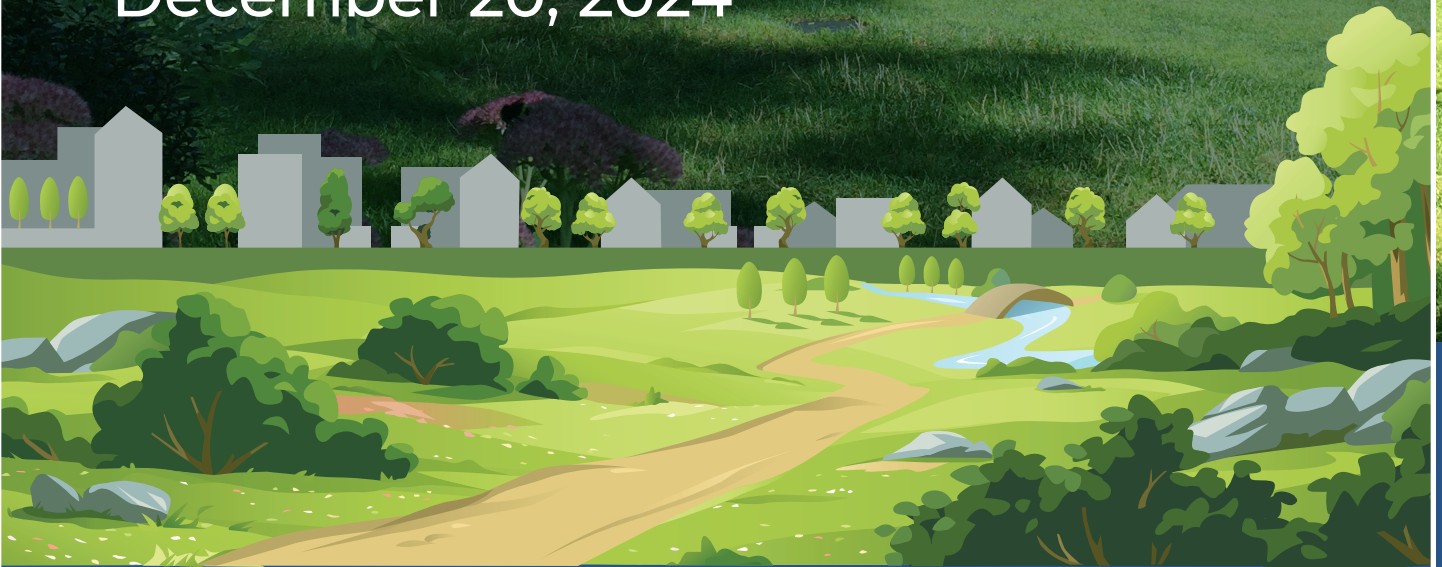


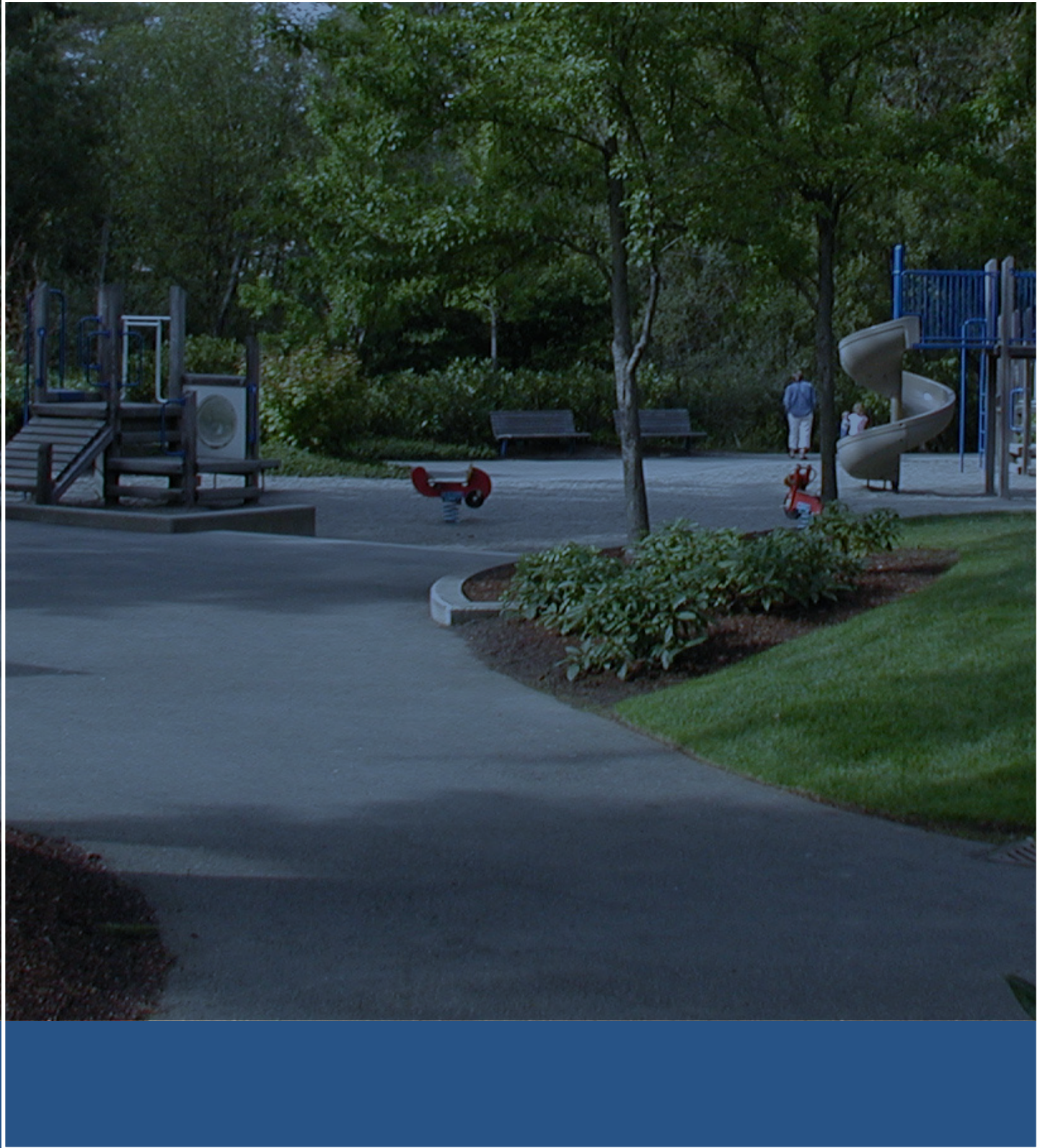
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# MILL CREEK COMPREHENSIVE PLAN



2024-2044  
December 20, 2024







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## Mill Creek Planning Commission

- » Matthew Nolan, Chair
- » David Hambelton, Vice Chair
- » Alan Abrams
- » Benjamin Briles
- » Jose Borunda
- » Matthew Geiger
- » Jennifer Schulte

## Mill Creek Staff

- » Martin Yamamoto, City Manager
- » Mike Todd, Director of Public Works
- » Jeff Ryan, Director of Community Development and Planning
- » Jody Hawkins, Communications, Marketing, & Recreation Manager
- » Dan Carmody, City Engineer
- » Sybil Tetteh, Senior Planner
- » Justin Horn, Planner

## Consultants

- » Otak, Inc.
- » Leland Consulting Group
- » Transpo Group
- » LDC
- » Kimley-Horn

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## ACRONYMS

**ACS** – American Community Survey

**ADA** – Americans with Disabilities Act

**ADU** – Accessory Dwelling Unit

**AMI** – Area Median Income

**AWWD** – Alderwood Water & Wastewater District

**BFE** – Base Flooding Elevation

**BMX** – Bicycle Motorcross

**BP** – Business Park

**BRT** – Bus Rapid Transit

**CB** – Community Business

**CETA** – Washington State Clean Energy Transformation Act

**CHAS** – Comprehensive Housing Affordability Strategy

**CIP** – Capital Improvement Plan

**COA** – Critical Areas Ordinance

**CPP** – Countywide Planning Policies

**CPTED** – Crime Prevention Through Environmental Design

**CT** – Community Transit

**CWA** – Clean Water Act

**CWSA** – Clearview Water Supply Agency

**D.U.** – Density Units

**EGUV** – East Gateway Urban Village

**EIS** – Environmental Impact Statement

**ENV** – Environment

**ESA** – Endangered Species Act

**FGTS** – Freight and Goods Transportation System

**GED** – General Educational Development

**GMA** – Growth Management Act

**GPM** – Gallons per Minute

**HB** – House Bill

**HDR** – High Density Residential

**HOA** – Homeowners Association

**HUD** – US Department of Housing and Urban Development

**IRP** – Integrated Resource Plan

**KCWTD** – King County Waste Treatment Division

**LCA** – Land Capacity Analysis

**LDR** – Low Density Residential

**LID** – Local Improvement District

**LOS** – Level of Service

**LU** – Land Use

**MCMC** – Mill Creek Municipal Code

**MDR** – Medium Density Residential

**MGD** – Millions of Gallons per Day

**MHI** – Median Household Income

**MPP** – Multicounty Planning Policies

**MUGA** – Municipal Growth Area

**NAICS** – North American Industry Classification System

**NPDES** – National Pollutant Discharge Elimination System

**OFM** – Office of Financial Management

**PCI** – Pavement Condition Index

**PDS** – Planning Development Services

---

**PHS** – Priority Habitat and Species  
**PPP** – Pavement Preservation Program  
**PRD** – Planned Residential Development  
**PROS** – Parks, Recreation, and Open Space  
**PSE** – Puget Sound Energy  
**PSH** – Permanent Supportive Housing  
**PSRC** – Puget Sound Regional Council  
**PUD** – Public Utilities District  
**RCW** – Revised Code of Washington  
**REET** – Real Estate Excise Tax  
**RSSH** – Regionally Significant State Highways  
**SCF** – South Snohomish County Regional Fire Authority  
**SEPA** – State Environmental Policy Act  
**SERS** – Snohomish County Emergency Radio Systems  
**SLWSD** – Silver Lake Water and Sewer District  
**SR** – State Route  
**TBD** – Transportation Benefit District  
**TC** – Town Center  
**TDM** – Transportation Demand Management  
**TIP** – Transportation Improvement Program  
**UTC** – Washington Utilities and Transportation Commission  
**WAC** – Washington Administrative Code  
**WDFW** – Washington State Department of Fish and Wildlife  
**WPCF** – Water Pollution Control Facility  
**WRIA** – Water Resource Inventory Area  
**WSDOT** – Washington State Department of Transportation

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# APPENDICIES

**Appendix A - City of Mill Creek Vision Survey Results (Otak, Inc.)**

**Appendix B - City of Mill Creek Middle Housing Menu of Options Report (LDC, Inc.)**

**Appendix C - City of Mill Creek Racial Equity and Displacement Analysis (LDC, Inc.)**

**Appendix D - Mill Creek Comprehensive Plan Racially Disparate Impacts  
Background Analysis (Leland Consulting Group)**

**Appendix E - Mill Creek Comprehensive Plan Land Capacity Analysis Methodology  
and Results with Adequate Provisions (Leland Consulting Group)**

**Appendix F - Mill Creek Comprehensive Plan Land Capacity Analysis for Emergency  
Housing (Leland Consulting Group)**

**Appendix G - Mill Creek Comprehensive Plan Goals and Policies Alignment Matrix**





# INTRODUCTION

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## Purpose of a Comprehensive Plan

Mill Creek's Comprehensive Plan is a foundational public policy document for the City, offering guidance for decisions made by elected officials and government staff. This plan covers several topics and establishes goals, policies, and actions designed to encourage cohesive growth between the years of 2024-2044. The plan is intentionally broad in scope, with a long-term perspective. It is comprehensive, covering all geographic areas in the city and key factors influencing its physical and economic development. It is general, as it provides an overview of major goals, policies, and actions for numerous topics, also known as elements. Furthermore, it is long-range, not only addressing present concerns, but also proactively considering potential future challenges and opportunities.

## Relationship of the Comprehensive Plan and the Mill Creek Municipal Code Zoning and Development Provisions

As enabled by the 1990 Washington State Growth Management Act, the Comprehensive Plan is a mandatory public policy document adopted by the Mill Creek City Council to guide decisions regarding the growth and development of the city over the next twenty years. The implementation of the plan occurs through the application of the City's zoning and subdivision regulations, Critical Areas Ordinance (CAO), transportation and capital improvement programming, and other official

controls intended to meet the goals and objectives of the plan. The Comprehensive Plan also guides City Council in decision-making where they have discretionary action. This Comprehensive Plan has been prepared pursuant to 35A.63 RCW and meets the requirements of the 1990 Washington State Growth Management Act, as amended. For more about this plan's consistency with the state, regional, and county planning frameworks, refer to the Appendix.



# Comprehensive Planning Process

The comprehensive planning process creates a blueprint for the City of Mill Creek, providing:

- » Citywide goals and policies;
- » Inventory and analysis of land use, housing, population levels, capital facilities, utilities, parks and open space, environmental features, and transportation facilities;
- » Understanding of key issues and interests of the community;
- » Identification of infrastructure and capital facilities implementation needs and projects to serve growth; and
- » Involvement of the public in the plan and policy-formulation process.



The planning process in our community is continual. It involves not only the formulation of the Comprehensive Plan document and implementation of various regulatory tools, but also continual monitoring and periodic updating. The success of the planning process relies heavily upon the City's ability to keep the major elements of the plan current. Thus, the plan should be updated regularly by the City, and such revisions should adhere to the various sequential stages in the planning process. RCW 36.70A.130 requires cities to update their Comprehensive Plan and development regulations every ten years.

## Mill Creek in 2044—Guiding Statement

Based on community engagement and input received on a citywide visioning poll (results summarized later in this chapter) as part of the planning process, the guiding statement shown on the next page represents the most important values of the community to guide future planning decisions and implementation through 2044.



# GUIDING STATEMENT

Mill Creek will continue to be a highly desirable place to live where distinctive neighborhoods are complemented by a dynamic Town Center and flourishing commercial and employment areas. The city will have well-maintained parks, recreational facilities, and open spaces, all contributing to a high quality of life for those living in, working in, and visiting the community. Mill Creek will be characterized by its beautiful setting, strong sense of public safety, and a unified, clean, and welcoming atmosphere.





## Mill Creek's Strategic Plan Vision

The City recently created a strategic plan and vision for City governance through 2040 that calls for the following priorities.

**Financial Health and Economic Vitality**—Mill Creek has multiple commercial hubs with a vibrant central core, enabling businesses to thrive, creating a destination for dining and shopping, and providing a stable economic base for City services. Mill Creek proactively funds the services that meet community needs and priorities. Mill Creek has enough money in reserves to strategically invest in the City and to cover unanticipated operating expenses.

**Safe and Clean**—In Mill Creek, safe and clean go together. Mill Creek is one of the safest and cleanest cities in Washington. Mill Creek's focus on public safety is an integral part of the community, ensuring active police presence and integrating appropriate technologies to keep the community safe. The Mill Creek community is engaged and committed to keep parks, trails, streets, public spaces, and private property safe and clean.

**Engaged and Connected Community**—Mill Creek is a connected community, tied together by trails, walking paths, and connecting sidewalks. Mill Creek and its residents actively support community events, which bring community members together. The City's multipurpose community facility and public spaces bring people together to connect, play, share, and enjoy life in Mill Creek. The people of Mill Creek are actively engaged in the community and committed to making it a great place to live.

**Well Maintained Outdoors, Public Spaces, and Infrastructure**—Mill Creek is recognized as one of the most walkable cities in Washington. Mill Creek's parks, trails, and public spaces are well maintained and accessible for all community members. Mill Creek's infrastructure is well maintained and trusted by community members.

# Summary of Community Engagement

Engagement efforts conducted during the planning process included open houses, tabling at events, an online survey, and other outreach. The following table outlines engagement efforts of the Comprehensive Plan update project. Results from the Open House and Community Visioning Survey are summarized on the next page as well.

TABLE 01.

## Comprehensive Plan Engagement Summary

EVENT/ENGAGEMENT	DESCRIPTION
<b>Open House</b>	<p>July 24, 2024, 3:30PM-5:00PM &amp; 6:00PM to 7:30PM</p> <p>In addition to members of the public, representatives from the following groups attended the open house:</p> <ul style="list-style-type: none"> <li>» Apple Tree @ Thomas Lake HOAs</li> <li>» Arts and Beautification Board</li> <li>» City of Mill Creek/Kiwanis</li> <li>» Mill Creek Community Association</li> <li>» Everett Public Schools</li> <li>» Parks and Recreation Board</li> <li>» Planning Commission</li> <li>» Hope Creek Charitable Foundation</li> </ul> <p>Outreach Efforts:</p> <ul style="list-style-type: none"> <li>» Two legal notices posted in the Everett Herald (07/12 and 07/19)</li> <li>» Email invitations to boards and commissions</li> <li>» Social Media (Instagram, Facebook, Twitter)</li> <li>» Resident Portal</li> <li>» City Calendar</li> <li>» City Events Page</li> <li>» City Press Release</li> </ul>
<b>Eggstravaganza Easter Egg Hunt</b>	<p>March 30, 2024, 10:30AM-12:30PM</p> <p>Project team distributed flyers to gather input via online survey</p>
<b>Tour of Nearby Cities by City Council Members</b>	<p>City Council members went together to Woodinville, Kenmore, and Bothell to study downtown development.</p>
<b>State of the City Lunch</b>	<p>April 24, 2024, 1:00PM-2:00PM</p> <p>Flyers were distributed at this event.</p>
<b>Attendance at Youth Advisory Board</b>	<p>May 29, 2024, 4:00PM-5:00PM</p> <p>Project team gave a presentation to Youth Advisory Board at their regularly scheduled meeting. A conversation regarding planning was facilitated with approximately forty high-school students.</p>
<b>Mill Creek Festival</b>	<p>July 13 &amp; 14, 2024, 11:00AM-6:00PM</p> <p>Flyers were distributed at this event.</p>

<p><b>Presentations to Councils, Boards, and Commissions</b></p>	<p>Joint meetings between City Council and Planning Commission occurred monthly between September 2023 and November 2024.</p> <ul style="list-style-type: none"> <li>» CC Meeting - April 11, 2023</li> <li>» PC/CC Joint Meeting - June 13, 2024</li> <li>» CC Meeting - November 28, 2023</li> <li>» PC/CC Joint Meeting - February 6, 2024</li> <li>» PC/CC Joint Meeting - May 7, 2024</li> <li>» PC/CC Joint Meeting - July 9, 2024</li> <li>» CC Meeting - September 24, 2024</li> <li>» PC/CC Joint Meeting - October 22, 2024</li> <li>» PC Public hearing – November 21, 2024</li> <li>» Public Hearing - November 26, 2024</li> <li>» Public Hearing - December 3, 2024</li> </ul> <p>The Planning Commission reviewed draft Comprehensive Plan content in their meetings from Spring through Fall 2024.</p>		
<p><b>Community Visioning Survey</b></p>	<table border="0"> <tr> <td data-bbox="553 730 943 999"> <p>Published online February – May</p> <p>107 total responses</p> </td> <td data-bbox="943 730 1468 999"> <p>Outreach Efforts:</p> <ul style="list-style-type: none"> <li>» Printed flyers at City Hall &amp; Library</li> <li>» Email distribution list</li> <li>» Millstream Newsletter</li> <li>» City Highlights Newsletter</li> <li>» Eggstravaganza</li> </ul> </td> </tr> </table>	<p>Published online February – May</p> <p>107 total responses</p>	<p>Outreach Efforts:</p> <ul style="list-style-type: none"> <li>» Printed flyers at City Hall &amp; Library</li> <li>» Email distribution list</li> <li>» Millstream Newsletter</li> <li>» City Highlights Newsletter</li> <li>» Eggstravaganza</li> </ul>
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## COMMUNITY VISIONING SURVEY RESULTS

From February through May 2024, the City conducted a community visioning survey to collect feedback from people across the community on a variety of topics. The survey results helped shape the guiding statement shown on page I-3. To ensure broad participation, the survey was promoted through multiple channels, including paper and electronic newsletters, direct outreach to interested individuals and groups, and by attending in-person events to gather input. For detailed insights and results from the survey, please refer to the Appendix.

## Visioning Survey Topics

- » Attributes that contribute to quality of life
- » Most important values
- » Perception of safety
- » Importance of public spaces being well-maintained and clean
- » Willingness to volunteer to help maintain public spaces
- » Interest level in engaging with the City of Mill Creek community
- » Interest level in different engagement activities

# Comprehensive Plan Framework and Organization



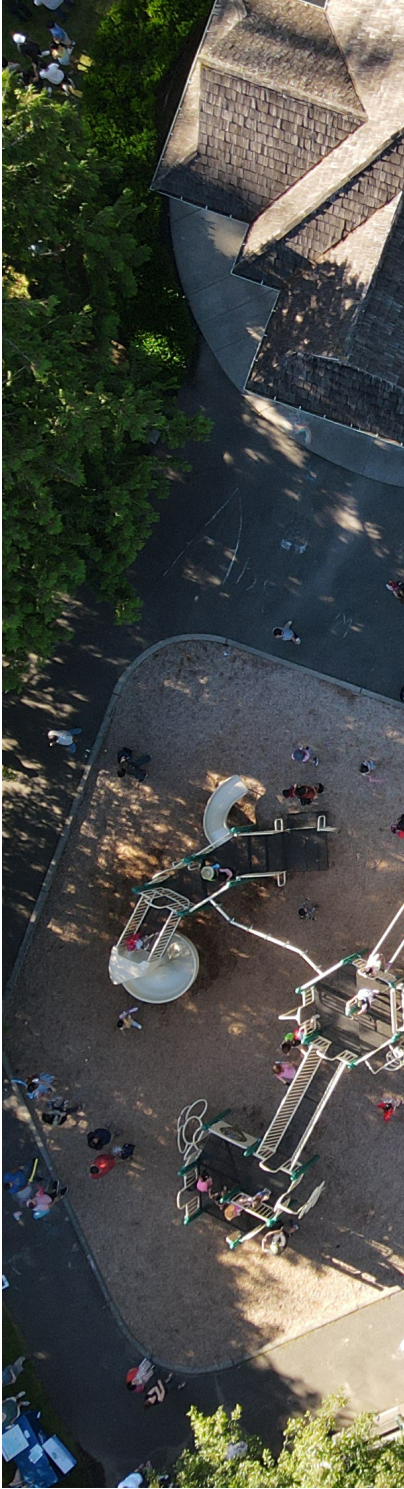
## Comprehensive Plan Elements

### LAND USE

The intent of the Land Use element is to provide a strategic framework for managing land development and growth. It outlines goals and policies that aim to achieve various objectives such as preserving natural resources, promoting economic development, enhancing quality of life, ensuring public safety, and fostering sustainable development. By defining land use patterns, designations, and regulations, the Land Use element helps guide decision-making regarding zoning, development standards, infrastructure investment, and the preservation of community character. It serves as a blueprint for shaping the physical environment and accommodating future needs while reflecting the values of the community. The Land Use element also provides a summary of the context and key priorities of the three subareas in Mill Creek—Town Center, East Gateway Urban Village, and South Town Center (formerly known as the Mill Creek Boulevard Subarea).

### HOUSING

The Housing element addresses the City's desire and responsibility to promote housing affordability, a diverse housing stock, and housing accessibility for all income levels and demographic groups. It also addresses issues such as housing stability, preservation of existing neighborhoods, maintaining neighborhood quality, and providing opportunities that assist in the development of affordable housing for low- and moderate-income families.



## **ENVIRONMENT**

The Environment element addresses the preservation, protection, and enhancement of natural resources, ecosystems, and environmental quality within Mill Creek. Using best available science, environmental features, such as wetlands, forests, water bodies, and critical habitats are identified, and policies are developed to conserve and manage these resources. The Environment element also includes goals, policies, and actions related to pollution prevention, climate resilience, energy conservation, and green infrastructure.

## **ECONOMIC VITALITY**

The Economic Vitality element outlines strategies to support and enhance the economic vitality of Mill Creek. It includes an analysis of current economic conditions, identifies key economic sectors, and assesses opportunities for growth and diversification. The Economic Vitality element aims to promote job creation, business retention and expansion, workforce development, and entrepreneurship. It also addresses issues such as infrastructure investment, land use planning to support economic activities, and partnerships with local businesses, educational institutions, and economic development organizations. Ultimately, the Economic Vitality element seeks to foster a resilient and thriving economy that improves the quality of life for residents and promotes sustainable community development.

## **PARKS, RECREATION, AND OPEN SPACE**

This element establishes policy direction for the continued provision of adequate park and recreation facilities to serve the community's existing and future needs, plus an evaluation of intergovernmental coordination opportunities to provide regional approaches for meeting park and recreational demand. This element is also used in conjunction with the Recreation Guide, which addresses the park system and its components, open space and recreational facilities, and capital improvement needs to secure grant funding for park improvements and/or land acquisition.

## TRANSPORTATION

The Transportation element guides the development of the city's transportation system to improve connectivity, walkability, efficiency, and public safety for people of all ages, abilities, incomes, and backgrounds while reducing potential environmental impacts. The Transportation Improvement Plan matches the Capital Improvement Plan (CIP), which identifies transportation improvement projects the City plans to build during a six-year window.

## UTILITIES

The Utilities element focuses on the provision, management, and sustainability of essential public utilities and services. Water supply, wastewater treatment, stormwater management, solid waste disposal, telecommunications, internet, and other infrastructure systems critical for community health and well-being are managed by this element. The Utilities element aims to assess current infrastructure conditions, identify future needs, and develop strategies to ensure reliable and efficient utility services. It may include policies and actions related to infrastructure maintenance, upgrades, expansion, and conservation, as well as considerations for funding mechanisms, regulatory compliance, and emergency preparedness. Collaboration with utility providers, government agencies, and community interests is integral to the development and implementation of the Utilities element to ensure alignment with community priorities and goals.

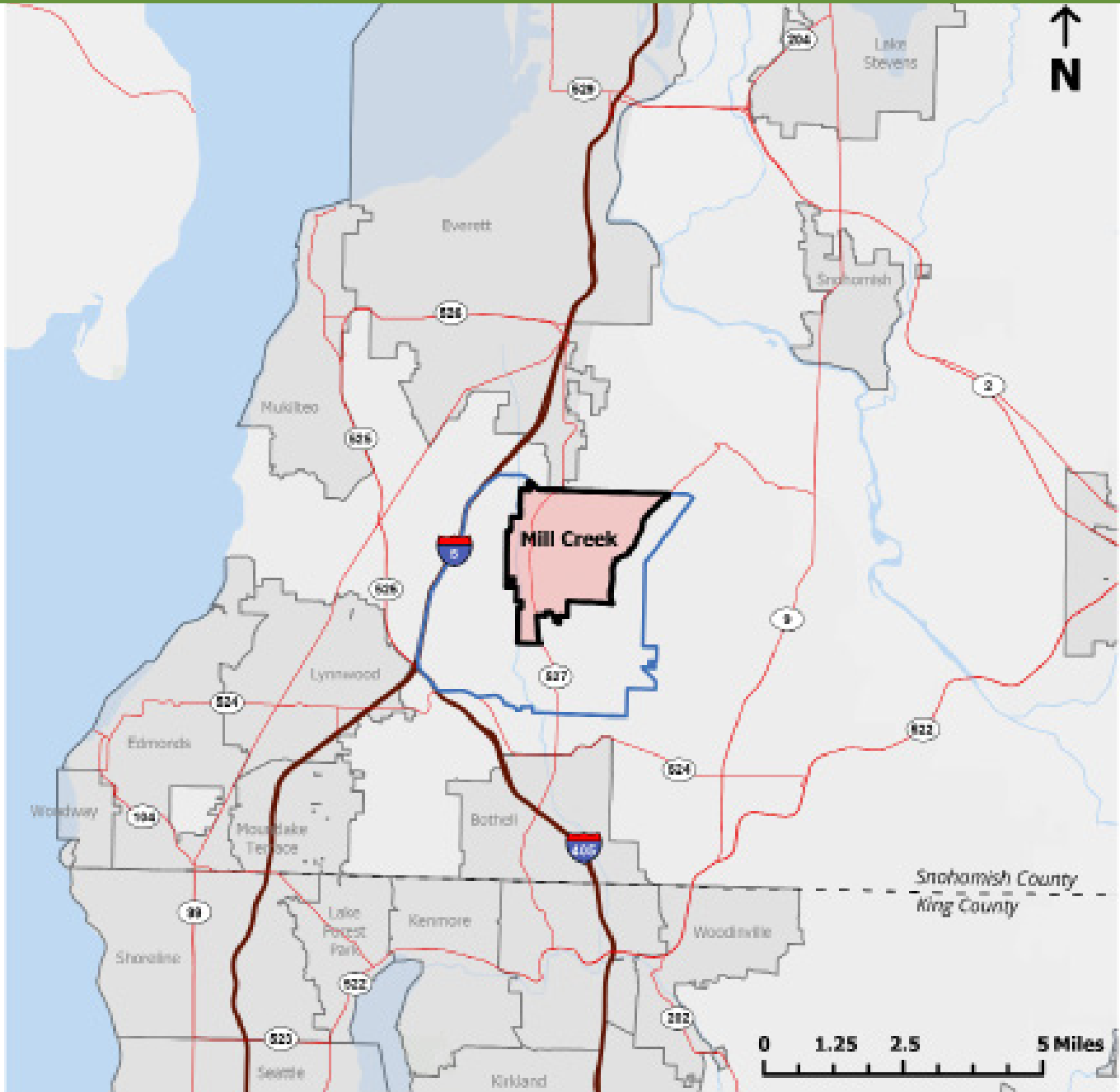
## CAPITAL FACILITIES

The Capital Facilities element addresses the provision, maintenance, and financing of essential public infrastructure and facilities. The element includes facilities such as roads, bridges, schools, parks, public buildings, utilities, and other infrastructure necessary to support the community's needs. The Capital Facilities element aims to identify future infrastructure needs based on anticipated growth, changes in demographics, economic development, and community priorities. The priorities identified in this element are incorporated into the six-year Capital Improvement Plan (CIP), which identifies specific capital projects in the categories of Parks, Transportation, Stormwater, and City Facilities. The CIP is adopted as a separate document and identifies specific capital improvement projects and funding sources, including park and traffic impact mitigation fees. The CIP is updated every two years in conjunction with the biennial budget and is adopted as part of the Capital Facilities element by reference.





FIGURE 01. **Local Vicinity**



- Interstate
- State Route
- County Boundary
- Mill Creek City Limits
- Mill Creek Municipal Urban Growth Area (MUGA)





# COMMUNITY PROFILE

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## Coastal Salish Lands

Since time immemorial, Coast Salish peoples have inhabited the region, and each tribe has a unique, historical connection to the land. The Coast Salish peoples include more than 40 independent Nations who inhabit a geographic territory that includes lands bordering the Salish Sea, stretching from northern Oregon to British Columbia. The Coast Salish speak more than 20 related languages and dialects. Tribes in the area where Mill Creek is now located originally spoke a dialect of the Lushootseed language.

## Mill Creek History

The Mill Creek area became inhabited by non-indigenous people in the early 20th century by numerous farming families, whose names influenced the local place. The construction of the Bothell-Everett Highway in 1913, as part of the Pacific Highway, led to the establishment of small stores and filling stations at junctions like Murphy's Corner and Wintermute's Corner.

In 1931, Dr. Manch N. Garhart acquired 800 acres of land in the area. He utilized this acreage for cultivating Gravenstein apples and Bartlett pears while also raising cattle. Dr. Garhart was known as a staunch naturalist who performed extensive inventories of the natural resources of the site and made numerous observations of wildlife and vegetation. The Garhart property was surrounded by several families on similar tracts (20-60 acres).

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In the 1960s and 1970s, the Garhart property, along with several neighboring farms, garnered the attention of various real estate developers as a prospective master-planned community, given its proximity to the recently completed Interstate 5. The Environmental Impact Statement (EIS) for the 1974 Mill Creek Planned Residential Development (PRD) describes the evolution of this land:

**In 1965 Northwestern Properties organized a series of partnerships which optioned and controlled approximately 3,000 acres. The principal owner was Mr. Elmer Kerns who purchased his ownership from Garhart on a real estate contract basis.**

**At this time a planned new community, to be called Olympus, was proposed. The Olympus plan was a forerunner of the present proposed new community. Basically, it differed from the current plans in terms of the land use layout, and also, an overall higher density of uses would have occurred than with the proposed project. The investigations for planning and financing were oriented toward federal participation. In the course of such investigations, the feasibility for obtaining such long-term assistance was diminished and alternate means were sought.**

**In 1968, Howard T. Harstad, a local consultant, agreed to take over the options and brought in Morrison-Knudsen interests to supply the required financial backing. At a critical point in the conception of the project one of the principals of the Morrison-Knudsen firm who had personally backed the venture on a corporate level met with a fatal airplane accident.**

**After a subsequent corporate review of the project status, the Morrison-Knudsen firm decided to withdraw their support and concentrate their resources on other ongoing ventures.**

**After the Morrison-Knudsen financial assistance was withdrawn, Harstad also divested his interest. During this time, the Boise Cascade Company had expressed an interest in taking over the project on a self-sufficient basis. The economic downturn in 1969 and 1970 due to a drastic reduction in aerospace employment caused Boise Cascade to abandon their plans and return control to the Kerns interests.**

**During the middle of 1973, Tokyu Land Development (Hawaii), Ltd., acquired control of the land through options (1,200 acres +) and assigned their interest to the United Development Corporation (with the Ohbayashi Corporation) who was at the time conducting planning and engineering studies, which resulted in a comprehensive master plan for the new community.**





In 1973, the consulting firm of Wilsey and Ham was commissioned to craft a master plan, which was subsequently presented to Snohomish County in January 1974. Amendments to the Comprehensive Plan followed in February and March, and the contract rezone was formalized in April. The implementation of restrictive covenants was accomplished in 1975.

The contract rezone by Snohomish County encompassed the comprehensive Master Development Plan. Over the course of the next eight years, all nine sector plans were devised and approved. The ultimate sector plan anticipated a citywide total of over 4,600 dwelling units, accommodating a population of 12,000 to 14,000 upon project completion. The Sector Plans were put into effect through the formulation of individual Division of Development Plans and Subdivision Plats.



# 1983

## CITY OF MILL CREEK IS INCORPORATED



The City of Mill Creek, originally spanning 1,160 acres, was officially incorporated on September 20, 1983, being approved by voters after a 453 to 324 vote. The primary motivation behind this move was the residents' pursuit of a more equitable tax structure and enhanced police protective services. As an unincorporated territory served by various entities, including the Alderwood and Silver Lake Water & Sewer Districts, the Everett School District, two fire districts, three telephone exchanges, and with a Bothell mailing address, the area lacked a distinct community identity. Following incorporation, the City Council was elected, and the Planning Commission was appointed. In 1987, the Parks and Recreation Advisory Board was established.

Since its incorporation in 1983, the City of Mill Creek has experienced substantial transformations. The city's territory has doubled in size due to multiple annexations. The majority of developable land within the City of Mill Creek has now been developed or is currently under construction. All sectors outlined in the original Mill Creek Master Plan have been realized. The completion of the Mill Creek Town Center in the early 2000s played a pivotal role in the city's economic landscape, enriching the overall quality of life.

Mill Creek Town Center played a pivotal role in the City's economic landscape

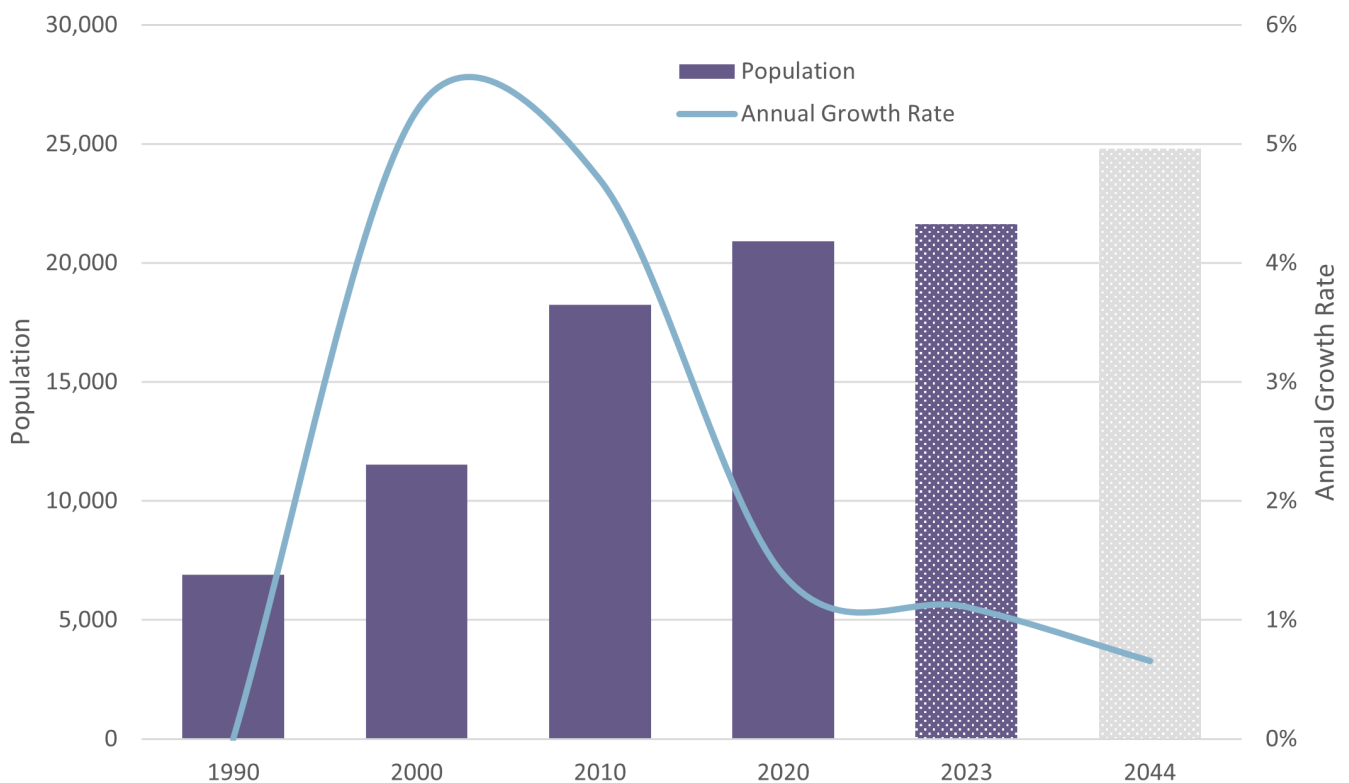


# Population Characteristics

Mill Creek was incorporated in 1983 and **grew rapidly** through the 1990s and 2000s due to annexations. The growth rate since 2010 has stabilized to **below 2 percent per year**, as shown below in Figure 1. The Office of Financial Management projects that Mill Creek will **grow to a population of 24,813 by 2044**, representing an average annual growth rate of 0.66 percent over the planning horizon, a slight decrease over the recent annual growth rate. The City must plan for **2,617 new housing units by 2044** to accommodate these new residents, according to growth targets developed by Snohomish County and the Department of Commerce.

FIGURE 01.

## Mill Creek Population and Growth Rate, 2000-2044 (Projected)



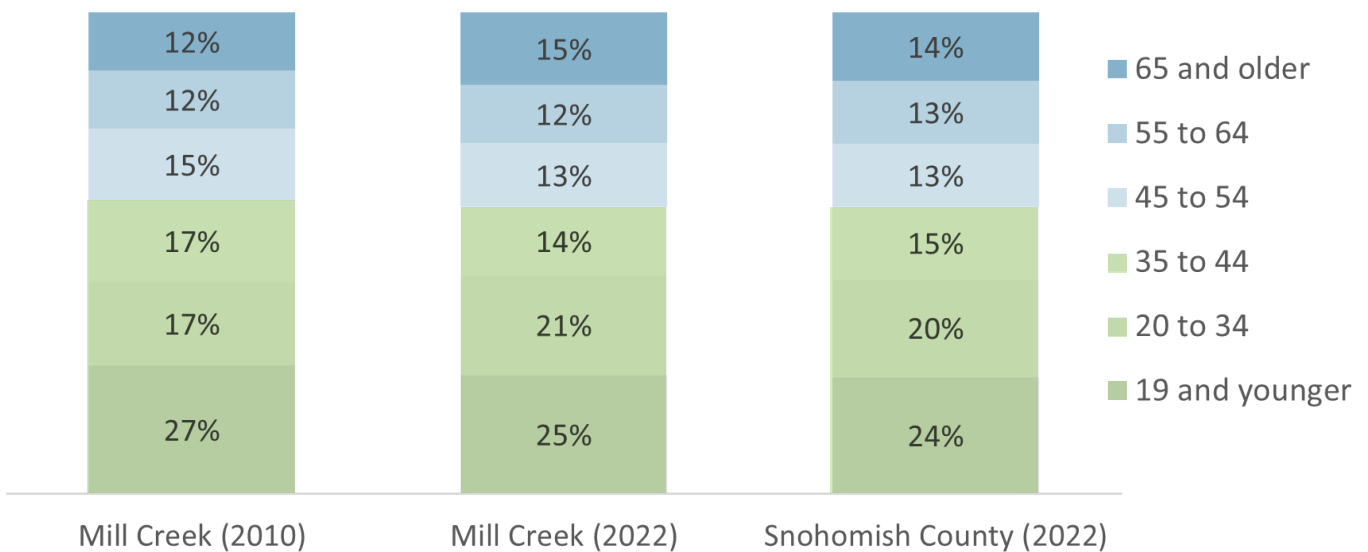
Source: Washington Office of Financial Management (OFM), Snohomish County HO-5 Report



The population of Mill Creek has **aged slightly since 2010**, with an increase in residents over 65, and is similar to Snohomish County overall, as shown below in Figure 2. Older residents can have **specific housing needs** ranging from **smaller and accessible units to access to transit or assisted living**. This will become particularly important if the population of the city continues to age following recent trends. While overall, the city of Mill Creek’s population has been aging, the majority of residents are 44 and younger, and the community is a desirable place for families with children.

FIGURE 02.

## Age Distribution in Mill Creek and Snohomish County, 2010-2022

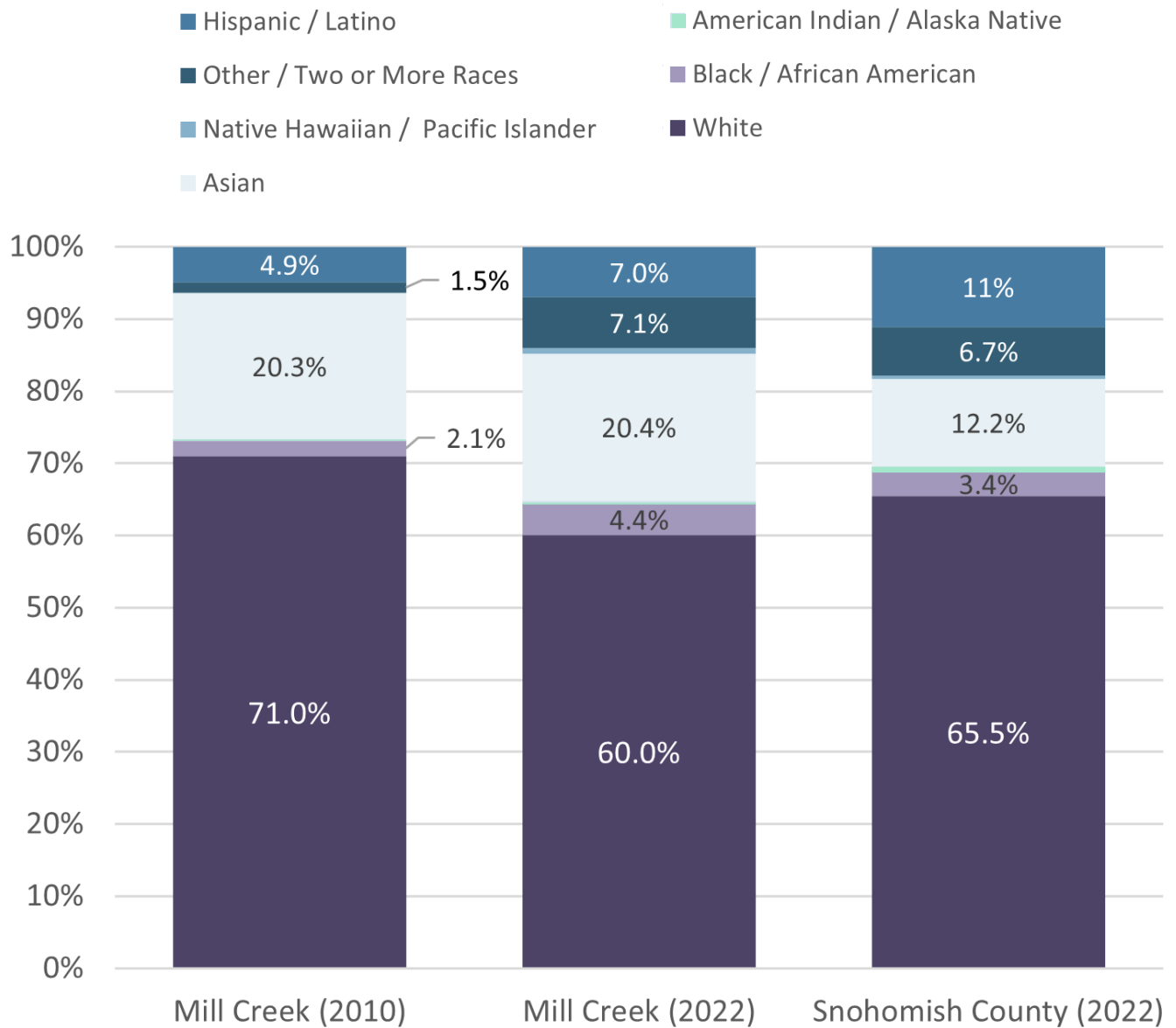


Source: 2022 American Community Survey 5-Year Estimates, Table DP05



FIGURE 03.

## Race/ Ethnicity in Mill Creek and Snohomish County



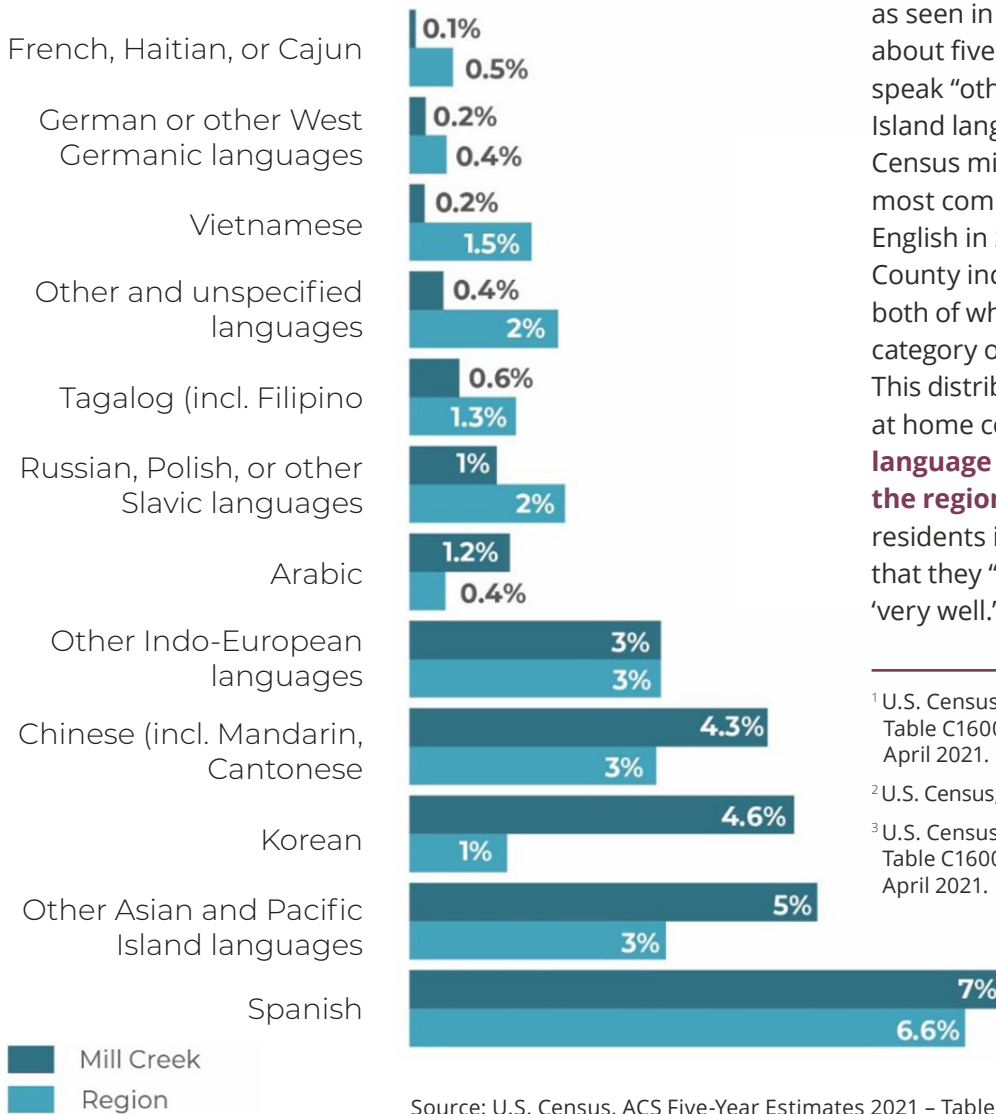
Source: 2022 American Community Survey 5-Year Estimates, Table DP05

Mill Creek's population has become notably more racially and ethnically diverse



FIGURE 04.

## Languages Other than English Spoken in Mill Creek and the Region



Source: U.S. Census, ACS Five-Year Estimates 2021 – Table C16001

About 72 percent of Mill Creek residents speak English at home, with the **most common other languages being Spanish (seven percent) and Korean (five percent)** as seen in Figure 4.<sup>1</sup> Furthermore, about five percent of residents speak “other Asian and Pacific Island languages.” According to Census microdata, some of the most common languages other than English in South Central Snohomish County include Hindi and Telugu, both of which would fall under the category of “other” Asian languages.<sup>2</sup> This distribution of languages spoken at home constitutes **more diverse language usage than that of the region**. About nine percent of residents in each geography indicate that they “speak English less than ‘very well.’”<sup>3</sup>

<sup>1</sup> U.S. Census, ACS Five-Year Estimates 2021 – Table C16001: Language Spoken at Home, April 2021.  
<sup>2</sup> U.S. Census, PUMS Microdata 2021, April 2021.  
<sup>3</sup> U.S. Census, ACS Five-Year Estimates 2021 – Table C16001: Language Spoken at Home, April 2021.

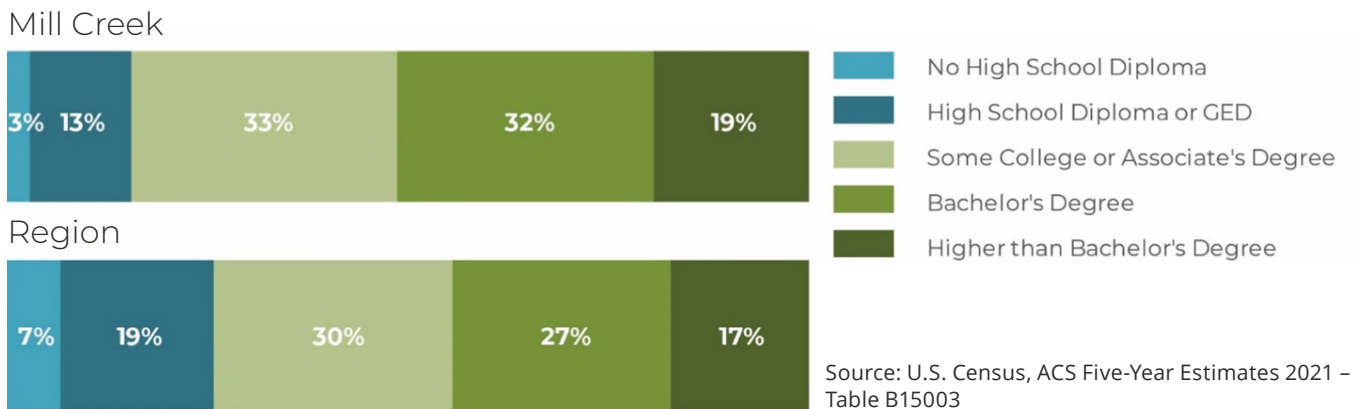
72% of Mill Creek residents speak English at home, with the most common other languages being Spanish and Korean



Mill Creek residents have received a relatively high degree of formal education. Only three percent of residents over the age of 24 did not obtain a high school diploma or GED, while this is true for nearly seven percent of the region (Figure 2.5).<sup>4</sup> Similarly, more than half (51 percent of city residents) have received a bachelor's degree or higher, compared to 44 percent in the region. This represents a two percentage point increase in the city and a seven percentage point increase in the region since 2012.

<sup>4</sup>U.S. Census, ACS Five-Year Estimates 2021 – Table B15003: Educational Attainment, April 2021.

FIGURE 05.  
**Education Attainment (Age 25+) Distribution for Mill Creek and the Region**





# LAND USE

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# Introduction

**The Land Use element is a central component of this Comprehensive Plan. The purpose of this element is to establish and distribute land use designations that meet the current and future needs for Mill Creek’s residential, employment, recreation, and public facilities land uses.**

This element also sets the groundwork plan for accommodating the city’s allocated growth targets, provided by Snohomish County. Other elements of this plan provide direction in successfully implementing the growth strategy set forth by this element.

Accommodating growth is a key aspect of the land use element, but equally important is enhancing the quality of life for Mill Creek’s residents. Achieving a balance between housing, employment, entertainment, civic facilities, and open spaces is crucial for the community’s well-being. By ensuring an equitable distribution of diverse land uses, Mill Creek aims to provide a well-rounded and enriching experience for residents and visitors.

The Land Use element aims to do the following:

- » Document existing conditions, land use patterns, and recent land use changes;
- » Provide written definitions and geographic designations for all land uses;
- » Explain how the City will accommodate the expected population and employment growth;
- » Provide a future land use map that the City will utilize for the next 20-year period;
- » Contain goals and policies to guide the future land use map; and
- » Incorporate public engagement and implementation strategies to accompany the goals and policies.

# LAND USE GOALS AND POLICIES

## GOAL LU-1

Maintain the character of Mill Creek including the diverse range of established residential neighborhoods throughout the city, vibrant central business/retail commercial districts, and an extensive network of neighborhood parks, trails, and open space corridors while ensuring well-planned and cohesive future growth.



### POLICY LU-1.1

Allow a range of residential densities in an effort to diversify the city's housing opportunities, while maintaining compatibility with surrounding land uses, increasing affordability for all members of the community.

### POLICY LU-1.2

*Encourage new residential developments to be aesthetically pleasing and designed to enhance neighborhood livability. Maintain vegetated areas to provide neighborhood identity; wildlife habitat corridors; pedestrian linkage to other residential developments and activity areas. Require future developments to protect environmentally sensitive areas.*

### **POLICY LU-1.3**

Support the redevelopment of underutilized lands to mixed use and higher density housing to meet housing and jobs targets allocated to Mill Creek to complement the development of centers and the enhancement of existing neighborhoods.

### **POLICY LU-1.4**

Increase housing density and jobs near high-capacity transit corridors to reduce vehicle miles traveled by facilitating access to transit, reduce traffic, and improve transit access, while supporting allocated targets for Mill Creek.

### **POLICY LU-1.5**

Work to reduce and mitigate the risk to lives and property caused by wildfires by adopting appropriate building and maintenance standards, utilizing land use planning tools, and through community wildfire preparedness and fire adaptation measures.



## GOAL LU-2

Encourage medium and high density residential and mixed-use neighborhoods in appropriate locations, within close proximity to commercial areas that offer public facilities, transit, and other urban services.



### POLICY LU-2.1

Encourage well-designed mixed-use neighborhoods with a strong sense of place, access to transit, and inviting for pedestrian and bicycle activity.

### POLICY LU-2.2

Facilitate multi-purpose trips by incorporating pedestrian, bicycle, and transit-oriented design along public transportation corridors.

### POLICY LU-2.3

Ensure new residential developments are compatible with surrounding land use patterns in height, scale, design, and quality, to provide a reasonable transition of residential densities.

### POLICY LU-2.4

Encourage the use of mixed-use development as a transition between office and commercial uses and surrounding residential neighborhoods. Multi-family residential uses on the primary access road are encouraged to provide office and/or retail uses on the ground floor with residential units above.



## GOAL LU-3

Maintain and expand the vibrancy of existing business, commercial, and mixed-use areas through high-quality development standards.



### POLICY LU-3.1

Ensure new residential developments are compatible with surrounding land use patterns in height, scale, design, and quality, to provide a reasonable transition of residential densities.

### POLICY LU-3.2

Enhance urban design of Mill Creek's key gateway locations through the utilization of the City's adopted Subarea Plans and Design Guidelines, and the City's Street, Stormwater, and Development Standards, and coordinate with adjacent jurisdictions, as necessary.

### POLICY LU-3.3

Ensure new commercial and mixed-use developments are high quality, compatible with surrounding land uses, and consistent with Mill Creek Design Review Standards. Ensure land-efficient parking facilities.

### POLICY LU-3.4

Encourage the development of compact retail commercial nodes in the city and discourage the development of new strip mall retail centers.

### POLICY LU-3.5

Design public buildings and spaces that contribute to the city's livability, desirable sense of place, and community identity.

### **POLICY LU-3.6**

Ensure new business and commercial developments preserve and integrate natural vegetation and features, including creeks, ravines, and wetlands, into the design of the development. Design of such developments must take into account vehicular circulation and traffic impacts.

### **POLICY LU-3.7**

Require new light industrial developments to be designed similarly to the surrounding business and commercial uses and/or according to new design standards.

### **POLICY LU-3.8**

Encourage the use of buffers and natural areas to achieve tree preservation, wildlife habitat, and to provide visual separation between contiguous developments and different land uses. Design arterial and collector streets in residential areas to include roadway buffers.



## GOAL LU-4

Ensure coordination between development regulations and local organizations' efforts to address and improve upon healthy lifestyle options within the city such as promoting pedestrian and bicycle improvements.



### POLICY LU-4.1

Support agricultural and aquatic uses, which enhance the natural food chain throughout the Puget Sound region and its capacity to produce fresh and minimally processed foods, by encouraging community gardens, farmers markets, and other small-scale initiatives.

### POLICY LU-4.2

Promote cohesive development of the community through safe and attractive pedestrian and bicycle pathways that connect residential, natural, and commercial areas of the city.

### POLICY LU-4.3

Identify and address existing health disparities and improve health outcomes in all residents within the city.

## GOAL LU-5

Work cooperatively with Snohomish County to ensure annexation areas are developed consistent with City development standards, have an orderly transition to City governance, and are adequately serviced by existing facilities (or services can be provided for in an efficient manner).



### POLICY LU-5.1

Consider establishing future land use designations on properties within the City's Municipal Urban Growth Area, particularly undesignated properties.

### POLICY LU-5.2

Review and provide comments on proposed developments, regulations, and plans, within the Municipal Urban Growth Area to ensure compatibility with the City's regulations.

### POLICY LU-5.3

Where the City's Municipal Urban Growth Area overlaps with the City of Lynnwood's Municipal Urban Growth Area, coordinate with Lynnwood and Snohomish County as these areas develop as part of future annexation considerations.

### POLICY LU-5.4

Future annexations of surrounding areas shall be logical expansions of, and be contiguous with, the City's boundaries.

### POLICY LU-5.5

Evaluate potential annexations based on the City's ability to provide sufficient services to the area and its fiscal and operational impacts to the City.

## **POLICY LU-5.6**

Evaluate potential annexations based on anticipated financial burden to the City resulting from annexation.

## **POLICY LU-5.7**

City provided infrastructure, utilities, and other services shall be planned for and made available concurrently with, or within a reasonable time after, annexing land to the City.



## GOAL LU-6

Coordinate and engage with public agencies, tribes, and other organizations on matters of future growth and development.



### POLICY LU-6.1

Ensure Mill Creek's growth is consistent with the Growth Management Act, VISION 2050, and Snohomish County's regulations, while maintaining the City's established identity.

### POLICY LU-6.2

Cooperate with agencies that have jurisdiction over aspects of development in Mill Creek and ensure decisions and actions taken promote the City's goals.

### POLICY LU-6.3

Educate and encourage the participation of all residents, community associations, tribes, and other interest groups in the planning and decision-making process, including, but not limited to, the preservation of environmental and culturally significant sites.

### POLICY LU-6.4

Recognize and work to enhance contiguous systems that cross jurisdictional boundaries in community planning, development, and design; including natural systems, land use patterns, and transportation and infrastructure systems.

### POLICY LU-6.5

Ensure zoning designations can accommodate the projected population, housing, and employment targets of the City.

### POLICY LU-6.6

Preserve significant citywide and regional historic, visual, and cultural resources, including public views, landmarks, archaeological sites, historic, and cultural landscapes.

## GOAL LU-7

Ensure equitable access to City resources, programs, and development processes, through proactive and transparent outreach.



### POLICY LU-7.1

When considering development proposals within the city, ensure that proposed regulatory or administrative actions protect private property rights.

### POLICY LU-7.2

Ensure development permits are evaluated and processed in a timely manner without reducing the City's adopted environmental, level of service, and land use standards.

### POLICY LU-7.3

Reduce disparities in access to opportunity for Mill Creek's residents through inclusive community planning and targeted public and private investments that meet the needs of current and future residents and businesses.

### POLICY LU-7.4

Evaluate and use a range of strategies to mitigate potential physical, economic, and cultural displacement of marginalized residents and businesses in areas of planned redevelopment.

### POLICY LU-7.5

Incorporate environmental justice considerations in all planning efforts within the city, including efforts to avoid creating or worsening environmental health disparities.

# LAND USE SUPPORTING ANALYSIS

## Background Analysis Existing Conditions

The following summary of existing conditions provides information on Mill Creek’s growth targets, land use patterns, subareas, and unincorporated areas within the Municipal Urban Growth Boundary (MUGA).

### Growth Targets

In its 2021 Buildable Lands Report, Snohomish County collected information from the development that had occurred throughout the county between 2012 and 2019. With this information, the Buildable Lands Report calculated the projected growth of the county, and found it is expected to add an additional 308,352 population by the year 2044. This growth will be spread throughout the county, in incorporated cities, cities’ MUGAs, and unincorporated county lands.

Through its Countywide Planning Policies (CPPs), Snohomish County allocates a percentage of this

countywide growth to the various cities, MUGAs, and unincorporated areas. The City of Mill Creek was allocated a **2044 growth target of 24,813 total population**, resulting in an increase of **3,887** people from the 2020 population. This is approximately 1.3 percent of the total countywide growth projection<sup>1</sup>. Snohomish County CPPs also allocate specific growth targets for both housing units and employment – see the **Housing and Economic Vitality Elements** for more information on these targets.

<sup>1</sup> United States Census Bureau, 2020 Decennial Census, Retrieved December 2022

TABLE 01.

### Mill Creek’s Allocated 2044 Population, Housing Unit, and Employment Growth

SUBJECT	2020 TOTAL	2044 TARGET	GROWTH INCREASE
<b>Population</b>	20,926	24,813	3,887
<b>Housing</b>	8,961	11,578	2,617
<b>Employment (2019)</b>	6,787	7,523	736



The growth targets allocated by Snohomish County are intended to be a jurisdiction's fair share of the population, housing, and employment growth that is expected over the next 20 years. **Tables 2 through 4 below compare Mill Creek's allocated targets to those of neighboring jurisdictions.** As shown on these tables, Mill Creek is allocated the smallest percentage of the county's growth compared to nearby cities. Population, housing units, and jobs targets for Mill Creek increase by the lowest percentage.

TABLE 02.

### Comparative Population Growth Targets

SUBJECT	2020 TOTAL	2044 TARGET	GROWTH INCREASE	PERCENT INCREASE	PERCENTAGE OF TOTAL COUNTY GROWTH
<b>Snohomish County</b>	827,957	1,136,309	308,352	37.2%	100%
<b>Everett</b>	110,629	179,176	68,547	62%	22.2%
<b>Mountlake Terrace</b>	21,286	34,710	13,424	63.1%	4.4%
<b>Mill Creek</b>	<b>20,926</b>	<b>24,813</b>	<b>3,887</b>	<b>18.6%</b>	<b>1.3%</b>

TABLE 03.

### Comparative Housing Growth Targets

SUBJECT	2020 TOTAL	2044 TARGET	GROWTH INCREASE	PERCENT INCREASE	PERCENTAGE OF TOTAL COUNTY GROWTH
<b>Snohomish County</b>	317,348	484,791	167,443	52.8%	100%
<b>Everett</b>	47,023	85,580	38,557	82%	23%
<b>Mountlake Terrace</b>	9,133	16,816	7,683	85.7%	4.6%
<b>Mill Creek</b>	<b>8,961</b>	<b>11,578</b>	<b>2,617</b>	<b>29.2%</b>	<b>1.6%</b>

TABLE 04.

## Comparative Job Growth Targets

SUBJECT	2020 TOTAL	2044 TARGET	GROWTH INCREASE	PERCENT INCREASE	PERCENTAGE OF TOTAL COUNTY GROWTH
<b>Snohomish County</b>	295,816	484,791	171,818	58.1%	100%
<b>Everett</b>	99,817	167,157	67,340	67.5%	40.3%
<b>Mountlake Terrace</b>	8,431	11,148	2,717	32.2%	1.6%
<b>Mill Creek</b>	<b>6,787</b>	<b>7,523</b>	<b>736</b>	<b>10.8%</b>	<b>0.4%</b>

As part of this Comprehensive Plan update, jurisdictions must demonstrate and plan for how they will accommodate the allocated growth targets from the County. The first step in demonstrating this is determining each jurisdiction's current capacity for housing and employment.

Snohomish County's 2021 Buildable Lands Report provides total land capacity estimates for each jurisdiction through the year 2044. See Table 5 below.

Through the year 2044, Mill Creek is anticipated to have enough land capacity to accommodate some, but not all of the City's allocated 2044 growth targets. This means that by the year 2044, the City will have a shortfall of capacity if no changes are made.

As Mill Creek does not currently have the capacity to accommodate its 2044 growth targets, the City will be amending zoning in the South Town Center (formerly Mill Creek Boulevard) Subarea to provide additional capacity.

Land use designations and zoning play a significant role in ensuring the City has sufficient land capacity to accommodate its allocated growth, both in the distribution of those uses, as well as the densities and types of development allowed within them. One of the easiest ways to ensure sufficient capacity for Mill Creek's allocated growth is to make changes to the City's land use designations, zoning, and development regulations to allow for more types and densities of development.

TABLE 05.

## Comparative Job Growth Targets

AREA	2020 TOTAL	2044 TARGET	GROWTH INCREASE	PERCENT INCREASE
<b>Housing</b>	9,069	11,686	9,671	1,907
<b>Employment (2019)</b>	6,787	7,523	7,116	407

Source: 2022 American Community Survey 5-Year Estimates, Table DP04

## Land Use Patterns

More intense land uses are primarily located along the major transit corridors and within the different subareas of the city. These areas tend to have a more diverse land use distribution, including residential, mixed use, commercial, etc. Portions of the city located outside of these corridors and subareas are predominantly residential uses.

In total, residential uses (LDR, MDR, HDR, Mixed-Use/High-Density Residential) make up approximately 67 percent of the total land use within the city. A large portion of the nonresidential uses (Business and Industrial Park, Community Business, Neighborhood Business, and Urban Center) within the city are those relating to commercial, predominantly along the west side of the Bothell-Everett Highway (SR 527) corridor and the south side of the 132nd St SE corridor. These uses make up approximately 9.6 percent of the land uses within the city. City-operated services such as parks, recreation, open space, and public facilities make up approximately 9.4 percent of the total land uses within the city. As part of the ongoing efforts to update the Mill Creek Comprehensive Plan, the City is updating the land use map designations, as well as zoning and development codes. See Mill Creek's Land Use Map, page LU-23.

## Developable Lands

Snohomish County publishes a Buildable Lands Report every five years with the most recent document being published in June of 2021. This document analyzes and collects data on the uses of all parcels within Snohomish County broken down by jurisdiction. Parcels are broken down into a variety of land statuses:

- » Religious Use
- » Constant
- » Partially-Used
- » Pending
- » Redevelopable
- » School
- » Special
- » Vacant

The vast majority of parcels within Mill Creek are classified as having a constant use and are unlikely to be redeveloped within the next twenty years. The parcels identified as partially-used and/or redevelopable are scattered throughout the city. The majority of this land is classified as the Low-Density Residential land use designation. See the Land Capacity Analysis Methodology and Results document in the Appendix for more information.





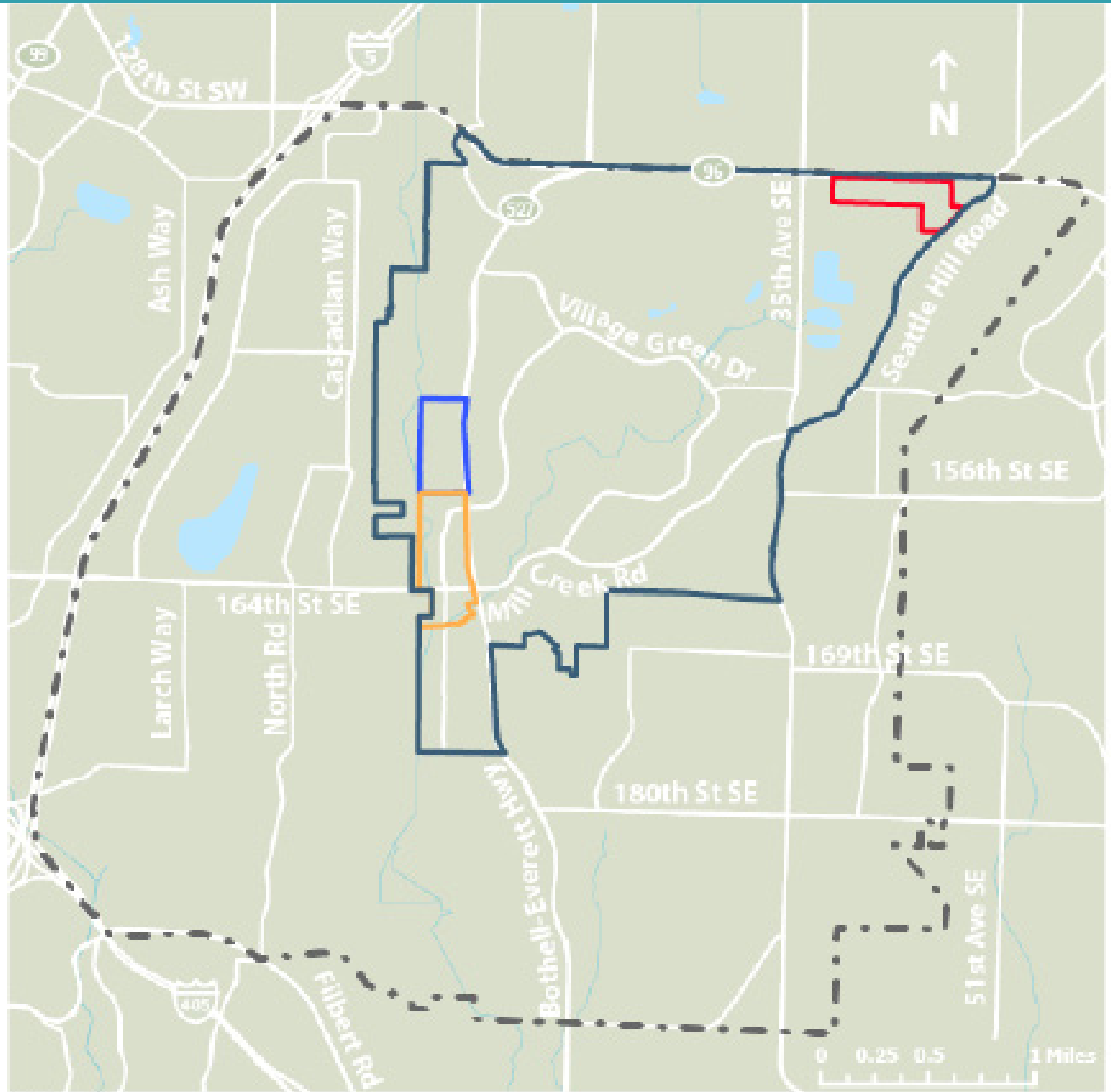
## Municipal Urban Growth Area (MUGA) Boundary and Annexation Areas

Official recognition of each City's MUGA boundaries is intended to be accomplished through the inclusion of the boundaries within the adopted Snohomish County General Policy Plan and the Countywide Planning Policies. Snohomish County's most recent MUGA map was published in March of 2022. The City will work closely with Snohomish County to address planning issues in the MUGA.

In the adopted Countywide Planning Policies, the Mill Creek and the City of Lynnwood MUGAs overlap. The City of Mill Creek's west MUGA boundary is Interstate 5, while the east boundary of Lynnwood's MUGA boundary is Larch Way. When an overlap exists with an adjacent jurisdiction and an agreement cannot be reached regarding a mutually agreeable boundary, either jurisdiction can annex property within the overlapping area. The annexation process established in state law will, therefore, resolve the overlap issue over time.

The Growth Management Act (GMA) and the Countywide Planning Policies encourage a fiscal impact analysis of the long-term financial impacts of comprehensive plans, implementation measures, annexations, capital facility investments and private development projects. The City must carefully evaluate the long-term fiscal impacts of implementing the Comprehensive Plan, private development projects, capital facility improvements and annexations.

FIGURE 01. City Limits, MUGA, & Subareas



Subareas

-  Town Center
-  South Town Center
-  East Gateway Urban Village
-  Mill Creek City Limits
-  Mill Creek Urban Growth Area (MUGA)





## LAND USE DESIGNATIONS

Land use designations are a way of managing the growth and development of specific areas within the city. They provide guidance on the general types of uses that are allowed within each area, as well as what types of uses are prohibited. Land use designations inform what zoning can occur in these areas as well – for example an area with a residential land use designation cannot be zoned for industrial use.

As noted in the Growth Targets section, the City of Mill Creek is anticipated to have a shortfall of land capacity, meaning the City will not be able to accommodate its growth allocations unless changes to the City's approach to growth are made. For this Comprehensive Plan update, the City is proposing changes in land use designations in the South Town Center Subarea and related development regulation updates. The combination of these changes will ensure that the city has enough land capacity to accommodate Mill Creek's allocated growth targets.

Below are the descriptions of each land use designation shown in the Land Use Map.

### **LOW-DENSITY RESIDENTIAL (UP TO 6 D.U./ACRE)**

Low-density residential is the most common style of development within Mill Creek. The existing pattern of low-density development in the city has predominantly occurred east of Bothell-Everett Highway. While low density-residential will continue to be the largest land use designation by area, there is now a low supply of developable land zoned for low density residential uses.

New development should be designed to optimize compatibility with existing low-density residential neighborhoods, transportation facilities and environmental and topographic characteristics. Future residential development is expected to occur primarily in areas of the city designated as urban centers.

New development should be designed to optimize compatibility with existing low-density residential neighborhoods, transportation facilities and environmental and topographic characteristics.

## **MEDIUM-DENSITY RESIDENTIAL (MAXIMUM 12 D.U./ACRE)**

Medium-density residential provides alternative housing types and site designs to typical single-family detached neighborhood development patterns and to provides for clustered attached housing situated within close proximity to commercial activity areas and transit facilities.

This type of housing is consistent with the goal of remaining a predominately single-family community.

Areas appropriate for medium-density residential uses include areas that are situated adjacent to or within close proximity to transportation corridors, transit facilities, recreation facilities and major commercial and employment areas or compatible low-density residential areas.

## **HIGH-DENSITY RESIDENTIAL (MAXIMUM 24 D.U./ACRE)**

High-density residential developments are a necessary component in the city's housing mix and its contribution toward affordable housing and effective transit planning. The majority of the city's high-density residential housing is located along the Bothell-Everett Highway. Consistent with the existing development patterns, future high-density residential dwelling units should generally be planned in close proximity to commercial, employment and transit facilities.

High-density residential should contain the same locational characteristics as medium-density residential. High-density residential should be planned along the Bothell-Everett Highway corridor, especially near Town Center, or adjacent to commercial centers and transit facilities.

## **MIXED-USE/HIGH-DENSITY RESIDENTIAL (MAXIMUM 30 D.U./ACRE)**

High-density housing within close walking distance to Town Center, is desirable as a means of extending the neighborhood social realm to the shopping and employment area of the subareas and generally reducing the number of vehicular trips. In addition, it is appropriate to encourage a mix of commercial and office uses to be integrated with the residential uses north of Town Center as a means of extending the employment and retail services to the neighborhood level.

High-density residential with neighborhood commercial and office uses is appropriate north of the Town Center on the west side of the Bothell-Everett Highway corridor and on the east side of Bothell-Everett Highway south of Seattle Hill Road, due to the proximity to the existing commercial and office uses, transit and pedestrian connections.

Situating high-density residential uses with neighborhood commercial and office uses within walking distance of existing and planned office, commercial and employment areas and transit facilities is desirable to minimize vehicular trips. Well-designed, distinctive mixed-use developments also function as visual gateways to the city.



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## NEIGHBORHOOD BUSINESS

The purpose of the neighborhood business land use designation is to accommodate centrally located and concentrated areas that provide a limited range of retail sales and services to nearby neighborhoods. Uses allowed in neighborhood business zones typically include retail sales and services (except automobile sales), professional and personal services, and restaurants. High- and medium-density residential uses are generally compatible within neighborhood business zones, but should only occur if designed to complement commercial land uses.

## COMMUNITY BUSINESS

The purpose of the community business land use designation is to promote economic stability for the City through jobs and tax base by providing an appropriate amount of commercial land. Areas designated community business should be properly sited to take advantage of a safe and efficient transportation network and transit facilities, provides a broad range of goods and services and be compatible with surrounding land use designations and environmentally sensitive areas. The land use designation also allows for a limited amount multifamily residential development. High-density residential should contain the same locational characteristics as medium-density residential, with the exception of location. High-density residential should be planned along the SR 527 corridor, including the Town Center area, or adjacent to commercial centers and transit facilities.

## URBAN CENTER

The rationale underlying the Urban Center land use designation is to provide areas for an integrated form of development that supports vibrant, pedestrian-oriented destinations to flourish. The Mill Creek Town Center, South Town Center, and East Gateway Subareas are designated as urban centers. The Urban Center designation provides adequate area for a mix of medium and high density residential, commercial, institutional, and public uses to form an urban community and provide economic stability for the City by providing jobs and a diversified tax base. The designation is placed on properties that take advantage of access from arterial highways and transit facilities as well as being accessible to residents within the surrounding neighborhoods.

In addition to commercial land uses, medium- and high-density residential, institutional, and public land uses are desirable within the Urban Center areas to contribute to the pedestrian activity levels by extending the neighborhood realm into and amongst the commercial areas. In addition, vehicular trips can be reduced by providing various land uses within walking distance from each other.

Urban Center designations are appropriate where a concentrated pattern of higher intensity activity exists or is planned adjacent to and served by major transportation corridors. Unlike other designations, the Urban Center land use designation does not have a maximum density as the scale of development is established through application of design standards and maximum building heights.



## BUSINESS PARK

Manufacturing, assembly, distribution, health services and facilities and wholesale/office activities play a role in the City's economy by providing jobs and adding to the tax base. To support these types of land uses in the local economy it is necessary to provide for the appropriate amount of land.

The major form of business park land uses should occur in campus style development and on large tracts of land that are planned, developed and operated as integrated facilities. Special attention should be given to circulation, transit access, parking, utility needs, aesthetics and compatibility between uses both within the business park and with surrounding uses.

The underlying rationale for the business park designation is to provide an appropriate supply of land for a variety of light industrial and office uses that may depend upon close proximity to other industries and are dependent on an urban labor supply. Through the conditional use process, hospitals, health care facilities, retirement and nursing homes, as well as congregate care facilities may be permitted in the business park land use designations as well. In addition, the designation should promote efficient public and private utility and transportation expenditures, and promote compatibility with surrounding non-industrial land uses and environmentally sensitive areas.



## PUBLIC AND QUASI-PUBLIC

Public and quasi-public land uses are important components of the city, and add immeasurably to the quality of urban life. Public and quasi-public land uses denote that they are owned by the public and operated for the benefit of the community at large. The demand for more and varied public lands and services increases as the city expands, population grows, older facilities become outmoded, and living standards and public expectations rise.

The intent of the public and quasi-public land use designations in the Comprehensive Plan is to supply an appropriate amount of community facility uses and needs to serve the ever increasing demands of the residents. As described below, public and quasi-public land uses include civic uses, transit facilities, neighborhood and community parks, and public open space.

- » **Civic Facilities:** Civic facilities include things such as a community center, post office, public performance space, library, and city hall. These facilities should be located along major commercial and transportation corridors, be easily accessible by transit, pedestrian trails, and collector and arterial streets, and be compatible with surrounding land uses.
- » **Public Open Space:** Greenway uses should be planned in areas where natural amenities such as streams, wetlands, natural vegetation areas and large open spaces can be utilized for pedestrian and cycling linkages and as separators between urban land uses. Such open space/greenways can also be used to buffer potentially incompatible land uses and provide visual quality and identity to neighborhoods throughout the city.

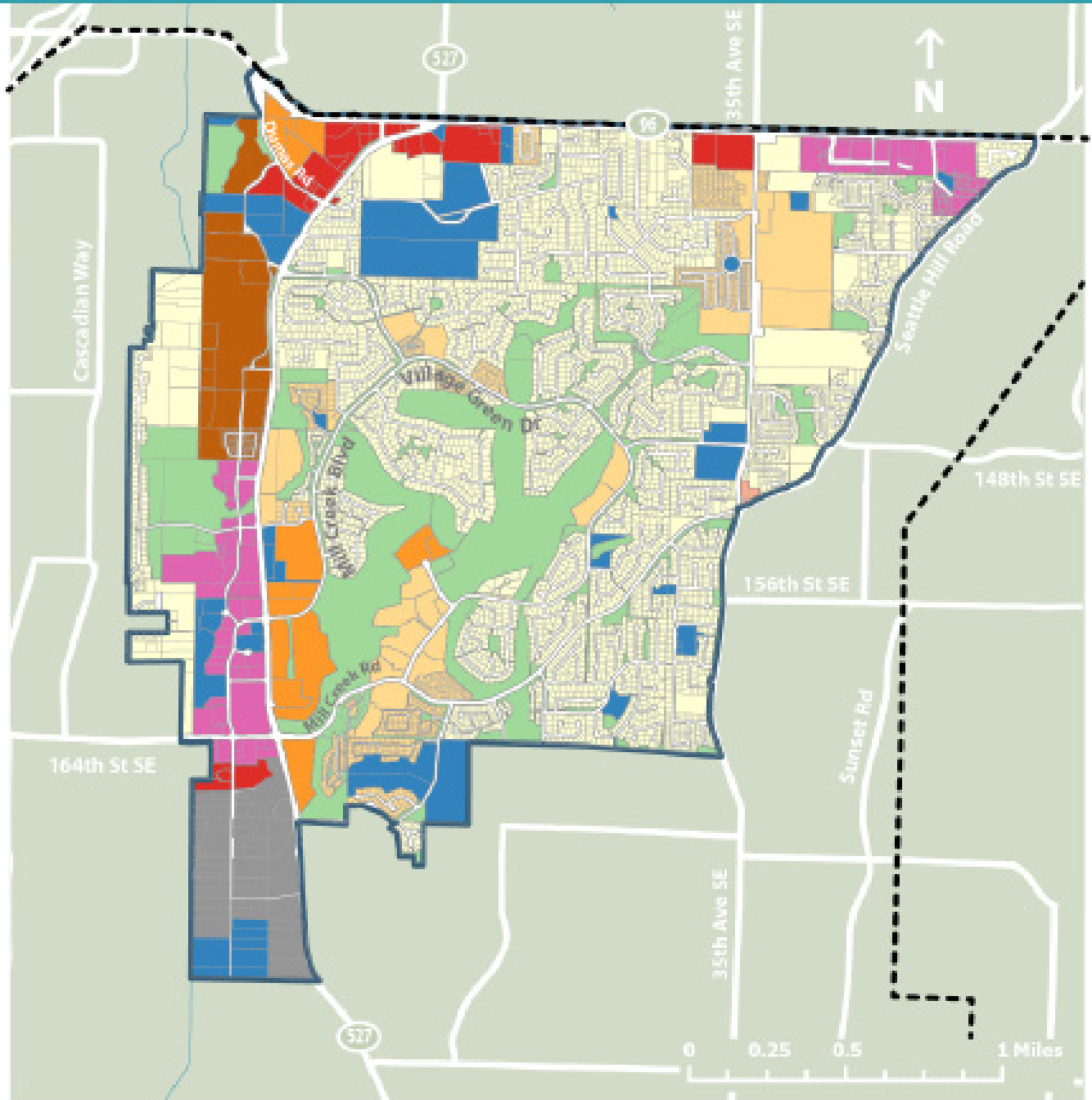
- » **Private Open Space:** Private open spaces include the existing golf course, nature preserve, tot lots, and other open space corridors that are owned and maintained by private property associations. Private tot lots should be located within easy access to surrounding neighborhood residences, while private open spaces should be planned in areas to separate land use incompatibilities and complement the pedestrian trail system.
- » **Transit Facilities:** Transit facilities should be located along the Bothell-Everett Highway corridor and on collector and arterial streets conveniently sited near population and employment areas. They should be incorporated into the overall design of the adjacent land use, and be designed to include shelter/weather protection facilities.

## ESSENTIAL PUBLIC FACILITIES LAND USE ISSUES

The Growth Management Act requires local jurisdictions to include within their comprehensive plans a process for identifying and siting essential public facilities, and requires the state and county to maintain a list of proposed essential public facilities. Essential public facilities serve regional as well as local needs and because of their perceived impacts, are often difficult to site. The Comprehensive Plan and development regulations are prohibited from precluding the siting of essential public facilities.

However, while the City cannot prohibit essential public facilities, the City does have the ability to review and place conditions on such facilities through its development regulations.

FIGURE 02. Mill Creek Land Use



- |                                    |   |
|------------------------------------|---|
| Low-Density Residential            | Business and Industrial Park                  |
| Medium-Density Residential         | Urban Center                                  |
| High-Density Residential           | Public and Quasi-Public                       |
| Mixed Use/High-Density Residential | Open Space - Private                          |
| Neighborhood Business              | Mill Creek City Limits                        |
| Community Business                 | Mill Creek Municipal Urban Growth Area (MUGA) |



# Subareas

Mill Creek has three subareas within the city: Town Center, South Town Center (formerly known as the Mill Creek Boulevard Subarea), and East Gateway Urban Village. These subareas are designated as urban centers to encourage a mixed-use pattern of development. The majority of land located outside of these subareas consists of residential land use designations of varying densities. Summaries for each subarea, as well as a summary for the areas outside of the subareas are provided in the following text.

## Town Center

Town Center is located between Bothell-Everett Highway and the North Creek Greenway and extends to the north and south of 153rd Street SE. See Figure 3.

Mill Creek Town Center was created to give the community a commercial and social core with a very walkable main street as the central spine. After the City adopted its 1992 comprehensive plan, community members came together to develop plans for a town center, and construction began nearly ten years later. Town Center opened in 2002. Considered to be a lifestyle destination for Mill Creek residents and people throughout the region, Town Center today has over 80 shops, restaurants, and other services.<sup>2</sup>

Town Center set great precedent for how other subareas in the city are executed. A unique feature of the Town Center was the implementation of Design Guidelines to control aesthetic components. These components include site design and site features, landscaping, building architecture, public plazas, streets, sidewalks, parking areas, and signage. Because of this thoughtful and intentional design, Town Center is one of the most notable places for people who live within and around Mill Creek.

