



May 9, 2023

Angela Gemmer
Community Development
City of Marysville
501 Delta Avenue
Marysville, WA 98270

51st AVE REDESIGNATION & REZONE (KM CAPITAL) – ADDITIONAL CONSIDERATIONS

Dear Angela,

After the Planning Commission meeting on April 25, 2023, you requested we provide more information in support of the proposed rezone. Note that the Arlington-Marysville Manufacturing Industrial Center (“AMMIC”) is also known and referred to as the Manufacturing Industrial Center (“MIC”) and Cascade Industrial Center (“CIC”), which terms have been used in various reports, studies, and marketing materials to refer to the same area. To maintain accuracy with the source in which the information herein was obtained, all of the terms used in this letter are as they were used in the source document.

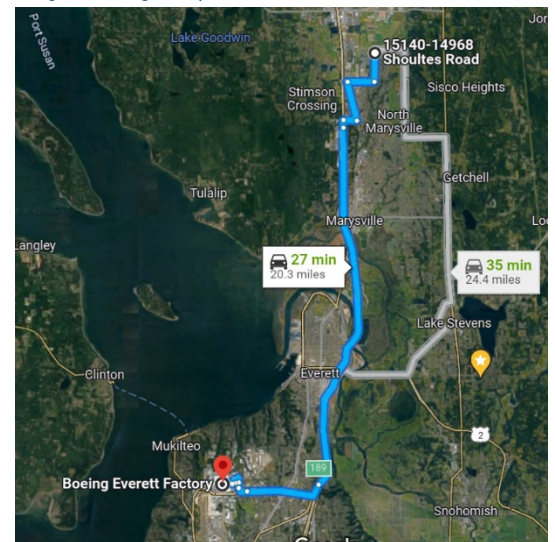
Additional Considerations for the Rezone:

The following are additional considerations that the Applicant respectfully requests be considered in review of its requested rezone:

1. Creates a Better Boundary for Truck Traffic. The rezone will help limit the amount of truck traffic that travels south on 51st Avenue past Shoultes Elementary School. If the ±40.8 acres were to develop as industrial, there would be at least one vehicle access point required on 51st Avenue, supporting the ingress and egress of trucks to/from 51st Avenue. The current industrial development anticipated on the rezone site would generate 95 total daily truck trips, whereas apartments would generate zero.

Image 1 shows Google Maps directions from the rezone site to Boeing, indicating in both the AM & PM peak hours that GPS directions are very likely to direct trucks south on 51st Avenue, past Shoultes Elementary School, to access Interstate-5 at 116th.

Image 1 - Google Maps Directions



2. Has Limited Impact to Total Industrial Acreage. The proposed rezone is ±40.8 acres; however, the actual net impact to land included Marysville’s portion of the AMMIC is only ±30.62 acres because ±10.18 acres was rezoned from R-4.5 Single Family Medium Density zoning on March 2, 2022 (Ordinance 3211). Based on the original report and recommendation by the PSRC in 2019, the total area for the AMMIC is 4,019 acres of which Marysville has 1,728 acres. The subject rezone of ±30.62 acres would impact less than 2% of the total area within Marysville and less than 1% of the overall acreage of the AMMIC.
3. Does Not Impact Rail Accessibility for Industrial Area. The rezone does not impact future rail availability to the remaining industrial areas. For rail to be available within the CIC, a spur would need to come off the existing line south of 152nd to limit impacts and conflicts with Edgcomb Creek and its new habitat mitigation corridor. However, both the Washington Utilities and Trade Commission (UTC) and City of Marysville would not permit an additional at-grade rail crossing on 152nd Street for safety concerns and because it is slated to be a 5-lane road.
4. Edgcomb Creek Restoration Not Affected. The rezone will not impact the completion of restoration of Edgcomb Creek and future development would be required to be consistent with the established mitigation corridor and buffers established by the NorthPoint development agreement.
5. Supports Alternatives to Single Occupant Vehicles. The rezone will locate workforce housing along an established transit corridor and will have future connectivity to the employment center via sidewalks along 51st Avenue, 152nd Avenue, the

future 59th Avenue, and a north-south multi-use trail adjacent to the relocated Edgecomb Creek and its habitat mitigation corridor.

Applicant's Rezone Consistent with Marysville Comprehensive Plan

The following analyzes the rezone's consistency with the Marysville Comprehensive Plan:

LU-20 Housing densities should be determined by community values, development type and compatibility, proximity to public/private facilities and services, immediate surrounding densities, and natural system protection and capability.

