attenuation and drought prevention benefits provided by healthy, connected floodplains and riparian systems.	
7.9.8 Page 7-29	Promote low impact development projects and techniques on non-LID projects to conserve and use existing natural site features. Require LID techniques for all projects adjacent to waterways.	See information related to 2.10.1 above.
7.9.13 Page 7-30	Incorporate a climate change lens into the process of adopting new and updated city standards, codes and guidelines. Consider future climate conditions during the siting and design of capital facilities, including changes to temperature, rainfall, and sea level, to help ensure they function as intended over their planned life cycle.	Given that capital facilities represent significant public investments, it is prudent to ensure that facilities are designed and sited to be resilient to climate impacts. Local governments should identify climate impacts predicted for their communities and review their capital facilities plans in the context of climate change projections to ensure that planned facilities will be resilient throughout their intended lifespan and make changes as needed. See resources for assessing future climate-related conditions in comments related to Suggested Policy 7.6 above.
7.11.2 Page 7-31	Local essential public facilities should be sited to support the countywide land use pattern, support economic activities, reduce environmental impacts, provide amenities or incentives, and minimize public costs. This siting process should include: a. A definition of these facilities; b. An inventory of existing and future facilities; d. A public involvement strategy; e. Assurance that the environment and public health and safety are protected; and f. A consideration of alternatives to the facility.	See comment above. This list needs to include the consideration for future climate-related impacts.

Transportation		
8.6.2 Page 8-60	Encourage fish passage improvements and the use of low impact development techniques on transportation projects to reduce stormwater impacts and prevent measurable harm to streams, lakes, wetlands and other natural aquatic systems. Correct existing undersized culverts to enhance wildlife mobility and incorporate hydrologic climate impacts into the design of water-crossing structures (i.e., climate-smart culverts and bridges) for fish passage and habitat quality.	WDFW appreciates the incorporation of fish passage improvements within this policy. WDFW resources regarding fish barrier location and type can be found on our website . It is important to collaborate with WSDOT and neighboring jurisdictions to plan and prioritize culvert upgrades to ensure not only fish passage benefits but adequate projected flood flows and stormwater passage. We suggest this plan include other climate-related adaptations to culverts in order to handle water passage throughout Lake Stevens into the future, especially where terrestrial species connectivity can be restored simultaneously (i.e., with wider bridges or culverts). See WDFW's " Incorporating Climate Change into the Design of Water Crossing Structures: Final Project Report ," as well as WSDOT's " Wildlife Habitat Connectivity Consideration in Fish Barrier Removal Projects ."
8.7 Suggested Policy	Improve safety of the transportation system by incorporating high wildlife mortality conflict areas into site planning and incorporate this within traffic impact analysis.	See comments above (2.13.4) that highlight the importance in reducing safety risks and wildlife mortality in relation to traffic impacts. This would also support the listed policy, "8.7.10 Improve safety of the transportation system and, in the long term, work towards zero deaths and disabling injuries by 2044."
8.8.2 Page 8-62	Investigate alternative methods of obtaining financing for transportation improvements, including local option taxes, bonding, Local Improvement Districts, combining efforts with other agencies, combining redevelopment with wildlife habitat corridor linkage and ecosystem restoration opportunities , grant and loan opportunities such as the Public Works Trust Fund, and interlocal agreements for mitigation costs with Snohomish County.	Aligning this policy with ecosystem restoration and wildlife corridor linkages could expand project eligibility for diverse funding opportunities and grant programs.
Capital Facilities		

9.1.6 Page 9-25	Consider climate change, economic, and health impacts when siting and building essential public services and facilities.	We appreciate the inclusion of climate change within this policy.
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Please see the [Sound Choices Checklist](#) for additional guidance for all elements of the Comprehensive Plan.

