



STATE OF WASHINGTON

DEPARTMENT OF COMMUNITY, TRADE AND ECONOMIC DEVELOPMENT

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November 2, 2007

Mr. Rick Cisar
City Planner
City of Sultan Planning Department
319 Main Street Suite 200
Post Office Box 319
Sultan, Washington 98294-1199

RE: Proposed amendments to the 2004 comprehensive plan, including revisions based on hearings board appeal

Dear Mr. Cisar:

Thank you for sending the Washington State Department of Community, Trade and Economic Development (CTED) the proposed amendments to the City of Sultan's comprehensive plan. We received your request for a 60-day review on September 4, 2007.

We recognize the substantial investment of time, energy, and resources that these documents represent. You and the City of Sultan's Planning Commission deserve praise for the work you are doing to plan for the future. The proposed amendments are a substantial improvement over the 2004 comprehensive plan. The proposed plan has a great deal of information. Most of it is easy to read and understand. The chapter pertaining to parks and recreation is particularly good. The proposed amendments present a comprehensive and thoughtful plan for Sultan's future.

We limited our review to just the proposed amendments that you sent us. The document we reviewed was the paper copy of the City of Sultan comprehensive plan that was published in August 2007. Each element in the proposed amendment was considered one by one. We assume each element has all the necessary information it needs. Our review does not address the 2004 comprehensive plan.

We have some concerns that we request you address before adopting the proposed amendments. Please consider the following:

Clarify the Intent of the Proposed Amendments

It is unclear if these amendments replace the entire 2004 comprehensive plan or just several of its elements. The cover letter from Mayor Tolson indicates the amendments "update" the City of Sultan's 2004 comprehensive plan. The amendments seem more than an update. They replace most of the 2004 comprehensive plan. The 2004 comprehensive plan contains fourteen elements. The proposed amendments address ten of these elements. Parts of the remaining four elements (shoreline, design resources, critical facilities and implementation) are discussed in the amendments. Portions of the chapter in the 2004 comprehensive plan

regarding existing conditions are replaced by the amendments. Finally, the format of the amended comprehensive plan is substantially different than the format used in the 2004 comprehensive plan.

We suggest the proposed amendments be expanded to include all the sections of the 2004 comprehensive plan and, thereby, completely replace the 2004 comprehensive plan. Some additional sections of the 2004 comprehensive plan may need to be revised and transferred to the amended document.

Identify the Density and Capacity of Designated Land Uses

The Land Use Element must include “areas and densities sufficient to permit the urban growth that is projected to occur in the county or city for the succeeding twenty-year period” [see RCW 36.70A.110 (2)]. Most cities provide this information through a table that list the total area of the city by each allowed, designated land use. The table on page 161 in the “Existing Conditions” of the 2004 comprehensive plan is a partial example. The table should also include the planned density or intensity of each designated land uses. This information enables the total acreage to be converted into the total capacity of each designated land use. It is then compared to the total acreage and capacity of developed land. The difference is the amount of land available for development in Sultan. Much of this information is found in the Snohomish County Buildable Lands Report. We suggest you include tables in the land use element of your proposed amendments that summarizes this information.

Inventory and Analyze Existing and Projected Housing Needs

As stated on page 32, a Housing Element must include an inventory and analysis of existing and projected housing needs. By definition, an inventory is a detailed list of housing. It should provide information to meet another statutory requirement – showing where land exists to meet future housing needs. We suggest you expand the table on page 35. The table should compare the total number of built housing units to the total capacity of each residential land use. The difference is the capacity of each land use designation for future housing. Counting the number of multifamily and single-family dwelling units is also recommended. This information shows the extent to which Sultan provides housing for all the economic segments of its community. Most of this information is available in the Snohomish County Buildable Lands Report and the Year 2000 Census.

Disclose Funding Sources in the Capital Facilities Plan

A statutory requirement of the capital facilities plan is to clearly identify sources of public money for new capital facilities [see RCW 36.70A.070 (3)]. Table VIII-1 and Table VIII-2 do not show the source of funding for all the proposed projects. Table VIII-1 does not include funding sources. Table VIII-2 includes funding sources only for water and sewer utilities. The funding sources for transportation are listed on Table VIII-3, which do not agree with the totals in Table VIII-2. We suggest these tables be revised to include the source of funds for each section of the table.

Show Impact fee Amounts and the Projects They will Fund

The requirement to show funding sources is particularly important to projects funded with impact fees see [RCW 82.02.050 (4)]. The capital facilities plan must address deficiencies in public facilities. It needs to show how these deficiencies will be eliminated within a reasonable period of time. It needs to show how it proposes to fund additional public facilities to serve new developments. These are the statutory requirements of capital facility plans that include impact fees.