## SUPPORTING PROVISIONS

The following ordinances and chapter from the Mill Creek Municipal Code support the development and implementation efforts of the Mill Creek Town Center Subarea:

- » Chapter 17.21 MCMC 'TC – Town Center'
- » Ordinance No 2005-608: Design Guideline Amendments for the Mill Creek Town Center

## KEY PRIORITIES

- » The following are identified as key priorities for future development within the Mill Creek Town Center subarea:
- » Maintain a diverse mix of uses (commercial, office, residential, public services) in the Town Center.
- » Encourage a Town Center that is strongly pedestrian oriented and transit friendly.
- » Continue to enhance and preserve a strong identity for the Mill Creek Town Center.
- » Maintain places that provide for the needs of the diverse population of the community.
- » Enhance connectivity and integration of the Town Center uses, the adjacent North Creek Corridor, and the surrounding setting.
- » Create cohesion and enhance connecting with the South Town Center Subarea adjacent to the south of Town Center.

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<sup>2</sup> Mill Creek Boulevard Subarea Plan, 2022

FIGURE 03. **Town Center Location**



-  Town Center Subareas
-  Mill Creek Parcels
-  Mill Creek City Limits



## East Gateway Urban Village

The East Gateway Urban Village (EGUV) subarea is comprised of approximately 52 acres south of 132nd Street SE between 35th Avenue SE and Seattle Hill Road. See Figure 4.

### PURPOSE OF SUBAREA

In 2007, Tiscareno Associates designed a master plan for a new sustainable neighborhood for the City of Mill Creek. Tiscareno Associates worked with City Planning staff and residents from surrounding neighborhoods to create a master plan that incorporates the community's preferences and concerns and preserves the landowners' needs and goals. The East Gateway Urban Village (EGUV) master plan, adopted by the City of Mill Creek, includes 889,700 square feet of residential, office, and retail spaces, and amenities including a church, grocery store, walking trails, and passive park spaces.<sup>3</sup>

The EGUV subarea plan was designed with internal access provided via a "Spine Road." Several parcels in the East Gateway Urban Village have developed or are proposed for development and construction of the "Spine Road" has been a condition of approval for these developments. Right-of-way was dedicated as part of the approval of the Polygon Apartments/Townhome development, the Gateway Building, the Vintage and The Farm. The City recognizes the need to provide circulation and access between the 39th Avenue SE and 44th Avenue SE signalized intersections consistent with the adopted plans for the EGUV.<sup>4</sup>

### SUPPORTING PROVISIONS

The following ordinance and chapter from the Mill Creek Municipal Code support the development and implementation efforts of the EGUV Subarea:

- » Chapter 17.19 MCMC 'EGUV – East Gateway Urban Village'
- » Ordinance No. 2008-684 East Gateway Urban Village Design Guidelines

### KEY PRIORITIES:

The following are identified as key priorities for future development within the EGUV subarea:

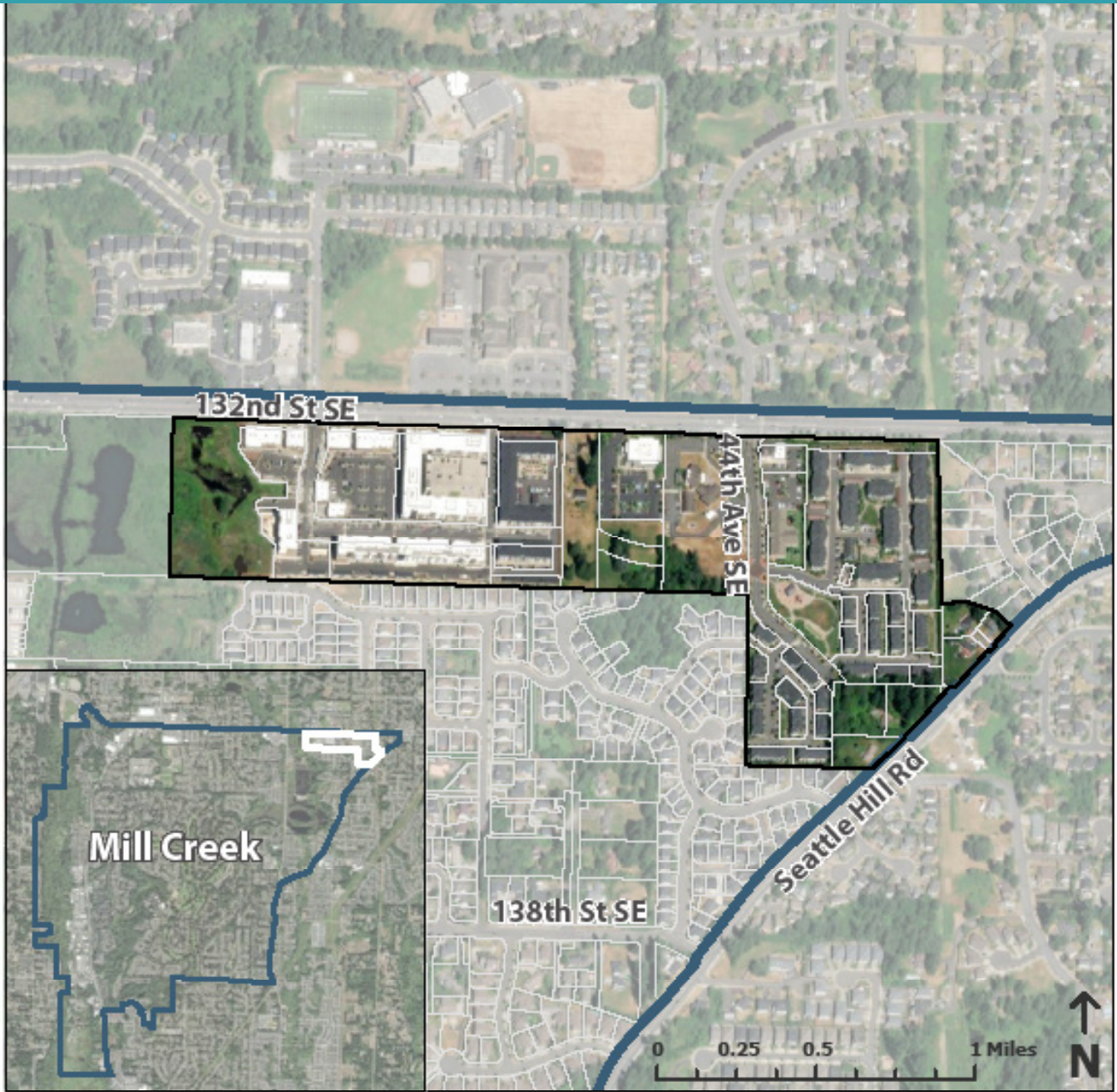
- » Continue to support a well-designed Urban Village that is pedestrian friendly and transit oriented.
- » Continue to preserve and enhance a strong identity for the Urban Village that includes a diverse mix of marketable commercial, public, and institutional uses and residential densities.
- » Continue to foster an Urban Village that is compatible with existing commercial development within the community through the use of high quality building materials and architecture, appropriate building scale, pedestrian facilities and public open spaces/plazas.
- » Incorporate buildings and spaces that facilitate activities that meet the needs of a diverse population of different ages.
- » Continue to implement the Urban Village in a manner that complements existing land uses and residential neighborhoods within the planning area and minimize negative environmental impacts.
- » Continue to incorporate medium and high-density residential neighborhoods to create a "critical mass" to support commercial services within the Urban Village.

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<sup>3</sup> EGUV Preliminary Engineering Study

<sup>4</sup> City of Mill Creek

FIGURE 04. East Gateway Urban Village Location



- East Gateway Urban Village Subareas
- Mill Creek Parcels
- Mill Creek City Limits



## South Town Center

The South Town Center Subarea, formerly referred to as the Mill Creek Boulevard Subarea, is located at the southwest corner of the city of Mill Creek and immediately to the south of Town Center Subarea. See Figure 5. The subarea is connected to adjacent jurisdictions and the Interstate 5 (I-5) corridor by 164th Street SE and the Bothell-Everett Highway and high-capacity transit via the Community Transit Swift Green Line and the Swift Orange Line.

The subarea's proximity to Town Center is an asset and an important opportunity. The City of Mill Creek is looking to extend the function of Town Center south into the South Town Center Subarea. This subarea will accommodate the growth allocations for population, housing, employment by focusing development near services and transit, in alignment with the Washington State Growth Management Act and regional policies.

### SUPPORTING PROVISIONS

Previous planning work for the South Town Center Subarea (formerly known as Mill Creek Boulevard) laid the groundwork for updating this area as part of the 2024 Comprehensive Plan update. Published in 2022, the plan outlines the following topics:

- » Relevant planning process
- » Existing conditions
- » Market assessment
- » Visions and goals
- » Alternatives analysis
- » Visualizations
- » Project Advisory Committee recommendations
- » Next steps and action plan

## COMPREHENSIVE PLAN LAND USE AND ZONING DESIGNATIONS

The South Town Center Subarea land use designation is being changed from Business Park and Community Business to Urban Center in order to match that of Town Center. Similarly, subarea will be rezoned from BP-Business Park and CB-Community Business to TC- Town Center. The intent of this change is to extend the design standards, density, and development potential from Town Center to South Town Center.

As such, Chapter 17.21 MCMC 'TC- Town' will apply to the South Town Center Subarea with the adoption of the 2024 Comprehensive Plan.

The South Town Center Subarea regulations and plan may be developed further with potential additional subarea planning in the future.

### KEY PRIORITIES

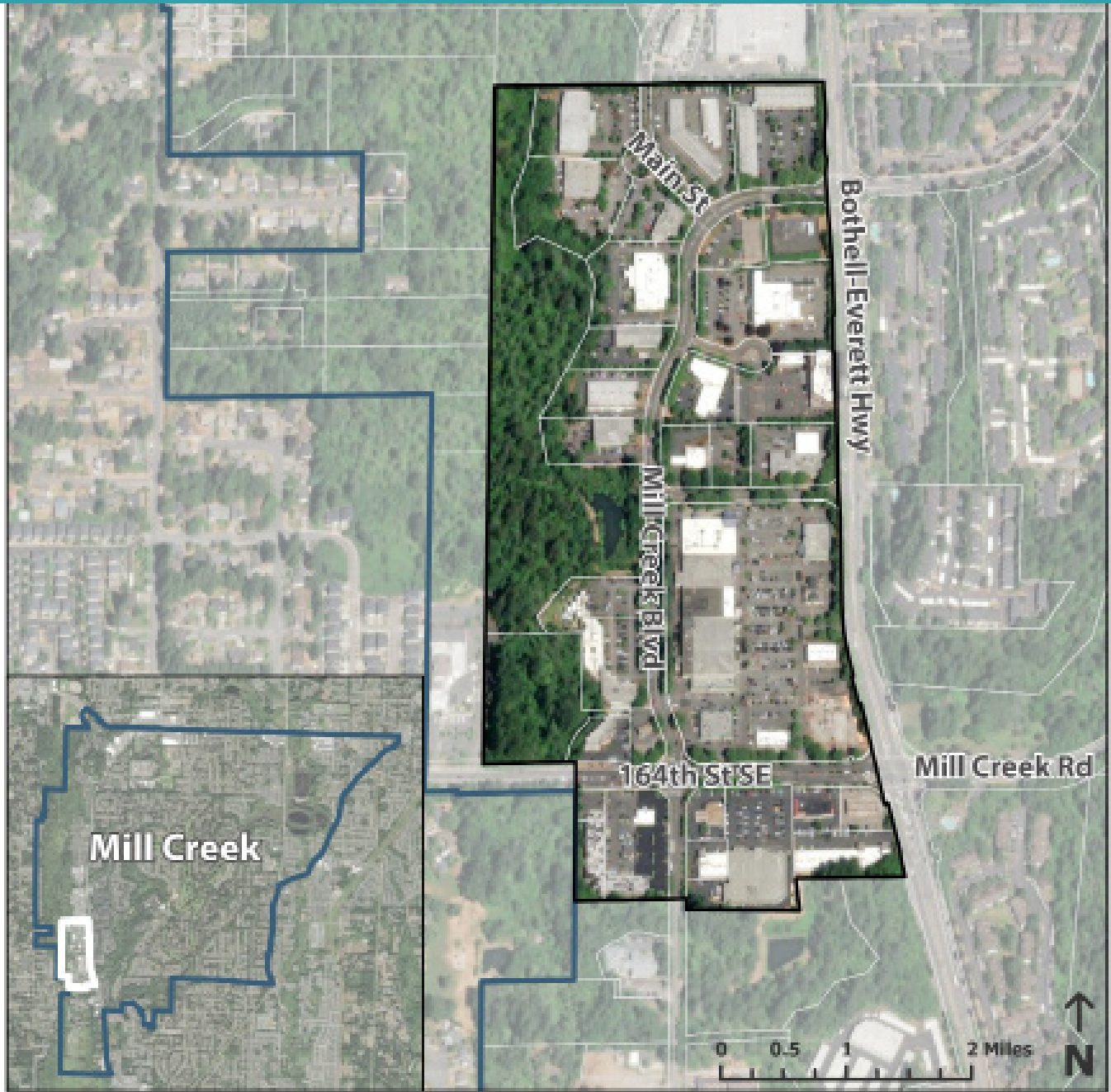
The following are identified as key priorities for future development within the South Town Center subarea:

- » Reinforce the visual cohesiveness with the adjacent Town Center Subarea by extending the zoning and design standards to the subarea.
- » Strengthen the character and identity of the subarea, through high quality design standards, to enhance its sense of place and its importance as a gateway to Mill Creek.
- » Leverage future subarea redevelopment opportunities to serve as the location to meet most of the population, housing, and employment targets allocated to Mill Creek by Snohomish County.
- » Develop updated design standards for Town Center and South Town Center to ensure housing and the mix of land uses are compatible and cohesive.



- » Allow for mixed use (residential, retail/commercial, office, public services) throughout the subarea in alignment with the market and the high demand for housing regionally.
- » Allow for a variety of housing types to provide housing options for various income levels including affordable options.
- » Support economic development, business vitality, and related employment opportunities in the subarea through land use and zoning changes.
- » Recognizing that future residents and employees in the subarea will help to support the economic vitality of Town Center and Mill Creek as a whole, support mixed use and create a specific economic development strategy for South Town Center.
- » Enhance multimodal connectivity between Town Center and South Town Center, expanding the pedestrian-friendly ambiance of Town Center to the south.
- » Address traffic congestion through multi-modal improvements and access to high-capacity transit to ensure that Mill Creek Boulevard is focused on serving local businesses and properties and not as a cut-through between 164th Street SE and SR 527 (Bothell-Everett Highway).
- » Leverage the proximity of the bus rapid transit system (Swift Orange Line and Swift Green Line) and the linkage to light rail in the I-5 corridor to support a complete center providing housing, jobs, services, and transportation connectivity.
- » Manage parking demand in the subarea, providing a sufficient level of parking based on land use types and zoning, while also encouraging and supporting access to transit, pedestrian and transit oriented development, bicycle connectivity, on-street parking, and shared parking.
- » Enhance public open spaces and streetscapes to provide opportunities for everyone in the community and promote multigenerational activities, with a focus on creating:
  - » An attractive multi-modal street network and a network of tree-lined streets, as well as connecting pedestrian and bicycle linkages (on-street and off-street);
  - » Greenways with healthy trees and vegetation and trails for walking and bicycling that connect to the North Creek Trail corridor, Town Center, and surrounding neighborhoods;
  - » An enhanced and expanded North Creek Trail corridor through the subarea;
  - » A well-designed regional stormwater system that enhances water quality, controls flows to area creeks, and improves habitat for fish and wildlife;
  - » An active use area surrounding the City's pond that relates to surrounding redevelopment; and
  - » Festival streets, public plaza spaces, and creating the Mill Creek Commons.

FIGURE 05. **South Town Center Location**



- South Town Center Subarea
- Mill Creek Parcels
- Mill Creek City Limits





## Areas Outside Subareas

The portions of the city located outside of the three subareas primarily have a residential land use designation. Business Park, Community Business, and Mixed-Use/High-Density Residential land use designations are found along arterial corridors and major intersections, and Parks and Open Space areas can be found scattered throughout the city.

These areas located outside of the city's subareas will not see as much growth as the subareas themselves, but they will still see a change. With the upcoming adoption of the Middle Housing regulations required by HB 1110 into the Mill Creek Municipal Code, the residential areas of Mill Creek will see more varied development. These changes will allow for additional housing types, including triplexes, stacked flats, courtyard apartments, and townhomes. This change may also result in higher density of development throughout residential areas; however, the code updates strive to maintain lower-scale, pedestrian-oriented, residential neighborhoods while still allowing for increased density that is needed to accommodate the City's allocated population and housing growth targets.



# HOUSING

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# Introduction

The purpose of the Housing element is to assess the housing status in the City of Mill Creek in regard to its condition, availability, and affordability in order to develop goals and policies that will ensure adequate housing is available to future residents of the City.

The City recognizes that if housing needs for its residents are addressed, it will contribute to the long-term stability and overall well-being of the community. It is essential for the City to not only work within the community, but on a regional basis, to create a coordinated effort in establishing an equitable distribution of housing for all needs and income levels. The City is planning for future housing needs while working to maintain the integrity and quality of existing residential neighborhoods. The City will continue to coordinate with Snohomish County and Puget Sound Regional Council to plan for equitable distribution of housing to fit the needs of the community and varying income levels.

Included in this element is an assessment of existing housing conditions, goals and policies to address the housing needs of the community, and strategies to maintain and provide adequate housing in the City of Mill Creek.

# HOUSING GOALS AND POLICIES

## GOAL H-1

Plan to accommodate a sufficient supply of housing throughout Mill Creek to meet the needs of all segments of the community, including moderate-income, low-income, extremely low-income, special needs households, and senior housing.



### POLICY H-1.2

Special needs groups include but are not limited to older adults and people with disabilities.

### POLICY H-1.1

Plan for consistency with housing unit targets, definitions, and regional growth strategy developed by Snohomish County, PSRC, and the Department of Commerce.

### POLICY H-1.2

Facilitate housing needs for special needs groups through partnerships with developers and service organizations.

### POLICY H-1.3

Identify risks of potential displacement of low-income households and historically marginalized populations through development, planning, and market pressures. Strive to mitigate these effects to the extent feasible, using guidance from the City's Racial Equity and Displacement Analysis Report.

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## **POLICY H-1.4**

Work to improve the city's jobs-housing balance by providing a variety of housing types and affordability levels for the city's workforce.

## **POLICY H-1.5**

Establish policies to support fair and equal access to housing for all persons regardless of race, color, religion, gender, sexual orientation, age, national origin, familial status, source of income, or disability.

## **POLICY H-1.6**

Consider the development of a Housing Action Plan for Mill Creek to create implementable strategies to meet the city's housing needs for all residents, including identifying and reducing barriers to special needs housing.

## GOAL H-2

Plan for a wide variety of housing types throughout the city, including single-family homes, moderate density housing types such as duplexes and ADUs, and multifamily units, to provide improved housing choices to all income levels and demographic groups in the Mill Creek community.



### POLICY H-2.1

Continue to allow Accessory Dwelling Units (ADUs) and middle housing types including duplexes in Mill Creek's low density residential areas to improve housing choice and affordability throughout the city.

### POLICY H-2.2

Create opportunities for more ownership housing in Mill Creek at a variety of income levels and in various housing types and locations.

### POLICY H-2.3

Work to reduce barriers to homeownership opportunities including for communities of color.

### POLICY H-2.4

Develop and refine Mill Creek's design and development regulations to preserve existing architectural character and support new development that is aesthetically consistent.



## GOAL H-3

Plan to accommodate Mill Creek’s new housing units at a variety of scales and in a variety of neighborhoods throughout the city, with an emphasis in designated subareas.



### POLICY H-3.1

Allow and encourage the development of moderate density and middle housing types in single-family residential zones to increase the variety of housing types.

### POLICY H-3.2

Create opportunities for new housing growth into designated Subareas and near High Capacity Transit to maximize transit investment, create high-quality, compact communities to improve walkability, reduce emissions, and provide access to high-quality employment and services.

### POLICY H-3.3

Encourage development of new housing with easy walkable or bikeable access to parks and open space to promote health and well-being.

#### POLICY H-3.3

See the Parks, Recreation, and Open Space element for more policies on promoting walkable access to parks.

## GOAL H-4

Plan to accommodate a sufficient capacity of regulated affordable housing units to meet regional goals and the needs of Mill Creek residents, recognizing that these units are unlikely to be built without significant subsidy.



### POLICY H-4.1

Encourage affordable housing development in the city through engagement and partnerships with developers, incentives, inclusionary zoning, fee waivers, and other strategies.

### POLICY H-4.2

Coordinate with surrounding jurisdictions, Snohomish County, and regional affordable housing nonprofits and coalitions such as the Alliance for Housing Affordability to provide housing for all economic segments of the community.

### POLICY H-4.3

Support the preservation, repair, and rehabilitation of existing housing stock, including regulated and naturally occurring affordable housing.

#### POLICY H-4.3

Naturally occurring affordable housing refers to housing that is 'affordable' but not subsidized by any federal programs. The rents are naturally low, relative to the regional and local housing market.

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# HOUSING SUPPORTING ANALYSIS

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## Washington State Growth Management Act (GMA)

The Washington State Growth Management Act requires a Housing element to be included in the Comprehensive Plan. The housing goal of the GMA is to “ Plan for and accommodate housing affordable to all economic segments.” RCW 36.70A.070(2) sets the requirements for a Housing element, which at a minimum, must address the

### following components:

- » An inventory and analysis of existing and projected housing needs by income level as provided by the Department of Commerce that identifies the number of housing units necessary to accommodate projected growth;
- » A statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement and development of housing, including policies for moderate density housing options in urban growth areas;
- » Identification of sufficient land for housing, including but not limited to, government-assisted housing, housing for low-income families, manufactured housing, group homes and foster care facilities;
- » Adequate provisions for existing and projected housing needs of all economic segments of the community, including documenting programs and actions needed to achieve housing availability, consideration of housing locations in relation to employment locations, and consideration of the role of accessory dwelling units (ADUs) in meeting housing needs; and
- » Identify policies and regulations that result in racially disparate impacts, displacement and exclusion, and implement policies and regulations that begin to undo these impacts. Also identify areas that may be at a higher risk of displacement and establish anti-displacement policies.

# Snohomish County Countywide Planning Policies

The City's Comprehensive Plan must be in agreement with the Countywide Planning Policies<sup>1</sup> developed by Snohomish County Tomorrow. These policies provide a framework for the development of the Comprehensive Plan and will help to ensure that the Comprehensive Plan will be consistent with the plans of the County and surrounding jurisdictions. See the Goals and Policies Alignment Matrix in the Appendix to read more about the Snohomish County Comprehensive Plan and associated Countywide Planning Policies.

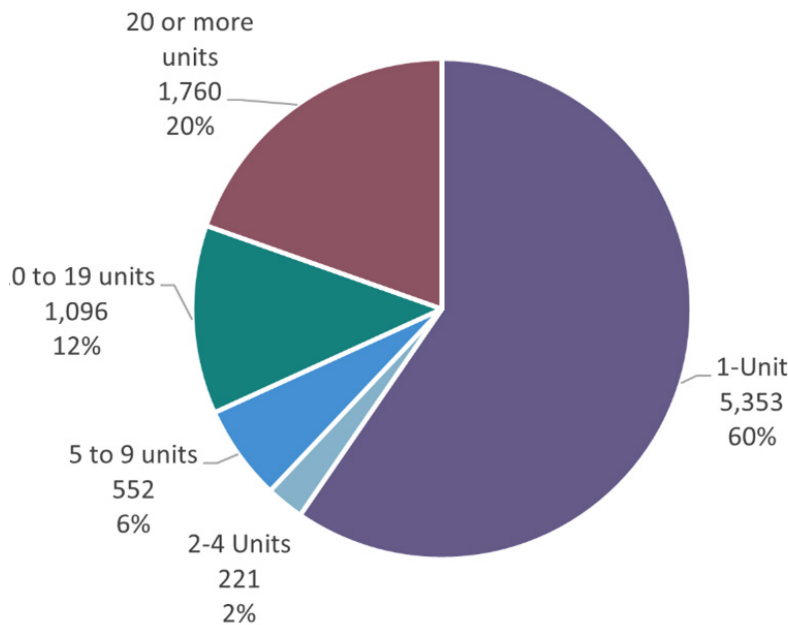
## Existing Conditions

### GENERAL HOUSING INVENTORY

As of 2023, the Office of Financial Management (OFM) reports a total of 9,449 housing units in Mill Creek. The majority of these, 60 percent, are single-family homes as shown below in Figure 1. About a third of housing units in the city are in buildings of 10 or more units.

<sup>1</sup> Snohomish County Countywide Planning Policies (CPPs), 2021.

FIGURE 01.  
**Housing Units in Mill Creek, 2022**



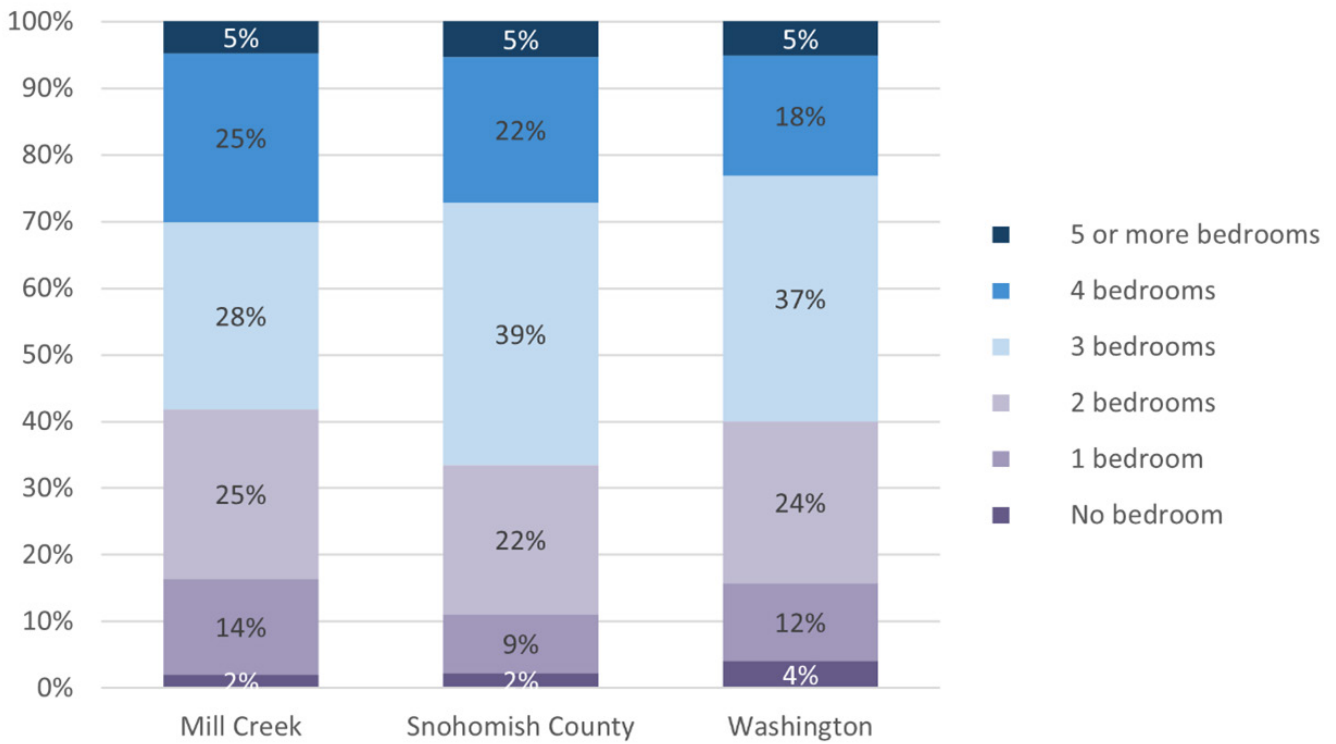
Source: 2022 American Community Survey 5-Year Estimates, Table DP04

According to American Community Survey (ACS) data (2022), Mill Creek’s housing units have fewer bedrooms than Snohomish County as a whole, but similar to statewide averages as shown in Figure 2. There is a larger share of four-bedroom units in Mill Creek than regional and statewide averages.



FIGURE 02.

### Housing Unit Size in Mill Creek, 2022

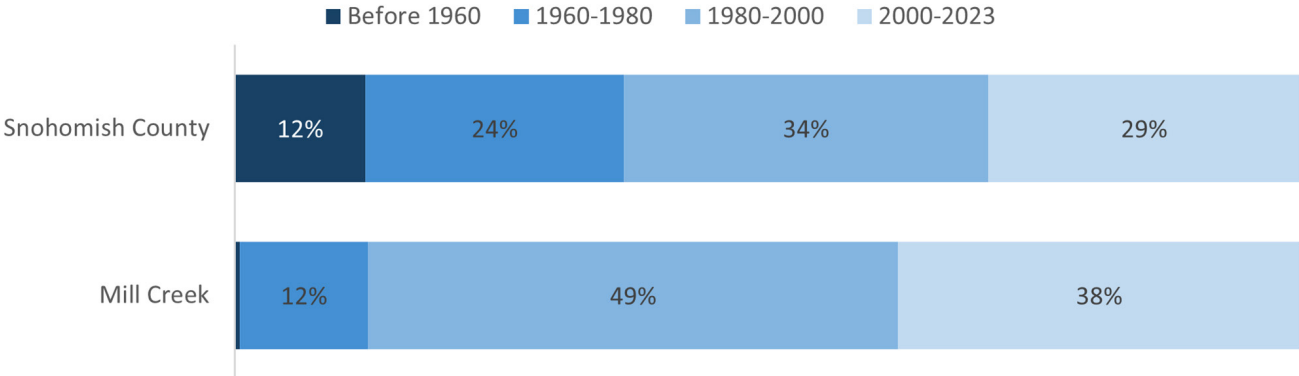


Source: 2022 American Community Survey 5-Year Estimates, Table DP04

Most housing in Mill Creek has been built since 1980, with about half of the housing units in the city built between 1980 and 2000. This is considerably newer housing stock than in Snohomish County as a whole, as shown below.

FIGURE 03.

### Year Housing Built in Mill Creek



Source: 2022 American Community Survey 5-Year Estimates, Table DP04



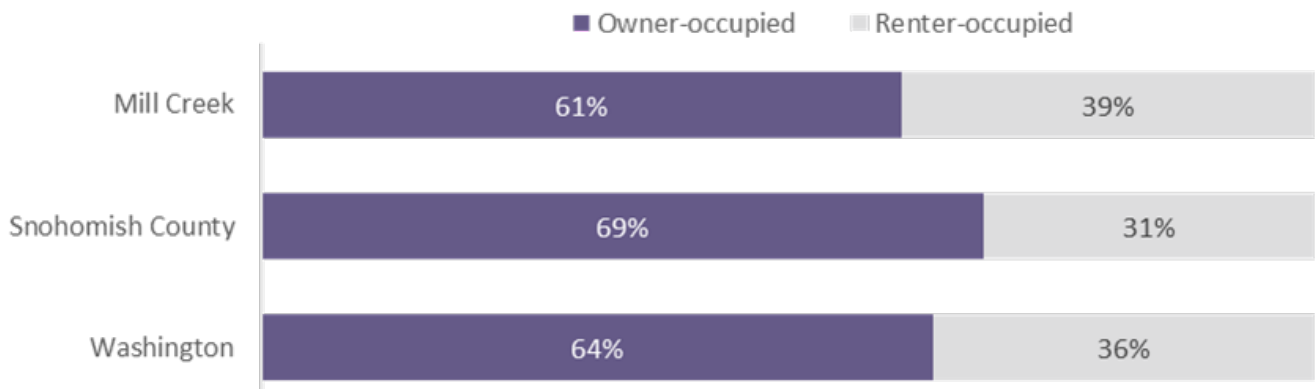
## HOUSEHOLD CHARACTERISTICS

There were 8,378 households in Mill Creek in 2022, according to ACS data. Nearly two-thirds of these were owner-occupied, but lower than state and county percentages, as shown below in Figure 4.

Mill Creek's average household sizes compared to those of Snohomish County and Washington State are shown in Figure 5. As of 2023, OFM reports an average household size of 2.46 people per household in Mill Creek. Snohomish County Tomorrow forecasts that Mill Creek's household size will decrease to 2.28 by 2044. This can have implications for future housing unit needs in the city.

FIGURE 04.

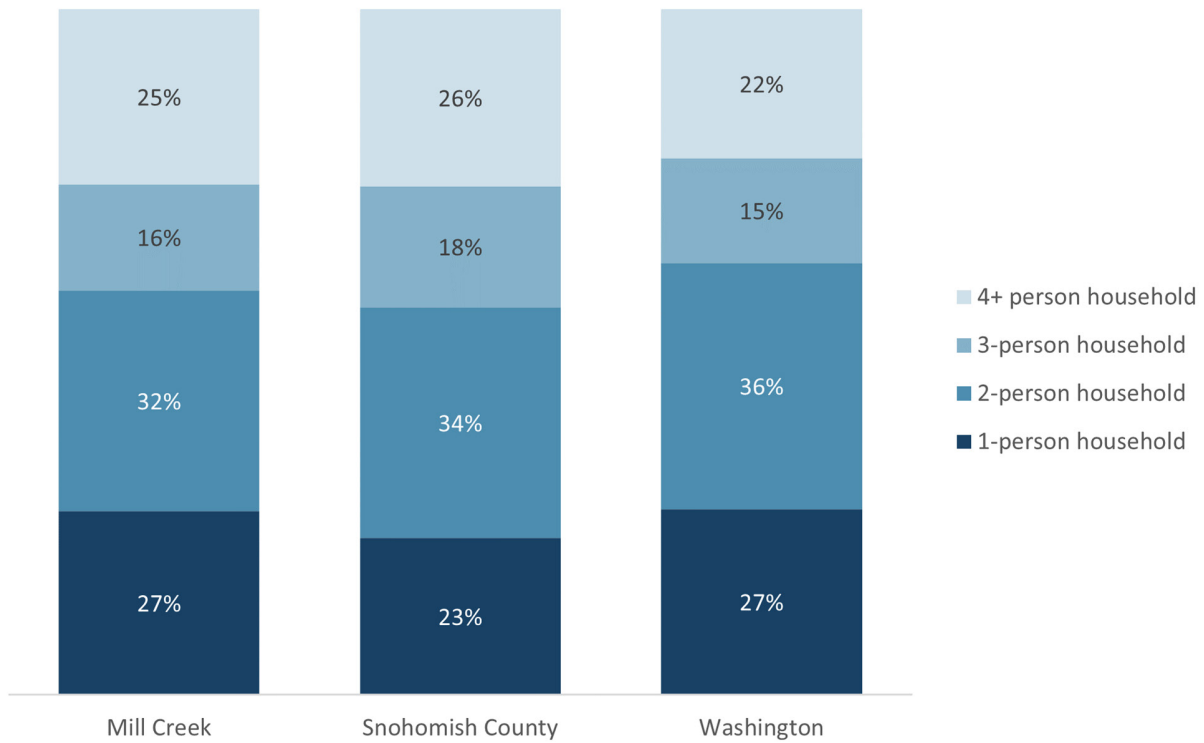
### Ratios of Owner-occupied and Renter-occupied Households, 2022



Source: Source: 2022 American Community Survey 5-Year Estimates, Table DP04

FIGURE 05.

## Mill Creek Household Size with Regional Comparison, 2022



Source: 2022 American Community Survey 5-Year Estimates, Table S2305

Affordable housing is defined by the U.S. Department of Housing and Urban Development as decent, safe housing that costs no more than 30 percent of a household's gross monthly income for mortgage/rent and utility payments. Households with incomes that fall below the median area income are less likely to be able to afford to purchase their own home or to be able to afford to rent an apartment. In the Puget Sound region, rapid population growth has led to higher demands for housing, which has in turn escalated housing costs and led to a decrease in

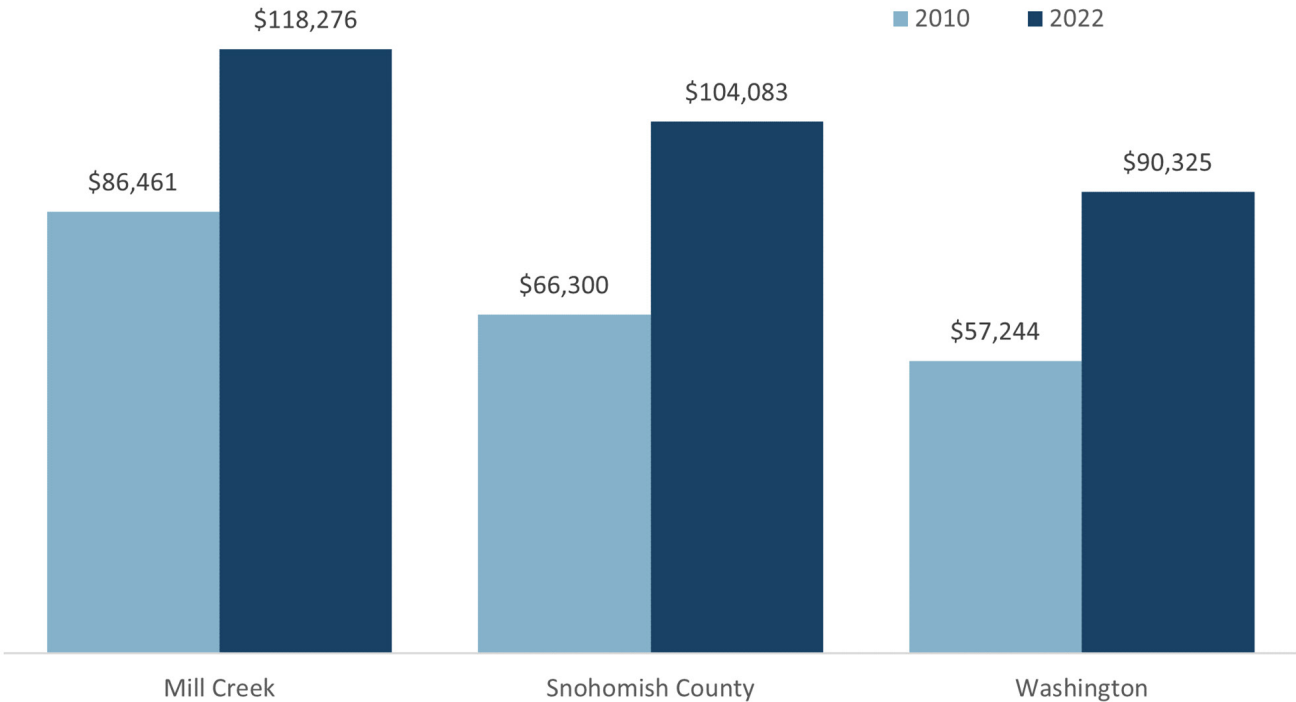
the availability of affordable housing. With less developable land available and higher costs for materials and labor, the cost of new housing has increased significantly. In addition, incomes have not increased enough to counteract the effects of inflation and rising home prices.

The Median Household Income (MHI) in Mill Creek has **increased 37 percent since 2010**, a smaller increase than in Snohomish County and statewide, although Mill Creek's MHI is considerably higher than county and statewide averages, as shown in Figure 6.



FIGURE 06.

### Median Household Income in Mill Creek, 2010-2022

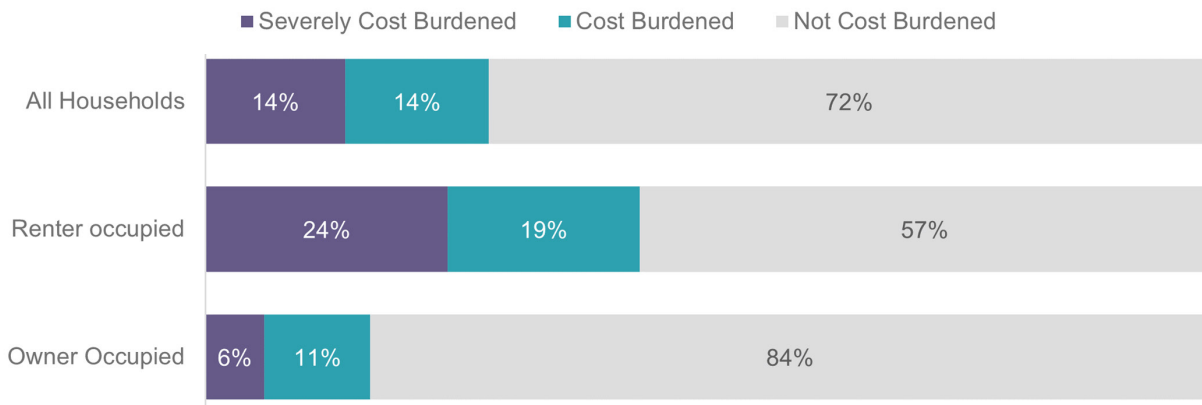


Source: 2022 American Community Survey, Table S2503



FIGURE 07.

## Cost Burden by Tenure in Mill Creek, 2020

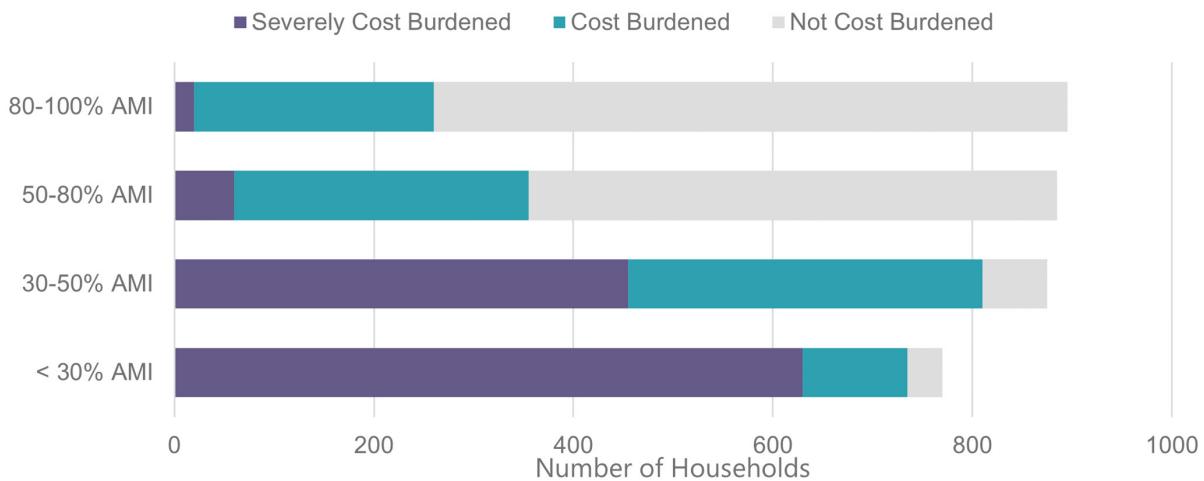


Source: 2016-2020 HUD CHAS (Comprehensive Housing Affordability Strategy)

The U.S. Department of Housing and Urban Development (HUD) uses “cost burden” as a metric to measure housing affordability. A household is considered cost-burdened if they spend more than 30 percent of their income on housing costs, and severely cost-burdened if they spend more than 50 percent of their income on housing costs. In Mill Creek, 28 percent of all households are cost-burdened, and half of these are severely cost-burdened. Renters face a higher rate of cost burden, with a quarter of renters in the city spending more than half their income on housing costs.

FIGURE 08.

## Cost Burden by Income in Mill Creek, 2020



Source: 2016-2020 HUD CHAS (Comprehensive Housing Affordability Strategy)

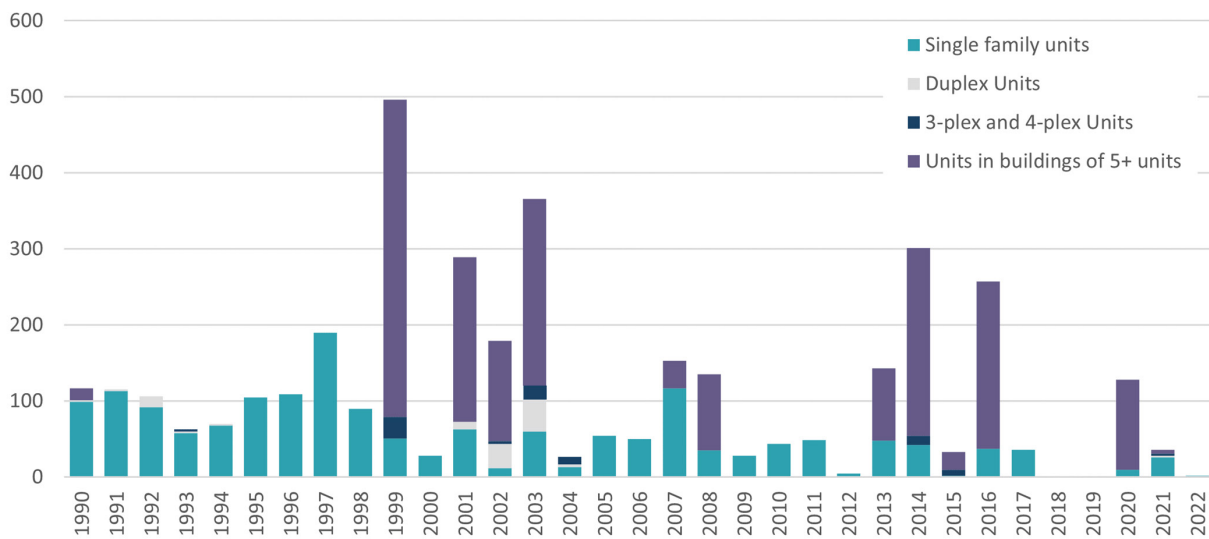
## HOUSING MARKET CONDITIONS

Census building permit data since 1990 is shown below in Figure 9. Housing development in Mill Creek has generally followed economic cycles, with a drop-off in production after the 2007-2008 recession and a subsequent rebound in the mid-2010s. Overall, housing production has slowed in recent years, although the share of multifamily to single-family production has increased gradually over the decades.



FIGURE 09.

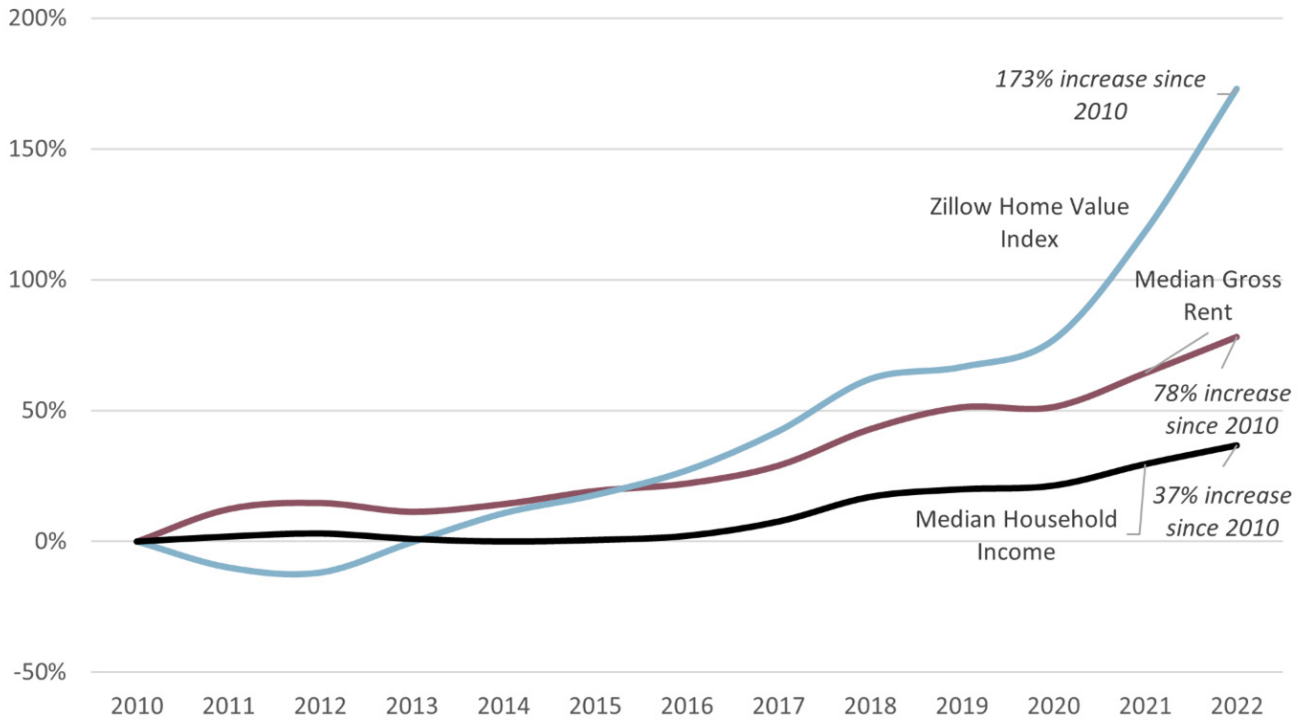
### Building Permits in Mill Creek, 1990-2022



Source: US Census Building Permits Survey

FIGURE 10.

## Change in Incomes, Housing Prices, and Rents in Mill Creek, 2010-2022



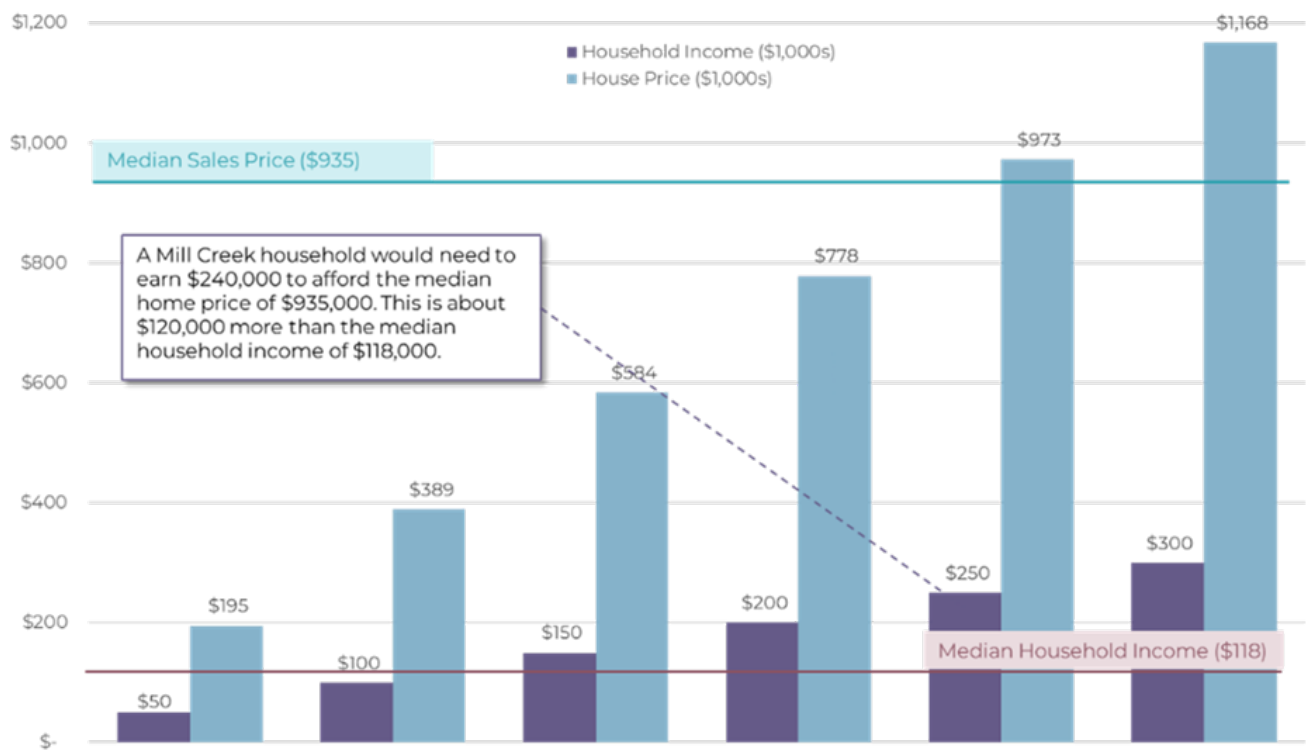
Source: 2022 American Community Survey, Tables S2503, DP04; Zillow

Housing prices have increased considerably **more rapidly than incomes** in recent years, particularly since the COVID-19 pandemic. This is particularly true for owner-occupied housing, which has nearly doubled in price since 2010. Figure 10 shows the change in housing prices, rents, and incomes in Mill Creek since 2010, and shows that housing in the city, particularly ownership housing, has become increasingly out of reach for Mill Creek residents.

Figure 11 compares various household income levels with the price of housing that households at each income level could afford. Based on 2022 data, Mill Creek’s median household income (\$118,000) and median home sales price (\$935,000) are shown in purple and green lines, respectively. The median sales price of homes in Mill Creek **would not be affordable** to the average household in the city. The median household could afford a home worth about **\$460,000** based on current interest and tax rates. However, the median home prices is **more than double** that amount, at **\$935,000**.

FIGURE 11.

### Incomes and Housing Prices in Mill Creek, 2022



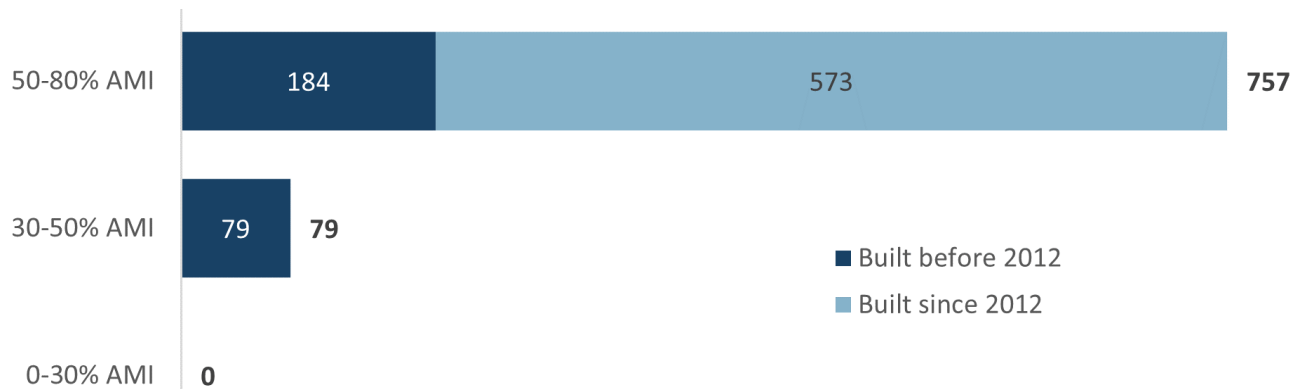
Source: 2022 American Community Survey, Table S2503, Zillow, Freddie Mac, Leland Consulting Group

## SPECIAL HOUSING INVENTORY

The Puget Sound Regional Council (PSRC) tracks subsidized units in the four-county (King, Pierce, Snohomish, and Kitsap) region. The charts in Figures 12 and 13 show the number of subsidized units in Mill Creek by the income level served (as a percentage of AMI) as well as by the number of bedrooms. Additionally, the data is broken down by units placed into service in the past 10 years and prior. Most of Mill Creek’s subsidized units have been built in the past decade. This data is taken from PSRC’s latest subsidized housing inventory, and shows units active as of December 31, 2021.

FIGURE 12.

### Subsidized Units in Mill Creek by Percentage of Area Median Income Served, 2021



Source: PSRC Income-Restricted Housing Inventory

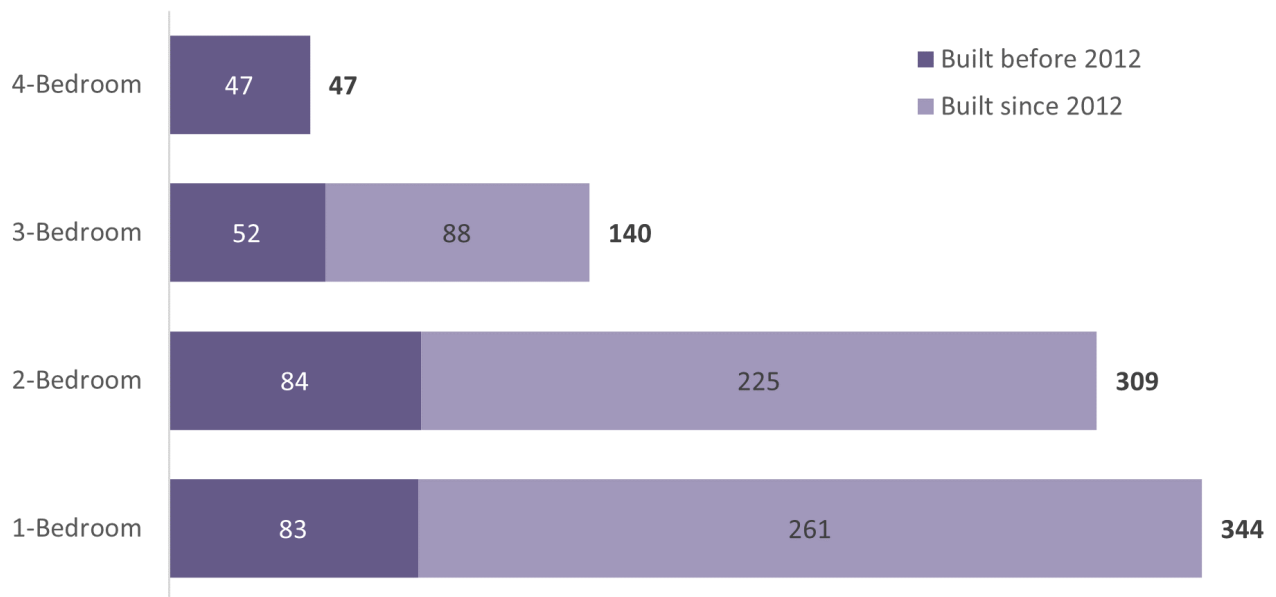
AMI means Area Median Income, which is the midpoint of an area’s income distribution, meaning that half of the households in an area earn more than the median and half earn less than the median.





FIGURE 13.

### Subsidized Units in Mill Creek by Percentage of Area Median Income Served, 2021



Source: PSRC Income-Restricted Housing Inventory



# Gap Analysis, Land Capacity, and Adequate Provisions

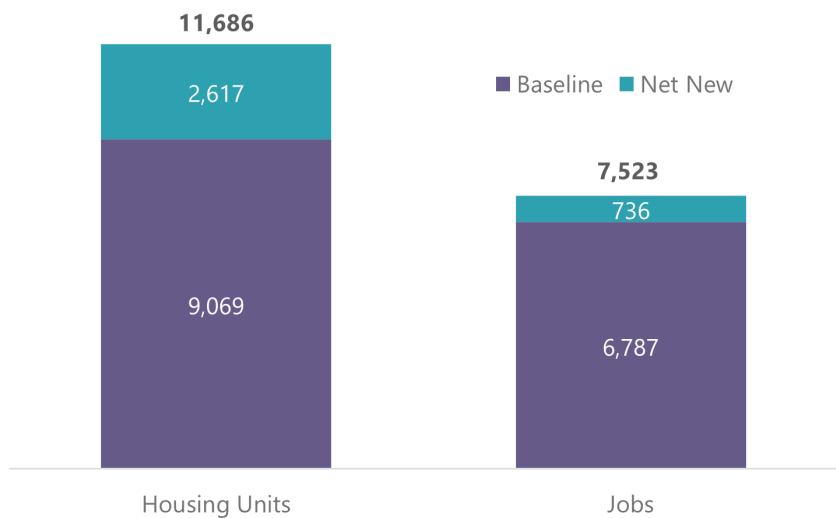
As part of this Comprehensive Plan update, a Gap Analysis and Land Capacity Analysis (LCA) has been developed for housing units and jobs, including considerations of housing by income band as required by RCW 36.70A.070(2)(c) and adequate provisions for meeting all housing needs as required by RCW 36.70A.070(2)(d). The LCA Methodology and Results are included in the Appendix with further detail on the levels of analysis performed.

Mill Creek is required to show land capacity to meet 2020-2044 targets for housing units and jobs based on the Washington Office of Financial Management countywide projections as allocated to jurisdictions through the Countywide Planning Policies.

Mill Creek's baseline and target housing units and jobs are shown in Figure 14.

FIGURE 14.

## Mill Creek Baseline and Target Housing Units and Jobs, 2019/20-2044



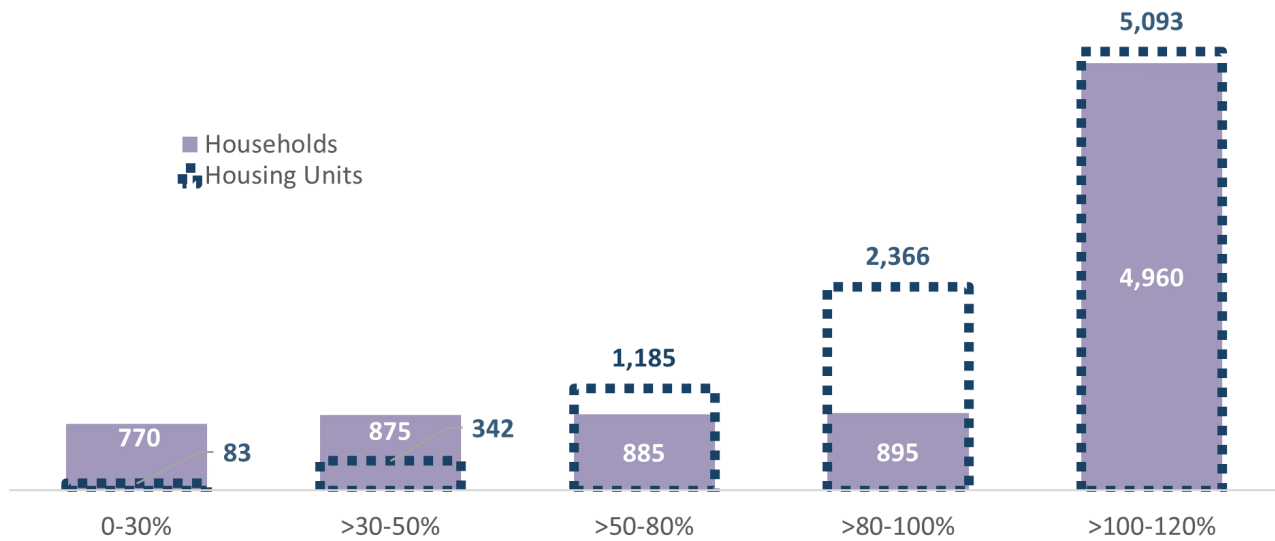
Source: Snohomish County Countywide Planning Policies (Effective March 6, 2022)



Figure 15 shows a comparison of Mill Creek’s **housing unit stock** (shown based on the income band served by the housing units as a percentage of AMI) and **households by income** (also as a percentage of AMI), as of 2020. Mill Creek has a **shortage of housing units affordable to lower-income households earning under 50 percent AMI** compared to the number of low-income households in the city. There is a surplus of units for households earning 50-100 AMI, and the housing stock and households earning more than 100 percent AMI are closely matched. This shows a need for housing for more lower-income households in the city and corroborates the data presented earlier in this report on cost-burden, which showed that many lower-income households are spending **more than they can afford** on housing costs.

FIGURE 15.

### Households and Housing Units by Income Band in Mill Creek, 2020



Source: 2016-2020 HUD Comprehensive Housing Affordability Strategy (CHAS), WA Department of Commerce Housing Planning for All Tool (HAPT)

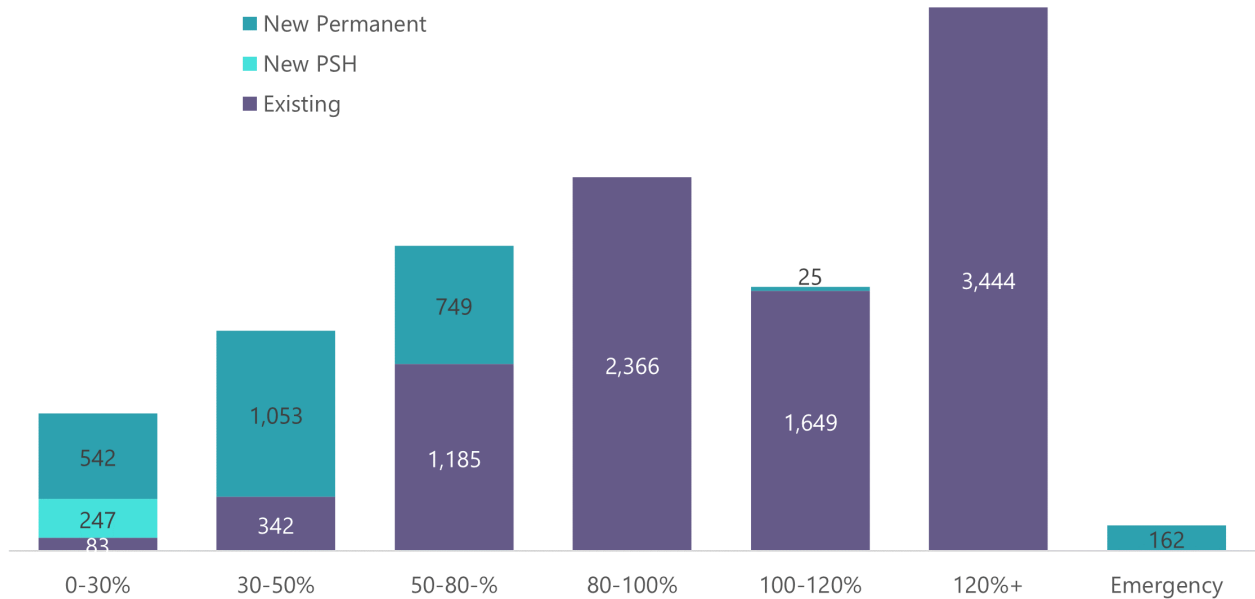
Figure 16 shows Mill Creek’s **targets** for housing units by income band for the 2020-2044 planning period. These targets were developed by Snohomish County Tomorrow, based on Department of Commerce guidance and OFM population projections for the County. Mill Creek must show capacity and plan to accommodate **most of its units at lower income levels, primarily under 80 percent AMI**, including capacity for 247 new units of PSH.

**Under current zoning, Mill Creek does not have sufficient capacity** to meet these targets; however, the city is proposing to rezone South Town Center (formerly known as the Mill Creek Boulevard Subarea) as part of this Comprehensive Plan update, which will provide sufficient capacity to meet these housing targets by income level. A full discussion of Mill Creek’s land capacity to reach these targets can be found in the “Land Capacity Analysis Methodology and Results” in the Appendix.

**PSH means Permanent Supportive Housing. In Washington state, permanent housing is a general term for rental apartments or homes that provide a fixed address, while PSH is a specific type of permanent housing that offers long-term support services for people, such as those who may be at risk of homelessness.**

FIGURE 16.

### Mill Creek Existing and Target Housing Units by Income Band, 2019-2044



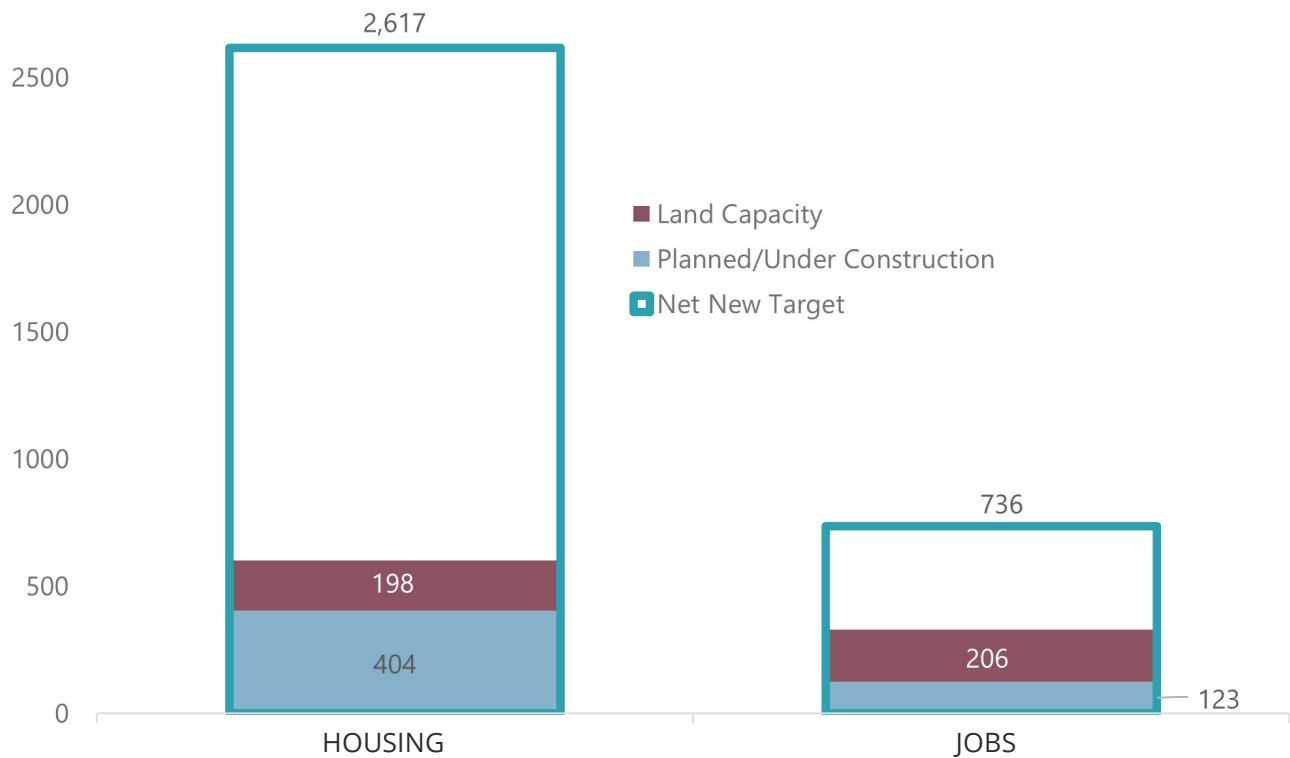
Source: Snohomish County 2023 Housing Characteristics and Needs Report (HO-5), Appendix G, p. 16 (p. 397 of combined HO-5 Appendices)

## Land Capacity Analysis

The initial results of Mill Creek’s land capacity analysis for housing and jobs are shown below in Figure 17. As shown, the city has a deficit of capacity to meet housing unit and job growth targets under current zoning.

FIGURE 17.

### Mill Creek Initial Net New Land Capacity for Housing and Jobs, 2019/20-2044



Source: City of Mill Creek, Snohomish County, Leland Consulting Group

In order to address this shortfall, housing unit and job capacity was adjusted within the South Town Center Subarea. As part of the 2024 Comprehensive Plan update, the Subarea land use and zoning designations have been changed to allow for higher-density multifamily and mixed-use development. This area was previously zoned for relatively low-density commercial

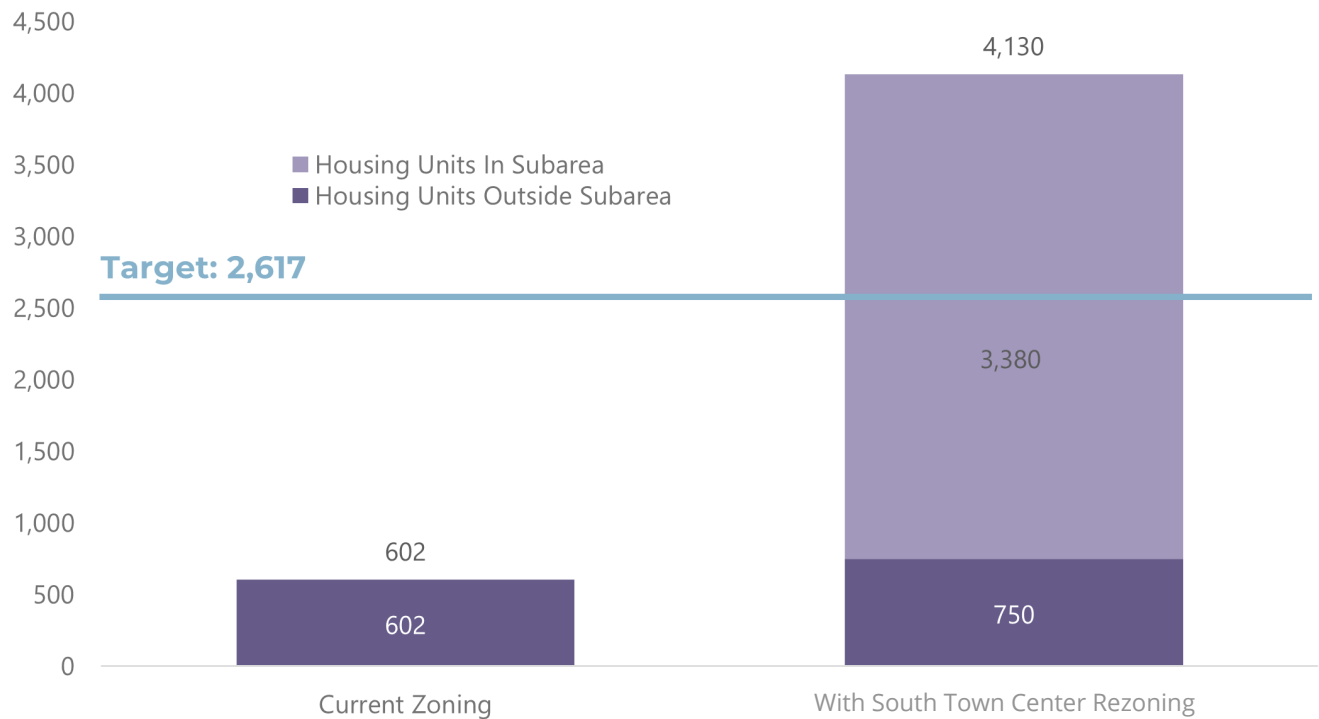
development and was part of a subarea planning effort in 2022 to envision a more intense use of this area. With its proximity to the recently constructed Swift Orange Line, a bus rapid transit route that connects to the Link light rail station in Lynnwood, the City has decided to increase capacity in this area to meet the targets for housing units and jobs.

## REVISED SCENARIO AND RESULTS

In the revised land capacity analysis, the South Town Center Subarea was assumed to redevelop at a density consistent with averages drawn from a study of podium mixed-use developments throughout the Puget Sound region. Since the economics of the land value of parcels in the subarea would be significantly affected by rezoning, improvement-to-land value was not used to calculate propensity for redevelopment. Instead, an additional 10 percent market reduction factor was applied on top of the 25 percent used in the previous analysis. The revised housing and job density numbers, acreage, and reduction factors are shown in Figures 18 and 19.

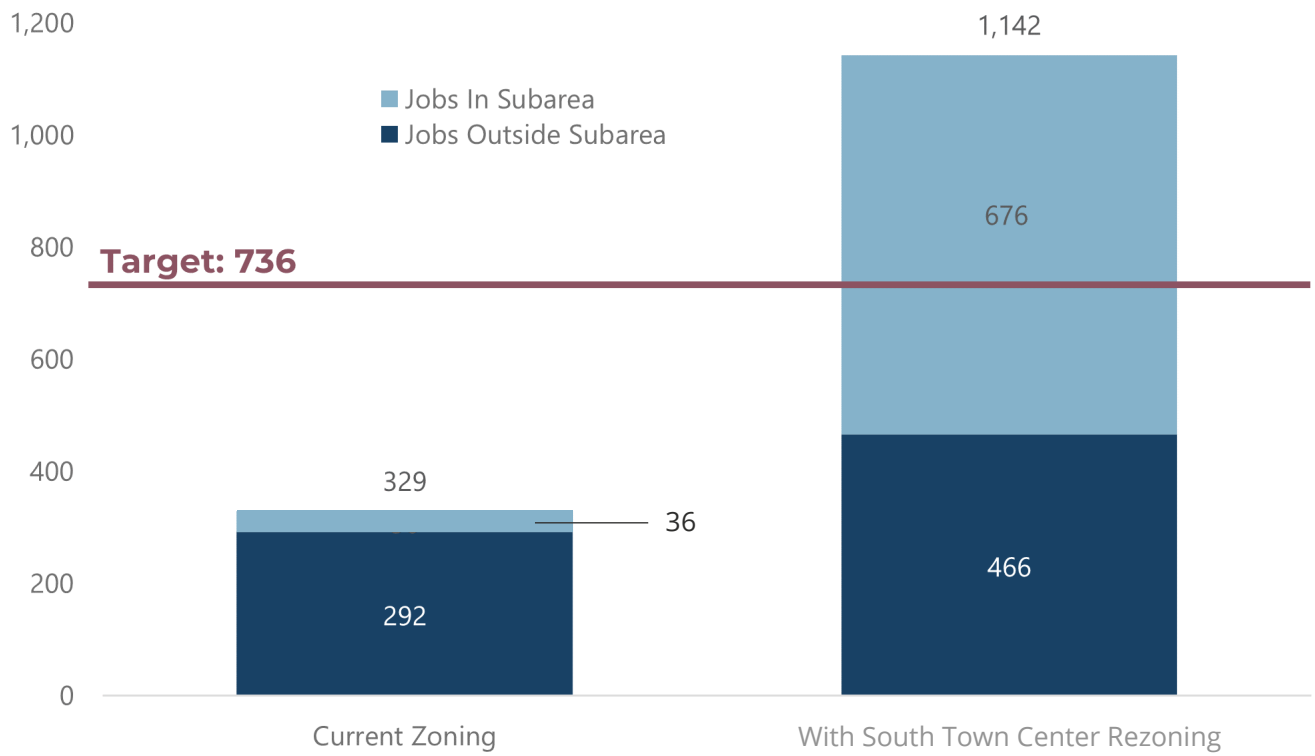
FIGURE 18.

### Net New Housing Unit Capacity in Mill Creek, 2020-2044



Source: City of Mill Creek, CoStar, Urban Footprint, Snohomish County, Leland Consulting Group

FIGURE 19.  
**Net New Job Capacity in Mill Creek, 2020-2044**



Source: City of Mill Creek, CoStar, Urban Footprint, Snohomish County, Leland Consulting Group



**Northpointe Development** includes a mixture of housing types from single dwelling to 5-plex buildings

TABLE 01.

## Historic and Target Housing Production Trends in Mill Creek

INCOME BAND	ZONE CATEGORY	HOUSING NEEDS	AGGREGATED HOUSING NEEDS	ANNUAL UNIT PRODUCTION NEEDED 2020-2044	HISTORIC ANNUAL AVERAGE UNIT PRODUCTION 2013-2022	BARRIER EXISTS?
<b>0-30 PSH</b>	Low-Rise, Midrise	247				
<b>0-30 Non PSH</b>	Low-Rise, Midrise	542				
<b>30-50</b>	Low-Rise, Midrise	1,053	2,591	108	71	Yes
<b>50-80</b>	Low-Rise, Midrise	749				
<b>80-100</b>	Moderate Density	0	25	1	3	No
<b>100-120</b>	Moderate Density	25				
<b>120+</b>	Low Density	0	0	0	20	No

Source: Snohomish County, City of Mill Creek, U.S. Census Building Permit Survey, PSRC Income-Restricted Housing Inventory

The Department of Commerce has developed a checklist for cities to address four categories of barriers to housing production:

- » Development regulations
- » Process obstacles
- » Limited land availability and environmental constraints
- » Funding gaps

Cities should document how these barriers may be affecting the production of units at the income level specified using this checklist, and document the potential steps they could take to overcome the barriers. Note that cities do not need to implement these steps as part of the comprehensive plan update, but they can help guide goal and policy development and cities will

be required to produce a report documenting their progress towards increasing housing production five years after the adoption of the comprehensive plan.

The adequate provisions checklist and potential actions to remove barriers to housing production are found in the Appendix.

Mill Creek intends to address code related barriers through modifications to the Mill Creek Municipal Code to be adopted in 2025.

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# Implementation Strategies

In 2022, the City of Mill Creek received a Middle Housing grant from the Washington State Department of Commerce. The grant program was authorized supplemental state operating budget and was developed to support the adoption of ordinances authorizing middle housing types, along with conducting a racial equity and displacement report. The intent is for cities to study their existing housing conditions, plan for a greater variety of housing types, and identify any communities that may be at risk of racial discrimination or displacement.

The Middle Housing Menu of Options report builds off the Racial Equity and Displacement Analysis Report and feedback from community engagement (see Appendix for these reports). The City of Mill Creek is not obligated to take any of the actions proposed in the report. However, the report should provide the City with great ideas and tools it can consider as part of the 2024 Comprehensive Plan update.

The Racial Equity and Displacement Analysis Report (included in the Appendix) includes an analysis of racially disparate impacts, exclusion in housing, and displacement risk caused by local policies, plans, and actions. The report analyzes existing City policies, plans, and actions, and makes recommendations to address any impacts that were identified in the analysis, including the recommendation of anti-displacement strategies and programs.

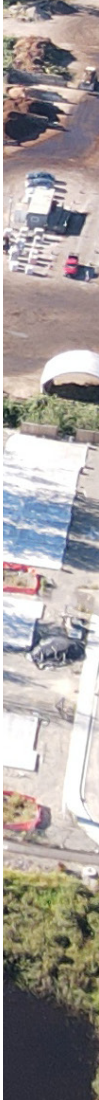
The purpose of the report is to analyze the City of Mill Creek Code to develop a menu of strategies and implementing actions the City could take to support more middle housing, affordable housing options, and proactively address residential and business displacement. This includes recommendations for changes to current policies, regulations and zoning, fee structures, housing incentives, and permitting procedures and processes. Considering these options in parallel with policy recommendations would also have the benefit of addressing housing exclusion.<sup>2</sup>

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<sup>2</sup> City of Mill Creek – Middle Housing Menu of Options Report, LDC Inc., June 2023



# ENVIRONMENT





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# Introduction

**The objective of the Environment element is to provide policy guidance for the long-term preservation of environmentally critical areas. The policies established in this chapter are based upon analysis of existing conditions, regulatory frameworks, and community values. The City uses Best Available Science to update the information provided.**

Understanding existing conditions forms the foundation for identifying key environmental issues. These issues are addressed through policies focused on both general and specific areas of environmental resource protection. The goals and policies of this element are subsequently implemented through development regulations.

Mill Creek was originally developed in the 1970s as a planned residential community in a natural setting. Neighborhoods were built around an extensive system of open space corridors and a golf course, and the City was surrounded by undeveloped land. The retention of natural areas such as wetlands and stream corridors contribute greatly to the quality of life in Mill Creek.

The Puget Sound region has seen significant growth in the last several decades, and with the advent of Growth Management in the early 1990s, development has been focused within established Urban Growth Areas. Urban development within Mill Creek and its Municipal Urban Growth Area increases pressure on the natural environment.

The listings of Chinook salmon and steelhead as a threatened species under the Federal Endangered Species Act, as well as the state requirement for jurisdictions to incorporate Best Available Science into their environmentally critical areas regulations, has brought increased attention to the impacts of development upon natural systems. In the face of increased growth and the need to comply with these and other environmental regulations, Mill Creek will continue to work to protect the natural environment as part of future development

# ENVIRONMENT

## GOALS AND POLICIES

### GOAL ENV-1

Maintain an attractive and high-quality environment and improve air and water quality, soils, and natural systems to ensure the health and well-being of people, animals, and plants through creative design, landscaping, and control of impacts.



#### POLICY ENV-1.1

Protect Mill Creek's image, which is characterized by an abundance of natural vegetation indigenous to the northwest, by encouraging new development to retain vegetation to the furthest extent feasible. If infeasible ensure new development provides landscaping that emphasizes the use of native plant materials (including drought resistant species), achieves compatibility between varied uses, and provides attractive entrances into the city.

#### POLICY ENV-1.2

Preserve natural vegetation that significantly contributes to the aesthetic values and adds to the natural scenic views of Mill Creek. Require all new developments to establish planted buffers or preserves adjacent to arterial and collector streets, consistent with the City's subdivision regulations and Design Review Board guidelines.

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### **POLICY ENV-1.3**

Work to maintain and improve air and water quality and ensure all residents have equitable access to clean air, clean water, and a healthy natural environment.

### **POLICY ENV-1.4**

Reduce impacts to vulnerable populations and areas that have been disproportionately affected by noise, air pollution, or other environmental or climate change impacts.

### **POLICY ENV-1.5**

Protect and enhance the urban tree canopy and native vegetation to support community resilience, mitigate urban heat, manage stormwater, protect habitat, conserve energy, improve mental and physical health, and strengthen economic prosperity.

### **POLICY ENV-1.6**

Support the use of integrated pest management and reduce the use of toxic pesticides, fertilizers, and other harmful products that present a risk to the health of the environment and humans.

### **POLICY ENV-1.7**

Establish and support programs that mitigate climate change and manage and reduce the spread of terrestrial and aquatic invasive species that are harmful to natural ecological functions.

## GOAL ENV-2

Continue to be good stewards of the environment by taking appropriate measures to reduce the environmental impacts of future development and City operations.



### POLICY ENV-2.1

Support private and public efforts to obtain conservation easements in areas with natural features such as creek corridors, wetlands, significant vegetated backdrops, scenic vistas, and wildlife habitat.

### POLICY ENV-2.2

Use integrated and interdisciplinary approaches for environmental planning and assessment.

### POLICY ENV-2.3

Work with neighboring jurisdictions and tribes to identify and protect open space networks and wildlife corridors throughout the city and municipal urban growth area through appropriate regulations or other mechanisms such as public acquisition, easements, voluntary agreements, supporting the efforts of conservation organizations, and other best practices.

### POLICY ENV-2.4

Protect, enhance, and restore ecosystems in order to meet tribal treaty rights and conserve culturally important consumptive and non-consumptive resources (including foods and medicinal plants) that could be adversely impacted by climate change.

#### Policy ENV-2.3

See the Parks element for more information about the acquisition of open spaces.

## GOAL ENV-3

Promote high standards of environmental protection and mitigation, including sensitive treatment and preservation of the natural environment and critical areas based upon best available qualitative and quantitative information available including Best Available Science rules.



### POLICY ENV-3.1

Ensure that land development activities avoid straightening, channelizing, and rerouting existing drainage courses and that structures and impervious surfaces are set back from streams and wetlands so that riparian vegetation and wetland buffers are maintained in a naturally vegetated condition. Encourage low impact development techniques.

### POLICY ENV-3.2

Enhance, restore, protect, and avoid alteration of wetlands, streams and associated buffers, retaining these features in their natural state to preserve wildlife habitat, maintain hydrologic functions, and protect water quality and quantity.

### POLICY ENV-3.3

Ensure that buffer widths for streams and wetlands meet or exceed the minimum width necessary to protect the integrity, function, and value of the resources and are based upon Best Available Science rules adopted by the State of Washington.

#### Policy ENV-3.3

Best Available Science rules can be found in RCW 36.70A.172 and WAC 365-195, part 9.

### **POLICY ENV-3.4**

Only allow alteration of wetlands and streams after it has been demonstrated that no design alternative exists to afford reasonable economic use of the property and when compensatory mitigation is provided that adequately compensates the hydrologic functions, water quality functions, and lost wildlife habitat. Proposals to alter wetlands and streams shall reflect and incorporate Best Available Science rules.

### **POLICY ENV-3.5**

Protect streams, wetlands, and their associated buffers in perpetuity through the use of tracts, conservation easements, or other means to achieve permanent protection.

### **POLICY ENV-3.6**

Clearly identify wetlands and other watercourses on development site plans and City Critical Areas Maps.

### **POLICY ENV-3.7**

Comply with and implement Critical Areas Regulations based upon Best Available Science rules and with consideration of the presence of threatened or endangered species.

### **POLICY ENV-3.8**

Designate, protect, and enhance significant open spaces, natural resources, and critical areas.

### **POLICY ENV-3.9**

Protect and restore wetlands and corridors between wetlands, to provide biological and hydrological connectivity that fosters resilience to climate impacts.



## GOAL ENV-4

Develop and enforce policies and regulations that protect habitat within North Creek and its tributaries to support healthy wildlife and accelerate the recovery of salmon and other threatened and endangered species.



### POLICY ENV-4.1

Work collaboratively to identify and protect valuable fish and wildlife habitat throughout the city. Look for gaps or inefficient practices in the land use plan and development regulations that could impede climate resilience and address these with updated provisions.

### POLICY ENV-4.2

Work cooperatively with other agencies to implement a comprehensive, science-based recovery plan for federally-listed threatened or endangered species and also include protection for and restoration of habitat areas that support designated species of local or state significance.