Thank you for taking the time to consider our recommendations to better reflect the best available science for fish and wildlife habitat and ecosystems. We value the relationship we have with your jurisdiction and the opportunity to work collaboratively with you throughout this periodic update cycle. If you have any questions or need our technical assistance or resources at any time during this process, please don't hesitate to contact me or our Regional Land Use Lead, Morgan Krueger (morgan.krueger@dfw.wa.gov).

Sincerely,



Timothy Stapleton
Washington Department of Fish and Wildlife
Region 4 – Habitat Program Manager

CC:

Morgan Krueger, Region 4 Land Use Lead (morgan.krueger@dfw.wa.gov)
Kara Whittaker, Land Use Conservation and Policy Section Manager (Kara.Whittaker@dfw.wa.gov)
Marian Berejikian, Land Use Conservation and Policy Planner (Marian.Berejikian@dfw.wa.gov)
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Kirk Lakey, Assistant Regional Habitat Program Manager (kirk.lakey@dfw.wa.gov)
Region 4 Central District planning inbox (R4CPlanning@dfw.wa.gov)
Jeff Aken, WA Department of Commerce (jeff.aken@commerce.wa.gov)



Puget Sound Regional Council

1201 Third Avenue, Suite 500, Seattle, WA 98101-3055 | psrc.org | 206-464-7090

August 27, 2024

Russell Wright, Community Development Director
City of Lake Stevens
1812 Main Street
Lake Stevens, WA 98258

Subject: PSRC Comments on City of Lake Stevens Draft Comprehensive Plan

Dear Mr. Wright,

Thank you for providing an opportunity for the Puget Sound Regional Council (PSRC) to review a draft of the City of Lake Stevens' comprehensive plan. We recognize that the city has invested a substantial amount of time and effort in developing the draft plan and appreciate the chance to review the plan while in draft form. This timely collaboration provides an opportunity to review plan elements and prepares the city well for [certification](#) by PSRC once the full plan has been adopted.

We suggest the city consider the following comments as further work is completed for the comprehensive plan update to align with [VISION 2050](#) and the Growth Management Act. In particular, we encourage the city to work towards a final plan that demonstrates that land use assumptions are consistent across the plan and with adopted growth targets.

We reviewed the draft plan using the PSRC [VISION 2050 Consistency Tool](#). Key sections of the consistency tool are listed below on the left along with relevant comments on the draft plan on the right.

Transportation

Plan Review Consistency Tool	PSRC Comment on Draft Plan
Provide travel demand forecasts and identify state and local system projects, programs, and management necessary to meet current and future demands and to improve safety and human health (RCW 36.70A.070, MPP-T-4-5) Use consistent land use assumptions throughout plan (RCW 36.70A.070, WAC 365-196-430)	The land use assumptions used for the travel demand forecast do not appear to be consistent with adopted growth targets. The plan, including the transportation analysis, should be internally consistent and based on the adopted targets. Information on these requirements is provided in Commerce's Transportation Guidebook.
Identify maintenance and system preservation projects and programs necessary to maintain the ability of the transportation system to provide safe, efficient, and reliable movement of people, goods, and services (RCW 36.70A.070, MPP-T-1-2, T-4)	The city is commended for having a transportation maintenance program. The plan should include at least a conceptual plan for maintenance in the 20-year project list and financing plan. PSRC's Transportation Element Guidance provides information for developing a project list.

Regional Growth Strategy/Development Patterns

Demonstrate sufficient zoned development capacity to accommodate targets (RCW 36.70A.115)	The plan proposes land use changes to increase capacity to meet housing needs for all income levels. A capacity analysis of the updated land use assumptions should be provided in the plan. The capacity analysis in the draft plan includes ADUs in the 50-80% AMI band. Guidance from Commerce shows ADUs as meeting moderate income (>80-120% AMI) needs for higher-cost communities, such as those in the central Puget Sound region.
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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)	The city is commended for including several policies to address displacement. The plan should also include information on areas with higher risk for displacement. PSRC's Displacement Risk Mapping Tool identifies residential displacement risk areas.
Work towards annexation and the orderly transition of unincorporated urban areas by: Joint planning and urban development standards for urban unincorporated areas	VISION 2050 calls for all unincorporated lands within the urban growth area to transition into cities and assumes this transition to be largely complete by 2050. The city is encouraged to continue working with Snohomish County and other relevant parties to plan for the future of unincorporated urban growth areas and, as appropriate, incorporate policies and provisions to support efforts such as coordinating development standards, transferring permitting authority, and addressing service and infrastructure financing.

