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August 16, 2010

Mr. Joshua Freed  
East Monroe Economic Development Group LLC  
18404 102<sup>nd</sup> Avenue NE  
Bothell, WA 98011

**COMPREHENSIVE PLAN MAP AMENDMENT DOCKET APPLICATION**

Dear Mr. Freed,

The City received your application for a Comprehensive Plan Map Amendment that includes tax parcels 27070600102500, 27070500206100, 27070500206200, 27070500206300, 27070500206400, 27070500203300, 27070500203301, and 27070500203303 within the designated submittal period for the 2011 Comprehensive Plan review cycle. City staff assigned your application the following file number and name: CPA 2011-01 East Monroe Economic Development Group.

The Planning Commission will review all comprehensive plan amendment applications on September 13, 2010. Comprehensive Plan amendments follow the general process as outlined below:

1. Planning Commission workshop(s);
2. Planning Commission public hearing for docketing and recommendation to City Council;
3. City Council workshop, upon receipt of a recommendation from the Planning Commission, the City Council shall adopt, adopt as modified, deny, or remand the application(s) to the Planning Commission for further consideration;
4. If docketed, there will be additional fees due at that time; and
5. Staff will then begin an in-depth review and discussion with the Planning Commission concluding with a project-specific public hearing and a final recommendation to City Council.

Staff reviewed your submitted application and has the following comments that you will need to address should the City Council docket the proposal:

Mr. Joshua Freed  
August 16, 2010  
Page 2

### Planning

There are several inconsistencies found in the application, in both form and content.

### Application

There are inconsistencies in the number of parcels and total acreage listed in the application. County data shows seven parcels totaling 79.82 acres. Two parcel numbers (27070500203301 & 27070500203303) associated with 21509 SR 2 (Parcel # 27070500203300) are manufactured homes. Additionally, large portions of parcels 1, 2, 3, & 4 of Short Plat SP 199005 have been placed in a Native Growth Protection Area for perpetuity, prohibiting development potential in these areas. The remainder of the properties would likewise be required to set aside critical areas and buffers in a Native Growth Protection Area easement.

Tom McCann and Justin Vanlom, the owners of Parcel # 27070500203400, are not listed on nor have they signed the application.

### Appendix I

Proposal Narrative.

**Analysis:** The applicant has provided a narrative that includes the proposed changes and the reasons for requesting the land use change.

### Appendix II Part A. criteria for further review

Question 1 relates to consistency with the Comprehensive Plan goals and policies.

**Analysis:** The applicant <sup>only</sup> references the vision statement from the Executive Summary to the Comprehensive Plan. The applicant has not fully addressed how the proposal is consistent with the current Comprehensive Plan. Staff has identified inconsistencies with goals and policies from the Natural Environment Element, Land Use Element, Capital Facilities Element, Utilities Element, Economic Development Element, and Transportation Element (Comprehensive Transportation Plan), Shoreline Element (Shoreline Master Program).

Question 2 asks for proposed amendment language.

**Analysis:** The applicant noted N/A (not applicable) to proposed amendment language. The applicant checked that they were applying to change an element of the Comprehensive Plan on the application form. The applicant has only proposed changes to the land use map (not checked in the application). The applicant needs to clarify the intent of the proposal (i.e., are they proposing a map change or are they also proposing an element change). If docketed, the proposed land use change would require probable changes to the Shoreline Master Program (which undergoes an approval process by the Department of Ecology), Transportation Plan, Stormwater System Plan, Sewer Plan, and Water System Plan.

Question 3 asks for an explanation of the amendment.

**Analysis:** The applicant provided a ~~short~~ explanation related to the proposed amendment.

Question 4 requires a map or description of the affected areas.

**Analysis:** The applicant provided the Section, Township, and Range (5-27N-7E), Parcel ID numbers and a map of the affected properties. Staff has noted some inconsistencies in comments related to the application form.

Question 5 requires the accurate description of significant impacts to public health, safety, and welfare.

**Analysis:** The applicant has not noted significant impacts to public health, safety, or welfare. The intent of this question is to disclose probable impacts to public facilities, services, and environmental health. Upon disclosure of potential impacts, staff can analyze these to determine consistency with adopted levels of service and recommend mitigation measures.

Question 6 relates to consistency with the Growth Management Act (GMA), Chapter 36.70A RCW.

**Analysis:** the applicant suggests that the proposal is generally consistent with GMA by intensifying urban uses, but has not cited specific sections to substantiate the claim. Staff has listed some specific planning goals, found in RCW 36.70A.020 that relate to this proposal and should be addressed more completely by the applicant.

- (1) Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.
- (5) Economic development. Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.
- (8) Natural resource industries. Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands, and discourage incompatible uses.
- (10) Environment. Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.

- (12) Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.

Appendix II Part B. criteria to show justification for proposed change(s)

Question 1 requests an explanation of changing circumstances.