### POLICY ENV-4.3

Preserve and establish buffer zones with native vegetation and trees that are resilient to climate change between developments and watercourses to protect the integrity of the aquatic systems, to enhance water quality, and to ensure adequate habitat for fish and wildlife.

### POLICY ENV-4.4

Aim for no net loss of ecosystem composition, structure, and functions and strive for net ecological gain to enhance climate resilience for species under stress from climate change including cold-water fish.

## GOAL ENV-5

Minimize development impacts to natural features by encouraging the use of low impact development techniques, collaboration with watershed planning, and other innovative environmentally sensitive development practices, design, materials, construction, and on-going maintenance.



### **POLICY ENV-5.1**

Protect and restore natural hydrological functions and water quality to maximize the ecological benefits and climate resilience of riparian ecosystems.

### **POLICY ENV-5.2**

Educate residents on issues pertaining to fish and wildlife and the protection of habitats of threatened populations.

### **POLICY ENV-5.3**

Educate residents about water quality and quantity management issues and incentivize environmental stewardship on private and public lands to protect and enhance wetlands, streams, and other watercourses that provide habitat and drinking water supplies.

### **POLICY ENV-5.4**

Ensure compliance with the National Pollutant Discharge Elimination System (NPDES) Permit and that land developments include stormwater management that meet the requirements of the Washington State Department of Ecology Stormwater Management Manual adopted by the City.



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## **POLICY ENV-5.5**

Continue efforts with regional coalitions, Snohomish County, and other jurisdictions to comply with and promote erosion and stormwater control measures, reduce pollution, and improve water quality throughout the city and the municipal urban growth area.

## **POLICY ENV-5.6**

Manage water resources sustainably in the face of climate change through smart irrigation, stormwater management, preventative maintenance, water conservation and wastewater reuse, plant selection that prioritizes native and drought tolerant species, and landscape management.

## GOAL ENV-6

Meet all air quality standards, respond and adapt to the impacts of climate change, and minimize greenhouse gas emissions in support of federal, state, regional, and local emissions reduction goals, including targets adopted by the Puget Sound Clean Air Agency.



### **POLICY ENV-6.1**

Support the achievement of regional greenhouse gas emissions reduction targets through land use decisions, development regulations, and by expanding the use of conservation and alternative energy sources, electrifying the transportation system, and reducing vehicle miles traveled by increasing alternatives to driving alone.

### **POLICY ENV-6.2**

Protect and restore natural resources that sequester and store carbon such as forests and wetlands.

### **POLICY ENV-6.3**

Advance actions that support resilience and adaptation to climate change impacts by identifying and addressing the impacts of climate change and natural hazards on water, land, infrastructure, health, and the economy. Prioritize actions to protect the most vulnerable populations.

### **POLICY ENV-6.4**

Plan for new and relocation of existing essential public facilities and hazardous industries away from the 500-year floodplain, where feasible.

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## **POLICY ENV-6.5**

Support the implementation of the Washington State’s climate change initiatives and work toward developing a common framework to analyze climate change impacts when conducting environmental review under the State Environmental Policy Act.

## **POLICY ENV-6.6**

Develop and maintain City staff members’ technical expertise and skills related to climate change and environmental justice to support communitywide implementation of equity and resilience.

## **POLICY ENV-6.7**

Develop and implement an urban heat resilience strategy that includes land use, urban design, urban greening, and waste heat reduction actions.

## **POLICY ENV-6.8**

Participate with regional transit and other transportation agencies to promote and encourage carpooling, ridesharing, and other public and private transportation programs that result in improved air quality in Mill Creek, the North Creek Basin, and surrounding region.

## **POLICY ENV-6.9**

Participate in and coordinate with the Puget Sound Air Pollution Control Authority to ensure that all wood stoves installed for use in new homes meet the applicable U.S. Environmental Protection Agency and state standards.

## **POLICY ENV-6.10**

Encourage the Puget Sound Air Pollution Control Agency to establish a monitoring station within the North Creek Drainage Basin to ensure that the air quality remains within acceptable standards.



## GOAL ENV-7

Consider and address the potential for human-caused risks and the natural environment's capacity to absorb and reduce the impacts of natural hazard events.



### POLICY ENV-7.1

Develop resilience hubs, create evacuation plans, and develop and implement notification alerts to prepare for emergency events.

Resilience hubs are community-serving facilities augmented to support residents, coordinate communication, distribute resources, and reduce carbon pollution while enhancing quality of life.

## GOAL ENV-8

Establish and/or support programs that work to reduce greenhouse gas emissions and increase energy conservation, including the retrofit of existing buildings, expansion of alternative and clean energy use within the public and private sector, and the use of environmentally sustainable building techniques and materials.



### POLICY ENV-8.1

Ensure that land clearing, grading, and filling practices minimize soil erosion and sedimentation into streams, wetlands, and other watercourses. Ensure that all required temporary and permanent erosion control measures are adequately installed to control water runoff prior to, during, and after land clearing or disturbance activities.

### POLICY ENV-8.2

Discourage land development proposed on slopes over 15 percent. Consider development on slopes between 15 to 40 percent provided that specific site engineering can demonstrate that subsequent development is safe and will not adversely affect drainage courses, vegetation, or slope stability. Prohibit development on slopes 40 percent or greater, and establish minimum setbacks to protect slope stability.

### POLICY ENV-8.3

Require all construction activities to initiate and follow “Best Management Practices” to reduce dust and suspended particulates during the construction process and to facilitate construction related dust and dirt remains on-site during construction.

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## **POLICY ENV-8.4**

Reduce building energy use through green building practices and retrofit of existing buildings, and prioritize the use of lower-carbon building materials in new construction and building retrofits to reduce embodied carbon.

## GOAL ENV-9

Ensure that excessive noise and light pollution does not impair permitted land use activities in residential, commercial, and industrial zoning districts and consider potential impacts that may overburden vulnerable populations.



### POLICY ENV-9.1

Consider implementing reasonable and effective noise mitigation measures for arterial street improvements if the existing or projected noise levels exceed adopted City standards.

### POLICY ENV-9.2

Work with state and county agencies to mitigate highway and arterial noise and air quality concerns, while also addressing aesthetic concerns.

### POLICY ENV-9.3

Evaluate the benefit of measures designed to mitigate arterial street noise (such as noise walls and berms) and address impacts on the pedestrian environment and character of the neighborhood.

### POLICY ENV-9.4

Evaluate noise impacts when reviewing measures designed to keep traffic volumes and speeds within legal limits on collectors and arterials.

### POLICY ENV-9.5

Require new residential development to include traffic noise abatement design and materials where necessary to minimize noise impacts from arterials.

### POLICY ENV-9.6

Ensure that required planting buffers along streets in residential neighborhoods take noise levels of adjacent streets into consideration. Where noise levels exceed City standards, ensure that landscaping includes berms and vegetation that attenuate noise impacts.

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# ENVIRONMENT SUPPORTING ANALYSIS

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## Background

There are several regulations, policies, and agreements that dictate the development of the Environment element and require Mill Creek to protect natural resources and wildlife habitat which have a significant impact on Mill Creek's residents, employees, visitors, wildlife, and the greater Puget Sound region. The 2024 Vision Survey found that 72 percent of respondents noted that an aesthetically pleasing environment is an attribute that contributes to the quality of life in Mill Creek. Similarly, 51 percent of respondents noted that sustainability and respect for nature also enhance the quality of life in Mill Creek.

## Consistency with Plans and Policies

### FEDERAL PLANNING

The Endangered Species Act (ESA) establishes protections for fish, wildlife, and plants and that are listed as threatened or endangered and their habitat. A species may be listed as threatened or endangered under the ESA because of any of the following five factors:

- » Present or threatened destruction, modification, or curtailment of its habitat or range;
- » Over-utilization of the species for commercial, recreational, scientific, or educational purposes;
- » Disease or predation;
- » Inadequacy of existing regulatory mechanisms;
- » Other natural or manmade factors affecting its continued existence.

The Puget Sound Chinook Salmon, Puget Sound Steelhead, and Bull Trout were listed as threatened in 1999, 2007, and 1998, respectively. In 2005, the Southern Resident Orcas were designated as endangered. Additional information about threatened and endangered species in and around Mill Creek can be found in the Fish and Wildlife section below.

The Clean Water Act (CWA) was established to address water pollution. The CWA directs the State of Washington to establish surface water quality standards, identify impaired waterbodies, execute procedures to restore impaired waterbodies, and establish the National Pollutant Discharge Elimination System (NPDES).

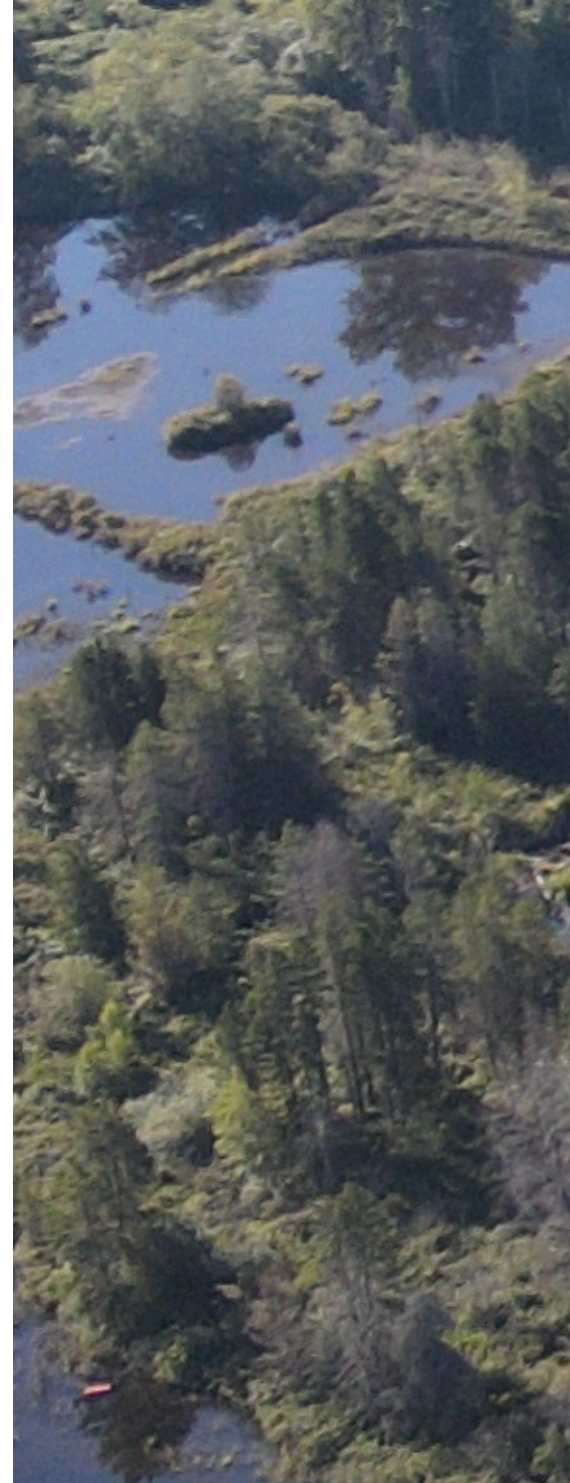


## State Planning

The Growth Management Act (GMA) requires Mill Creek to adopt critical areas regulations and requires the City to use best available science to designate and protect the functions and values of critical areas with development regulations. The GMA defines critical areas as **“(a) Wetlands; (b) areas with a critical recharging effect on aquifers used for potable water; (c) fish and wildlife habitat conservation areas; (d) frequently flooded areas; and (e) geologically hazardous areas.”** Mill Creek’s critical areas ordinance can be found in Chapter 18.06 of the Mill Creek Municipal Code (MCMC) and is described in detail in subsequent sections.

The GMA was amended by House Bill 1181 in 2023 with the goal to improve the State’s response to climate change by incorporating climate change into local comprehensive plans. This legislation requires Mill Creek to develop a new Climate Change and Resiliency Element, including greenhouse gas emissions reduction and resiliency subelements, by 2029. The City must also update the Transportation Element by 2029.

Mill Creek operates under a Phase II National Pollutant Discharge Elimination System (NPDES) Permit. The NPDES permit addresses several government functions that improve water quality, reduce flooding, preserve infrastructure, and educate the public. The permit calls for the City to manage stormwater through regulations and policies, inspection and enforcement, stormwater planning, illicit discharge detection and elimination, mapping, operations and maintenance, and public education and involvement, among other approaches. An anticipated addition to the NPDES permit will require the City to establish tree canopy goals as a stormwater management tool.





## Regional and Countywide Planning

According to Puget Sound Regional Council's VISION 2050, the health of communities and the economy is connected to the health of the environment. VISION 2050 multicounty planning policies (MPPs) and Snohomish County countywide planning policies (CPPs) support protecting and restoring natural systems, habitat, water quality, and air quality; encouraging restoration of shorelines to a natural condition for ecological function and value; reducing greenhouse gas emissions that contribute to climate change; and preparing for climate change impacts. The goals and policies in this Environment element are aligned with VISION 2050 MPPs and Snohomish County CPPs.

### Inventory of Environmentally Critical Areas

This section identifies environmentally critical areas and provides a description of existing conditions. This inventory includes a critical area map containing streams and wetland delineations prepared in conjunction with private development proposals, National Wetland Inventory maps, the Snohomish County Stream and Wetlands Survey (August 1986), the Natural Resources Conservation Service Soil Survey of Snohomish County (July 1983), and the Flood Insurance Rate Maps generated by the Federal Emergency Management Agency (November 1999). In conjunction with the 2004 Comprehensive Plan update, the City's wetland consultant verified the wetland boundaries established in Snohomish County's wetland survey.

Environmentally critical areas are displayed on the Critical Areas Map. These maps are intended to show the general location of known environmentally critical areas; site-specific identification and delineation is required at the time of a project proposal.

City of Mill Creek does not contain any shorelines of the state as defined by RCW 90.58.030, and is not required to adopt a Shoreline Management Plan.

## Water Resources

### WETLANDS

Wetlands are fragile ecosystems that assist in the reduction of erosion, siltation, flooding, and ground and surface water pollution. Wetlands also provide an important habitat for wildlife, plants, and fish. Numerous wetlands have been identified in Mill Creek and the MUGA – some on a very general basis from aerial mapping, some are shown by the soil survey of Snohomish County, and others have been precisely mapped where development has occurred. Generally, as properties develop the wetlands are more accurately delineated and mapped.

Some of these large wetland systems include those associated with the riparian habitats of North Creek, Penny Creek, Tambark Creek, and Nickel Creek. Of these systems, the North Creek wetlands are the most extensive, running from the northern city limits to the southern city limits and beyond. In places, the wetlands are several hundred feet in width and dominated by forested vegetation.

Other wetlands include those associated with Sitka Creek and Mill Creek, and numerous depressional and slope wetlands of varying size are also situated throughout the city. The peat substrate, bog-like wetland systems in the vicinity of Thomas Lake along 35th Avenue SE are fairly unique; relatively few such wetlands occur in Snohomish County.

Review for potential impacts to wetlands is performed at the time of development permit application review through the State Environmental Policy Act (SEPA) process. Additionally, the City's Critical Areas Ordinance designates protection measures for wetlands and their buffers (Chapter 18.06 of the MCM).

Wetlands in the city are protected because they are part of an important natural biological, flood prevention, and water provision system that should not be irreversibly altered. Further, the wet soil severely limits structural stability of development. Because of the specificity used in defining wetlands, and the quality of available maps, site-specific evaluations performed at the time of project application are necessary for the evaluation of specific parcels, per the City's Critical Areas Regulations.

The 2003 Wetland Assessment indicates varying conditions of wetlands within Mill Creek, and while some wetlands were found to be in good condition, others were found to be significantly degraded. The reasons for these varying conditions ranged from past agricultural activities (including grazing) to fragmentation, increased surface water runoff resulting from urban development, and the attendant loss of natural vegetation.

Beaver activity has contributed to water storage in wetland areas.

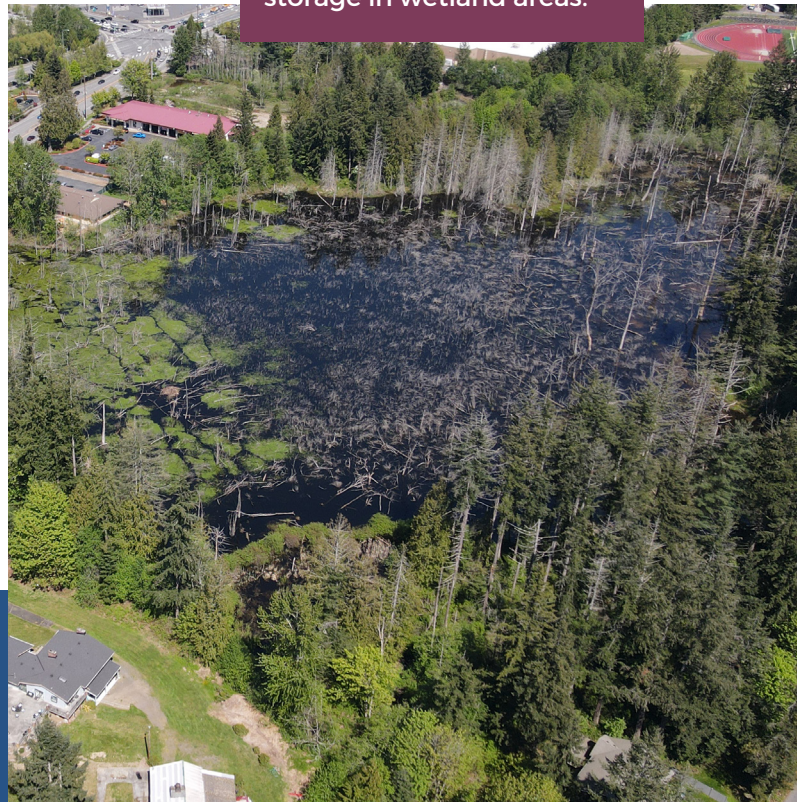
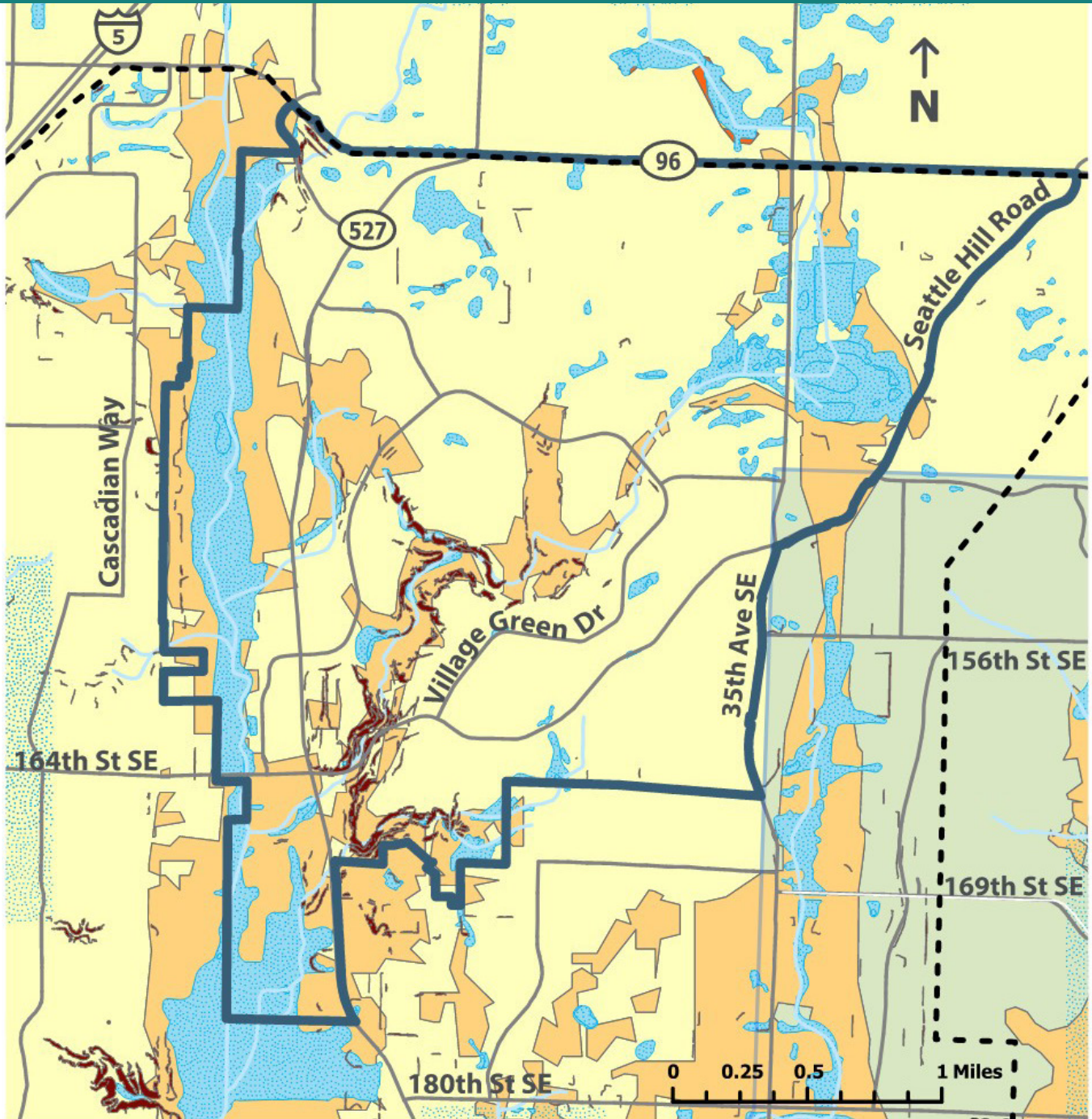


FIGURE 01. Critical Areas



Steep Slopes (>40%)

Streams

Wetlands

Cross Valley Sole Source Aquifer

Aquifer Sensitivity

Low (Over 100ft)

Moderate (40-100ft)

High (0-40ft)

Mill Creek City Limits

Mill Creek Municipal Urban Growth Area (MUGA)



## STREAMS AND DRAINAGE WAYS

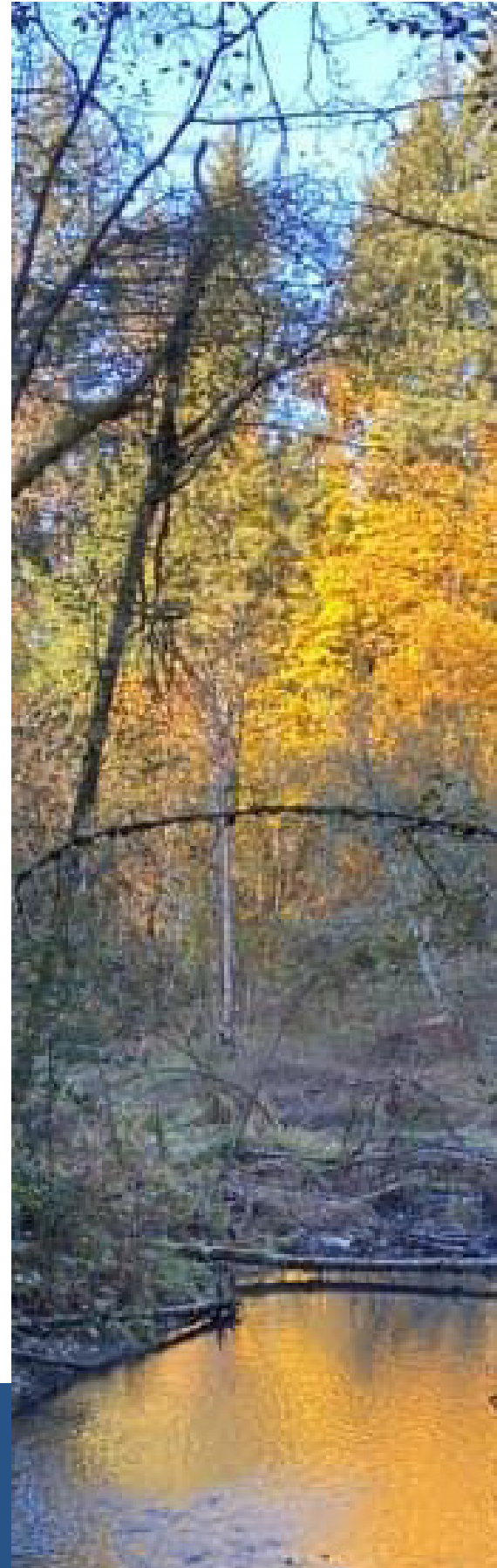
The City of Mill Creek lies within the Sammamish River watershed, which is comprised predominantly of the North Creek basin and a small portion of the Little Bear Creek basin. There are nine primary basins that make up the drainage area of Mill Creek and its MUGA including Murphys, Osborn, Upper Penny Creek, Mill Creek, Nickle Creek, Tambark Creek, Mill Park, and Mays. A small portion of the Little Bear Creek sub-basin is located within the eastern portion of the MUGA.

### North Creek

Of the six streams within the city, North Creek is the largest with respect to volume and channel width. Originating in Everett, North Creek runs the full extent of the city from the north end to the south end, and then flowing south until it merges with the Sammamish River in the City of Bothell. North Creek contains steelhead and provides spawning and rearing habitat for Chinook salmon, both of which have been identified as threatened species under the Federal Endangered Species Act. Other salmon species such as Coho salmon and Sockeye salmon also occur in North Creek. Together with its associated wetlands, North Creek comprises a significant riparian system of both local and regional importance. As development has occurred along the North Creek corridor, conservation easements have been granted to the City to permanently protect this valuable resource.

### Penny Creek

Penny Creek originates outside the city, flowing from the north to Thomas Lake, and then running in a westerly direction through the golf course and underneath SR 527, before merging with North Creek. Many of the upper reaches of Penny Creek are absent of riparian vegetation as a result of past development activity. Like North Creek, Penny Creek supports salmonid species including Coho salmon, steelhead and Sockeye salmon. The City of Mill Creek separates this area into two sub-basins based on how the stormwater system is designed regarding outfall points that are separated via piping, sheet flow, and infiltration areas. The two sub-basins are Upper Penny Creek and Lower Penny Creek.



## Nickel Creek

Nickel Creek is a salmon-bearing stream that originates within the City of Mill Creek in the vicinity of the Chatham Park development. Nickel Creek is tributary to North Creek, and has undisturbed riparian vegetation along the majority of the creek.

## Mill Creek

Mill Creek is a minor tributary of North Creek and originates east of SR 527. Mill Creek was informally referred to as Smokehouse Creek for a number of years, but in 2001 was officially named Mill Creek by the State Board of Geographic Names. Coho salmon and associated breeding areas have been identified in Mill Creek by Washington State Department of Fish and Wildlife (WDFW).

The upper reaches of Mill Creek have been disturbed by past development activities, but the lower portion (beginning at the senior housing development located at 14905 Bothell-Everett Highway) is undisturbed.

## Sitka Creek

Sitka Creek is another minor tributary of North Creek, originating near the city's northern boundary near McCollum Park. The creek and its associated wetlands have experienced little pressure from development until recently, with the construction of several residential projects nearby. In an effort to preserve the pristine character of Sitka Creek, these developments have utilized stormwater facilities designed to minimize impacts upon the creek.

## Tambark Creek

Tambark Creek originates south of Thomas Lake and flows south, crossing under 180th Street SE, then flowing westward into Silver Creek.

## AQUIFER RECHARGE AREAS/ GROUNDWATER RESOURCES

Groundwater is derived from precipitation and surface water filtering through the ground to aquifers. The ground where this filtering process takes place is called an aquifer recharge area. The quality of recharge areas and surface waters needs to be protected to ensure the quality of the groundwater used in the immediate area, as well as the quality of water for users down gradient from the recharge zone. Groundwater pollution is very difficult, often impossible to clean. One of the functions of wetlands is to recharge aquifers and purify the water running through them. Aquifer recharge areas can be found in areas other than wetlands.

Groundwater also supports aquifers for domestic drinking supplies. The majority of Mill Creek is now supplied with water from a public water system, although a small number of residents rely on private wells for their supply of potable water.

Aquifer recharge areas function as large underground "reservoirs" of water that provide water to wells for domestic use. Snohomish County has identified certain aquifers as critical aquifers because they provide the primary source of drinking water for most of the County residents. Based upon an inventory conducted by Snohomish County, there are some low to moderate aquifer sensitivity areas present within the city limits.

## FREQUENTLY FLOODED AREAS

According to the 2019 Federal Emergency Management Agency (FEMA) Flood Hazard Data shown on Snohomish County's PDS map portal, North Creek has a flood hazard zone designation of Zone A: one percent Annual Chance of Flooding, no Base Flooding Elevation (BFE). The wetland system located adjacent to 35th Ave SE, south of 132nd also has a Zone A designation. This area experienced considerable roadway flooding over the years until 2018 when the sections between 141st and 144th were repaired.

## FISH AND WILDLIFE HABITAT CONSERVATION AREA

Fish and wildlife habitat conservation areas are lands identified for maintaining populations of species in appropriate habitats within their natural geographic network, so that the habitat available is sufficient to support viable populations long-term. Fish and wildlife habitat conservation areas include areas in which State and Federally designated threatened, endangered, and/or sensitive species have a primary association with. Priority species and habitats listed by the Washington State Department of Fish and Wildlife (WDFW) are also identified as fish and wildlife habitat conservation areas. Streams and their associated buffers are also considered fish and wildlife habitat conservation areas, even if priority species are not present.

Development within Mill Creek and surrounding areas has significantly reduced available habitat for fish and wildlife. The loss of forested areas that once dominated the landscape has resulted in the loss of habitat for birds and animals, and has accelerated the volume and rate at which runoff enters streams and rivers. This runoff transports pollutants and sediments into streams, which degrade stream conditions that support fish and other aquatic species. The loss of vegetation adjacent to streams increases in-stream temperatures and eliminates available woody debris, which are essential ingredients of a healthy stream system.

Because Mill Creek residents place a high value upon the natural environment, many areas have been preserved as the city has developed. Riparian corridors, such as the North Creek, Penny Creek, and Tambark Creek corridors, as well as the extensive network of open space throughout the city, provide excellent habitat and movement corridors for birds, fish, and mammals. Herons are



often seen flying along the North Creek Greenway, and red-tailed hawks and bald eagles can be seen soaring above the North Creek Park located just south of Mill Creek.

### PRIORITY HABITAT AND SPECIES

In Washington State, the concept of “Priority Habitat and Species” (PHS) is part of a conservation program managed by the Washington Department of Fish and Wildlife (WDFW). The PHS program focuses on identifying and protecting key habitats and species that are crucial for maintaining biodiversity and ecological health across the state. Table 1 shows listed species in Mill Creek.

TABLE 01.

### WDFW Priority Habitats and Species

SPECIES	PRIORITY AREA	SITE NAME	FEDERAL STATUS
<b>Coho</b>	Occurance	North Creek	Candidate
	Breeding Area	Penny Creek	
<b>Sockeye Salmon</b>	Breeding Area	North Creek	
<b>Fall Chinook</b>	Breeding Area	North Creek	N/A
<b>Resident Coastal</b>	Occurance/Migration	North Creek	N/A
<b>Cutthroat</b>		Sitka Creek	
<b>Sockeye</b>	Occurance	North Creek	Not Warranted
<b>Winter Steelhead</b>	Occurance/Migration	North Creek	N/A
<b>Steelhead</b>	Occurance	North Creek	Threatened
<b>Chinook</b>	Occurance	North Creek	Threatened

Source: Washington State Department of Fish and Wildlife, 2023



## Earth Resources

### GEOLOGIC HAZARD AREAS

The City has defined geologically hazardous areas as **'areas that may not be suited to development consistent with public health, safety or environmental standards, because of their susceptibility to erosion, sliding, earthquake, or other geological processes as designated by WA 365-190-080(4). Types of geologically hazardous areas include: erosion, landslide, and seismic hazards.'** These areas have been identified on the Critical Areas map and occur primarily north of Nickel Creek (south of Seattle Hill Road), on the west and south sides of Dumas Road and west of North Creek. According to the Snohomish County Soil Survey, these areas exhibit steep slopes and contain soil types that are prone to erosion or slippage.

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<sup>1</sup> MCMC 18.06.210

## Environmental Issues

### Stormwater Management

#### WATER QUALITY

Sedimentation in North Creek and its tributaries and associated wetlands results from stormwater run-off, inadequate erosion control measures, inappropriate grading practices and other non-point source discharges. Sediments have an adverse impact on water quality in the streams and may result in continued degradation of habitat for salmon and aquatic vegetation. Along with sediment, stormwater run-off carries other pollutants that have an adverse impact on water quality in wetlands and streams.

The amount of hard surface has increased with the continued development in the North Creek watershed. Paved surfaces, compacted soils, and other hard surfaces do not allow water to infiltrate, which interrupts the natural hydrologic cycle. Without proper stormwater mitigation measures, this leads to increased stream flows and possible flooding, scouring of stream channels, deposition of sediment and loss of aquatic habitat.

## REGIONAL ISSUES

Streams and wetlands do not recognize jurisdictional boundaries. Decreased water quality and increased volumes and frequencies of surface water can have significant and cumulative impacts on downstream water bodies. In particular, North Creek is tributary to the Sammamish River, which provides habitat for several species of salmon.

Mill Creek recognizes the importance of regional coordination in developing strategies to protect threatened and endangered species. To this end, the City is participating in Watershed Resource Inventory Area (WRIA 8) for the purpose of salmon recovery. The City and 28 other local jurisdictions are responsible for addressing long-term watershed planning and conservation for nearby watershed basins.

## GROUNDWATER PROTECTION

The area just north of the intersection of Seattle Hill Road and 35th Ave. SE, along with the majority of the southeastern MUGA are located within a Sole Source Aquifer for the Cross Valley Water District. Thus, land developments in this area should take measures to reduce hard surface areas. Stormwater systems for these developments should be designed to minimize impacts to groundwater resources serving the Cross Valley Water District.

## ENDANGERED SPECIES PROTECTION

Several species protected under the Endangered Species Act either occur or have breeding territory in Mill Creek limits. Specifically, **Chinook salmon, steelhead trout, and bull trout are listed as “threatened” under the Endangered Species Act.** Opportunities for restoration are largely driven by the availability of state or federal funds; however, if funds are not available to implement restoration projects, the City can focus on community-wide education and the ongoing preservation of remaining resources. The health of the salmon population is crucial for the survival of the Southern Resident orcas in Washington State. These orcas primarily feed on Chinook salmon, which is their preferred prey.

## EROSION CONTROL/VEGETATION/TREE CANOPY

Vegetated slopes left in their natural state are less susceptible to erosion than unvegetated slopes. These provide valuable wildlife habitat and act as buffers for an associated stream or wetland. Slopes over 15 percent grade may have severe limitations for development. Slopes over 40 percent grade are generally considered unsuitable for development. In addition to the temporary erosion control measures the City requires for developments, the preservation and installation of new trees and other vegetation aid in erosion control efforts. As more trees and vegetation are removed, the potential for run-off and erosion to streams and wetlands will increase. Maintaining and expanding the amount of tree cover within the city is of vital importance to creating an aesthetically pleasing image while also providing necessary habitat and coverage for wildlife. The loss of natural vegetation diminishes the wooded setting that characterizes Mill Creek’s high quality of life for residents.

## AIR QUALITY

Local air quality may deteriorate as population and urban development increase. Factors contributing to poor air quality include suspended particulates from wildland fires, fireplaces, construction activities, and exhaust fumes from traffic. Numerous ecological impacts can result for poor air quality including the degradation of human, animal, and environmental health. Human health risks from poor air quality range in severity from headaches and dizziness to cancer, respiratory disease, other serious illnesses, and even premature death. Potential ecological impacts include damage to trees and other types of vegetation. Quality of life concerns include degradation of visibility, and deposition of soot and other particulate matter on homes and other property. Suspended air pollutants gather in valleys and topographic depressions during certain times of the year causing an increase in carbon monoxide and particulate levels.

## NOISE

Noise pollution as defined by the World Health Organization is constant or repetitive noise above 65 decibels. Sources of noise pollution include traffic noise, overflying aircraft, construction sites, and night life activities. The health impacts associated with excessive noise pollution include stress related illnesses, high blood pressure, hearing loss, sleep disruption, and lost productivity. It is recommended to limit ambient noise levels below 65 decibels during the day and 30 decibels at night to promote a quiet and healthy city. Interstate 5, SR 527, and SR 96 all represent notable transportation corridors that generate high volumes of noise in or around Mill Creek.





# ECONOMIC VITALITY

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## Introduction

The Economic Vitality element aims to build a strong, diversified economy in Mill Creek that supports both businesses and workers. By maintaining a strong local economy, the City seeks to create a resilient tax base that can endure economic fluctuations. This involves developing a range of job opportunities and supporting local businesses to ensure a robust economic environment that contributes to the City's fiscal health.

This element is closely tied to the Housing and Land Use elements, as effective planning for housing and land use is essential for supporting economic goals. Proper housing strategies ensure that there is adequate, affordable housing for the workforce, reducing commute times and enhancing quality of life. Meanwhile, strategic land use planning balances residential and commercial areas, facilitating economic development, while preventing conflicts between different uses.

# ECONOMIC VITALITY GOALS AND POLICIES

## GOAL EV-1

Provide for continued economic growth and development in Mill Creek that nurtures the community's established identity and economic assets, while supporting regional growth and economic strategies.



### POLICY EV-1.1

Work cooperatively on economic issues with local businesses and industries, County and regional governments, Chamber of Commerce, workforce development, labor organizations, and regional partners such as the Economic Alliance of Snohomish County.

### POLICY EV-1.2

Regularly review code requirements and permitting and licensing timelines to ensure they are conducive to business while also serving the needs of the community and not reducing the City's adopted aesthetic, environmental, and land use standards.

### POLICY EV-1.3

Support existing and new businesses, mixed-use, employment, and housing opportunities in and near the subareas (Town Center, South Town Center, and East Gateway Urban Village) and other commercial hubs throughout the city to enhance economic vitality and increase sales tax revenues. More people living in and near these areas will help create stronger demand for businesses and services.

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## POLICY EV-1.4

Plan for commercial and business development opportunities in future annexation areas through coordination with Snohomish County on appropriate future land use designations and infrastructure investments.

Recent mixed-use development at The Farm in in East Gateway Urban Village



## GOAL EV-2

Support economic activities that provide a strong tax base, contribute revenues to the City, and provide diverse living-wage jobs and economic opportunities for all Mill Creek residents.



### **POLICY EV-2.1**

Develop an equitable tax structure to keep and attract businesses while maintaining the City's ability to provide a high level of service for commercial and business park uses.

### **POLICY EV-2.2**

Develop strategies to promote widely shared prosperity and diverse living-wage jobs for all Mill Creek residents.

### **POLICY EV-2.3**

Explore the potential to increase the Mill Creek minimum wage to encourage prosperity for residents and employees in the city.

### **POLICY EV-2.4**

Include economic vitality policies consistent with existing or planned capital facility and utility investments. Identify and implement strategies to ensure timely development of needed facilities.



## GOAL EV-3

Establish a connection between housing and economic development to increase quality of life and reduce traffic and commute times by improving jobs-housing balance, promoting affordable housing to workers employed in Mill Creek, and focusing on medium- and high-density housing development in designated subareas to create a “critical mass” to support commercial and retail services in those areas.



### POLICY EV-3.1

Through adopted development regulations and design standards, encourage a convenient and diverse set of retail businesses and amenities to serve the needs of residents of Mill Creek and the surrounding area, particularly in designated subareas.

### POLICY EV-3.2

Continue to support increasing the economic vitality of Mill Creek’s subareas, including Town Center, South Town Center, the East Gateway Urban Village, and other commercial hubs as places that will thrive and prosper and provide opportunities for the community to live, work, shop, dine, and gather.

### POLICY EV-3.3

Encourage pedestrian-oriented commercial uses through placemaking to provide opportunities for residents from Mill Creek and the surrounding area to shop and dine and to provide economic benefits to the City through sales tax generation.

## GOAL EV-4

Develop implementation programs that encourage economic growth and protect existing businesses, while attracting new businesses and industries, particularly key regional industry clusters and businesses providing goods and services for export.



### **POLICY EV-4.1**

Promote and market Mill Creek as a desirable location for key regional industries, including healthcare, technology, life sciences, and aerospace to diversify Mill Creek's economy and employment opportunities.

### **POLICY EV-4.2**

Dedicate City resources towards part-time or full-time Economic Development staff.

### **POLICY EV-4.3**

Sustain and enhance arts and cultural institutions to foster an active and vibrant community life.

### **POLICY EV-4.4**

Encourage capital improvement projects in commercial areas, designated subareas, and near high-capacity transit to improve pedestrian and vehicular circulation systems and stimulate more intensive and concentrated activity.

## GOAL EV-5

Encourage efforts to sustain and respect the natural environment in the city and surrounding areas through support of climate friendly, sustainable, and resilient businesses, business and industrial practices, and technologies.



### **POLICY EV-5.1**

Encourage business practices that minimize environmental impacts, such as the reduction of waste, and businesses that promote environmental sustainability, especially those addressing climate change and resilience.

### **POLICY EV-5.2**

Through infrastructure investments and development regulations, encourage commercial uses to be accessible for pedestrians, bicyclists, and transit users to help reduce greenhouse gas emissions and traffic.

## GOAL EV-6

Strive to sustain and increase economic opportunities for all Mill Creek residents by supporting small, women-owned, veteran-owned, and minority-owned businesses, job training and education programs, and consideration of displacement of existing businesses.



### POLICY EV-6.1

Foster a supportive regulatory environment, tools, and programs that support the establishment and growth of small and startup businesses in a variety of sectors, through funding, technical assistance, or small business tenancing in new development.

### POLICY EV-6.2

Identify potential physical, economic, and cultural displacement of existing locally owned, small businesses as a result of development or redevelopment or market pressure. Consider a range of strategies to mitigate the impacts of displacement to the extent feasible.

### POLICY EV-6.3

Continue to coordinate with school districts and education providers to support high-quality education and job training resources for all residents and to align land use and zoning with future demand for public school services as needed.

### POLICY EV-6.4

Support and recognize the contributions of the region's culturally and ethnically diverse communities and indigenous populations, including helping the region continue to expand its international economy.

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# ECONOMIC VITALITY SUPPORTING ANALYSIS

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## Coordination with Other Plans and Policies

### Growth Management Act

The Revised Code of Washinton (RCW) 36.70A.070 (7) requires Comprehensive Plans to include an economic vitality element establishing local goals, policies, objectives, and provisions for economic growth and vitality and a high quality of life.

#### REGIONAL PLANNING – VISION 2050

The Puget Sound Regional Council's Vision 2050 includes a Regional Economic Strategy, organized around three key goal areas – Expanding Economic Opportunity, Maintaining Global Competitiveness, and Sustaining Quality of Life. Within that framework, the Regional Economic Strategy includes the following focus areas:

- » Equity
- » Health
- » Childcare
- » Job Distribution
- » Broadband
- » Housing
- » Business Recovery
- » Industry Resilience

The Multicounty Planning Policies (MPPs) associated with Vision 2050 have a goal of supporting businesses and job creation, investing in all people and their health, sustaining environmental quality, and creating great central places, diverse communities, and high quality of life.

#### SNOHOMISH COUNTY COUNTYWIDE PLANNING POLICIES

Snohomish County's Countywide Planning Policies (CPPs) reflect the goals of the multicounty and PSRC visions, with an emphasis on three industry clusters as the focus of Snohomish County. These three industry clusters are Aerospace, Life Science (Biotech and Medical Devices), and Technology Manufacturing.

A key aspect to creating sustainable communities and improving the quality of life is creating more opportunities for residents of Snohomish County to work closer to home. The CPPs, as the framework for local comprehensive plans, support the integration of economic opportunities, transportation improvements, investments in education, protection of environmental quality, and focusing on growth in designated centers, consistent with the Regional Growth Strategy in VISION 2050.

## CITY OF MILL CREEK STRATEGIC PLAN

In parallel with the Comprehensive Plan process, the City of Mill Creek has developed a separate 2040 Vision. Four themes guide the articulation of the Strategic Priorities. Strategic Priorities are things the City Council has decided to be important moving forward. These Strategic Priorities are as follows, one of which relates to Economic Vitality and will be supported by this element:

- » Financial Health/Economic Vitality
- » Engaged, Connected Community
- » Safe and Clean
- » Well Maintained Outdoors

The Strategic Vision for financial health and economic vitality is summarized as follows:

- » Mill Creek has multiple commercial hubs with a vibrant central core, enabling businesses to thrive, creating a destination for dining and shopping and providing a stable economic base for City services.
- » Mill Creek proactively funds the services that meet community needs and priorities.
- » Mill Creek has enough money in reserves both to strategically invest in the City and to cover unanticipated operating expenses.

## Mill Creek Subareas

Mill Creek's subareas, including Town Center, South Town Center, and the East Gateway Urban Village are planned as places that will thrive and prosper and provide opportunities for the community to live, work, shop, dine, and gather now and into the future. For more about planning and key priorities in these areas, refer to the Land Use element of this Comprehensive Plan. The City is proposing to complete additional planning and to identify implementation strategies for South Town Center in the near term future.

Starbucks with iconic design elements in Town Center provides character and visual interest.



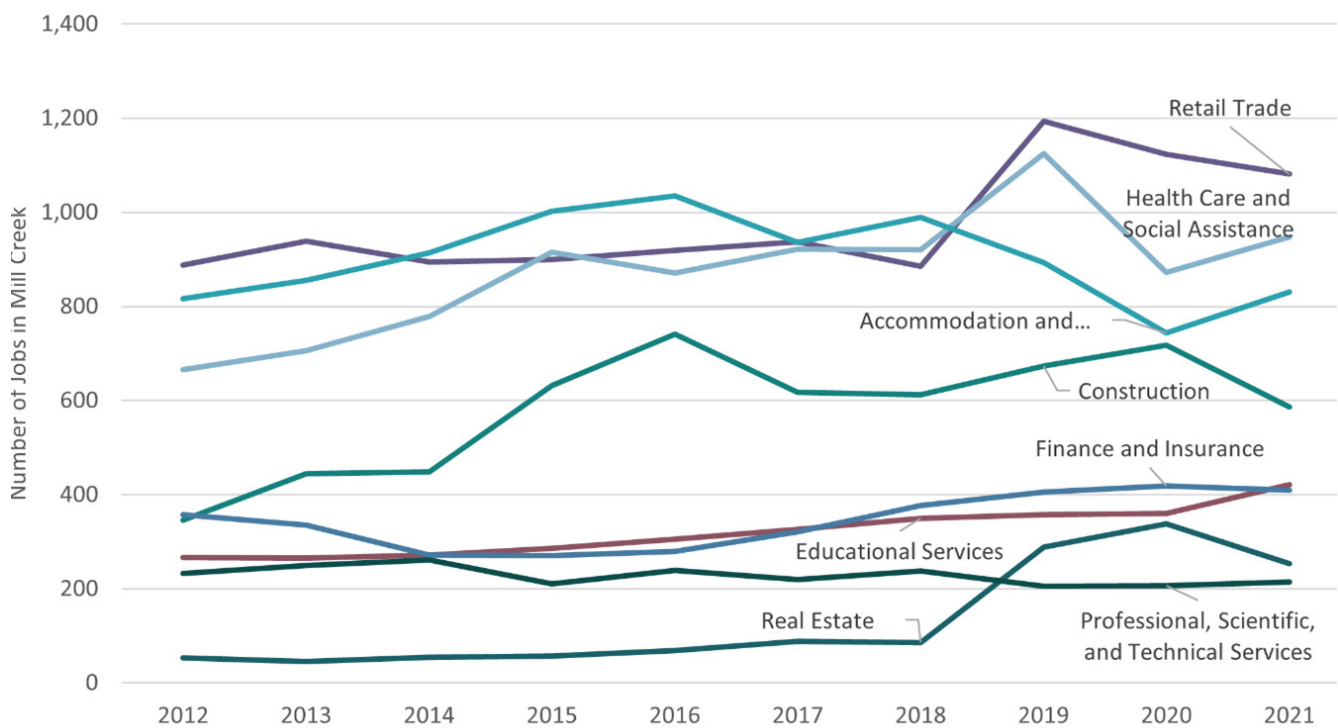
# Existing Conditions

## Employment Sectors

Mill Creek has a high share of jobs in **retail, food service, health care, and construction**, as shown below in Figure 1. Retail jobs in the city are still strong despite the pandemic slowdown in 2020, whereas construction has tapered off since 2020. Traditionally white-collar jobs such as professional services and finance have remained consistent for the past decade.

FIGURE 01.

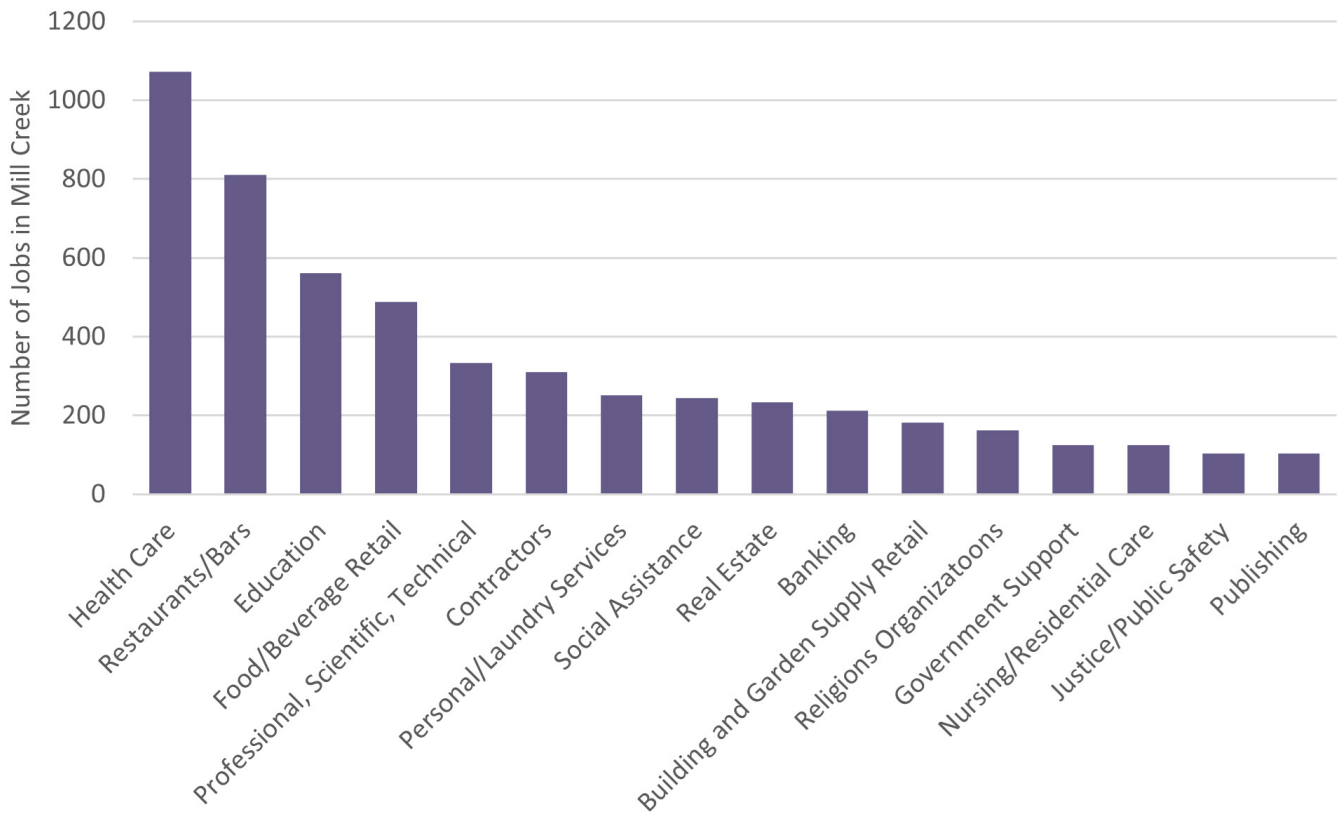
### Top Job Sectors in Mill Creek, 2012-2021



Source: U.S. Census Longitudinal Employer-Household Dynamics (LEHD), via Census OnTheMap

FIGURE 02.

## Detailed Job Sectors in Mill Creek with More than 100 Jobs, 2023



Source: Data Axle, via ESRI Business Analyst

When broken down by 3-digit NAICS (a more specific breakdown of industries), similar trends emerge with **health care, food service, and education** showing the most jobs in the city, as shown above in Figure 2. Although there are over 1,000 health care jobs, nearly all are in small businesses of 50 or fewer employees. Most food service jobs are also in small businesses, with the exception of chains such as McDonald’s and Starbucks. Top employers in the city include Lowe’s, the Town & County Market, the Everett School District, Safeway, McDonald’s, the City of Mill Creek, and Snohomish County.



## Jobs-Housing Balance

Encouraging employment growth in Mill Creek may contribute to, and help maintain, a “balanced” jobs-housing ratio. A balanced jobs-housing ratio (near 1.0) helps to ensure that workers have housing near their place of employment. An imbalance results in longer commute times, traffic congestion, and strain on physical and mental health.

Mill Creek’s Jobs-to-Housing Ratio is 0.75, indicative of a bedroom community but with a reasonable employment base. PSRC’s VISION 2050 contains regional goals towards an even balance to decrease traffic and emissions and provide housing affordable to employees in the city.

Another component of the jobs-housing balance is understanding Mill Creek’s local workforce, matched with housing affordability. It is not just about having enough housing, but it is important to know what kind of housing Mill Creek workers can afford. Mill Creek’s average rent (\$2,134) and median home sale price (\$935,000) is higher than surrounding cities of Everett (\$1,648 and \$573,800, respectively) and Lynnwood (\$1,611 and \$596,200 respectively). This can lead some of those employed in Mill Creek to live elsewhere.

TABLE 01.

### Peer Cities Comparison

	EMPLOYMENT (2019)	HOUSING UNITS (2020)	JOBS/HOUSING UNIT RATIO
<b>Lynnwood</b>	26,628	16,132	1.65
<b>Everett</b>	99,817	47,023	2.12
<b>Bothell</b>	16,100	7,343	2.19
<b>Mill Creek</b>	<b>6,787</b>	<b>8,961</b>	<b>0.75</b>
<b>Snohomish County</b>	295,816	317,348	0.93

Source: US Census ACS 2022 5-Year Estimates; PSRC Covered Employment Database

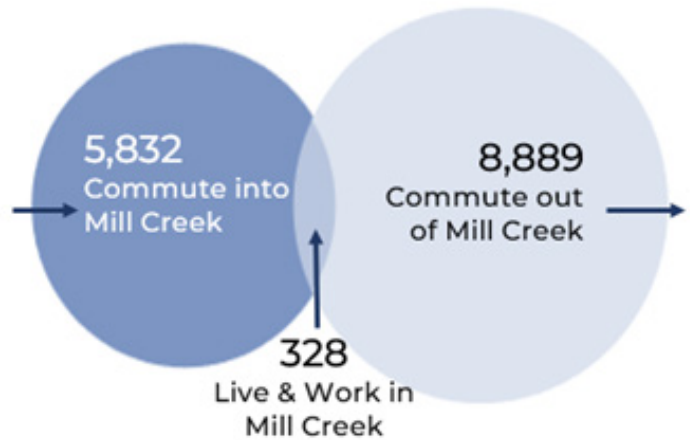
Related to the peer comparisons presented in Table 1 above: despite those cities being in close geographic proximity, the economic characteristics of the peer cities vary considerably. Mill Creek, when compared to nearby cities, has a significantly higher jobs to housing ratio.

## Commuting

Figure 3 shows commuting patterns in Mill Creek, which shows that **less than 5 percent of Mill Creek residents also work in the city**. Nearly a quarter of Mill Creek residents work in Seattle. The top cities where Mill Creek residents work are Seattle, Everett, Bothell, Bellevue, and Redmond. The top cities where Mill Creek employees live are Everett, Seattle, and unincorporated areas.

FIGURE 03.

## Commuting Patterns in Mill Creek, 2021



Source: U.S. Census Longitudinal Employer-Household Dynamics (LEHD), via Census OnTheMap

## Economic Vitality in a Suburban Context

Mill Creek is primarily a bedroom community, as shown by its relatively low jobs-to-housing ratio. In the context of the suburban greater Seattle metro area, major manufacturing or large-scale industries are less likely to occur in Mill Creek. Some specific considerations the city may consider in crafting a realistic strategy for Economic Vitality in a suburban context include:

- » Increasing **tax revenue** through encouraging sales tax-producing businesses.
- » Fostering **placemaking and amenities**, including building on the existing strengths of Mill Creek Town Center and planning for effective placemaking in the South Town Center Subarea.
- » Encouraging **small businesses and entrepreneurship**, potentially through partnerships with the Chamber of Commerce or other organizations.
- » Seeking to attract **medical and health care uses**, even at a small scale, since these are already a major sector in the city and are expected to continue to be important regional economic drivers in the coming decades.

# Growth Targets

## Land Capacity for Accommodating Growth Targets

The Snohomish County Countywide Planning Policies (CPPs), adopted to implement the Growth Management Act (GMA), establish employment growth targets for each of the jurisdictions within the county. The employment target is the amount of job growth Mill Creek should plan to accommodate during the 2024-2044 planning period.

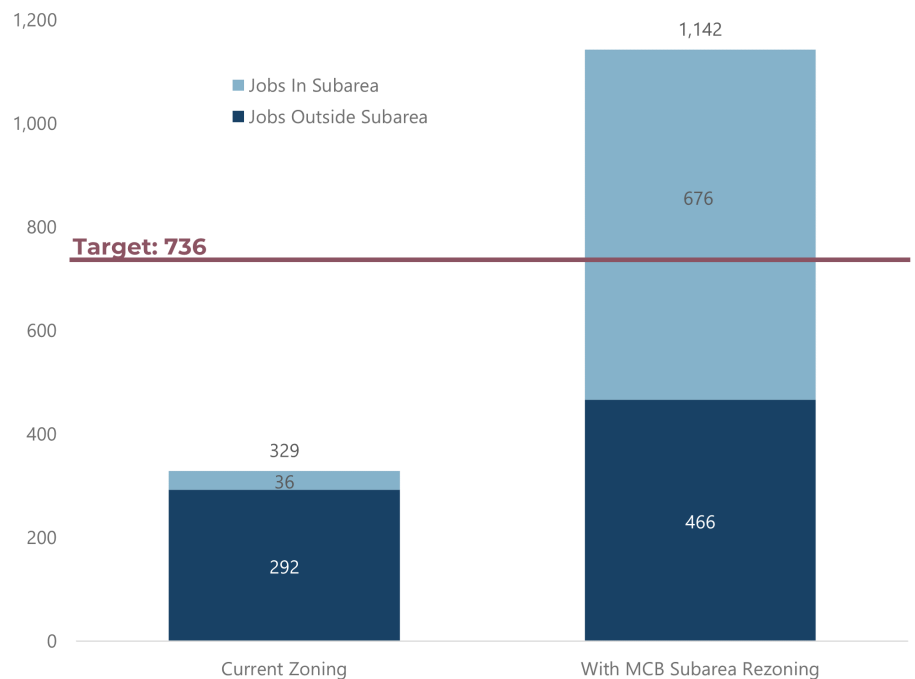
**Mill Creek must plan for an additional 736 new jobs by 2044**, as set forth in the Snohomish County Countywide Planning Policies. The city is required to show land capacity for these new jobs. Under current zoning, Mill Creek does not have sufficient capacity for the level of commercial development needed to achieve these targets.

In efforts to address this shortfall, the city plans to rezone South Town Center to allow more intensive multifamily, mixed-use, and commercial development, as part of this Comprehensive Plan update. A forecasted land capacity analysis incorporating this change assumed redevelopment of South Town Center at an approximate density of 100 units per acre and 20 jobs per acre.

**With the proposed rezoning in the Subarea, there will be sufficient land capacity to meet the City's target of 736 new jobs.** A full discussion of the methodology and results of this analysis can be found in the "Land Capacity Analysis Methodology and Results" in the Appendix.

FIGURE 04.

### Land Capacity for New Jobs with Targets, with and without South Town Center Subarea Rezone, 2020-2044



Source: Snohomish County, City of Mill Creek, CoStar, Urban Footprint, Leland Consulting Group

An aerial photograph of a park. In the upper right, there is a large, circular playground with a red rubber safety mat and various play structures. To its left is a rectangular basketball court with a grey surface. Further left is a tennis court with a green surface. The park is surrounded by dense green trees and a paved path. Two people are visible on the basketball court. The text 'PARKS, RECREATION, AND OPEN SPACE' is overlaid in white on a dark blue background at the bottom of the image.

# PARKS, RECREATION, AND OPEN SPACE

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# Introduction

Parks and recreational facilities play a crucial role in enhancing the quality of life in Mill Creek. These areas, often seen as complementary to residential, commercial, and office development, are generally publicly owned and managed for the benefit of the entire community.

The Parks, Recreation, and Open Space Element establishes goals and policies to guide the acquisition, development, and implementation of the City's parks, recreation, and open space system. This element is crafted to meet the Comprehensive Plan criteria set by the Washington State Recreation and Conservation Office, ensuring eligibility for grants provided by the agency.

In accordance with the Washington State Growth Management Act (GMA), this element has been developed in alignment with other plan components. Specifically, the proposed park facilities and the Level of Service (LOS) standards outlined in this element are consistent with the Land Use and Capital Facilities elements. The GMA also mandates that jurisdictions identify lands suitable for public use. This element designates the general locations of properties potentially suitable for public parks and open spaces on the Parks and Open Space Map. These facilities are also marked on the Land Use Element map and discussed in the Capital Facilities Plan Element.

This element contains a list of existing and proposed facilities, implementation strategies, and the Parks, Recreation, and Open Space map.

Information contained in the goals and policies provide the basis for the development of the park, recreation, and open space LOS Standards and Facility Guidelines, as well as the proposed facilities illustrated on the Parks and Open Space Map.

The City does not have a distinct Parks Department, and has not had a Parks, Recreation, and Open Space (PROS) Plan in the past. To date, the City has used the Comprehensive Plan for overarching goals and policies, worked with developers on providing neighborhood parks, trails, and open spaces as mitigation for residential development, and performed public engagement and planning efforts driven by specific City park and open space projects. As part of the 2025-2030 Capital improvement Plan, the City will be developing a city-wide Parks, Recreation, and Open Space (PROS) Plan in 2025, focused on identifying strategic action initiatives and goals the City has for the next 6 to 20 years as they relate to public parks within the City. Development of this plan will include engagement with the City Parks and Recreation Board and the public. The PROS Plan will be used to address goals and policies in this element, and to prioritize projects within the Capital Improvement Plan.

# PARKS, RECREATION, AND OPEN SPACE GOALS AND POLICIES

## GOAL P-1

Provide an equitable, high-quality parks and recreation system that offers a variety of amenities and is welcoming to people of all ages, abilities, incomes, and participation levels.



### POLICY P-1.1

Focus park, recreation, and open space improvements and expansions in areas of high need and in areas that have been historically underserved.

### POLICY P-1.2

Expand a City-provided recreation program to serve all age groups, physical and mental abilities, cultures, and interests.

### POLICY P-1.3

Park and facility designs shall meet the requirements of the Americans with Disabilities Act (ADA).

### POLICY P-1.4

Enhance the quality of life in Mill Creek with a broad range of parks and recreation courses supported by residents.

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### **POLICY P-1.5**

Encourage safety and security as prime considerations in the design and development of park and recreation facilities and features, and implement designs that are consistent with Crime Prevention through Environmental Design (CPTED) best practices.

### **POLICY P-1.6**

Require durable park and recreation features and fixtures that are able to withstand wear while remaining safe and functional.

### **POLICY P-1.7**

Appropriately locate trees and landscaping to enhance and avoid barriers to natural surveillance of park and recreation areas.

### **POLICY P-1.8**

Complete a Parks, Recreation, and Open Space Plan to evaluate how best to serve the needs of the community as it changes. The plan should evaluate opportunities to meet the City's Level of Service (LOS) Standards and Facility Guidelines (described in the Supporting Analysis section of this element) or alternative standards based on analysis to provide a variety of indoor and outdoor recreation opportunities, including but not limited to: active recreation facilities such as youth softball/baseball fields, full size soccer fields, tennis courts, volleyball courts, a multiple-use recreation and multigenerational community center, gym facilities, bicycle trails, and jogging or fitness trails.

## GOAL P-2

Create unique and vibrant recreation experiences for Mill Creek residents and visitors.



### POLICY P-2.1

Strengthen volunteerism with an outreach program to encourage and incentivize community participation.

### POLICY P-2.2

Maintain a list of public and private recreational facilities and programs in Mill Creek (including publicly and privately managed facilities), neighboring jurisdictions, and Snohomish County.

### POLICY P-2.3

Conduct program evaluations, surveys, and community engagement to understand and support meeting community needs.

### POLICY P-2.4

Install gateway and wayfinding signage, features, and fixtures to create a welcoming identity for Mill Creek's park facilities.

### POLICY P-2.5

Create a vibrant cultural arts environment that builds community identity and promotes public participation in the arts, strengthens cultural and economic vitality, contributes to the quality of life of residents, and activates the public realm with signature art and cultural festivals and events.

### POLICY P-2.6

Encourage development of outdoor plazas and squares within public and private developments for community events, visual and performance based public art opportunities, and to encourage community connections.



## GOAL P-3

Ensure a variety of park types and sizes that are easily accessible by varied transportation modes and well-distributed throughout the city.



### POLICY P-3.1

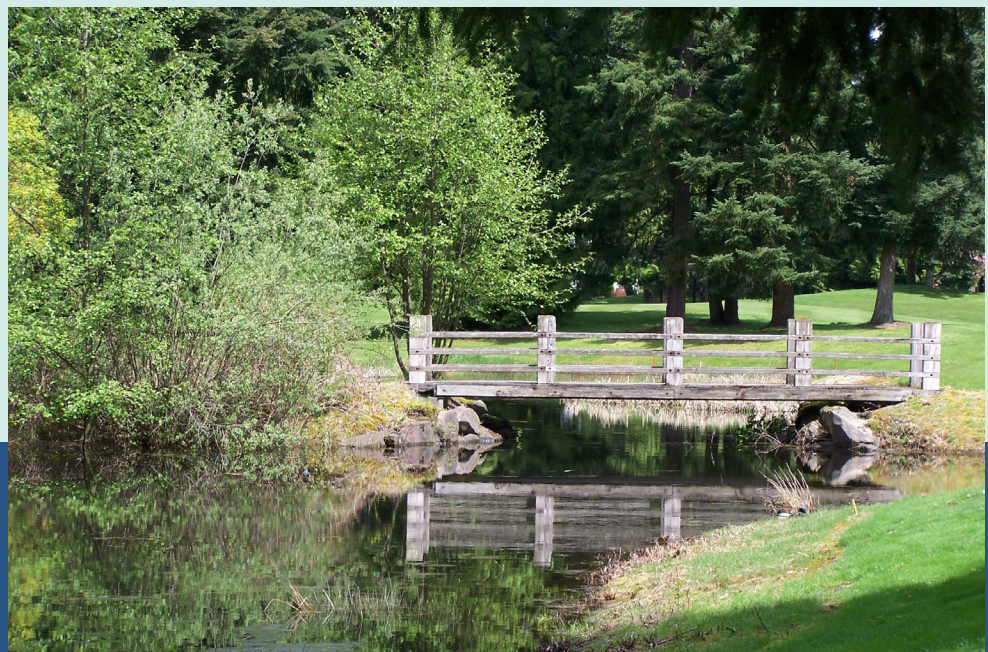
Incorporate adequate on-site and off-site parking for vehicles and bicycles at parks and recreation areas, and enhance access to transit where applicable. Incorporate public restrooms at parks and recreation area.

### POLICY P-3.2

When considering the acquisition of park land, make infrastructure improvements to increase connectivity to and from parks, recreation areas, open spaces, and trails.

### POLICY P-3.3

Invest in multi-modal infrastructure improvements to promote park access for bicyclists and pedestrians, promote healthy lifestyles, reduce overall traffic volumes and limit the need to devote scarce recreational resources to parking.



## GOAL P-4

Pursue public lands to meet the recreational needs of the community to provide high quality and convenient parks and recreation facilities for both active and passive recreation activities for Mill Creek's current and future populations.



### POLICY P-4.1

Identify additional opportunities to increase the use of parks and school district properties for recreation use and programming by the City of Mill Creek.

### POLICY P-4.2

Secure public access to facilities owned by other public jurisdictions or agencies in order to meet community park needs.

### POLICY P-4.3

Engage the Parks and Recreation, Art and Beautification, and Design Review Boards when reviewing proposed improvements to the park system.

### POLICY P-4.4

Maintain a relationship with Washington State, Snohomish County, neighboring jurisdictions, and school districts to facilitate and support a coordinated effort in managing parks, recreation facilities, and other shared resources.

### POLICY P-4.5

Ensure proper coordination with Snohomish County, the City of Everett, and the City of Bothell regarding McCollum Park, North Creek Park, and other key regional recreation facilities.

### POLICY P-4.6

Cooperate with federal, state, and local agencies and private organizations in development of the local and regional trail system.

## GOAL P-5

Leverage the parks and open space system to emphasize and protect the environmental qualities and natural amenities within the city and municipal urban growth area.



### POLICY P-5.1

Use greenbelts and open space areas to emphasize the entryways and edges of the city, enhance property values and tax bases, and strengthen the identity of Mill Creek by prioritizing its natural resources.

### POLICY P-5.2

Encourage the preservation of Mill Creek's natural resource areas and open spaces.

### POLICY P-5.3

Allow public use of natural resource areas where site conditions allow.

### POLICY P-5.4

Use open space areas to protect sensitive areas such as unstable slopes or wetlands, enhance water quality, preserve wildlife habitat or migration routes, provide visual relief, enhance the streetscape, and reduce noise levels.

### POLICY P-5.5

Promote increased public awareness of the value of natural resource areas and open spaces by incorporating education features in parks.

### POLICY P-5.6

Encourage the retention of natural vegetation around park perimeters to define park boundaries, provide visual relief, reduce noise and visual intrusion, and buffer recreation activities from incompatible uses.

## GOAL P-6

Periodically evaluate the City's Level of Service (LOS) Standards and Facility Guidelines for parks and recreation facilities to ensure that they continue to reflect the community's needs and the City's ability to provide and maintain such facilities.



### POLICY P-6.1

Utilize the Level of Service (LOS) Standards and Facility Guidelines when planning, and acquiring funding for, the expansion and enhancement of Mill Creek's park and recreation system. Update the standards as needed as part of development of a communitywide parks, recreation, and open space plan.



## GOAL P-7

Consider all available financing mechanisms and grants for funding the parks and recreation program's upkeep and growth.



### POLICY P-7.1

Site, design, and develop park and recreation facilities with consideration given to the long-term maintenance, operation, and renovation or replacement costs.

### POLICY P-7.2

Develop long-term financing strategies that address the funding needs for future capital projects, public art, and maintenance and operation of existing facilities.

### POLICY P-7.3

Require developers to offset the impact of proposed development on the City's parks and recreation system.

### POLICY P-7.4

Require developers to contribute to the open space and recreational facilities system, including the provision of neighborhood parks and mini-parks that support the active and/or passive recreation needs of the community.

### POLICY P-7.5

Use community park mitigation fees to finance facilities that are owned by other jurisdictions or agencies, but that are used by the City to meet community park needs.

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# PARKS, RECREATION, AND OPEN SPACE SUPPORTING ANALYSIS

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## Facilities Description

To guide the designation of parks and open space facilities, the following facility descriptions are used. The descriptions are intended to be general in their application but should be considered by the City and private development community in siting and designing park and open space uses.



### 1. REGIONAL PARKS:

Regional park facilities should contain both active and passive uses and siting requirements similar to those established for community parks. Because of the large size, cost, and service area of regional parks, multi-jurisdictional cooperation is often necessary for acquiring, developing, and maintaining a regional park facility. In addition, opportunities exist for including additional public facilities such as schools, transit facilities, a performing arts center, a community center, regional drainage facilities, wildlife preserves, and other uses considered compatible with the general scope or theme of a regional park.

FIGURE 01. Parks and Trails Map



- |   |  |
|---|--|
| 1 <b>Buffalo Park</b> 13401 44th Ave. SE            | 7 <b>Library Park</b> 15429 Bothell-Everett Hwy          |
| 2 <b>Cougar Park</b> 3221 148th St. SE              | 8 <b>Mill Creek Sports Park</b> 13903 North Creek Dr.    |
| 3 <b>Exploration Park</b> 13901 North Pointe Circle | 9 <b>Nickel Creek Park</b> 1900 164th St. SE             |
| 4 <b>Heron Park</b> 2701 155th St. SE               | 10 <b>North Creek Trail</b> Entrances off of Main Street |
| 5 <b>Highlands Park</b> 16123 Highlands Blvd. SE    | 11 <b>Pine Meadow Park</b> 15803 32nd Ave. SE            |
| 6 <b>Hillside Park</b> 14721 12th Ave. SE           | 12 <b>Silver Crest Park</b> 13621 28th Dr. SE            |

Note: Various other private parks and open spaces exist throughout Mill Creek, but these are not typically open to public use.



## 2. COMMUNITY PARKS:

Community parks should provide opportunities for active and passive recreation facilities and are typically large enough to provide room for organized sports such as soccer and baseball fields, a recreation center, basketball and tennis courts, a trail system, swimming pool, and/or a group-use shelter.

Community parks should be within close proximity of the community served and be located on collector or arterial streets that provide easy vehicular access to the residents of the community. Since community parks may be surrounded in part by residential development, active organized sports should be planned in areas and/or in a manner that will not detrimentally impact surrounding residences. Community park needs can also be served by facilities owned by other public agencies, such as a school district, as long as the public has the right to utilize the facilities. Adequate provision for parking is required since many people would travel to the park by automobile.

Like regional parks, the relatively large size, high cost, and extended service area of a community park often require multi-jurisdictional cooperation for the acquisition, development, and maintenance of a community park facility.



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### **3. NEIGHBORHOOD PARKS**

Recreational activities related to neighborhood parks include passive and active uses, as well as multi-purpose facilities designed to serve the needs of the adjacent neighborhood. Active uses can usually include organized and non-organized sports facilities (i.e., basketball, tennis and play equipment) and should be conducted in such a manner as to be compatible to the surrounding residential areas. Passive uses include public gathering areas, public plazas, open play areas, nature trails and picnic areas. Restroom facilities should be provided in neighborhood parks.

Neighborhood parks should emphasize convenient and safe access by pedestrians and bicyclists. Adequate space for open play fields and play equipment should be emphasized, and on street parking areas should be limited in size. During peak use times, on-street parking is necessary to serve the needs of park users that drive to the park.

### **4. OPEN SPACES - GREENWAY AREAS**

Public/private open spaces and greenway areas including streams and wetland buffers, natural vegetation areas and large open spaces can be utilized for passive recreation purposes and pedestrian (hiker/ biker) linkages. Open spaces and greenways can also be used to buffer potentially incompatible land uses.

### **5. PRIVATE “MINI PARKS” AND OPEN SPACE**

Private open spaces would include the golf course, nature preserve, tot lots, and mini-parks. Tot lots should be located within easy accessibility to surrounding neighborhood residences or within commercial centers. Passive open spaces such as natural preserves and greenbelts should be planned in areas to separate incompatibilities and provide for pedestrian and wildlife corridors.

### **6. PEDESTRIAN FACILITIES**

Pedestrian facilities provide linkages between neighborhoods, parks, schools, transit facilities and commercial areas. Within the context of this element, pedestrian facilities include both multi-use facilities such as the North Creek Trail, used by pedestrians and cyclists, and on-street sidewalks. Future pedestrian facilities, whether constructed by the City or private developer, should provide connections to the existing public pedestrian facilities system and/or activity areas such as parks, schools, transit, and shopping. Pedestrian facilities are sometimes located on private property with easements granted to the public to allow access.

# Level of Service Standards and Level of Service Guidelines

The LOS standards are intended to reflect the recreation facilities required to serve the anticipated population of Mill Creek and immediate surroundings, as well as the City’s ability to provide those facilities. The parks, recreation, and open space needs have been separated into two categories, “Level of Service (LOS) Standards” and “Level of Service Guidelines.” The City has established Level of Service Standards for Neighborhood Park facilities, which are also described in the Capital Facilities element. Community Park and Regional Park facilities have Level of Service Guidelines.

## Level of Service Standards

Level of Service Standards are mandatory requirements of the Growth Management Act. It prevents jurisdictions from approving new developments if they would reduce the Level of Service of a capital facility below its minimum standard, unless the necessary improvements or strategies are implemented concurrently with the development. The GMA defines “concurrent with development” as having either the required improvements in place at the time of development, or a financial commitment to complete these improvements or strategies within six years.

The City updates and adopts a six-year Capital Improvement Plan (CIP) every two years, prior to the biennial budget. This plan identifies specific capital projects in the categories of Parks, Transportation, Stormwater, and City Facilities to be constructed over a six-year planning period. The CIP designates specific funding sources, including park and traffic impact mitigation fees, and is adopted as part of the Capital Facilities Plan Element by reference. The Parks, Recreation, and Open Space element is thereby consistent with the Capital Facilities element.

TABLE 01.

## Level of Service Standards for Neighborhood Parks

	2024 CITY POPULATION: 21,630			2044 PROJECTED CITY POPULATION: 24,813	
	EXISTING FACILITIES (ACRES)	FACILITIES NEEDED (ACRES)	SURPLUS / (DEFICIT)	FACILITIES NEEDED (ACRES)	SURPLUS / (DEFICIT)
<b>Neighborhood Parks</b>	43	42	1	50	(7)

Source: Countywide Planning Policies for Snohomish County, 2023

## NEIGHBORHOOD PARKS

The City of Mill Creek has determined that the Parks and Open Space **Level of Service (LOS) Standards for neighborhood parks is two usable acres of park land for every 1,000 persons.** In applying this standard, the term “usable park land” can be defined as land area suitable (e.g., not dominated by wetlands, steep slopes or other critical areas) for active and passive recreation uses. Based upon criteria established by the National Recreation and Parks Association, active uses within neighborhood parks include non-organized facilities such as basketball, tennis, and play equipment. Passive uses include open play areas, picnic areas, and nature trails.

The City currently has 43 acres of neighborhood parks that are well-distributed throughout the city limits, with the exception of the northwest corner. Neighborhood parks should generally be one to five acres in size, and where possible, **should be sited within a 1/4 to 1/2 mile walking radius to the neighborhood population groups served.** Thus, additional neighborhood park facilities to serve this neighborhood are discussed under Proposed Facilities.

Table 1 provides an assessment of how the City meets or does not meet the adopted Level of Service Standards for neighborhood parks.

## LEVEL OF SERVICE GUIDELINES

Unlike Level of Service Standards, Level of Service Guidelines are not mandated by the Growth Management Act. They are to be used by the City in guiding the design and development of parks, and in working with other jurisdictions or public agencies to encourage park and open space acquisition and facilities development within the City’s Municipal Urban Growth Area (MUGA).

Level of Service (LOS) Guidelines, unlike LOS Standards, are not intended to be used as design criteria for calculating the exact capacity of individual parks and are not subject to the concurrency requirement. In addition, the LOS Guidelines should not overshadow the role that high quality facilities, regular maintenance, and good programming play in the provision of a well-balanced parks and recreation system.

## COMMUNITY PARKS

Community parks should range between 5 and 35 acres and should ideally serve a population based on a **Level of Service Guideline of between five and eight acres per 1,000 persons.** The desired service area for community parks is a one- to two-mile radius of several neighborhoods that would contain a population of up to 15,000 residents. In areas that lack sufficient park facilities, community parks will serve a much larger area and population.

## REGIONAL PARKS

Regional parks should contain a minimum of 50 acres and should ideally serve a population based on a **Level of Service Guideline of seven acres per 1,000 persons.** Regional Parks use similar siting criteria and provide some of the same amenities as Community Parks such as ball fields, play equipment, restrooms, parking, picnic tables and trails.

Although these facilities are not subject to concurrency at this time, the City recognizes the need for these facilities in Mill Creek and the surrounding area. If adequate funding sources are identified through the Capital Improvement Plan process, the Parks, Recreation, and Open Space element may be amended to classify these facilities as an LOS Standard, subject to concurrency.

# Existing Parks, Pedestrian Facilities, and Open Space Inventory

## 1. Regional Parks:

### MCCOLLUM PARK

McCollum Park consists of 78 acres and is located just west of Dumas Road on the south side of SR 96. The park is ADA accessible and has a variety of amenities including picnic facilities, a BMX track, play equipment, walking trails, and ball fields. The Northwest Stream Center and Adopt-A-Stream Foundation Center are located here. The Northwest Stream Center offers room rentals, an interpretive boardwalk, and a variety of educational programs. In evaluating the Level of Service for Community Parks, 50 percent of the McCollum Park acreage was used to determine the current Community Park acreage provided in the MUGA.

The McCollum Park Park & Ride now serves the following Community Transit routes: 106, 109, 901, and the Swift Green Line and Swift Orange Line.

The McCollum Park Pool has been permanently closed as the site has been selected as the best County/publicly-owned site to develop the new Snohomish County Food & Farming Center. This facility will provide access to resources for the processing, aggregation, distribution, valued added production, and direct and wholesale sales of locally produced agricultural products.

### NORTH CREEK PARK

North Creek Park is located south of Mill Creek city limits and is owned and maintained by Snohomish County. This park is approximately 80 acres in size and is predominantly wetland and provides habitat for a wide variety of wildlife. Improvements include play equipment, a boardwalk with interpretive signs, picnic tables, restroom facilities, and parking. In evaluating the Level of Service Guidelines for Community Parks, 35 percent of the North Creek Park acreage was used to determine the current Community Park acreage provided in the MUGA.





## 2. Community Parks

### MILL CREEK SPORTS PARK

This park, located at Trillium Boulevard and SR 527, is 4.8 acres in size and includes a lighted, all-weather surface ball field (designed to accommodate Little League baseball, youth softball, and youth soccer), a skateboard park, restroom facilities, concession stand, tot lot, and parking.

### TAMBARK CREEK PARK

The City and County jointly own Tambark Creek Park, which is a 40-acre parcel located in the Tambark Creek corridor (east of 35th Avenue SE and north of 180th Street SE), outside of the city limits, but inside the City's Municipal Urban Growth Area (MUGA). Facilities include a restroom and picnic shelter, children's playground, off-leash dog area, trails, all-weather surface/lighted, baseball and soccer fields, and a parking area.

### MARTHA LAKE PARK

Snohomish County owns and maintains this 6-acre park that is adjacent to Martha Lake. The park is east of Interstate 5 and north of 164th Street SE. The park includes three fishing docks, lake access/beach including a swimming area with handicapped access, a playground, picnic tables and shelters, restroom, parking, and a wetland boardwalk.

### MARTHA LAKE AIRPORT PARK

This former airfield is located just north of Martha Lake and east of Interstate 5. The site is 28.76 acres in size and includes one soccer field, a Little League baseball field, skate park, playground, two picnic shelters, public art, walking trails, an enclosed dog park, and parking. A portion of the site is undeveloped, and the County is planning to develop the remainder of the site in the future for additional passive and active uses.

### 3. Neighborhood Parks

The City currently has eleven neighborhood parks within the city limits, and there is one neighborhood park in unincorporated Snohomish County within the City's MUGA. A brief description of each neighborhood park facility follows.

#### **BUFFALO PARK**

Buffalo Park consists of 1.25 acres and is located in the East Gateway Urban Village subarea at the intersection of 44th Avenue and 134th Street SE. Amenities include a restroom and picnic shelter, play equipment, traditional swings (including an ADA swing) and a disc swing, an ADA accessible spinner toy, benches, open grassy play area, and a Bocce Ball court.

#### **HERON PARK**

Heron Park consists of 3.8 acres and is located at the northeast corner of Village Green Drive and 155th Street SE. Amenities include a picnic shelter, restroom facilities, a playground with a play structure, picnic tables, a tennis court, walking paths, and a two-acre passive use area with a path surrounding a wetland/detention pond.

#### **HIGHLANDS PARK**

Highlands Park consists of 3.5 acres and is located within the Highlands neighborhood on Highlands Boulevard SE. Amenities include restroom facilities, a playground with a play structure, swings, picnic tables, a tennis court, a basketball court, and walking paths.

#### **LIBRARY PARK**

Library Park consists of 1.2 acres and is located adjacent to the Hammit Public Library on the east side of SR 527 at 156th Street SE. Amenities include a playground with a play structure, picnic tables, stage area, benches, and a walking path. A Veterans monument and a Sustainable Demonstration Garden are also located at Library Park.

#### **NICKEL CREEK PARK**

Nickel Creek Park consists of 19.75 acres and is located along the Nickel Creek corridor west of Seattle Hill Road, with an entrance from 164th Street SE. Amenities include a playground with play structure, a half basketball court, swings, and picnic tables.

#### **PINE MEADOW PARK**

Pine Meadow Park consists of 4.5 acres and is located south of 158th Street SE, on the west side of 35th Avenue SE. Amenities include restroom facilities, playground with play structure, picnic shelter, a half basketball court, and grassy play area.





### **PINE MEADOW PARK WEST**

Pine Meadow Park West consists of 1.5 acres of mostly wooded property located on the west side of 32nd Avenue SE at approximately 155th Place SE. The park is not developed but is planned for a trail and a picnic area.

### **COUGAR PARK**

Cougar Park consists of 5 acres and is located at 32nd Drive SE and 148th Street SE. Improvements include restroom facilities, playground, play structure, climbing rock, cable ride, picnic shelter, and open grass play area.

### **HILLSIDE PARK**

Hillside Park consists of 1.2 acres and is located within the Vineyards at Mill Creek subdivision on 12th Avenue SE. Amenities include a playground, play structure, picnic tables, and half basketball court.

### **SILVER CREEK PARK**

Snohomish County owns and maintains this 10.11-acre park that is accessed via 180th Street SE and 20th Drive SE, just south of the City of Mill Creek within the MUGA. This property was donated to Snohomish County for park and open space purposes in 1979 and 1987. Silver Creek Park features a gentle rolling meadow and stream corridor site, portions of which are under the Seattle City Light Transmissions line right-of-way. Amenities include walking trails, bridges, children's play areas, and a riparian corridor interpretation.

### **SILVER CREST PARK**

Silver Crest Park is .61 acres in size and is located within the Silver Crest subdivision on 28th Drive SE. Amenities include a full basketball court, playground, picnic tables, and a grassy play area.

### **EXPLORATION PARK**

Exploration Park is 1 acre in size and was dedicated to the City as a part of the development of the North Pointe subdivision. The park features a climbing boulder with tunnel, play structures, park furniture, and an open grass play area with landscape beds.



## 4. Pedestrian Facilities

The City of Mill Creek and its MUGA have an extensive system of sidewalks, paths, and public and private trails. Many of the trails located in the original city core are private trails located in neighborhoods and these trails provide connections to public trails and sidewalks. An inventory of primary public trails and sidewalks is included in the Transportation element.

## 5. Open Space/Greenway

### SEATTLE CITY LIGHT TRANSMISSION LINE RIGHT-OF-WAY

Located in unincorporated Snohomish County south of the city limits, these properties include the Olympus Meadows and the Transmission Line/Misty Manor properties. This linear open space is situated mainly under the Seattle City Light transmission line corridor. A pedestrian trail utilizes an existing service road.

### RHODY RIDGE ARBORETUM

Rhody Ridge Arboretum is owned by Snohomish County, is 11 acres in size, and features a botanical garden. The property is located at 17427 Clover Road south of 164th Street and just west of the city limits. The facility is a private/life estate facility. Tours are available by appointment only.



# Proposed Facilities

Through application of the adopted parks, recreation, and open space goals and policies, the following public park and recreation facilities are needed to serve the population within the City of Mill Creek and MUGA:

- » Expansion of/or additional community park facilities, including ball fields;
- » A recreation/community center;
- » Additional neighborhood parks and/or park facilities;
- » Trails for hiking, bicycling and jogging (see the Transportation Element for a description); and
- » Mini Parks.

In order to help meet the Level of Service Standards and Facility Guidelines during the planning period, several parks, trail/pedestrian, and open space facilities were identified. These facilities are designated on the Parks and Open Space map.

The general locations of these facilities (not in priority order) include the following:

## 1. Open Space:

The Thomas Lake open space corridor is located east of 35th Avenue SE and south of 132nd Street SE. The developer of the Farm has restored parts of the Penny Creek wetland complex as mitigation for their project. That created and protected this open space. A publicly accessible trail through the buffer ties into the existing sidewalk system.