Climate Change/Environment

Identify and address the impacts of climate change and natural hazards on the region to increase resilience (MPP-CC-7-10, CC-Action-4)	The city should consider identifying and analyzing hazards related to climate change, including mapping of these hazards. The Puget Sound Hazards Map is a resource for this.
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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)	The city should recognize regional climate goals in the plan. PSRC's Climate Change and Resilience Guidance provides this information and other resources. It is also recommended to reference the Snohomish County Greenhouse Gas Emissions Analysis.
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)	The plan should include information and analysis on the connection between the city's vulnerable populations and climate change, in addition to the policy included.
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)	PSRC uses the Trust for Public Land's ParkServe mapping tool to identify park gaps. ParkServe shows that 44% of Lake Stevens' residents live within a 10-minute walk of a park. The city is encouraged to continue work to provide parks within a 10-minute walk of all residents.

Regional Collaboration

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)	The increased development capacity created by the plan provides the opportunity to further develop a transfer of development rights (TDR) program, and pursue revenue incentives, such as the Landscape Conservation and Local Infrastructure Program (LCLIP). These programs can help the city to gain
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	access to flexible infrastructure funding and support goals for both growing neighborhoods and conserving open space.
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PSRC has resources available to assist the city in addressing these comments and inform development of the draft plan. We have provided links to online documents in this letter, and additional resources related to the plan review process can be found at <https://www.psrc.org/planning-2050/vision/vision-2050-planning-resources>.

We appreciate all the work the city is doing and the opportunity to review and provide comments. We are happy to continue working with you as the draft progresses through the update and adoption process. If you have any questions or need additional information, please contact me at eharris@psrc.org.

Sincerely,



Erika Harris, AICP, Growth Management Planning
Puget Sound Regional Council

cc: Review Team, Growth Management Services, Department of Commerce

City of Lake Stevens - Notice of Public Hearing

PROJECT NAME: 2024
Comprehensive Plan Periodic
Update Map Amendments

LOCATION:
Various – See link for map and
more info

APPLICANT: City of Lake
Stevens

PUBLIC HEARINGS:
Planning Commission: October
2, 2024 @ 6:00 pm
City Council: October 22, @
6:00 pm
Hybrid Meeting Format
Zoom Online Platform (see city
website calendar for Zoom link)
or in person at The Mill building,
1808 Main Street, Lake Stevens

Proposed Project Description: As part of the 2024 periodic update to its Comprehensive Plan, the City of Lake Stevens is proposing a series of land use and zoning map amendments to help meet its future growth targets and better reflect existing/future conditions. You are receiving this notice because the proposed map amendments may impact properties you own or those within 300 feet of your property. For more information and to view maps of the proposed rezones near you, please use the link or QR code below.

rb.gy/xldo6a



The Planning Commission will conduct a public hearing and receive public testimony before making a recommendation to the City Council. The City Council will hold a separate public hearing to review the Planning Commission recommendation and take additional oral testimony prior to taking action.



It is the City's goal to comply with the Americans with Disabilities Act. The City offers its assistance to anyone with special needs, including the provision of TDD services.