**Analysis:** The applicant states that the city needs additional economic development as a justification for changing circumstances in the city. This assessment is not consistent with findings of the *2007 Snohomish County Buildable Lands Report* that show adequate economic capacity in the city or the city's findings from the *2005-2025 Comprehensive Plan* that there are adequate parcels for retail commercial development, but a lack of suitable industrial parcels for future economic growth. In addition, the applicant fails to mention that the city reviewed similar proposals in 2005 and 2006. The applicant has not shown a change in circumstances since the earlier requests.

Question 2 relates to the disclosure of environmental impacts and possible mitigation measures.

**Analysis:** The applicant provided an environmental checklist that includes incomplete and erroneous information. Additionally, the supporting documents are out of date or are limited in scope. If docketed, additional documentation of environmental impacts will need to be submitted (updated critical areas and geotechnical reports, traffic analysis, etc.) at the applicant's expense. As noted, the area is located in the "100-year" flood hazard area and is adjacent to a geologically hazardous area. The site is within the shoreline boundary of the Skykomish River and contains a stream and wetlands. Any potential changes to these systems will likely have direct or indirect impacts. Based on a preliminary analysis of the probable impacts to the natural environment (e.g., wetlands, streams, steep slopes, shoreline, and flood hazard) and built environment (e.g., public services, roads, utilities, and adjacent land uses), staff assumes an environmental impacts statement will be required to fully address significant impacts. An environmental impact statement will provide land use alternatives and include necessary mitigation measures.

Question 3 requires consistency with land use and growth projection.

**Analysis:** The applicant has not shown consistency with growth projections to substantiate the requested change, see staff response to Part B, Question 1.

Question 4 relates to consistency with adjacent land uses:

**Analysis:** The applicant states, "The subject properties front Highway 2 and really have no neighbors that would be adversely affected by the change in land use designation..." The adjacent uses by zoning include commercial farmland, Rural R-5,

Rural Conservation in the unincorporated County, and UR 9600 in city limits. All adjacent land uses are lower intensity uses.

Additional Criteria for pre-docket Review

1. Consideration of the previous record if the amendment was reviewed and denied during a previous comprehensive plan review.

**Analysis:** As noted, the Heritage Baptist Fellowship applied for a map amendment (CPA200502) as part of the 2005 Docket Cycle to change the subject parcels from Limited Open Space to General Commercial. The Planning Commission unanimously recommended that the City Council not docket this application as part of the 2005 Docket. (The commissioners found that the application was not consistent with various goals and objectives of the comprehensive plan, specifically the applicant did not adequately address impacts to the capital facilities plan identify revenue sources to maintain the city's adopted level of service standards.) The applicant did not review the entire Monroe Comprehensive Plan and identify goals, objectives, and policies that may be in conflict with the proposed amendment.

In 2006, the city considered docketing the area for a sub-area plan (CPA2006C). Staff developed a detailed scope of work with cost estimates for professional services. Due to the budget required to adequately plan for the area and address environmental issues, the city did not move forward with the proposal.

2. Does the proposed amendment advance the goals and policies of the comprehensive plan?

**Analysis:** No, as noted, overall the proposal is not consistent with the goals and policies Comprehensive Plan.

3. Is the proposed amendment consistent with the goals and regulations of the Growth Management Act?

**Analysis:** As noted, the GMA statute requires more than infill development, but also requires planned growth, the reasonable availability of public services, protection of natural resources, and preservation of agricultural lands.

4. The relationship of the proposed amendment to other city codes and regulations?

**Analysis:** As noted, the proposal created inconsistencies with the Transportation Plan and Shoreline Master Plan, including allowed uses. The projected growth for the sewer, water, and stormwater plans did not project additional intensive commercial development or outline capital improvements to provide service.

5. The cumulative effect of all the plan amendments?

**Analysis:** Resolution 2005/006 provides the review criteria to evaluate proposed Comprehensive Plan amendments. As submitted, the proposed comprehensive plan amendment would create a significant change to the future land use projections made throughout the current Comprehensive Plan and affect several plan elements and supplemental planning documents. The area has all defined critical areas within its boundaries and lacks major public services, such as public water and sanitary sewer. The proposal would necessitate the expansion of numerous public facilities into a largely undeveloped agricultural area.

**Operations**

1. The change in land use designation will have currently unknown impacts on the water and sanitary sewer systems. The current system plan we based on the current land use designation of the property. The applicant must determine the possible impacts of the proposed land use designation change.
2. SEPA B.1.d. There are numerous surface indications of unstable soils in the vicinity.
3. SEPA B. 3.a.5. The subject property is within a flood hazard area (100-year flood plain) based on best available information. Flood Insurance rate map panel 13776 revised preliminary 1/12/2007.

If you have any questions, please contact Associate Planner Russ Wright at (360) 863-4553 or [rwright@ci.monroe.wa.us](mailto:rwright@ci.monroe.wa.us).

Best Regards,



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