## 2. Community Parks:

Expand the Mill Creek Sports Park.

Coordinate joint use of Everett School District Facilities for organized sports.

## 3. Neighborhood Parks:

If feasible, include a neighborhood park component with the expansion of Mill Creek Sports Park.

## 4. Mini Parks:

Within each new residential development not within a one-half mile of an existing or planned neighborhood park, provide Mini Parks.

## 5. Pedestrian Facilities:

The majority of the North Creek Trail has been constructed in conjunction with residential development in the Mill Creek Town Center and vicinity. The final section along 9th Avenue SE between 164th Street SE and North Creek Park is planned for future construction, primarily by private developers in conjunction with land development. City participation in completion of the trail may also be appropriate if funding sources can be identified.

Additional discussion of proposed pedestrian and bicycle facilities is contained in the Transportation element.

# Implementation Strategies

The implementation of the proposals within the Parks element requires the acquisition and development of public park facilities by the City as well as other jurisdictions. The preservation of open space corridors can also occur through the dedication of conservation easements and/or setting aside, in perpetuity, critical areas and buffers in protected tracts on private and public property.

As noted earlier, the City currently exceeds the Level of Service Standard for neighborhood parks. While this standard is being met for the City's overall population, the existing facilities are not easily accessed by the residential population located west of SR 527. Thus, the following implementation strategies include development of additional neighborhood park facilities west of SR 527, as well as additional community park facilities, open space greenways, and pedestrian paths. The funding for development of neighborhood and community park facilities will occur primarily through the City's Capital Improvement Plan, together with applications for other grant opportunities.

## 1. Community Parks

The City has taken steps to provide community park facilities for City and MUGA residents. Construction of the Mill Creek Sports Park was completed in January 2004. This park contains a lighted active use field, concession stand, restrooms, skate park, and parking. Between 2008 and 2021, the City purchased approximately 19 acres of property adjacent to the Mill Creek Sports Park. All or a portion of this property could be used to expand the Mill Creek Sports Park for active and passive uses, indoor and outdoor recreation, and community gathering places.



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Additional community park facilities are needed to fulfill the active park needs of the residents of the entire City and MUGA, making the development of community park land a high priority. The City may act independently and/or participate with other jurisdictions or agencies to acquire and/or develop a site. The City could also pursue an agreement as to the role of the City and other jurisdictions or agencies in designing, constructing, enhancing programming, and maintaining the improvements and programs that would be available to the public. Mitigation fees assessed on adjacent developments and contributions from other developments in the community will assist in the acquisition and development of the property. Preliminary visioning for this property has started, and planning and phased development activities are starting to be programmed in the City's Capital Improvement Plan.

## 2. Neighborhood Parks

The City has achieved an overall level of service of 2.3 acres of neighborhood park per thousand population. While this exceeds the level of service standard, the area west of SR 527 does not have a designated neighborhood park.

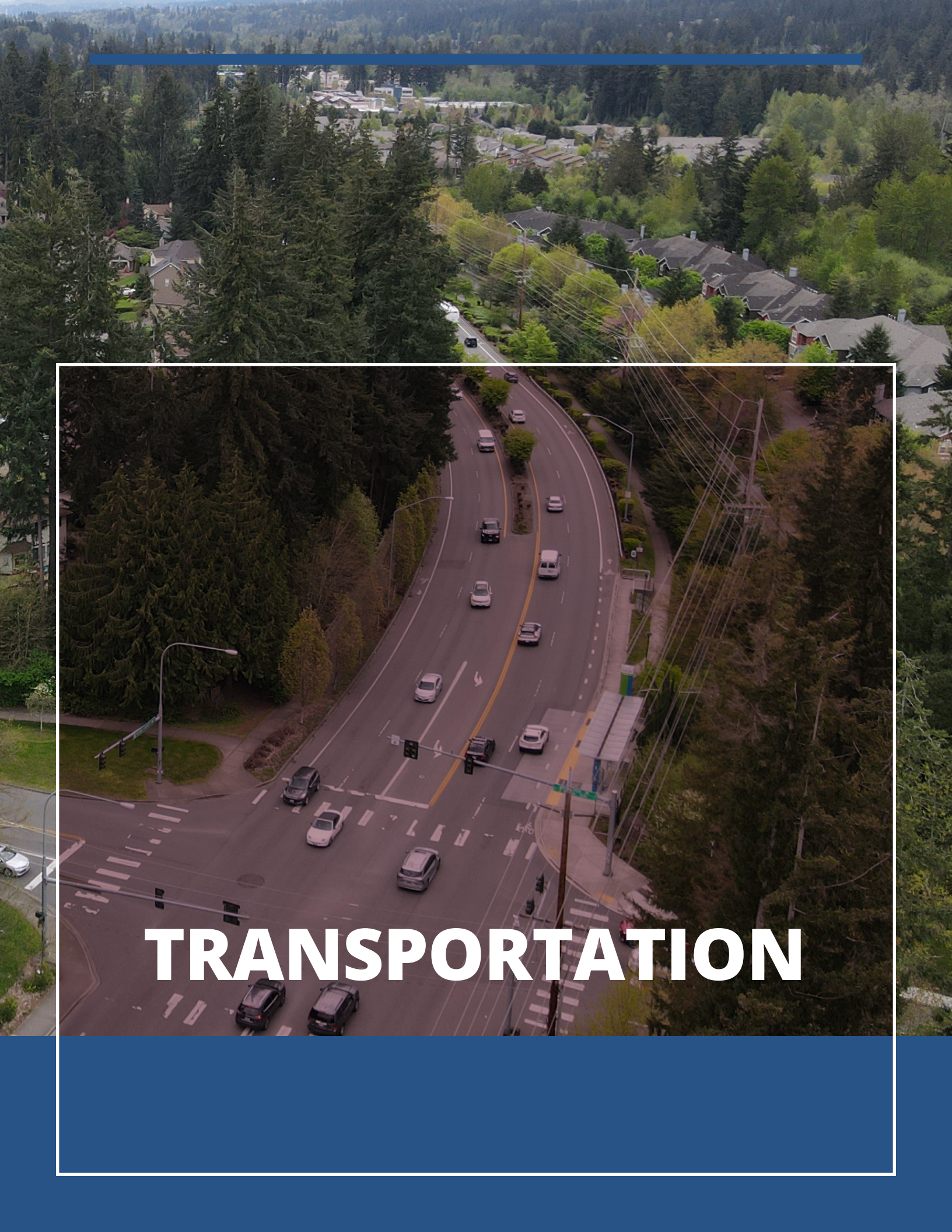
The following neighborhood park project is of high priority for development:

### **SR 527 CORRIDOR NEIGHBORHOOD PARK**

The 1998 SR 527 Corridor Subarea Plan assumed a population target of 3,852 new residents in the Subarea, with a corresponding need for 7.7 acres of neighborhood park. That housing has been built, primarily as multifamily housing, which provided some private play structures and open areas, but public neighborhood park elements to serve the western portion of the community should be developed. An important feature in the development of a western neighborhood park is to provide safe and efficient access to existing neighborhoods east of SR 527 as well as to the Mill Creek Town Center, the North Creek Trail and the Sports Park. These neighborhood park elements could be developed in conjunction with the expansion of the Sports Park.

## 3. Mini Parks

Individual, small tot lot parks within residential developments may be privately developed, owned and maintained by homeowners' associations. Mini parks located in areas that are accessible to the general public may be either privately or publicly developed, owned, and maintained.



# TRANSPORTATION

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# Introduction

**The Transportation element addresses the multimodal transportation needs of the City of Mill Creek. The Transportation element considers existing and planned land uses within the City and the Municipal Urban Growth Area (MUGA) and has been developed in accordance with Countywide Planning Policies.**

This element has also been developed consistent with the VISION 2050 and the Regional Transportation Plan 2022-2050 regional land use and transportation plans to ensure that the city's transportation system is consistent and contributes toward the regional transportation network. In addition, it enables the City to participate in federal and state funding programs.

The purpose of the Transportation element is to:

- » Provide a long-range forecast of future transportation facilities and services to adequately support the land uses established in the City's Comprehensive Plan and population forecasts.
- » Include policies to ensure that adequate transportation facilities are available to meet anticipated demand.
- » Provide an inventory of the city's existing multimodal transportation facilities.
- » Establish Level of Service Standards and Guidelines to measure the adequacy of those facilities.
- » Evaluate the capacity of existing multimodal transportation facilities.
- » Identify and prioritize transportation needs that are incorporated into the six- year Capital Improvement Plan (CIP) to meet established Level of Service Standards and Guidelines.
- » The CIP is a separate City document and identifies specific capital improvement projects and funding sources, including impact mitigation fees. The CIP is updated every two years in conjunction with the biennial budget and is adopted as part of the Transportation element by reference.

# TRANSPORTATION GOALS AND POLICIES

## GOAL T-1

Coordinate with Puget Sound Regional Council, Snohomish County, Sound Transit, and surrounding jurisdictions to ensure consistency among agencies in implementing the Regional Transportation Plan and Regional Growth Strategy.



### **POLICY T-1.1**

Develop and operate an efficient multimodal system that supports the Regional Growth Strategy in coordination with neighboring jurisdictions and regional agencies.

### **POLICY T-1.2**

Maintain and operate transportation systems to provide safe, efficient, and reliable movement of people, goods, and services.

### **POLICY T-1.3**

Continue to work with and support WSDOT, the Port of Everett, Sound Transit, Community Transit, and other agencies that connect and provide transportation services to Mill Creek and the surrounding community.

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## **POLICY T-1.4**

Reduce the need for new capital improvements through investments in Intelligent Transportation System technology, demand management strategies, and operational activities that improve the efficiency of the current systems.

## **POLICY T-1.5**

Emphasize transportation investments that provide options to walk, roll, bike, and take transit, especially to and within mixed-use centers and to connect with regional centers, including future light rail stations outside of Mill Creek.

## **POLICY T-1.6**

Adopt and implement development regulations to encourage new land uses that facilitate multi-purpose trips, minimize the number and length of vehicle trips, and increase multimodal street connectivity, especially to and within the mixed-use centers.

## **POLICY T-1.7**

Adopt and implement development regulations to facilitate deliveries and passenger pick-up/drop-off activity, especially to and within mixed-use centers.

## **POLICY T-1.8**

Increase the resiliency of the transportation system, protect it against disasters, develop prevention and recovery strategies, and plan for coordinated emergency responses.

## **POLICY T-1.9**

Continue to work with local, regional, and state agencies to respond to emerging trends and technologies in transportation, especially to facilitate travel to and within mixed-use centers. (Examples: Electric vehicle charging stations, automated and connected vehicles, on-demand smart signals, E-bikes, and micromobility)

## GOAL T-2

**Orient the Mill Creek transportation system toward people walking, rolling, and biking, and ensure that it is accessible and safe for all.**



### **POLICY T-2.1**

Provide pedestrian facilities on both sides of all roadways throughout Mill Creek and connect with other public and/or private paved trail systems.

### **POLICY T-2.2**

Separate sidewalks on public streets with a planting strip to increase pedestrian safety and comfort of travel and avoid potential conflicts with vehicular movements. Incorporate aesthetic features where appropriate, such as a serpentine or meandering configuration, to be consistent with existing community character.

### **POLICY T-2.3**

Provide bicycle facilities on all arterial and collector roadways to enhance active transportation connectivity and provide traffic calming effects.

### **POLICY T-2.4**

Ensure that pedestrian and bicycle facilities connect neighborhoods to transit stops with amenities such as lighting, seating, shelters, and boarding pads.

### **POLICY T-2.5**

Design multiuse paths to accommodate people walking, rolling, and biking within and connecting parks, schools, recreational amenities, and major open space corridors.

### **POLICY T-2.6**

Reduce travel time and distance for people walking, rolling, biking, and taking transit by providing new connections such as crosswalks, neighborhood cut-through paths, and pedestrian-oriented alleyways.



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### **POLICY T-2.7**

Consider equity and equal access when planning for transportation improvements, programs, and services, including for historically underserved communities and vulnerable populations.

### **POLICY T-2.8**

Implement transportation programs and projects that are accessible to all people of the community, including people with disabilities, older adults, youth, people with no or low income, and people with special needs.

### **POLICY T-2.9**

Comply with the federal Americans with Disabilities Act (ADA), current Mill Creek ADA Transition Plan, and enact appropriate design standards for all sidewalks, intersection corners, crosswalks, and multiuse paths.

### **POLICY T-2.10**

Identify specific pedestrian and bicycle improvements along priority route segments to create a safer and more comfortable system by developing an active transportation plan.

## GOAL T-3

Focus on transportation investments that minimize impacts to the natural environment and promote a healthy community.



### **POLICY T-3.1**

Develop strategies to reduce greenhouse gas emissions and negative climate change impacts, such as promoting compact mixed-use development centers served by transit, constructing a well-connected pedestrian and bicycle system, and implementing Transportation Demand Management programs.

### **POLICY T-3.2**

Participate in efforts by county, regional, and state agencies to improve programs and management strategies designed to prevent and reduce contamination of street runoff and storm water and improve fish passage.

### **POLICY T-3.3**

Develop the transportation system to encourage physical activity, provide access to nature, and improve safety.

### **POLICY T-3.4**

Improve existing street tree canopies to increase pedestrian safety and comfort, produce traffic calming effects, and support the natural environment.

## GOAL T-4

Pursuant to the Growth Management Act, maintain an inventory of Mill Creek's transportation facilities and establish appropriate Level of Service Guidelines and Standards.



### **POLICY T-4.1**

The Transportation Element shall include inventories of all major transportation modal networks, including automobile, transit and freight; and pedestrian and bicycle facilities; and multiuse paths.

### **POLICY T-4.2**

In coordination with WSDOT and PSRC, the City of Mill Creek adopts the Level of Service (LOS) Guidelines and Standards listed below for State Highways and City intersections.

#### **State Highway LOS Guidelines Designated by PSRC**

- » LOS E/mitigated (access/signal timing/transit) for SR 96 and SR 527

#### **Mill Creek LOS Standards for City Intersections**

- » LOS C for local residential to local residential intersections
- » LOS D for local residential to collector; collector to collector; and collector to arterial intersections
- » LOS E for all other city intersections

### **POLICY T-4.3**

Adopt and implement development regulations and a transportation concurrency management program based on the adopted level of service standards for vehicles, walking, biking, and transit.

### **POLICY T-4.4**

Maximize the utility of the existing transportation system and lower overall life-cycle costs through effective maintenance and preservation programs.

## GOAL T-5

Identify funding strategies to address the future needs of the transportation system and coordinate these strategies with neighboring jurisdictions and regional agencies.



### **POLICY T-5.1**

Biannually update and prioritize transportation improvement projects within Mill Creek's six-year Capital Improvement Program.

### **POLICY T-5.2**

Pursue alternative transportation financing methods, such as transportation benefit districts, user fees, and other potential options to support ongoing maintenance, preservation, and operation of the transportation system.

### **POLICY T-5.3**

Utilize the 20-year project list and finance plan to incorporate fiscally constrained and implementable projects into the Transportation Impact Fee (TIF) program and six-year Capital Improvement Program.

### **POLICY T-5.4**

Pursuant to the Growth Management Act, if probable funding will be insufficient to meet the established Level of Service Standards for transportation facilities, reassess the Land Use Element and/or the Level of Service Standards and adjust as necessary.

### **POLICY T-5.5**

Coordinate the planning, design, and financing of transportation facility improvements with the transportation and land use plans of neighboring jurisdictions to identify opportunities to maximize benefits with limited financial resources.

### **POLICY T-5.6**

Identify opportunities to partner with new developments, private organizations, and regional transit agencies to provide additional intra-city transit service connections.



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# TRANSPORTATION SUPPORTING ANALYSIS

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## Growth Management Act Transportation Element Requirements

**The Growth Management Act (GMA) includes requirements for all local jurisdictions' Transportation elements. In addition to requiring that this element be consistent with the Land Use element of the Comprehensive Plan, the GMA requires that the element includes:**

- » An inventory of multimodal transportation facilities and services for both City and State owned systems.
- » Level of Service (LOS) Standards and Guidelines for multimodal facilities.
- » Specific actions necessary for local transportation facilities and services to meet the established Level of Service Standards.
- » A forecast of traffic for at least 10 years, including land use assumptions.
- » A projection of the local and state transportation system needs to meet current and future travel demand.
- » Analysis of future funding to judge needs against resources.
- » A multi-year finance strategy that serves as the basis for the six-year Capital Improvement Plan.
- » Intergovernmental coordination and impact assessment.
- » Strategies for reducing travel demand.

The Washington Administrative Code (WAC 365-196-430) also provides guidance on two important requirements of the GMA:

- » Consistency between the elements of each county's comprehensive plan and comprehensive plans of cities within its borders; and
- » Consistency between the land uses established in the Land Use Plan and the transportation improvements identified in the Transportation element needed to serve the land uses.

This Transportation element contains all the GMA required elements.

## Land Use Assumptions

Land use assumptions for the Transportation element include information contained in other elements of the Comprehensive Plan. Key assumptions include:

- » Mill Creek is a relatively compact community within the larger urban area of south Snohomish County.
- » The traffic volumes on regional arterials that provide easy access for through city traffic will increase at a relatively constant rate in parallel with regional land development activity. The city is largely built out and volumes generated by new developments within most of the current city limits have stabilized, with the exception of South Town Center, which is planned to generate significant redevelopment.
- » The city's population and employment growth are expected to continue in accordance with the 2044 land use projections.

## Multimodal Level Of Service Standards and Guidelines

**To determine the existing and projected capacity of multimodal transportation facilities, two different means or tools have been established, Level of Service Standards and Level of Service Guidelines.**

### Level of Service Standards

Level of Service Standards (LOS) are binding requirements subject to the concept of concurrency under the Growth Management Act (Act). Briefly stated, the Act prohibits

jurisdictions from approving a development if the development causes the Level of Service to decline below the minimum standard adopted for a specific transportation facility, unless improvements or strategies to accommodate the impacts of development are made concurrent with development.

In addition, the Act defines "concurrent with development" as the required improvements or strategies in place at the time of development, or a financial commitment to complete the improvements or strategy within six years. Capacity projects necessary to meet the established Level of Service Standards for transportation facilities are included in the six-year Capital Improvement Plan, which is adopted every other year in conjunction with the biennial budget.

For other non-land development related transportation items, such as capital improvement or maintenance projects, the LOS standards serve as criteria to be used in planning and implementing appropriate agency actions.

### Level of Service Guidelines

Although not required by the Growth Management Act, Level of Service Guidelines are established for other transportation facilities provided by the City. These include regional highways outside the City's jurisdiction, pavement condition, pedestrian facilities, multiuse paths, bicycle facilities, and public transit. Level of Service Guidelines, in contrast to Level of Service Standards, are not subject to concurrency and are used as general recommendations for guiding the design and development of the remaining transportation facilities. Capital improvement projects based on the Level of Service Guidelines are also funded within the six-year Capital Improvement Plan.

# Inventory And Capacity Analysis

Transportation facilities addressed in the Transportation element include the following:

- » Streets
- » Pavement Management
- » Pedestrian Facilities
- » Multiuse Paths
- » Bicycle Facilities
- » Transit

Presented below and on the following pages is an inventory of the existing transportation facilities located within the City and an analysis of their current capacity in relation to established Level of Service Standards and Guidelines.

## Street System

### 1. INVENTORY OF EXISTING STREET SYSTEM FACILITIES:

As of 2024, the City owns and maintains approximately 77 lane miles of residential and local streets, 19 lane miles of collector streets and 10 lane miles of arterial streets for a total of 106 lane miles of roadway. A detailed breakdown of this roadway inventory can be found in the City's Pavement Management System. Mill Creek also owns eight traffic signals, which are operated and maintained by Snohomish County.

In addition, there are 22 lane miles of two state highways within the city limits, SR 96 and SR 527, which are under the jurisdiction and operational control of the Washington State Department of Transportation (WSDOT). There are fourteen traffic signals on these two major roadways that are owned, operated, and maintained by WSDOT. If the population of the City reaches 25,000, the operation and maintenance of these signals will become the responsibility of Mill Creek.

The Street Functional Classification Map shown below illustrates the location and layout of

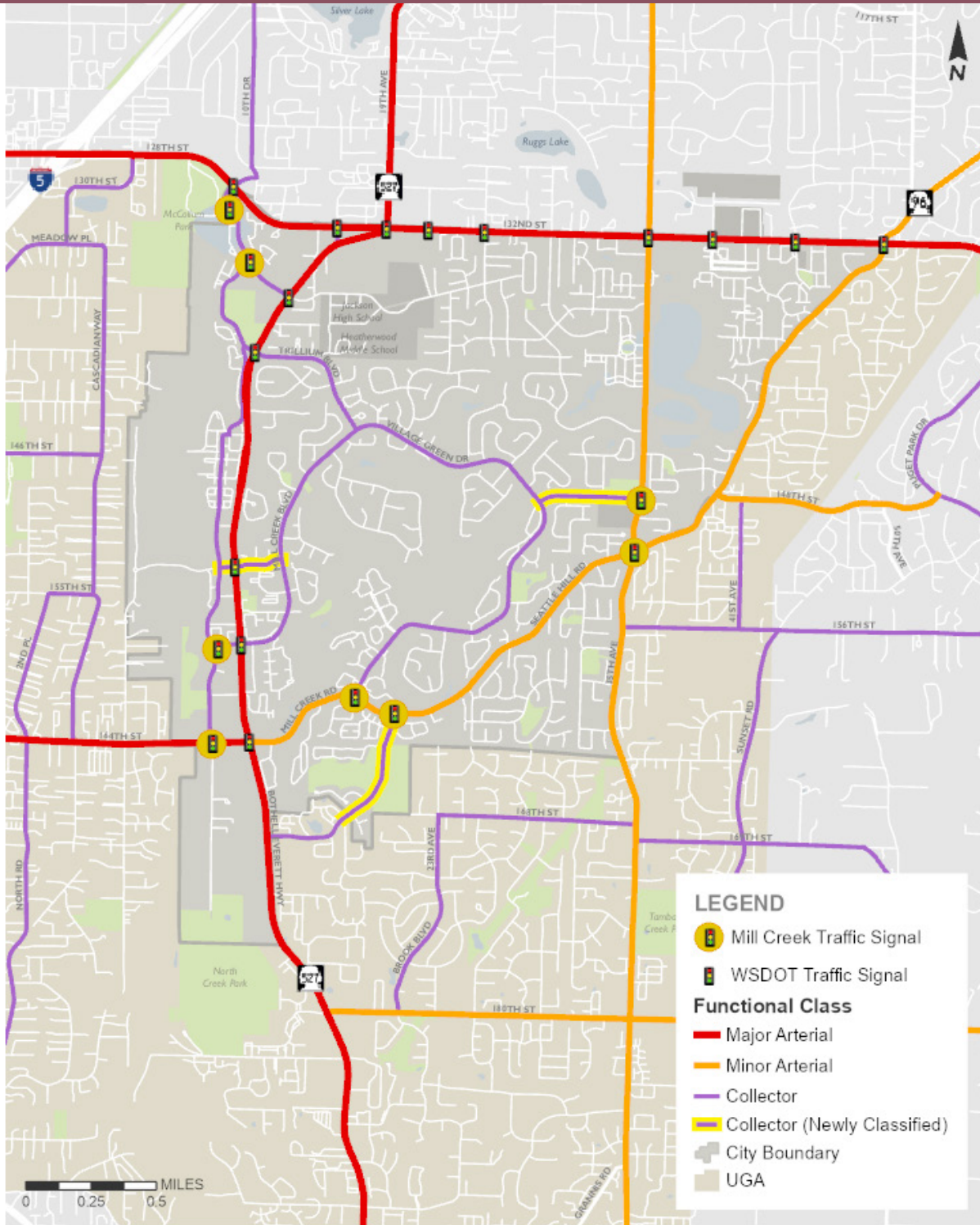
the dedicated public streets and traffic signals within the City, as well as the classification of the arterials, collectors, and local streets.

Freight routes are an important part of the transportation system. Delivery of goods to residents and businesses supports jobs and the local economy. All collector and arterial streets in the city are classified as freight routes in WSDOT's Freight and Goods Transportation System (FGTS), ranging from a T-2 to a T-3 classification. More detailed information is available on WSDOT's webpage for FGTS.

Historical collision data were provided by WSDOT for the four-year period from 2019-2023 (the most recent data available). The reported collision types and number of collisions in the city are shown below in the Crash History Map. As shown, a high concentration of collisions occur along the two state highways, both of which experience higher traffic volumes and vehicle speeds compared to most other roadways within the city.



FIGURE 01. Roadway Functional Classification



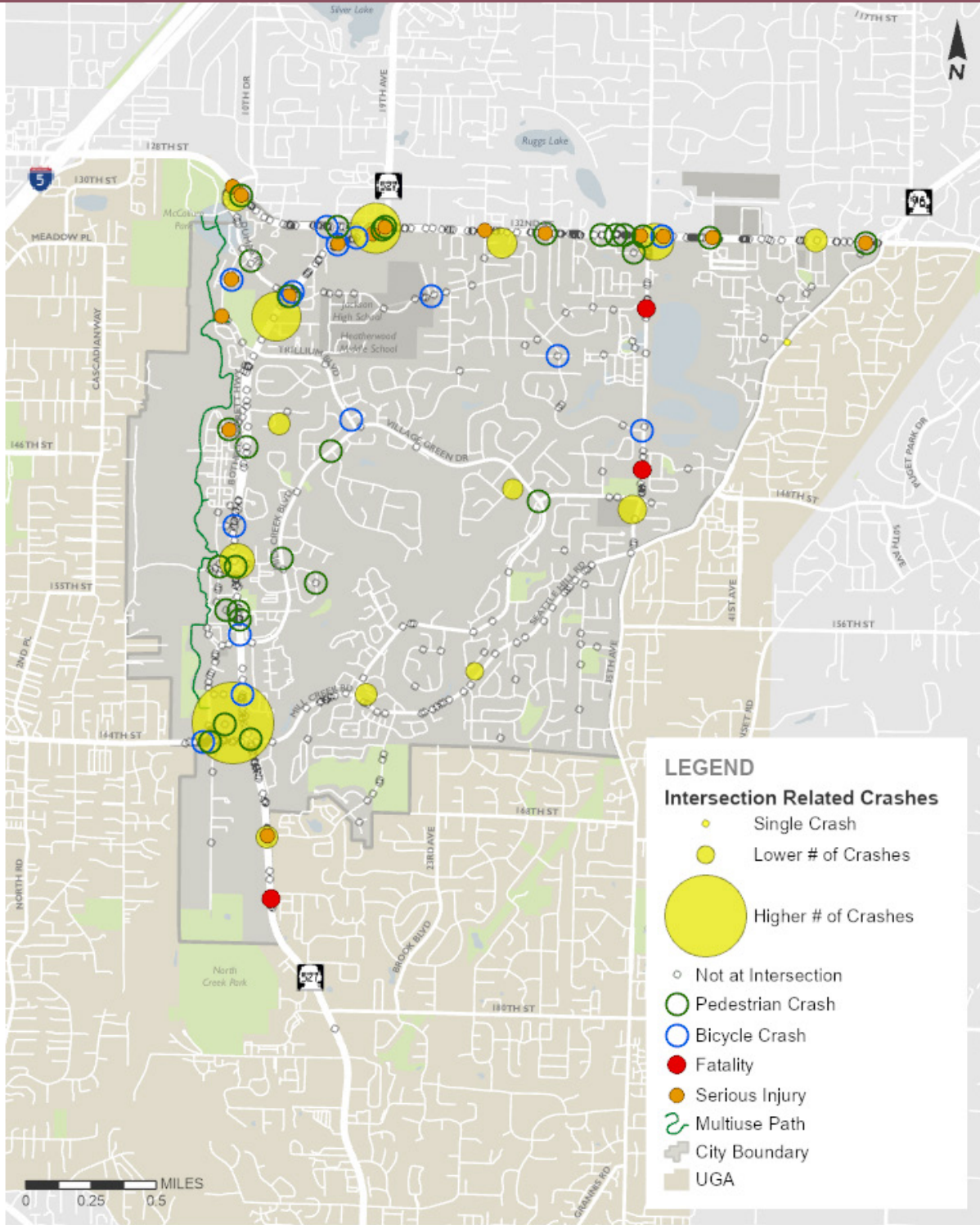
## Roadway Functional Classification

Mill Creek Comprehensive Plan



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FIGURE 02. **Crash History (Years 2019-2023)**



**Crash History (Years 2019 - 2023)**  
 Mill Creek Comprehensive Plan



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Existing traffic volumes were collected through field observations to reflect 2024 baseline conditions. Future volumes are based on land use assumptions within the city limits and the surrounding MUGA as stated in the Land Use and Population and Employment Elements.

A traffic growth rate was determined based on regional traffic model outputs from the Puget Sound Regional Council (PSRC). PSRC maintains a traffic model that reflects anticipated land use, economic, and population changes through 2050. Four select roadway links in and around Mill Creek were used to identify how traffic patterns will develop over the next 20 years:

1. SR 96, east of I-5
2. SR 527, north of Mill Creek Town Center
3. 164th Street SE, west of SR 527
4. SR 96, east of 35th Avenue SE

PSRC provided data for 2018 and forecasted 2050 traffic volumes. Using these values, an average annual growth rate was established for each link. The annual growth rates for the select links were 1) 0.30 percent, 2) 0.40 percent, 3) 0.43 percent, and 4) 0.38 percent, respectively. These values were averaged to obtain a city-wide growth rate that was applied to each intersection: 0.38 percent. Volumes from the existing conditions model were increased by this annual growth rate for 20 years to obtain 2044 volumes. This resulted in a 7.6 percent increase in traffic volumes from 2024 data.

## **2. CAPACITY OF EXISTING STREET SYSTEM FACILITIES:**

The existing capacity of the city's street system can be measured by comparing the current Level of Service to the established minimum LOS Standards and Guidelines.

## **3. LEVEL OF SERVICE STANDARDS AND GUIDELINES FOR INTERSECTIONS:**

The established peak hour Level of Service Standard for intersections within the City's jurisdiction ranges from C to E depending on the roadway classification. This is because a large percentage of the traffic on the city's arterials is from "pass through" trips that come from people who live outside Mill Creek but travel on city streets or one of the state highway routes passing through the city.

To address traffic impacts from development, the city utilizes a traffic mitigation program that requires a fee paid for each new PM Peak Hour trip. The City also has an Interlocal Agreement with Snohomish County to collect mitigation fees from County developments in the surrounding MUGA. The money collected with the City and County traffic mitigation programs is used to fund various projects that will improve the capacity and safety of the roadway network.

The Puget Sound Regional Council has designated SR 96 and SR 527 as Regionally Significant State Highways (RSSH) and established that the minimum intersection LOS should be an "E/ mitigated". If the LOS falls below "E" on an RSSH, mitigation measures or capacity projects should be implemented to reduce congestion. Typical mitigation strategies include, but are not limited to, access management, traffic signal timing and coordination, or transit service improvements.

However, the City has no operational control over the roadway facilities on the RSSH, which are under the jurisdiction of WSDOT. Likewise, Snohomish County owns and controls the road network in the surrounding MUGA. Ultimately, Mill Creek is subject to a significant amount of traffic it did not create and cannot control. Consequently, the City Level of Service on the RSSH is established as a Guideline rather than a Standard.



There are a limited number of north-south routes to move traffic within the south Snohomish County region, and even fewer east-west routes. Construction of new routes or expansion of existing roadways is severely constrained by existing private property developments and environmental features such as creeks and wetlands. It is not practical for the City to build its way out of congestion, and the only way to improve traffic will be to encourage people to use other modes of transportation.

Since it is not always feasible to construct a roadway system to handle the maximum traffic volume, the City recognizes that significant delays occur during the peak commuting hours. Mill Creek coordinates with transit agencies, Snohomish County, and WSDOT to improve local bus service and plan capital improvement projects on regionally significant corridors such as the Regionally Significant State Highway (RSSH) and 164th Street SE.

The following are the peak hour Level of Service Standards and Guidelines for both City-controlled and RSSH intersections. The LOS evaluation is typically conducted during the PM peak hour but may also be during the AM peak hour for a development such as a school, or during a weekend for a development such as a church.

## Intersection Peak Hour LOS Standards for City Streets

- » C for local-to-local intersections
- » D for collector-to-collector, collector-to-local and collector-to-arterial intersections
- » E for all other city intersections

## Intersection Peak Hour LOS Guidelines for Regionally Significant State Highway (RSSH)

- » E/mitigated per Puget Sound Regional Council

Consistent with the current edition of the Federal Highway Capacity Manual, the Level of Service is determined by measuring individual intersections and ranges between grades A and F, where A has the shortest delay and F has the longest delay. A description of the Level of Service grades for both signalized and stop controlled intersections is shown in Table 1.

TABLE 01.

## Definition of Levels of Service

SIGNALIZED INTERSECTION	
LOS A	Delay < 10 seconds per vehicle.
LOS B	Delay > 10 and < 20 seconds per vehicle.
LOS C	Delay > 20 and < 35 seconds per vehicle.
LOS D	Delay > 35 and < 55 seconds per vehicle.
LOS E	Delay > 55 and < 80 seconds per vehicle.
LOS F	Delay > 80 seconds per vehicle.
STOP CONTROLLED INTERSECTION	
LOS A	Delay < 10 seconds per vehicle.
LOS B	Delay > 10 and < 15 seconds per vehicle.
LOS C	Delay > 15 and < 25 seconds per vehicle.
LOS D	Delay > 25 and < 35 seconds per vehicle.
LOS E	Delay > 35 and < 50 seconds per vehicle.
LOS F	Delay > 50 seconds per vehicle.

### 4. FINDING:

As shown in Table 2, the 2024 peak hour Level of Service meets the established minimum Level of Service Standard for city streets. However, one intersection on the RSSH is at or below the minimum Level of Service Guidelines. The same results are found for the 2044 peak hour.

Traffic from future development in both the city limits and unincorporated Snohomish County will impact the roadway network's Levels of Service. Capital improvements, mitigation measures and other strategies will be necessary in the six-year CIP over the 20-year planning period to improve the city's transportation system.

TABLE 02.

**Peak Hour Level of Service**

LOCATION	MINIMUM LOS	2024 LOS	2044 LOS
<b>REGIONALLY SIGNIFICANT STATE HIGHWAYS (RSSH)</b>			
SR 527 at 164th Street SE	E/mitigated	F	F
SR 527 at 153rd Street SE	E/mitigated	C	C
SR 527 at Trillium Blvd	E/mitigated	B	B
SR 527 at Dumas Road	E/mitigated	C	C
SR 527 at SR 96	E/mitigated	D	D
SR 96 at Dumas Road	E/mitigated	C	D
SR 96 at 35th Avenue SE	E/mitigated	E	E
SR 96 at 39th Avenue SE	E/mitigated	D	D
<b>CITY TRAFFIC SIGNALS</b>			
164th Street SE at Mill Creek Blvd	E	D	D
35th Avenue SE at 148th Street SE	D	B	B
35th Avenue SE at Seattle Hill Road (w/SnoCo)	E	D	E
<b>CITY STOP CONTROLLED INTERSECTIONS</b>			
Main Street at 153rd Street SE	D	B	B
25th Avenue SE at 136th Street SE	C	A	A
Mill Creek Blvd at 161st Street SE	E	B	C
35th Avenue SE at Silver Crest Drive	D	D	D
Seattle Hill Road at 32nd Avenue SE	E	C	C
Village Green Drive at Trillium Blvd	D	B	B
Village Green Drive at 148th Street SE	D	B	B

# Pavement Management System

## 1. PAVEMENT INVENTORY:

The roadway network is one of the City's most valuable assets and should be maintained in good condition. Pavement does not deteriorate at a linear rate, and its condition will rapidly decline in the last few years of its life span. It is much more cost effective to intervene early and maintain a roadway in good condition rather than let it fall into disrepair. The cost to rebuild a failed roadway can be 10 times greater than to maintain it with a preservation treatment.

As of 2024, the City owns and maintains approximately 77 lane miles of residential and local streets, 19 lane miles of collector streets and 10 lane miles of arterial streets for a total of 106 lane miles of roadway.

## 2. ADEQUACY OF EXISTING PAVEMENT MANAGEMENT SYSTEM:

The adequacy of the pavement management system can be measured by comparing the inventory of facilities with the adopted Level of Service Guidelines.

## 3. LEVEL OF SERVICE GUIDELINES FOR PAVEMENT MANAGEMENT:

The following Level of Service Guidelines are established for the City's Pavement Management System:

- » The City should implement and maintain a pavement management system to inventory, evaluate, prioritize, plan and budget for future pavement preservation needs.
- » The City should perform a visual condition rating of the entire roadway network no less than once every three to five years.
- » The City should maintain a minimum average Pavement Condition Index (PCI) rating of 71 for all roadways.
- » Pavement patching should be done in accordance with City standards.



#### 4. FINDING:

- » The City currently utilizes an online pavement management system that is common to most agencies in the Puget Sound region.
- » The City has performed a citywide visual pavement rating in 2012, 2015, 2020, and 2024.
- » As of 2024, the existing average PCI for all roadways is 86.

Existing pavement management practices are adequate to meet the established Level of Service Guidelines. However, due to a backlog of maintenance, additional resources are required to restore roads that are below the minimum Level of Service. New preservation techniques and systems may be required in the future to maintain the roadway network in good condition.

## Pedestrian Facilities System

The city has an extensive pedestrian facilities system consisting of approximately 75 miles of public sidewalks and over 1,000 curb ramps. A map of the available pedestrian facilities along major roadways and school routes are shown below on the Existing Sidewalks and Paths map.

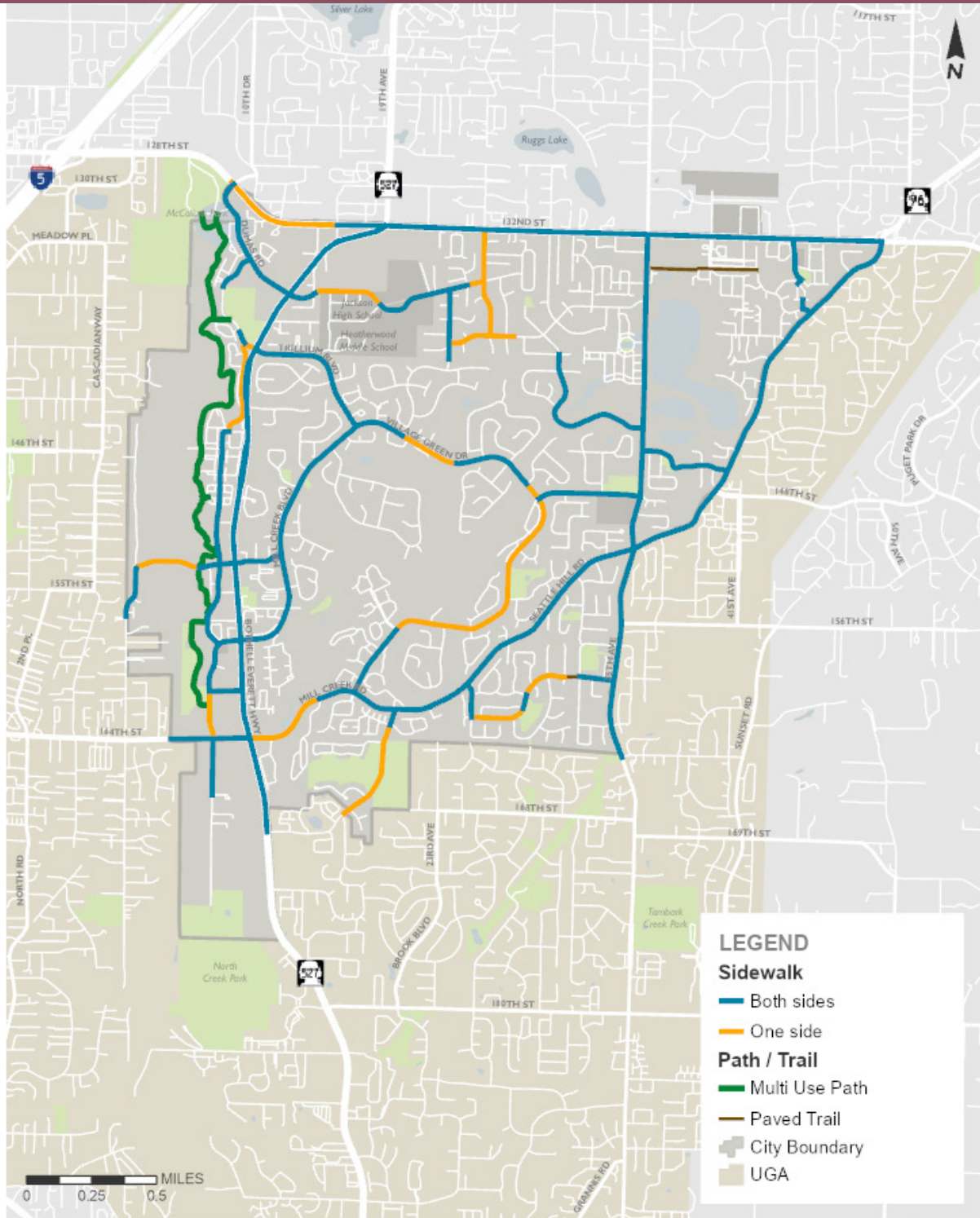
A map of the city's identified routes to prioritize walking and biking are shown on the Pedestrian and Bicycle Potential Priority Routes Map. These priority routes emphasize corridors that connect residents to destinations such as mixed-use and commercial centers, schools, and recreational activities. Corridors identified as Primary or Secondary Routes do not indicate a hierarchy for future pedestrian and bicycle facility development or highlight the type of facility that should be implemented, rather they are used to make a distinction between routes that are more regional or that extend completely through the community (Primary), and those that link Primary Routes and destinations with local neighborhoods (Secondary). Existing gaps in walking infrastructure along these priority routes are shown below on the Pedestrian Priority Route Gaps Map.



North Creek Trail



FIGURE 03. Existing Sidewalks and Trails



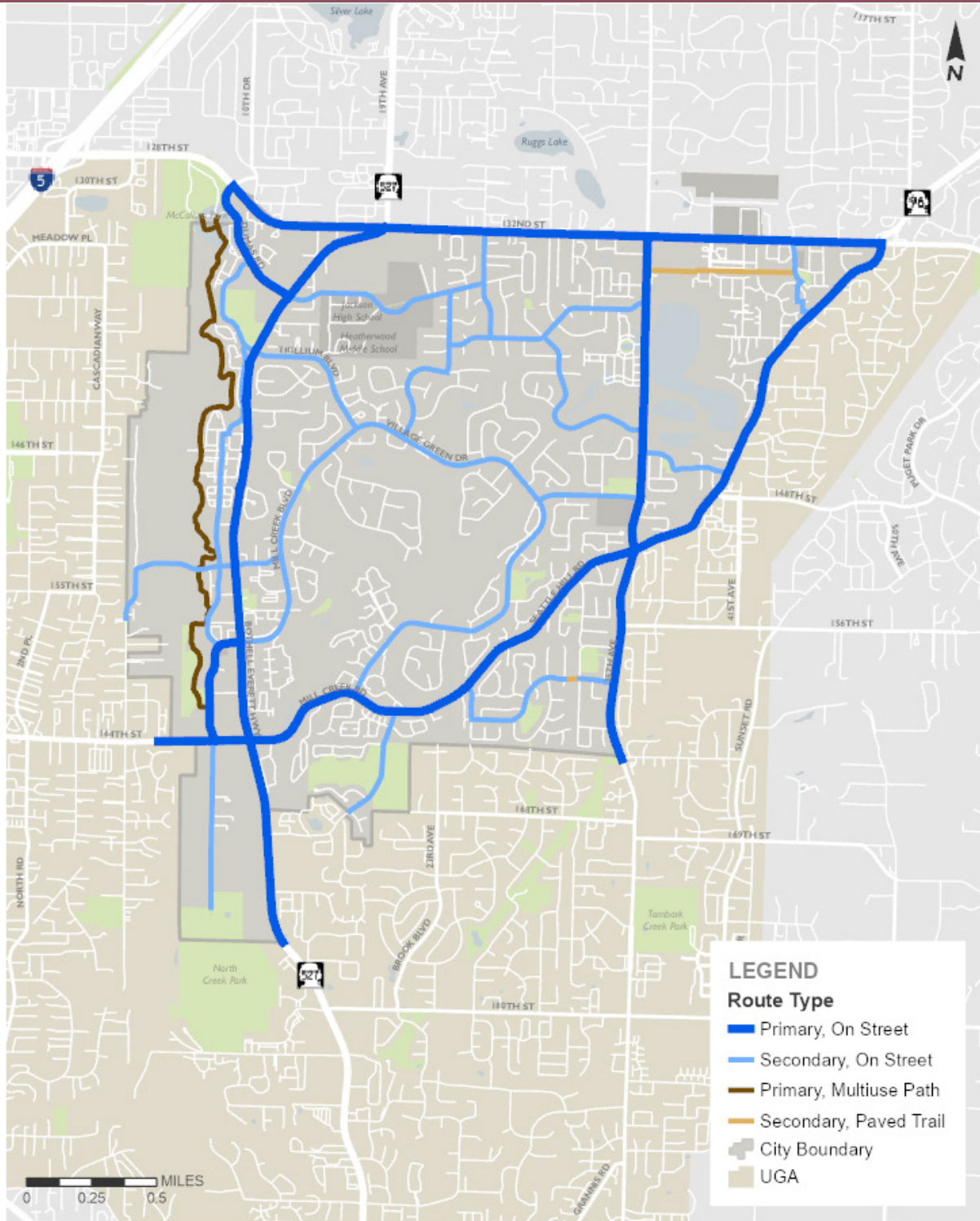
### Existing Sidewalks and Trails

Mill Creek Comprehensive Plan



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FIGURE 04. Pedestrian and Bicycle Potential Priority Routes



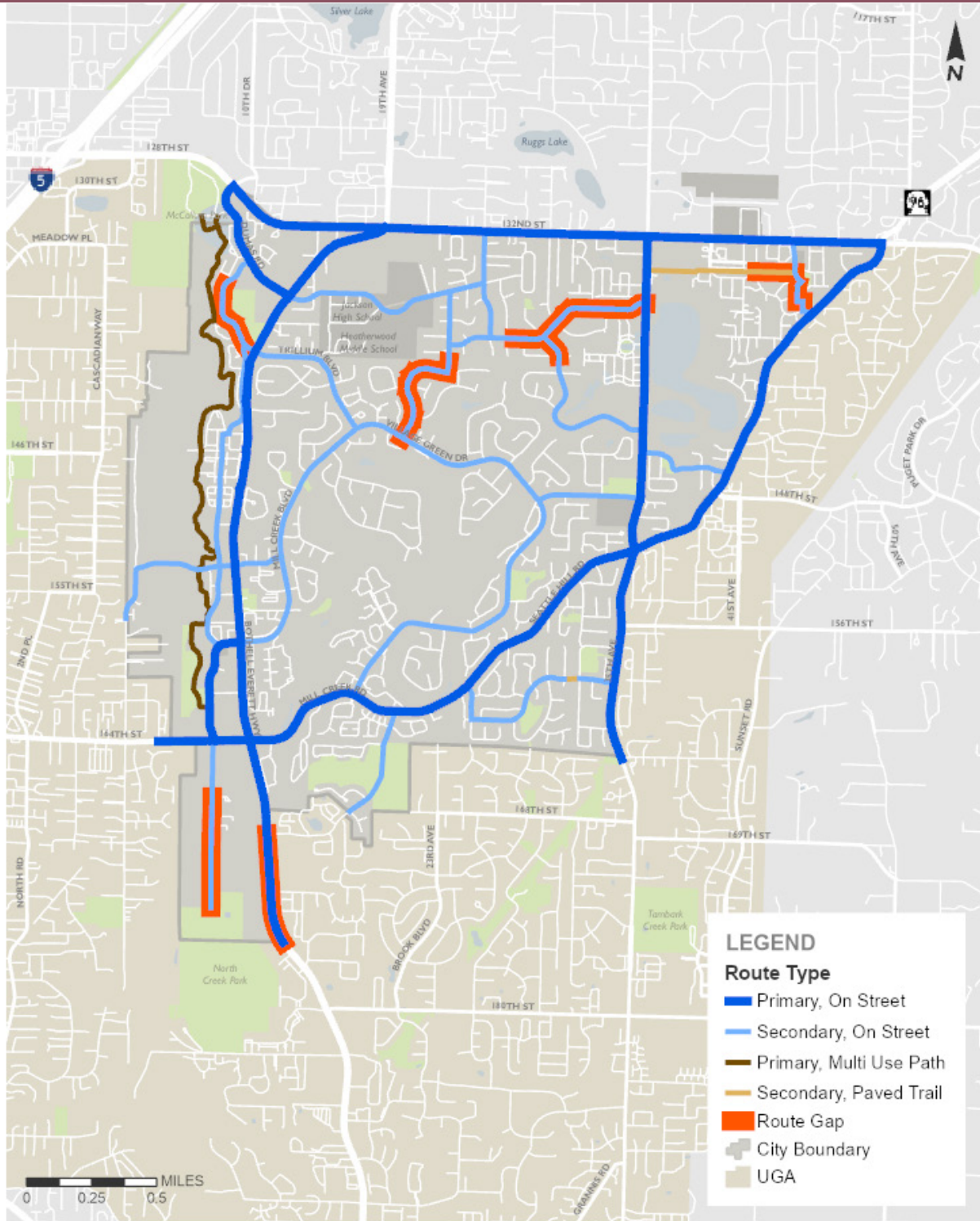
**Pedestrian and Bicycle Potential Priority Routes**

Mill Creek Comprehensive Plan



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FIGURE 05. Pedestrian Priority Route Gaps



## Pedestrian Priority Route Gaps

Mill Creek Comprehensive Plan



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## **1. PEDESTRIAN FACILITIES SYSTEM INVENTORY:**

In addition, public access easements have been secured on privately owned and maintained pedestrian facilities within several residential neighborhoods. These private facilities are open to the public and provide convenient connections that reduce the travel time and distance for people walking. There are also extensive networks of private pedestrian facilities within Mill Creek that are owned and maintained by homeowner associations.

## **2. ADEQUACY OF EXISTING PEDESTRIAN FACILITIES SYSTEM:**

The adequacy of the pedestrian facilities system can be measured by comparing the inventory of facilities with the adopted Level of Service Standards and Guidelines.

## **3. LEVEL OF SERVICE STANDARDS AND GUIDELINES FOR PEDESTRIAN FACILITIES:**

The following Level of Service Standards are established for the city's pedestrian facilities:

- » All new or upgraded public streets shall have pedestrian facilities on both sides and convenient opportunities to safely cross these streets in accordance with City design guidelines and construction standards.
- » All pedestrian facilities shall comply with the Federal Americans with Disabilities Act (ADA) requirements.

The following Level of Service Guidelines are established for the city's pedestrian facilities:

- » All collector and arterial streets should have pedestrian facilities along both sides and convenient opportunities to safely cross these streets.
- » Pedestrian facilities should be transit oriented to encourage alternate modes of transportation and include conveniently accessible bus stops.
- » Existing residential streets should have pedestrian facilities, with the type of facility provided depending on traffic volumes and speeds.

## **4. FINDING:**

The city's pedestrian facilities system has been evaluated in relationship to the Level of Service Guidelines and is generally in compliance. As new developments occur, pedestrian facilities will be constructed to meet the Level of Service Standards.

Existing pedestrian facilities that do not meet current ADA standards will be retrofitted to the maximum extent feasible in accordance with the policies, standards and criteria established in the latest version of the City's ADA Transition Plan.

# Multiuse Path System

## 1. MULTIUSE PATH SYSTEM INVENTORY:

Multiuse paths differ from pedestrian facilities in that they are not usually within the public right-of-way and are intended to be used by both people walking and biking. In addition, they act as active transportation corridors connecting users to destinations such as parks, mixed-use and commercial developments, and residential areas.

The North Creek Trail is part of a coordinated regional system that will ultimately connect facilities between Snohomish and King Counties. A majority of the multiuse path in Mill Creek has been completed between the McCollum Park park & ride facility on 128th Street SE and the Penny Creek crossing on 9th Avenue SE. Portions of the multiuse path utilize sidewalks where the adjacent property was developed and easements were not practical. However, the City plans to conduct a study to identify further improvements to the City's portion of the North Creek Trail that can be implemented to accommodate safe and efficient access for people walking and biking along this corridor.

In addition, a portion of a paved trail has been constructed east of 35th Avenue SE to connect communities within the East Gateway Urban Village. The City plans to further extend this paved trail east to 44th Avenue SE utilizing available easement opportunities.

There are also extensive paved trail systems within the city that are owned and maintained by homeowner associations.

## 2. CAPACITY OF EXISTING MULTIUSE PATH SYSTEM:

The capacity of the city multiuse path system can be measured by comparing the inventory of facilities with the adopted Level of Service Guidelines.

## 3. LEVEL OF SERVICE STANDARDS AND GUIDELINES FOR MULTIUSE PATH FACILITIES:

The following Level of Service Standards are established for the city's multiuse path facilities:

- » Multiuse paths shall connect public pedestrian facilities, bicycle facilities, parks and other public areas such as mixed-use centers.
- » All multiuse paths shall comply with the Federal Americans with Disabilities Act (ADA).
- » Multiuse paths shall be designed to accommodate people walking and biking.

The following Level of Service Guidelines are established for the city's multiuse path facilities:

- » Multiuse paths should connect between neighborhoods.
- » Multiuse paths should be located within major open space corridors.

## 4. FINDING:

The city's multiuse path system has been evaluated in relationship to the Level of Service Guidelines and is generally in compliance. As new developments occur, consideration will be given to construct multiuse paths to link between existing pedestrian and bicycle facilities.

Existing multiuse paths that do not meet current ADA standards will be retrofitted to the maximum extent feasible in accordance with the policies, standards and criteria established in the latest version of the City's ADA Transition Plan.

# Bicycle Facilities System

## 1. BICYCLE FACILITIES SYSTEM INVENTORY:

Encouraging bicycling can help alleviate traffic congestion and promote health and sustainability. Designated bicycle facilities typically narrow the travel lanes to create a traffic calming effect that is intended to slow vehicles. Additional signage and pavement markings can alert drivers to the presence of bicycles and help share the road.

There are approximately 5.2 lane miles of striped bicycle lanes on city arterials with another 9.2 lane miles on state highways. In addition, there are approximately 13 miles of widened paved road sections on collector roadways. No residential or local bicycle facilities have been included in this inventory.

A map of existing bicycle facilities in Mill Creek is shown on the Existing Bicycle Facilities Map.

## 2. CAPACITY OF THE EXISTING BICYCLE FACILITIES SYSTEM:

The capacity of the bicycle facilities system can be measured by comparing the inventory of facilities with the adopted Level of Service Guidelines.

## 3. LEVEL OF SERVICE GUIDELINES FOR BICYCLE FACILITIES:

The following Level of Service Guidelines are established for the city's bicycle facilities:

- » Designated bicycle facilities should be located along all state highways, arterials and collectors.
- » Bicycle facilities should be provided where possible to interconnect with adjoining jurisdictions' bicycle facilities.

## 4. FINDING:

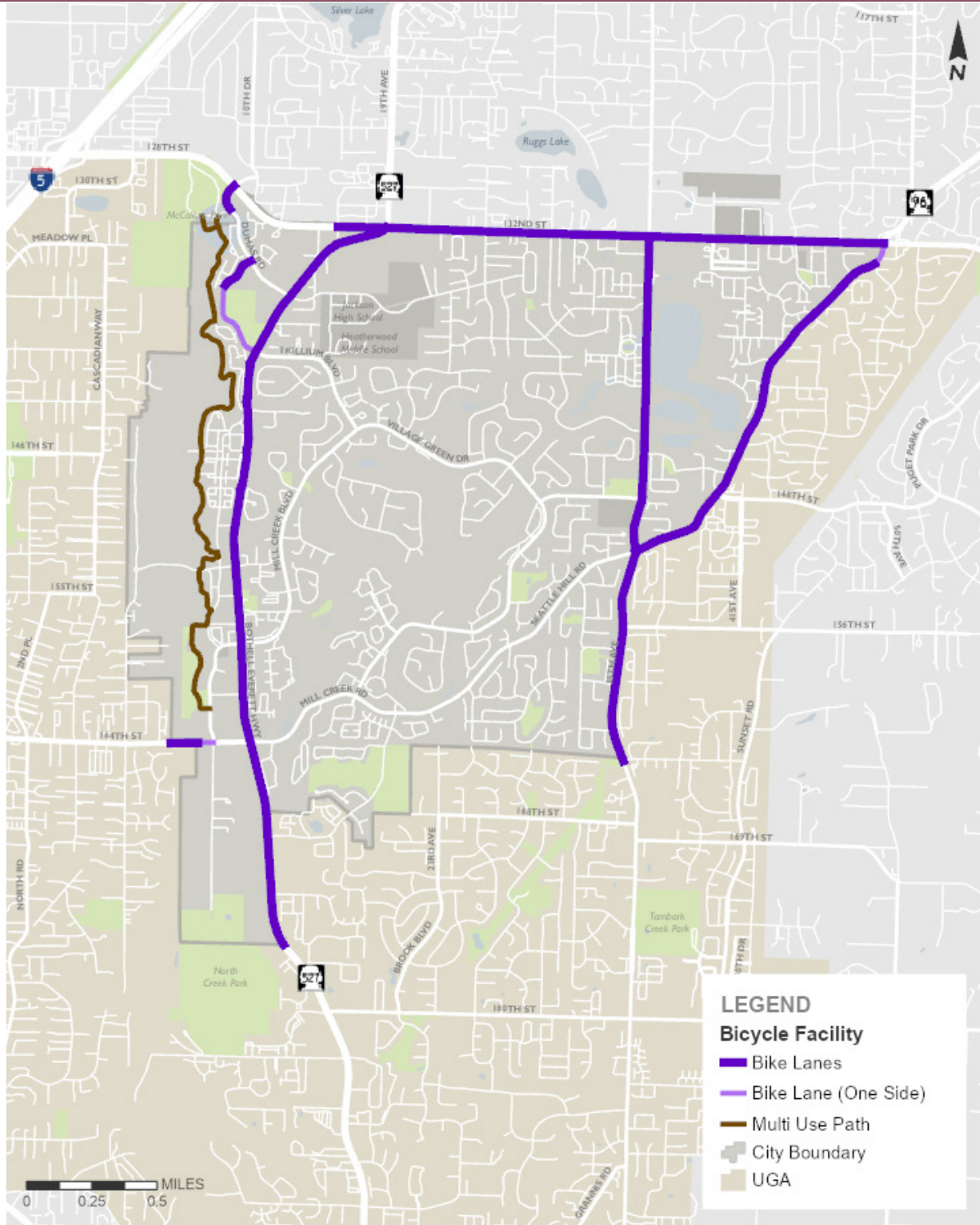
Existing bicycle facilities on state highways and arterial streets are generally adequate to meet the established Level of Service Guidelines. Areas where the LOS is not met are constrained by available roadway right-of-way.

However, no collector roadways currently meet the LOS Guidelines, but instead have wider travel lanes for shared use. On most collector roadways, there is adequate room to include a striped bicycle lane for a portion of the street segment.

As a potential next step, the City could consider developing an active transportation plan to identify specific improvements needed along bicycle priority route segments to make bicycling safer and more comfortable for all ages and abilities.



FIGURE 06. Existing Bike Facilities



## Existing Bicycle Facilities

Mill Creek Comprehensive Plan



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# Transit System

## 1. TRANSIT SYSTEM INVENTORY:

The City does not own or operate any transit facilities. Community Transit (CT) provides local and commuter bus service in Snohomish County, while Sound Transit provides regional bus and rail services between King, Pierce, and Snohomish counties. Everett Transit provides connecting service to the City of Everett system.

Nearly 75% of the City's population is within 1/4 mile of transit service, and the City has approximately 65 bus stop pads located on arterials and collector roadways. As of June 2024, CT operates two bus rapid transit routes, four core service routes, and four commuter service routes within Mill Creek. The existing transit system is shown below on the Transit Service and Facilities Map.

These service routes connect to several other transit routes at the park & ride lots at McCollum Park at 128th Street SE and Ash Way at 164th Street SW (potentially adjacent to or near the future site of a Link Light Rail station). In addition to the two local park & rides, there are several park & pool facilities at private parking lots within the MUGA.

CT also provides Dart paratransit, commute trip reduction, ride matching and van pool services. Since transit routes and schedules are subject to change to meet demand, as well as being out of the City's jurisdiction, detailed information regarding specific routes is not included in this element.

## 2. CAPACITY OF THE EXISTING TRANSIT SYSTEM:

The capacity of the transit system can be measured by comparing the existing service with the adopted Level of Service Standards and Guidelines.

## 3. LEVEL OF SERVICE STANDARDS AND GUIDELINES FOR TRANSIT SERVICE:

The following Level of Service Standards are established for transit areas:

- » Bus stop pads shall be provided for people taking transit at designated locations that are safe for both people walking and driving.
- » Pedestrian facilities shall be provided for easy and safe access to all transit bus stops.
- » All bus stop pads and connecting pedestrian facilities shall comply with the Federal Americans with Disabilities Act (ADA).

The following Level of Service Guidelines are established for transit areas:

- » New development should be designed to be transit oriented. Examples of transit-oriented design features include reduced parking requirements, designated carpool and vanpool parking, bike racks or lockers, and bus stop pads with shelters.
- » The City should coordinate with transit agencies on both land development and capital improvement projects to provide new service and facilities.

## 4. FINDING:

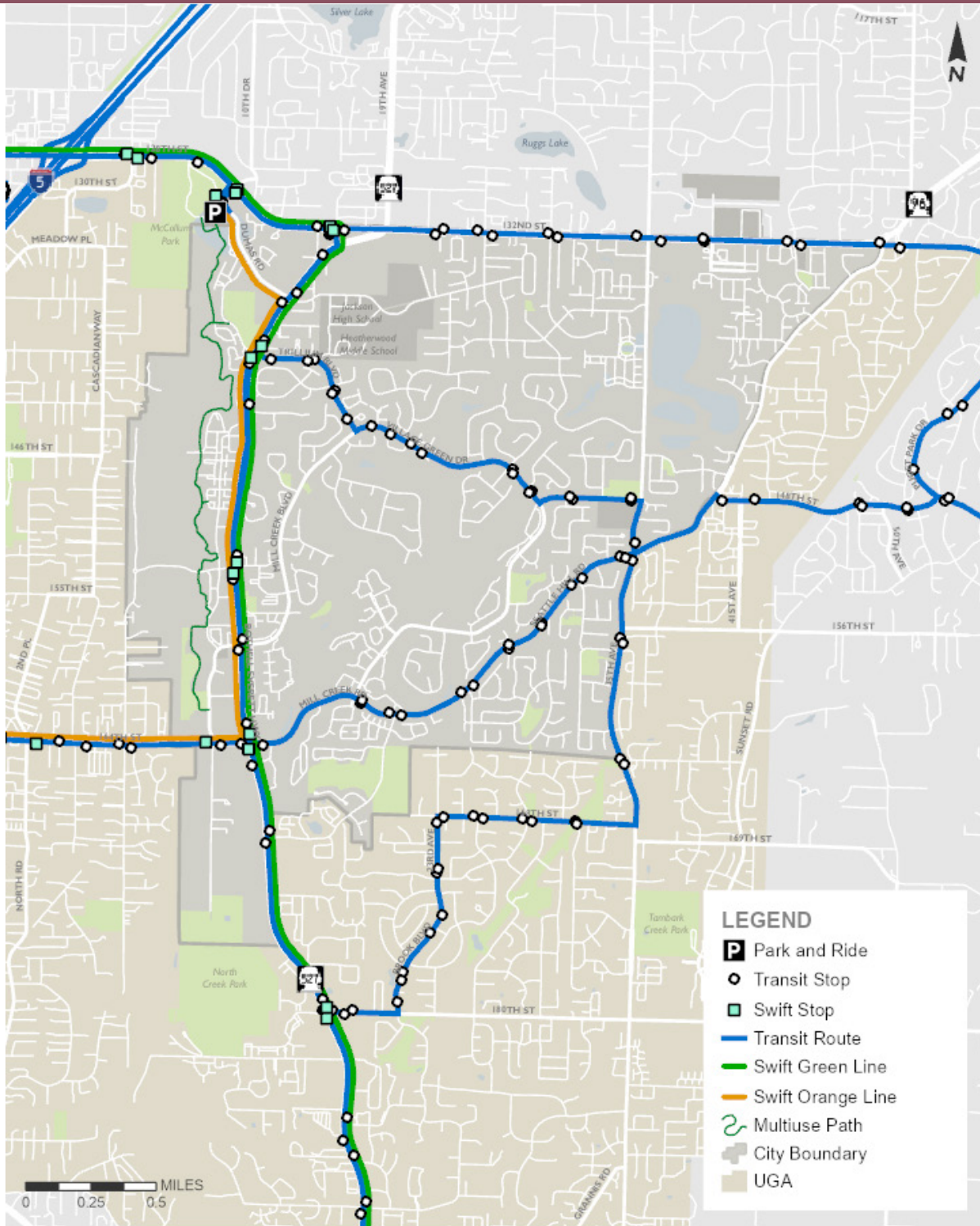
Bus stops are located along the state highways and the city's arterial and collector streets, and generally meet the adopted Level of Service Standards and Guidelines.

Existing bus stops that do not meet current ADA standards will be retrofitted to the maximum extent feasible in accordance with the policies, standards and criteria established in the latest version of the City's ADA Transition Plan.

However, due to the increase in traffic congestion resulting from trips originating from both inside and outside the city and the investment in new Swift BRT service along major arterials, new development and redevelopment projects should be designed to encourage the use of public transit facilities.



FIGURE 07. Transit Service and Facilities



**Transit Service and Facilities**  
 Mill Creek Comprehensive Plan



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# Future Needs for New and/or Expanded Facilities

**Based on the findings of the Inventory and Capacity Analysis section, this section discusses the transportation facilities needed to maintain and/or meet the adopted Level of Service Standards and Guidelines over time.**

## Street System

From a regional standpoint, the PSRC has adopted the Regional Transportation Plan 2022-2050 plan to address growth over the next 30 years. While there are still capacity projects planned for major corridors in the region, much of the focus has shifted to encouraging other modes of travel such as transit, walking, and biking.

As previously shown in Table 2, one intersection on the RSSH is currently below the minimum Level of Service Guidelines and is projected to continue to be below the minimum Level of Service Guidelines in 2044.

Additional capital improvement projects will be needed in the future to maintain the minimum established Levels of Service, as well as improve operations and safety. Future capital projects for intersection and roadway improvements should emphasize functional value and can be considered during the biennial update to the six-year CIP. Projects will be designed to accommodate freight and goods movement, especially along the RSSH and the city's designated truck routes.

On the following page is a summary table of potential improvement projects, studies, and programs that could be implemented to enhance the accessibility and safety of the transportation system. It should be noted that the estimated costs are only conceptual, and additional evaluation should be performed for some projects to better define the scope of the improvements, costs, and benefits. This table incorporates the projects identified in the latest six-year CIP and long-term projects to accommodate the planned growth in the City over the next 20 years.

Project TE-1, and shown in Table 3, would support the planned growth in South Town Center. This area is planned to be mixed-use and walkable in its design and these identified transportation improvements would help make walking, biking, rolling, and taking transit safe and convenient options. Further details of the siting and specific features included in these projects will be identified as part of future potential development agreements and environmental documents.



TABLE 03.

## Potential Improvement Projects, Studies, and Programs

PROJECT / LOCATION	PROPOSED MODIFICATIONS	ESTIMATED 2024 COST
<b>ROADWAY IMPROVEMENTS</b>		
<b>TE-1</b> <b>Mill Creek Blvd Master Transportation Upgrade</b>	Construct new complete streets features within South Town Center, such as narrow travel lanes, chicanes, wide sidewalks, pedestrian-only streets, and enhanced landscaping.	\$9,400,00 2025-2030 CIP Estimate
<b>TE-2</b> <b>164th Street at Mill Creek Blvd Bus Rapid Transit Improvements</b>	Construct business access and transit (BAT) lane and frontage improvements along eastbound approach.	Snohomish County Project
<b>TE-3</b> <b>State Highway Intersection Improvements</b>	Revise signal timing and phasing control to provide protected left turns to improve crosswalk safety at SR 527 intersections with 153rd Street, Trillium Boulevard, and Dumas Road and SR 96 intersection with 39th Avenue. Also, explore potential signal or roundabout control for the SR 527 intersection with Old Seattle Hill Road.	Potential WSDOT Projects <sup>1</sup>
<b>ACTIVE TRANSPORTATION - ON STREET</b>		
<b>TE-4</b> <b>Trillium Blvd Reconstruction</b>	Construct new complete streets features such as enhanced bicycle and pedestrian facilities, narrow travel lanes, and storm drainage upgrades on Trillium Boulevard between SR 527 and Village Green Drive.	\$3,080,000 2025-2030 CIP Estimate
<b>TE-5</b> <b>Mill Creek Elementary/ Heatherwood School Crosswalk Improvements</b>	Install, move, and replace solar-powered Rectangular Rapid Flashing Beacons (RRFBs) at crosswalks near Mill Creek Elementary and Heatherwood Middle School.	\$120,000 2025-2030 CIP Estimate
<b>TE-6</b> <b>35th Avenue New Crosswalk</b>	Install high visibility crosswalk to address gap between SR 96 and 148th Street.	\$194,000 2025-2030 CIP Estimate
<b>TE-7</b> <b>Silver Crest Drive Reconstruction</b>	Construct new sidewalks, bike lanes, and storm drainage improvements on the south side of Silver Crest Drive between 35th Avenue, 33rd Drive and 26th Avenue.	\$4,150,000 2025-2030 CIP Estimate

TABLE 03.

**Potential Improvement Projects, Studies, and Programs Cont.**

<b>PROJECT / LOCATION</b>	<b>PROPOSED MODIFICATIONS</b>	<b>ESTIMATED 2024 COST</b>
<b>ACTIVE TRANSPORTATION – ON STREET Continued</b>		
<b>TE-8 North Creek Drive Pedestrian Improvements</b>	Construct new sidewalk on both sides of North Creek Drive between the Heatherwood Apartments area and the Mill Creek Sports Park/Freedom Field.	\$2,100,000 2023-2028 CIP Estimate
<b>TE-9 Old Seattle Hill Rd Reconstruction</b>	Construct new sidewalks, bike lanes, and storm drainage improvements on Old Seattle Hill Road between Mill Creek Road and the south city limits.	\$2,400,000 2025-2030 CIP Estimate
<b>TE-10 Mill Creek Boulevard/ Village Green Drive Complete Streets Improvements</b>	Install complete streets features such as bicycle lanes, pedestrian-scale lighting, and closing sidewalk gaps between SR 527 and Mill Creek Road.	\$6,833,000
<b>TE-11 Mill Creek Road/Seattle Hill Road Complete Streets Improvements</b>	Install complete streets features such as enhanced bicycle lanes, pedestrian-scale lighting, and closing sidewalk gaps between SR 527 and 35th Avenue. res such as retractable bollards and space for civic plazas.	\$3,543,000
<b>TE-12 Dumas Road Reconstruction</b>	Construct new sidewalks, bike lanes, and storm drainage improvements on Dumas Road between SR 96 and SR 527.	\$4,000,000 2025-2030 CIP Estimate
<b>TE-13 SR 96 New Crosswalk</b>	Install high visibility crosswalk to address gap between 25th Avenue and 35th Avenue.	\$1,038,000
<b>TE-14 SR 527 Sidewalk Gap Closure</b>	Construct new sidewalk on both sides of SR 527 between (Old) Seattle Hill Road and southern city boundary.	\$2,297,000
<b>ACTIVE TRANSPORTATION – OFF STREET</b>		
<b>TE-15 133rd Street Right-of-Way Extension Improvements</b>	Construct a paved trail connection between 41st Avenue and 44th Avenue.	\$1,678,000 2025-2030 CIP Estimate

<sup>1</sup> Intersections on state highways are within WSDOT's jurisdiction and concepts, designs, and cost estimates for projects would need to be developed and approved by WSDOT. These improvements are identified as potential collaborative projects between Mill Creek, its neighboring jurisdictions, and WSDOT.

## Pavement Management System

The key to successful pavement management is using the right technique on the right road at the right time. There are many options available, or “tools in the toolbox”, to proactively maintain the City’s roadway surfaces in good condition. These include preventative maintenance treatments such as crack sealing, spot repairs, surface preservation treatments like slurry seals, structural overlays, and full depth replacement.

The City maintains an ongoing Pavement Preservation Program (PPP). The PPP is frequently updated based on condition surveys, citizen and Council input, and availability of successful preservation methods. While short- and long-term paving plans may be flexible, the long-term average budgeted cost to maintain the city’s roadways in good condition is between \$1 to \$2 million per year.

## Pedestrian Facilities System

The existing pedestrian facilities system is generally adequate to meet the established Level of Service Guidelines for state highways, as well as most City arterial and collector streets. However, pedestrian facilities are missing from many older residential areas, as well as the following major roadways and school routes. Missing pedestrian facilities have been prioritized for improvement as identified in the long-range project list shown in Table 3 focusing on addressing gaps within the city’s existing pedestrian priority route system.

### Primary priority route gaps addressed in the long-range project list:

- » SR 527 – both sides from (Old) Seattle Hill Road to southern city limits
- » Mill Creek Road – south side between SR 527 and 15th Drive SE

- » Mill Creek Boulevard – east side between 164th Street SE and 161st Street SE

### Secondary priority route gaps addressed in the long-range project list:

- » Village Green Drive – north side between 20th Drive SE and the 2400 block
- » Village Green Drive – north / west side between 28th Drive SE and Country Club Dr
- » North Creek Drive – both sides along the four City / WSDOT owned properties
- » Silver Crest Drive – both sides between 27th Drive SE and 35th Avenue SE
- » (Old) Seattle Hill Road – south side between 163rd Street SE and the city limits

### Capital projects to address the following additional pedestrian facility gaps should be considered as part of the biennial update to the six-year CIP:

- » SR 96 – north side between Dumas Road and 16th Avenue SE
- » North Creek Drive – east / south side between 145th Street SE and Trillium Blvd
- » 136th Street SE – north side between 14th Drive SE and the 1900 block
- » 136th Street SE – south side between 25th Avenue SE and the 2400 block
- » 25th Avenue SE – east side between SR 96 and 136th Street SE
- » 25th Avenue SE – west side between 136th Street SE and 139th Street SE
- » 139th Street SE – north side between 25th Avenue SE and mid-2600 block
- » 139th Street SE – both sides between mid-2600 block and 27th Drive SE
- » 28th Drive SE – both sides between Silver Crest Drive and 140th Place SE

## Multiuse Path System

A majority of the North Creek Trail has been completed within the city limits. Until the multiuse path is completed between the Penny Creek crossing on 9th Avenue SE and North Creek Park, the low traffic volume allows the multiuse path function to be met by sharing the existing paved roadway area. Capital projects to complete the North Creek Trail along 9th Avenue SE and the missing segment between the North Creek Trail Pond and 164th Street SE should be considered during the biennial update to the six-year CIP. The latest CIP includes a project to complete the paved trail connecting through the East Gateway Urban Village.

## Bicycle Facilities System

The existing bicycle facilities are generally adequate to meet the established Level of Service Guidelines for state highways and arterial streets. However, designated bicycle facilities are missing from the following major roadways and school routes. Missing bicycle facilities have been prioritized for improvement as identified in the long-range project list shown in Table 3 focusing on the city's bicycle potential priority route system.

### Primary priority route segments addressed in the long-range project list:

- » Mill Creek Road between SR 527 and Village Green Drive

### Secondary priority route segments addressed in the long-range project list:

- » Mill Creek Boulevard and Village Green Drive between SR 527 and Mill Creek Road

### Capital projects to address the following additional bicycle facility segments should be considered as part of the biennial update to the six-year CIP:

- » 164th Street SE between Mill Creek Boulevard and SR 527
- » SR 96 between Dumas Road and SR 527
- » 148th Street SE between Village Green Drive and 35th Avenue SE
- » 136th Street SE between SR 527 and 25th Avenue SE
- » 25th Avenue SE between SR 96 and 139th Street SE
- » 139th Street SE / Silver Crest Drive between 25th Avenue SE and 35th Avenue SE



## Transit System

The Regional Transportation Plan 2022-2050, updated by PSRC in May 2022, is a transportation action plan for King, Pierce, Snohomish and Kitsap counties. This plan identifies service and facility improvements for the entire region, many of which will occur in south Snohomish County and benefit Mill Creek. Community Transit is also required to annually adopt a six-year transit development plan and approved an update to its long-range transit plan in 2023. As Community Transit's long-range service and capital vision, the long-range transit plan describes how Community Transit will work toward a regional, innovative, and integrated mobility network that is safe, equitable, and sustainable. The system will support healthy communities, a thriving economy, and will protect environmental integrity.

Some of the significant regional transit projects include expanded commuter and local bus service, implementation of additional bus rapid transit (BRT) service along the SR 96 corridor, and the completion of the Sound Transit Link Light Rail system between Lynnwood and the City of Everett.

To support future development activity, the City encourages Community Transit and Sound Transit to implement the recommendations in the long range transit plan to improve coverage, and accessibility and increase service frequency, especially on the weekends. Increased service frequency, coverage, and accessibility is desired by the City to make transit use more convenient and to meet growing local travel demands.

## Transportation Demand Management

In addition to potential future increases in transit service, transportation demand management (TDM) programs can support the mobility needs of the community. TDM programs target ways to improve access other than through building new roadway capacity. These programs should be coordinated with Community Transit (aligning with their Commute Trip Reduction program), Snohomish County, and PSRC to provide a broader basis for reducing single-occupant vehicle travel and expanding transportation choices.

Mill Creek is a growing community with increased levels of urban development, especially in the Mill Creek Boulevard Subarea and East Gateway Urban Village areas. TDM strategies are typically most effective in denser and larger urban settings. However, TDM program strategies coordinated with regional agencies can provide more transportation options for residents and employees within Mill Creek.

The Washington Commute Trip Reduction Law (RCW 70.94.521) requires TDM performance targets for firms with over 100 employees. Employers in Mill Creek with over 100 employees must comply with these state requirements and implement a Commute Trip Reduction program. Other potential TDM strategies for the City of Mill Creek to encourage or require for employers and new developments include the following options:

## Flexible/Alternative Work Schedules

Flexible work schedules allow employees to adjust start/end times to reduce the number of days an employee commutes to work or avoid peak travel periods. These programs help reduce the need for adding capacity to highways and arterials and reduce the levels of peak hour congestion.

## Telecommuting

The use of telecommunications technology can allow some employees to work from home. This reduces the number of days employees need for travel to/from a work site.

## Site and Street Design

Sidewalks and/or other hard surface pathways that connect a development to adjacent pedestrian and bicycle facilities shall be provided by new developments when feasible. Pathways should incorporate pedestrian scale lighting and provide reasonably direct pedestrian access between arterials or collectors and existing or future transit stops, especially the emerging Swift BRT network. Transit shelters should be considered along arterial streets where the number of transit riders or service frequency warrants them.

## Market Transit Services and Opportunities

Partner with Community Transit to promote and potentially provide transit service options at public events and through marketing channels. Inform managers of multifamily communities and businesses of bulk transit pass programs available.

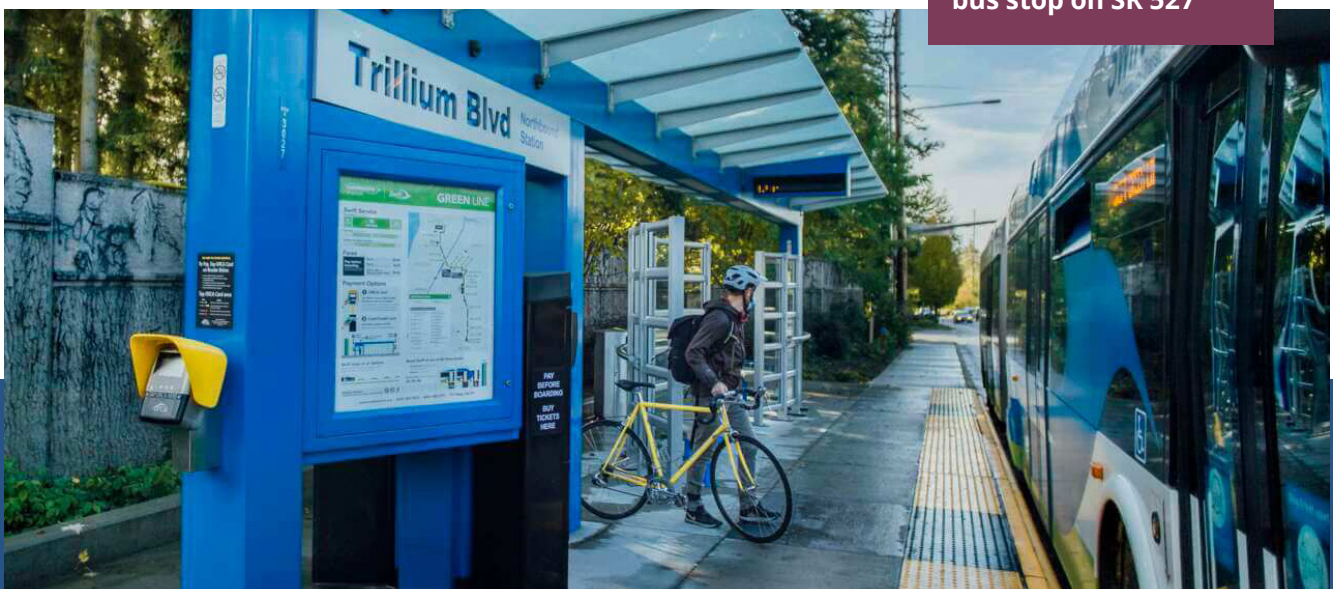
## Commute Expenses

Adopt an ordinance requiring businesses to offer employees pre-tax transit passes, or other commute expenses such as vanpool or rideshare.

## TDM In-Lieu Fee Program

Require developers to create and implement a TDM plan for new developments or contribute an in-lieu payment to the city to fund citywide TDM projects.

Community Transit bus stop on SR 527





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# Waterborne, Rail, and Air Transportation

There are no airports in the immediate Mill Creek planning area. Regional, national, and international air travel for Mill Creek is provided via Seattle-Tacoma International Airport, located approximately 35 miles south of Mill Creek. Additional regional and national air travel is provided by Everett's Paine Field Airport located approximately 5 miles northwest of Mill Creek.

There are no rail or waterborne transportation systems serving Mill Creek. The Transportation element does not identify rail or waterborne transportation as a component of the city's transportation system.

## Funding Capability

**In general, capital improvement projects can be financed through real estate excise tax (REET), property tax, mitigation fees, surface water fees, gas tax, grants, bonds and private developer construction. City transportation projects are typically funded with traffic mitigation fees and REET, along with some grants and loans.**

In addition to Mill Creek's capability to generate revenue, budget constraints at the state and federal level may also impact the City's ability to construct planned capital improvements. As financing options become more limited, the City will have to prioritize capital improvement projects through the biennial CIP process.

The scope of ongoing scalable projects, such as the Pavement Preservation Plan, can be adjusted to fit the available funding. However, deferring maintenance or capital projects will usually result in higher long-term costs. Additional sources of dedicated revenue could also be pursued, such as a transportation benefit district.

To address the traffic impacts from development, the City has implemented a traffic mitigation program that requires a fee to be paid for each new PM Peak Hour trip. The City also has an Interlocal Agreement with Snohomish County to collect mitigation fees from County developments in the surrounding area that impact city streets. The money collected with the city and County traffic mitigation programs is used to fund various projects that will improve the capacity and safety of the roadway network.

# Multiyear Financing Plan

All transportation projects that require funding through the City are identified in Mill Creek’s Capital Improvement Program (CIP), as well as the Transportation Improvement Program (TIP). The City updates and adopts the CIP and TIP every two years prior to the biennial budget process.

## Six-Year Transportation Improvement Program (TIP)

The TIP is a mandatory transportation project planning document prepared by the City and used by the State and the Metropolitan Planning Organization (MPO) in estimating the region's state and federal transportation funding needs. The designated MPO for Mill Creek is the Puget Sound Regional Council (PSRC).

PSRC is charged with evaluating transportation projects with established criteria, assisting in the coordination of transportation projects between jurisdictions, projecting long-range transportation financing needs and distributing state and federal funds. For a City transportation project to be eligible for federal and/or state funding, it must be included in the six-year TIP.

## Six-Year Capital Improvement Plan (CIP)

The CIP is the financial tool used to identify all capital improvement projects planned by the City within the next six years. All transportation projects, as well as parks, stormwater, and City facility projects, are included in the six-year CIP. In addition to identifying the projects and their estimated cost, the funding source must be identified. Project costs cannot exceed the resources available to fund the projects.

The current CIP is adopted as part of the Transportation element by reference.

Although the TIP and CIP identify anticipated funding sources, some of these funding sources are subject to competitive processes and are dependent upon circumstances out of the City's control. In the event of a shortfall in the revenues necessary to maintain the established LOS Standards, the City will be required to consider some combination of the following alternatives:

- » Reevaluate the land use designations within the Land Use element to determine if changes are necessary to meet the Level of Service Standards.
- » Reevaluate the established Level of Service Standards to determine if they are feasible and realistic.
- » Consider other methods of funding such as a new local improvement or transportation benefit district (LID or TBD), a street levy or councilmanic bond, or reassigning funds from a lower priority project.
- » Explore other methods to meet the Level of Service Standards other than a capital improvement project. This could include coordinating with transit agencies for additional service, partnering with other agencies to use Intelligent Transportation Systems technology, or implementing new Transportation Demand Management strategies.

# Intergovernmental Coordination

Mill Creek has two state highways within the city limits, specifically SR 96 and SR 527. In accordance with the adopted April 2013 guideline “City Streets as Part of State Highways,” WSDOT has jurisdiction over the roadway components between the curbs, including the operation and maintenance of all traffic signals, channelization (striping) and pavement repairs. The City has jurisdiction over the portion of the right-of-way behind the curb, as well as franchise and utility permitting. However, the City is also responsible for landscaping and drainage maintenance, as well as snow and ice control.

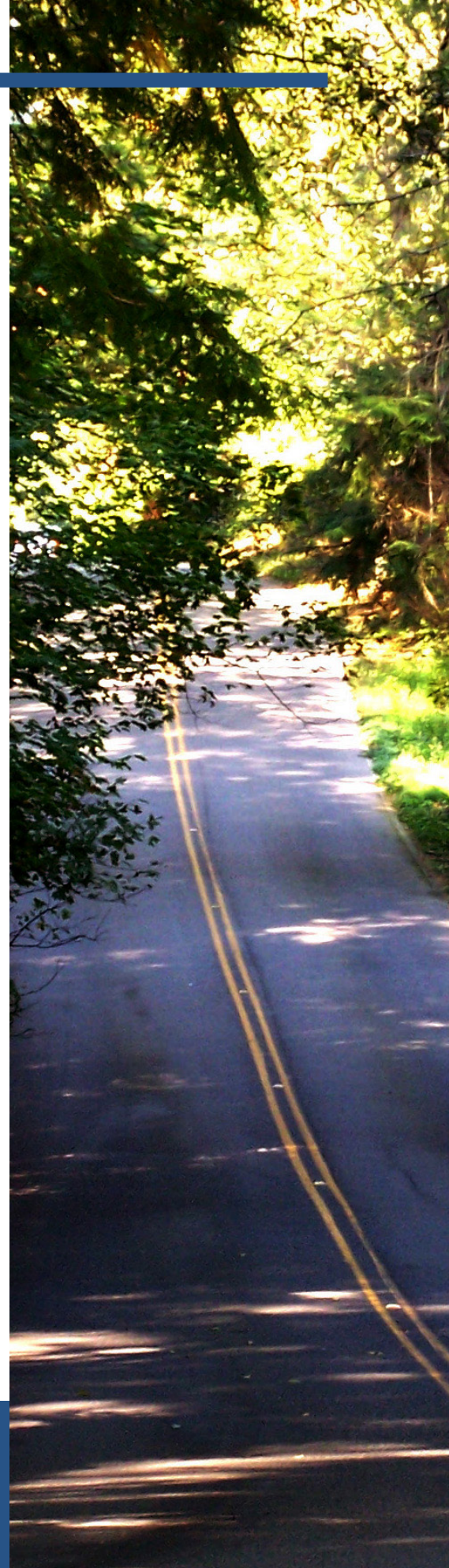
Outside the state highways and city limits, the roadway network surrounding Mill Creek is within unincorporated Snohomish County. The County also operates and maintains the City’s six traffic signals and provides roadway maintenance services such as annual roadway restriping and pavement repairs / preservation work.