Public Review & Comment: Any interested parties may submit written comments before the hearing or testify in person. Comments can be submitted to City Hall, PO Box 257, Lake Stevens, WA 98258 or by email to dlevitan@lakestevenswa.gov

PLANNING COMMISSION STAFF REPORT



Agenda Date: 9/18/2024

Subject: Q3 2024 Department Report and Work Plan Update

Contact Person/Department: Russ Wright, Community Development

Budget Impact:

Legal Review: No

RECOMMENDATION(S)/ACTION REQUESTED:

No action required. Staff will review the Planning and Community Development Department's quarterly report for Q3 2024 and discuss preliminary scopes of work for updates to the Process Code (primarily Chapters 14.16A and 14.16B LSMC) and Streets and Parking Code (Chapters 14.56 and 14.72 LSMC). Commissioners are encouraged to ask questions and provide feedback.

SUMMARY/BACKGROUND:

Long Range Update

Each year, staff develops a Long-Range Planning Work Program, reviewed by the Planning Commission and approved by the City Council. The work program includes comprehensive plan amendments, development code amendments, annexations and other special projects. The work program with status updates is attached for review (**Attachment 1**). Items with changed action dates are shown in underline mode. We are closing out the third quarter and wanted to provide a status update and identify next projects for the remainder of the year.

Comprehensive Plan Amendments

Staff has spent much of the year working on the 2024 Comprehensive Plan Periodic Update, with a specific emphasis on incorporating new growth targets, climate change and equity provisions. A draft of the plan was issued on July 26, 2024, and the city has received several public and agency comments, which will be discussed separated during the Commission's September 18 meeting. Public hearings are scheduled for the Planning Commission on October 2 and the City Council on October 22.

Development Code

For the rest of 2024 and moving into early 2025 we will focus on implementation tasks including the streets/parking chapters, impact fees and review process. A scope for the streets and process code updates are included as **Attachments 2 and 3**.

- The streets and parking review will coincide with the new transportation element and updates to the city's engineering standards. Revisions will focus on clarity of administration, current best practices and low impact design.
- The process code update is in direct response to changes to state law (RCW 36.70B and WAC 365-196) that require more streamlined timelines for processing permits. This code will be broken up topically to reflect mandatory changes, changes needed for consistency and code clean up.

Planning and Community Development staff is also coordinating discussions of parks and transportation impact fee adjustments with the Parks and Public Works departments, which will start later this year to coincide with adoption of the city budget. In 2025, we will focus on housing, critical areas and industrial area code updates.

Permitting

The permit numbers for the third quarter of 2024 (to date) are included as **Attachment 4**.

APPLICABLE CITY POLICIES:

ATTACHMENTS:

1. Attachment 1 - Long Range Work Plan Q3 Update
2. Attachment 2 - Streets and Parking Code Update Scope
3. Attachment 3 - Process Code Scope of Work
4. Attachment 4 - Permit Report_9-12-2024



One Community Around the Lake

Lake Stevens 2024 Long Range Work Program – Project Status					
Amendments	1 st quarter	2 nd quarter	3 rd quarter	4 th quarter	Status / Notes
<i>General Zoning Code</i>					
1. Code Clean Up (Various Sections)	PC/CC				Complete – Ordinance 1179
2. Process Code Update 14.16A and 14.16B – Phase 1	CC				Complete – Ordinance 1179
3. Solicitors License Update – Chapter 4.04		<u>CC</u>			Complete – Ordinance No.1185
4. Building Code Update (14.80)	CC				Complete – Ordinance 1160
5. Mixed-use Code Update (14.36 and others) Will start in 2025 with housing code updates			<u>PC/CC</u>	<u>PC/CC</u>	Review the city's mixed-use regulations, within subareas and designated mixed-use zoning districts.
<i>Comprehensive Plan Zoning Code Implementation</i>					
6. Streets and Sidewalk Code (14.56 and others)			<u>PC/CC</u>	PC/CC	Update streets code to reflect transportation analysis, including multi-modal uses following the Comprehensive Plan. Concurrently, the city will update its EDDS.
7. LS Industrial Center Code Implementation (Various Sections) Will start in 2025 after comprehensive plan update is complete. City proposes to hire a consultant to assist.			<u>PC/CC</u>	<u>PC/CC</u>	Code updates to implement Lake Stevens Industrial Center Analysis.



