

ATTACHMENT 3

DRAFT

COMPREHENSIVE PLAN UPDATE

FINDINGS AND CONCLUSIONS

1. On April 3, 2015, the public review draft of the City of Monroe integrated draft Comprehensive Plan/Draft Environmental Impact Statement (DEIS) was issued for public comment. The public comment period was for 60 days, specifically for the purpose of State Agency review and for SEPA related comments on the integrated draft Comprehensive Plan/Draft Environmental Impact Statement (DEIS).

2. The Draft Comprehensive Plan consists of several elements/chapters including:
 - Chapter 1 - Plan Introduction
 - Chapter 2 - Community Vision
 - Chapter 3 - Land Use
 - Chapter 4 - Transportation
 - Chapter 5 - Economic Development
 - Chapter 6 - Housing
 - Chapter 7 - Parks, Recreation, & Open Space
 - Chapter 8 - Capital Facilities & Utilities
 - Chapter 9 - Shorelines & Natural Environment
 - Chapter 10 - Plan Implementation

Other components of the integrated Comprehensive Plan/DEIS include, but are not limited to, the State Environmental Policy Act (SEPA) documentation, an economic development strategy document, an updated Transportation Plan, an updated Parks and Recreation Plan and an updated utilities system plan (water, sewer, storm drainage).

3. The draft Comprehensive Plan evaluates growth, land use and other change for the City of Monroe for a 20 year planning horizon (to 2035). The DEIS reviews environmental impacts of proposed goals, policies, alternative land use plans, and other Comprehensive Plan features at a non-project level. The Comprehensive Plan was prepared as an integrated GMA Comprehensive Plan and State Environmental Policy Act (SEPA) document, as allowed for under State law.

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4. Preparation of the Comprehensive Plan is intended to comply with the requirements of RCW 36.70A.130 with regards to the major GMA update requirements of the Growth Management Act. RCW 36.70A.130(5), under the section entitled “Comprehensive plans — Review procedures and schedules — Amendments.” states,
 - “(5) Except as otherwise provided in subsections (6) and (8) of this section, following the review of comprehensive plans and development regulations required by subsection (4) of this section, counties and cities shall take action to review and, if needed, revise their comprehensive plans and development regulations to ensure the plan and regulations comply with the requirements of this chapter as follows:
 - (a) On or before June 30, 2015, and every eight years thereafter, for King, Pierce, and Snohomish counties and the cities within those counties;”
5. On June 2, 2015, the Monroe City Council adopted Resolution No. 011/2015 indicating the City’s intent to review and revise the Comprehensive Plan by July 28, 2015.
6. On July 28, 2015, the Monroe City Council adopted Resolution No. 014/2015 indicating the City’s intent to review and revise the Comprehensive Plan by September 29, 2015. On-going review by the Planning Commission, the need to address comments from the Washington State Department of Commerce, Puget Sound Regional Council and other interested parties, and the need for the consultant to prepare a revised draft in accordance with the Planning Commission recommendation necessitated additional time beyond July 28, 2015 to complete the periodic review process.
7. On October 13, 2015, the Monroe City Council will consider Resolution No. 018/2015 indicating the City’s intent to review and revise the Comprehensive Plan by December 1, 2015. On-going review by the Planning Commission and the need for the consultant to prepare a revised draft in accordance with the Planning Commission recommendation necessitated additional time beyond July 28, 2015 to complete the periodic review process.
8. In accordance with RCW 36.70A.106 entitled” Comprehensive plans — Development regulations — Transmittal to state — Amendments — Expedited review”, notice of the proposed Comprehensive Plan was transmitted to the Washington State Department of Commerce on April 3, 2015.
9. The 60-day State agency review process as well a 60-day Draft EIS comment period concluded on June 2, 2015. Public comments related to the proposed Comprehensive Plan’s environmental impacts received during the 60 day (April 3, 2015-June 2, 2015) comment period are to be responded to in the final EIS.

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The public still had opportunity to make comment on the draft Comprehensive Plan after the 60-day comment State agency/Draft EIS comment period, although such comments will not be responded to in the Final EIS.