The City of Sultan charges impact fees for parks, transportation and schools. The proposed capital facilities plan does not appear to include enough information to justify these impact fees. For instance, the element for

parcs and recreation indicates Sultan currently has a deficiency of parks relative to its level of service (see page 108). The city charges an impact fee of \$3,415 per new housing unit (see page 110). However, Table VIII-2 indicates the city does not plan to make any park and recreation improvements over the next six years (see page 144). The proposed Capital Facilities Element does not show how it proposes to spend the impact fees it collects.

A similar situation applies with the sections pertaining to transportation and schools. Impact fees for system improvements can be expended only in conformance with the capital facilities plan of the comprehensive plan [see RCW 80.02.070 (2)]. Since Table VIII-2 does not include the funding sources for transportation or school projects, the capital facilities plan has limited value relative to justifying these fees.

We suggest the tables in Chapter VIII – Capital Facilities and Public Services be revised to include funding sources for all the projects. We also suggest a separate section that focuses just on impact fees. This section should explain how they were determined, the amounts and standards for level of service.

Establish a Process to Site Essential Public Facilities

Sultan must show how it plans to site essential public facilities [see RCW 36.70A.200 (1)]. Claiming no essential public facilities are foreseen in the future is not enough. Sultan's comprehensive plan needs to outline a procedure or criteria to site essential public facilities. The City of Lynnwood has an excellent example in their comprehensive plan. Lynnwood's process is connected to the Snohomish county-wide planning policies, which also apply to Sultan. We suggest reviewing the proposed amendments be revised to include a process or plan to site essential public facilities.

We also have a few other suggestions that we think might improve Sultan's comprehensive plan. These suggestions are based on reviews of several dozens of comprehensive plans each year. It is also based on discussions with planners and planning commissioners from all over the state. You might want to consider the following ideas and suggestions in your proposed amendments.

Chapter II – Land Use:

The Land Use Element is required to present the city's planning assumptions see RCW 36.70A.070. These assumptions are typically the city's projected population, number of housing units and jobs over a twenty-year period. The proposed land use element includes information about population but not housing or jobs (see page 11). We find it helpful when cities include a table in their Land Use Element that summarizes targeted population, housing and jobs. Some cities include this table in each element of its comprehensive plan as a common land mark that ties the plan together. For instance, the following table was derived from the data in the Snohomish County 2007 Buildable Lands Report. The figures for housing were computed using the average household size in the Year 2000 Census.

Sultan UGA	2006 (actual)	2025 (targets)
-- Population	4,785	11,643
-- Housing	1,720	4,650
-- Jobs	1,010	2,093

Chapter III – Economic Development

The Economic Development Element of comprehensive plans is statutorily required to have the following three components:

(a) Summary of the local economy.

The proposed amendment has some text about Sultan’s resident labor force. We suggest the element also include the number and types of jobs located in and around Sultan. For instance, the following table was derived from data available from the Puget Sound Regional Council (PSRC) and the Year 2000 Census. We present it as a sample of the type of information that may be useful. It shows how Sultan has a very diverse labor force with the potential to attract various types of businesses to Sultan. Information from the Land Use Element should show where these new businesses and jobs might locate in Sultan.

Industry	Jobs Located in Sultan¹	Sultan’s Labor Force²
--manufacturing	12%	20%
-- WTCU	7%	5%
-- Retail	22%	11%
-- FIRES	24%	6%
-- Govmt/Educ	34%	26%
-- Other		32%
Source:		
1. Puget Sound Regional Council Employment Forecast		
2. U.S. Census 2000 Summary File 3, “Industry for the Employed Civilian Population 16 Years and Over”, City of Sultan, Table P49		

(b) Identify the weaknesses and strengths of the local economy.

A large portion of the proposed amendments to the Economic Development Element focuses on population and employment multipliers. Multipliers are a macro-economic analytical tool with limited value or utility at the micro-economic or local level. They are difficult to use in forming the public policies of small towns. We suggest Sultan focus on the strengths and weaknesses of its local economy, which may become obvious through an analysis of local data. For instance, the following observations can be drawn from the Year 2000 Census.

- Strength: Sultan has a large labor force consisting of approximately 75 percent of its adult population over the age of 16 years.
- Strength: Sultan’s employment base and resident labor force are engaged in a wide range of different jobs and occupations. Approximately 50 percent of the resident labor force has post high-school educations with nearly 20 percent possessing college degrees.
- Strength: Sultan has affordable housing compared to rest of Snohomish County.
- Weakness: A large portion of Sultan’s income base is spent on commuting costs. The average worker in Sultan commutes approximately 60 miles per day. The cost of commuting represents approximately 12 percent of Sultan’s total income base.
- Weakness: Approximately 55 percent of Sultan’s households spend 35 percent or more of their household income on mortgage or rental payments, which is an indication of excessive housing costs.