One Community Around the Lake

Amendments	1 st quarter	2 nd quarter	3 rd quarter	4 th quarter	Status / Notes
8. Design Review (Various Sections) Combine with process code update as a clean up item			<u>PC/CC</u>	PC/CC	Update design review code language to include only “clear and objective standards”, as required by HB 1293. Complete by June 2025.
9. Process Code Update Phase II (14.16A and 14.16B) Start in 4th Quarter of 2024 and complete in 2025			<u>PC/CC</u>	<u>PC/CC</u>	Code updates to the city’s review process to improve and streamline permit review in accordance with new state law timelines as well as HB 1293 and SB 5290.
10. Housing Action Plan Implementation (Various Sections) On-hold until comp plan is complete – start in 2025			<u>PC/CC</u>	<u>PC/CC</u>	Update infill code and address HB 1220 requirements for permanent supportive housing (PSH) and emergency housing. Update temporary encampment regulations. Revisit Mixed-Use, cottage housing (revise/or delete) and the infill section.
11. Park Impact Fees (14.120) Start in 4th Quarter of 2025	TBD following Comp Plan adoption. Will coordinate with Park Department				Update Parks Impact Fees, including methodology and exemptions.
12. Transportation Impact Fees (14.112) Start in 4th Quarter of 2025	TBD following Comp Plan adoption will coordination with Public Works				Add in fees, TIZ, Active transportation.



Comprehensive Plan					
1. 2024 Periodic Update (All Elements)	PC / CC	PC / CC	PC / CC	PC/CC	Carryover. Complete public engagement, land use alternatives analysis, goal/ policy development, and revised elements and maps. Adoption due by December 2024.
2. Transportation Analysis	PC / CC	PC / CC	PC / CC	PC/CC	Carryover. Complete multi-modal transportation analysis and update of the Comprehensive Plan Transportation Element as part of 2024 Periodic Update.
3. Utilities Element / Sewer Plan Update	TBD. Timeline likely 12-18 months, carrying forward into 2025.				Implementation task for merger with sewer district
Annexations					
1. Explore Annexation of remaining portions of UGA	TBD - 2025			There are three remaining areas of UGA (Hwy 92, 12th St NE, and south of 20th St SE) which the city may consider for annexation.	
2. Petition Placeholder	TBD			Process citizen-initiated annexations as requested	
Miscellaneous					
1. Snohomish County Tomorrow / TAC / Alliance for Affordable Housing	Continue participation in SCT, TAC and AHA – report out to PC and Council on actions				
2. Economic Development Marketing Materials	Ongoing				

General Schedule – subject to change based on staff and funding availability.

1st Quarter January through March

2nd Quarter April through June

3rd Quarter July through September

4th Quarter October through December



Scope of Work

Code Amendments for Streets and Sidewalks (Chapter 14.56 LSMC) and Parking (14.72 LSMC)

The Lake Stevens Municipal Code Chapter for Streets and Sidewalks was adopted in 1995. Minor updates have occurred over the years, but the code does not reflect best practices for design or administration based on changes in fire requirements, local regulations and state law. As the city is completing updates to its transportation element and will begin concurrent updates to the city's Engineering Design and Development Standards it must modernize and update its code for consistency. Likewise, the city's parking code was adopted in 1995 and has not had significant updates since. The city needs to make sure the parking calculations align with best practices, recognize electric vehicle needs and provide sufficient flexibility to address unique circumstance.

The purpose of these code amendments is to:

- Clarify administrative process and procedures for each chapter
- Ensure street standards align with the city's Engineering, Design and Development Standards and industry standards
- Make certain parking standards align with industry standards and support the subarea regulations
- Emphasize low impact development and sustainable development
- Identify standards, exceptions and flexibility that balance aesthetics, and property rights

Regulations affected:

- Chapter 14.38 LSMC
- Chapter 14.56 LSMC
- Chapter 14.72 LSMC
- Engineering Design and Development Standards

Timeline:

- Approximately 6 to 8 months until final adoption.