The only State agency comment on the proposed Comprehensive Plan received during the State agency 60-day comment period was from the Washington State Department of Commerce. Its comment dealt with a paragraph in the Shorelines and Natural Environment Element (Chapter 9) regarding clarifying the relationship between the Shoreline Management Act and the Growth Management Act. Revised text was included to address this comment.

10. The Planning Commission opened the public hearing on the integrated draft on Monday, April 20, 2015. To encourage public participation and public comment, the Planning Commission continued its April 20, 2015 public hearing to Monday, May 4, 2015 and again to May 11, 2015.

On May 11, 2015, the Planning Commission closed the public hearing for the purpose of accepting public testimony, but continued the public hearing to Monday, May 18, 2015 for the purpose of deliberating and preparing findings. The public hearing was continued to the following dates: May 26, 2015, June 1, 2015, June 8, 2015, June 15, 2015, June 22, 2015, June 29, 2015, July 13, 2015, July 20, 2015, July 27, 2015, August 10, 2015, August 17, 2015, August 24, 2015, August 31, 2015, September 14, 2015, September 21, 2015, September 28, 2015, October 12, 2015 and October 19, 2015.

11. In general, Chapters 1, 2, 3, 4, 5, 6, 8, 9 and 10 involved edits from the public release version issued April 3, 2015. In reviewing Chapter 7 (Parks, Recreation and Open Space), the Planning Commission identified certain limited revisions, deferring the balance of the Chapter to the work of the Parks Board.
12. On July 17, 2015, the Monroe City Council passed and approved Resolution 2012/020 – adopting Comprehensive Plan Amendment Procedures. Included among those procedures are review criteria the Planning Commission shall use in considering whether to not to recommend approval or approval with modification of the proposed plan amendment.
13. As provided for in Resolution No. 2012/020, each plan amendment shall meet the following criteria to be recommended for approval:
 - i. Shall not adversely affect public health, safety, or welfare in any significant way.

- ii. Shall be consistent with the overall goals and intent of the Comprehensive Plan, as amended by the proposals
 - iii. Shall be in compliance with the Growth Management Act and other State and Federal laws.
 - iv. Must be weighed in light of cumulative effects of other amendments being considered.
14. Resolution No. 20/2012 also states that in addition to the mandatory review criteria above (in Finding #13), any proposed amendment must meet the following additional criteria unless compelling reasons justifies its adoption without them.
- i. Addresses needs or changing circumstances of the city as a whole or resolves inconsistencies between the Monroe Comprehensive Plan and other city plans or ordinances.
 - ii. Environmental impacts have been disclosed and/or measures have been included that reduce possible adverse impacts.
 - iii. Is consistent with the land uses and growth projections that were the basis of the comprehensive plan and/or subsequent updates to growth allocations..
 - iv. Is compatible with neighboring land uses and surrounding neighborhoods, if applicable.
 - v. Is consistent with other plan elements and the overall intent of the comprehensive plan.
15. The following is an analysis of the proposed Comprehensive Plan update against the review criteria the Planning Commission shall consider in determining whether to not to recommend approval or approval with modification of the proposed plan amendment. The following identifies the criteria that each plan amendment shall meet to be recommended for approval (**in bold**), followed by an analysis.
- i. **Shall not adversely affect public health, safety, or welfare in any significant way.**

The proposal does not adversely affect public health, safety, or welfare in any significant way. Rather, the proposed Comprehensive Plan advances the public health, safety, or welfare in a significant way by ensuring the City of Monroe Comprehensive Plan is in compliance with the requirements of the

Washington State Growth Management Act and also is consistent with the Puget Sound Regional Council's Metropolitan Transportation Plan.

The City of Monroe's (and its urban growth area) 20-year population and employment targets are addressed in the proposed Comprehensive Plan. Strategies to accommodate the increased population and employment are included in the Comprehensive Plan. Transportation, parks and utilities plans are all based on the same population and employment targets to ensure consistency across all public facilities plans. The public welfare is advanced by the City's ability to plan for and accept its share of regional growth.