Applicant: The proposed rezone would establish multifamily, workforce housing opportunities along a transit corridor and adjacent to a developing employment center.

LU-24 Distribute higher densities in appropriate locations. Locate in residential areas where they will not detract from the existing neighborhood character. Locate near employment and retail centers, and to transportation corridors as appropriate.

Applicant: The proposed rezone would establish multifamily, workforce housing opportunities along a transit corridor and adjacent to a developing employment center.

LU-30 New or expanded single and multi-family development should be within walking distance, preferably, but not necessarily, via paved sidewalk or improved trail of a neighborhood park, public recreation area, or in some cases a school. Existing single and multi-family areas should, as possible, also be provided with a neighborhood park, public recreation area, or in some cases a school, within walking distance, via paved sidewalk or improved trail.

Applicant: The proposed rezone would establish multifamily, workforce housing adjacent to an employment center and within walking distance of sidewalks, a future multi-use trail corridor, and existing recreation (on-site open space required, as well as nearby parks).

LU-34 Locate and design new single and multi-family residential developments, and improve existing ones, to facilitate access and circulation by transit, car/van pools, pedestrians, bicyclists, and other alternative transportation modes.

Applicant: The rezone site is currently served by Community Transit route 202. The closest existing stop is located at 51st and 146th ST NE (stops 699 and 1173). Route 202 runs between the Smokey Point Transit Center on Smokey Point Boulevard near State Route 531 and the Lynnwood Transit Center with seven buses arriving at Stop 1173 between 5am and 9am weekdays and five buses heading north that arrive at Stop 699 between 5pm and 8pm on weekdays. The proposed rezone would allow for multifamily development near an employment center and where access and circulation between the residences and employment opportunities can be facilitated by future transit, car/van pool, and pedestrian/bicycle improvements that are part of existing and future development plans.

LU-46 Locate multi-family development adjacent to arterial streets, along public transportation routes, and on the periphery of commercially-designated areas, or in locations that are sufficiently compatible or buffered from single family areas to not disrupt them.

Applicant: The proposed multifamily rezone is located on arterial streets; along public transportation routes; is on the periphery of the employment center; and will be buffered from single family areas by critical areas and buffers, as well as a railroad track.

HO-8 Provide for a wide range of housing choices in residential and commercial zones, including, but not limited to cottages, townhouses, planned unit developments and apartments.

Applicant: The rezone will provide for needed workforce housing via apartments.

HO-18 Provide affordable housing opportunities close to places of employment.

Applicant: The rezone will provide for affordable workforce housing (apartments) close to future employment within the employment center.

HO-19 Consider the location of traffic routes, transit, bike and pedestrian trails, in locating new housing.

Applicant: The rezone will locate apartments at the intersection of two arterials (51st Avenue and 152nd Street), will be connected to the employment center via sidewalks and a multi-use trail, and will be served by existing transit

routes.

HO-33 Work with Community Transit to develop transit connecting dispersed housing and employment centers.

Applicant: The rezone site is currently served by Community Transit route 202. The closest existing stop is located at 51st and 146th ST NE (stops 699 and 1173). The employment center is planned to have additional transit added as it develops.

HO-36 Promote a housing policy and land use pattern that balances the ratio of housing units to jobs.

Applicant: The rezone creates needed housing options (workforce apartments) adjacent to an employment center. This will reduce commutes and allow for connectivity between denser residential development and employment opportunities.

HO-37 Maximize the public investment in public infrastructure by supporting a compact land use strategy to increase residential density.

Applicant: The rezone locates residential density where public infrastructure is already being expanded by public and private investments. Further, it leverages these investments by locating dense workforce housing adjacent to an employment center.

Proposed Rezone is Consistent with AMMIC Subarea Plan & Marysville's Comprehensive Plan

The following outlines how this proposed rezone to R-18 Multi-family Medium Density is consistent with the MIC Subarea Plan

- Assets, Page 6: "Location Near Affordable Workforce Housing"

Applicant: Of the six key assets identified in the AMMIC subarea plan, proximity to affordable workforce housing was identified by existing MIC businesses as both a key asset *and need*. In other words, local businesses and stakeholders participating in the planning of the MIC acknowledged that as the MIC grows in attracting jobs, the creation of additional affordable workforce housing would be needed. The rezone to R-18 supports the creation of affordable workforce housing.