The City maintains a good working relationship with Community Transit, WSDOT, and County staff. Mill Creek solicits comments from outside agencies for private land development applications as part of the Technical Review Committee process. On the reciprocal side, County development projects within a defined impact area are sent to City staff for comments as well.

For example, on a private land development project with frontage on a state highway or County road, the City would approve the number and location of access point(s), and WSDOT or the County would approve how it operates, such as right-in, right-out or full turn movements. Any new traffic signals or intersection improvements proposed on a state highway would have to meet WSDOT design criteria and warrants.

Agency personnel also frequently coordinate and partner on capital projects that cross jurisdictional lines or could impact the surrounding roadway network. Examples include the proposed 164th Street SE business access and transit lanes project, intersection improvements on state highways, and pavement preservation work.

Several Interlocal Agreements either already exist for maintenance mutual aid, land development review and capital project coordination, or can be approved as needed.





# UTILITIES

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## Introduction

**This element has been developed to identify and address the provision of utility services within the City of Mill Creek. The Utilities element is consistent with the Land Use element as it confirms that adequate utility facilities are or will be available to support the land uses envisioned for Mill Creek through 2044.**

In addition, the Utilities element is consistent with the Countywide Planning Policies (CPPs) adopted by Snohomish County.

This element contains:

- » An inventory and capacity analysis of existing utility facilities;
- » An assessment of the need for new and/or expanded utilities to serve growth in the existing City as anticipated in the Land Use Element; and

- » Policies to ensure the timely and efficient provision and maintenance of utility facilities.

Snohomish County is tasked with Comprehensive Planning within Mill Creek’s Municipal Urban Growth Area (MUGA) outside of present city limits until such time as Mill Creek might choose to annex any or all of that area. Utility capacity for the growth planned by the County is part of their Comprehensive Planning; that data would be “inherited” and included in revised Mill Creek Comprehensive Plans after any such annexation.

## Definition of Utilities

The procedural criteria prepared by the state to guide cities in the implementation of the Growth Management Act (GMA) include the following recommended definition of utilities:

***“Utilities or public utilities mean enterprises or facilities serving the public by means of an integrated system of collection, transmission, distribution, and processing facilities through more or less permanent connections between the plant of the serving entity and the premises of the customer. Included are systems for the delivery of natural gas, electricity, telecommunications services, and water and for the disposal of sewage.”***



# UTILITIES

## GOALS AND POLICIES

### GOAL U-1

Coordinate with service providers to support planned growth, particularly in the South Town Center Subarea where growth is being targeted.



Coordination can take place through a State Environmental Policy Act (SEPA) determination review and comment process, interlocal agreement, or other formal processes.

#### POLICY U-1.1

Approve urban development only in those areas where services are or will be available and are adequate to support the proposed demands without adversely affecting current users.

#### POLICY U-1.2

Coordinate with other jurisdictions and utility providers to ensure there is adequate utility system capacity to serve the land uses envisioned and to identify areas where interjurisdictional cooperation is necessary.

#### POLICY U-1.3

Provide updates of population, employment, and development forecasts to the utility providers and adjacent jurisdictions to use in their long-range facility planning efforts or during plan updates.

## GOAL U-2

Through coordination with the utility providers and the application of appropriate development regulations, work to ensure that utilities are provided and maintained in a manner that is fiscally and environmentally responsible, aesthetically acceptable to the community, and does not pose an undo health risk or nuisance to those who live and work in the community.



### **POLICY U-2.1**

Process necessary permits and approvals in a fair and timely manner to ensure predictability in the installation of necessary utilities.

### **POLICY U-2.2**

Adopt and maintain development regulations that permit utility facilities in all appropriate zoning districts subject to appropriate public and City review (i.e., SEPA review and/or a Conditional Use Permit).

### **POLICY U-2.3**

Utility facilities designated as “essential public facilities” by the state, county, and/or Snohomish County Tomorrow are subject to the Conditional Use Permit process established in the Mill Creek Municipal Code.

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## **POLICY U-2.4**

Require development proponents to mitigate their proportional impacts on public utilities to ensure that proportional costs are borne by those responsible for the impact rather than the present City residents and rate payers, and that Levels of Service are not degraded below acceptable levels as a result of new developments.

## **POLICY U-2.5**

Where feasible, possible, and appropriate, require all new utility facilities to be located underground. In addition, require reasonable screening and/or the architecturally compatible design of all new above ground utility facilities. New above ground facilities shall obtain Design Review Board approval.

## **POLICY U-2.6**

To minimize construction-related disruptions to the public, reduce the cost of utility facilities, and prevent excessive deterioration of the roadway surface, promote, where possible, the co-location of new utility distribution and transmission facilities in shared trenches and the coordination of utility construction activity.

## **POLICY U-2.7**

Routinely cooperate with all utilities authorized to provide services within Mill Creek about the schedules for projects within the City's Capital Improvement Program that offer an opportunity to install infrastructure during the construction of City projects.

## **POLICY U-2.8**

Collaborate with service providers to locate customer services near transit, particularly bus rapid transit.



## GOAL U-3

Promote sustainable, affordable, and equitable access to utilities for all Mill Creek residences and businesses.



Internet is included in the term telecommunications throughout this plan.

### POLICY U-3.1

Encourage telecommunications service providers to engage in equitable long-term planning for telecommunications construction, reconstruction, and facility upgrades, including provisions to ensure that the systems' capacity, design, and equipment will allow users to take advantage of innovative uses, services, and technology.

### POLICY U-3.2

Consider climate change when siting utilities in Mill Creek and support efforts to increase the resilience of utilities.

### POLICY U-3.3

Promote demand management and conservation.

### POLICY U-3.4

Support renewable energy resources and investments in utility infrastructure to support facilities moving to low-carbon energy sources.

### POLICY U-3.5

Support the growth of Mill Creek resident- and business-owned distributed energy resources.

### POLICY U-3.6

Encourage electric vehicle infrastructure as a means of decarbonizing the transportation sector in Mill Creek.

## GOAL U-4

Implement and monitor Level of Service Standards and service providers' plans for utilities in Mill Creek and the MUGA.



### **POLICY U-4.1**

Pursuant to Title 57 RCW, review Alderwood Water & Wastewater District's (AWWD) and Silver Lake Water & Sewer District's (SLWSD) Plan Updates, which are required every six years, to ensure that the plans' land development patterns and population and employment assumptions are consistent with the policies and assumptions of the City's Comprehensive Plan.

### **POLICY U-4.2**

Continue to support and work with Alderwood Water & Wastewater District (AWWD) and Silver Lake Water & Sewer District (SLWSD) to provide Mill Creek residents, workers, and visitors with high quality drinking water.

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# UTILITIES SUPPORTING ANALYSIS

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## Inventory and Capacity Analysis

The inventory and capacity analysis presented in the Utilities element provides general information pertaining to the location and capacity of the existing utility service system in the city and the ability of the utility providers to serve the growth anticipated over the next 20 years.

### Electricity

Electric power is provided to the city and its MUGA by the **Snohomish County Public Utilities District No. 1 (PUD)**. The PUD is a component of the Northwest Regional Power Grid, which links regional electric generation facilities to individual utilities (such as the PUD) that distribute electricity to local communities.

#### 1. TRANSMISSION FACILITIES:

Electric power is supplied to Mill Creek and its MUGA through a network of substations tied together by 115,000 volt (115 kV) transmission lines. The Bonneville Power Administration's SnoKing substation, located southeast of the City's MUGA, is a major point of delivery to the PUD transmission system.

Two substations are located in Mill Creek. The North Creek substation is located in the City of Mill Creek on the southwest corner of the intersection of SR 527 and Mill Creek Boulevard, and is the primary source of electricity for Mill Creek. The Murphy's Corner substation is located on the southeast corner of SR 527 and SR 96.

**Puget Sound Energy (PSE)** also operates electrical transmission facilities located within a regional

utility corridor running north/south along the east side of the Mill Creek MUGA. Under certain conditions, PSE's transmission line supports the county's distribution grid by providing emergency back-up to Snohomish County PUD's system, but does not directly serve Mill Creek or the MUGA.

In order to serve the growing need for electricity in the area, it may be necessary to construct and/or purchase new generating resources. Depending on where these resources are located, additional transmission lines may be needed in order to transport the power to the loads (electric customers). These new lines would be located on existing transmission corridors whenever possible. However, additional new rights-of-way and substations may be developed if load growth or system reliability standards dictate the need.

# Utilities in Mill Creek

This section provides a summary of the location and capacity of the following types of utilities, provided by third-party service providers:

## Electricity

- » Snohomish County Public Utilities District No. 1 (PUD)

## Natural Gas

- » Puget Sound Energy (PSE)

## Water and Wastewater

- » Silver Lake Water and Sewer District
- » Alderwood Water & Wastewater District

## Telecommunication Services

- » Zply
- » Xfinity (Comcast)

## 2. DISTRIBUTION FACILITIES:

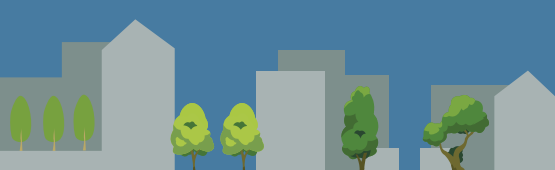
Distribution facilities deliver electricity from local substations to the customers. The PUD owns and operates all electric distribution facilities within the city of Mill Creek. These facilities are typically located in the public right-of-way or in adjacent utility easements. In the Mill Creek, much of the electrical distribution system is located underground. The under-grounding of utility facilities improves the aesthetics of the community and increases reliability.

Electrical utility capacity is mainly determined by the ability of the generation and transmission facilities to meet the demand generated by the distribution systems. Due to the common nature of electrical distribution facilities and frequent changes to provide new services, electrical distribution facilities are not mapped in the Utilities element.

## 3. CAPACITY OF ELECTRICAL UTILITY FACILITIES:

According to the 2021 Integrated Resource Plan (IRP) by Snohomish County PUD, there is adequate capacity and distribution capability to meet the current and future electrical demands of the land uses within Mill Creek and its MUGA, including the growth targeted for the South Town Center Subarea.

The IRP covers the 24-year planning horizon of 2022 through 2045. This planning horizon allows Snohomish County PUD the time to transition to 100 percent clean energy by 2045, as prescribed by Washington State's Clean Energy Transformation Act (CETA).



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## Natural Gas

**Puget Sound Energy (PSE)** is regulated by the Washington Utilities and Transportation Commission (UTC) to serve Snohomish, King, Pierce, Thurston, Lewis, and Kittitas counties. There are natural gas utility facilities located within the vicinity of the city and its MUGA.

Natural gas is supplied to the entire Puget Sound region from the Williams Northwest Pipeline. This transmission pipeline is a connecting link of an international natural gas pipeline network that connects natural gas sources from Canada and the southwest United States to individual natural gas distribution utilities throughout the Western United States.

District regulators reduce pressure for distribution within the City via gas distribution mains located in public rights-of-way. Currently within the city and its MUGA, PSE operates and maintains approximately 4 miles of high pressure main, 3 District Regulators, approximately 222 miles of main lines, and 197 miles of service lines. PSE has plans to replace aging distribution mains in several locations in the city in the next few years.

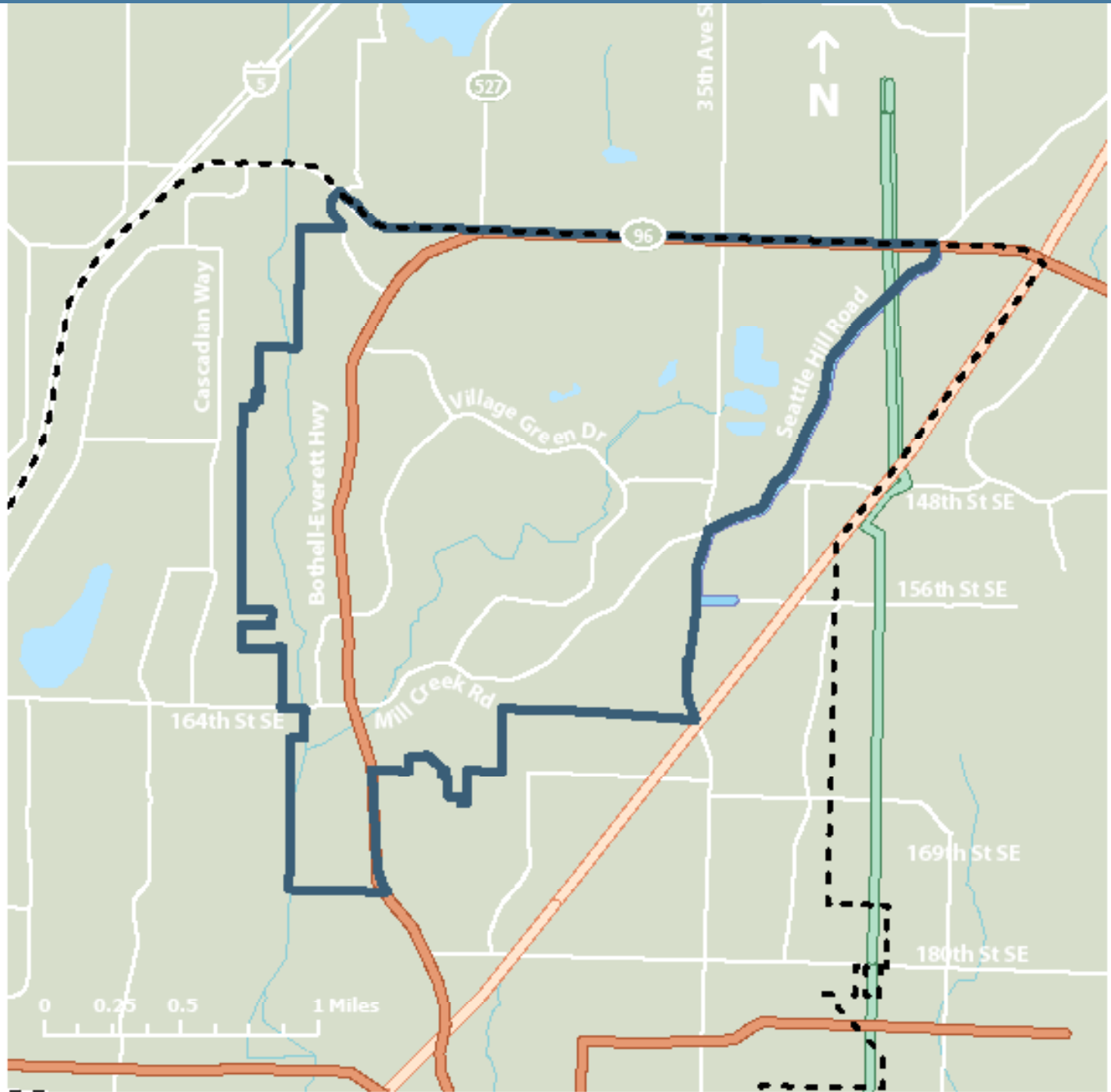
### **1. CAPACITY OF NATURAL GAS UTILITY FACILITIES:**

As shown in PSE's IRP, there is ample capacity to serve existing and projected future demand for the city and MUGA. PSE plans years in advance to ensure they have sufficient supply and infrastructure to deliver clean, safe, and reliable energy. The IRP is a ten year view of PSE's energy resource needs, which is developed through a planning process that evaluates how a range of potential future outcomes could affect PSE's ability to meet customers' electric and natural gas supply needs. The analysis considers policies, costs, economic conditions, physical energy systems, and future resource procurement.

PSE's latest IRP was filed in 2021 and is the foundation for PSE's first Clean Energy Implementation Plan (CEIP). Similar to Snohomish County PUD, PSE is subject to Washington State's CETA, which requires PSE to provide electricity free of greenhouse gases by 2045.

To meet the regional, city, and MUGA natural gas demand, PSE's delivery system is modified every year to meet natural gas volume and pressure demands for new and/or existing customers, accommodate rights-of-way improvements, and address pipeline integrity issues. The City and PSE work together to plan major construction projects in Mill Creek to coordinate road restoration with pipeline repair and replacement projects.

FIGURE 01. **Electrical and Gas Utilities**



- 115 kV Transmission Line Corridor
- 230 kV Transmission Line Corridor
- Electric Transmission Line
- Gas High Pressure Line
- Mill Creek City Limits
- Mill Creek Municipal Growth Urban Area (MUGA)



## Water

The primary source of water supply for Snohomish County is the Sultan River/Spada Lake Reservoir/Chaplain Reservoir water works complex operated by the City of Everett. The Everett water works complex includes a water filtration plant and all potable water entering the distribution system flows through the filtration plant.

Everett's 2020 Comprehensive Water Plan indicates that there is adequate water supply to meet the water needs of its wholesale customers, including **Alderwood Water & Wastewater District (Alderwood)** and **Silver Lake Water & Sewer District (Silver Lake)**, beyond 2060.

Water and sanitary sewer services are provided to the city by Alderwood and Silver Lake. District boundaries are shown in the maps in Figures 2, 3, 4, and 5. By agreement, Silver Lake has a supply of up to 9 million gallons per day (mgd) through Clearview Water Supply Agency (CWSA) and 5 mgd through Alderwood.

### **1. WATER TRANSMISSION, STORAGE, AND DISTRIBUTION FACILITIES:**

Water is transmitted from the water works complex to the Everett water system by means of four transmission lines located in two transmission corridors. These transmission pipelines transmit water into the City of Everett and CWSA reservoirs, from which Alderwood and Silver Lake draw their water.

In Mill Creek and its MUGA, water transmission facilities are part of a regional water delivery system consisting of several reservoirs and transmission mains. Both Alderwood and Silver Lake operate reservoirs and transmit water through large mains typically located in public rights-of-way. Silver Lake operates a reservoir in Mill Creek off 132nd.

### **2. CAPACITY OF THE WATER UTILITY SYSTEM:**

According to the 2017 Comprehensive Water Plans by both Alderwood and Silver Lake, there is adequate capacity to serve the current and future demands for Mill Creek. The demand forecast in Alderwood's plan indicates that the emphasis of the district's Capital Improvement Plan should shift from capacity projects to infrastructure repair and replacement until at least 2035.

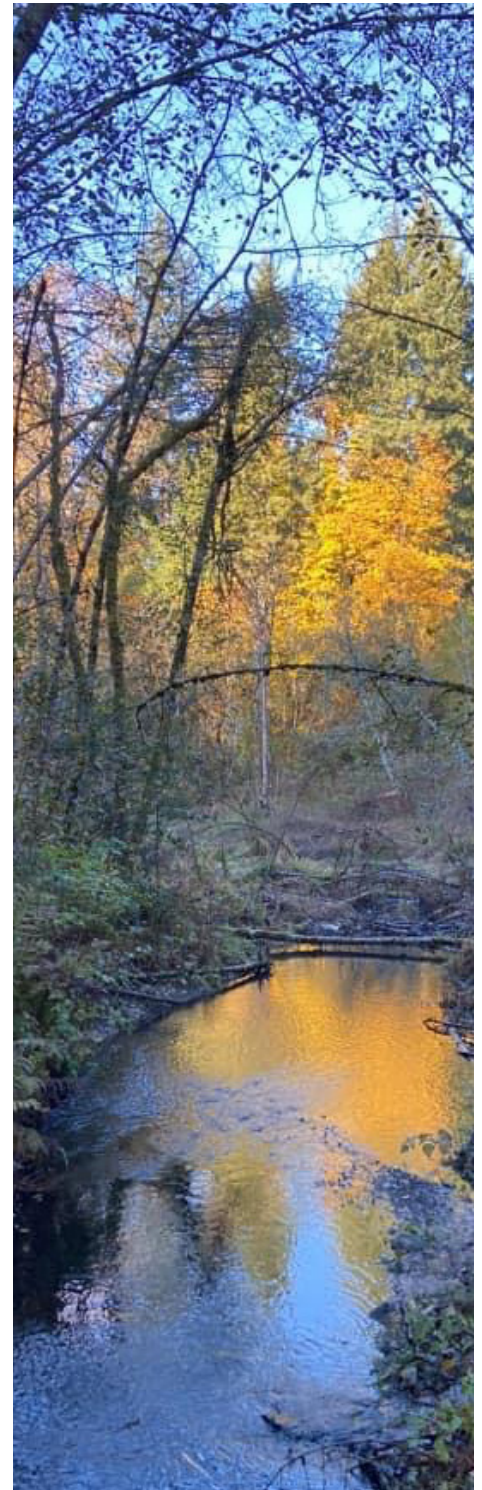


FIGURE 02.

# Silver Lake Water & Sewer District - Water

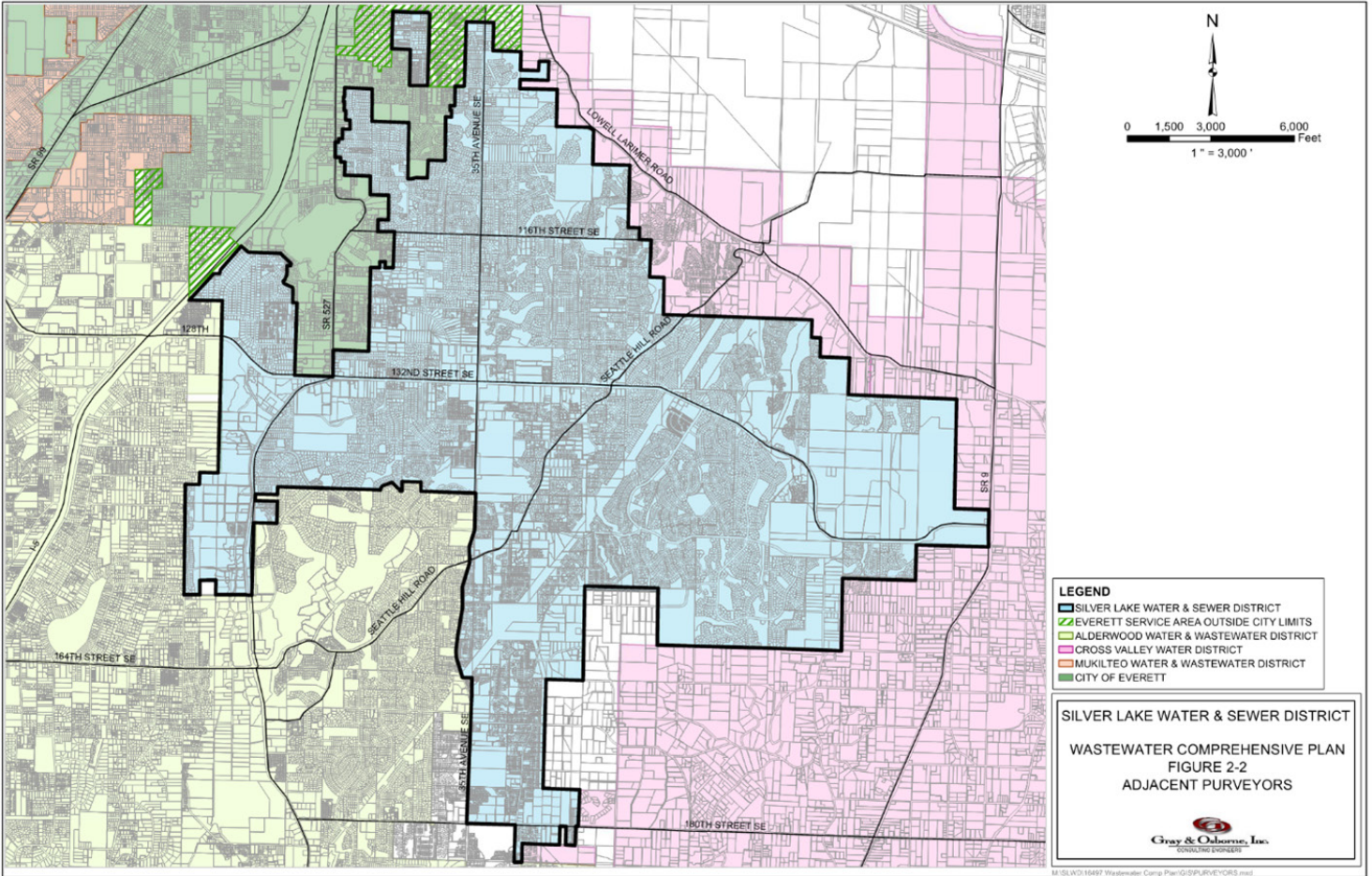




FIGURE 03.

# Silver Lake Water & Sewer District - Sewer

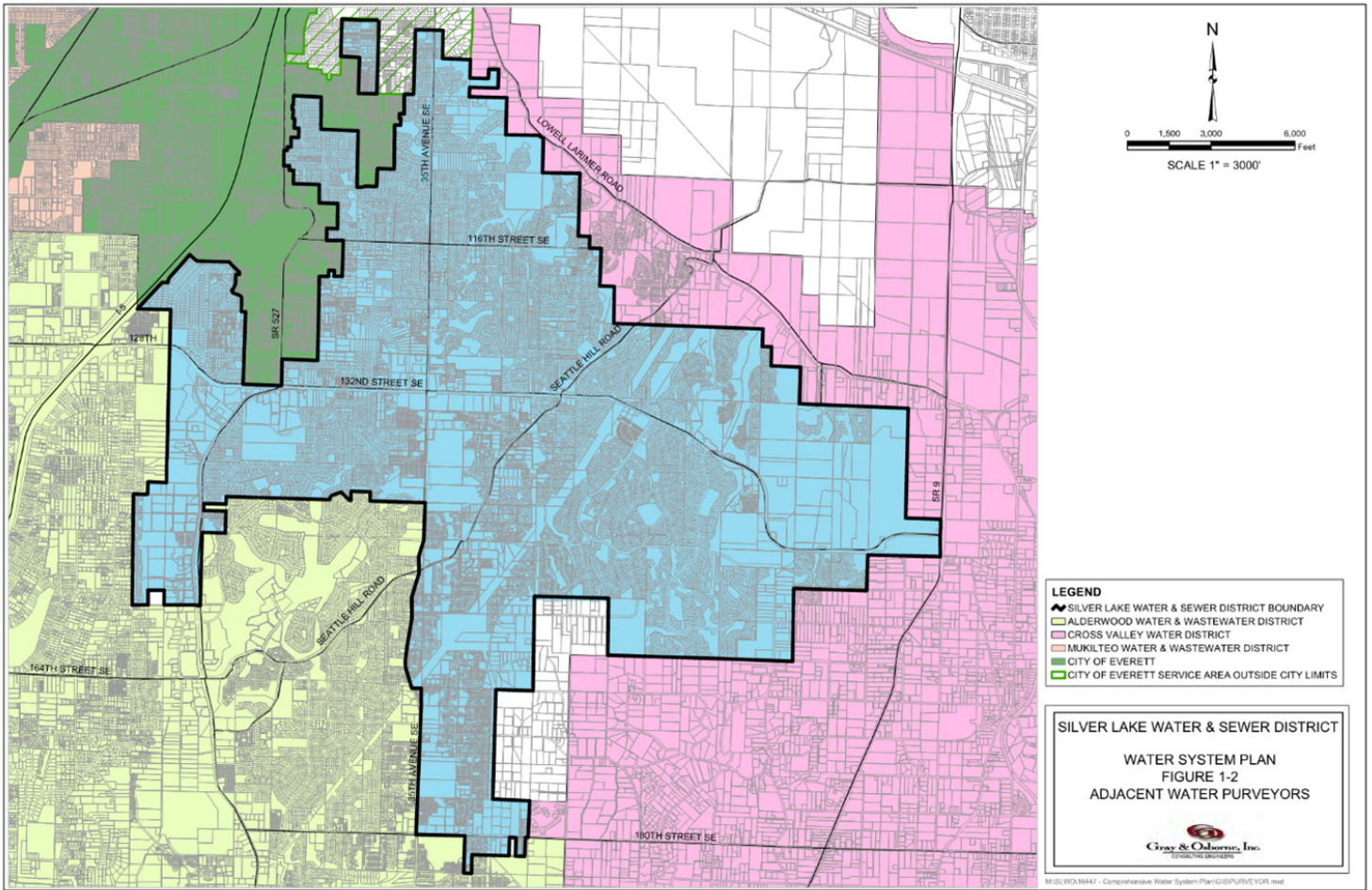


FIGURE 04.

## Alderwood Water & Wastewater District

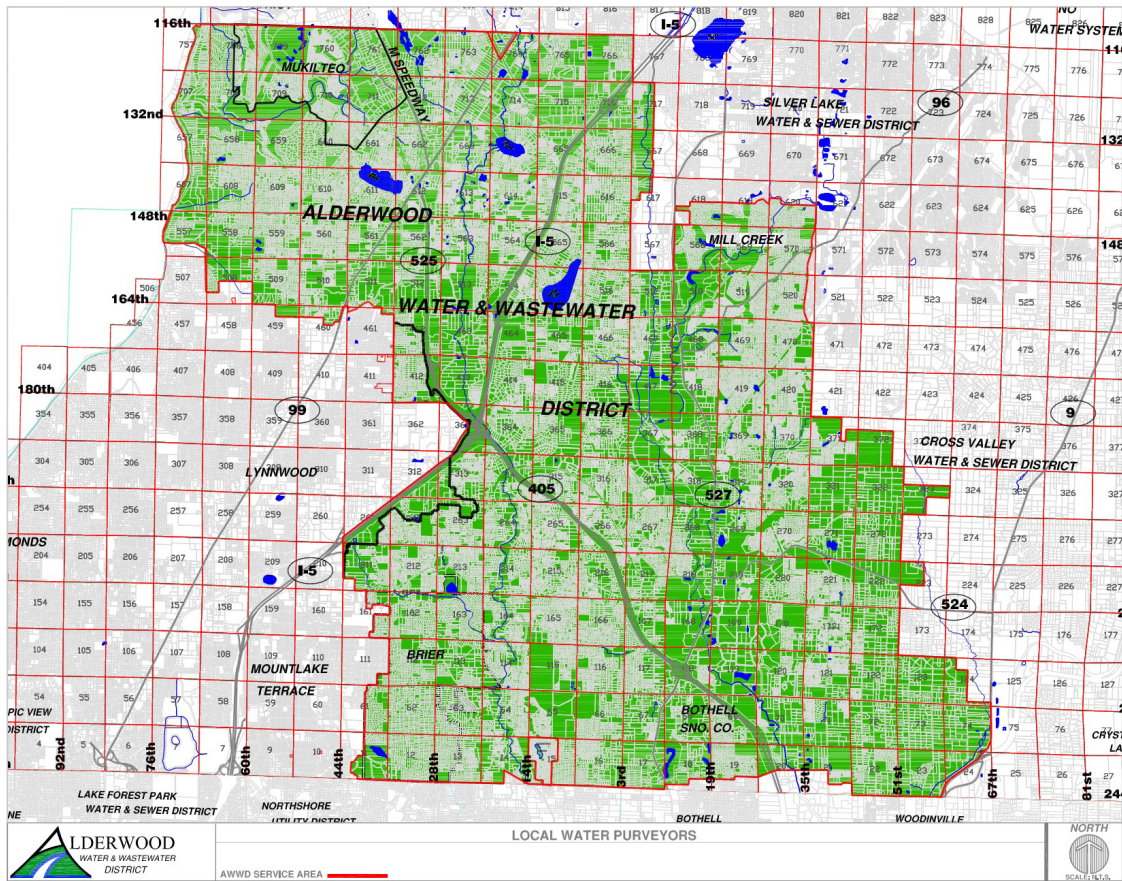


TABLE 01.

## Sewer Agreement Capacity Evaluation Study

DISCHARGE DESCRIPTION	PURCHASE CAPACITY	PEAK WET WEATHER FLOW	
		2015	BUILDOUT
Everett Interceptor	11,500 gpm	5,900 gpm	8,768 gpm
Everett WPCF	6.60 mgd	4.55 mgd	6.58 mgd
Headworks	11,500 gpd	5,900 gpm	8,768 gpm
Flow to Alderwood <sup>1</sup>	<sup>2</sup>	1,543 gpm	2,552 gpm <sup>3</sup>

<sup>1</sup> Total Flow through several connections to AWWD's collection system.

gpm = gallon per minute | mgd = million gallons per day

<sup>2</sup> Capacity not specified in AWWD Agreement.

<sup>3</sup> Includes 800 gpm peak flow from WWD Lift Station 11 directed through District's system to discharge back into AWWD's North Creek Basin.

# Sanitary Sewer

Sanitary sewage collected within the districts is transmitted via pipelines to waste treatment facilities outside the boundaries of the districts. According to Alderwood and Silver Lake, there is capacity to meet existing demand for both the city and its MUGA.

## 1. SANITARY SEWER COLLECTION FACILITIES:

### **ALDERWOOD**

Sanitary sewage generated in the Alderwood portion of Mill Creek and its MUGA flows south by gravity via the North Creek Trunkline to sewage treatment facilities owned and operated by King County.

### **SILVER LAKE**

Most of the area within Mill Creek and its MUGA served by Silver Lake flows south into the Alderwood district, and into the North Creek Trunkline. For a small area in the northeast corner of the city (east of 35th Avenue and north of 169th Street and including the Silver Crest neighborhood and the Thomas Lake Shopping Center) flows north to treatment facilities owned and operated by the City of Everett. A small portion of the city does not presently have sewer service (septic only). Silver Lake has plans in the next few years to replace aging sewer mains and extend service availability in these areas of the city.

## 2. CAPACITY OF SEWAGE DISPOSAL SYSTEM:

### **ALDERWOOD**

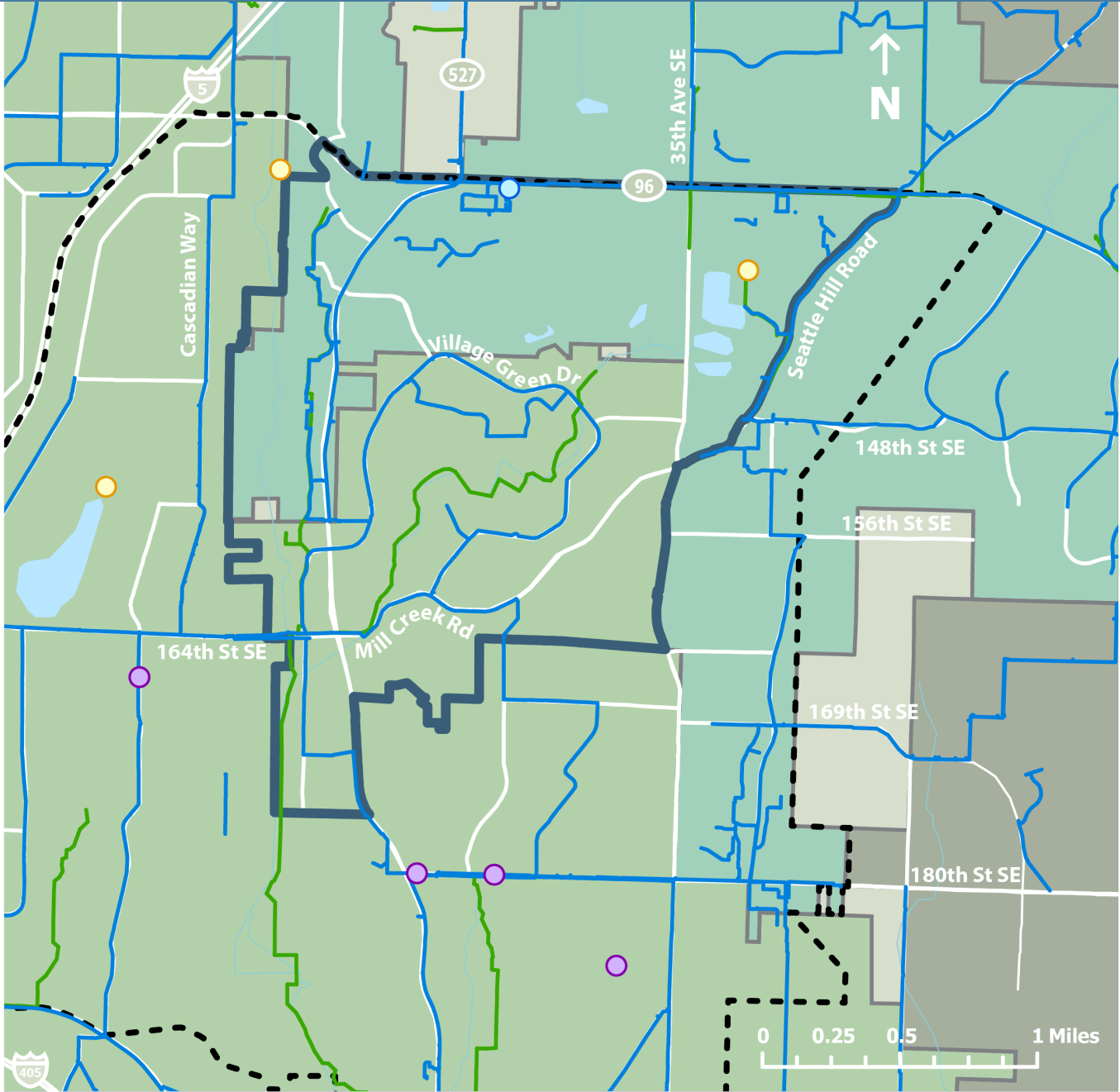
Alderwood has an agreement with the King County Waste Treatment Division (KCWTD) of the Department of Natural Resources and Parks to dispose of sanitary sewage and industrial waste at KCWTD sewage treatment facilities. In response to increased growth in the Puget Sound region, King County constructed a regional wastewater treatment plant located northeast of Woodinville, known as Brightwater. This facility was built in 2011 and serves portions of King and Snohomish counties and provides additional capacity to serve the district.

If the expected rate of growth from 2025-2035 continues, the district will reach the current maximum capacity for the Picnic Point Wastewater Treatment Facility, well beyond the planning period. Additionally, the demand forecast indicates that the emphasis of the Capital Improvement Program should shift from capacity projects to infrastructure repair and replacement until at least 2035.

### **SILVER LAKE**

The overall capacity of the sewage disposal system is generally determined by the capacity of the downstream treatment facilities. By contract with the City of Everett, Silver Lake has purchased the right to discharge into the City of Everett's facilities. As seen in the table below, the district's purchased capacity in Everett's facilities is sufficient through buildout in the district.

FIGURE 05. Water and Sewer Utilities



- Lift Station
- Pressure Reducing Valve
- Reservoir
- Sewerline Diameter Greater than 12 Inches
- Waterline Diameter Greater than 11 Inches
- Alderwood Water & Wastewater District
- Silver Lake Water & Sewer District
- Cross Valley Water District
- Mill Creek City Limits
- Mill Creek Municipal Urban Growth Area (MUGA)



## Telecommunications Services

Telecommunications encompass the transmission and reception of digital content by a variety of methods. These can include wired technologies, such as electrical cables and wires, or via light transmissions over optical fibers. Wireless methods can include over-the-air broadcasts, radio waves, cellular networks, or other means.

Telecommunications companies are privately owned, publicly regulated, and driven by market forces rather than statutory requirements. Telecommunications include, but are not limited to, landline telephone, mobile voice and data wireless services, internet access, and cable television. In some cases, these telecommunications services will use existing utility corridors within the public rights-of-way (ROW), and can be regulated by the City through a franchise agreement or the ROW permit process.

Telecommunications technologies are changing rapidly and will continue to change during the horizon of this plan. Effective telecommunications services are critical in several ways. They promote and enhance individual information exchange, contribute to a robust regional economy, and afford numerous public services, including delivery of emergency services, education, and opportunities for citizen involvement. In addition, rapidly changing technologies are providing opportunities for alternative work environments and lifestyles as more people transmit and receive information through the internet. The City will continue to work with private sector partners to accommodate the equipment needed to provide these services as technology evolves and to meet customer demands. No obstacles to the adequate provision of telecommunications services are anticipated during the plan period.

## Liquid Petroleum Pipelines

Olympic Pipeline is a 400-mile interstate pipeline system that includes 12-inch, 14-inch, 16-inch, and 20-inch pipelines. The pipeline runs along a 299-mile corridor from Blaine, Washington to Portland, Oregon. The system transports gasoline, diesel, and jet fuel. One of the transmission lines runs through the northeast corner of the city along the eastern boundary of the East Gateway Urban Village Subarea.

## Regional/Local Issues

**Following is a discussion of issues associated with the provision of utility services within Mill Creek and its MUGA. Policies aimed at addressing issues raised in this section and throughout the element are provided earlier in this chapter of the plan.**

### Regional Context of Utility Services

Utility infrastructure is not generally contained within jurisdictional boundaries. Distribution systems often serve several jurisdictions. For example, electrical transmission systems link individual utilities from Canada to California.

### “Essential Public Facilities” Designation/Siting Criteria

Essential public facilities are permitted through the Conditional Use Permit process established in the Mill Creek Municipal Code. The City will use these procedures for the siting of utilities that are deemed essential public facilities.

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## **Need for Adequate Land Designated to Permit the Development of New/ Expanded Utility Facilities**

Utility providers often have difficulty obtaining sites for their facilities as a result of perceived health and safety concerns, public opposition, or geological and geographical difficulties.

## **Need for Policies and Development Regulations that Facilitate the Predictable and Timely Development of Utility Facilities**

To fulfill their public service obligations, utility providers must place and maintain utility facilities when and where needed in a timely fashion. If demand outpaces facility capacity, the consequences (i.e., power outages) could affect large numbers of residential and commercial customers.

## **Utility Corridors - Need for City/Utility Providers Coordination**

Often, several utilities share the same corridor, and in some cases, the same trenches. Installation and maintenance of utility facilities are costly, both to the utilities and the City/public. Utilities are impacted directly by the actual costs of the labor and materials for the work; and the City/public are indirectly affected by the traffic congestion resulting from trenching activities within rights-of-way (reduced level of safety, aggravation and lost time).

## **Need for the Sharing of Planning Information**

Both the City and the utility providers have a need for accurate statistical data to plan for the future. Although the utilities and the City may use different forecasting methodologies, the population and employment forecasts are beneficial to all parties.



# CAPITAL FACILITIES

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# Introduction

**The Capital Facilities element has been developed in accordance with the Growth Management Act (GMA) to ensure that there is an adequate level of capital facilities to meet the existing and anticipated development within the City of Mill Creek and its Municipal Urban Growth Area (MUGA).**

To accomplish this intent, this chapter provides:

- » A description of Level of Service (LOS) Standards and Guidelines for measuring the adequacy of capital facilities;
- » An inventory, capacity analysis, and the general location of existing capital facilities,
- » A forecast of the need for new and/or expanded capital facilities.
- » The proposed locations and capacities of any proposed new or expanded capital facilities.
- » Policies to ensure the timely and efficient provision of capital facilities.

The purpose of this chapter is to identify and prioritize capital facility needs that are incorporated into the six-year Capital Improvement Plan (CIP), which identifies specific capital projects in the categories of Parks, Transportation, Stormwater and City Facilities. The CIP is adopted as a separate document and identifies specific capital improvement projects and funding sources, including park and traffic impact mitigation fees. The CIP is updated every two years in conjunction with the biennial budget, and is adopted as part of the Capital Facilities element by reference.



# CAPITAL FACILITIES GOALS AND POLICIES

## GOAL CF-1

Monitor capital facilities to provide high-quality, sustainable, equitable, and affordable services for current and future Mill Creek residents and employees.



### **POLICY CF-1.1**

Maintain an inventory and monitor the capacity of capital facilities within the city. If it is determined that probable funding will be insufficient to meet the established minimum Level of Service Standards, reassess the Land Use element and/or reevaluate the established Level of Service Standards.

### **POLICY CF-1.2**

In reviewing proposals to annex property into the city, assess the impacts of the annexation to the adopted Level of Service Standards. The City may consider appropriate mitigation measures to offset any identified impacts to the existing Level of Service as a condition of annexation.

### **POLICY CF-1.3**

Update the six-year Capital Improvement Plan in conjunction with the biennial budget and identify specific capital improvement projects and funding sources. The budgeting of capital facilities projects shall be consistent with and help to achieve the goals and policies as set forth in the Comprehensive Plan.

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### **POLICY CF-1.4**

Develop and coordinate compatible capital facility construction standards for all service providers in the city and the Municipal Urban Growth Area.

### **POLICY CF-1.5**

Monitor the capacity of City facilities and resources (including City Hall North and South) to ensure the needs of the community and City operations are being met.

### **POLICY CF-1.6**

Require development proponents to mitigate their proportional impacts on public school capital facilities.

### **POLICY CF-1.7**

Work cooperatively with the Everett School District to plan for school facilities to meet the existing and future community needs, including siting and designing schools to support safe, walkable access for Mill Creek students.

### **POLICY CF-1.8**

Identify public facilities on which impact fees will be spent.

### **POLICY CF-1.9**

Provide a Public Works Maintenance Facility that will serve the department over the long-term.

## GOAL CF-2

Develop, implement, and maintain a long-range financial plan for City operations.



### **POLICY CF-2.1**

Develop and implement a Capital Facilities Plan to assist in the long-range financial resource planning for public improvements and programs. The plan shall include Level of Service standards and guidelines for various public facilities and ensure that appropriate services to support development are adequate at the time of occupancy and use.

### **POLICY CF-2.2**

Develop financial policies for the City that enable the Council and City Manager to maintain a favorable financial condition.

### **POLICY CF-2.3**

Explore new sources of funding to support Mill Creek infrastructure and services.

## GOAL CF-3

Continue to provide stormwater systems that are planned, developed, and maintained to reduce flooding, protect water quality, and preserve natural systems.



### **POLICY CF-3.1**

Continue to operate a stormwater management program to integrate the private facilities with a unified public system to ensure the long-term compliance with Washington State Department of Ecology regulations, including the Western Washington Phase II NPDES Permit.

### **POLICY CF-3.2**

Inspect all privately-owned stormwater systems within the city limits to ensure that they are functioning properly using the Washington State Department of Ecology's Stormwater Management Manual for Western Washington, as adopted by the City. Ensure that privately owned stormwater facilities are maintained in accordance with current City policies. Notify the owners of privately held stormwater facilities of the need to maintain said facilities.

### **POLICY CF-3.3**

Inspect, clean, and maintain City-owned stormwater facilities using the Washington State Department of Ecology's Stormwater Management Manual for Western Washington, as adopted by the City.

### **POLICY CF-3.4**

For new land development proposals and City capital improvement projects, require stormwater management facilities that incorporate detention and water quality treatment facilities, along with specific maintenance and management programs, consistent with the Department of Ecology Stormwater Management Manual for Western Washington adopted by the City.

### **POLICY CF-3.5**

To reduce the volume of urban stormwater runoff and its impacts on local and regional water quality, encourage the use of low impact development methods to minimize the impacts of water quantity and quality upon receiving waters.

## GOAL CF-4

Facilitate protecting and enhancing the environment and public health and safety when providing capital facilities.



### **POLICY CF-4.1**

As the city grows, ensure that fire and police capital facilities meet the needs of the increased population.

### **POLICY CF-4.2**

Provide public safety communications through participation in the Snohomish County Emergency Radio System (SERS). Real Estate Excise Tax (REET) monies may be used to fund the City's participation.

### **POLICY CF-4.3**

Consider climate change, economic, and health impacts when siting and building capital facilities and support efforts to increase the resilience of existing infrastructure in Mill Creek.



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# CAPITAL FACILITIES SUPPORTING ANALYSIS

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## Level of Service Standards and Guidelines

To determine the existing and projected capacity of capital facilities, two different means or tools have been established: Level of Service Standards and Level of Service Guidelines.

### Level of Service Standards

Levels of Service Standards are binding requirements subject to the concept of concurrency under the Growth Management Act. Briefly stated, the Act prohibits jurisdictions from approving a development if the development causes the Level of Service to decline below the minimum standard adopted for a specific capital facility, unless improvements or strategies to accommodate the impacts of development are made concurrent with development. Further, the Act defines “concurrent with development” as the required improvements or strategies in place at the time of development, or a financial commitment in place to complete the improvements or strategy within six years.

The City has chosen to establish Level of Service Standards for local transportation facilities and for neighborhood park facilities. A six-year Capital Improvement Plan that illustrates the City’s commitment and ability to achieve the established Level of Service Standards for these facilities is adopted every other year in conjunction with the biennial budget.

### Level of Service Guidelines

Although not required by the Growth Management Act, Level of Service Guidelines are established for other capital facilities provided by the City. Level of Service Guidelines, in contrast to Level of Service Standards, are not subject to concurrency and are used as general recommendations for guiding the design and development of the remaining capital facilities. Several capital facilities subject to the Level of Service Guidelines are funded within the six-year Capital Improvement Plan.

# Inventory and Capacity Analysis

**City-provided capital facilities addressed in the Capital Facilities Plan element include the following:**

- » Parks and Recreation
- » Transportation
- » Stormwater Management
- » City Facilities

Presented below is the existing inventory of City-provided capital facilities, an analysis of their current capacity, and findings related to the surplus or deficiency of facilities necessary to accommodate the existing and projected population. The capacity analysis is used later in the element to identify projects needed to maintain the existing Level of Service Standards or Guidelines or alleviate identified deficiencies.

## Parks and Recreation Facilities

### 1. INVENTORY OF EXISTING FACILITIES:

The Comprehensive Plan includes a Parks, Recreation, and Open Space element that addresses in detail the City's parks inventory and capacity. In summary, the City currently owns and operates eleven neighborhood parks, which are subject to Level of Service Standards. Neighborhood parks include Buffalo Park, Exploration Park, Heron Park, Highlands Park, Nickel Creek Park, Pine Meadow Park, Pine Meadow Park West, Cougar Park, Hillside Park, Library Park, and Silver Crest Park. The cumulative area of these parks is 43 acres. This amount becomes the basis for evaluating existing and future Levels of Service for neighborhood parks.

Neighborhood park amenities include children's play equipment, meandering pedestrian paths, basketball and tennis courts, restroom facilities, and open play areas. Mill Creek Sports Park is the City's only developed community park. Approximately five acres in size, the park includes a lighted ball field (designed to accommodate Little League baseball, youth softball, and youth soccer), seating, skate park, restroom facilities, tot lot play equipment, and concession stand.

The location of these parks is shown on the Parks and Open Space Map in the Parks, Recreation, and Open Space element.





**Picnic shelter  
at Heron Park**

## **2. EXISTING CAPACITY OF PARKS AND RECREATION FACILITIES:**

The capacity of the City’s park system can be measured by comparing the park facility inventory with the Level of Service Standard established in the Parks, Recreation, and Open Space element.

## **3. LEVEL OF SERVICE STANDARD FOR NEIGHBORHOOD PARKS:**

In the Parks, Recreation, and Open Space element, the following Level of Service Standard has been established to assess the capacity of the City’s neighborhood parks:

- » The Park and Open Space Level of Service Standard for neighborhood parks is two (2) usable acres of park land for every 1,000 people.

Based upon this Level of Service Standard, roughly 42 acres of neighborhood parks are needed to serve the 2024 population of 21,630. The City currently has 43 acres of neighborhood parks, meaning the Level of Service Standards are being met based on most recent population data provided by the Office of Financial Management. The Level of Service Standards may be updated as part of the proposed Parks, Recreation, and Open Space Plan, to be completed in the coming years.

## **4. FINDING:**

Looking to the future, the population within the City of Mill Creek is expected to grow to 24,813 by the year 2044. If the existing Level of Service Standard remains at 2 acres per 1,000, there would be 50 acres of Neighborhood parks needed. However, the forthcoming Parks, Recreation, and Open Space Plan may change LOS Standards.

In addition, as the City Council approves annexation requests within the MUGA, the City should ensure that adequate land for neighborhood parks is provided consistent with the standard outlined in the forthcoming Parks, Recreation, and Open Space Plan. Alternatively, Level of Service can be adjusted for areas within the MUGA at the time of annexation if land is not available or the City does not have funding to acquire and develop additional park land.

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## Transportation Facilities

### 1. INVENTORY OF EXISTING TRANSPORTATION FACILITIES:

The Comprehensive Plan's Transportation element includes a complete inventory and discussion of the City's motorized and non-motorized facilities. As of 2024, the City owns and maintains approximately 77 lane miles of residential streets, 19 lane miles of collector streets, 10 lane miles of arterial streets for a total of 106 lane miles of roadway. In addition, there are 22 lane miles of state highway within the city limits that are under the jurisdiction and operational control of the Washington State Department of Transportation.

### 2. CAPACITY OF EXISTING TRANSPORTATION FACILITIES:

The existing capacity of the City's roadway system can be measured by comparing the current Level of Service to the minimum Level of Service Standards and Guidelines established in the Transportation Element. Consistency with the Highway Capacity Manual, the Level of Service for City streets, and Regionally Significant State Highways is determined by measuring the delay at individual intersections and ranges between A and F, where A has the shortest delay and has the longest delay.

A large percentage of the traffic in the city is due to "pass through" trips. These trips come from people who live outside Mill Creek but commute on the roadway system. Since it is not always feasible to construct a roadway system to handle the maximum traffic volume, the City recognizes that significant delays occur during the peak commuting hours.

In addition, the City has no operational control over the Regionally Significant State Highways, SR 96, and SR 527, which are under the jurisdiction of the Washington State Department of Transportation.

### 3. LEVEL OF SERVICE STANDARDS AND GUIDELINES FOR TRANSPORTATION FACILITIES:

In the Transportation element, the Level of Service Standards and Guidelines have been established to assess the capacity of transportation facilities in Mill Creek. The Level of Service Standards for streets, as well as the Level of Service Guidelines for Regionally Significant State Highways, are measured at individual intersections and shall not fall below the established minimum Level of Service Standards.

### 4. FINDING:

As shown in the Transportation element, the estimated intersection peak hour Level of Service meets the established minimum Level of Service Standard for City streets. However, several intersections on the Regionally Significant State Highways are at or below the minimum Level of Service Guidelines. The same results are found for the 2044 peak hour.

As future development impacts the Levels of Service listed in the Transportation element, transportation facility improvements, mitigation measures and/or other strategies will be applied through the concurrence process associated with the private development to maintain the Level of Service. Additional measures may be necessary in the Capital Improvement Plan over the 20-year planning period.



## Stormwater Management Facilities

The City of Mill Creek adopted a Surface Water Management Program in 1999. This program was established to maintain and improve the City's stormwater facilities and establish an educational program for protecting water quality of streams in Mill Creek. Mill Creek follows the guidance of Washington State Department of Ecology via the National Pollutant Discharge Elimination System (NPDES) Western Washington Phase II Municipal Stormwater Permit.

### 1. INVENTORY OF EXISTING STORMWATER MANAGEMENT FACILITIES:

The existing stormwater management facilities that serve Mill Creek consist of a combination of both publicly and privately owned and maintained drainage systems. As of July 2015, the City was responsible for maintaining approximately 5,008 catch basins, 88.17 miles of pipe, 39 detention structures and 15 water quality filter vaults.

The City maintains a detailed inventory of the stormwater facilities within Mill Creek, which is updated on a regular basis by the City's Surface Water Division as new development occurs. The general locations of the major stormwater facilities are illustrated via Geographic Information System (GIS) on the City of Mill Creek Stormwater Facilities Map.

### 2. CAPACITY OF EXISTING AND NEW STORMWATER MANAGEMENT FACILITIES:

The capacity of the stormwater management facilities can be determined by comparing the existing facilities with the established Level of Service Standards.

### 3. STORMWATER MANAGEMENT SYSTEMS LEVEL OF SERVICE STANDARDS:

The following Level of Service Standard is to establish design criteria for new stormwater management facilities within the City:

- » New stormwater management systems must be designed to meet the requirements of the Department of Ecology Stormwater Management Manual for Western Washington currently adopted by the City of Mill Creek.

In addition, the existing stormwater infrastructure system must be inspected and maintained on a regular basis in accordance with the requirements in the current NPDES Phase II Municipal Stormwater Permit.

#### **4. FINDING:**

##### ***Stormwater Detention and Water Quality Treatment Systems:***

New developments are required to meet the City's Level of Service Standards. However, many of the existing drainage facilities in Mill Creek do not provide adequate flow control or water quality treatment for stormwater runoff.

While these facilities do not meet current design standards, retrofitting the detention systems is generally not feasible due to the cost of acquiring the additional property that would be required. Most existing detention facilities would need to be significantly enlarged or reconstructed, which would encroach into established buildings or environmentally sensitive areas.

Water quality retrofits are often more feasible due to the smaller footprint of the new facilities. As part of the Capital Improvement Plan, several projects have been completed to improve runoff treatment at public facilities and on existing roadways.

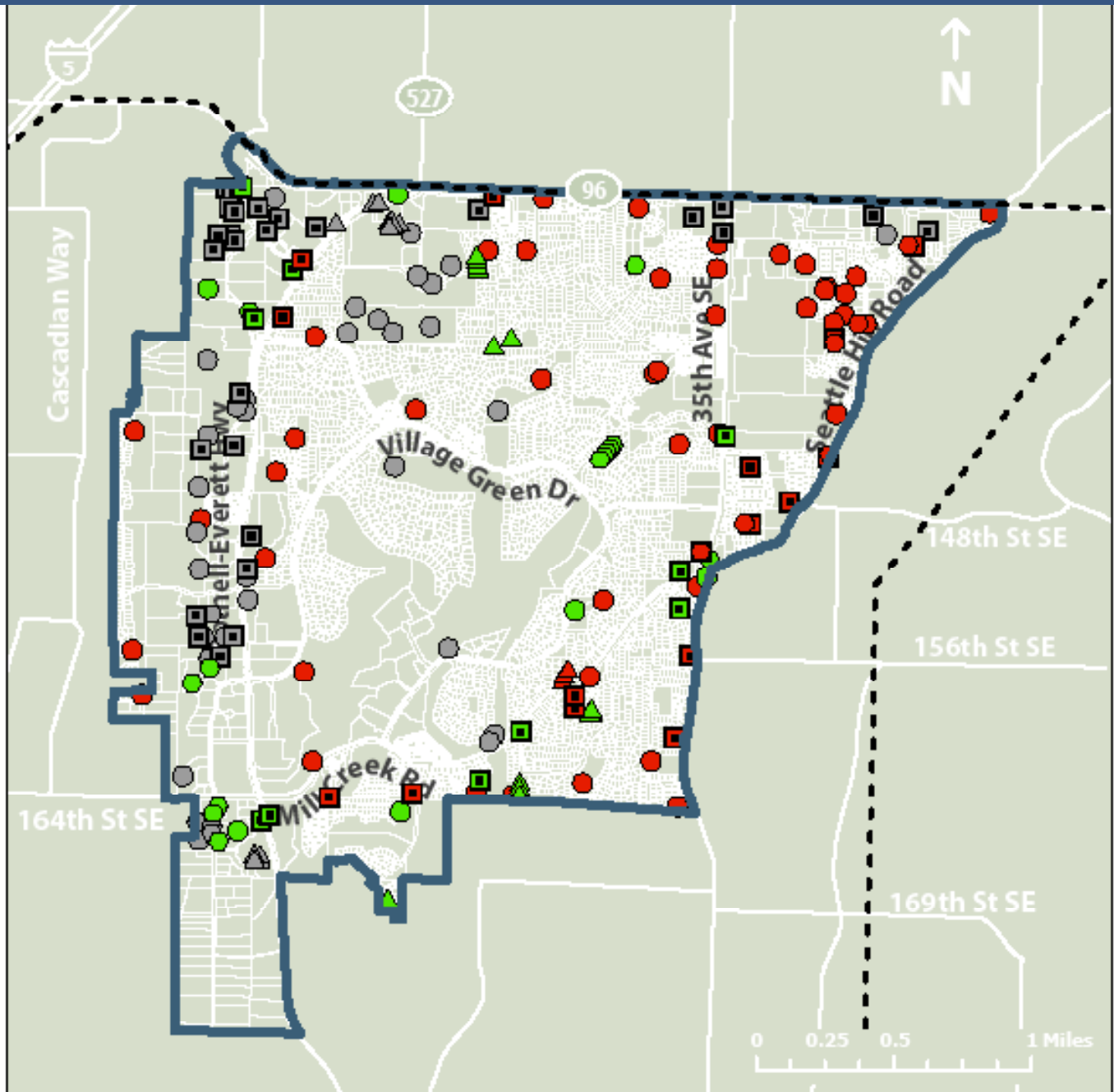
##### ***Stormwater Infrastructure Maintenance and Operations:***

The public stormwater system is aging and nearing the end of the design life. However, the City has an ongoing inspection and cleaning program to maintain the network of pipe and catch basins, as well as detect illicit discharge locations, and is performing repair and replacement projects as necessary.

As part of the City's Surface Water Utility Program and Capital Improvement Plan, the City is making improvements to existing stormwater facilities wherever possible.



FIGURE 01. Stormwater Facilities



- |                                  |  |
|----------------------------------|--|
| ▲ Private Detention Pipe         | ● City HOA Media Filter Vault                    |
| ● Private HOA Detention Pond     | ▲ Commercial Detention Pipe                      |
| ■ Private HOA Detention Vault    | ● Commercial HOA Detention Pond                  |
| ● Private HOA Media Filter Vault | ■ Commercial HOA Detention Vault                 |
| ▲ City Detention Pipe            | ● Commercial HOA Media Filter Vault              |
| ● City HOA Detention Pond        | ▭ Mill Creek City Limits                         |
| ■ City HOA Detention Vault       | ⌈⌋ Mill Creek Municipal Urban Growth Area (MUGA) |



# City Facilities

## 1. INVENTORY OF EXISTING CITY FACILITIES:

The City owns approximately 16.5 acres of un- or under-developed property on four different parcels, one on the east side of 35th Avenue SE and three located north of the Mill Creek Sports Park complex.

### Undeveloped Property

The City owns approximately 16.5 acres of un- or under-developed property on five different parcels, one on the east side of 35th Avenue SE and four located north of the Mill Creek Sports Park complex. The location and area of each property are shown in Table 1 and on the Essential Public Facilities map (Figure 2).

### City Hall South

The City of Mill Creek’s City Hall South facility consists of a 15,846 square foot structure on a 2.46 acre site at 15728 Main Street. The City’s Council Chambers, administrative departments, public works shop, and police department are housed within this facility.

### City Hall North

The City also owns a building adjacent to City Hall at 15720 Main Street that is used as a combination of City administrative offices, storage areas, archives, leased office space, and City recreational / community program functions. This building is 31,842 square feet in size on a 2.02 acre parcel.

A portion of the Dobson property is currently utilized as an ad hoc Public Works yard for materials stockpiles, large item storage, and for transfer of street sweepings from sweeper to dumpsters for storage and outhaul. This space is not fenced or lighted, and only has temporary improvements. These functions will need to move elsewhere when the Dobson property is developed for other municipal uses.

TABLE 01.

## City of Mill Creek Inventory of Undeveloped Properties

PROPERTY AND LOCATION	AREA (ACRES)
Cook Property – 13628 North Creek Drive	5.0
Remillard Property – 13615 North Creek Drive	4.55
Dobson Property – 13723 North Creek Drive	4.75
Church Property – 13716 Bothell Everett Highway	4.49
Penny Creek parcel adjacent to Pacific Topsoils Parcel – approximately 13515 35th Avenue SE	2.2
<b>TOTAL</b>	<b>20.99</b>

## 2. CAPACITY OF EXISTING CITY FACILITIES:

The capacity of City facilities can be determined by comparing the existing facilities with the established Level of Service Guidelines.

## 3. LEVEL OF SERVICE GUIDELINES:

### *City Facilities*

The following Level of Service Guideline is established to assess the capacity of City facilities:

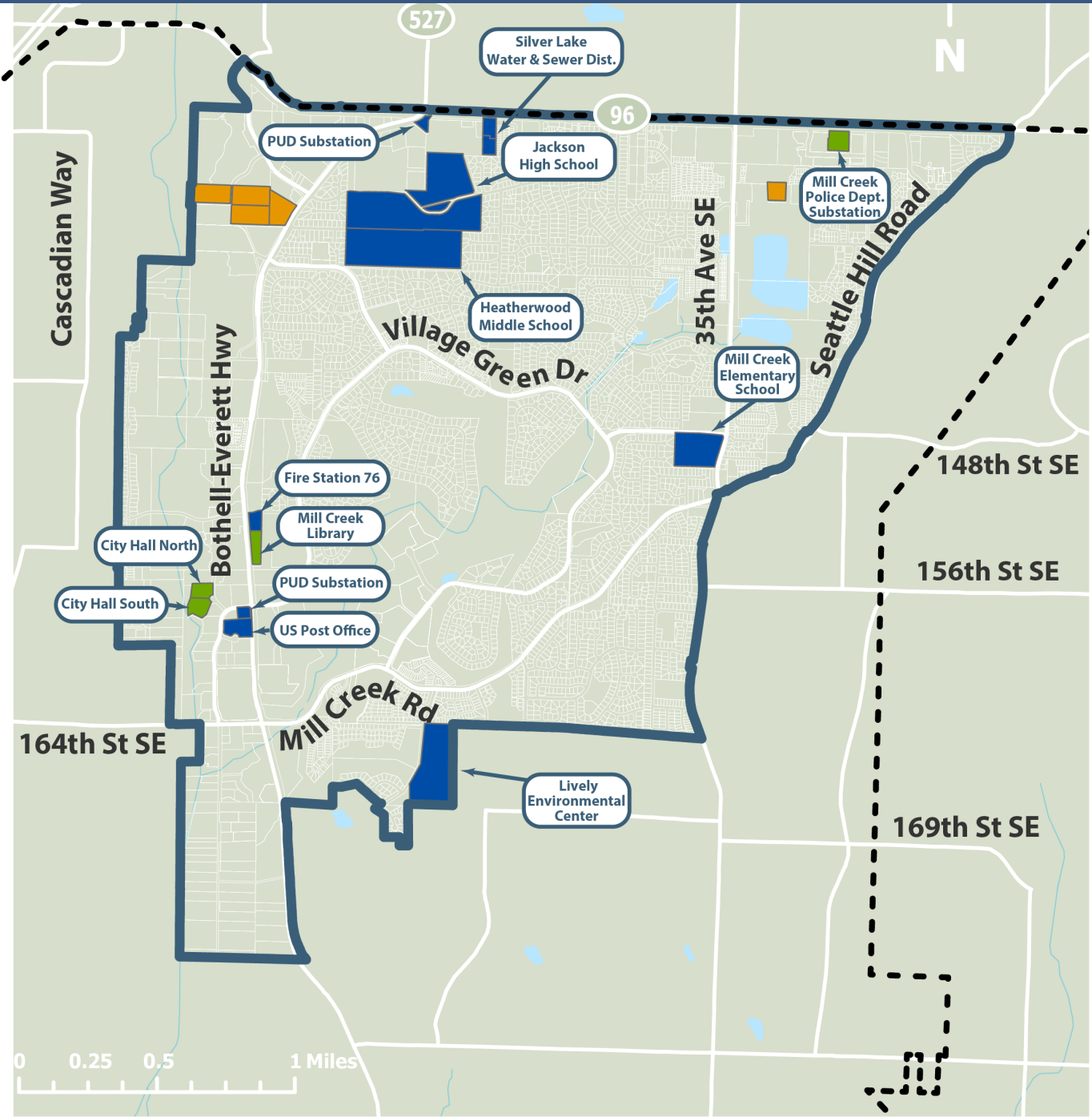
Adequate facilities should be available for City personnel to perform their various service functions to the satisfaction of the community. This would include administration, community development, public works, engineering, finance, police, recreation programs, and meeting facilities. Space for the storage and maintenance of City equipment is also necessary.

At the time of the 2015 Comprehensive Plan, City personnel were performing their service functions in cramped quarters in the main City Hall building (now City Hall South), with detrimental effects on city operations and services. In 2017, the City moved Public Works Engineering, Planning and Development Services, and Marketing and Recreation staff to administrative offices on the first floor of the City Hall North building. Administrative functions in City Hall South were expanded to relieve crowding, and the Police office and storage areas were expanded and renovated to better accommodate needs. In 2024, a Police Precinct office (nominally 500 square feet) was established in the East Gateway Village Subarea (4015 133rd Street SE) within the Farm mixed-use development under a 50 year lease agreement.

## 4. FINDING:

City Hall facilities are operating at established Level of Service Guidelines for office functions. The City infrastructure is aging, and the City has therefore recognized the need to expand their ability to self-perform a wider range of maintenance and repair functions for City roads, parks, facilities, and stormwater infrastructure. The City needs to find a suitable location and then construct a Public Works Maintenance Shop and Yard for safe storage of equipment, supplies, vehicles, and staff. A facility scoping study and property acquisition project is in progress as of 2024-2025, and will lead to a future capital construction project.

FIGURE 02. Essential Public Facilities Map



- City-Owned Capital Facilities
- Other Agency-Owned Capital Facilities
- Undeveloped City Properties
- Mill Creek City Limits
- Mill Creek Municipal Urban Growth Area (MUGA)

Park facilities are shown in the map in the Parks, Recreation, and Open Space element.





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# Future Needs for New and/or Expanded Capital Facilities

Based on the findings presented for the listed capital facilities, this section discusses the new and/or expanded capital facilities needed to alleviate identified deficiencies and meet the demands of future growth.

Every two years, the City prepares and adopts a six-year Capital Improvement Plan (CIP) identifying capital projects to be completed in this six-year timeframe. Funding sources are also identified during the CIP planning process.

## Parks and Recreation Facilities

As stated earlier, the City currently exceeds the Level of Service Standard for neighborhood parks. However, the area west of SR 527 and north of the Town Center does not have a neighborhood park in close proximity. The Mill Creek Sports Park does provide limited facilities such as the tot play equipment, picnic tables and restrooms, but additional Neighborhood Park elements may be needed. The city owned parcels to the north of the Mill Creek Sports Park may provide additional features and functions to accommodate the geographic need for additional neighborhood park functionality in this area.

To address the need for future additional facilities in both community and neighborhood parks, the City has implemented a mitigation program that requires an impact fee to be paid for new residential developments. The money collected with the park mitigation program is used to fund various capital projects that will improve facilities at existing parks, as well as construction of new parks in the future. Use of the park mitigation funds is allocated through the CIP process.

## Transportation Facilities

Although the City street system is currently operating at or above the adopted minimum Level of Service Standard, growth from future development in and around the City will impact the existing LOS. The Regionally Significant State Highways are currently operating below the Level of Service Guidelines in several locations. A listing of potential roadway capacity improvement projects is included in the Transportation element.

To address the traffic impacts from developments, the City has implemented a traffic mitigation program that requires a fee to be paid for each new trip generated on the major City streets. The City also has an Interlocal Agreement with Snohomish County to collect mitigation fees from County developments in the surrounding area that impact City streets. The money collected with the traffic mitigation program is used to fund various capital projects that will improve the operations, capacity, and safety of the affected roadways. Use of the traffic mitigation funds for specific capacity related projects is allocated through the Capital Improvement Plan process.

To protect the existing roadway infrastructure, the Transportation element also includes a Level of Service Guideline for a Pavement Management System to ensure the timely maintenance of the

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City's roads. Although not subject to concurrency, several projects implementing the Pavement Management System are funded within the six-year Capital Improvement Plan.

## Stormwater Management Facilities

The City's Surface Water Utility funds the maintenance of publicly owned drainage facilities, inspection of privately owned facilities, public education, and illegal discharge information actions. As part of the Capital Improvement Plan and biennium budget processes, capital project needs of the Surface Water Utility are evaluated, selected, and utility rates adjusted as necessary.

New developments are required to provide stormwater management facilities that comply with the requirements for Western Washington as established by the Washington State Department of Ecology Stormwater Management Manual currently adopted by the City of Mill Creek.

While not required to meet Level of Service Standards, various stormwater facility retrofit, repair, and improvement projects are programmed into the Capital Improvement Plan during the biennial update process.

## City Facilities

### CITY HALL

Improvements to the City Hall South and City Hall North buildings were completed in 2017 to provide the capacity for current City staff office needs. A purpose built Public Works Shop and Yard is required to safely and efficiently store and maintain equipment, materials, and supplies, and accommodate staff for Mill Creek's present size, with growth space planned if the City executes future annexations.

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## Financing Capital Facilities

Capital facilities are financed in a number of ways including real estate excise tax, mitigation fees, voluntary contributions or dedications, private development improvements, and grants. For example, transportation projects are usually funded with traffic mitigation fees, real-estate excise tax, and federal and state grants. Park and recreation facilities are generally funded through park mitigation fees, real estate excise tax, and recreation grants.

The City updates and adopts a six-year Capital Improvement Plan (CIP) every two years prior to the biennial budget. This plan identifies specific capital projects in the categories of Parks, Transportation, Stormwater, and City Facilities to be constructed over a six-year planning period. The CIP designates specific funding sources, including park and traffic impact mitigation fees, and is adopted as part of the Capital Facilities element by reference.

Budget constraints at the state and local level may impact the City's ability to construct planned capital facilities. As financing options become more limited, the City will have to prioritize capital facility projects through the CIP adoption process.

## Other Facilities/Services

In addition to the City-provided services addressed in this element, the City of Mill Creek and its Municipal Urban Growth Area are served by other public entities that construct or acquire capital facilities. These entities include:

- » Sno-Isle Library District (operating the Ralph W. and Winnifred B. Hammit Public Library)
- » Everett School District No. 2
- » South Snohomish County Regional Fire Authority
- » Snohomish County 911
- » Snohomish County Public Utilities District
- » Silver Lake Water & Sewer District
- » Alderwood Water & Wastewater District

The City has no direct control or authority over the entities listed above and cannot provide a detailed capacity and future needs analysis, or a financing plan for their future capital facilities. This being the case, water and sewer facilities are addressed in the Utilities element of the Comprehensive Plan, and a brief discussion of the services the other entities provide is discussed below. Refer to Comprehensive Plans for each of these entities for their current Capital Facilities plans.

### LIBRARY

The Ralph W. and Winnifred B. Hammit Public Library consists of a 7,370 square foot structure located on a 1.98 acre site at 15429 Bothell-Everett Highway. Although the library building is owned and maintained by the City, it is operated by Sno-Isle Libraries. In 2023, there were 187,811 visitors, 419,473 total checkouts and renewals, 6,209 library card registrations, 25,295 computer sessions, and 121,400 print jobs. There is an identified need for larger library facilities in the area, which is addressed in Sno-Isle Library's facilities plan. The current library building in Mill Creek is well-used and highly important to the community. As Mill Creek grows, there may be a need to expand this facility or pursue a new facility or facilities to serve increasing demand. The City of Mill Creek and Sno-Isle Libraries will coordinate and explore how needed library services can continue to support the Mill Creek community from the present into the future.

### EVERETT SCHOOL DISTRICT NO. 2

The City of Mill Creek is served by the Everett School District No. 2. The three facilities located within the City are Mill Creek Elementary School, Heatherwood Middle School, and Henry M. Jackson High School. Other schools are located just outside the city limits but serve Mill Creek residents.

According to the 2024-2029 Capital Facilities Plan prepared by the Everett School District, the OFM projections for 2044 indicate that total enrollment in the district will increase by 3,958 students to 23,578, an increase of 20.17 percent over the 2021 enrollment levels. Enrollment in 2044 is projected to be higher at all grade levels. To prepare for this future growth, the district will need to, depending on where the growth occurs, coordinate with local jurisdictions such as Mill Creek to identify facility expansions.

To meet identified needs, the City and the school district have entered into an interlocal agreement that enables the school district to levy development impact fees to mitigate the impacts of development on school facilities. These fees are used to develop new facilities and provide portable classrooms.



## **SOUTH COUNTY FIRE DISTRICT**

The City annexed into South Snohomish County Regional Fire Authority (SCF) in 2023. SCF provides fire protection, suppression and emergency medical services, and coordinates their Fire Marshal services closely with the City's Planning and Development Department. The majority of area in the City's MUGA that might be annexed is also served by SCF. Some areas in the MUGA to the east and south are served by Snohomish Regional Fire and Rescue.

SCF has fifteen stations including the station located at 1020 153rd Street SE (Station 76). This station is no more than four miles from the farthest point in the city and houses both a fire engine and an emergency medical service unit. The station is staffed 24/7 with five personnel, at least one of which is a paramedic.

## **SNOHOMISH COUNTY 911**

The City of Mill Creek was party to an interlocal agreement established in 1999 with Snohomish County Emergency Radio Systems (SERS), a public nonprofit corporation. The purpose of SERS was to provide and maintain an 800 megahertz emergency radio system serving cities within Snohomish County. The system was activated in 2005 and replaced the County's VHF system, which used older technology and could not be expanded.

The transfer from SERS to SNO911 in 2020 represents a significant transition in the management and operation of emergency communications in Snohomish County. SERS was responsible for the emergency radio communications for public safety agencies (law enforcement, fire departments, and emergency medical services) for many years. However, as the demands of modern emergency response grew, so did the need for an updated, integrated system.

The establishment of SNO911 aims to enhance emergency response capabilities by improving communication technologies, streamlining processes, and ensuring more efficient dispatch services. SNO911 encompasses not just radio communications but also other emergency management technologies. By enhancing interoperability, improving coverage, and ensuring more reliable communications, SNO911 established a new framework for emergency response in Snohomish County.

# City of Mill Creek 2024 Vision Survey

Monday, May 20, 2024

**107**

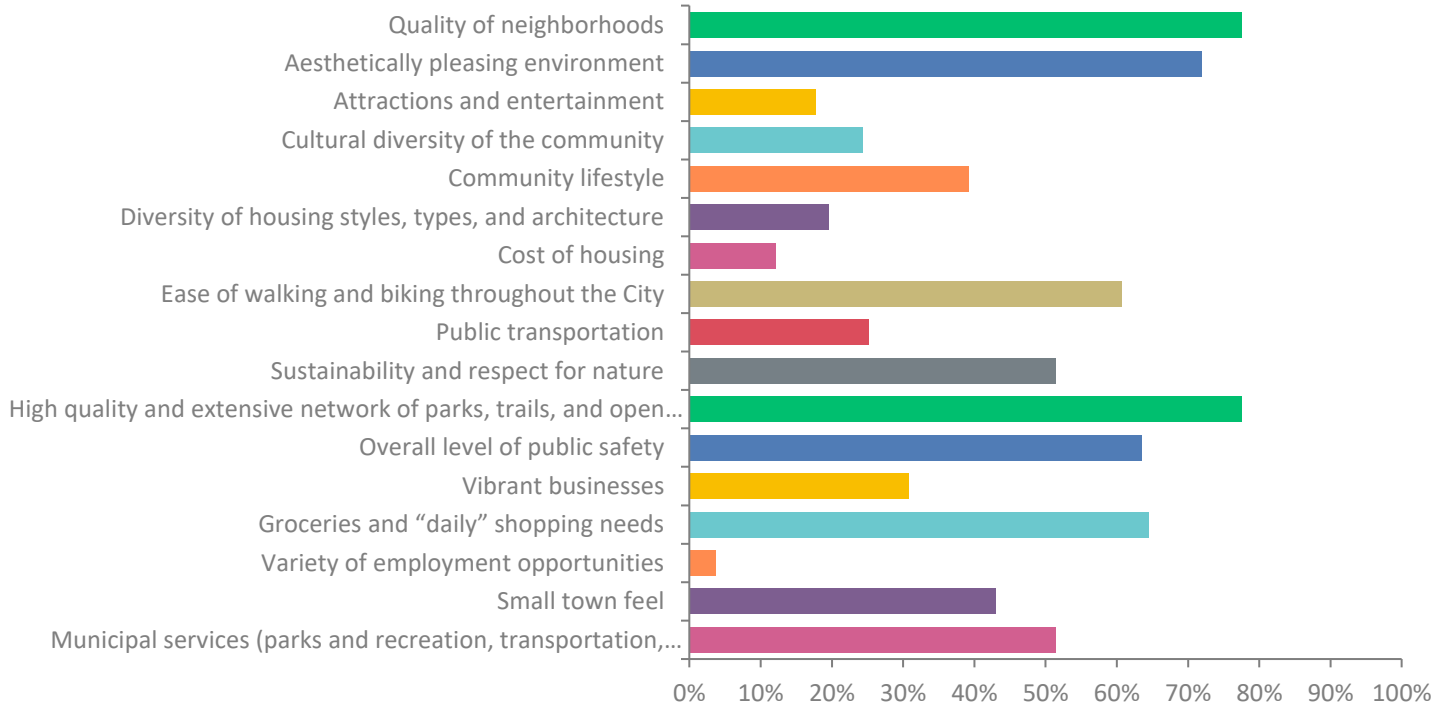
Total Responses

Date Created: Friday, February 16, 2024

Complete Responses: 107

# best contribute to the quality of life in Mill Creek today. Please mark all that apply.

Answered: 107 Skipped: 0



# best contribute to the quality of life in Mill Creek today. Please mark all that apply.

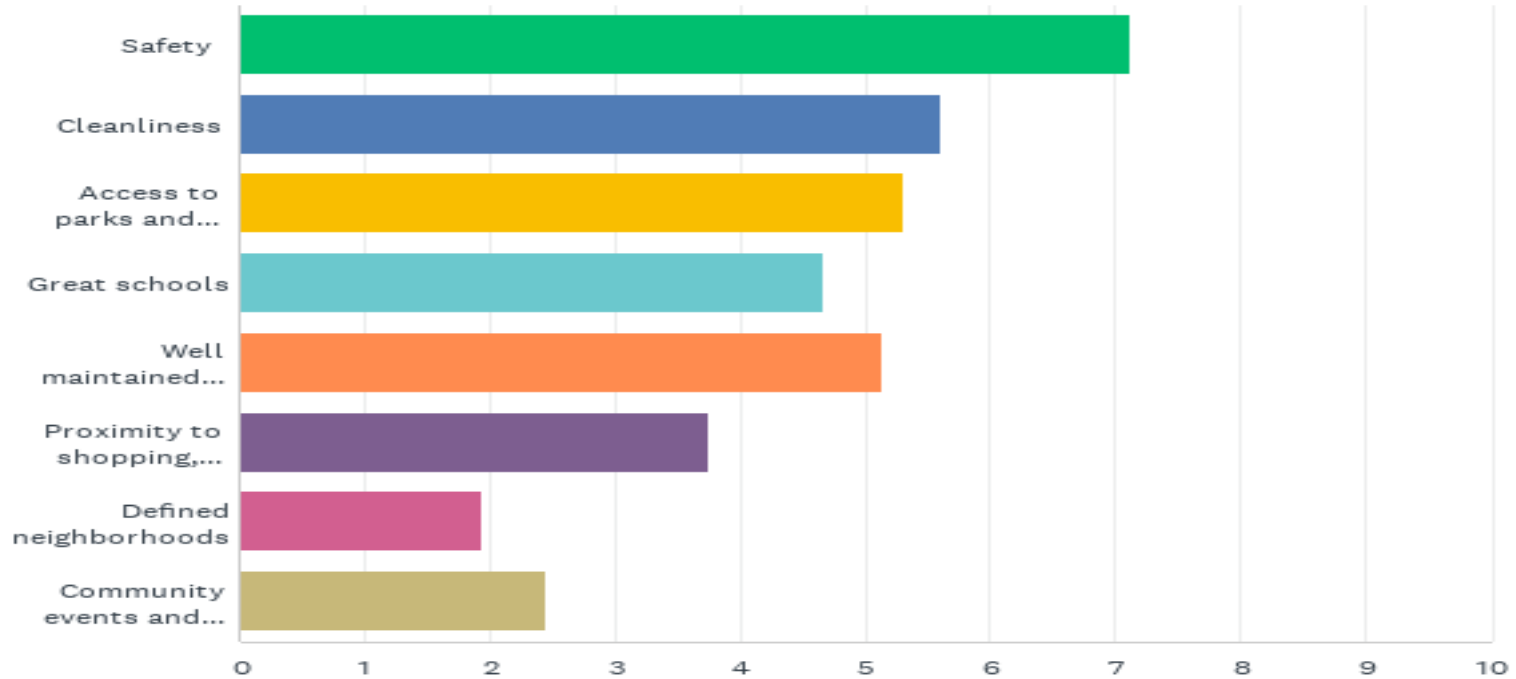
Answered: 107 Skipped: 0

ANSWER CHOICES	RESPONSES	
Quality of neighborhoods	77.57%	83
Aesthetically pleasing environment	71.96%	77
Attractions and entertainment	17.76%	19
Cultural diversity of the community	24.30%	26
Community lifestyle	39.25%	42
Diversity of housing styles, types, and architecture	19.63%	21
Cost of housing	12.15%	13
Ease of walking and biking throughout the City	60.75%	65
Public transportation	25.23%	27



### Q3: What's most important to you as you think about Mill Creek in 20 years? Rank your top 3.

Answered: 105 Skipped: 2



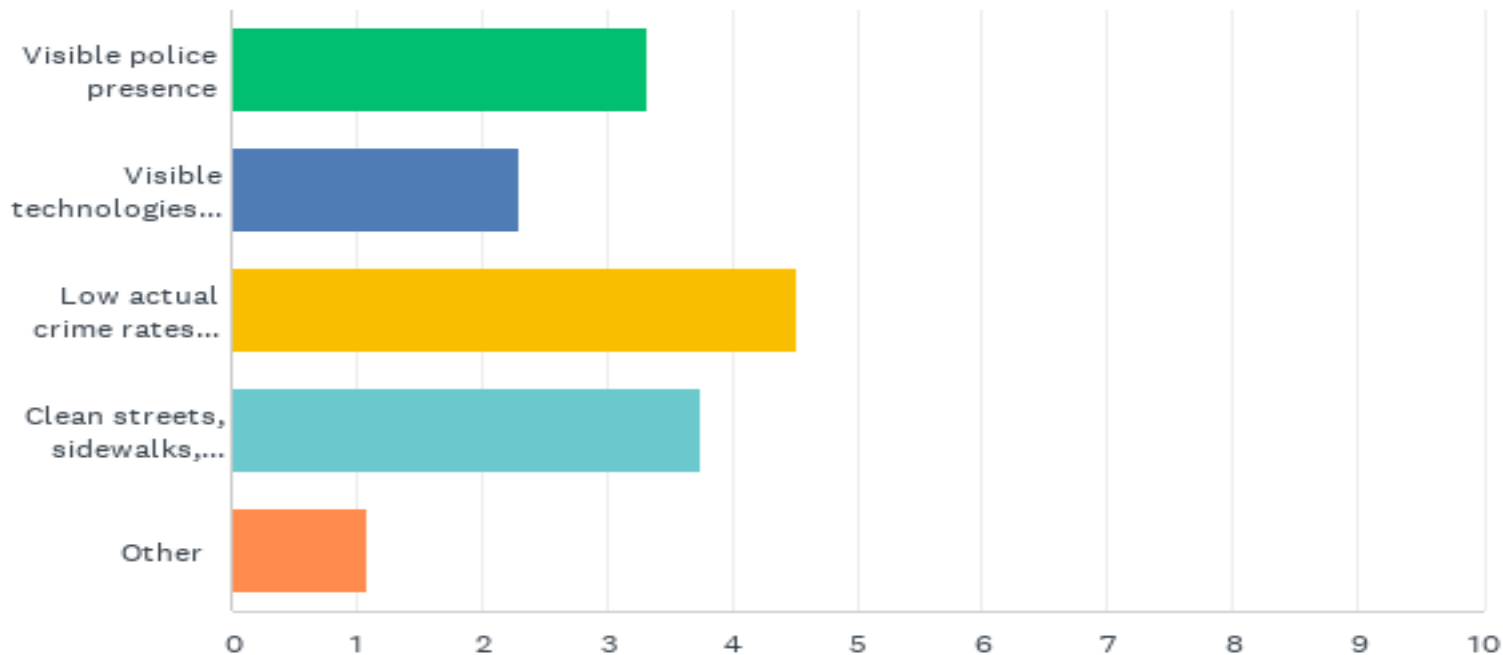
# Q3: What's most important to you as you think about Mill Creek in 20 years? Rank your top 3.