The proposed Comprehensive Plan also benefits the public welfare, health and safety through goals and policies supportive of river access, walkability pedestrian safety and mobility, finding solutions to trains blocking traffic, implementing the US 2 bypass to alleviate traffic, and more east-west connectors.

Public welfare is also enhanced through the Comprehensive Plan's readability and legibility so the public can understand the plan document. Considerable effort has been put in to editing the Comprehensive Plan to ensure it is readable and user friendly for the public. This will encourage its use by the public and also reduce the need for interpretations.

Editing of the Comprehensive Plan also sought to present a very positive image of the City of Monroe through narrative and pictures. The Comprehensive Plan also focuses on what the City can do rather than on what cannot be done.

The environmental impacts of the proposal have also been reviewed as part of an integrated GMA Comprehensive Plan/Draft Environmental Impact Statement. Environmental impacts of the proposal have been analyzed.

ii. Shall be consistent with the overall goals and intent of the Comprehensive Plan, as amended by the proposals

The proposed Comprehensive Plan will replace the existing City of Monroe Comprehensive Plan in its entirety. Rather than take an approach of making a series of amendments throughout an existing Plan, the City of Monroe has prepared an entirely new Comprehensive Plan.

This approach lends itself to ensuring the proposed Comprehensive Plan is, as required by the GMA, internally consistent. An update to the functional plans (e.g. Transportation Plan, Parks and Recreation Plan and Utilities

Systems Plan) simultaneous with this Comprehensive Plan update facilitates consistency amongst plan elements. The same population and employment forecasts and land use assumptions were used in all Plan update documents.

The proposed Comprehensive Plan includes eight goal statements. Rather than being scattered throughout the Comprehensive Plan, all of the Comprehensive Plan's goal statements and Comprehensive Plan policies and action statements are contained in Chapter 2. Comprehensive Plan policies are linked to plan chapters they most closely support. Plan consistency is promoted through this formatting approach.

iii. Shall be in compliance with the Growth Management Act and other State and Federal laws.

The proposed Comprehensive Plan is being prepared as part of a major GMA update as required by RCW 36.70A.130. The proposed Comprehensive Plan is necessary to comply with the requirements of the Washington State Growth Management Act (GMA). Population and employment projections for the City and its urban growth area were incorporated into the Comprehensive Plan.

Development of the proposed Comprehensive Plan involved early and continuous public involvement as required by the GMA (Citizen participation is also a Statewide Planning goal (RCW 36.70A.020(11))). The public involvement process has been extensive including a week long studio, joint workshops amongst City boards and commissions and the City Council, multiple Planning Commission workshops, a Planning Commission public hearing and multiple City Council briefings over almost a two year period. Many comments received through this public involvement process were incorporated into the proposed Comprehensive Plan.

The proposed Comprehensive Plan is also sensitive to the needs and rights of private property owners in general. Private property rights is a statewide GMA goal (RCW 36.70A.020(6)).

The proposed Comprehensive Plan is also consistent with all other Statewide Planning Goals identified in RCW 36.70A.020.

Distribution and circulation of the proposed Comprehensive Plan to State and Federal agencies ensures that the Plan takes into consideration other state and federal laws.

iv. Must be weighed in light of cumulative effects of other amendments being considered.

The Comprehensive Plan update is being accomplished through preparation of a new Comprehensive Plan (rather than by amendments to an existing plan). The Transportation Plan, Parks and Recreation Plan and utilities system plans are being updated simultaneously with this update. Environmental review is being accomplished for all of the documents at the same time as part of the update process, ensuring cumulative impacts are addressed.

In this respect, the Plan update process is being conducted so that cumulative effects are more evident and transparent, as review of all key plan documents are taking place simultaneously.

16. City of Monroe Resolution No. 20/2012 also states that in addition to the mandatory review criteria above, any proposed amendment must meet the following criteria unless compelling reasons justifies its adoption without them. The criteria are identified **in bold**, followed by an analysis:

i. Addresses needs or changing circumstances of the city as a whole or resolves inconsistencies between the Monroe Comprehensive Plan and other city plans or ordinances.