- AMMIC Policies ED-4 and ED-4.1 directly address the key role of the housing needed to support the AMMIC:

AMMIC-ED-4: Marysville sustains a high quality of life that supports the economic competitiveness of the AMMIC.

AMMIC-ED-4.1: Ensure that City zoning and plans allow a variety of housing opportunities and types to provide a broad range of housing choices to the local workforce.

Applicant: The proposed rezone would create additional multifamily housing immediately adjacent to future industrial development, creating opportunities for people to walk or balk to work, as well as access transit. This rezone ensures that the area adjacent to the AMMIC provides a variety of housing opportunities that meet the needs of the growing local workforce.

- The following policies from the AMMIC Subarea Plan and the Comprehensive Plan ("CP") address the amount of land in the AMMIC for industrial purposes, as well as incompatible uses:

AMMIC-LU-1.5: Protect industrial lands from encroachment from incompatible uses and development on adjacent land.

LU-177 (CP) Ensure at least a minimum of 80% of the property within the MIC is planned and zoned for industrial and manufacturing uses. Compatible non-industrial uses shall be conditioned to mitigate for potential conflicts with current and future land uses.

LU-178 (CP) Protect industrial lands from encroachment from incompatible uses and development on adjacent land.

Applicant: Applicant's proposed rezone impacts less than 2% of the total land within Marysville's portion of the AMMIC. This allows the city to continue to comply with its Comprehensive Plan Policy (LU-177) which seeks to ensure a minimum of 80% of the property within the MIC is planned and zoned for industrial and manufacturing uses.

The subject parcels proposed for the rezone are already located adjacent to residential uses, including R-18 to the west, R-4.5 to the south, and R-4.5 to the east (partial). The proposed rezone would create a more logical boundary of the AMMIC area at 152nd (a future 5-lane roadway) which reduces the amount of industrial and manufacturing lands bordering single family residential areas.

No Affect on PSRC's Designation of the Cascade Industrial Center (CIC)

The PSRC's Administrative Procedures for Regional Centers (including Manufacturing/Industrial Centers), the PSRC recognizes that boundaries may need to change over time and the proposed rezone would qualify as a minor amendment, which description and criteria is as follows:

B. Center Boundary Changes. Center boundaries should follow parcel boundaries and splitting parcels should be avoided. Boundaries should not appear gerrymandered or irregular, and centers should be contiguous areas. Inclusion of non-contiguous parcels is discouraged. Center boundaries may be refined as subarea planning occurs, but boundary changes can have implications for the overall configuration and make-up of the center.

1. *Minor boundary changes include one or more of the following that increases or decreases the center boundary by less than 10%:*
 - a. *Adjustments that better follow geographic features or topography. These may include fixing mapping errors from previous plans.*
 - b. *Adjustments that result from changes to rights-of-way or property line adjustments.*
 - c. *Adjustments based on updated subarea planning and development opportunities. Minor boundary changes are processed administratively by providing PSRC staff with an updated GIS shapefile and explanation of changes.*

Applicant: Applicant's proposed rezone impacts less than 1% of the total area designated within the AMMIC. Further, the rezone would create a boundary change that follows better geographic features by using 152nd as the new southern boundary between 51st Avenue and the railroad track.

As noted in B.1.c above, this adjustment would be processed administratively by PSRC because it does not substantively impact the area's designation.

Further, According to PSRC's official May 30, 2019 Regional Manufacturing/Industrial Center Designation Report, the Cascade Industrial Center as a Manufacturing Industrial Center significantly exceeded the minimum designation requirements:

- A minimum of 2,000 acres – the AMMIC has 4,019 acres
- A minimum of 4,000 existing jobs – the AMMIC had 7,773 jobs as of 2017
- A minimum of 10,000 jobs planned – the AMMIC planned for 20,000 jobs by 2040 with total capacity for 24,800-32,700 total jobs
- At least 50% of the employment must be from industrial jobs – as of 2016, 80% of jobs in the AMMIC were industrial jobs
- At least 75% of the area must be zoned for core industrial uses – over 81% of the AMMIC area was zoned for core industrial uses

Applicant: Again, as noted previously, the proposed rezone does not negatively impact the CIC's regional designation or put at risk any investments previously made in the employment center. In fact, adding this multifamily density adjacent to the employment center will help support growth in the employment center, reduce/limit commutes, and maximize investments in public infrastructure such as sidewalks, transit, etc.

We trust this additional information is helpful as the city analyzes the proposal.

Thank you,



David Toyer
President