City of Lake Stevens Code Revision Work Program
Code Amendments for Streets and Sidewalks (Chapter 14.56 LSMC) and Parking (14.72 LSMC)

	[Streets / Sidewalk and Parking / NO. 2024-XX] Draft Regulations					
ACTIVITY	OCTOBER	NOVEMBER	DECEMBER	JANUARY	FEBRUARY	APRIL
Hire Consultant	30-days					
Research	30 – 60 days					
Draft Code Amendments			30 – 60 days			
Draft Ordinances				14-days		
Attorney Review					7 Days Before Hearing	
Prepare & Issue SEPA (comment/appeal)				14-day review		
Commerce Review				60-day review		
Publish Notice Planning Commission Public Hearing					Notice Twice – 1 st notice 10 Days Before Hearing	PC Public Hearing 1 st Reading
Planning Commission Review (B-briefing; PH-public hearing)		PC Briefing	PC Briefing	PC Briefing	PC Briefing	
Publish Notice City Council Public Hearing						Notice Twice – 1 st notice 10 Days Before Hearing
City Council Briefings & Workshops (B-briefing; PH-public hearing)			CC Briefing		CC Briefing	
City Council Public Hearing, 1 st Reading						DATE (PH) 1 st Reading
City Council Public Hearing, 2nd & Final Reading						DATE (PH) 2 nd Reading if needed
Effective date						Code Revisions Effective -5 Days After Publication

Purpose: Update the city's streets / sidewalk and parking chapters for inclusion in the Lake Stevens Municipal Code.

9/18/2024



Scope of Work

Process Code Amendments to Chapters 14.16A/14.16B and Other Related Chapters

The Lake Stevens Municipal Code (LSMC) currently addresses “Process Code” topics such as land use review processes, decision timelines, appeals, extensions, expirations, director/staff duties and authority in multiple chapters, with the majority found in Chapters 14.16A and 14.16B. The current code language is spread out across multiple chapters and information can be hard to find and sometimes results in conflicts between code sections, and as such requires a comprehensive update. Several minor amendments were included in the code clean-up adopted by Ordinance 1179 earlier this year.

At the Commission’s [October 4, 2023 meeting](#), staff introduced the need to update these chapters to streamline/consolidate the code as well comply with recent state legislation, most notably [SB 5290](#) (which affects review processes and timelines for different land use applications) and [HB 1293](#) (which requires updates to local design review regulations to only allow clear and objective standards).

SB 5290 will modify the review time periods in [RCW 36.70B.080](#), effective January 1, 2025, to the following, which will replace the current standard of 120 days:

Project Permit Type	Time Periods
Public Notice Not Required (Type I)	65 Days
Public Notice Required (Type II)	100 Days
Public Notice and Hearing Required (Type III and above)	170 Days

The purpose of these code amendments is to:

- Simplify, streamline and consolidate code sections related to the development and design review process, including review processes, approvals, appeals, extensions, and director authority
- Comply with recent changes to state law regarding decision timelines and design review standards

Regulations affected:

- Chapter 14.16A LSMC
- Chapter 14.16B LSMC
- Chapter 14.16C LSMC
- Multiple other chapters that address timelines, appeal processes, and substantive authority

Timeline:

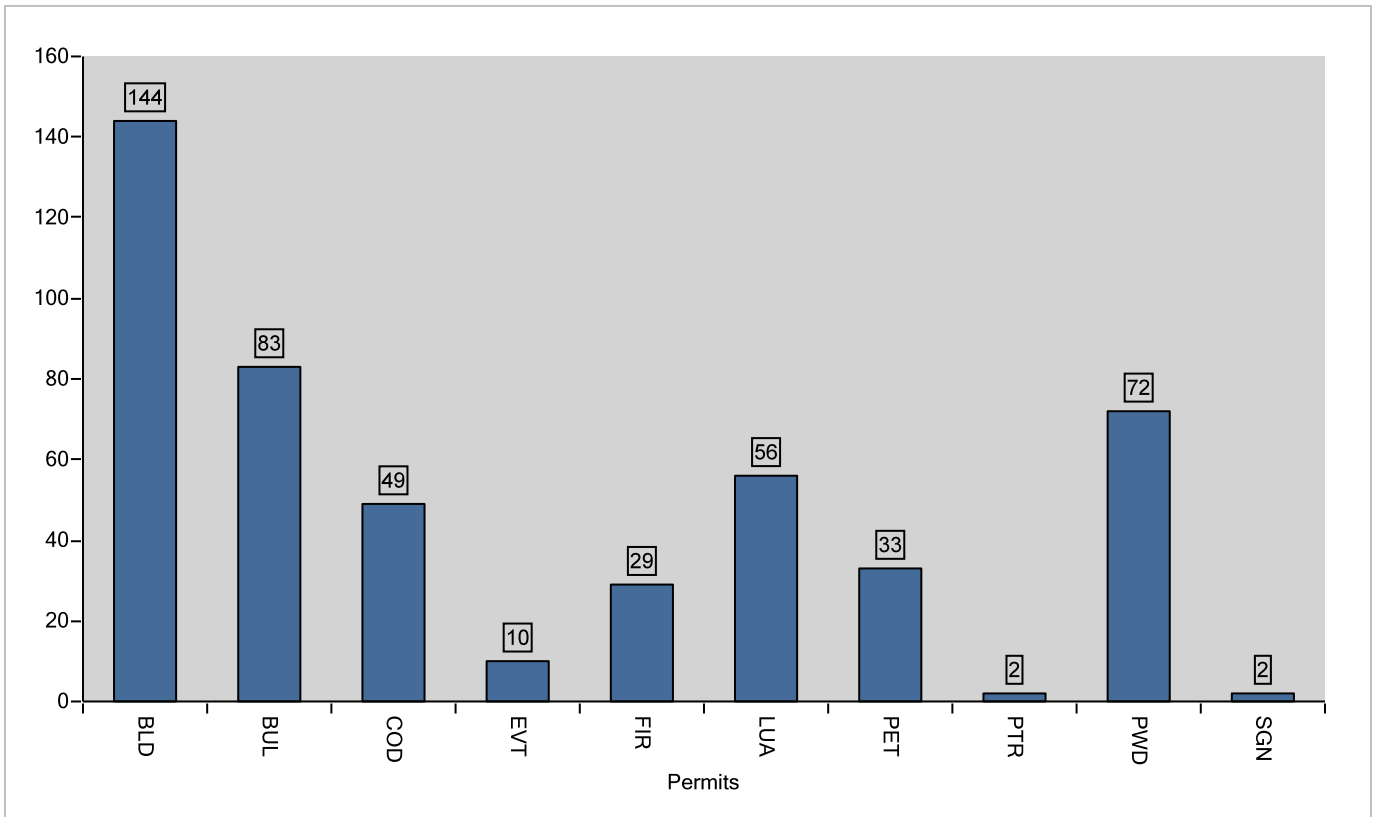
- Approximately 6 months until final adoption; initial focus on items effective January 1, 2025



Permit Summary

9/12/2024 12:26:34 PM

Permits from 07/01/2024 to 09/30/2024



Description	07/01/2024 - 09/30/2024	%	07/01/2023 - 09/30/2023
Total Permits:	480	-19.6%	574
Review Comments:	1534 (809.00 hrs)	18.9%	1244 (702.67 hrs)
Inspection Comments:	2537 (789.92 hrs)	5.7%	2392 (581.75 hrs)
Scheduled Inspections:	3354	38.1%	2077
Active Permits:	17075		