Among other items, the proposed Comprehensive Plan addresses the GMA update requirements. This includes a requirement to incorporate and plan for updated 20-year (2035) population and employment forecasts for the City and its urban growth area. The proposed Comprehensive Plan adequately addresses this.

In doing so the proposed Comprehensive Plan recognizes the Monroe is changing. It is no longer a “small town” but is and has become a regional center.

Changes to certain geographical areas of the City are acknowledged. For instance, the Plan addresses the area near and at the air field and is sensitive to what the airport property owner might want to do in the future, while still providing for the airport’s continuing use.

The proposed Comprehensive Plan also seeks to make Downtown thriving, recognizing that Monroe’s Downtown has lost some of the strength and vibrancy it has had in the past. The proposed Comprehensive Plan also seeks to direct certain types of uses downtown, such as retail on ground floor – in

order to promote Downtown's vibrancy. Increasing residential density downtown is also pursued to support economic growth.

No plan or ordinance inconsistencies are specifically addressed, although the preparation of the Comprehensive Plan in conjunction with updating the Transportation, Parks and utilities systems plans at the same time enhances and strengthens plan coordination. This represents exceptional consistency in planning as part of the GMA update.

ii. Environmental impacts have been disclosed and/or measures have been included that reduce possible adverse impacts.

State Environmental Policy Act environmental review on the proposed Comprehensive Plan was conducted as required by the Washington State Environmental Policy Act (SEPA). A draft Environmental Impact Statement (DEIS) was prepared for the Comprehensive Plan and issued April 3, 2015 with a 60 day public comment period. The DEIS identifies impacts and measures to mitigate such impacts.

The Draft EIS was prepared as an integrated Comprehensive Plan/Draft EIS as provided for in State law to promote greater efficiency and analysis between the proposed Comprehensive Plan and the SEPA environmental analysis. SEPA/GMA integration also ensures that environmental analyses under SEPA occurred concurrently with and as an integral part of the planning and decision making under GMA.

Comments on the DEIS will be responded to as part of the final EIS (FEIS). After Plan adoption, additional environmental review will occur for non-exempt project and non-project actions.

iii. Is consistent with the land uses and growth projections that were the basis of the comprehensive plan and/or subsequent updates to growth allocations.

The proposed Comprehensive Plan update incorporates updated 2035 employment and population allocations. The proposed Comprehensive Plan is consistent with the land uses and regional growth projections.

iv. Is compatible with neighboring land uses and surrounding neighborhoods, if applicable.

This criteria is not entirely applicable. The proposed Comprehensive Plan is an update for the entire city (and Monroe urban growth area) rather than being site-specific or for a neighborhood area.

Nonetheless, the proposed Comprehensive Plan takes into consideration the need to promote compatible development and densities within the City.

v. Is consistent with other plan elements and the overall intent of the comprehensive plan.

The proposed Comprehensive Plan is internally consistent.

This Comprehensive Plan update is being accomplished through preparation of a new Comprehensive Plan (rather than through amendments to an existing plan). The Transportation Plan, Parks and Recreation Plan and utilities system plans are being updated at the same time in conjunction with this Comprehensive Plan update.

Environmental review was accomplished for the Comprehensive Plan and other functional plan documents (i.e. transportation, parks and recreation and utilities) at the same time as part of the update process. This ensures cumulative impacts are addressed. Cumulative effects are more evident and transparent. Consistency is achieved.

CONCLUSIONS

1. The Monroe Planning Commission held a duly advertised public hearing to consider the proposed Comprehensive Plan update.
2. The Comprehensive Plan Update meets the review criteria contained in City of Monroe Resolution No. 2012/020.
3. Compliance with Monroe Municipal Code (MMC) Chapter 20.04 (State Environmental Policy Act) has been met.
4. The proposed Comprehensive Plan has been submitted to State agencies for the 60 day state agency review process in accordance with RCW 36.70A.106.