Answered: 105 Skipped: 2

	1	2	3	4	5	6	7	8	TOTAL	SCORE
Safety	63.81% 67	11.43% 12	7.62% 8	10.48% 11	4.76% 5	1.90% 2	0.00% 0	0.00% 0	105	7.13
Cleanliness	5.71% 6	34.29% 36	12.38% 13	24.76% 26	9.52% 10	12.38% 13	0.95% 1	0.00% 0	105	5.61
Access to parks and trails	10.48% 11	8.57% 9	30.48% 32	18.10% 19	17.14% 18	13.33% 14	1.90% 2	0.00% 0	105	5.30
Great schools	8.57% 9	15.24% 16	6.67% 7	18.10% 19	21.90% 23	18.10% 19	6.67% 7	4.76% 5	105	4.66
Well maintained roads, sidewalks, and public spaces	5.71% 6	15.24% 16	25.71% 27	13.33% 14	26.67% 28	7.62% 8	5.71% 6	0.00% 0	105	5.14
Proximity to shopping, dining, and retail	3.81% 4	7.62% 8	11.43% 12	6.67% 7	7.62% 8	39.05% 41	18.10% 19	5.71% 6	105	3.75
Defined neighborhoods	0.00% 0	0.95% 1	2.86% 3	0.95% 1	3.81% 4	3.81% 4	52.38% 55	35.24% 37	105	1.95
Community events and gathering places	1.90% 2	6.67% 7	2.86% 3	7.62% 8	8.57% 9	3.81% 4	14.29% 15	54.29% 57	105	2.46

# Q4: When you think about the safety of Mill Creek as a city, what does that mean to you? Rank in order of importance.

Answered: 103 Skipped: 4



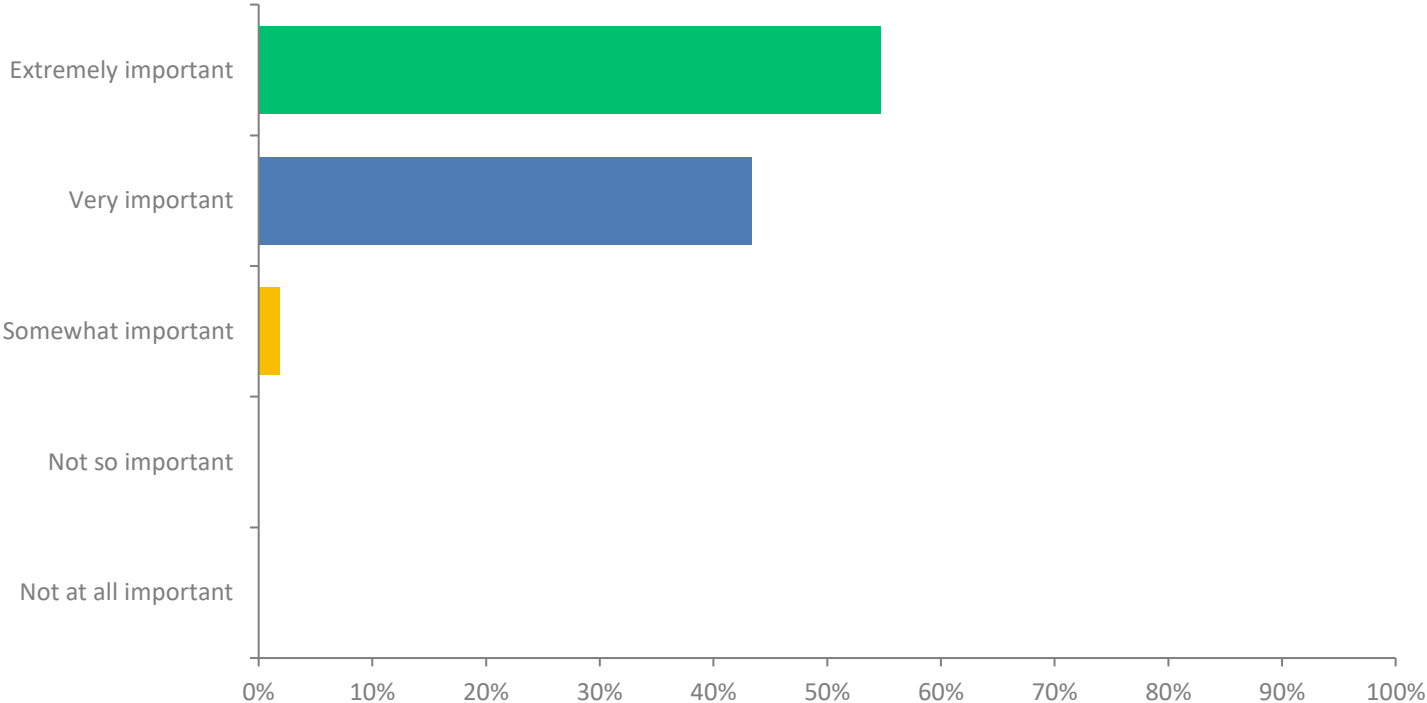
## Q4: When you think about the safety of Mill Creek as a city, what does that mean to you? Rank in order of importance.

Answered: 103 Skipped: 4

	1	2	3	4	5	TOTAL	SCORE
Visible police presence	13.59% 14	21.36% 22	49.51% 51	14.56% 15	0.97% 1	103	3.32
Visible technologies, like cameras	1.94% 2	3.88% 4	23.30% 24	65.05% 67	5.83% 6	103	2.31
Low actual crime rates (both serious crimes and property crimes)	64.08% 66	26.21% 27	7.77% 8	1.94% 2	0.00% 0	103	4.52
Clean streets, sidewalks, parks, trails, and public spaces (e.g. no graffiti, no homeless camps, etc.)	20.39% 21	48.54% 50	17.48% 18	13.59% 14	0.00% 0	103	3.76
Other	0.00% 0	0.00% 0	1.94% 2	4.85% 5	93.20% 96	103	1.09

# Q5: How important is it to you that our public spaces (e.g. streets, sidewalks, medians, parks, trails) are well maintained and kept clean?

Answered: 106 Skipped: 1



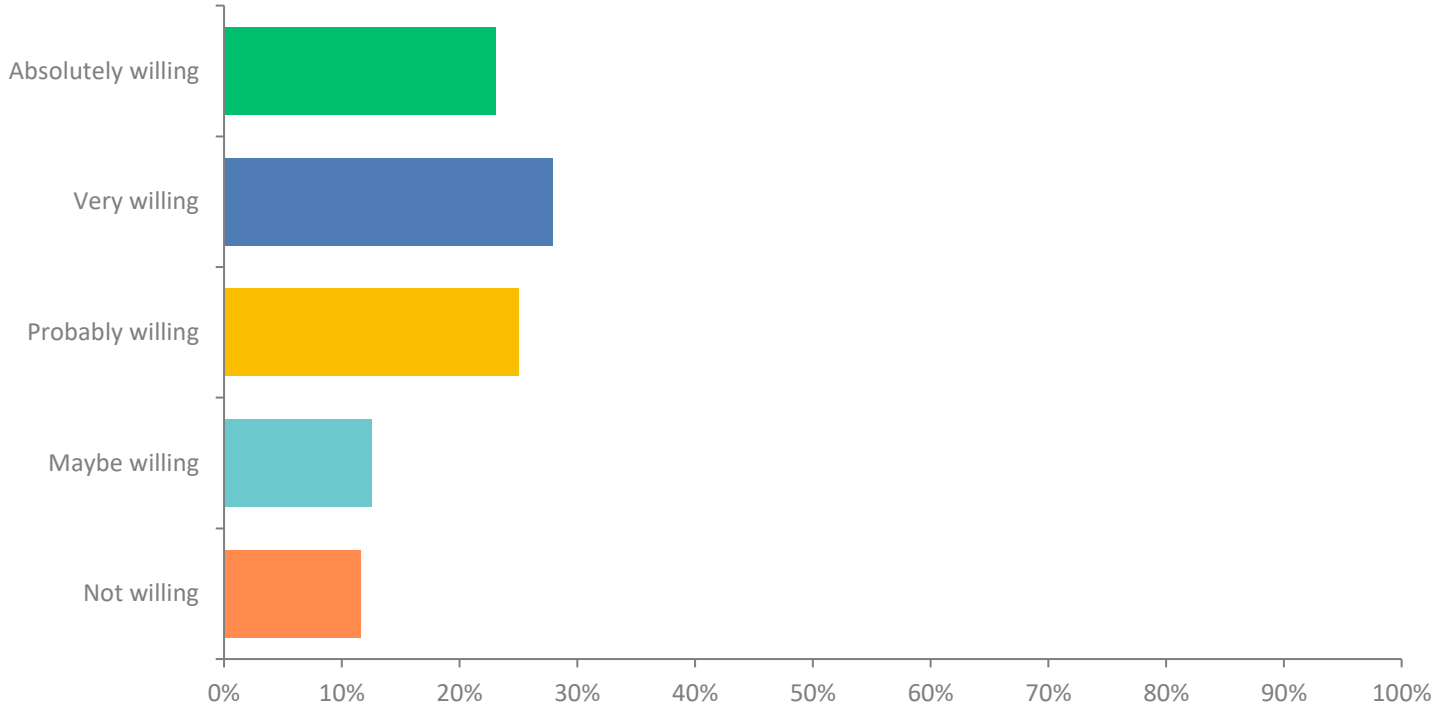
## Q5: How important is it to you that our public spaces (e.g. streets, sidewalks, medians, parks, trails) are well maintained and kept clean?

Answered: 106 Skipped: 1

ANSWER CHOICES	RESPONSES	
Extremely important	54.72%	58
Very important	43.40%	46
Somewhat important	1.89%	2
Not so important	0%	0
Not at all important	0%	0
TOTAL		106

# keep our public spaces clean (e.g. streets, sidewalks, medians, parks, trails)?

Answered: 104 Skipped: 3



# keep our public spaces clean (e.g. streets, sidewalks, medians, parks, trails)?

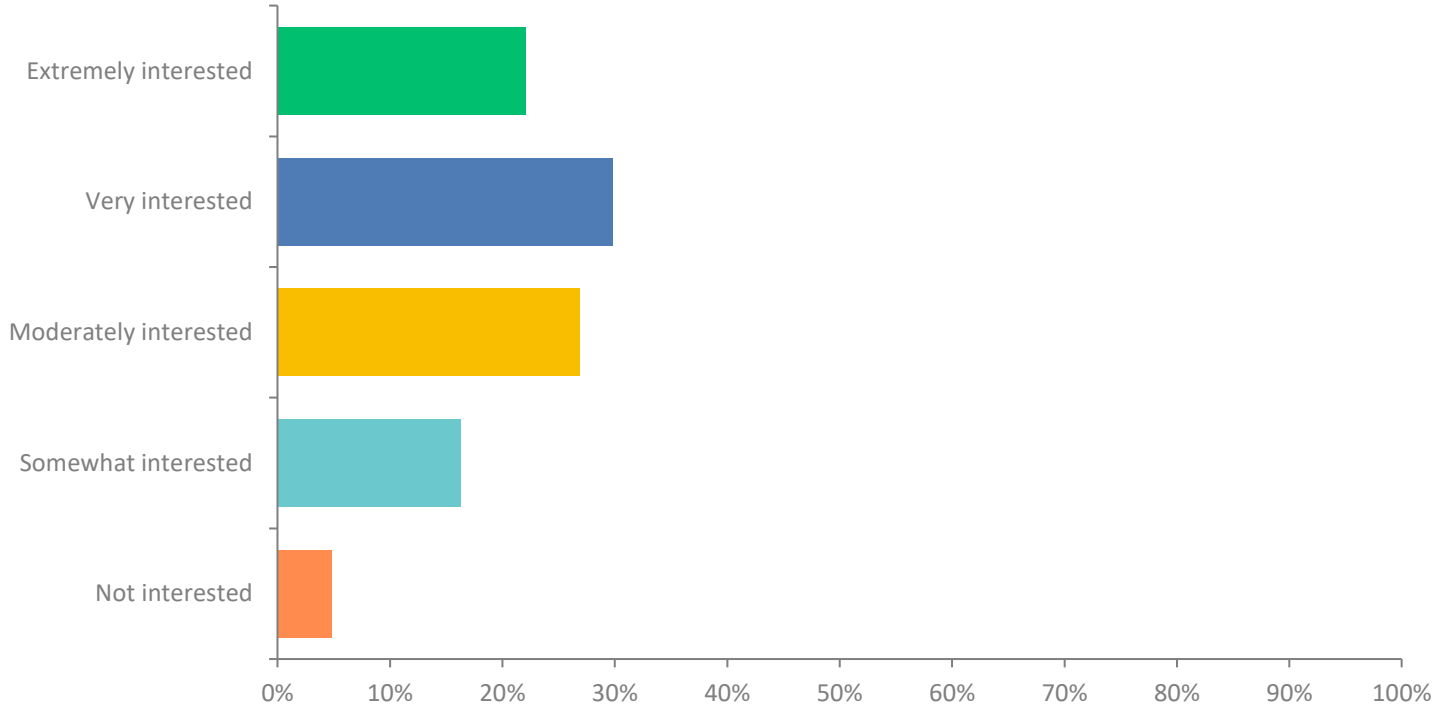
Answered: 104 Skipped: 3

ANSWER CHOICES	RESPONSES	
Absolutely willing	23.08%	24
Very willing	27.88%	29
Probably willing	25.00%	26
Maybe willing	12.50%	13
Not willing	11.54%	12
TOTAL		104



# attending community events, volunteering, getting involved with your local school or homeowner's association, etc.?

Answered: 104 Skipped: 3



# attending community events, volunteering, getting involved with your local school or homeowner's association, etc.?

Answered: 104 Skipped: 3

ANSWER CHOICES	RESPONSES	
Extremely interested	22.12%	23
Very interested	29.81%	31
Moderately interested	26.92%	28
Somewhat interested	16.35%	17
Not interested	4.81%	5
TOTAL		104

# Q8: If you are interested in getting involved, what activities would you most likely participate in? Please mark all that apply.

Answered: 101 Skipped: 6



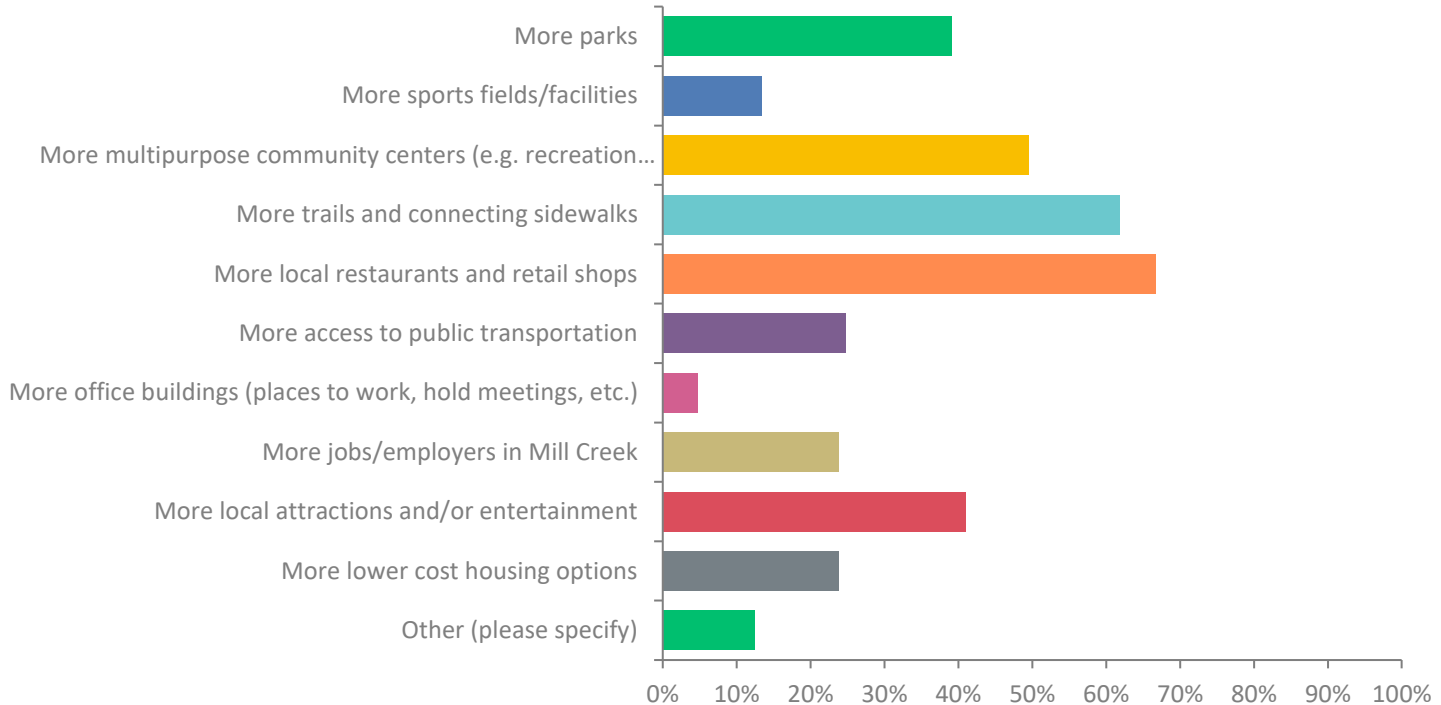
## Q8: If you are interested in getting involved, what activities would you most likely participate in? Please mark all that apply.

Answered: 101 Skipped: 6

ANSWER CHOICES	RESPONSES	
Focus group workshop	41.58%	42
Pop-up information sharing and listening events in the community	27.72%	28
Interactive online engagement activities (polls, flash surveys, mapping exercises)	59.41%	60
Virtual meeting/webinar	41.58%	42
In-person meetings	38.61%	39
Community led events	61.39%	62
Please suggest ideas or locations for pop up events, community gathering, or other opportunities	13.86%	14

# Q9: Of the following, what would you be most interested in seeing more of in Mill Creek in the next 20 years? Choose up to 5

Answered: 105 Skipped: 2



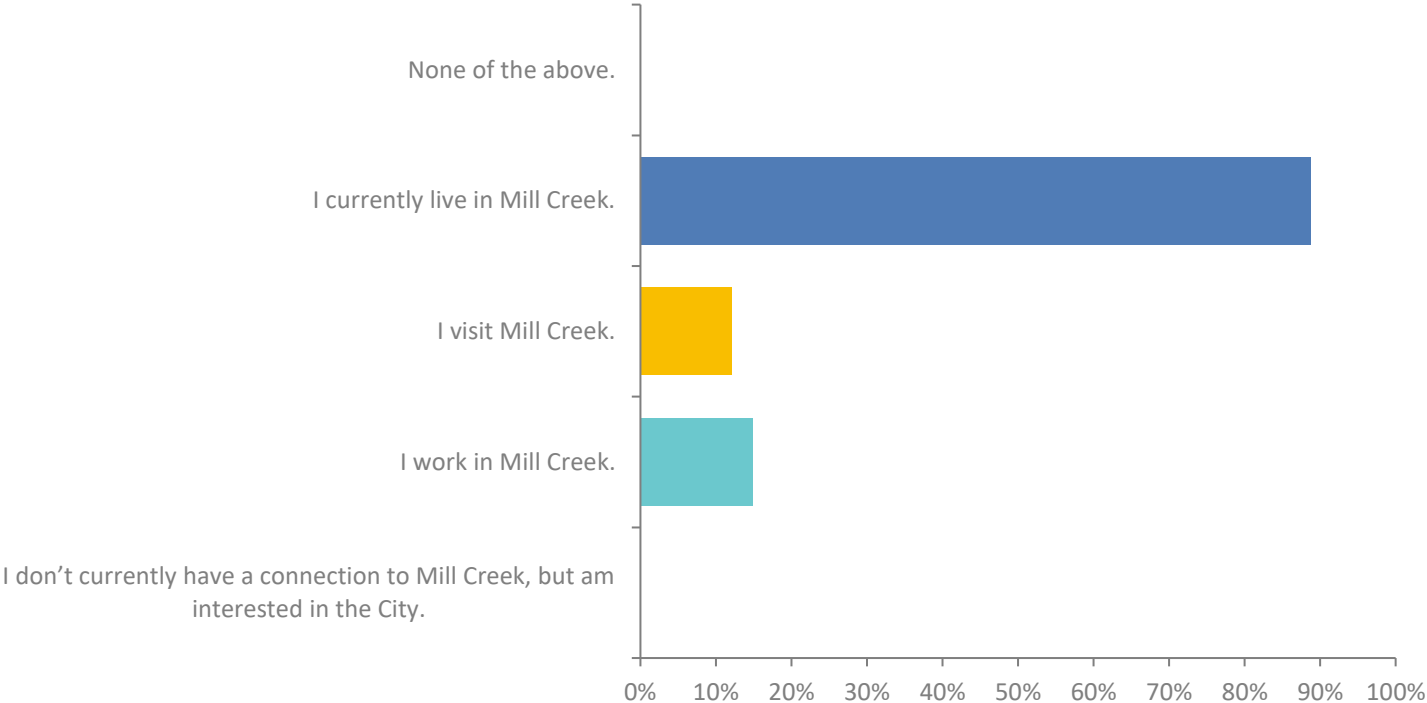
# Q9: Of the following, what would you be most interested in seeing more of in Mill Creek in the next 20 years? Choose up to 5

Answered: 105 Skipped: 2

ANSWER CHOICES	RESPONSES	
More parks	39.05%	41
More sports fields/facilities	13.33%	14
More multipurpose community centers (e.g. recreation centers, arts, community meetings, classes, etc.)	49.52%	52
More trails and connecting sidewalks	61.90%	65
More local restaurants and retail shops	66.67%	70
More access to public transportation	24.76%	26
More office buildings (places to work, hold meetings, etc.)	4.76%	5

# Q11: What is your connection to Mill Creek? Please mark all that apply.

Answered: 107 Skipped: 0



# Q11: What is your connection to Mill Creek? Please mark all that apply.

Answered: 107 Skipped: 0

ANSWER CHOICES	RESPONSES	
None of the above.	0%	0
I currently live in Mill Creek.	88.79%	95
I visit Mill Creek.	12.15%	13
I work in Mill Creek.	14.95%	16
I don't currently have a connection to Mill Creek, but am interested in the City.	0%	0
<b>TOTAL</b>		<b>124</b>



# City of Mill Creek – Middle Housing Menu of Options Report



Prepared by LDC Inc.

June 22, 2023

## MIDDLE HOUSING MENU OF OPTIONS REPORT OVERVIEW AND PURPOSE

In 2022, the City of Mill Creek received a Middle Housing grant from the Washington State Department of Commerce. The grant program was authorized supplemental state operating budget and was developed to support the adoption of ordinances authorizing middle housing types, along with conducting a racial equity and displacement report. The intent is for cities to study their existing housing conditions, plan for a greater variety of housing types, and identify any communities that may be at risk of racial discrimination or displacement.

The Middle Housing Menu of Options report builds off the Racial Equity and Displacement Analysis Report and community engagement completed as part of this project. The City of Mill Creek is not obligated to take any of the actions proposed in this report. However, this report should provide the City with great ideas and tools it can consider as part of the 2024 Comprehensive Plan update.



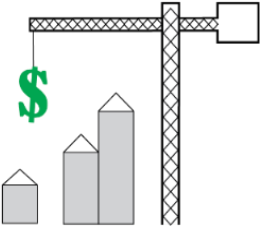
The purpose of this report is to analyze the City of Mill Creek Code to develop a menu of strategies and implementing actions the City could take to support more middle housing, affordable housing options, and proactively address residential and business displacement. This includes recommendations for changes to current policies, regulations and zoning, fee structures, housing incentives, and permitting procedures and processes. Considering these options in parallel with policy recommendations outlined in previous reports would also have the benefit of addressing housing exclusion.






North Pointe Park – Mill Creek

## HOUSING STRATEGIES AND ACTIONS

The report outlines a collection of strategies and actions that would support more middle housing options and/or proactively address residential and business displacement. For each strategy, there are one or more identified actions. A complete write-up on each action is provided within this report.

Primary Housing Strategy	Description	Housing Actions
<p>New state laws focused on middle housing</p> 	<p>New legislation requires the City to allow at least two accessory dwelling units on all lots within residential zones in most circumstances (HB 1337). The City will also be required to allow at least two residential unit on all single family lots (HB 1110).</p>	<ul style="list-style-type: none"> <li>• <a href="#">Implement House Bill 1337</a></li> <li>• <a href="#">Implement House Bill 1110</a></li> </ul>
<p>Encourage a wide variety of middle housing options</p> 	<p>Focuses on different options the City could take on to encourage more middle housing in Mill Creek. This could include reviewing current densities allowed in residential zones for possible adjustments and modifying existing middle housing definitions which would allow the City to modify the housing types that are permitted in various zones.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Adjust densities in existing residential zones</a></li> <li>• <a href="#">Middle housing definitions and uses</a></li> </ul>
<p>Incentivize new housing</p> 	<p>Focuses on a range of options to incentivize housing that is more affordable. Options could include inclusionary zoning, use of the Multi-Family Tax Exemption (MFTE), and density incentives tied to affordability.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Inclusionary zoning requirements or voluntary incentives for new development</a></li> <li>• <a href="#">Adopt Multi Family Tax Exemption (MFTE) Program</a></li> <li>• <a href="#">Density incentives in the LDR Low Density Residential zone</a></li> </ul>
<p>Improve the regulatory environment for permits</p>	<p>Focuses on creating a smooth regulatory process for obtaining approvals on development proposals will incentivize development in the city.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Permit review process incentives for affordable housing</a></li> </ul>

		
<p>Bring down the cost of development</p> 	<p>Focuses on fee waivers or reductions which could incentivize building new affordable units.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Fee waivers or reductions for affordable housing</a></li> </ul>
<p>Prevent and mitigate displacement</p> 	<p>Focuses high level options the City could consider in the future to limit displacement occurring via the high cost of rents. This strategy also addresses displacement of businesses as redevelopment occurs and proactive measures the City could consider.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Tenant protections</a></li> <li>• <a href="#">Business displacement</a></li> </ul>



Country Club Village Condominiums – Mill Creek

## HOUSING ACTIONS

The following actions are options to be considered to implement the housing strategies. For each proposed action, a description of the action is provided followed by a table outlining:

- ✓ Existing policy or policies that support the action.
- ✓ Suggested policy or policies to consider to support the action.
- ✓ High level understanding of how much this proposed action might get utilized (Low, Moderate, or High).
- ✓ Target Group and possible area(s) of applicability.
- ✓ If the action provides an option to assist with meeting the new Housing Element requirements associated with the 2024 Comprehensive Plan update.
- ✓ If the action provides an option to assist with meeting any new housing targets associated with the 2024 Comprehensive Plan.
- ✓ Jurisdictions that have taken the same or similar actions and additional resources to consider.
- ✓ Possible advantages and disadvantages of taking the action.

### House Bill 1337 – Accessory Dwelling Units

House Bill 1337 passed during the 2023 legislative session. It is an act relating to expanding housing options by easing barriers to the construction and use of accessory dwelling units (ADUs). The Department of Commerce has prepared Draft Guidance, which may also be helpful as implementation of the bill takes place. The provisions of this bill must be implemented by the City no later than June 30, 2025 (six months after the comprehensive plan update deadline). The bill states that if a city or county does not amend their rules to be consistent with the law, the rules "supersede, preempt and invalidate any conflicting local development regulations.

It may be advantageous to consider implementing these requirements as part of the 2024 comprehensive plan update. Completing this concurrently with the update would allow the City to assess these new requirements in tandem with the process to plan for growth out to 2044. This includes the impact of this action on meeting housing targets, impacts to capital facilities, and inclusion of these new requirements as community engagement occurs

Combining the processes would also create efficiencies such as consolidating SEPA review into one process (instead of separate processes).

The following summarizes the bill requirements as they pertain to the City of Mill Creek. The full bill report may be found [here](#).

- ✓ Impact fees may not exceed 50% of those that would be levied on a single-family home.
- ✓ The owner of a lot on which there is an ADU is not required to reside in or occupy the ADU or another housing unit on the same lot.
- ✓ Must allow at least two ADUs on all lots that allow for single-family homes in the following configurations:
  - one attached ADU and one detached ADU

- two attached ADUs
- two detached ADUs
- ✓ Must allow an ADU on any lot that meets the minimum lot size required for the principal unit.
- ✓ May not establish a maximum gross floor area requirement for ADUs that is less than 1,000 square feet or roof height limits of less than 24 feet, unless the height limit on the principal unit is less than 24 feet.
- ✓ Setback requirements, yard coverage limits, tree retention mandates, restrictions on entry door locations, aesthetic requirements, or requirements for design review for ADUs cannot be more restrictive than those for principal units.
- ✓ Must allow detached ADUs to be sited at a lot line if the lot line abuts a public alley, unless the city or county routinely plows snow on the public alley.
- ✓ Must allow ADUs to be converted from existing structures, including detached garages.
- ✓ May not prohibit the sale of a condominium unit independently of a principal unit solely on the grounds that the condominium unit was originally built as an ADU.
- ✓ May not require public street improvements as a condition of permitting ADUs.
- ✓ May restrict the use of ADUs for short term rentals.
- ✓ Declarations or governing documents governing condominiums, homeowners' associations, and common interest communities created after the effective date of the act may not prohibit the construction, development, or use of an ADU unless certain conditions are met.

Implementation of these requirements is exempt from both the State Environmental Policy Act (SEPA) and Growth Management Act (GMA) appeals. In addition, the bill limits new parking for ADUs, provides exemptions for lots with critical areas, and outlines additional circumstances where the City could limit applicability of the legislation.

The City of Mill Creek currently has ADU regulations located in MCC 17.22.130. ADUs are allowed as secondary uses in the PRD 7200, LDR, and MDR zones. Secondary uses are defined as "...a use, subordinate to the primary use, which may exist only when a primary use is existing on the same lot. The floor area of a secondary use must be less than that devoted to the primary use." (MCC 14.01)

There will be some code changes required to implement HB 1337 and others that the City will need to consider as the new provisions are developed. The City of Mill Creek currently regulates ADUs under MCC 17.22.130. This code will need to be amended to:

- ✓ Allow ADUs to be at least 1,000 square feet in size. The current code allows units to be between 400-800 square feet.
- ✓ Address allowed heights of at least 24 feet (unless the height limit on the principal unit is less than 24 feet).
- ✓ Add that two may be permitted on a lot.
- ✓ Remove owner occupancy requirements.
- ✓ Remove requirement that ADU only be 30% of the gross floor area of the main home.

In addition, the City will have to determine the approach to building setbacks, impervious surfaces, and other bulk standard requirements which could promote or make ADUs very


difficult to build. Currently, the City also has stricter locational requirements (such as setbacks) for ADUs than accessory buildings. The City should consider applying the same lot standards. To protect the privacy of neighbors, standards could be developed to location of doors and windows, for example.

<p><b>Existing policy or policies that support action</b></p>	<p>HOUSING GOAL 1: Plan for affordable housing opportunities for all economic segments of the community.</p> <p>HOUSING GOAL 2: Plan for a wide variety of housing choices to accommodate all of the needs of the Mill Creek community.</p> <p>RESIDENTIAL DEVELOPMENT GOAL 3: Ensure that residential development occurs within a range of densities that preserves the existing housing stock, is compatible with surrounding land uses, and provides for a variety of housing types.</p> <p>RESIDENTIAL POLICY 1.01: Maintain the residential character of the City by providing a range of residential densities while maintaining and enhancing the City as a predominantly single-family residential community.</p> <p>HOUSING POLICY 1.01 Work with the development community to encourage affordable housing within the City.</p> <p>HOUSING POLICY 1.04 Pursue strategies that encourage a variety of housing choices to be developed. Examples of the types of housing that will be considered are accessory dwelling units, congregate care facilities, retirement homes, mixed-use development, multifamily complexes, inclusionary zoning, manufactured housing and homesharing.</p> <p>HOUSING POLICY 1.05 Strive to accommodate the special needs of various segments of the community including the elderly, developmentally disabled, physically handicapped and others with housing needs. Support the principle that fair and equal access to housing is available to all persons regardless of race, color, religion, gender, sexual orientation, age, national origin, familial status, source of income, or disability.</p> <p>HOUSING STRATEGY 2: As a part of the implementation of the Comprehensive Plan, continue to consider zoning</p>
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	<p>mechanisms and development standards that can increase density in appropriate areas. These mechanisms include compact development, minimum densities for selected residential zone districts, planned residential development, zero lot line development and density bonuses for up-zoning. Most of these mechanisms are available in the City’s development regulations and have been used in the SR 527 Corridor Subarea, as well as other areas in the City.</p> <p>HOUSING STRATEGY 3: Continue to include provisions in the zoning code to implement strategies that encourage affordable housing and provide housing for special needs populations such as mixed-use development, congregate care facilities, retirement homes, accessory dwelling units and inclusionary zoning.</p>
<p><b>Suggested policy to consider to support action</b></p>	<p>The City should consider one or more focused policies on ADUs that align with the approach to implementing HB 1337. This includes the goals and outcomes the City is seeking with the greater allowance of ADUs in the City (such as providing more housing options for people who wish to downsize or greater opportunities for homeownership).</p> <p>As outlined in the Racial Equity and Displacement Analysis report, there are also current policies which send mixed messages about the approach towards infill development. As part of the update, it is suggested that the City look at housing policies in totality, so it is clear about how the City is approaching housing policy, including development of ADUs.</p>
<p><b>High level understanding of how much this proposed action might get utilized (Low, Moderate, or High)</b></p>	<p>Moderate. Although Mill Creek already allows ADUs, HB 1337 will increase options for additional ADUs in the city. The impact of this action will depend on how the City approaches implementing the bill. Also note, that the City has many residential communities which have Codes, Covenants, and Restrictions (CCRs) which bar ADU development. This legislation does not supersede existing CCRs.</p>
<p><b>Target Group and Possible area(s) of applicability</b></p>	<p>Moderate income households in all residential zones.</p>



<p><b>Could this action provide an option to assist with meeting the new Housing Element requirements associated with the 2024 Comprehensive Plan update?</b></p>	<p>No. The city already allows ADUs.</p>
<p><b>Could this action provide an option to assist with meeting any new housing targets associated with the 2024 Comprehensive Plan?</b></p>	<p>Yes. The City could allocate some housing capacity to ADUs. It would be important to develop a methodology to help support the number of ADU units the City expects during the planning period. A methodology could look like:</p> <ul style="list-style-type: none"> <li>• Calculating the total number of lots these provisions would apply to.</li> <li>• Remove lots with critical areas.</li> <li>• Remove a certain percentage of lots where there may be Codes, Covenants, and Restrictions (CCR), which would limit ADUs from being built, small lots where attached or detached may not be possible, and other limitations that may apply based on the regulations in place.</li> <li>• Consider how the City will apply these new requirements. As an example, if a zone has a 25-foot rear setback for homes and most homes are built close to the setback line you would see fewer ADUs (internal ADUs could still be built). If you amend the zoning to allow ADUs at 5 feet (as is allowed for Accessory Buildings), you will see more. Choose a reasonable deduction when applying for this. It does not have to be perfect and over time you will have more data to apply.</li> <li>• This will then give you a reduced number of lots where one or two ADUs could be built. You could then apply a reasonable standard like one ADU will be built per five lots (given 10 would be allowed) during the planning period.</li> <li>• The last step would be applying the ADU capacity to one or more income bands.</li> </ul>
<p><b>Cities that have taken the same or similar actions and additional resources to consider</b></p>	<p>Given this is a new set of requirements, all jurisdictions will be working to implement it over the next several years. However, some jurisdictions have current regulations which are like those required under HB 1337.</p> <p>Two ADUs on one lot:</p>

	<ul style="list-style-type: none"> <li>✓ <u>Black Diamond Municipal Code Sec. 18.56.030</u> – Allows two ADUs in conjunction with the primary unit provided adequate provisions for water and sewer are met.</li> <li>✓ <u>Burien Municipal Code Sec. 19.17.070</u> – Permits a maximum of two ADUs (one attached and one detached) per detached house.</li> <li>✓ <u>Langley Municipal Code Sec. 18.08.095</u> – Allows one attached and one detached ADU on a lot with a single-family dwelling connected to sewer.</li> </ul> <p>Allowance for ADUs on small lots:</p> <ul style="list-style-type: none"> <li>✓ <u>Enumclaw Municipal Code Sec. 19.34.050</u> – Allows ADUs on lots of any size.</li> <li>✓ <u>Kenmore Municipal Code Sec. 18.73.100</u> – Does not require a minimum lot size for ADUs.</li> <li>✓ <u>Renton Municipal Code Sec. 4-2-110C</u> – Permits ADUs on lots 3,000 square feet or less.</li> </ul>
<b>Advantages</b>	<ul style="list-style-type: none"> <li>✓ Not applicable as the City has not yet developed an approach for implementing this bill. Once an approach is taken, advantages and disadvantages could be developed.</li> </ul>
<b>Disadvantages</b>	<ul style="list-style-type: none"> <li>✓ See above</li> </ul>
<b>Strategies implemented</b>	<p>New state laws focused on middle housing</p> 

## Implement House Bill 1110 – Middle Housing

House Bill 1110 passed during the 2023 legislative session. It is an act relating to increasing middle housing in areas traditionally dedicated to single-family detached housing. Middle housing, also commonly referred to as “Missing Middle Housing,” is defined as duplexes, triplexes, fourplexes, fiveplexes, sixplexes, townhouses, courtyard apartments, cottage housing, and stacked flats. It is referred to as “missing middle” because demand for this type of housing has strongly outpaced supply in most communities. Middle housing is typically more affordable than single family detached or mid/high rise housing.



The Washington Department of Commerce has developed a [Fact Sheet](#), which may aid the City of Mill Creek during implementation. It is expected that additional guidance will be provided by the state over the coming months. This includes any funding that might be available to implement these new requirements.

The provisions of this bill must be implemented by the City no later than June 30, 2025. The following summarizes the bill requirements as they pertain to the City of Mill Creek. The full bill requirements may be found [here](#).

- ✓ Must allow at least two units per lot in residential zones.
- ✓ Requirements do not apply to lots designated as critical areas (including buffers), watershed serving a reservoir for potable water if that watershed is listed as impaired or threatened under the federal Clean Water Act, or lots that have been designated urban separators by countywide planning policies.
- ✓ An alternative implementation process allows the City of Mill Creek to implement the density requirements on 75% of lots dedicated to single-family detached housing units when certain conditions are met.
- ✓ The bill provides options for extensions to implement the bill requirements when certain conditions are met.
- ✓ A city must allow at least six of the nine types of middle housing and may allow ADUs to achieve the minimum density requirements. **Note that implementation of HB 1337 would assist in meeting this requirement.**

*NOTE: Currently, the City of Mill Creek allows ADUs and Townhouses or single-family attached dwellings in the PRD 7200, LDR, and MDR zones. [MCC 14.01](#) defines a Townhome as “...a multiple dwelling unit meeting the following criteria: (1) no dwelling unit*

*overlapping another vertically; (2) common side walls joining units; and (3) not more than six dwelling units in one structure.”*

*Essentially, this means that the City of Mill Creek already allows duplexes, triplexes, fourplexes, fiveplexes, sixplexes, and ADUs in all the residential zones primarily dedicated to single family detached housing. Together, this would account for six of the nine middle housing types.*

In addition, the middle housing requirements:

- ✓ May only apply administrative design review for middle housing.
- ✓ May not require standards for middle housing that are more restrictive than those required for detached single-family residences.
- ✓ Must apply to middle housing the same development permit and environmental review processes that apply to detached single-family residences, unless otherwise required by state law.
- ✓ Are not required to be applied to lots less than 1,000 square feet in size.
- ✓ Must also allow zero lot line short subdivisions where the number of lots created is equal to the unit density required.
- ✓ May not require off-street parking as a condition of permitting development of middle housing within 0.5 miles walking distance of a major transit stop.
- ✓ May not require more than one off-street parking space per unit as a condition of permitting development of middle housing on lots smaller than 6,000 square feet (before subdividing)
- ✓ May not require more than two off-street parking spaces per unit as a condition of permitting development of middle housing on lots greater than 6,000 square feet (before subdividing).

**Existing policy or policies that support action**


HOUSING GOAL 1: Plan for affordable housing opportunities for all economic segments of the community.

HOUSING GOAL 2: Plan for a wide variety of housing choices to accommodate all of the needs of the Mill Creek community.

RESIDENTIAL DEVELOPMENT GOAL 3: Ensure that residential development occurs within a range of densities that preserves the existing housing stock, is compatible with surrounding land uses, and provides for a variety of housing types.

RESIDENTIAL POLICY 1.01: Maintain the residential character of the City by providing a range of residential densities while maintaining and enhancing the City as a predominantly single-family residential community.

	<p>HOUSING POLICY 1.01 Work with the development community to encourage affordable housing within the City.</p> <p>HOUSING POLICY 1.04 Pursue strategies that encourage a variety of housing choices to be developed. Examples of the types of housing that will be considered are accessory dwelling units, congregate care facilities, retirement homes, mixed-use development, multifamily complexes, inclusionary zoning, manufactured housing and homesharing.</p> <p>HOUSING POLICY 1.05 Strive to accommodate the special needs of various segments of the community including the elderly, developmentally disabled, physically handicapped and others with housing needs. Support the principle that fair and equal access to housing is available to all persons regardless of race, color, religion, gender, sexual orientation, age, national origin, familial status, source of income, or disability.</p> <p>HOUSING STRATEGY 2: As a part of the implementation of the Comprehensive Plan, continue to consider zoning mechanisms and development standards that can increase density in appropriate areas. These mechanisms include compact development, minimum densities for selected residential zone districts, planned residential development, zero lot line development and density bonuses for up-zoning. Most of these mechanisms are available in the City’s development regulations and have been used in the SR 527 Corridor Subarea, as well as other areas in the City.</p>
<p><b>Suggested policy to consider to support action</b></p>	<p>Sufficient policy support for this action exists. However, the City could include a new or amended policy depending on how the legislation is implemented. Consider what housing goals inclusion of two housing units on a lot would connect with.</p>
<p><b>High level understanding of how much this proposed action might get utilized (Low, Moderate, or High)</b></p>	<p>Moderate. A land capacity analysis will better determine the number of new units this bill could result in. This work could be paired with reviewed how ADUs will impact housing capacity.</p>
<p><b>Target Group and Possible area(s) of applicability</b></p>	<p>Moderate to High income households in all single family residential zones.</p>

<p><b>Could this action provide an option to assist with meeting the new Housing Element requirements associated with the 2024 Comprehensive Plan update?</b></p>	<p>While this will increase housing capacity, it may not result in housing types that the City is not already planning for.</p>
<p><b>Could this action provide an option to assist with meeting any new housing targets associated with the 2024 Comprehensive Plan?</b></p>	<p>Yes. The City could allocate some housing capacity to the allowance of additional housing units on lots. It would be important to develop a methodology to help support the number of units the City expects during the planning period. A methodology for ADUs, in the above action could be utilized for this as well.</p>
<p><b>Cities that have taken the same or similar actions and additional resources to consider</b></p>	<p>Given this is a new set of requirements, all jurisdictions will be working to implement it over the next several years.</p>
<p><b>Advantages</b></p>	<p>Not applicable as the City has not yet developed an approach for implementing this bill. Once an approach is taken, advantages and disadvantages could be developed.</p>
<p><b>Disadvantages</b></p>	<p>✓ See above</p>
<p><b>Strategies implemented</b></p>	<p>New state laws focused on middle housing</p> 

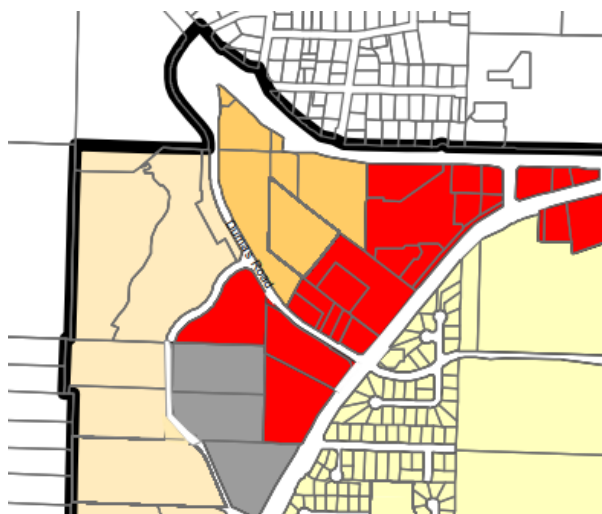
## Adjust densities in existing residential zones

The City has established the following residential zones and allowable densities for each zone.

- ✓ PRD 7200 - PRD: Approximately six (6) dwelling units per acre maximum
- ✓ LDR: Low density multifamily residential, four (4) dwelling units per acre maximum
- ✓ MDR: Medium density multifamily residential, twelve (12) dwelling units per acre maximum
- ✓ HDR: High density multifamily residential, twenty-four (24) dwelling units per acre maximum
- ✓ CB: Community Business, sixteen (16) dwelling units per acre maximum
- ✓ MU-HDR – Mixed Use/High Density Residential, twenty-four (24) dwelling units per acre maximum
- ✓ PCB – Planning Community Business, twenty-four (24) dwelling units per acre maximum

It might be advantageous to reevaluate and reestablish allowable dwelling units per acre. By doing so, it could increase opportunities for housing within the City. Consider:

- ✓ Increasing the maximum density in the Single-family residential zones to 10 dwelling units per acre. Typically, the maximum density that can be achieved for standard detached homes on 4,000 sq. ft. lots is about 10 per acre.
- ✓ The City may want to consider combining the PRD 7200 and LDR zones into one zone. While there is a small density difference, the zones are very similar. The basic difference is that the PRD 7200 properties were part of the original Mill Creek Master plan area and the LDR areas were annexed into the City. The zoning reflects what the county zoning was at the time of annexation. There does seem to be more opportunities for development and redevelopment within those LDR zoned areas. The approach to this may depend on how the City implements HB 1110 and 1337.
- ✓ Providing a density range of 10 or 12-18 units per acre in the MDR zone. Currently, the range is 5-12 du per acre. Requiring a higher minimum density (except when site conditions permit the minimum) will ensure that attached housing types, including townhomes, are built within the zone. The goal would be to ensure that lots are not underdeveloped. Five dwelling units per acres is very low density for a medium density zone.
- ✓ Consider changing the zoning or density allowances for certain properties zoned CB. Currently the CB zone only allows 16 du per acre. This is too low for multi-family development. Given the areas along 527 are along a Bus Rapid Transit (BRT) route and will be close to light



*Areas in red zoned CB along HWY 527 could provide opportunities for redevelopment if residential densities were increased.*


rail in the future, this is an option to consider. The current density is often associated with middle housing.

- ✓ Increasing the density range for the HDR, MU-HDR, and PCB zones. 24 units per acre is very low for multi-family. The City could consider a range of 24-36 units per acre or higher to encourage multi-family development. A market study could provide helpful information about the specific densities and opportunities for areas like this to accommodate growth in the future. Higher densities could also be utilized to provide affordable housing incentives.

There are numerous other adjustments to zoning or densities that could unlock potential opportunities to accommodate growth out to 2044. These are just a few of the options available.

<b>Existing policy or policies that support action</b>	There are numerous policies which support providing a variety of housing types and options.
<b>Suggested policy to consider to support action</b>	No new polices would be required for these actions unless necessary to help support programs to incentivize housing or promote certain housing types.
<b>High level understanding of how much this proposed action might get utilized (Low, Moderate, or High)</b>	Moderate to high. Given the amount of land available for development and redevelopment, this could provide a significant amount of new housing vs. what would be produced under the current zoning density allowances.
<b>Target Group and Possible area(s) of applicability</b>	Very low, Low, moderate, and high income households in most residential zones.
<b>Could this action provide an option to assist with meeting the new Housing Element requirements associated with the 2024 Comprehensive Plan update?</b>	Yes, this action would align with GMA Housing Element requirements in RCW 36.70A.070(2). This action is simply working to adjust densities to encourage housing development within existing zones.
<b>Could this action provide an option to assist with meeting any new housing targets associated with the 2024 Comprehensive Plan?</b>	Yes, this option would increase available housing capacity.



<p><b>Cities that have taken the same or similar actions and additional resources to consider</b></p>	<ul style="list-style-type: none"> <li>✓ Almost every jurisdiction has or will be looking at options to accommodate a variety of housing types. Right sizing zone densities is one way to accomplish this.</li> </ul>
<p><b>Advantages</b></p>	<ul style="list-style-type: none"> <li>✓ Could result in more housing in the city within the same zoning framework.</li> <li>✓ Could result in more housing choices for those looking for a home to rent or purchase.</li> <li>✓ Would assist in providing housing capacity needed to accommodate the city growth and housing targets as part of the comprehensive plan update.</li> </ul>
<p><b>Disadvantages</b></p>	<ul style="list-style-type: none"> <li>✓ Some may not agree that the proposed changes would align with the development they would like to see in the future.</li> </ul>
<p><b>Strategies implemented</b></p>	<p>Encourage a wide variety of middle housing options</p> 



Copper Tree – Mill Creek

## Middle housing definitions and uses

The City of Mill Creek allows townhouses or single-family attached dwellings in the PRD 7200, LDR, and MDR zones. MCC 14.01 defines a townhouse as "...a multiple dwelling unit meeting the following criteria: (1) no dwelling unit overlapping another vertically; (2) common side walls joining units; and (3) not more than six dwelling units in one structure." Single-family attached dwellings are defined as "...a one-family dwelling attached to only one other one-family dwelling."

It could be helpful to clarify housing definitions.

- ✓ Suggest modifying the term "Single-family attached dwellings" to the more commonly used term "duplex."
- ✓ Suggest modifying the existing for Accessory Dwelling Unit which currently reads:


*"Accessory dwelling unit" means a second dwelling unit that is subordinate to and located on the same lot as a principal residence and includes provisions for independent cooking, living, sanitation, and sleeping. Accessory dwelling units may be either attached to a principal single-family residence or an accessory building and may not be subdivided or segregated in ownership from the principal residence.*

Consider removing the language "*means a second dwelling unit that*" given HB 1337 will require the allowance of two ADUs on each residential lot. In addition, HB 1337 would allow the City to permit ADUs as attached or detached. Review definition to make sure it aligns with the future approach to permitting these units.

- ✓ Consider differentiating a triplex and fourplex (duplex is already defined) from being a townhouse. Given the densities in the PRD 7200 and LDR zones, it is highly unlikely the City would permit a housing unit with more than three or four units. Consider creating more definitions for these housing types. This will allow the City to better outline the types of housing permitted in various zones. Adding these additional definitions really depends on the City approach to permitting Middle Housing in various zones.
- ✓ It is common in codes to have definitions which overlap. As an example, the definition of townhouse could arguably include duplexes even though single-family attached dwellings are separately defined. Depending on the approach, it is suggested the term townhouse have a minimum and maximum number of units in a building.
- ✓ HB 1337 will require the City of Mill Creek to allow six of the nine Middle Housing types. Additional definitions may be needed to define the housing types the City elects to allow.

<b>Existing policy or policies that support action</b>	There are numerous policies which support providing a variety of housing types and options.
<b>Suggested policy to consider to support action</b>	No new polices would be required for this action.

<p><b>High level understanding of how much this proposed action might get utilized (Low, Moderate, or High)</b></p>	<p>This action would not result in additional housign units being built.It would, however provide more vcarity on the types of middle housing the City would like to see in various snlge family zones.</p>
<p><b>Target Group and Possible area(s) of applicability</b></p>	<p>Low, moderate, and high income households in most residential zones</p>
<p><b>Could this action provide an option to assist with meeting the new Housing Element requirements associated with the 2024 Comprehensive Plan update?</b></p>	<p>To some extent. It would highlight to a greater degree where the City of Mill Creek is planning for Middle Housing.</p>
<p><b>Could this action provide an option to assist with meeting any new housing targets associated with the 2024 Comprehensive Plan?</b></p>	<p>No</p>
<p><b>Cities that have taken the same or similar actions and additional resources to consider</b></p>	<p>The following are links to cities who define Middle Housing at a more granular level.</p> <ul style="list-style-type: none"> <li>✓ <a href="#">Snohomish</a></li> <li>✓ <a href="#">Snohomish County</a></li> <li>✓ <a href="#">Marysville</a></li> <li>✓ <a href="#">Lynnwood</a></li> </ul>
<p><b>Advantages</b></p>	<ul style="list-style-type: none"> <li>✓ Could provide consistency with terms.</li> <li>✓ Could assist in making it clear the types of housing the City is promoting in various zones.</li> </ul>

<b>Disadvantages</b>	✓ Would require additional code changes.
<b>Strategies implemented</b>	Encourage a wide variety of middle housing options 



Belvedere Place – Mill Creek

## Inclusionary zoning requirements or voluntary incentives for new development

Inclusionary zoning refers to development regulations that require or provide an incentive for new residential development to have a given share of the residential development to be affordable for people with low to moderate incomes. Inclusionary housing typically offers density bonuses or other incentives to encourage developers to engage in providing affordable units. This approach enlists private sector help in contributing to the affordable housing supply and reducing segregation of affordable and market-rate housing. There are options to incentivize or require this within a code. Under the Growth Management Act ([RCW 36.70A.540](#)) there are a variety of affordable housing incentive programs listed that jurisdictions may enact through development regulations, or conditions on rezoning or permit decisions. Affordable housing incentive programs enacted under this statute have certain requirements for affordability and length of time units must be held as affordable, but the statute also provides flexibility for local jurisdictions to craft these programs to fit local conditions.

As outlined by the [Alliance for Housing Affordability](#) (AHA), “Inclusionary zoning is most appropriate for areas with very strong housing markets, or where a future development surge is predicted. (In the areas adjacent to future transit stations, for example.) This tool can help mitigate displacement in these areas, where rents can rapidly rise out of reach for local lower income workers. At the same time, jurisdictions must take great care when developing inclusionary zoning policies to make sure they do not crush the local housing market, further exacerbating supply pressure. In addition, these policies should not be so conservative as to offer benefits in exchange for providing what could otherwise be produced at market rate.”

Inclusionary zoning could provide an option to implement new Housing Element requirements stemming from [House Bill 1220](#), which will be addressed as part of the 2024 Comprehensive Plan update. New requirements will have the City plan for housing by income band or by Area Median Income (AMI). [Housing Element guidance](#) and housing targets by income band are developed by Commerce and implemented by [Snohomish County Tomorrow \(SCT\)](#). Housing allocation “Method C,” under consideration by SCT, would require Mill Creek to plan for 2,591 housing units between 0-80% AMI. Inclusionary zoning is one method to increase housing supply for lower income households.

**City of Mill Creek**



**Snohomish County Tomorrow – Housing allocation by income**

**Existing policy or policies that support action**

HOUSING POLICY 1.01 Work with the development community to encourage affordable housing within the City.

HOUSING POLICY 1.04 Pursue strategies that encourage a variety of housing choices to be developed. Examples of the types of housing that will be considered are accessory dwelling units, congregate care facilities, retirement homes, mixed-use development, multifamily complexes, inclusionary zoning, manufactured housing and homesharing.

HOUSING POLICY 1.05 Strive to accommodate the special needs of various segments of the community including the elderly, developmentally disabled, physically handicapped and others with housing needs. Support the principle that fair and equal access to housing is available to all persons regardless of race, color, religion, gender, sexual orientation, age, national origin, familial status, source of income, or disability.

	<p>HOUSING STRATEGY 3: Continue to include provisions in the zoning code to implement strategies that encourage affordable housing and provide housing for special needs populations such as mixed-use development, congregate care facilities, retirement homes, accessory dwelling units and inclusionary zoning.</p>
<p><b>Suggested policy to consider to support action</b></p>	<p>While existing policies include the use of inclusionary zoning, new or revised policies may be warranted depending on how the code is implemented.</p>
<p><b>High level understanding of how much this proposed action might get utilized (Low, Moderate, or High)</b></p>	<p>Moderate. Providing an option for affordable housing could be advantageous for the city given the large number of housing units below 80% AMI the City will be planning for. This is one tool which could be utilized to provide capacity for more affordable housing units in the future.</p>
<p><b>Target Group and Possible area(s) of applicability</b></p>	<p>Very low, low, and moderate income households in higher density residential zones higher.</p>
<p><b>Could this action provide an option to assist with meeting the new Housing Element requirements associated with the 2024 Comprehensive Plan update?</b></p>	<p>Yes. Inclusionary zoning could provide an option to provide housing below 80% AMI. However, as indicated above, a program that works in one community may not work in another, given the economics of housing construction. It is suggested that any program be further studied to ensure it works and does not stymie market rate housing development.</p>

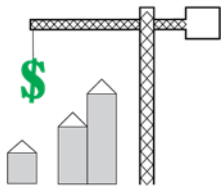


<p><b>Could this action provide an option to assist with meeting any new housing targets associated with the 2024 Comprehensive Plan?</b></p>	<p>Yes. There are very few ways for cities to provide housing capacity for lower income earners. Inclusionary zoning could demonstrate that housing capacity is being provided for low, very low, and extremely low-income households as required by new language in RCW <a href="#">36.70A.070</a> (Growth Management Act - Housing Element).</p>
<p><b>Cities that have taken the same or similar actions and additional resources to consider</b></p>	<p>Cities that have adopted inclusionary zoning measures:</p> <ul style="list-style-type: none"> <li>✓ <a href="#">Redmond</a></li> <li>✓ <a href="#">Kirkland</a></li> <li>✓ <a href="#">Issaquah</a></li> <li>✓ <a href="#">Shoreline</a></li> <li>✓ <a href="#">Seattle</a></li> <li>✓ <a href="#">Marysville</a></li> </ul> <p>Additional Resources:</p> <ul style="list-style-type: none"> <li>✓ <a href="#">Puget Sound Regional Council – Inclusionary Zoning overview and resources</a></li> <li>✓ <a href="#">MRSC – Inclusionary zoning overview</a></li> </ul>
<p><b>Advantages</b></p>	<ul style="list-style-type: none"> <li>✓ Can assist in providing more affordable housing.</li> <li>✓ Create neighborhoods with a mix of income levels without having to utilize taxpayer funded methods to employ.</li> <li>✓ Could provide a tool to assist in meeting new housing requirements under the GMA.</li> </ul>
<p><b>Disadvantages</b></p>	<ul style="list-style-type: none"> <li>✓ Can be a challenge to administer to ensure units stay affordable.</li> <li>✓ Could hinder development if utilized where the housing market is not strong enough to pencil for developers.</li> <li>✓ Typically requires development bonuses that may require the City to allow densities in zones it may not have otherwise considered.</li> </ul>
<p><b>Strategies implemented</b></p>	<p>The diagram illustrates three housing strategies:</p> <ul style="list-style-type: none"> <li><b>Incentivize New Housing:</b> Shows a crane lifting a house, with a dollar sign indicating financial incentives.</li> <li><b>Encourage a wide variety of middle housing options:</b> Shows a diverse mix of housing types, including small houses, townhomes, and mid-rise buildings.</li> <li><b>Prevent and Mitigate Displacement:</b> Shows a large apartment building and a small house, with a dollar sign indicating financial incentives to prevent displacement.</li> </ul>



## Adopt Multi Family Tax Exemption (MFTE) Program

RCW 84.14 establishes the Multifamily Tax Exemption (MFTE) program. While there are several goals of this legislation, the focus is on incentivizing the development of multiple-unit housing, including creating affordable housing. When a project is approved under the MFTE program, the value of the eligible housing improvements is exempt from property taxes, typically for 8 or 12 years. To receive a 12-year exemption, the property owner must commit to renting or selling at least 20% of the units to low- and moderate-income households. Land, existing improvements, and non-residential improvements are not exempt and are subject to normal property taxes.

<b>Existing policy or policies that support action</b>	Currently, there are no policies focused on MFTE as an option to provide affordable housing.
<b>Suggested policy to consider to support action</b>	If the City develops a program, it is suggested that specific MFTE policies be prepared and connected to affordable housing goals. There are plenty of policy options provided for in existing comprehensive plans for jurisdictions would have enacted the MFTE program.
<b>High level understanding of how much this proposed action might get utilized (Low, Moderate, or High)</b>	Moderate. Providing an option for affordable housing could be advantageous for the city given the large number of housing units below 80% AMI the City will be planning for. This is one tool which could be utilized to provide capacity for more affordable housing units in the future.
<b>Target Group and Possible area(s) of applicability</b>	Low to Moderate Income households in high density residential zones.
<b>Could this action provide an option to assist with meeting the new Housing Element requirements associated with the 2024 Comprehensive Plan update?</b>	Yes. Having an MFTE program could assist the City in meeting housing affordability goals.
<b>Could this action provide an option to assist with meeting any new housing targets associated with the 2024 Comprehensive Plan?</b>	Yes. Housing allocation “Method C,” being considered by SCT, would require Mill Creek to plan for 2,591 housing units between 0-80% AMI. Inclusionary zoning could provide one way to demonstrate that capacity for lower income earners is being provided for.

<p><b>Cities that have taken the same or similar actions and additional resources to consider</b></p>	<p>Numerous jurisdictions have enacted MFTE programs. The following are a sample of cities:</p> <ul style="list-style-type: none"> <li>✓ <u>Bellingham</u></li> <li>✓ <u>Tacoma</u></li> <li>✓ <u>Spokane</u></li> <li>✓ <u>MRSC</u> also provides useful information regarding the MFTE</li> </ul>
<p><b>Advantages</b></p>	<ul style="list-style-type: none"> <li>✓ This is a well-accepted and utilized program around the state to provide affordable housing units.</li> <li>✓ Cities across the state have implemented the program in diverse ways. This provides an opportunity to see what is or is not working in other areas before enacting a program.</li> <li>✓ Would provide a mechanism to demonstrate how the City will meet its 50-80% AMI housing target.</li> </ul>
<p><b>Disadvantages</b></p>	<ul style="list-style-type: none"> <li>✓ Would be another code to write and program to administer.</li> <li>✓ If not implemented properly, it may not get utilized.</li> <li>✓ Some may believe that providing property tax exemptions in exchange for building affordable units may not be equitable.</li> </ul>
<p><b>Strategies implemented</b></p>	<div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;"> <p>Incentivize New Housing</p>  </div> <div style="text-align: center;"> <p>Encourage a wide variety of middle housing options</p>  </div> <div style="text-align: center;"> <p>Prevent and Mitigate Displacement</p>  </div> </div>

## Density incentives in the LDR Low Density Residential zone

The City could explore options to incentivize more affordable housing outside of programs such as MFTE or inclusionary zoning. Providing incentives can help promote development the City would like to see and assist in addressing issues such as housing affordability and displacement, which can occur as redevelopment occurs.

The following densities are currently permitted within zones that permit housing:

- ✓ PRD 7200 - PRD: Approximately six (6) dwelling units per acre maximum
- ✓ LDR: Low density multifamily residential, four (4) dwelling units per acre maximum
- ✓ MDR: Medium density multifamily residential, twelve (12) dwelling units per acre maximum
- ✓ HDR: High density multifamily residential, twenty-four (24) dwelling units per acre maximum
- ✓ CB: Community Business, sixteen (16) dwelling units per acre maximum
- ✓ MU-HDR – Mixed Use/High Density Residential, twenty-four (24) dwelling units per acre maximum
- ✓ PCB – Planning Community Business, twenty-four (24) dwelling units per acre maximum

One of the other actions developed for this report focuses on density adjustments that could be considered in the above zones. This action is more focused on ways the city could retain existing zoned densities but incentivize greater densities. For multi-family zones, providing incentives could be considered in lieu of or in concert with MFTE or inclusionary zoning options.

Options could include:

- ✓ Tying the suggested density increases to affordable housing in multi-family zones. This would be different than just permitting higher densities by right. As an example, the City could allow higher residential densities in the CB, MU-HDR, and PCB zones when some affordable housing units are provided. The City could also allow up to 18 du per acre in the MDR zone when some affordable units are provided. It is vitally important that any incentives tied to density include some type of economic analysis to ensure that they will get utilized when implemented.

Many jurisdictions have programs to encourage, rather than require affordable housing in all circumstances including [Bellingham](#), [Kirkland](#), [Marysville](#), [Redmond](#), and [Shoreline](#).

- ✓ Allow a duplex or triplex to count as one dwelling unit for the purposes of density calculations in the PRD 7200 and LDR zones. As an example, you could consider counting a duplex as one unit on corner lots where driveways are on opposite streets. Tying higher density for great design could be an option that would work for developers and meet city expectations for neighborhood design.
- ✓ Not counting the existing single-family home towards maximum density when retained as part of redeveloping a property. [Snohomish County](#) currently has this allowance in their PRD code. Retaining an existing home during redevelopment is also a solid displacement strategy.

- ✓ Incentives could also include ideas like reducing fees for certain projects, creating a fast-track permit process, limiting special conditions for housing types the city is promoting, or completing pro-formas, completing public improvements, and reducing processes, such as SEPA, where impacts can be mitigated by adopted codes and regulations.

<p><b>Existing policy or policies that support action</b></p>	<p>HOUSING GOAL 1: Plan for affordable housing opportunities for all economic segments of the community.</p> <p>HOUSING GOAL 2: Plan for a wide variety of housing choices to accommodate all of the needs of the Mill Creek community.</p> <p>RESIDENTIAL DEVELOPMENT GOAL 3: Ensure that residential development occurs within a range of densities that preserves the existing housing stock, is compatible with surrounding land uses, and provides for a variety of housing types.</p> <p>RESIDENTIAL POLICY 1.01: Maintain the residential character of the City by providing a range of residential densities while maintaining and enhancing the City as a predominantly single-family residential community.</p> <p>HOUSING POLICY 1.01 Work with the development community to encourage affordable housing within the City.</p> <p>HOUSING POLICY 1.04 Pursue strategies that encourage a variety of housing choices to be developed. Examples of the types of housing that will be considered are accessory dwelling units, congregate care facilities, retirement homes, mixed-use development, multifamily complexes, inclusionary zoning, manufactured housing and homesharing.</p> <p>HOUSING POLICY 1.05 Strive to accommodate the special needs of various segments of the community including the elderly, developmentally disabled, physically handicapped and others with housing needs. Support the principle that fair and equal access to housing is available to all persons regardless of race, color, religion, gender, sexual orientation, age, national origin, familial status, source of income, or disability.</p>
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	<p>HOUSING STRATEGY 2: As a part of the implementation of the Comprehensive Plan, continue to consider zoning mechanisms and development standards that can increase density in appropriate areas. These mechanisms include compact development, minimum densities for selected residential zone districts, planned residential development, zero lot line development and density bonuses for up-zoning. Most of these mechanisms are available in the City’s development regulations and have been used in the SR 527 Corridor Subarea, as well as other areas in the City.</p> <p>HOUSING STRATEGY 3: Continue to include provisions in the zoning code to implement strategies that encourage affordable housing and provide housing for special needs populations such as mixed-use development, congregate care facilities, retirement homes, accessory dwelling units and inclusionary zoning.</p>
<p><b>Suggested policy to consider to support action</b></p>	<p>The City could include density incentives and/or densities for affordable housing within Housing Policy 1.04.</p>
<p><b>High level understanding of how much this proposed action might get utilized (Low, Moderate, or High)</b></p>	<p>Moderate. The impact of the action would depend on the program and how it is developed and implemented. However, increasing densities in various zones could result in more housing development. If affordable triggers are used, this could assist in meeting housing targets below 80% AMI.</p>
<p><b>Target Group and Possible area(s) of applicability</b></p>	<p>Very Low to High Income households in high density residential zones.</p>
<p><b>Could this action provide an option to assist with meeting the new Housing Element requirements associated with the 2024 Comprehensive Plan update?</b></p>	<p>Yes. This could assist in providing more housing at different income levels.</p>



<p><b>Could this action provide an option to assist with meeting any new housing targets associated with the 2024 Comprehensive Plan?</b></p>	<p>Yes. This option could increase housing production and provide for affordable housing units.</p>
<p><b>Cities that have taken the same or similar actions and additional resources to consider</b></p>	<p>See links above.</p>
<p><b>Advantages</b></p>	<ul style="list-style-type: none"> <li>✓ Could provide options to encourage more affordable housing citywide.</li> <li>✓ Could provide optional vs. mandatory programs for middle housing.</li> <li>✓ Could promote retention of existing homes.</li> <li>✓ Could assist in meeting housing targets by increasing capacity in the city.</li> </ul>
<p><b>Disadvantages</b></p>	<ul style="list-style-type: none"> <li>✓ Some options could require the City to subsidize some costs, such as reducing permit fees.</li> <li>✓ Fast tracking permits could result in longer permit timelines for non-affordable housing projects.</li> <li>✓ Removing permit processes for some housing types might lessen opportunities for public involvement.</li> <li>✓ There could be resistance to increasing densities in some areas.</li> </ul>
<p><b>Strategies implemented</b></p>	<p>The diagram illustrates three housing strategies:</p> <ul style="list-style-type: none"> <li><b>Incentivize New Housing:</b> A crane is lifting a house, with a green dollar sign (\$) next to it, indicating financial incentives.</li> <li><b>Prevent and Mitigate Displacement:</b> A large grey building is being replaced by a smaller orange house, with a green dollar sign (\$) below the new house, indicating financial support for existing residents.</li> <li><b>Encourage a wide variety of middle housing options:</b> A cluster of diverse housing types including townhomes, small houses, and a larger multi-unit building.</li> </ul>

## Permit review process incentives for affordable housing

The City could explore options to fast-track certain types of affordable housing projects. This could include moving projects which meet certain criteria to the front of the review queue for all review departments. The City could also include options such as setting up additional opportunities for review of projects with city staff (and other reviewing agencies) to limit review comments and finding ways of resolving project comments through project conditions rather than providing additional review comments, where appropriate.

For more targeted implementation, this could be set up as a demonstration program and be implemented for projects the city is actively trying to promote. Given the growth expected in the City, this may not have a large impact. However, messaging alone could be a way to attract development to the City of Mill Creek.

<b>Existing policy or policies that support action</b>	No current policies identified
<b>Suggested policy to consider to support action</b>	If this program is pursued, a policy could be developed which focuses on this specific program OR a policy could be developed to more broadly address city support for incentives for housing which is affordable or more affordable.
<b>High level understanding of how much this proposed action might get utilized (Low, Moderate, or High)</b>	Small to moderate. This action could result in affordable housing projects getting to the market faster by moving through the permit process faster. It might also be a way of marketing to potential developers.
<b>Target Group and Possible area(s) of applicability</b>	Very low to medium income households in all residential, and mixed-use zones.
<b>Could this action provide an option to assist with meeting the new Housing Element requirements associated with the 2024 Comprehensive Plan update?</b>	Although this action may assist with getting housing to market faster, this action would not be related to Housing Element requirements.

<p><b>Could this action provide an option to assist with meeting any new housing targets associated with the 2024 Comprehensive Plan?</b></p>	<p>Although this action may assist with getting housing to market faster, this action would not be related to new housing target requirements associated with the 2024 Comprehensive Plan update.</p>
<p><b>Cities that have taken the same or similar actions and additional resources to consider</b></p>	<p>Many cities have enacted a “fast track” permit process where an applicant can pay higher fees for service.</p> <ul style="list-style-type: none"> <li>✓ <u>Covington</u></li> <li>✓ <u>Issaquah Green Building Incentives</u></li> <li>✓ <u>Kirkland</u></li> <li>✓ <u>Vancouver</u></li> </ul> <p>General “fast track” programs have often failed because most applicants are willing to pay higher fees for expedited reviews and it is difficult to expedite a large volume of permits. If this were targeted for certain types of applications, it could certainly be accomplished and promoted.</p>
<p><b>Advantages</b></p>	<ul style="list-style-type: none"> <li>✓ Reduce permit timelines/streamline process for certain types of affordable housing projects.</li> <li>✓ Opportunity to promote and provide a unique opportunity for affordable housing developers.</li> </ul>
<p><b>Disadvantages</b></p>	<ul style="list-style-type: none"> <li>✓ If the program is too broad, the City may not have the staffing to support it if numerous projects use the program.</li> </ul>
<p><b>Strategies implemented</b></p>	<div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;"> <p>Encourage a wide variety of middle housing options</p>  </div> <div style="text-align: center;"> <p>Improve the Regulatory Environment for Permits</p>  </div> </div>



## Fee waivers or reductions for affordable housing

Options could be explored to reduce the cost of developing certain housing types in a way that would help boost production. Fees can make it expensive to build more housing and create financial barriers to new home construction, which can result in fewer projects moving forward. Impact or permit fee reductions or waivers could be explored along with incentive zoning (i.e., density bonuses or current use assessments).

The City utilizes SEPA to apply impact fees. This means that the City does not apply impact fees to Accessory Dwelling Units (ADUs), which is a great incentive for building them. In many jurisdictions, those upfront costs for homeowners can be a barrier to building an ADU. Note that [HB 1337](#), the 2023 ADU bill, requires all impact fees to be no more than ½ of the residential fee for a home.

Impact fee exemptions, reductions, and deferrals should be considered to help reduce upfront fees and encourage certain housing types. As an example, the City could exempt projects from certain impact fees assessed through SEPA that provide affordable housing options or reduce fees or costs for certain types of housing. Reducing upfront costs, especially for housing types that a homeowner might build on an existing lot could have a significant impact.

The City could also consider a demonstration program or temporary permit fee relief for targeted promotion of certain types of housing.

<b>Existing policy or policies that support action</b>	There are many policies focused on affordable housing options, but none are geared towards this specific topic.
<b>Suggested policy to consider to support action</b>	The City may want to consider a new policy geared towards affordable housing incentives if this option is implemented.
<b>High level understanding of how much this proposed action might get utilized (Low, Moderate, or High)</b>	Small to moderate. Reducing fees could result in additional new affordable housing. The greatest impact is likely for small builders, such as those building an ADU, where removing fees, like impact fees, could significantly reduce the costs of development.
<b>Target Group and Possible area(s) of applicability</b>	Moderate to high income households in low and moderate density residential zones.

<p><b>Could this action provide an option to assist with meeting the new Housing Element requirements associated with the 2024 Comprehensive Plan update?</b></p>	<p>Yes. This action could assist in demonstrating how the City is actively encouraging a variety of housing types and could be focused on more affordable housing types.</p>
<p><b>Could this action provide an option to assist with meeting any new housing targets associated with the 2024 Comprehensive Plan?</b></p>	<p>Yes. This action, coupled with other code changes regarding the provision of ADUs and middle housing in lower density zones, could provide for the additional housing types the City will be planning for as part of the 2024 Comprehensive Plan update.</p>
<p><b>Cities that have taken the same or similar actions and additional resources to consider</b></p>	<ul style="list-style-type: none"> <li>✓ <u>Olympia</u> (ADU – no impact fees)</li> <li>✓ <u>Mercer Island</u> (ADU – no impact fees)</li> <li>✓ <u>Everett</u> (Fee waiver for affordable housing)</li> <li>✓ <u>Lakewood</u> (Fee reductions for affordable housing)</li> <li>✓ <u>Puyallup</u> (Fee reductions for affordable housing)</li> </ul>
<p><b>Advantages</b></p>	<ul style="list-style-type: none"> <li>✓ Has the potential to reduce development costs for middle housing.</li> <li>✓ Fees could be reduced on a gradient rather than simply eliminated to target forms of housing.</li> </ul>
<p><b>Disadvantages</b></p>	<ul style="list-style-type: none"> <li>✓ Could deprive city and other taxing authorities of potential revenue to offset infrastructure costs.</li> </ul>
<p><b>Strategies implemented</b></p>	<p>The diagram illustrates three strategies for housing development:</p> <ul style="list-style-type: none"> <li><b>Bring Down the Cost of Development:</b> Represented by a large green dollar sign and a house icon, indicating cost reduction.</li> <li><b>Encourage a wide variety of middle housing options:</b> Represented by several different house icons, indicating diversification of housing types.</li> <li><b>Incentivize New Housing:</b> Represented by a crane lifting a house icon, symbolizing incentives for new construction.</li> </ul>

## Tenant protections

According to MRSC, "... the University of Washington Center for Real Estate Research, in spring 2009, stated the average rent for an apartment in Washington State was \$939 and the vacancy rate was 6.3%. By fall 2021, average rent had risen to \$1,547 and the vacancy rate had dipped to 3.6%..."

While rent control is not currently allowed under Washington State Law, because of drastic rent increases, the legislature and some cities and counties have enacted various tenant protection measures.

Local recommendations from A Regional Coalition for Housing (ARCH) include options such as:

- ✓ Notice of Rent Increase: Require landlords to provide a minimum of 120 days' written notice of rent increases greater than 3%, and 180 days' notice of rent increases greater than 10%, except in subsidized housing where rent is set based on the income of the tenant.
- ✓ Limits on Late Fees. Establish a cap on fees for late payments of rent at 1.5% of a tenant's monthly rent.
- ✓ Limits on Move-In Fees. Establish a cap on move-in fees and security deposits of no more than one month's rent except in subsidized tenancies where rent is set based on the income of the tenant and allow tenants to pay in installments.


State measures (from MSRC):

- ✓ Just cause eviction: In 2021 the legislature adopted RCW 59.18.650, which requires landlords to specify a reason for refusing to continue a residential tenancy, subject to certain limited exceptions.
- ✓ Managing initial deposits and fees: In 2020 the legislature adopted RCW 59.18.610, which provides that a tenant may request deposits, nonrefundable fees, and last month's rent in installments.
- ✓ A 60-day notice of rent increase: In 2019 the legislature amended RCW 59.18.140 to provide 60-day notice of a rent increase, and increases may not take effect until the completion of the term of the current rental agreement.
- ✓ A 120-day notice of demolition: In 2019, the legislature amended RCW 59.18.200 to require 120-day notice to tenants of demolition or substantial rehabilitation of premises.
- ✓ Prohibition on source of income discrimination: In 2018, the legislature adopted RCW 59.18.255, which prohibits source of income discrimination against a tenant who uses a benefit or subsidy to pay rent.
- ✓ COVID-19 measures: In 2021, the legislature adopted RCW 59.18.620 through RCW 59.18.630, which prohibit assessment of late fees for nonpayment of rent due between March 1, 2020, and six months following the expiration of the COVID-19 eviction moratorium.

Pursuant to RCW 59.18.630, landlords are also required to offer repayment plans to tenants with unpaid rent.

Several cities have codified the above measures and created enforcement processes for ensuring they are met.

<b>Existing policy or policies that support action</b>	There are currently no adopted policies on tenant protections.
<b>Suggested policy to consider to support action</b>	The City may want to consider a new policy or policies geared towards tenant protections if this option is implemented. The types of policies would depend on the goals of the program.
<b>High level understanding of how much this proposed action might get utilized (Low, Moderate, or High)</b>	Moderate. Codifying changes in code could help ensure tenant protections, as required by state law, are met. This could also assist with residential displacement which could occur via redevelopment or increased rents for those may not be able to afford them.
<b>Target Group and Possible area(s) of applicability</b>	Very low to moderate income households in high density residential and mixed-use zones.
<b>Could this action provide an option to assist with meeting the new Housing Element requirements associated with the 2024 Comprehensive Plan update?</b>	Yes. Changes to the House Element ( <u>RCW 36.70A. 070(f-g)</u> ) requires the City to develop policies and regulations to address displacement. Developing tenant protection policies and codes would certainly highlight consistency with these new requirements.
<b>Could this action provide an option to assist with meeting any new housing targets associated with the 2024 Comprehensive Plan?</b>	No.
<b>Cities that have taken the same or similar actions and additional resources to consider</b>	<ul style="list-style-type: none"> <li>✓ <u>Kenmore</u></li> <li>✓ <u>Redmond</u></li> <li>✓ <u>Auburn</u></li> <li>✓ <u>Burien</u></li> <li>✓ <u>Tacoma</u></li> <li>✓ <u>RCW 59.18 – Residential Landlord – Tenant Act</u></li> </ul>

<p><b>Advantages</b></p>	<ul style="list-style-type: none"> <li>✓ Increase tenant protection within the city.</li> <li>✓ Codify recent state law changes.</li> <li>✓ Directly address new Growth Management Act – Housing Element requirements.</li> </ul>
<p><b>Disadvantages</b></p>	<ul style="list-style-type: none"> <li>✓ Developing new codes and implementing new programs will take resources, including enforcement.</li> <li>✓ Implementing new programs beyond what the statute requires could be met with resistance from those who rent single family and multi-family residences.</li> </ul>
<p><b>Strategies implemented</b></p>	<p>Prevent and Mitigate Displacement</p> 



Lakewood – Mill Creek


## Business displacement strategies

Commercial redevelopment is occurring in Mill Creek. When this happens, displacement of residents or businesses can occur on a temporary or permanent basis. While this issue may not be a large issue for the City now, it could be as redevelopment occurs in the future. The key is to have a proactive program in place in advance of displacement occurring and finding ways to assist businesses through this process. The City of Redmond has developed a program that has been successful in proactively tackling these issues. Measures they have taken or are considering include:

- ✓ Use development agreements to negotiate commercial space set-asides for local businesses in perpetuity, and for the relocation of businesses in structures being redeveloped.
- ✓ Review redevelopment projects and work directly with applicants to identify opportunities for future projects to mitigate displacement impacts to businesses located within a project site.
- ✓ Incentivizing local business preservation by allowing increased height or density in return for the provision of restricted commercial space for use by local businesses.
- ✓ Contracting with external experts to meet 1:1 with local businesses to identify the operational and monetary impacts resulting from redevelopment.
- ✓ Work directly with business operators and property-owners throughout the community to set up meetings on potential relocation options with the goal of retaining as many legacy businesses as possible and helping to build connections within the community.
- ✓ Directly working with entities to support businesses with information to assist with business relocation.

It is important to note that redevelopment in Redmond is much different than Mill Creek. However, planning is proactive. Consider the communities around Mill Creek over the past decade and what this could mean for the City in the future. Understanding the range of circumstances to prepare for in the future is important so the city can be prepared when change occurs, rather than just reacting to it. At the very least, this option can be a reference point for future conversations.

<b>Existing policy or policies that support action</b>	There are currently no adopted policies on business displacement.
<b>Suggested policy to consider to support action</b>	The City may want to consider a new policy or policies geared towards business displacement if this option is implemented. The types of policies would depend on the goals of the program.

<p><b>High level understanding of how much this proposed action might get utilized (Low, Moderate, or High)</b></p>	<p>Low to moderate. Implementing anti-displacement measures for businesses in advance of redevelopment occurring, could provide a proactive mechanism to retain and assist business as redevelopment occurs.</p>
<p><b>Target Group and Possible area(s) of applicability</b></p>	<p>Businesses operating in the city near zones with a higher potential for an increase in density or land use.</p>
<p><b>Could this action provide an option to assist with meeting the new Housing Element requirements associated with the 2024 Comprehensive Plan update?</b></p>	<p>Although this action may assist with getting housing to market faster, this action would not be related to new housing target requirements associated with the 2024 Comprehensive Plan update.</p>
<p><b>Could this action provide an option to assist with meeting any new housing targets associated with the 2024 Comprehensive Plan?</b></p>	<p>Although this action may assist with getting housing to market faster, this action would not be related to Housing Element requirements.</p>
<p><b>Cities that have taken the same or similar actions and additional resources to consider</b></p>	<ul style="list-style-type: none"> <li>✓ <u>Seattle</u></li> <li>✓ <u>Small business assistance and tools</u></li> </ul>
<p><b>Advantages</b></p>	<ul style="list-style-type: none"> <li>✓ Proactive approach to working with the business community in advance of and during redevelopment to mitigate displacement risk.</li> </ul>
<p><b>Disadvantages</b></p>	<ul style="list-style-type: none"> <li>✓ A new program would take city resources and time to develop and implement. It may not be needed given the level of current redevelopment in the city.</li> </ul>
<p><b>Strategies implemented</b></p>	<p>Prevent and Mitigate Displacement</p> 

# Racial Equity and Displacement Analysis

## CITY OF MILL CREEK

June 2023



**Prepared by:**

LDC, Inc



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## I. Introduction

In 2022, the City of Mill Creek received a Middle Housing grant from the Washington State Department of Commerce. The grant program was authorized by the 2022 supplemental state operating budget and was developed to support the adoption of ordinances authorizing middle housing types, along with conducting a racial equity and anti-displacement study. The intent is for cities to study their existing housing conditions, develop options to provide a greater variety of housing types, and to identify any communities that may be at risk of racial discrimination or displacement.

The timing for this project is ideal, as the City is beginning the required 2024 periodic update to the comprehensive plan and development regulations. The Middle Housing study plays an even more important role in the update given recent legislative changes. In 2021, the Washington State Legislature amended the Housing Element requirements of the Growth Management Act (GMA) through [House Bill 1220](#).

The amendment strengthened the GMA Housing Element in a variety of ways. This includes modifying language from encouraging the availability of affordable housing to a requirement to plan and accommodate affordable housing to all economic segments of the population. This puts a greater responsibility on local government to plan for housing for low- and moderate-income households. Middle Housing types can help meet this need.

Housing Element amendments also include new requirements to analyze racially disparate impacts, displacement, and exclusion in housing. This report is focused on providing the City with initial information on each of these issues. The report's findings can then be utilized as part of the comprehensive plan update, to assist in meeting new Housing Element requirements.

### Excerpt from GMA Housing - Element RCW 36.70A.070(2)

(e) Identifies local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:

(i) Zoning that may have a discriminatory effect;

(ii) Disinvestment; and

(iii) Infrastructure availability;

(f) Identifies and implements policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions;

(g) Identifies areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments; and

(h) Establishes anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.

Figure 1. Excerpt from GMA Housing Element

## II. Report Purpose

The Racial Equity and Displacement Analysis Report is focused on addressing each of the Department of Commerce Middle Housing grant program requirements. These sync with new Housing Element requirements listed in [RCW 36.70A.070](#)(e-h):

**Objective 1.** Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including: zoning that may have a discriminatory effect; disinvestment; and infrastructure availability. ([Link to analysis](#))

**Objective 2.** Identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations. ([Link to analysis](#))

**Objective 3.** Evaluate displacement risk of very low, low, and moderate-income households. ([Link to analysis](#))

**Objective 4.** Evaluate displacement risk of individuals from racial and ethnic communities which have been subject to discriminatory housing policies in the past. ([Link to analysis](#))

Based upon the findings from this analysis a range of policy options has been developed, which the City of Mill Creek can consider during the comprehensive plan update. This includes:

- Options and recommendations the City could consider (both policy and regulations) to address any identified impacts from current policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing.
- Identification of anti-displacement strategies and programs which could minimize displacement of low-income residents resulting from redevelopment.

## III. Connection to the Comprehensive Plan

The City of Mill Creek will conduct a periodic update of its Comprehensive Plan to be completed no later than December of 2024. As part of that process, the city will be planning for growth (population, housing, and employment) out to 2044. The amount of growth the city plans for is linked to the types of actions necessary to meet housing goals. The more growth expected, the more creative the city must be to accommodate that growth. This report will help support options the city can consider to meet the Housing Element requirements.

Planning is a balance between implementing state and regional requirements with substantial local deference, which is afforded to the city so it can plan in a way that is best for its community.

While broad housing requirements are outlined within the Growth Management Act ([RCW 36.70A.070\(2\)](#)), policies are also developed at the regional and countywide levels.

The Puget Sound Regional Council (PSRC) is a regional body that develops policies around transportation, economic development, and growth (including housing). [Vision 2050's](#) multicounty planning policies and

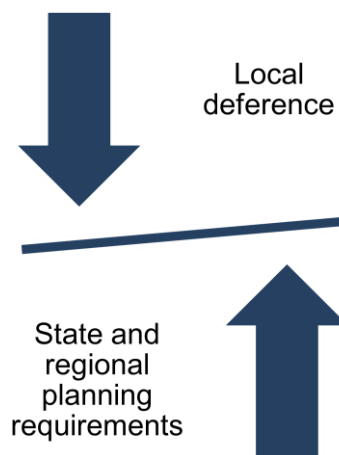


Figure 2. Balancing planning requirements

regional growth strategy guide planning at the countywide level and comprehensive plans done by cities and counties.

Snohomish County Tomorrow (SCT) facilitates the development of the [Snohomish County Countywide Planning Policies](#) (CPPs), which help ensure Snohomish County and the cities within the county coordinate on growth issues. The policies in the CPPs are further refined at the local level as the city completes its Comprehensive Plan update.

In addition to Housing Element changes, which have occurred since the City of Mill Creek last updated its comprehensive plan in 2015, regional and countywide planning policies have also been updated. To account for changes to state laws and regional and countywide policies, a separate analysis, prepared for the 2024 comprehensive plan update has been completed. It identifies where there are policy or code gaps that will need to be addressed as part of the update. This includes state law and regional and countywide policies changes focused on racially disparate impacts, displacement, and exclusion in housing. The findings from that analysis will be utilized in combination with this report as the comprehensive plan update process moves forward.