(c) Goals and policies that foster economic growth.

The goals and policies in the proposed amendments are quite good. They will surely promote economic growth in Sultan. However, they can be strengthened by basing them on tangible, local data. For instance, a conclusion drawn from the above data is that Sultan needs to reduce its housing and commuting costs in order to increase its local economy's income base. It may need to correct the existing imbalance in its jobs-to-housing ratio.

Sultan currently has approximately 1,010 jobs and 1,720 households which equates to a 0.58 jobs/housing ratio. Sultan will need approximately 700 jobs to correct its current imbalance and approximately 3,650 jobs to maintain a balanced jobs-to-housing ratio by the year 2025. In conjunction with providing space for new jobs, Sultan might want to focus on land uses that promote affordable, work force housing. The success of its economic development plan could be measured by the reduction in percentage of Sultan's income base spent on commuting costs.

Although the above analysis is very rough, it shows how more specific data can provide a sense of scale to the economic needs of Sultan. Subsequently the goals and polices in the economic development element of the comprehensive plan have a greater sense of direction. We suggest the proposed amendments to the economic development element be revised to include more factual data about Sultan's local economy. A great deal of information is readily available. Sources include the U.S. Census Bureau, PSRC and the Snohomish County's 2007 Buildable Lands Report.

Chapter V – Transportation

We suggest that you request PSRC certify your proposed amendments. The legislation creating Regional Transportation Planning Organizations was adopted with the Growth Management Act (GMA). It mandates that PSRC certify that the Transportation Elements in local comprehensive plans are consistent with regional transportation plans (RCW 47.80.023). Guidelines are available at: psrc.org/projects/planreview/process.pdf. Certification of local Transportation Elements is also a requirement for jurisdictions that intend to apply for funding available through the federal Transportation Equity Act for the 21st Century (TEA-21).

Chapter VI – Natural Environment

The GMA states the Land Use Element must include information pertaining to drainage, flooding, storm water run-off [see RCW 36.70A.070 (1)]. The element pertaining to the natural environment addresses these concerns, at least partially. Chapter F – Existing Conditions in the 2004 comprehensive plan has detailed information about these topics (see pages 130-144) along with mitigating actions. We suggest incorporating some these sections in the 2004 comprehensive plan into the proposed amendments. We suggest, at the very least, specific sections pertaining to drainage, flooding and storm run-off.

Chapter VIII – Capital Facilities and Public Services

The proposed amendments appear to combine the "Public Services", "Utilities", "Private Utilities" and "Critical Facilities" elements in the 2004 comprehensive plan into one chapter. These combined elements are then merged into the element pertaining to the improvement of capital facilities. As a result, we found the section pertaining to Sultan's capital facilities plan difficult to understand. We suggest you separate the capital facilities plan and the section pertaining to public facilities into separate chapters.

Appendices

The document includes a couple of documents in the appendices that is confusing and, in some cases, contrary to the proposed amendments. For instance:

- Appendix D includes Ordinance No. 942-06, an ordinance adopting an amended and updated Capital Facilities Element. The Central Puget Sound Growth Management Hearings Board found this particular ordinance was “clearly erroneous”. We understand you included it as a comparison to the proposed amendment. However, the cover page to “Appendix D” does not mention the attached ordinance is no longer valid and included solely for the sake of comparison. As a result, the attached ordinance may confuse the reader. We suggest you delete Ordinance No. 942-06 from the proposed amendments.
- Appendix G includes the City of Sultan’s Transportation Element. At the same time, Chapter V in the proposed comprehensive plan represents the City of Sultan’s Transportation Element. It is also referenced in “Appendix I” as a document adopted by reference. Since both documents are nearly the same, we suggest you delete Appendix G.

We think most of the problems Sultan has with its comprehensive plan is largely attributable to the presentation of its data. Both the 2004 comprehensive plan and the proposed 2007 amendments contain a great deal of very useful information. We hope you find these suggestions helpful in how to present it.

Congratulations to you, your staff and Planning Commission for the hard work these amendments embody. If you have any questions or concerns about our comments, or about any other growth management issues, please call me at (360) 725-3051.

We extend our continued support to the City of Sultan in mutual endeavor to achieve the goals of successful growth management.

Sincerely,



F.W. “Bill” Mandeville, AICP
Growth Management Planner
Growth Management Services

BM:lw

cc: The Honorable Ben Tolson, Mayor of Sultan
Deborah Knight, City Administrator
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