Weighing and balancing new planning requirements is an important part of the Comprehensive Plan update process. The goal is to adopt a comprehensive plan and implement regulations that are consistent with new and updated state laws and regional policies and that also reflect the vision for the City of Mill Creek as it plans out to 2044.

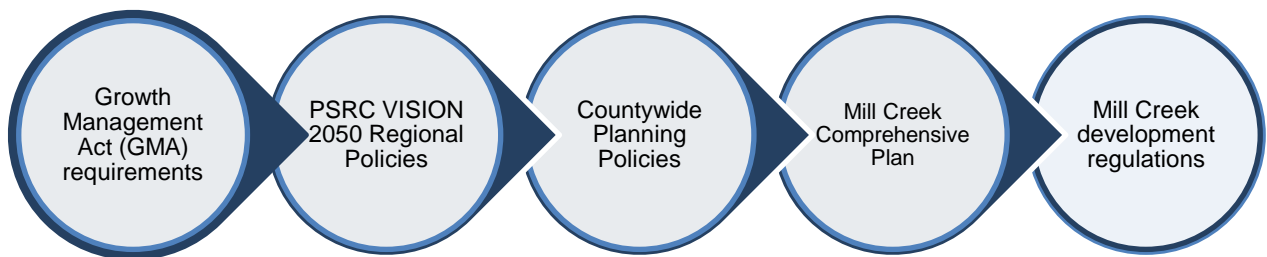


Figure 3. How state, regional, and city planning processes work together.

## IV. Background

### Land Use Regulation & Relationship to Racial Inequity

Institutional racism can be defined as, “The perpetuation of discrimination based on “race” by political, economic, or legal institutions and systems ... institutional racism reinforces inequalities between groups – e.g., in wealth and income, education, health care, and civil rights – on the basis of the groups’ perceived racial differences”<sup>1</sup>. Harmful beliefs, policies, and regulations of the 20th century political environment influenced the practice of urban planning in the United States. In other words, urban

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<sup>1</sup> Britannica, The Editors of Encyclopaedia. "institutional racism". Encyclopaedia Britannica, 20 Feb. 2023, <https://www.britannica.com/topic/institutional-racism>. Accessed 18 April 2023.

planning was another avenue in which discriminatory ideologies were materialized. Two of these practices are discussed below.

In the early 20<sup>th</sup> century, before the Supreme Court’s *Buchanan v. Warley* decision in 1917, local ordinances in many communities explicitly prohibited black people from buying homes or occupying blocks where most residents were white. Exclusionary zoning also promoted the segregation of income levels. Suburbs developed mainly in the post-World War II era were primarily occupied by wealthy white families, and due to racially restrictive covenants, redlining, and other institutional practices, it was very difficult if not impossible for other racial and ethnic groups to achieve homeownership and build household wealth in the same way. Requirements for large minimum lot and building footprint sizes, single residence per lot regulations, and the geographic separation and dependence on cars made the suburbs an expensive plan to live. Racial and economic discrimination often act as one in the same, as minority groups are more likely to be living in poverty when compared against white populations.

Redlining was a practice established by the Roosevelt administration in 1934 through the Federal Housing Administration (FHA) and Homeowner’s Loan Coalition (HOLC) and was ultimately institutionalized through the development of the FHA’s underwriting manual. This practice classified neighborhoods by risk factor to be used by the federal government when issuing mortgages. According to the Fair Housing Center of Greater Boston, “Redlining is the practice of denying or limiting financial services to certain neighborhoods based on racial or ethnic composition without regard to the residents’ qualifications or creditworthiness”<sup>2</sup>. The Fair Housing Act was passed in 1968, which prohibited discrimination based on race, color, national origin, sex, ability, and familial status. However, it did not make discrimination based on class illegal. As communities of color had been the target of harmful practices and policies up until this point, they often fell into lower economic classes – this made it difficult for the Fair Housing Act to protect them from further discrimination.

There were other significant ways racial discrimination shaped the field of urban planning and ultimately the political, economic, and environmental landscapes of U.S. cities that have had lasting, generational impacts. Cities across the U.S., including in Washington State, have since recognized these impacts and have begun working towards reconciliation.

Even today, there are subdivisions and properties that have restrictions based on race. According to the [University of Washington](#), there are 94 subdivisions and 3,800 restricted properties in Snohomish County.

While this research did not uncover any restrictive covenants or restricted parcels within Mill Creek city limits, there are seven subdivisions with restrictions within the city’s Urban Growth Area (UGA) around the Martha Lake area.

These covenants are certainly not legally enforceable today but are a reminder of past practices that excluded housing opportunities for non-white people. Today, housing exclusion can look like concentrating lower income housing types in areas where investments in schools, parks, and infrastructure may be less than in more affluent areas.

The Puget Sound Region has experienced population and employment growth that has created a challenging housing environment. It is important for the City of Mill Creek to address these issues and

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<sup>2</sup> “The Federal Housing Administration (FHA) Institutionalizes Racism.” *1934–1968: FHA Mortgage Insurance Requirements Utilize Redlining*, <https://www.bostonfairhousing.org/timeline/1934-1968-FHA-Redlining.html>.

plan proactively for the future. This study is meant to identify if racial discrimination and displacement risks exist and to suggest policies to address these issues as the City plans for future growth and change.

## Displacement

Washington State Department of Commerce defines Displacement as:

*“The process by which a household is forced to move from its community because of conditions beyond their control.”<sup>3</sup>*

This is a different phenomenon than when property owners voluntarily sell their interests out of personal choice. There are several types of displacement, including:

- Physical displacement - Households are directly forced to move for reasons such as eviction, foreclosure, natural disaster or deterioration in housing quality.
- Economic displacement - Households are compelled to move by rising rents or costs of home ownership like property taxes.
- Cultural displacement – Residents are compelled to move because the people and institutions that make up their cultural community have left the area.

Puget Sound Regional Council (PSRC) has prepared a Displacement Risk map which compiles a variety of displacement risk measures to rank locations and identify displacement risk. More information can be found on the PSRC [website](#).

The Displacement Risk map (Figure 4) indicates that the overall displacement risk in the Mill Creek region is moderate to low. The western portion of the City is under moderate (light blue) risk of displacement. However, most of that area contains critical area or is built out with a variety of housing types. This area also includes the Town Center where many services and amenities are located. The rest of Mill Creek is under lower risk (light green) of displacement.

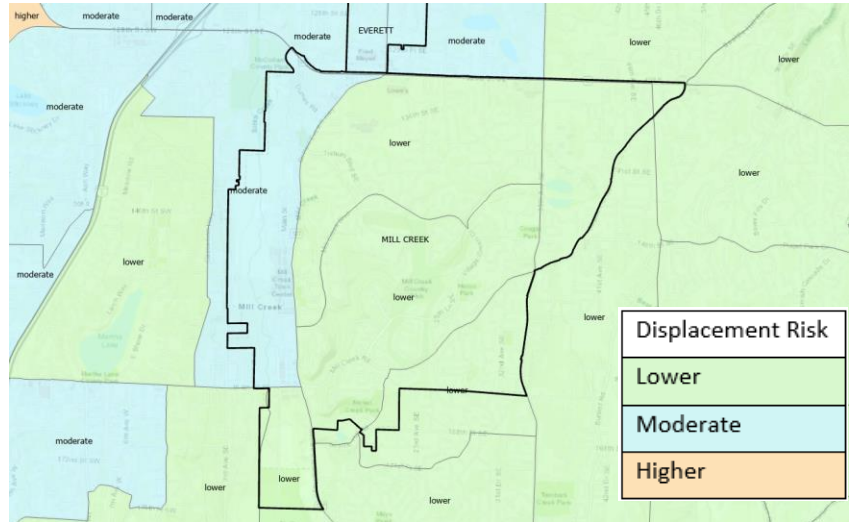


Figure 4. PSRC Displacement Risk Map  
Source: <https://www.psrc.org/our-work/displacement-risk-mapping>

<sup>3</sup> Washington State Department of Commerce, Growth Management Services. “Racially Disparate Impacts Guidance”. 28 November 2022. [https://www.ezview.wa.gov/site/alias\\_1976/37776/resources.aspx](https://www.ezview.wa.gov/site/alias_1976/37776/resources.aspx)

## Income Categories

The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including the Public Housing, Section 8 project-based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities programs. HUD defines limits for Low, Very Low, and Extremely Low incomes relative to the HUD Area Median Family Income (HAMFI). These income categories can be seen on the right in Figure 5. In this report, analysis will use the income brackets to the right to summarize data including household incomes greater than the HUD Low bracket. HUD uses HAMFI defined for the Seattle-Bellevue metro area to calculate income limits for the City of Mill Creek. Figure 6 below is a breakdown of the income limits based on family size.

Extremely Low Income (HUD definition)	<=30% HAMFI
Very Low Income (HUD definition)	>30% HAMFI and <=50%
Low Income (HUD definition)	>50% HAMFI and <=80%
Moderate Income	>80% HAMFI and <=100%
Greater than HAMFI Median	>100% HAMFI

Figure 5. HUD Income Categories

FY 2022 Income Limit Area	Median Family Income	FY 2022 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Seattle-Bellevue, WA HUD Metro FMR Area	\$134,600	Low (80%) Income Limits (\$)	66,750	76,250	85,800	95,300	102,950	110,550	118,200	125,800
		Very Low (50%) Income Limits (\$)	45,300	51,800	58,250	64,700	69,900	75,100	80,250	85,450
		Extremely Low Income Limits*	27,200	31,050	34,950	38,800	41,950	45,050	48,150	51,250

Figure 6. HUD Income Limits, Seattle-Bellevue Metro FMR Area

Source: HUD Annual Fiscal Year Income Limits Determination

## Cost Burden

HUD considers a household to be housing cost burdened if they spend more than 30 percent of their income on housing costs, which can include mortgage payments and property taxes (for owner households), rent (for renter households), and utilities (for all households). A household is severely housing cost burdened if they spend more than 50 percent of their income on housing costs. Cost-burdened households make tradeoffs in other areas of their spending, such as food, transportation, health care, or childcare. Excessive housing cost burden contributes to economic displacement pressures which households with lower incomes are especially vulnerable to.



## V. Mill Creek Community Profile

A community profile outlines existing conditions in the City to help analyze equity and displacement risk. This includes community demographics and current housing affordability information.

### Mill Creek is majority white, and the primary language spoken is English.

65.3 percent Mill Creek residents identify as white, 18.9 percent as Asian, 4.4 percent as Black or African American, 0.5 percent as Native Hawaiian or Other Pacific Islander, and 0.3 percent as American Indian and Alaska Native alone. See Figure 7 for population estimates.

When compared against Snohomish County, Mill Creek is somewhat more diverse.

According to the U.S. Census Bureau (Figure 8), the dominant language spoken at home by Mill Creek’s residents who are five years of age and above is English (74.6 percent). The second most spoken language group are Asian and Pacific Island languages (12.3 percent). Smaller percentages of households speak Spanish and other Indo-European languages.

Racial Identity	Population	Percent of Population
White	13,540	65.3%
Asian	3,923	18.9%
Black or African American	905	4.4%
Native Hawaiian and Other Pacific Islander	102	0.5%
American Indian and Alaska Native	66	0.3%
Some other race	709	3.4%
Two or more races	1,505	7.3%

Figure 7. Mill Creek population by racial group of one race  
Source: US Census Bureau, ACS 2020 5-Year Estimates, Table DP05

- English only
- Asian and Pacific Island languages
- Spanish
- Other Indo-European languages
- Other languages

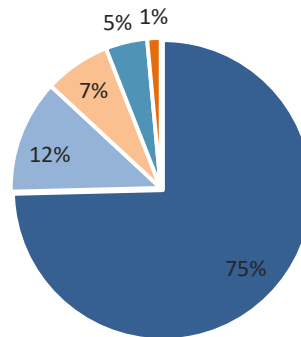


Figure 8. Languages spoken at home, population aged 5 and over  
Source: US Census Bureau, ACS 2020 5-Year Estimates, Table S1601

### Mill Creek has many middle-aged adults living in the city.

Since housing needs change over a person’s lifetime, it is important to track shifts among age cohorts to anticipate expected demand.

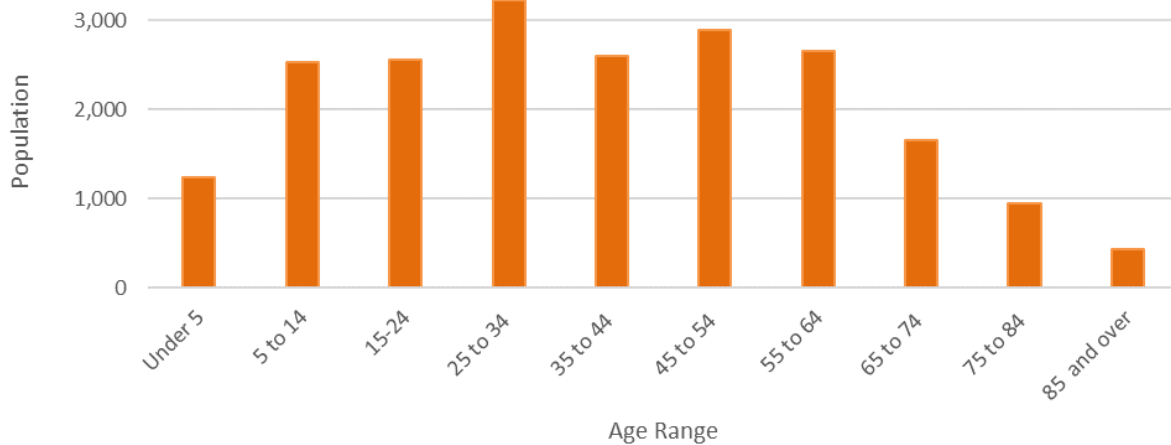


Figure 9. Mill Creek population by age range  
Source: US Census Bureau, ACS 2020 5-Year Estimates, Table DP05

Mill Creek’s age makeup, as shown in Figure 9, is concentrated around individuals between the ages of 25 to 54 and has a median age of 38. This indicates that the city is home to many middle-aged adults. This age group is likely at or entering the height of their professional careers and may be looking towards starting families, buying their first homes, and making other significant life decisions.

### Increased demand, housing scarcity, rising costs, and lagging household incomes particularly for households who rent their home.

When it comes to housing for Mill Creek residents, median rents and home values have increased disproportionately between 2010 and 2020. The median monthly rent in Mill Creek increased from

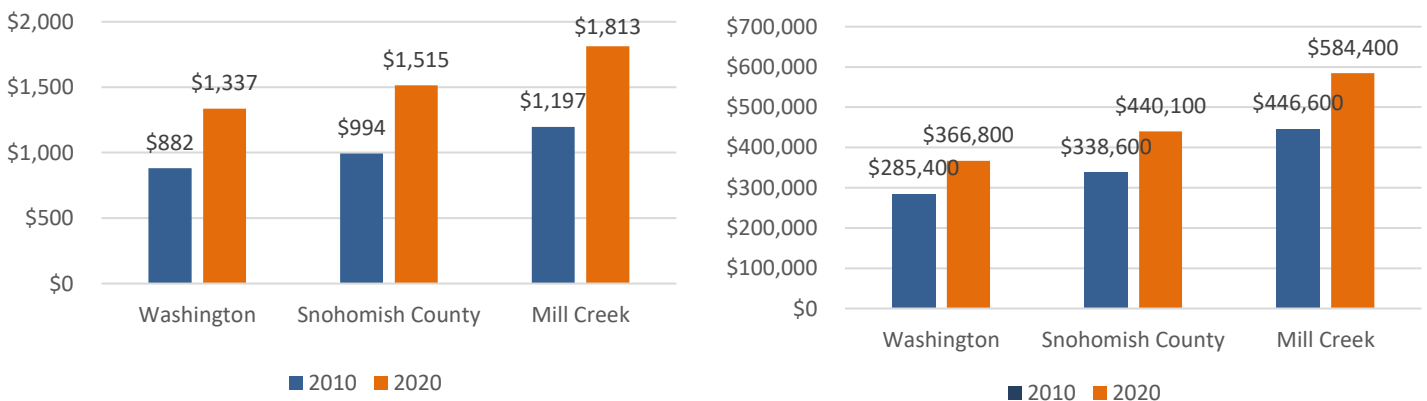


Figure 10. Median annual rent  
Source: US Census Bureau, ACS 2020 5-Year Estimates, Table DP04

Figure 11. Median home value  
Source: US Census Bureau, ACS 2020 5-Year Estimates, Table DP04

\$1,197 in 2010 to \$1,813 in 2020 (51.5 percent increase), while home values increased from \$446,600 in 2010 to \$584,400 in 2020 (30.1 percent increase). In comparison to the surrounding region, as seen in Figure 10 and Figure 11 below, Mill Creek has both higher rent and home values, but has grown at similar rates to Snohomish County and Washington state.

### Mill Creek Housing Compared to Snohomish County

The City of Mill Creek experiences many of the same market pressures and regional housing issues that affect neighboring jurisdictions; issues such as increasing renter and owner housing cost. As seen in Figure 12 and Figure 13, Mill Creek has 33 percent higher home values and 23 percent higher rents compared to Snohomish County on average between 2015 and 2021.

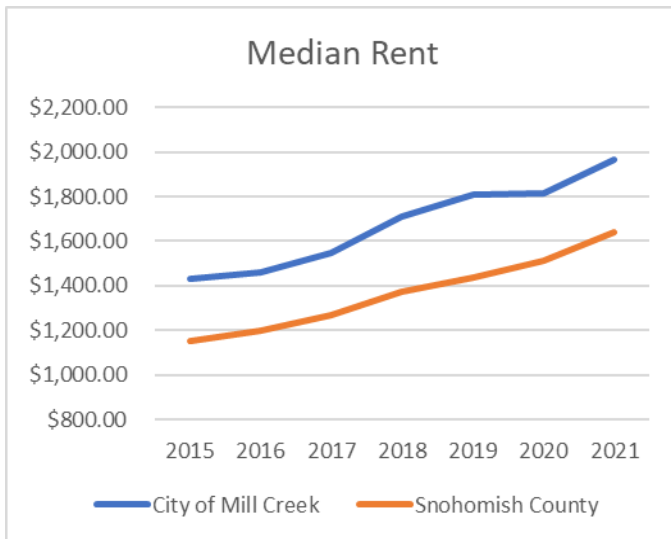


Figure 12. City and County Median Rents  
Source: U.S. Census Bureau; American Community Survey 5-Year Estimates, Table DP04

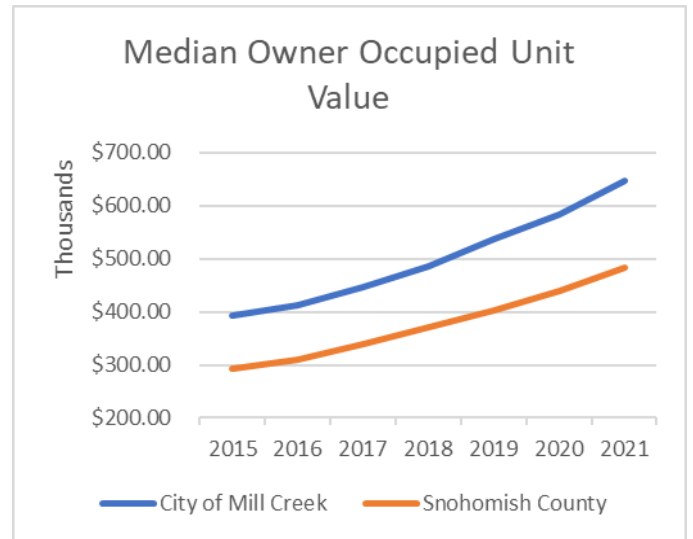


Figure 13. City and County Median Owner-Occupied Unit Value  
Source: U.S. Census Bureau; American Community Survey 5-Year Estimates, Table DP04

## Mill Creek Income

Alongside housing cost increases, the median household income in Mill Creek was \$86,461 in 2010 and \$104,951 in 2020, for a growth of 21 percent over that period and an average annual growth rate of 2 percent. In comparison to the rest of the region, Mill Creek residents tend to earn more than other residents of Snohomish County, as seen in Figure 14 to the right.

Median income for households who own their unit grew from \$110,047 in 2010 to \$142,917 in 2020, an increase of 30 percent. Median income for households who rent their housing unit rose from \$55,833 in 2010 to \$74,153 in 2020, an increase of 33 percent.

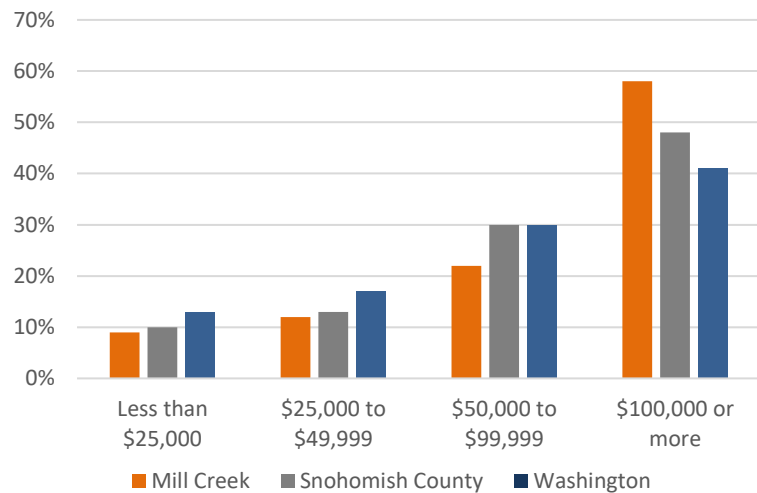


Figure 14. Household income ranges  
Source: US Census Bureau, ACS 2021 5-Year Estimates, Table S1901

This means that incomes for owners have largely kept up with the rise in costs to buy homes while incomes for renters aren't keeping up with their housing costs, despite their income increasing at a faster rate than homeowners. Home prices rose by 30 percent while incomes for homeowners have also risen by 30 percent. Meanwhile, rents have increased by 51.5 percent while incomes for renters have only increased by 33 percent.

## Racial and ethnic disparities merit a targeted approach to relieving cost burden.

According to U.S. Department of Housing and Urban Development (HUD), 42 percent of Mill Creek renter households and 17 percent of households that own are cost burdened. Cost-burdened households are those spending more than 30 percent of their annual income on housing-related costs. Severely cost-burdened households spend more than half their annual income on housing related costs. Cost-burdened households make tradeoffs in other areas of their spending, such as food, transportation, health care, or childcare. Figure 16 and Figure 17 below show the number of cost burdened households in Mill Creek. Table 16 specifically separates this data by renters and owners.

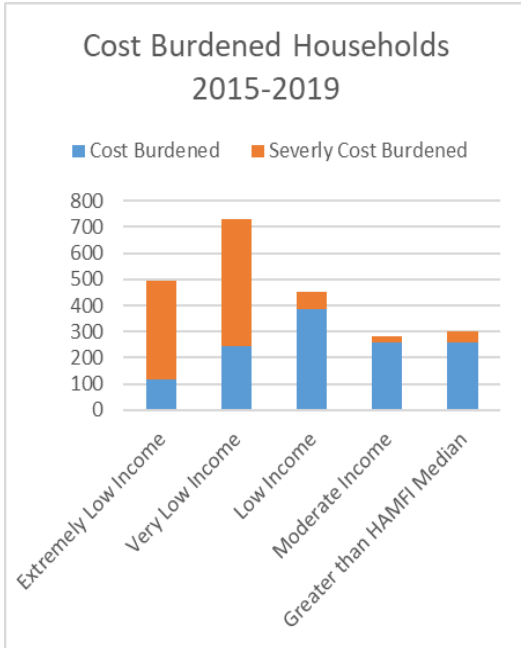


Figure 15. Cost Burdened Households  
Source: HUD-CHAS 2015-2019 Data (Table 8)

	Renter Households		Owner Households	
	> 30%	> 50%	> 30%	> 50%
<b>Cost Burden</b>				
Household Income <= 30% HAMFI	45	265	70	115
Household Income >30% to <=50% HAMFI	130	415	115	70
Household Income >50% to <=80% HAMFI	330	10	55	55
Household Income >80% to <=100% HAMFI	155	0	105	20
Household Income >100% HAMFI	20	30	240	10
<b>Total</b>	<b>680</b>	<b>720</b>	<b>585</b>	<b>270</b>

Figure 16. Cost burden by income, owners and renters  
Source: HUD-CHAS 2015-2019 Data (Table 8)

## VI. Middle Housing Policy Options and Recommendations

Our region has and will continue to face great challenges as we grow. This includes the ability to provide housing that is more affordable to people making different incomes. This includes Middle Housing, defined in Figure 17. [RCW 36.70A.070](#)(2) outlines the requirements for the Housing Element of the comprehensive plan, which provides capacity for Middle Housing and “Includes a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including [...] moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes”. Revised regional policies also provide a focused lens on providing more housing at all income levels.

### What is Middle Housing?

“Middle housing is a term for homes that are at a middle scale between detached single-family houses and large multifamily complexes. Examples include duplexes, triplexes, fourplexes, fiveplexes, sixplexes, courtyard apartments, cottage clusters, and townhomes. These types are typically ‘house-scale’; that is, the buildings are about the same size and height as detached houses.”

Figure 17. Definition of middle housing. WA Department of Commerce, [Planning for Middle Housing](#) webpage.

The current City of Mill Creek Comprehensive Plan contains a variety of policies focused on housing. The [analysis section](#) of this report provides a table that includes the current Housing Element goals and policies focused on Middle Housing. The following existing goals and policies support providing for Middle Housing types.

- **HOUSING GOAL 2:** Plan for a wide variety of housing choices to accommodate all of the needs of the Mill Creek community.
- **HOUSING POLICY 1.04:** Pursue strategies that encourage a variety of housing choices to be developed. Examples of the types of housing that will be considered are accessory dwelling units, congregate care facilities, retirement homes, mixed-use development, multifamily complexes, inclusionary zoning, manufactured housing and homesharing.
- **HOUSING STRATEGY 2:** As a part of the implementation of the Comprehensive Plan, continue to consider zoning mechanisms and development standards that can increase density in appropriate areas. These mechanisms include compact development, minimum densities for selected residential zone districts, planned residential development, zero lot line development and density bonuses for up-zoning. Most of these mechanisms are available in the City’s development regulations and have been used in the SR 527 Corridor Subarea, as well as other areas in the City.

Since the last major update to the Comprehensive Plan in 2015, GMA Housing Element requirements have changed, and regional and countywide planning policies have been updated. The city will be addressing each of these as it updates its comprehensive plan.

### State and regional policy changes – Middle Housing

The following table outlines some of the changes to the Housing Element (through HB 1220) and regional and countywide planning policies primarily focused on middle housing. Underlined language indicates that it is a new language that has been adopted since the last Comprehensive Plan update. Language that has been removed is shown with a ~~strikethrough~~.

Note that the regional policies in VISION 2050 were adopted in October 2020. Housing Bill 1220, which modified Housing Element requirements, was adopted in May 2021. While VISION 2050 is not required to fully address each change to state law requirements for planning, it is likely that additional policy considerations would have been made if Housing Element changes were adopted first. Therefore, there are some areas that are now addressed at the state level that may not be included in regional or countywide planning policies.

<p><b>Housing Element – RCW 36.70A.070(2)</b></p>	<ul style="list-style-type: none"> <li>• (a)(i-ii) Includes an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth including... <u>Units for moderate, low, very low, and extremely low-income households*</u></li> <li>• (b) Includes a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including single-family residences, <u>and within an urban growth area boundary, moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes</u></li> <li>• (c) <u>Identifies sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes</u></li> <li>• (d) <u>Makes</u> adequate provisions for existing and projected needs of all economic segments of the community, including:             <ul style="list-style-type: none"> <li>• (i) <u>Incorporating consideration for low, very low, extremely low, and moderate-income households;</u></li> <li>• (ii) <u>Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations;</u></li> <li>• (iii) <u>Consideration of housing locations in relation to employment location; and</u></li> <li>• (iv) <u>Consideration of the role of accessory dwelling units in meeting housing needs;</u></li> </ul> </li> </ul>
<p><b>VISION 2050</b></p>	<ul style="list-style-type: none"> <li>• <b>H-1</b> <u>Plan for housing supply, forms and densities to meet the region’s current and projected needs consistent with the Regional Growth Strategy and to make significant progress towards jobs/housing balance.</u></li> <li>• <b>H-2</b> Provide a range of housing types and choices to meet the housing needs of all income levels and demographic groups within the region.</li> <li>• <b>H-6</b> Develop and provide a range of housing choices for workers at all income levels throughout the region <u>in a manner that promotes accessibility to jobs and provides opportunities to live in proximity to work that is accessible to job centers and attainable to workers at anticipated wages.</u></li> </ul>

	<ul style="list-style-type: none"> <li>• <b>H-8</b> <u>Promote the development and preservation of long-term affordable housing options in walking distance to transit by implementing zoning, regulations, and incentives.</u></li> <li>• <b>H-9</b> <u>Expand housing capacity for moderate density housing to bridge the gap between single-family and more intensive multifamily development and provide opportunities for more affordable ownership and rental housing that allows more people to live in neighborhoods across the region.</u></li> </ul>
<p><b>Countywide Planning Policies</b></p>	<ul style="list-style-type: none"> <li>• <b>HO-1</b> The county and cities shall make provisions in their comprehensive plans to accommodate existing and projected housing needs, ((including)) consistent with the Regional Growth Strategy and Snohomish County Growth Targets. Plans must include a specific assessment of housing needs by economic segment ((within the community)), as ((indicated)) described in the housing report prescribed in CPP HO-5. Those provisions should consider the following ((factors)) <u>strategies</u>:             <ol style="list-style-type: none"> <li>a. ((Avoiding)) <u>Avoid</u> further concentrations of low-income and special needs housing.</li> <li>b. ((Increasing)) <u>Increase</u> opportunities and capacity for affordable housing in in ((urban)) <u>Regional, Countywide, and local growth centers.</u></li> <li>c. ((Increasing)) <u>Increase</u> opportunities and capacity for affordable housing close to employment, education, shopping, public services, and public transit.</li> <li>d. ((Increasing)) <u>Increase</u> opportunities and capacity for affordable and special needs housing in areas where affordable housing is currently lacking.</li> <li>e. ((Supporting)) <u>Support</u> affordable housing opportunities in other Snohomish County jurisdictions, as described below in ((CPP HO-4)) <u>CPP-HO-3.</u></li> <li>f. <u>Support the creation of additional housing options in single-family neighborhoods to provide for more diverse housing types and choices to meet the various needs of all economic segments of the population.</u></li> </ol> </li> <li>• <b>HO-6</b> The county and cities should implement policies and programs that encourage ((the upgrading of neighborhoods and)) the rehabilitation and preservation of existing legally established, affordable housing <u>for residents of all income levels</u>, including but not limited to mobile/manufactured housing and single - room occupancy (SRO) housing.</li> <li>• <b>HO-14</b> The county and cities should ((provide incentives for)) <u>incentivize and promote the development and preservation of long-term affordable housing ((such as)) through the use of zoning, taxation, and other tools, including height or density bonuses, property tax incentives and parking requirement reductions.</u> The incentives should apply where feasible to encourage affordable housing.</li> <li>• <b>HO-4</b> The county and cities should implement policies that allow for the <u>development of moderate density housing to help meet future housing needs, diversify the housing stock, and provide more affordable home ownership and rental opportunities.</u> This approach should include code updates to ensure that zoning designations and allowed densities,</li> </ul>



	<p><u>housing capacity, and other restrictions do not preclude development of moderate density housing.</u></p> <ul style="list-style-type: none"> <li>• <b>DP-6</b> City and County comprehensive plans should locate employment areas and living areas in close proximity in order to maximize transportation choices, <del>((and))</del> minimize vehicle miles traveled, <del>((and to))</del> optimize <u>the use of existing and planned transportation systems and capital facilities, and improve the jobs-housing balance.</u></li> </ul>
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\* Extremely Low Income – 30 percent Area Median Income (AMI) and below, Very Low Income – 30-50 percent AMI, Low Income – 50-80 percent AMI

### High-level focus for Middle Housing policies

As noted earlier, planning is a balance between implementing state, regional, and countywide requirements with substantial local deference that is afforded to the city. As the city approaches the 2024 update to its comprehensive plan, the goal should be to focus on finding ways to implement new state laws and regional and countywide planning requirements in a way that aligns with community planning goals.

While new Housing Element requirements include identifying sufficient capacity for moderate-, low-, very low-, and extremely low-income households, the way in which that is implemented can be unique to the city.

#### Update existing Housing Element goals and policies

To provide greater consistency with updated Housing Element language and regional and countywide planning policies, consider providing additional specificity within existing goals and policies as follows:

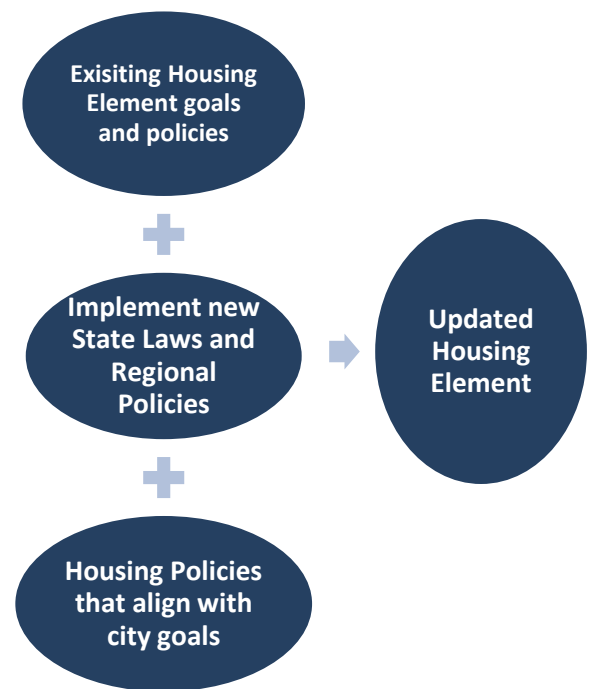


Figure 18. Process to update the Housing Element

- **HOUSING POLICY 1.04:** Pursue strategies that encourage a variety of housing choices to be developed. Examples of the types of housing that will be considered are accessory dwelling units, congregate care facilities, retirement homes, mixed-use development, multifamily complexes, inclusionary zoning, manufactured housing and homesharing.
  - Consider modifying policy to specifically identify the housing types needed to meet community needs and how that relates to providing housing at different income levels. This would include single family homes, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and consideration of duplexes, triplexes, and townhomes.

It may be appropriate to create one or more new policies given the range of housing types identified in the GMA Housing Element and different strategies that might be utilized to provide housing at different income ranges. As an example, a policy on inclusionary zoning or use of the Multi-Family Tax Exemption (MFTE) could connect to providing more affordable housing types and reduction of displacement related to the higher rents that many cannot afford. Bonus densities in single family zones for middle housing may be more focused on providing options for more affordable housing options for first time home buyers or those looking to downsize.

- **HOUSING STRATEGY 2:** As a part of the implementation of the Comprehensive Plan, continue to consider zoning mechanisms and development standards that can increase density in appropriate areas. These mechanisms include compact development, minimum densities for selected residential zone districts, planned residential development, zero lot line development and density bonuses for up-zoning. Most of these mechanisms are available in the City's development regulations and have been used in the SR 527 Corridor Subarea, as well as other areas in the City.
  - Consider modifying this policy or creating one or more additional policies to provide more specific policy guidance. As an example, if the city wants to provide density incentives for middle housing, a specific policy may be appropriate to outline the goals for doing so. This would also provide greater guidance as development regulations are updated.

The city should also consider addressing:

- Jobs/housing balance – this could be accomplished by locating housing near Bus Rapid Transit (BRT) and providing more jobs closer to housing options, such as is provided for in the Mill Creek Boulevard Sub-area plan.
- Policy(ies) that support additional housing types in single family neighborhoods - this could include middle housing, which already exists throughout the city. It could also help support new requirements for ADUs and allowing additional density on existing lots as provided for in new legislation.
- Preserving existing housing to combat displacement – this could look like providing density bonuses for preserving existing homes when redevelopment occurs or policies focused on providing renters more time to find housing when redevelopment is going to occur.
- Policy(ies) focused on concentrations of low income housing – providing more housing mixes and options, including middle housing, can reduce housing exclusion.
- Consider how current policies are currently working and/or being implemented and if adjustments or changes are necessary moving forward.

The Washington State Department of Commerce has also developed [Guidance for Updating Your Housing Element](#), which is a great tool to utilize as the Housing Element is updated. Pages 97-100 and 104-105 provide policies from other city plans that could be considered. Areas covered include providing a variety of housing types, ADUs, tiny homes, and manufactured homes, infill development, home ownership, and housing incentives or requirements.

### New Housing Goals and Policies

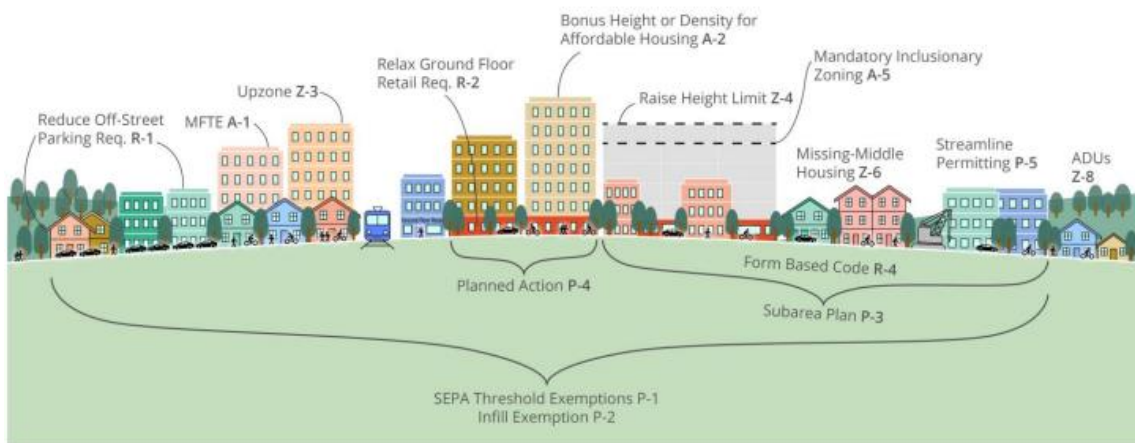
Goals and policies developed to encourage Middle Housing are typically implemented through programs and development regulations. As the city develops an approach to planning for additional Middle Housing as part of the comprehensive plan update, it will be important to develop new or revised policies that support its approach. It is recommended that this issue be revisited after the city develops an approach to accommodating growth out to 2044. Creating policies that align with a housing strategy will create a great path forward for the city.

The final deliverable for the Middle Housing Project will be a menu of strategies report. The report will outline Middle Housing strategies and actions that city could consider taking in the future. In that report, policy options will be developed and linked to the strategies and actions so there is a strong connection.

There are two specific areas which will be focused on. Options for development of larger properties that are vacant or underutilized and those that are focused on redevelopment of existing single family lots. The menu of strategies report will include a discussion of:

- Ideas to implement [HB 1337](#) which will require the city to permit at least two Accessory Dwelling Units on all residential lots and [HB 1110](#), which will require the city to allow two units per lot.
- Zoning options to increase middle housing diversity and supply.
- Incentive programs to increase middle housing diversity and supply.
- Overview of barriers to additional middle housing development and options to address those issues.

In addition to linking policy and code options the city could consider, feedback from community outreach and engagement will be incorporated. Lastly, as goals, policies, and strategies are developed, it is important to recognize that it takes a variety of options to make progress on goals, such as providing more housing options at prices that are affordable to different income levels. Figure 19 below outlines how various strategies can all work towards a common goal.



Note: The letters and numbers next to each strategy correspond to Commerce's [Guidance for Developing a Housing Action Plan](#) (2020)  
Source: MAKERS, 2020

Figure 19. Housing options working together to implement goals and policies

## VII. Anti-displacement, racially disparate impacts, and exclusion in housing – policy options, recommendations, and strategies

This section focuses on policy and code changes the city could consider addressing and begins to undo the impacts of local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing. These are new requirements that have been added to the Growth Management Act (GMA) and regional and countywide planning policies since the city last completed a major Comprehensive Plan update in 2015. This means that the current Housing Element does not address many of these issues at all, or only partially addresses them.

### State and regional and countywide policy changes – displacement and racially disparate impacts

The following table outlines some of the changes to the Housing Element and regional and countywide planning policies primarily focused on displacement, racially disparate impacts, and exclusion in housing. Underlined language indicates that it is new language that has been adopted since the last Comprehensive Plan update.

As noted earlier in this report, the regional policies in VISION 2050 were adopted in October 2020. Housing Bill 1220, which modified Housing Element requirements, was adopted in May 2021. While VISION 2050 is not required to fully address each change to state law requirements for planning, it is likely that additional policy considerations would have been made if Housing Element changes were adopted first. Therefore, there are some areas that are now addressed at the state level that may not be included in regional or countywide planning policies.

<b>Housing Element – RCW 36.70A.070(2)</b>	<ul style="list-style-type: none"> <li>• (e)(i-iii) - Includes new requirement to identify <u>local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including: (i) Zoning that may have a discriminatory effect; (ii) Disinvestment; and (iii) Infrastructure availability.</u></li> <li>• (f) Identify and implement <u>policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions.</u></li> <li>• (g) Identify <u>areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments.</u></li> <li>• (h) Establish <u>anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.</u></li> </ul>
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<b>VISION 2050</b>	<ul style="list-style-type: none"> <li>• <b>H-2</b> Provide a range of housing types and choices to meet the housing needs of all income levels and demographic groups within the region.</li> <li>• <b>H-12</b> Identify potential physical, economic, and cultural displacement of low- income households and marginalized populations that may result from planning, public investments, private redevelopment and market pressure. Use a range of strategies to mitigate displacement impacts to the extent feasible.</li> <li>• <b>Ec-12</b> Identify potential physical, economic, and cultural displacement of existing businesses that may result from redevelopment and market pressure. Use a range of strategies to mitigate displacement impacts to the extent feasible.</li> </ul>
<b>Countywide Planning Policies</b>	<ul style="list-style-type: none"> <li>• <b>HO-5. d</b> <u>Evaluate the risk of physical and economic displacement of residents, especially low-income households and marginalized populations.</u></li> <li>• <b>DP-39</b> <u>The County and cities should include measures in comprehensive plans, subarea plans, and development regulations that are intended to reduce and mitigate the impacts of displacement on marginalized residents and businesses as a result of development and redevelopment, particularly in regional, countywide, and other urban centers.</u></li> <li>• <b>ED-18</b> <u>Jurisdictions should identify the potential for physical, economic, and cultural displacement of existing locally owned, small businesses as a result of development or redevelopment and market pressure. Jurisdictions should consider a range of mitigation strategies to mitigate the impacts of displacement to the extent feasible.</u></li> </ul>

## Policy Analysis

***Report Objective 1: Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including: zoning that may have a discriminatory effect; disinvestment; and infrastructure availability.***

The Washington State Department of Commerce Racially Disparate Impacts guidance has been utilized to evaluate existing City of Mill Creek Housing policies which could result in racially disparate impacts, displacement, and exclusion in housing.

When evaluating existing Housing Element policies, the Department of Commerce suggests asking:

- Does the policy contribute to racially disparate impacts, displacement, or exclusion in housing? (For example: by making large areas of the city effectively “off-limits” to most types of housing except single-family houses?)
- Is the policy effective in accommodating more housing? If not, does it cause disparate impacts, displacement or exclusion in housing?

- Does the policy increase displacement risk? If so, can this be mitigated through policies or actions?
- Does the policy provide protection to communities of interest from displacement?

The following table includes all housing policies and evaluates them for support of inclusive housing practices as follows:

**Supportive** = supports a valid housing approach which achieves the GMA Housing Element goal for housing.

**Approaching** = supports an inclusive housing approach but could use minor changes to address racially disparate impacts, displacement, or exclusion in housing.

**Challenging** = policy could use changes or modifications to meet GMA Housing Element goals

**N/A** = Not applicable

To provide a clear in-depth picture of each housing policy, the following table connects each policy to applicable housing issues<sup>4</sup>, discusses how it addresses said issue and offers options for modification, as well as how it connects to the GMA Housing Element and regional (Multi-County Planning Policies – MPP) and countywide planning policies (CPP). The policy evaluation also considers language which has been historically utilized to marginalize certain communities. This could be policies which speak to segregating certain housing types, enforcement policies which could impact those with lower incomes to a great extent, or references to things like “community character” or other vague phrases which could communicate exclusionary housing practices.

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
<b>HOUSING GOAL 1:</b> Plan for affordable housing opportunities for all economic segments of the community.	Supportive policy - Racially disparate impacts and exclusion in housing.	Solid policy. The policy could be amended to make it clear that housing at different price points is not location dependent and that this will be supported throughout the city.	Housing Element – 36.70A.070(2)(a)(i),(2)(b)(2)(c), (2)(d)(i) and (iv) MPP - H-1, H-2, and H-9 CPP - HO-4
<b>HOUSING GOAL 2:</b> Plan for a wide variety of housing choices to accommodate all of the needs of the Mill Creek community.	Supportive policy - Racially disparate impacts and exclusion in housing.	Solid policy. The policy could be amended to make it clear that housing at different price points is not location dependent and	Housing Element – 36.70A.070(2)(a)(i), (2)(c), (2)(d)(i) and (iv) MPP - H-1, H-2, and H-9 CPP - HO-4

<sup>4</sup> Housing issues such as racially disparate impacts, exclusion in housing, and displacement.

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
		<p>that this will be supported throughout the city.</p> <p>Consider calling out housing types which provide home ownership opportunities. This includes single family detached homes, accessory dwelling units, and middle housing types.</p>	
<p><b>HOUSING GOAL 3:</b> Preserve the integrity of existing homes and neighborhoods.</p>	<p>Challenging policy - Racially disparate impacts and exclusion in housing.</p>	<p>Depending on how it is implemented, this policy has the potential to challenge the city’s ability to meet the range of housing needs in the city. As an example, preserving residential integrity may be a barrier to opening options for more affordable housing types, such as, duplexes or ADUs in residential zones. The term is undefined and may mean different things to different people and communities.</p>	<p>Housing Element - RCW 36.70A.070(2)(b)</p> <p>There does not appear to be any CPPs or MPPs which focus on this issue.</p>
<p><b>RESIDENTIAL DEVELOPMENT GOAL 1:</b> Ensure quality housing and a safe, healthful and aesthetically pleasing living environment for all residents of the community.</p>	<p>Approaching policy - Racially disparate impacts and exclusion in housing.</p>	<p>Consider revising the goal to remove or better define terms such as safe and aesthetically pleasing. These terms mean different things to different people with different experiences and backgrounds. Many cultures may believe aesthetically pleasing neighborhoods might mean more dense housing while others may interpret this to mean single family homes on large lots. Safety in</p>	<p>There does not appear to be any Housing Element, CPPs or MPPs which focus on this issue.</p>

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
		housing also often gets associated with lower density housing. The goal is to make sure that policies are very clear and represent the community goals.	
<p><b>RESIDENTIAL DEVELOPMENT GOAL 2:</b> Regulate residential development to ensure moderate, well-planned growth, which can be assimilated with minimal disruption and inconvenience to existing residents and facilities.</p>	Policy not applicable for this analysis		
<p><b>RESIDENTIAL DEVELOPMENT GOAL 3:</b> Ensure that residential development occurs within a range of densities that preserves the existing housing stock, is compatible with surrounding land uses, and provides for a variety of housing types.</p>	Approaching policy - Racially disparate impacts and exclusion in housing.	<p>Consider modifying the policy to “Ensure that residential development <del>occurs within a range of densities that preserves the</del> <u>is incentivized to preserve existing housing stock during redevelopment, is compatible with surrounding land uses, and provides for a variety of housing types for different income levels.</u></p> <p>Consider removing policy language, in some instances, regarding compatibility with surrounding land uses. Compatibility is a subjective term and over time communities and neighborhoods will change. If modified, this could assist with addressing displacement.</p>	<p>Housing Element - RCW 36.70A.070(2)(b)-(c) MPP – H-1, H-2, H-9 CPP - HO-1, HO-4</p>
<p><b>RESIDENTIAL DEVELOPMENT GOAL 4:</b> Create well designed, compact medium and high</p>	Supportive policy - Racially	Great policy. Could consider adding a reference to	Housing Element – 36.70A.070(2)(a)(i),



Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
density residential neighborhoods in appropriate locations, within close proximity to commercial areas that offer facilities, transit, and other urban services.	disparate impacts and exclusion in housing.	housing that is affordable to various income levels.	(2)(c), (2)(d)(i), (iii), and (iv), (2)(e)-(h) MPP - H-1, H-2, and H-9 CPP – DP-6
<b>MIXED USE DEVELOPMENT GOAL 1:</b> In areas where there is access to transit and opportunities for pedestrian activity, encourage compact, well-defined mixed-use neighborhoods with a strong sense of place.	Supportive policy - Racially disparate impacts and exclusion in housing.	Great policy. If the term “strong sense of place” is utilized, consider defining the term to ensure it is supportive of people and groups who may define differently define what a “strong sense of place” is.	Housing Element – 36.70A.070(2)(d)(iii) MPP - H-1, H-2, and H-9 CPP - DP-6
<b>MIXED USE DEVELOPMENT GOAL 2:</b> Mixed-use development shall include high-density residential uses integrated with retail uses, office uses and efficient and safe public open spaces/plazas appropriately sized for the development and the surrounding neighborhoods.	Supportive policy - Racially disparate impacts and exclusion in housing.	Great policy. Could consider adding a reference to housing that is affordable to various income levels.	Housing Element – 36.70A.070(2)(d)(iii) MPP - H-1, H-2, and H-9 CPP - DP-6
<b>MIXED USE DEVELOPMENT GOAL 3:</b> Design mixed-use development with pedestrian connections and convenient access to transit facilities, resulting in reduced vehicle trips and a more walkable, livable environment.	Supportive policy - Racially disparate impacts and exclusion in housing.	Great policy. If affordability could be included as a component of this policy it could highlight how the city invests in neighborhoods of varying housing types <u>and</u> <u>income levels</u> which is great for housing equality.	Housing Element – 36.70A.070(2)(d)(iii) MPP - H-1, H-2, and H-9 CPP - DP-6
<b>MIXED USE DEVELOPMENT GOAL 4:</b> Integrate mixed-use development with adjacent existing residential neighborhoods and the natural environment.	Supportive policy - Racially disparate impacts and exclusion in housing.	Great policy. This policy supports not segregating different types of housing in different parts of the city with provides more equitable outcomes. Policy would be stronger if it included an affordability component such as “Integrate mix-use development, which	Housing Element – 36.70A.070(2)(a)(i), (2)(c), (2)(d)(i), (iii), and (iv), (2)(e)-(h) MPP - H-1, H-2, and H-9 CPP – DP-6

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
		provides housing to those with low, very low, extremely low, and moderate-incomes with adjacent existing residential neighborhoods and the natural environment.	
<b>MIXED USE DEVELOPMENT GOAL 5:</b> Utilize buffers or other design features to ensure that mixed-use development is compatible with adjacent land uses.	Policy not applicable for this analysis		
<b>MIXED USE DEVELOPMENT GOAL 6:</b> Encourage development that incorporates green building practices, includes efficient infrastructure design, and provides a variety of housing opportunities and choices available to a range of income levels, family sizes and lifestyles.	Supportive policy - Racially disparate impacts and exclusion in housing.	Great policy. Could consider expanding this policy so it applies to all housing development, not just mixed use.	Housing Element – 36.70A.070(2)(a)(i), (2)(c), (2)(d)(i), (iii), and (iv), (2)(e)-(h) MPP - H-1, H-2, and H-6 CPP – HO-4, DP-6
<b>MIXED USE DEVELOPMENT GOAL 7:</b> Review the zone districts to determine if mixed use development is appropriate, especially in areas of the City likely to redevelop in the next 20 years.	Policy not applicable for this analysis		
<b>EAST GATEWAY VILLAGE GOAL 1:</b> Create a well-designed Urban Village that is pedestrian friendly and transit oriented.	Policy not applicable for this analysis		
<b>EAST GATEWAY VILLAGE GOAL 2:</b> Create a strong identity for the Urban Village that includes a diverse mix of marketable commercial, public, institutional uses and residential densities.	Supportive policy - Racially disparate impacts and exclusion in housing.	Great policy. Consider adding an affordability component to this policy. It could highlight how the city provides housing for all income levels which is great for housing equality.	Housing Element – 36.70A.070(2)(d)(iii) MPP - H-1
<b>EAST GATEWAY VILLAGE GOAL 4:</b> Create an Urban Village that incorporates and complements existing land uses and residential neighborhoods within the planning area and minimizes negative environmental impacts.	Approaching policy - Racially disparate impacts and	Considering revising policy to read “Create an Urban Village that incorporates <del>and complements existing</del> land uses and residential	Housing Element – 36.70A.070(2)(d)(iii) MPP - H-1 CPP-HO-1, DP-6

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
	exclusion in housing.	<p>neighborhoods within the planning area and <u>mitigates</u> <del>minimizes negative</del> environmental impacts.</p> <p>This would remove subjective language which is up for interpretations and could mean something different to different people and communities.</p>	
<p><b>EAST GATEWAY VILLAGE GOAL 5:</b> Incorporate medium and high density residential neighborhoods to create a “critical mass” to support commercial services within the Urban Village.</p>	Supportive policy - Racially disparate impacts and exclusion in housing.	<p>Great policy. If other policies are modified to address affordability levels, then this policy should not have to be adjusted to bring in housing affordability.</p> <p>One consideration would be to modify the policy to read “Incorporate medium and high density residential neighborhoods to <del>create a</del> “critical mass” to support commercial services within the Urban Village.</p> <p>The term “critical mass” is subjective and probably not necessary.</p>	<p>Housing Element – 36.70A.070(2)(a)-(d)</p> <p>MPP – H-1, H-2, and H-6</p> <p>CPP – HO-4</p>
<p><b>RESIDENTIAL POLICY 1.01:</b> Maintain the residential character of the City by providing a range of residential densities while maintaining and enhancing the City as a predominantly single-family residential community.</p>	Challenging policy - Racially disparate impacts and exclusion in housing.	<p>Residential character means different things to different people and communities. Consider removing this from the policy.</p> <p>In addition, the city already provides a variety of housing types and will be required to plan for a greater variety in all areas</p>	Current policy does not really align with Housing Element or CPP/MPP.

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
		<p>of the city as part of this update.</p> <p>The policy, as currently worded, could be interpreted to lead to exclusionary housing practices. This policy could be refreshed to remove ambiguous language, reflect actual housing types in the city, and look forward to what the city is supporting as it grows.</p>	
<p><b>RESIDENTIAL POLICY 1.02:</b> Continue to implement the original Planned Residential Development master plan adopted by Snohomish County, and by the City upon incorporation, where appropriate. Amendment requests to the original Master Plan land use designations shall be evaluated for consistency with the appropriate land use locational criteria set forth in the Land Use Element.</p>	<p>Policy not applicable for this analysis</p>		
<p><b>RESIDENTIAL POLICY 1.03:</b> The City's existing residential development pattern is configured with the higher densities located along the SR 527 corridor, north of the Town Center and south of the Gateway shopping center. Medium to low densities are dispersed to established residential neighborhoods or higher intensity activity areas. If the City expands, continue this pattern of higher densities locating near designated neighborhood centers.</p>	<p>Approaching policy - Racially disparate impacts and exclusion in housing.</p>	<p>This policy could be updated to reflect current growth patterns. It should also be updated to better implement having mixed housing types in residential neighborhoods at least to the extent of implementing HB 1110 and 1337.</p>	<p>Housing Element – 36.70A.070(2)(b)-(c) MPP – H-1, H-2, and H-6 CPP – HO-4</p>
<p><b>RESIDENTIAL POLICY 1.04:</b> Ensure that new residential development is compatible with surrounding land uses in height, scale and design and is in character with the high quality of development in the City. Incorporate design guidelines and strategies such as those</p>	<p>Approaching policy - Racially disparate impacts and exclusion in housing.</p>	<p>The current policy could exclude new policies being put in place to implement HB 1110, HB 1337, or for providing more middle housing options.</p>	<p>State laws and regional and countywide planning policies are not focused on compatibility issues.</p>

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
<p>included in the City’s Development Code (Chapter 17.34) into the design of new subdivisions.</p>		<p>While it is important to provide compatibility, it shouldn’t come at the cost of not adapting as the city grows. Consider the following policy change:</p> <p><del>Ensure that new residential development is compatible with surrounding land uses in height, scale and design and is in character with the high quality of development in the City. To mitigate the impacts of development or redevelopment adjacent to existing neighborhoods,</del></p> <p>Incorporate design guidelines and strategies such as those included in the City’s Development Code (Chapter 17.34) into the design of new subdivisions <u>and development.</u></p>	
<p><b>RESIDENTIAL POLICY 1.05:</b> Mixed Use/High-Density residential land uses of up to 24 dwelling units per acre are appropriate between Seattle Hill Road and 173rd Street SE on the east side of SR 527 and just south of 146th Street SE on the west side of SR 527. Housing types associated with this density category should include multifamily attached housing in the form of condominiums, apartments and townhouses. Single-family attached and detached are also appropriate housing types. Multifamily residential uses planned to front on the primary access road are encouraged to provide office and/or retail uses on the ground floor with residential units above. This mixed-use approach is intended to</p>	<p>Policy not applicable for this analysis.</p> <p>Densities will be reviewed, however, as part of the comprehensive plan update.</p>		

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
<p>blend the office and commercial uses into the primary street corridor of surrounding residential neighborhoods. High-density residential developments that include ground floor retail or office uses may achieve a maximum residential density of 30 dwelling units per acre.</p>			
<p><b>RESIDENTIAL POLICY 1.06:</b> Medium and high density residential development is allowed within the East Gateway Urban Village situated on the south side of the SR 96 corridor east of 35th Avenue SE and west of Seattle Hill Road. In the area adjacent to existing low density land uses to the south, residential development should be appropriately scaled to ensure compatibility with the existing residences. High density residential above retail and/or offices uses shall be encouraged in the areas designated on the development plan as mixed-use.</p>	<p>Policy not applicable for this analysis.</p> <p>Densities will be reviewed, however, as part of the comprehensive plan update.</p>		
<p><b>RESIDENTIAL POLICY 1.07:</b> The current site of the Pacific Topsoils operation, located east of 35th Avenue SE is suitable for medium-density residential development. Representative housing types include multifamily attached units, townhouses and single-family units on smaller lots with densities ranging between 5 and 12 dwelling units per acre.</p>	<p>Policy not applicable for this analysis.</p> <p>Densities will be reviewed, however, as part of the comprehensive plan update.</p> <p>Note that some of the housing types listed in this policy may not align with the densities provided for.</p>		
<p><b>RESIDENTIAL POLICY 1.08:</b> Provide low-density residential development that does not exceed</p>		<p>Note: This policy can be removed. It does not align</p>	

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
four (4) units per acre in single-family residential neighborhoods. Single-family detached and attached uses are typical low-density residential housing types.		with current residential allowed densities. The city will also need to work in allowances for ADUs and multi-unit housing in residential zones.	
<b>RESIDENTIAL POLICY 1.09:</b> Consider establishing future land use designations on properties in the City's MUGA that currently do not have designations.	Policy not applicable for this analysis.		
<b>RESIDENTIAL POLICY 1.10:</b> Coordinate future development adjacent to 35th Avenue SE, Seattle Hill Road, and SR 96 with any planned transportation improvements to the roadways and the Streetscape Element of the Comprehensive Plan.	Policy not applicable for this analysis.		
<p><b>RESIDENTIAL POLICY 1.11:</b> Require appropriately sized property buffers along the peripheral boundaries of residential development if the proposed development is a higher density than the existing development. These vegetated areas provide neighborhood and development identity; provide wildlife habitat corridors; provide pedestrian linkage to other residential developments and activity areas and protect residential areas from visual and audible disturbances. Where appropriate, use topographic change and natural areas to separate developments and to reinforce this identity.</p> <p>Require future residential development to be planned and designed to accomplish an identifiable neighborhood character. Require entrances to residential areas to be clearly identifiable and aesthetically pleasing. Design arterial and collector streets in residential areas to include roadway buffers consistent with the Streetscape Element to provide consistent streetscape character with the</p>	Approaching policy - Racially disparate impacts and exclusion in housing.	Consider removing the term “accomplish an identifiable neighborhood character”. This is another term that is subjective and means different things to different people and communities.	State laws and regional and countywide planning policies are not focused on compatibility issues.

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
<p>existing developed areas of the City. When developing neighborhoods, preserve elements of environmentally sensitive areas, existing vegetation and natural grades, underground utilities, building mass in scale with lot sizes, safe and efficient pedestrian and vehicular circulation and useable open space.</p>			
<p><b>RESIDENTIAL POLICY 1.12:</b> Require the design of new residential developments to be compatible with similar uses and structures located within the subdivision or development as well as with adjacent developments. Measure compatibility in terms of structural mass, exterior building materials, landscaping and screening, vehicular and pedestrian circulation and similar restrictive covenants where appropriate.</p>	<p>Approaching policy - Racially disparate impacts and exclusion in housing.</p>	<p>This is another policy the city should consider modifying. The city may be planning for greater allowance of middle housing and ADUs that may not be located on adjacent developments.</p> <p>In addition, the Comprehensive Plan is forward looking and therefore basing future development on what is existing may not align with planning goals. Ok to have design standards, but they shouldn't limit providing for housing types needed to meet Housing Element requirements of regional or countywide planning policies.</p>	<p>State laws and regional and countywide planning policies are not focused on compatibility issues.</p>
<p><b>RESIDENTIAL POLICY 1.13:</b> Locate group homes, congregate care facilities, day care centers and like uses in appropriate areas consistent with the locational criteria so as to be compatible with surrounding residential neighborhoods.</p>	<p>Please see Commerce checklist for state requirements for locational criteria. Has been amended since last</p>		<p>Housing Element – 36.70A.070(2)(c)</p>



Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
	comprehensive plan update.		
<p><b>TOWN CENTER POLICY 3.01:</b> The Town Center site is located generally south of an extension of 149th Street SE, west of SR 527 and east of the North Creek Greenway. The Town Center is a well-designed mixed-use development that establishes an extension of the existing commercial area along the SR 527 corridor. Town Center is a pedestrian and transit friendly development, with pedestrian linkages to existing neighborhoods, the original commercial along the SR 527 corridor and the North Creek Trail. To this end, the Town Center Design Guidelines were adopted by the City Council (originally adopted in 1997, and subsequently amended in 2000 and 2003). The primary goals of the Town Center Design Guidelines are as follows:</p> <ul style="list-style-type: none"> <li>• Maintain density and a diverse mix of uses in the center.</li> <li>• Encourage a Town Center that is strongly pedestrian oriented and transit friendly.</li> <li>• Preserve a strong identity for the Mill Creek Town Center.</li> <li>• Maintain places that provide for the needs of a diverse population of different ages.</li> <li>• Integrate the Town Center with existing commercial development and the surrounding natural environment.</li> </ul> <p>The Design Guidelines control the aesthetic components of the Town Center including site design and site features, landscaping, building architecture, public plazas, streets, sidewalks, parking areas and signage.</p> <p>Implementation of this policy has occurred through the application of the Planned</p>	Policy not applicable for this analysis as Master Plan has already been implemented and Town Center has been built out.		

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
<p>Community Business zone district, which requires a Master Development Permit for the development of the site.</p>			
<p><b>EAST GATEWAY URBAN VILLAGE POLICIES</b>  <b>4.01:</b> The East Gateway Urban Village is located generally south of 132nd Street SE between 35th Avenue SE and Seattle Hill Road. The primary goals of the East Gateway Urban Village are as follows:</p> <ul style="list-style-type: none"> <li>• Encourage density and a diverse mix of uses in the center.</li> <li>• Create a strongly pedestrian oriented and transit friendly development.</li> <li>• Create strong identity for the East Gateway Urban Village.</li> <li>• Encourage the development of a sustainable neighborhood supported by a diversity of businesses and types of residential development.</li> <li>• Create a safe and efficient transportation network through the entire site to move goods and services as well as customers, employees, and residents. The transportation network shall have controlled access points onto SR 96 and Seattle Hill Road in accordance with access management policies in the Transportation Element.</li> <li>• Create places that provide for the needs of a diverse population of different ages.</li> <li>• Provide for adequate buffers and trails around the perimeter of the East Gateway Urban Village to enhance pedestrian connectivity between uses while minimizing impacts to existing surrounding uses.</li> <li>• Protect the existing adjacent property uses by developing design guidelines that incorporate design techniques such as limiting</li> </ul>	<p>Approaching policy - Racially disparate impacts and exclusion in housing.</p>	<p>Consider adding to this policy to address jobs/housing balance, providing housing for different income levels, and options to incentivize or require affordable housing.</p> <p>These could be policy options to help support the amount of affordable housing types below 80 percent AMI that the city will be planning for as part of the comprehensive plan update. It would also implement new Housing Element requirements to a greater degree.</p>	<p>Housing Element – 36.70A.070(2)(a)(i), (2)(c), (2)(d)(i), (iii)</p> <p>MPP - H-1, H-2, and H-6</p> <p>CPP – DP-6</p>

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
<p>light from spilling onto adjacent properties and limiting building heights.</p> <p>Realization of these goals will occur through the application of the East Gateway Urban Village zone district, which requires a Master Development Permit for the development of the site. One of the requirements of the Master Development Permit is consistency with the Design Guidelines, which will control the aesthetic components of the site design and site features including but not limited to; landscaping, building architecture, public plazas, streets, sidewalks, parking areas and signage.</p>			
<p><b>EAST GATEWAY URBAN VILLAGE POLICIES 4.02:</b> Require an urban character in the design of the East Gateway Urban Village with a wide mix of uses that generally cater to the local residents in the City and its MUGA. Coordinate the building design, signage, lights and landscaping to enhance the character of the East Gateway Urban Village. Public places for people of all ages to gather such as a public park, plaza, a village green or square, or a fountain should be the focal point.</p>	<p>Policy not applicable for this analysis.</p> <p>However, consider defining what character means or utilize different terminology.</p>		
<p><b>EAST GATEWAY URBAN VILLAGE POLICIES 4.03:</b> Encourage mixed-use buildings with residences or offices over first floor commercial and orient these buildings toward the public realm of streets and open spaces whenever possible.</p>	<p>Policy not applicable for this analysis.</p>		
<p><b>EAST GATEWAY URBAN VILLAGE POLICIES 4.05:</b> Incorporate dense, high quality housing types at various scales in the East Gateway Urban Village, with up to three stories allowed adjacent to existing residential development outside the East Gateway Urban Village and up to four stories of housing over one-story of ground floor retail/office allowed otherwise.</p>	<p>Supportive policy - Racially disparate impacts and exclusion in housing.</p>	<p>Great policy. Consider adding an affordability component to this policy. It could highlight how the city provides housing for all income levels which is great for housing equality.</p>	<p>Housing Element – 36.70A.070(2)(d)(iii)</p>

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
<p><b>EAST GATEWAY URBAN VILLAGE POLICIES</b>  <b>4.06:</b> Incorporate sustainable design principles such as those set forth in Leadership in Energy and Environmental Design (LEED) certification requirements in the design of neighborhoods, buildings, streets and stormwater facilities in the designated East Gateway Urban Village. Said design principles shall focus on pedestrian-scale neighborhoods, a strong relationship of buildings and open space to the public realm of streets, connectivity to surrounding uses, high quality aesthetic design, and compatibility with adjacent uses.</p>	<p>Policy not applicable for this analysis.</p>		
<p><b>HOUSING POLICY 1.01</b> Work with the development community to encourage affordable housing within the City.</p>	<p>Supporting policy - Racially disparate impacts and exclusion in housing.</p>	<p>Great policy. Consider updating with language that reflects updates to the Housing Element more closely. Also consider how the city will encourage affordable housing.</p>	<p>Housing Element – 36.70A.070(2)(c), (2)(d)(i), (iii).                      MPP - H-1, H-2, and H-6                      CPP – HO-4</p>
<p><b>HOUSING POLICY 1.02</b> Cooperate with surrounding jurisdictions and the County to provide housing for all economic segments of the community.</p>	<p>Supporting policy - Racially disparate impacts and exclusion in housing.</p>	<p>Great policy</p>	<p>This is more of a regional policy.</p>
<p><b>HOUSING POLICY 1.03</b> Work with Snohomish County and other cities and towns in the County to develop a methodology that fairly allocates affordable housing throughout the County.</p>	<p>While this is an important policy, it is not applicable for this analysis.</p>		
<p><b>HOUSING POLICY 1.04</b> Pursue strategies that encourage a variety of housing choices to be developed. Examples of the types of housing that will be considered are accessory dwelling units, congregate care facilities, retirement homes, mixed-use development, multifamily complexes, inclusionary zoning, manufactured housing and homesharing.</p>	<p>Supporting policy - Racially disparate impacts and exclusion in housing.</p>	<p>Consider modifying to align with updated Housing Element. Also, consider what those strategies might be so there is an implementation strategy.</p>	<p>Housing Element – 36.70A.070(2)(b), (c), (2)(d)(i), (iii).                      MPP - H-1, H-2, and H-6                      CPP – HO-4</p>

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
<p><b>HOUSING POLICY 1.05</b> Strive to accommodate the special needs of various segments of the community including the elderly, developmentally disabled, physically handicapped and others with housing needs. Support the principle that fair and equal access to housing is available to all persons regardless of race, color, religion, gender, sexual orientation, age, national origin, familial status, source of income, or disability.</p>	<p>Supporting policy - Racially disparate impacts and exclusion in housing.</p>	<p>Great policy. Consider adding some action to the policy so it is well understood what the city is going to do to achieve this policy.</p>	
<p><b>HOUSING POLICY 1.06</b> Take steps to ensure that development regulations and housing policies will preserve existing residential neighborhoods.</p>	<p>Challenging policy - Racially disparate impacts and exclusion in housing.</p>	<p>It is difficult to understand how this policy fits in with providing a variety of densities and housing types throughout the city. Could consider modifying to make it clear that in Mill Creek, residential neighborhoods include providing for a variety of different housing types. That would more reflect current conditions and be more consistent with new state laws, including HB 1337.</p>	<p>Current policy does not appear to align with the Housing Element or regional or countywide planning policies.</p>
<p><b>HOUSING POLICY 1.07</b> Consider the effect new regulations will have on existing residential neighborhoods as well as the impact on future construction within the community, prior to enacting changes in the zoning and development codes.</p>		<p>It is difficult to understand what this policy means or how it would be implemented. Consider removing this policy or modifying it to provide clarity.</p>	
<p><b>HOUSING STRATEGY 1:</b> Participate in regional discussions on how to plan for adequate affordable housing for very low, low, moderate and middle income households consistent with the Countywide Planning Policies. The City’s participation in the Alliance for Housing Affordability provides opportunities to work toward a common, regional goal of a wider</p>	<p>While this is an important policy, it is not applicable for this analysis.</p>		

Policy	Policy evaluation and issue(s) it links to	How Policy Addresses Housing Issue – Options to Modify	Housing Element requirement, MPP or CPP implemented/partially implemented with current policy
<p>variety of housing choices countywide. Participate in the development of any countywide monitoring program that will determine the countywide status of housing.</p>			
<p><b>HOUSING STRATEGY 2:</b> As a part of the implementation of the Comprehensive Plan, continue to consider zoning mechanisms and development standards that can increase density in appropriate areas. These mechanisms include compact development, minimum densities for selected residential zone districts, planned residential development, zero lot line development and density bonuses for up-zoning. Most of these mechanisms are available in the City’s development regulations and have been used in the SR 527 Corridor Subarea, as well as other areas in the City.</p>	<p>Supporting policy - Racially disparate impacts and exclusion in housing.</p>	<p>Great policy. Can be used as a policy to support providing for a variety of housing types at various income levels.</p>	<p>Housing Element – 36.70A.070(2)(a)(b), (c), (2)(d)(i), (iii). MPP - H-1, H-2, and H-6 CPP – HO-4</p>
<p><b>HOUSING STRATEGY 3:</b> Continue to include provisions in the zoning code to implement strategies that encourage affordable housing and provide housing for special needs populations such as mixed-use development, congregate care facilities, retirement homes, accessory dwelling units and inclusionary zoning.</p>	<p>Supporting policy - Racially disparate impacts and exclusion in housing.</p>	<p>Great policy.</p>	<p>Housing Element – 36.70A.070(2)(b), (c), (2)(d)(i), (iii). MPP - H-1, H-2, and H-6 CPP – HO-4</p>

**Additional policy areas to meet new requirements**

In addition to demonstrating how existing housing policies meet or could be modified to address new or existing requirements, there are areas where the city may need to add additional goals and policies. The following areas should be reviewed:

- Through Snohomish County Tomorrow (SCT), the City of Mill Creek will receive a housing unit allocation, broken down by income band. The city may want to develop policies affirmatively outlining how that housing capacity provides for the existing and projected housing needs (See RCW 36.70A.070(2)(a)). This may include policy support for different programs, such as Multi-Family Tax Exemption (MFTE), which can be utilized to provide housing that is affordable to people at different ranges of Area Median Income (AMI).

- The current Housing Element does provide policy support for providing emergency housing, emergency shelters, and permanent supportive housing. However, there will actually be an allocation for these uses from SCT which the city will have to plan for. Policy support will need to be matched up with new state laws (HB 1220), which require that indoor emergency shelters and indoor emergency housing be allowed in any zones in which hotels are allowed.
- The current Housing Element does not include policies, other than housing preservation, focused on displacement. While displacement is not a large issue for the city, both displacement of businesses resulting from redevelopment and displacement due to higher rents, will occur. Options to address displacement could include programs for tenant protections, land disposition policies, inclusionary zoning, or incentives to provide more affordable housing options. (See RCW 36.70A.070(2)(h)).
- New policy or policies should be developed to focus on “...programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations.” (RCW 36.70A.070(d)(ii))
- New or revised housing policies should provide support for providing capacity for all of the following: “...government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes.” (RCW 36.70A.070(c))

Note that where new goals and policies are identified, it is understood that new programs or development regulations may be required. The following outlines topical areas where new goals and policies may be warranted. Specific policy language should align with how the city plans to implement new policy direction.

### **Code options to implement new or revised housing policies**

As a follow-up to this report, a suite of code options to implement new housing requirements will be developed. This will provide the city a menu of strategies that could be utilized as part of the 2024 comprehensive plan update.

This will include options that focus on development of larger parcels as well as options focused on redevelopment of lots with existing single-family homes. This will also include analysis on [HB 1337](#) and [HB 1110](#), which passed during the 2023 legislative session and requires the city to permit two Accessory Dwelling Units on each residential lot (except in limited circumstances).

## VIII. Displacement Risk Analysis

**Report Objective 2: Identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations.**

Based upon PSRC mapping, the City of Mill Creek is at moderate to low risk for significant displacement. Proactive policies can be developed to get ahead of these issues and to be ready when displacement occurs. The City already has policies that are proactive in this way, such as allowing middle housing in residential zones, which tend to be more affordable and can be built at a higher density than detached single family homes.

### Findings

- Mill Creek will need to make changes to its comprehensive plan and additions to its zoning regulations to accommodate projected growth.
- There are about 45 acres of gross buildable/redevelopable land in the City (per Buildable Lands Report performed by Snohomish County 2021) that, with certain zoning code changes, could likely help offset any displacement and accommodate for future growth.
- Some business displacement may result from some of the potential land use changes. The City should consider economic development policies in its comprehensive plan update to assist businesses with displacement.

**Report Objective 3: Evaluate displacement risk of very low, low, and moderate-income households.**

To evaluate risk for displacement, there are many risk indicators that can reveal possible past displacements or trends that may indicate future displacement risk. Some displacement risk indicators that were utilized in analysis of displacement risk of very low, low, and moderate-income households analysis were:

- a) [Household Income](#)
- b) [Housing Cost Burden](#)
- c) Affordability of Rental Housing

### **Household Income**

#### How this indicator relates to displacement

Household income is not by itself an indicator of displacement risk; rather, it is a factor that feeds into the calculation of displacement risk and provides outside context for how the community is changing.



**Analysis**

Analysis for the City of Mill Creek was based on HUD data showing a total of 8,360 occupied housing units (households) estimated from HUD-CHAS data collected from 2015-2019. Of these, 60.2 percent are owner occupied and 39.8 percent are renter occupied.

Household membership in HAMFI income brackets has changed little since 2005, see Figure 20. The two brackets with the most change were Low Incomes, at negative 4.4 percent change, and Moderate Incomes, at positive 4.8 percent change.

Further evaluation of the income bracket data, in Figure 21 and Figure 21, reveals differences in income brackets between owner and renter-occupied households.

Renting households had the most notable change with a 16.5 percent decrease in the percentage of Low Income households, this decrease was accompanied by increases of 7.8 percent for Very Low Incomes and 6.6 percent for Moderate Incomes. Owner households have experienced little change, the portion of households making more than HAMFI Median income decreased by approximately 4.8 percent between 2005 and 2019. In Owner-occupied households, there were no income brackets that grew substantially relative to the others over the period of analysis.

The reduced percentage of renting households with Low Incomes (greater than 50 percent but less than or equal to 80 percent of HAMFI) and increased percentages in the two adjacent brackets (Very Low and Moderate Incomes) indicates a growing wage gap within Mill Creek Households. Households with

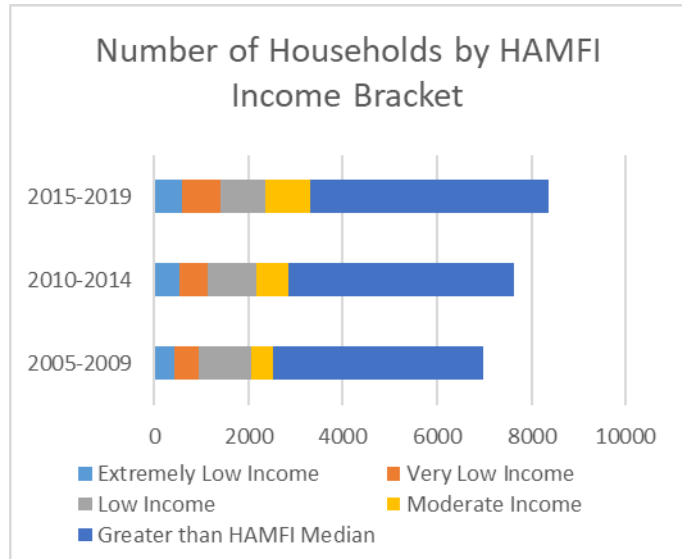


Figure 20. Number of Households by HAMFI Income Bracket  
Source: HUD-CHAS Data (Table 8)

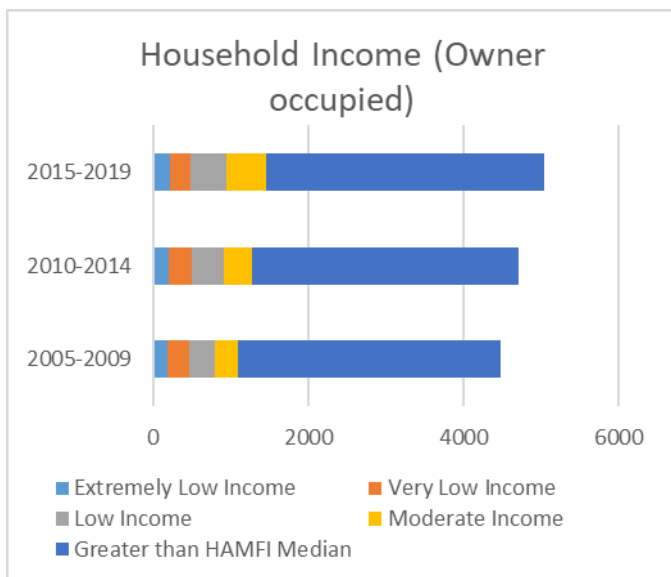


Figure 22. Household Income (Owner occupied)  
Source: HUD-CHAS Data (Table 8)

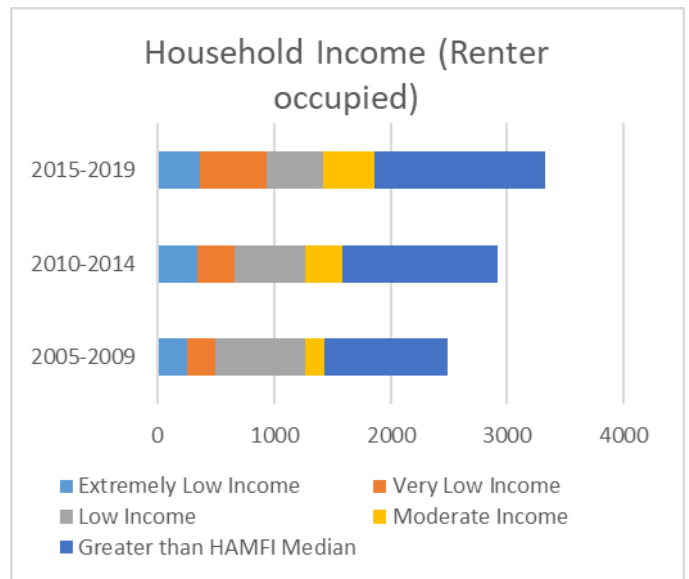


Figure 21. Household Income (Renter occupied)  
Source: HUD-CHAS Data (Table 8)

moderate to high incomes are making more, and households which previously would have had low incomes have not had wage growth which matches that of the Median Family Income affecting the area.

When comparing renter and owner households, it is apparent that renter households tend to have lower incomes. In addition to this, renter households outnumber owner households in income brackets making less than 50 percent HAMFI (Very Low and Extremely Low Incomes). In Figure 23, the number of renter households below 50 percent HAMFI income has been steadily increasing from 2005 to 2019 and have nearly doubled the number of owners with similar incomes. This is an overrepresentation of renters in lower income brackets which can indicate a lack of affordable owner options or the displacement of owner residents to rental housing.

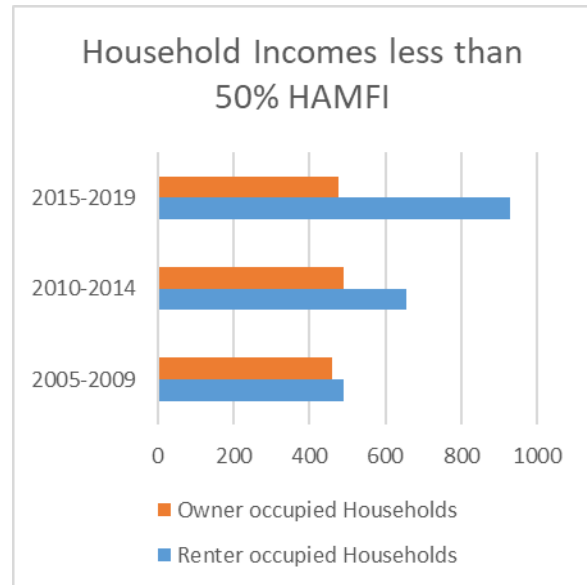


Figure 23. Household Incomes less than 50% HAMFI  
Source: HUD-CHAS Data (Table 8)

### Household Income Findings

- Overall, the percentage of low-income households have decreased, and moderate-income households have increased.
- Households with moderate to high incomes are making more, and households which previously would have had low incomes have not had wage growth which matches that of the Median Family Income affecting the area.
- The number of renter-occupied households with incomes less than 50% HAMFI (Very Low and Extremely Low Incomes) is disproportionately higher than owner-occupied households and has been increasing quickly, potentially due to lack of affordable owner-occupied housing.

## Housing Cost Burden

HUD considers a household to be housing cost burdened if they spend more than 30 percent of their income on housing costs, which can include mortgage payments and property taxes (for owner households), rent (for renter households), and utilities (for all households). A household is *severely* housing cost burdened if they spend more than 50 percent of their income on housing costs.

### How this indicator relates to displacement

Housing cost burden increases the risk of displacement in multiple ways. As more of a household's income goes to housing, they have less money to spend on other essentials such as food and transportation. Cost-burdened households may choose to move to a more affordable area or they may be forced to move -- by eviction or foreclosure -- as a result of their inability to continue paying for housing. Severely housing cost burdened households in the lowest income categories generally at the greatest risk of displacement with higher potential to become homeless.

Housing cost burden is an indicator of **indirect/economic displacement**, as increasing levels of housing cost burden can ultimately force people out of their home, their neighborhood, or even the city.

### Analysis

As seen in Figure 24, between 2005 and 2019, the percentage of cost burdened households (x-axis) has generally decreased by 4.8 percent and the percentage of severely cost burdened households has nominally decreased by 0.9 percent. In the 2005-2009 HUD-CHAS data, about 33 percent of Mill Creek households were cost burdened and in the 2015-2019 HUD-CHAS data that number had decreased to 26 percent of households.

Between renter and owner-occupied households there is a significant difference in the distribution of cost-burden over the period of analysis. The percentage of owner-occupied households experiencing some level of cost-burden (Figure 25) decreased from 28 percent to 16 percent, while renter-occupied households (Figure 26) have averaged above 40 percent of households experiencing cost burden with little change.

Furthermore, owner-occupied households have seen a decrease in both cost burden and severe cost burden while renter-occupied households have seen a shift from the majority of households being cost burdened (>30 percent and <=50 percent of income) to the majority of households being severely cost burdened (>50 percent of income).

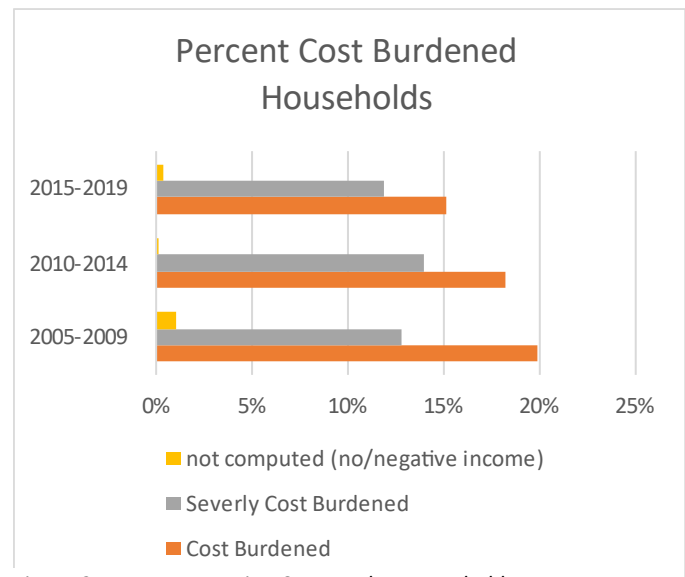


Figure 24. Percent Housing Cost Burden Households  
Source: HUD-CHAS Data (Table 8)

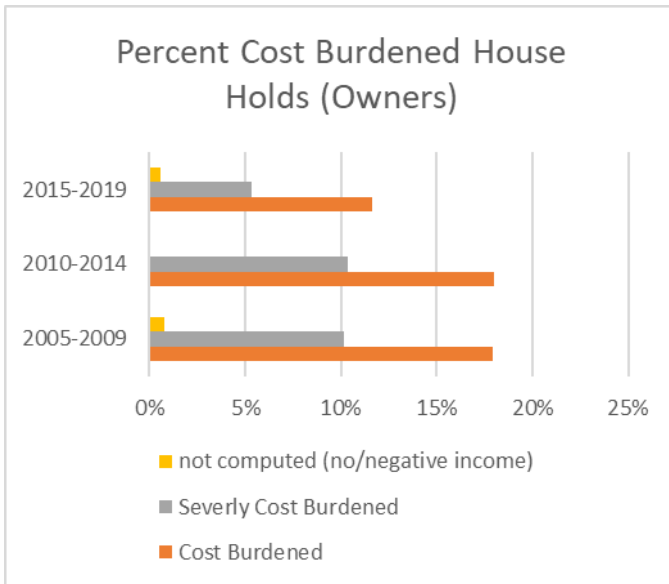


Figure 25. Percent Cost Burdened House Holds (Owners)  
Source: HUD-CHAS Data (Table 8)

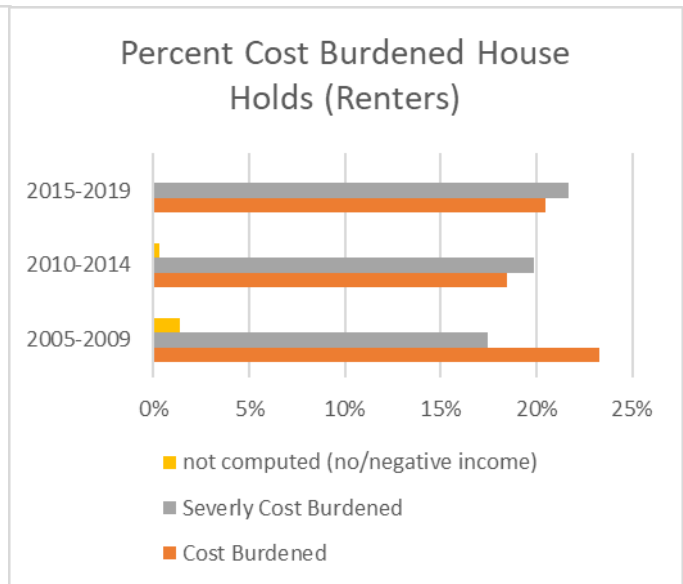


Figure 26. Percent Cost Burdened House Holds (Renters)  
Source: HUD-CHAS Data (Table 8)

The number of all cost burdened households (housing cost greater than 30 percent income, see Figure 28) changed very little over the period of analysis, with a difference of 20 households between the 2005-2009 and 2015-2019 HUD-CHAS data. This is a decreasing rate of cost burden overall, during the same period the City of Mill Creek grew by 1390 households according to HUD-CHAS data. While this is good for some households, the distribution of incomes within the housing cost burden is shifting. In the 2005-2009 HUD-CHAS data, Very Low-to-Extremely Low incomes made up about 35 percent of all cost burden households, but in the 2015-2019 HUD-CHAS data they made up about 54 percent of all cost burden households, this is a shift of about 20 percent of the share of cost burden to lower income households.

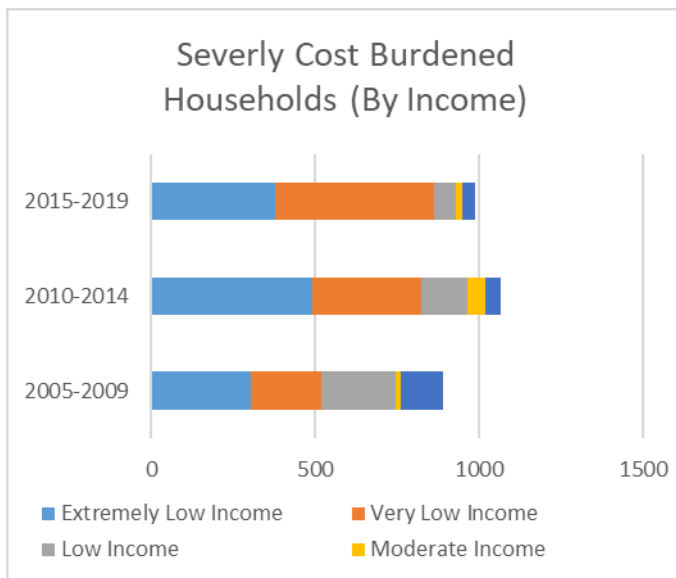


Figure 28. Severly Cost Burdened Households (By Income)  
Source: HUD-CHAS Data (Table 8)

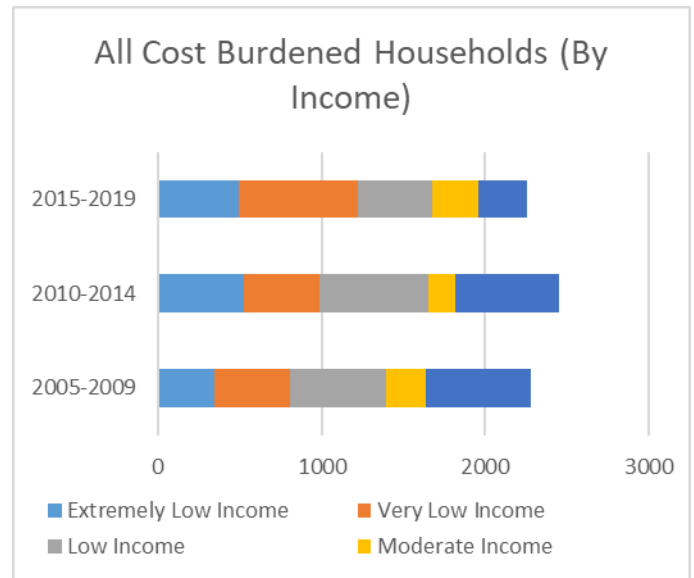


Figure 27. All Cost Burdened Households (By Income)  
Source: HUD-CHAS Data (Table 8)

Further analysis within cost burdened households reveals the distribution of household incomes that are severely cost burdened has more substantially changed, see Figure 27. In the 2005-2009 HUD-CHAS data, Very Low-to-Extremely Low incomes made up about 58 percent of all severely cost burden households, but in the 2015-2019 HUD-CHAS data they made up about 87 percent of all severely cost burden households. While other income brackets were experiencing dramatically decreased levels of severe cost burden, these two lowest incomes brackets were becoming disproportionately cost burdened.

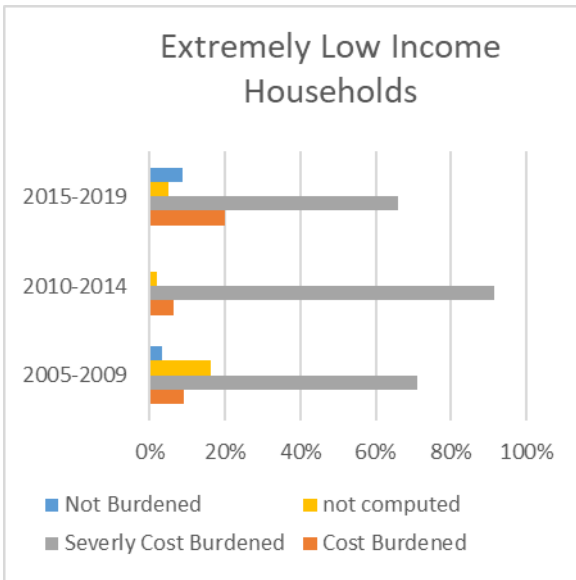


Figure 30. Percent Cost Burdened Extremely Low Income Households  
Source: HUD-CHAS Data (Table 8)

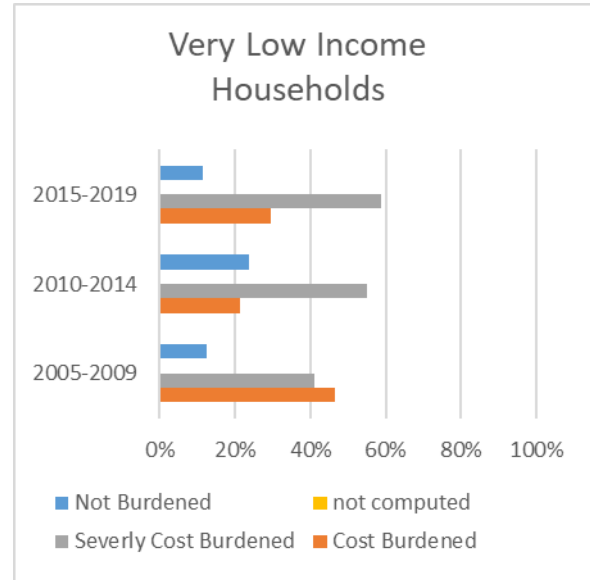


Figure 29. Percent Cost Burdened Very Low Income Households  
Source: HUD-CHAS Data (Table 8)

Very Low-to-Extremely Low incomes stand out as a group of households who are especially affected by cost burden in Mill Creek. Figure 30 and Figure 29 show the breakdown of cost burden levels within said income brackets. In both of these income brackets, the majority of households experience very high rates of housing cost burden and make up the majority of all cost burdened households in Mill Creek. Within Very Low-to-Extremely Low incomes there were 1225 cost burdened households reported in the 2015-2019 HUD-CHAS data. Note that the majority of households in Very Low-to-Extremely Low income segments are renters which are more vulnerable to displacement pressures, see Figure 31. There is strong evidence that households in the Very Low-to-Extremely Low income segments are experiencing significant economic displacement pressure.

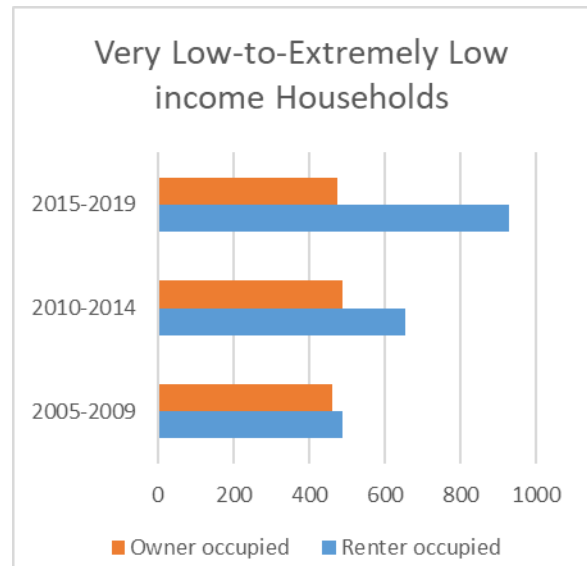


Figure 31. Tenure of Very Low-to-Extremely Low income Households  
Source: HUD-CHAS Data (Table 8)

**Housing Cost Burden Findings**

- The rate of overall housing cost burden has decreased slightly.
- The rate of housing cost burden for owner-occupied households has decreased significantly.
- The rate of housing cost burden for renter-occupied households has mostly stayed the same overall but with increased rates of severe cost burden.
- There is strong evidence that households in the Very Low-to-Extremely Low income segments are experiencing significant economic displacement pressure.

**c) Affordability of Rental Housing**

HUD provides data on the household income within affordable housing units. HUD provides data on households rent expenses that shows both household income in HUD income brackets, and the minimum income bracket level that their rent is “affordable” to; affordable in this sense means housing expenses not resulting in cost burden. Even if units are priced to be affordable to lower- or higher-income brackets, some households will be found living in housing that either is greater than their affordability limit (cost burdened) or less than their affordability limit. Figure 32 shows the language that will be used to refer to the RHUD levels throughout this analysis.

HUD uses RHUD affordability measures for rental unit affordability; RHUD indicates the cost of rent in reference to the level of income that it would be affordable to, so a low income household living in a RHUD moderate income unit would likely be housing cost burden (other factors effect actual cost burden).

RHUD level	Corelate HAMFI
Extremely Low Income Affordable	Extremely Low Income
Very Low Income Affordable	Very Low Income
Low Income Affordable	Low Income
Greater than Low Income Affordable	Greater than Low Incomes

*Figure 32. RHUD Affordability explanation  
Source: HUD-CHAS Data dictionary*

As identified previously in this report, households in the Very Low-to-Extremely Low income segments are of particular concern in Mill Creek; the following analysis will review these income segments both from the perspective of the households and the perspective of the housing which is affordable to them.

**How this indicator relates to displacement**

This indicator relates to indirect/economic displacement. The insufficient supply of rental units that are both affordable and available to low-income households forces many households to rent units that are not affordable to them. The associated financial pressure can ultimately force these households out of Mill Creek. This indicator also signals a risk of exclusionary neighborhood change, as shortages in affordable and available units make it difficult for low-income households to move to the city.

Analysis

Figure 33 shows the change in tenure of Mill Creek Households between 2015 and 2021. In recent years, the amount renter-occupied housing in Mill Creek has been steadily increasing with the addition of 622 occupied units between 2015 and 2021, an increase of about 21 percent. Owner-occupied housing has changed very little, in the same period 147 occupied units were added, only a 3 percent increase. The recent increase in the number of rental units is also reflected in the HUD-CHAS data, where the total number of occupied rental units grew by approximately 775 units, or 31 percent, between 2005 and 2019.

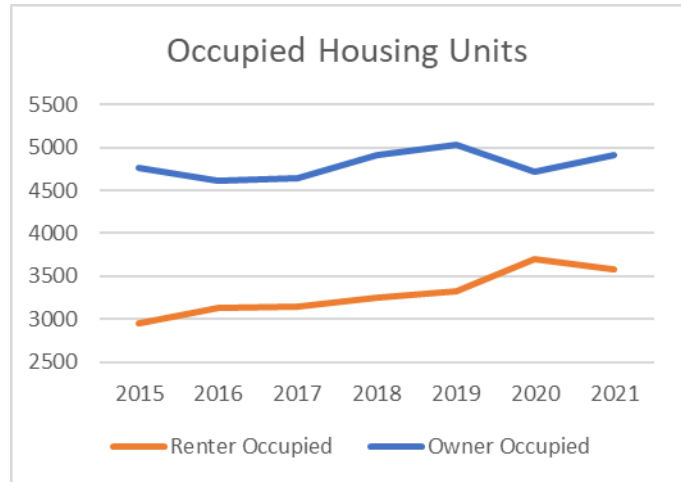


Figure 33. Occupied Housing Units (By Tenure)  
Source: U.S. Census Bureau; American Community Survey 5-Year Estimates, Table DP04

While the number of rental units in Mill Creek has grown, this growth has not been evenly distributed when analyzed by level of affordability. Figure 34 shows the number of occupied rental housing units in each income brackets level of affordability. The number of rental units grew in every category of affordability except for units affordable to households with low incomes. In the 2005-2009 CHAS data, the majority of rental units were affordable to households with low incomes; in the 2015-2019 CHAS data, the majority of rental units were only affordable to households with moderate and greater than HAMFI incomes. Note rental units affordable to extremely low income households also grew over the period of analysis from 65 to 135 units, a little more than doubled within its category but overall less than 2 percent of all rental units.

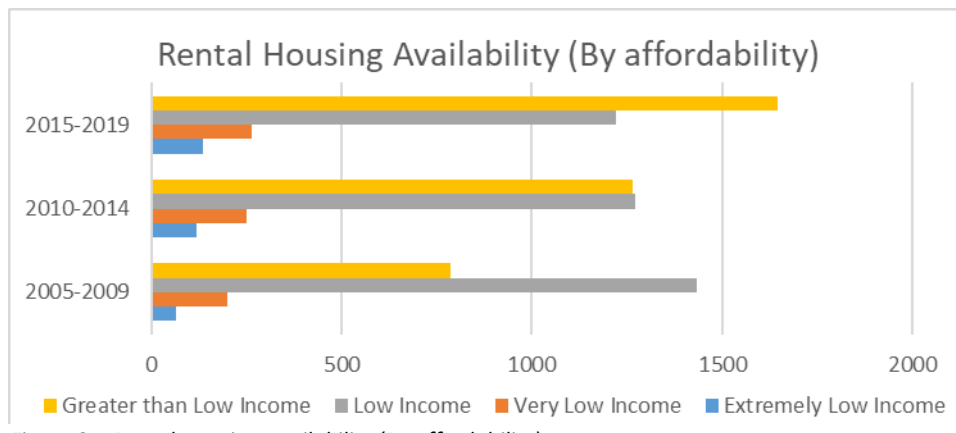


Figure 34. Rental Housing Availability (By affordability)  
Source: HUD-CHAS Data (Table 15C)

The 2015-2019 CHAS data showed there were 364 rental units affordable to extremely low income households (Figure 35) and 510 rental units affordable to very low income households (Figure 36). In both income segments, the majority of households were renting units that were only affordable to higher income segments, creating an income-to-rent mismatch. Some of this income-to-rent mismatch can be attributed to other factors, but this is generally an indicator of a lack of affordable housing availability in the community.

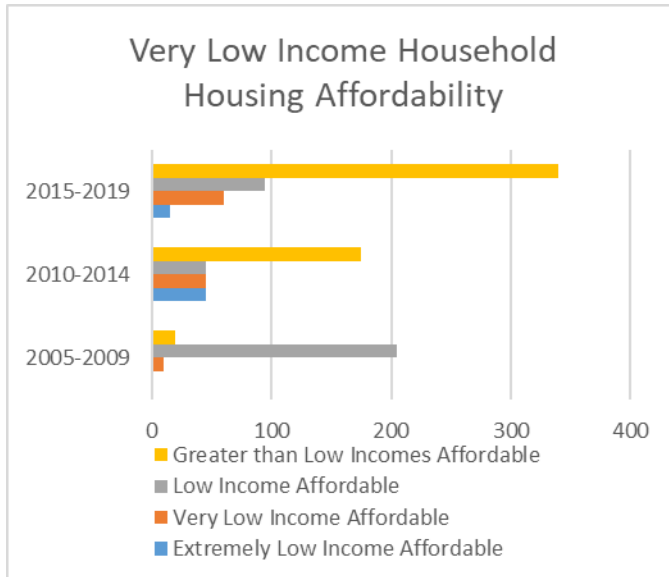


Figure 36. Very Low Income Household Housing Affordability  
Source: HUD-CHAS Data (Table 15c)

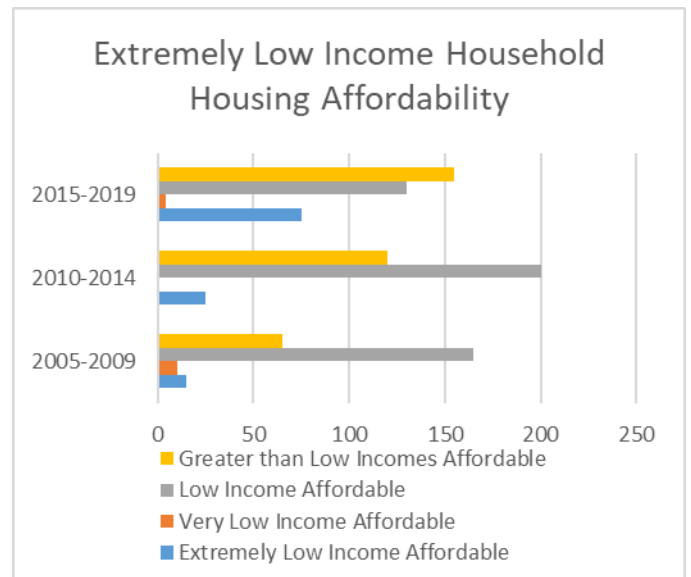


Figure 35. Extremely Low Income Household Housing Affordability  
Source: HUD-CHAS Data (Table 15c)

Over the period of analysis, the distribution of housing affordability among extremely low income households shifted. In the 2005-2009 CHAS data, 64 percent of extremely low income households were renting at low income affordable levels and 25 percent were renting at a greater than low income affordable level. In the 2015-2019 CHAS data the share of households renting at these RHUD levels had changed; 20 percent of households were renting at extremely low income affordable levels, 35 percent were renting at low income affordable levels, and 24 percent were renting at a greater than low income affordable level. This represents a decrease in the utilization of low income affordable housing units by extremely low income households and an increase in the utilization of the other two levels. For extremely low income households, the relatively high utilization of greater than low income housing suggests excessive housing cost burden due to lack of affordable housing. This places a majority of households in this income segment at an increased risk of economic displacement.



Households with very low incomes experienced a similar shift in the distribution of housing affordability. In the 2005-2009 CHAS data, 87 percent of very low income households were renting at low income affordable levels and 9 percent were renting at greater than low income affordable levels. In the 2015-2019 CHAS data, only 19 percent of very low income households were renting at low income affordable levels, while 67 percent were renting at greater than low income affordable levels, the remainder of the households were renting at lower income levels, as shown in Figure 37. This was a dramatic shift in distribution; over the period of analysis an additional 320 very low income households started renting at greater than low income affordable levels, making up more than half of all renters in this income segment.

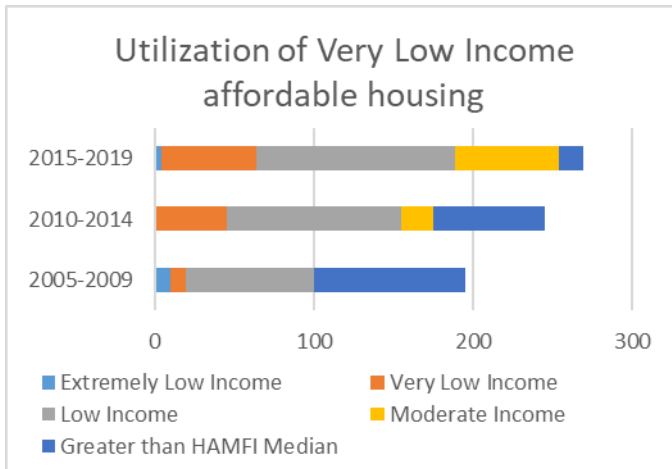


Figure 37. Utilization of Very Low Income affordable housing  
Source: HUD-CHAS Data (Table 15c)

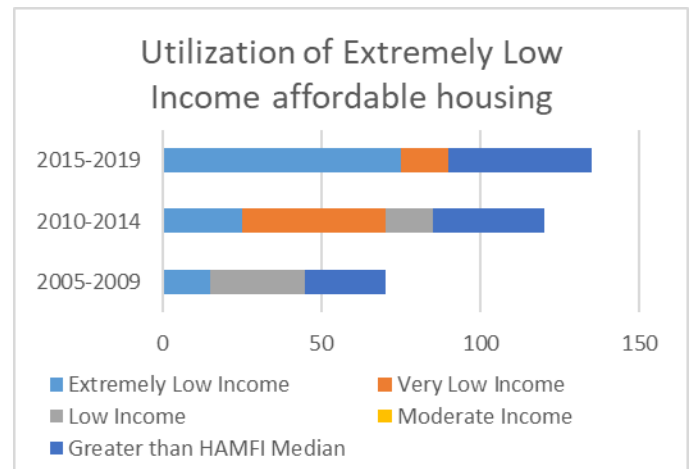


Figure 38. Utilization of Extremely Low Income affordable housing  
Source: HUD-CHAS Data (Table 15c)

Using the same HUD RHUD measures, we can determine what income segments are utilizing the available housing that is affordable to these lower income segments. For rental units affordable to extremely low household income, utilization by extremely low income households has increased over the period of analysis, as shown in Figure 38. For rental units affordable to very low household incomes, a growing portion of the households utilizing these units are very low income households, but the majority are low income households. These low income households are “renting down” which is an indicator that there may be a lack of housing affordable to their income and they are forced to utilize the available rental housing in their price range. These low income households are not at particular risk

### Rental Housing Affordability Findings

- Rental housing supply in Mill Creek is increasing but is not linear with affordability.
- For extremely low-income (less than 30% of HAMFI) and very low-income (30-50% of HAMFI) households, their high utilization of greater than low-income housing units suggests excessive cost burden due to a lack of affordable housing, placing them at an increased risk of economic displacement.
- Low-income households (50-80% of HAMFI) are “renting down” indicating there may be a lack of affordable housing at their income level and they are forced to utilize the available rental housing in their price range.
- These households do not face a particular risk of displacement, but they reduce the availability of these rental units for households that these units are considered affordable housing for.

of displacement, but they reduce the availability of these rental units to households that are in the income segments that they are considered affordable for.

***Report Objective 4: Evaluate displacement risk of individuals from racial and ethnic communities which have been subject to discriminatory housing policies in the past.***

As part of the racial equity and anti-displacement report, the City of Mill Creek identified the displacement risk of communities of individuals which have been subject to discriminatory housing policies in the past. This will focus on individuals from racial and ethnic communities. Some displacement risk indicators that were utilized in this analysis were:

- a) Rentership
- b) Educational Attainment

## **Rentership**

One of the ways displacement risk can be measured is percentage of renter households occupied by BIPOC (Black, Indigenous, and People of Color) over the percentage of non-BIPOC. Using CHAS data based on 2015-2019 ACS 5-year estimates we found that communities of individuals which have been subject to discriminatory housing policies in the past rent at a higher rate than white non-Hispanic people. This was true for non-Hispanic people of multiple races, Hispanic people of any race, non-Hispanic Black or African American people, and non-Hispanic Pacific Islander people.

Non-Hispanic Pacific Islander people rented at a higher rate than non-Hispanic white people by the largest margin. See Figure 39 below for a full summary of rentership vs ownership.

### Analysis

The overall percentage of renter-occupied and owner-occupied households in the City of Mill Creek is about 40 percent renters and 60 percent owners.

Figure 38 shows that from 2015 to 2019, 50 percent of non-Hispanic households identifying as multiple races, 64 percent of Hispanic households of any race, 67 percent of non-Hispanic Black or African American households, and 100 percent of non-Hispanic Pacific Islander households (65 total households) rent their units. These figures are above the average rate of renter households in the City of Mill Creek, meaning there is a higher risk of displacement for these communities.

According to US Census Bureau, there are currently 2235 households that identify as Black, Asian, Pacific Islander, American Indian or Alaska Native, other (including multiple races, non-Hispanic), and/or Hispanic in the city. 980 of these households are renter-occupied, about 12 percent of the total households.

For non-Hispanic Asian and American Indian or Alaska Native households, rentership in Mill Creek is 31 percent and 38 percent, respectively. These figures are below the average rate of renter households in the city.

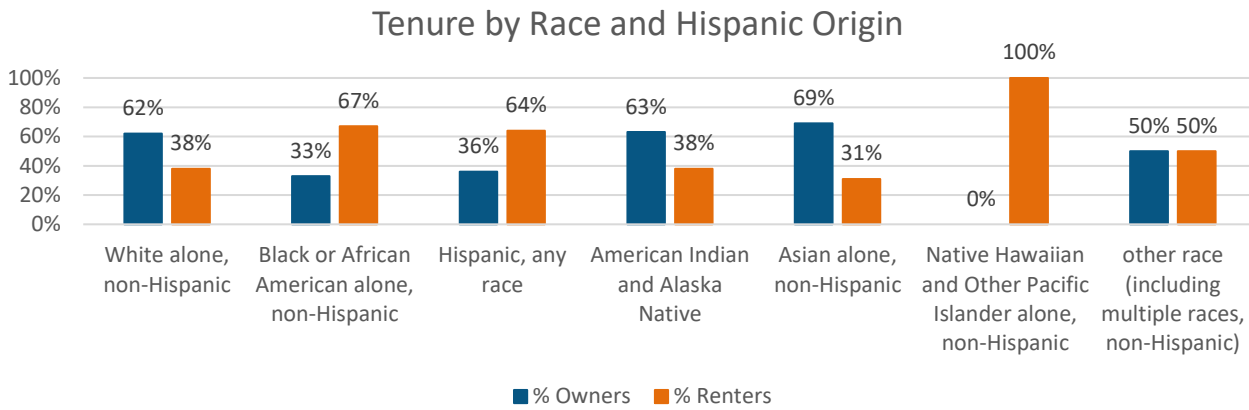


Figure 39. Tenure by Race and Hispanic Origin

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates Table S2502

## Educational Attainment

Another method of measuring displacement risk is by looking at the number of college bachelor’s degrees under city average for individuals which have been subject to discriminatory housing policies in the past. A lower percentage of college degrees for individuals of a community can mean that they are more likely to be priced out of their homes, neighborhoods, and even the city. This is because in the region and city, individuals with a college degree (bachelors+) make higher incomes on average than those without a college degree (see Figure 40 and 41 below).

### Analysis

The City of Mill Creek has a population of 14,417 over the age of 25 and 49.9 percent (7,200) have educational attainment of a bachelor’s degree or higher.

This analysis found that 24.8 percent of Black, 16.7 percent of American Indian or Alaska Native<sup>5</sup>, 16.2 percent of other race alone, and 32.1 percent of Hispanic or Latino origin people over the age of 25 in Mill Creek have a bachelor’s degree or higher in the City. With these data points being below average for Mill Creek, they signify that individuals in these communities may be more likely to be priced out of their homes than others and thus at a higher risk of displacement.

<sup>5</sup> When analyzing the educational attainment for American Indian or Alaska Native alone individuals over 25, this data needs to be approached with the additional understanding surrounding the generational trauma and extreme mistrust of educational systems caused by the Indian boarding school system.

### Educational Attainment for People 25 and Older (Individuals with bachelor's degrees)

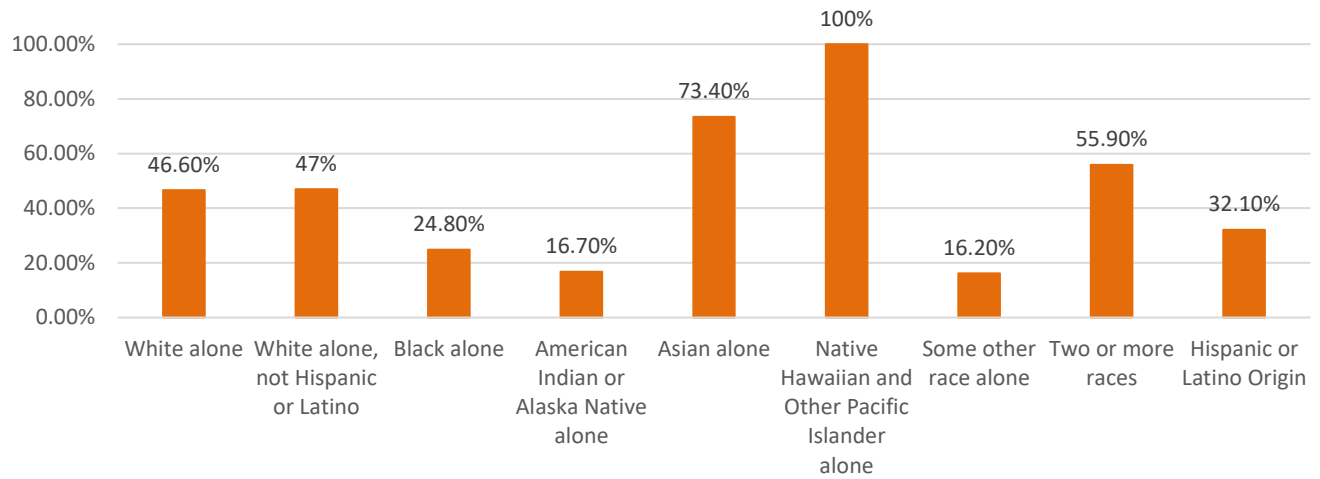


Figure 40. Educational Attainment for People 25 and Older (By race and ethnicity)  
Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates Table S2502

See Table 41 below for total educational attainment counts.

Age 25+ Origin by Educational Attainment	Total Population	Not high school graduate	High school graduate or higher	Bachelor's degree or higher	Percent bachelor's over total
White alone	10,089	359	9,730	4,700	46.6%
White alone, not Hispanic or Latino	9,693	352	9,341	4,558	47%
Black alone	657	0	657	163	24.8%
American Indian or Alaska Native alone	48	0	48	8 <sup>6</sup>	16.7%
Asian alone	2,439	82	2,357	1,791	73.4%
Native Hawaiian and Other Pacific Islander alone	102	0	102	102	100%
Some other race alone	426	0	426	69	16.2%
Two or more races	656	0	656	367	55.9%
Hispanic or Latino Origin	959	7	952	308	32.1%
<b>City Totals (25+)</b>	<b>14,417</b>	<b>441</b>	<b>13,976</b>	<b>7,200</b>	<b>49.9%</b>

Figure 41. Educational Attainment for People 25 and Older (By race and ethnicity)  
Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates Table

<sup>6</sup> When analyzing the educational attainment for American Indian or Alaska Native alone individuals over 25, this data needs to be approached with the additional understanding surrounding the generational trauma and extreme mistrust of educational systems caused by the Indian boarding school system.

**Displacement Risk Findings for Racial and Ethnic Communities**

- Non-Hispanic people of multiple races, Hispanic people of any race, non-Hispanic Black or African American people, and non-Hispanic Pacific Islander people (communities that have been subject to discriminatory housing policies in the past) rented at higher rates than average. This in conjunction with the other factors analyzed in this report leads to a higher risk of displacement for these communities.
- Data shows that non-Hispanic Black or African American, American Indian or Alaska Native, some other race alone, and Hispanic or Latino origin residents of Mill Creek may be at higher risk of displacement based on their educational attainment.
- When looking at these indicators combined, Hispanic people of any race and non-Hispanic Black or African American residents in Mill Creek have an increased risk due to both lower than average educational attainment and higher than average rentership.

## **IX. Report Conclusions**

The Growth Management Act (GMA) Housing Element requirements have changed substantially since the last time the City of Mill Creek Comprehensive Plan was updated in 2015. The Racial Equity and Displacement Analysis Report provides a strong set of information and policy recommendations which can be utilized as the city completes its comprehensive plan update. Many of the policy areas the city will want to focus on should link to actions the city is prepared to take. As an example, policies to encourage more middle housing may be coupled with development regulation or zoning map changes.

Following this report, a set of middle housing strategies and actions will be developed. As part of that process, potential code and map changes the city could consider will be matched with policy recommendation. This should provide a great foundation as the city plans for additional housing and people.



# Mill Creek Comprehensive Plan

## Racially Disparate Impacts Background Analysis

PREPARED FOR








DECEMBER 2024

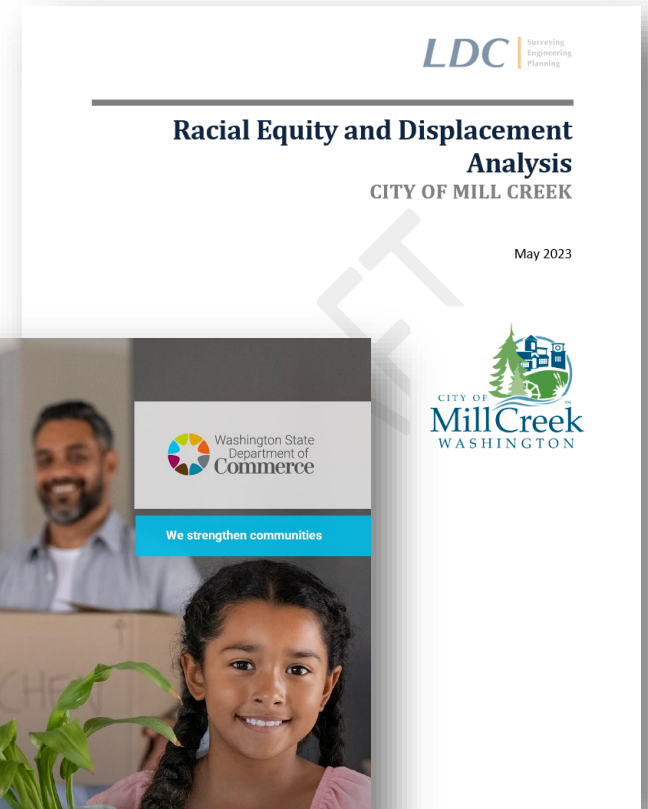
PREPARED BY



# COMMERCE GUIDANCE & PREVIOUS WORK

				
<b>Step 1 and throughout</b> Engage the Community	<b>Step 2</b> Gather and Analyze Data	<b>Step 3</b> Evaluate Policies	<b>Step 4</b> Revise Policies	<b>Step 5</b> Review and Update Regulations
Ongoing – further engagement activities planned for Spring 2024	Otak Community Profile  LDC Racial Equity and Displacement Analysis Report  Commerce toolkit and further HUD and PSRC data in this report	Extensive review of existing Comp Plan goals and policies in LDC report, to be integrated in forthcoming Otak/LCG goal and policy review	Spring/ Summer 2024, tied in with overall goal and policy updates to housing and economic development elements	Implementation of Comp Plan after adoption

Source: Department of Commerce, *Guidance to Address Racially Disparate Impacts* (2023)



# DATA ANALYSIS

## Step 2: Gather and Analyze Data



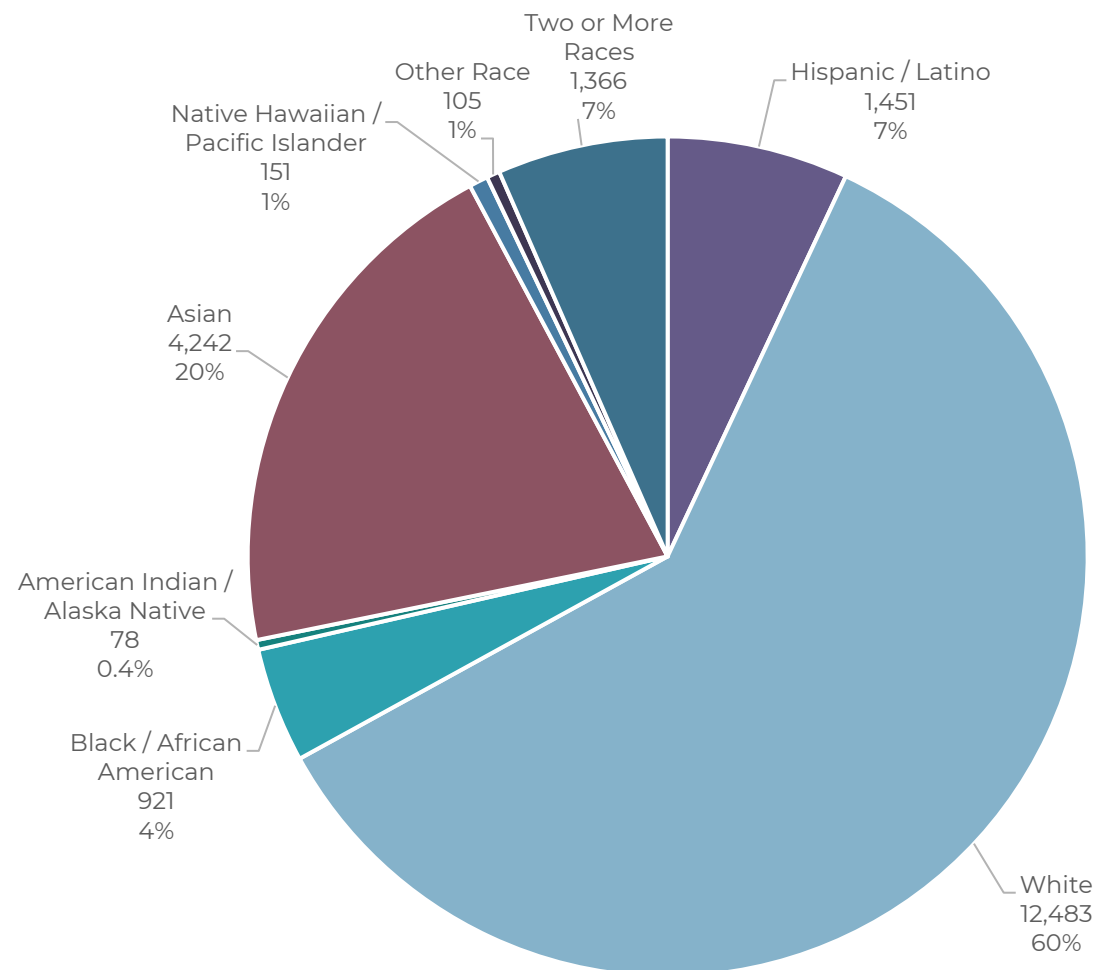
- RCW 36.70A.070(2) requires analysis of:
  - **Racially Disparate Impacts**, including considerations of:
    - Homeownership rates by race / ethnicity
    - Housing cost by race / ethnicity
    - Cost burden by race / ethnicity
    - Fair housing testing
    - Opportunity mapping
    - Disparities in educational access
  - **Exclusion in Housing**
    - Concentrations of racial groups and affordable housing
    - Comparison of residential population and workforce
  - **Displacement and Future Displacement Risk**
- Background data on these topics and data points is contained in this report and will be incorporated into the housing goal and policy review in the next stage of the planning process.



# RACE AND ETHNICITY

- Mill Creek is a predominantly White community, with **60%** of residents identifying as non-Hispanic White.
- About **7%** of Mill Creek residents have a **Hispanic or Latino** ethnicity, somewhat less than Snohomish County averages. However the share of Hispanic/Latino residents has **doubled since 2010**.
- Mill Creek has a **high share of Asian residents, at 20%**, nearly twice the countywide average. About 15% of Mill Creek residents report speaking an Asian language at home.
- The share of **Black** residents is similar to countywide averages, at around **4%**.
- Overall, the city has become **more diverse** over the past decade, with the share of BIPOC (Black, Indigenous, and people of color) population rising from **29% of the population in 2010 to 40% in 2022**.

Race/Ethnicity in Mill Creek, 2022

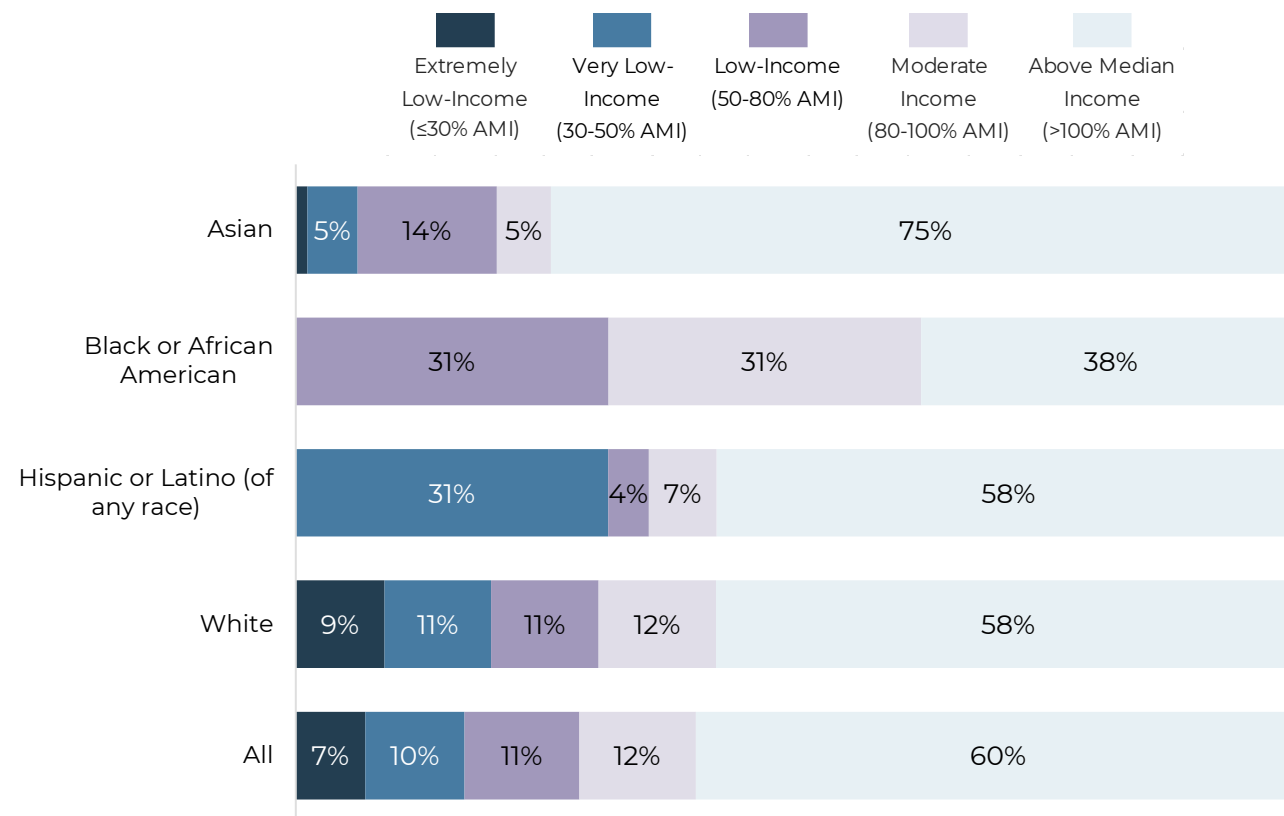


Source: 2022 American Community Survey 5-Year Estimates, Table DP05

# DISPARITIES IN INCOME

- Overall, **40% of Mill Creek households are earning under 100% of the Area Median Income (AMI)**, and 28% of households are considered low-, very low-, or extremely low-income, earning under 80% AMI.
- Mill Creek's **Hispanic and Latino** households have similar shares of high-income households as the White population, but fewer moderate-income households.
- Only about a third of Mill Creek's Black households earn over 100% AMI**, although there are few Black households earning extremely low incomes.
- Mill Creek's **Asian households are generally more affluent** than households of other races and ethnicities in the city.

Income by Race / Ethnicity in Mill Creek, 2019

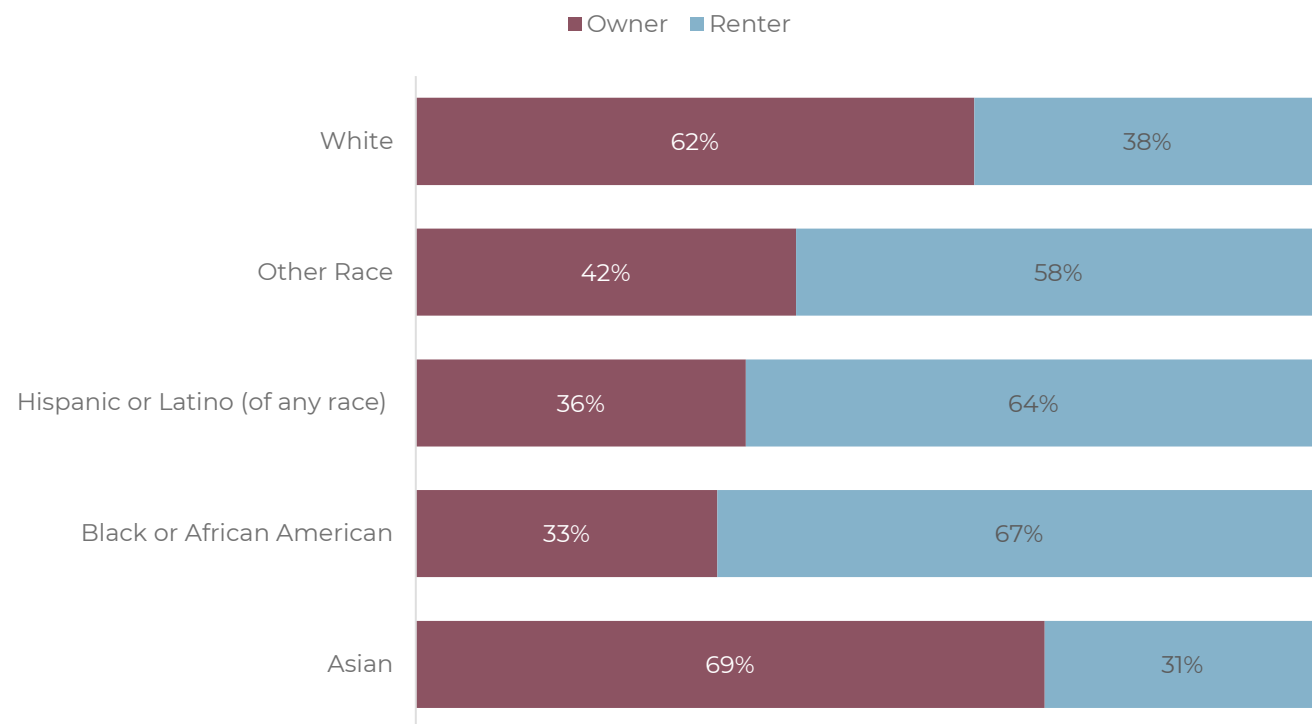


Source: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 1), WA Department of Commerce RDI Tool

# DISPARITIES IN HOMEOWNERSHIP

- The income levels shown previously are reflected in the **rates of homeownership** among Mill Creek households when broken down by race and ethnicity.
- **White** and **Asian** households in Mill Creek have higher incomes and show the **highest rates of homeownership** – above 60%.
- On the other hand, **over 60% of Black and Hispanic households in the city are renters.**
- These disparities in income and homeownership can reflect the effects of historical **exclusionary policies** such as redlining, which have prevented generational wealth-building by Black and other BIPOC households.

Mill Creek Households by Tenure and Race/Ethnicity, 2019

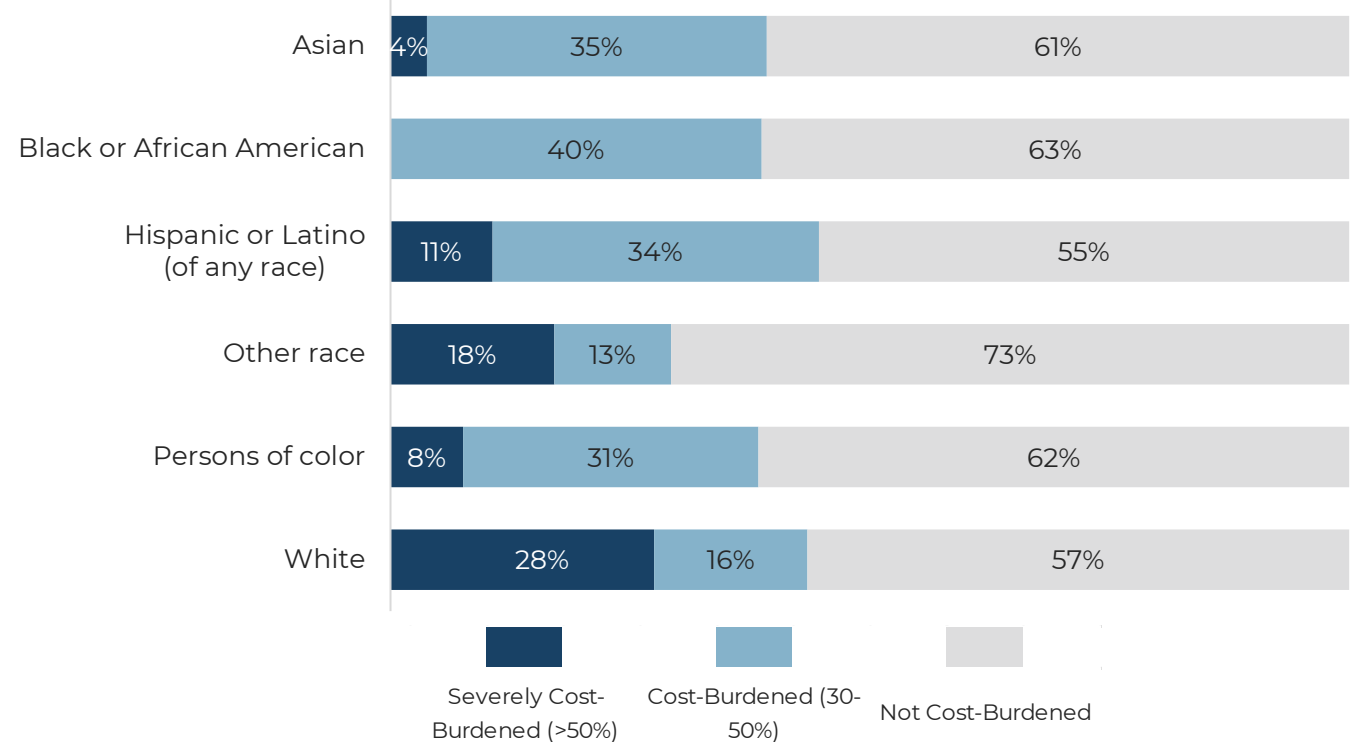


Source: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 9), WA Department of Commerce RDI Tool

# COST BURDEN

- In Mill Creek, **renters are more likely than homeowners to be cost-burdened**, defined as paying 30% or more of household income on housing costs, or severely cost-burdened, defined as paying 50% of household income or more on housing costs.
- When broken down by race and ethnicity, there are **not significant disparities in rates of overall renter cost-burden**.
- White renters are more likely to be severely cost-burdened, and Hispanic/Latino renters have a slightly higher rate of cost burden than other racial and ethnic groups.

**Renter Household Cost Burden by Race/Ethnicity in Mill Creek, 2019**



Source: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 9); Washington Department of Commerce, 2023

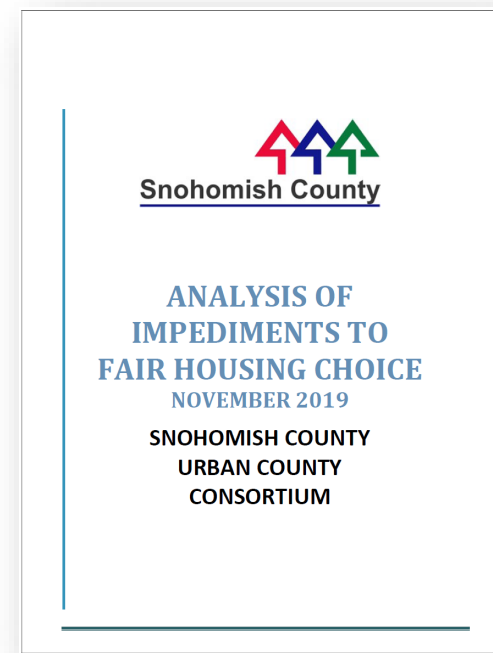
# FAIR HOUSING TESTING

- Snohomish County conducts periodic **fair housing audit testing** in which testers pose as prospective renters or purchasers to ensure compliance with fair housing laws. This testing “utilizes rigorous protocols to ensure that any discrepancies identified in the course of testing can be attributed to differential treatment,” as described in the County’s 2019 *Impediments to Fair Housing Choice* report.
- As shown in the table at right, **5 of 6 tests of rental properties in Mill Creek for bias due to race and sexual orientation found evidence of discrimination** in recent years.

**Mill Creek Fair Housing Test Results, 2016-17**

Zip Code	Protected Basis	Test Type	Test Date	Negative	Positive	Inconclusive	Total
98012	Race	Rental	2017	1	2		3
98012	Race	Rental	2016		2		2
98012	Sexual Orientation	Rental	2016		1		1
<b>Total</b>				<b>1</b>	<b>5</b>	<b>0</b>	<b>6</b>

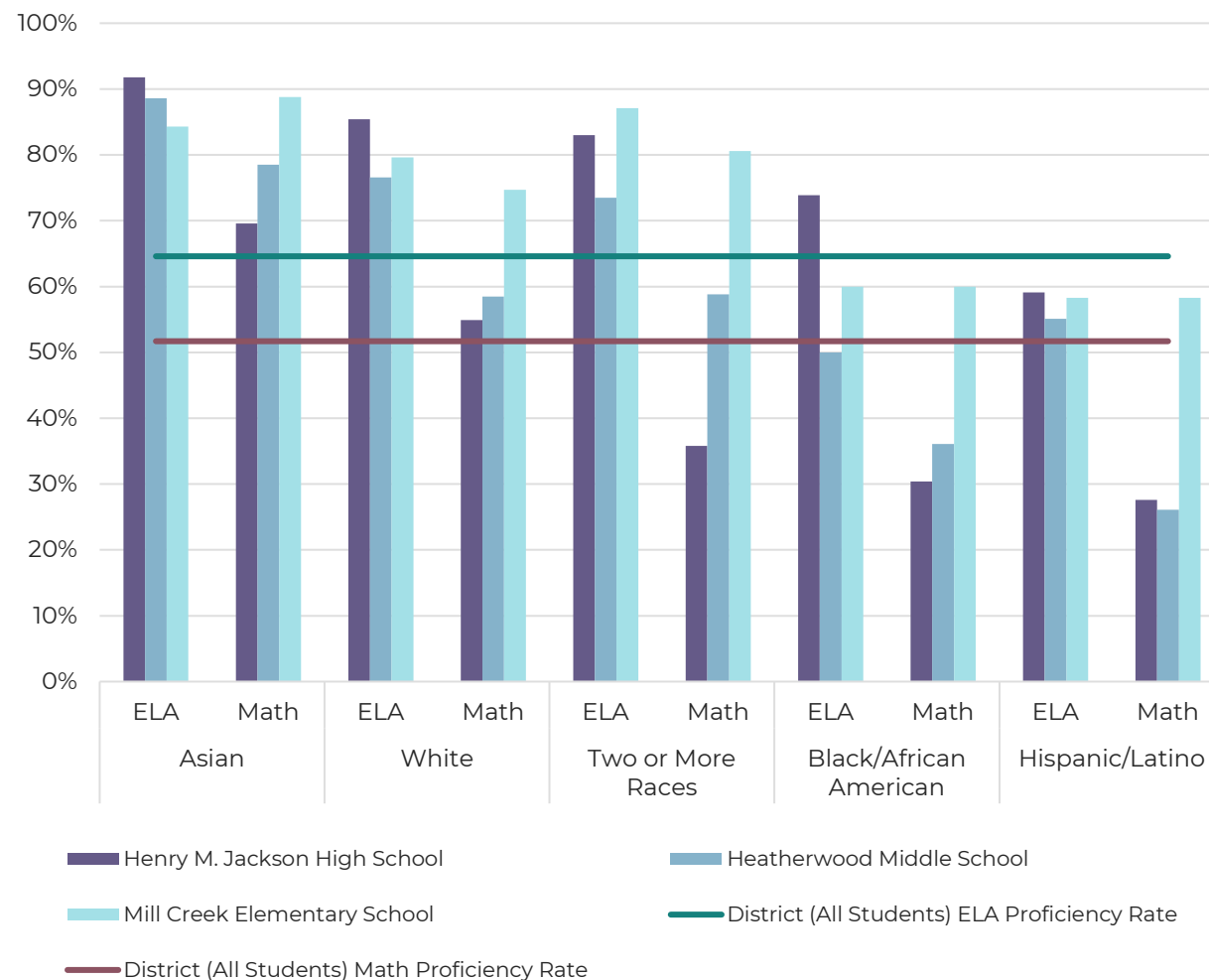
Source: Snohomish County Urban County Consortium, *Analysis of Impediments to Fair Housing Choice*, November 2019



# DISPARITIES IN EDUCATION

- The state’s report card of schools shows some **disparities in educational outcomes** by race and ethnicity in Mill Creek’s schools, as shown at right.
- **Mixed race, Black, and Hispanic/Latino** students are performing notably worse than their Asian and White counterparts in both language and math testing, but **particularly in math**.
- **Asian** students are performing the best of any racial/ethnic group in Mill Creek’s schools.
- These educational disparities **align with the income disparities by race and ethnicity** discussed earlier in this report.

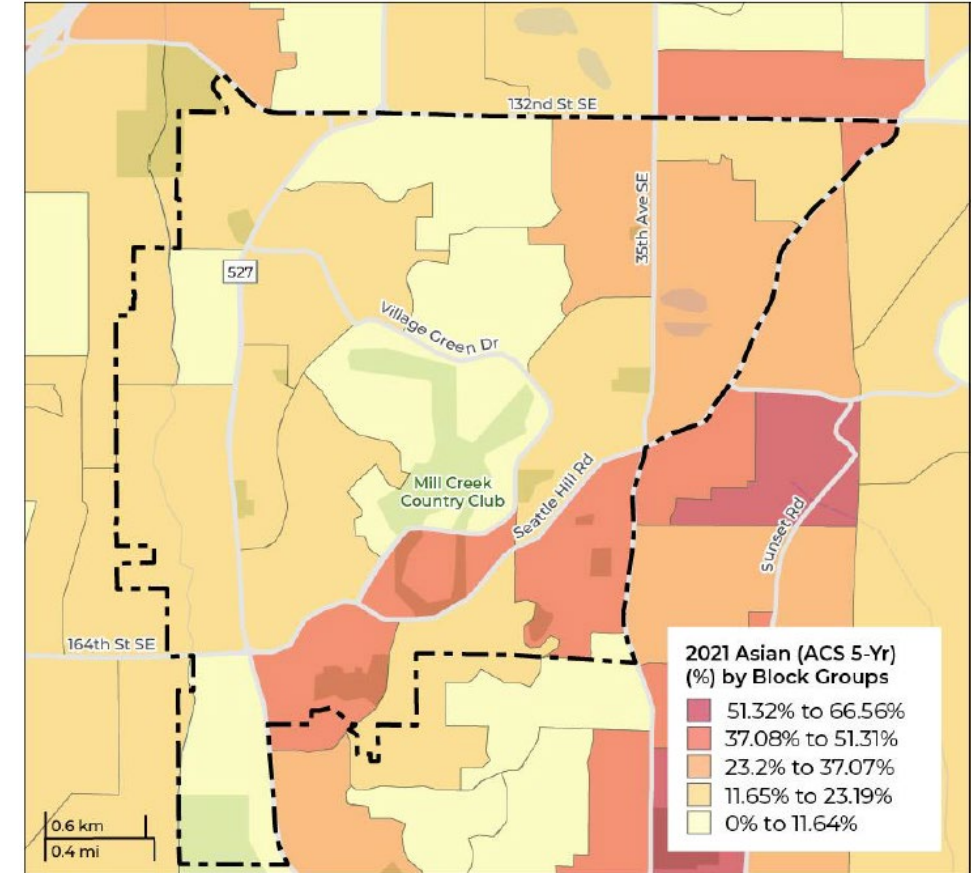
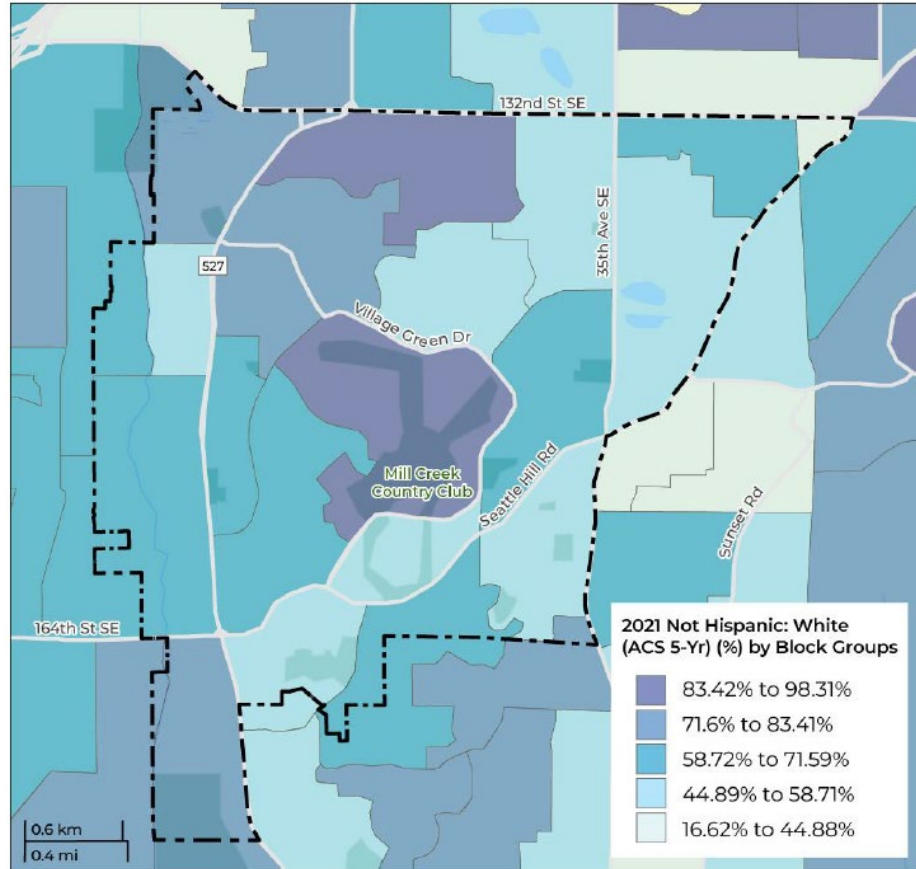
**Proficiency by Race in Mill Creek Schools, 2021-22**



Source: Washington Office of Superintendent of Public Instruction: Washington State Report Card

# GEOGRAPHIC DISPARITIES

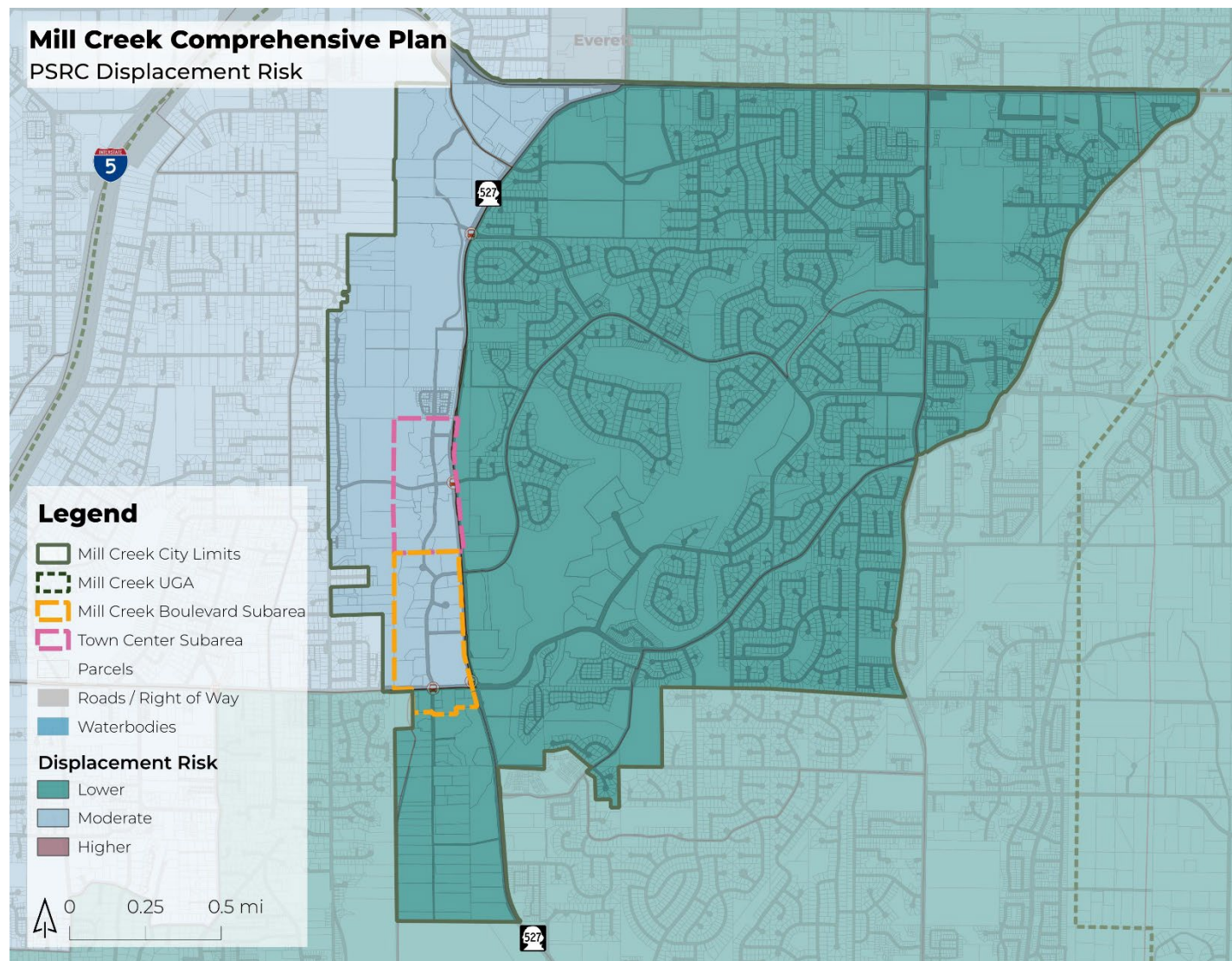
- These maps show the **geographic distribution** by race and ethnicity in Mill Creek. The central area of the city around the MCCC as well as the northwestern neighborhoods have a higher share of White residents.
- The city's **Asian** population is mostly housed in the **southern part of Mill Creek**, on either side of Seattle Hill Road.



Source: 2021 American Community Survey 5-Year Estimates, Otak Mill Creek 2024 Comprehensive Plan Community Profile

# DISPLACEMENT RISK

- PSRC has created a tool to identify neighborhoods in the four-county region that are at higher risk of displacement. Displacement can take multiple forms: **physical** (when buildings deteriorate or are taken off the market), **economic** (when costs rise), or **cultural** (when community networks and resources move away).
- As shown at right, most of Mill Creek's neighborhoods are classified as having a "**Lower**" displacement risk. The eastern part of the city and neighborhoods between the city limits and I-5 have a "**Moderate**" displacement risk.
- Strategies such as **tenant protections and targeted preservation of existing affordable units** can help prevent future displacement.

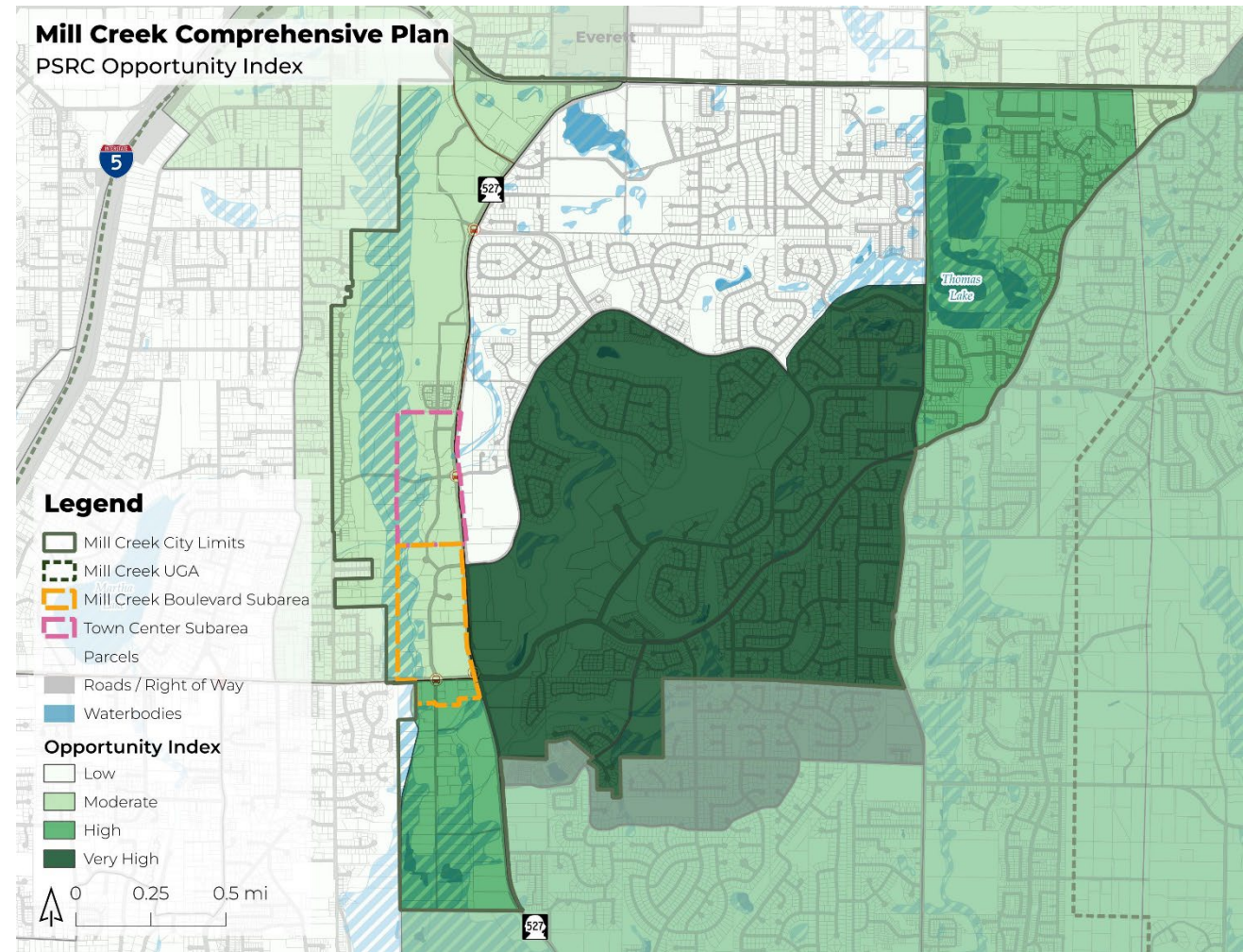


Source: PSRC Displacement Risk Map



# OPPORTUNITY MAPPING

- PSRC has also created an “Opportunity Map” which identifies **higher opportunity areas that are rich in resources which lead to positive life outcomes**. The five key metrics used in determining this index were:
  - Education
  - Economic health
  - Housing and neighborhood quality
  - Mobility and transportation
  - Health and environment
- Mill Creek’s neighborhoods have **varying scores** on this opportunity index. The MCCA and southern areas score very high, while the northern neighborhoods score low, as shown here.
- Areas that score **highly** on this index can be more competitive in receiving funding for tax credit-funded affordable housing developments. **Lower-scoring** areas can help target future investments in the areas shown above.



Source: PSRC Opportunity Map



# LELAND CONSULTING GROUP

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503.222.1600

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Strategic Advisors to Public and Private Development

# Mill Creek Comprehensive Plan

## Land Capacity Analysis Methodology and Results

### Background

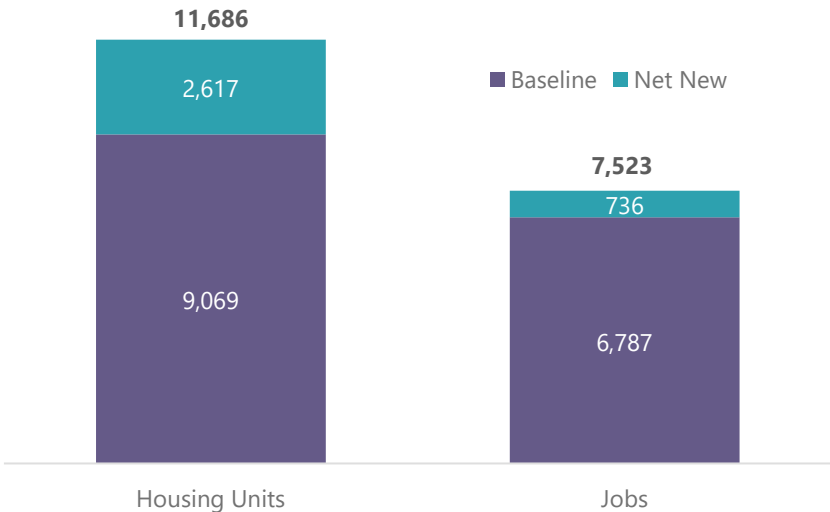
As part of Mill Creek’s 2044 Comprehensive Plan update, Leland Consulting Group (LCG) was retained as part of a consultant team led by Otak to complete an analysis of land capacity for housing and jobs, including considerations of housing by income band as required by RCW 36.70A.070(2)(c) and adequate provisions for meeting all housing needs as required by RCW 36.70A.070(2)(d). This memo outlines the methodology and results of this analysis, using the process outlined in the Washington Department of Commerce’s 2023 guidebook “Guidance for Updating Your Housing Element.”

### Land Capacity Analysis

#### Housing and Jobs Targets

Mill Creek is required to show **land capacity to meet 2020-2044 targets for housing units and jobs** based on the Washington Office of Financial Management countywide projections as allocated to jurisdictions through the Countywide Planning Policies. Figure 1 below shows Mill Creek baseline and target housing units and jobs through 2044.

Figure 1. Mill Creek Baseline and Target Housing Units and Jobs, 2019/20-2044



Source: Snohomish County Countywide Planning Policies (Effective March 6, 2022)

The housing unit baseline and targets are further broken down by what income band the housing units can serve, expressed as a percentage of the HUD Area Median Income (AMI). For reference, the current 2024 AMI for Snohomish County is **\$147,400**. The AMI is determined by the U.S. Department of Housing and Urban Development (HUD), and is generally higher than the Census-reported Median Household income for a given city, since it is a countywide metric and adjusted for household size. The HUD AMI is used to determine eligibility and income limits for subsidized affordable housing units.

The housing targets for families earning under 30 percent AMI are broken down into permanent units (i.e. standard housing units) and permanent supportive housing (PSH), defined in the Department of Commerce guidebook as “subsidized, leased housing for people who are experiencing homelessness or are at risk of homelessness and living with a disabling condition.” Finally, each jurisdiction receives a housing target for emergency housing, defined as “temporary accommodations for households who are experiencing homelessness or are at imminent risk of becoming homeless.” Mill Creek’s housing baseline and 2044 targets by income band are shown below:

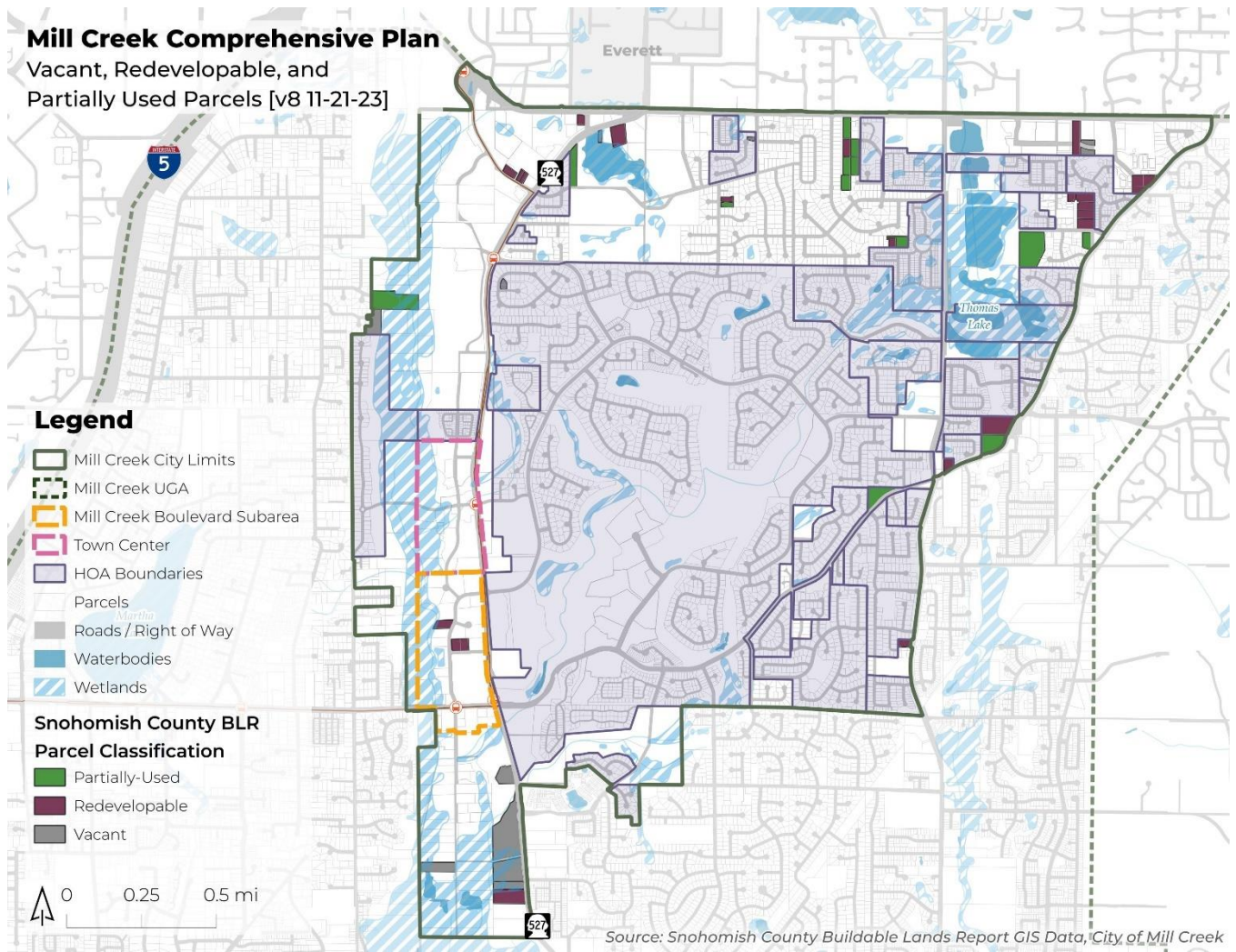
**Figure 2. Mill Creek Existing and Target Housing Units by Income Band, 2019-2044**



Source: Snohomish County 2023 Housing Characteristics and Needs Report (HO-5), Appendix G, p. 16 (p. 397 of combined HO-5 Appendices)

The first step in the land capacity analysis is to determine which parcels could accommodate new development over the 20-year planning horizon. Snohomish County provided GIS data from their Urban Growth Capacity Report classifying parcels in Mill Creek as **vacant, redevelopable** (based on low building to land value ratio and other considerations), **partially-used** (capable of being subdivided and developed more intensively), or **constant** (not likely to change over the next 20 years). Working with city staff, LCG refined the set of vacant and redevelopable parcels to account for planned and proposed development, some changes in land classification, and new development which has taken place since the County assessment. The revised set of vacant and redevelopable parcels is shown below in Figure 3.

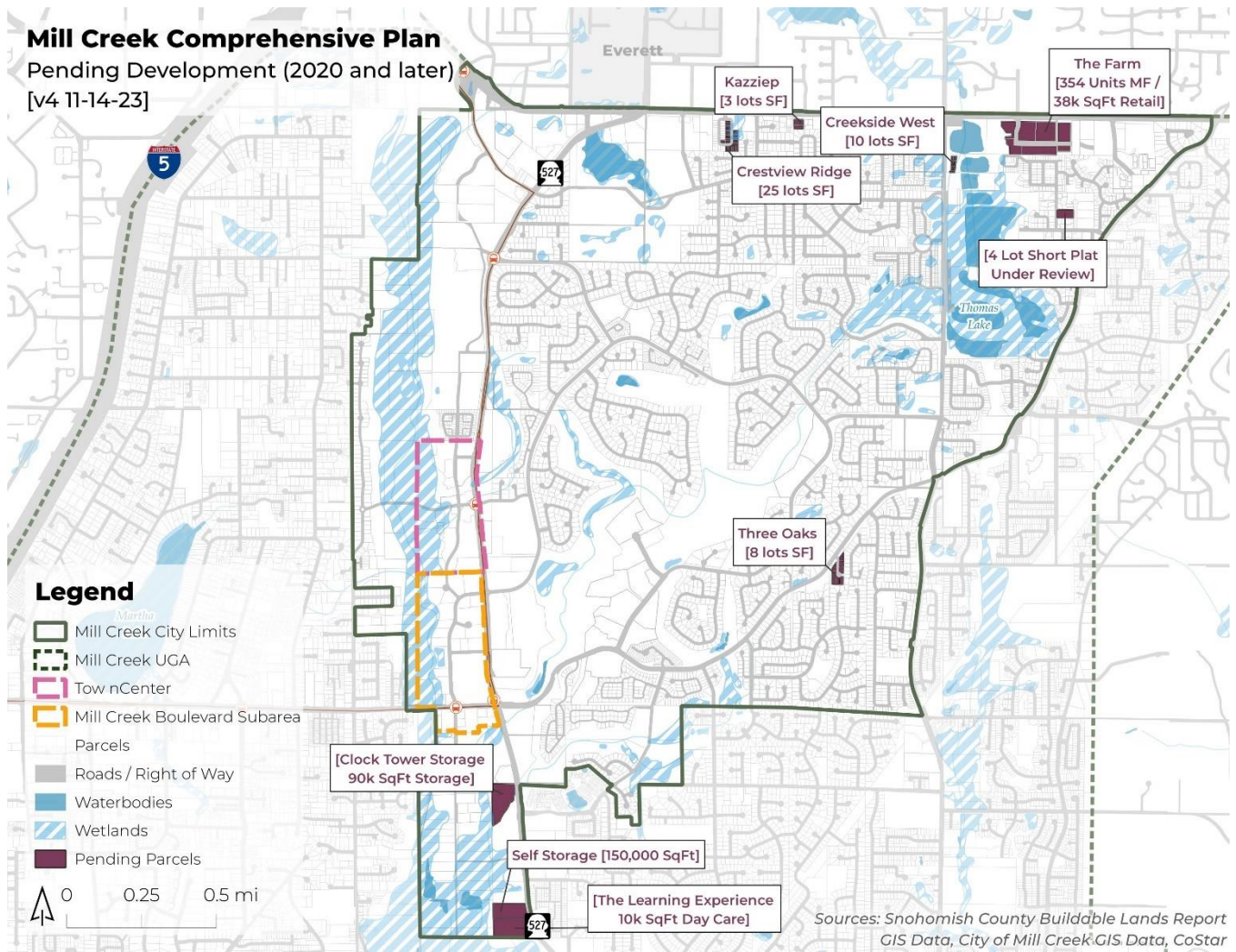
Figure 3. Vacant and Redevelopable Parcels in Mill Creek, 2023



Source: Snohomish County, City of Mill Creek, Leland Consulting Group

Next, development which has occurred since 2020 or is planned, proposed, or under construction was totaled. These new housing units and jobs **count towards the growth targets**, since the baseline established by Snohomish County was for 2020. The map below in Figure 4 shows the parcels with recent or forthcoming development on the city. This recent and forthcoming development totals **404 housing units and 123 jobs**.

Figure 4. Development Since 2020 and Planned Development in Mill Creek



Source: Snohomish County Buildable Lands Report GIS Data, City of Mill Creek GIS Data, CoStar, Leland Consulting Group

## Reduction Factor

Commerce’s HB 1220 guidance indicates that jurisdictions should reduce the amount of vacant and redevelopable acreage by a reasonable amount to account for land which may not be available for redevelopment due to the need for new **right-of-way, public space, stormwater facilities, or other dedications**, as well as a reasonable estimate of the amount of land that will remain unavailable due to the **market**. The Department of Commerce suggests a minimum reduction of 15% for vacant parcels and 25% for redevelopable and partially-used parcels. LCG used these recommended reduction factors applied to the Snohomish County GBACRES parcel acreage, which had already deducted critical areas from the net parcel acreage. The reduction factors and net acreage are shown below in Figure 5.

Figure 5. Market Factor and Net Vacant, Redevelopable and Partially-Used Acreage by Zone in Mill Creek

Zone	Total Buildable Acres	Vacant			Partially Used / Redevelopable			Total Net Acres
		Buildable Acres	Deduction Factor	Net Acres	Buildable Acres	Deduction Factor	Net Acres	
<b>Residential</b>								
PRD 7200	0.4	0.4	15%	0.4	0.0	25%	0.0	0.4
LDR	19.3	5.0	15%	4.2	14.3	25%	10.8	15.0
MDR	0.0	0.0	15%	0.0	0.0	25%	0.0	0.0
HDR	0.0	0.0	15%	0.0	0.0	25%	0.0	0.0
MU/HDR	0.0	0.0	15%	0.0	0.0	25%	0.0	0.0
<b>Commercial</b>								
CB	3.0	0.0	15%	0.0	3.0	25%	2.2	2.2
NB	0.8	0.0	15%	0.0	0.8	25%	0.6	0.6
PCB	0.0	0.0	15%	0.0	0.0	25%	0.0	0.0
EGUV	4.9	0.7	15%	0.6	4.2	25%	3.2	3.8
<b>Business / Industrial</b>								
BP	5.7	5.0	15%	4.2	0.8	25%	0.6	4.8
OP	1.9	0.0	15%	0.0	1.9	25%	1.5	1.5
<b>TOTAL</b>	<b>36.1</b>	<b>11.0</b>		<b>9.4</b>	<b>25.0</b>		<b>18.8</b>	<b>28.1</b>

Source: King County, City of Woodinville, CoStar, WA Department of Commerce, Leland Consulting Group

## Housing and Job Density Assumptions

Having established the amount of available developable acreage, the next step in the analysis is to estimate the density at which that acreage could redevelop. Following Commerce guidance, single-family zones are assumed to redevelop at the **maximum allowed density in the zoning code**. Note that additional capacity for middle housing and ADUs in low-density zones will be addressed at the parcel level later in this report. Housing unit density assumptions for multifamily zones are based on the **density of recent development** in that zone over the past five years and allowed housing typologies based on the zoning code. The density assumptions for housing are shown in Figure 6 below, for zones which allow housing.

Figure 6. Housing Density Assumptions for Mill Creek Land Capacity Analysis (units/acre)

Zone	Assumed Density (DU/Ac)
<b>Residential</b>	
PRD 7200	6
LDR	4
MDR	12
HDR	24
MU/HDR	30
<b>Commercial</b>	
CB	16
NB	30
PCB	24
EGUV	27
<b>Business / Industrial</b>	
BP	0
OP	0

Source: Mill Creek Zoning Code, CoStar, City of Mill Creek, Leland Consulting Group

For **employment density**, the square footage of rentable building area (RBA) per acre in recent development by zone was divided by the city’s square foot per job assumptions developed during the Buildable Lands process to produce a job density by acre figure for each zone. In mixed-use zones with the potential for residential over ground floor commercial, such as CBD and the GB rezone area, local and regional examples were studied to arrive at a reasonable estimate of jobs in the ground floor of mixed-use developments. The job density assumptions are shown below in Figure 7. These densities are then applied based on the expected share of residential, mixed-use, and commercial development in each zone.

**Figure 7. Job Density Assumptions for Mill Creek Land Capacity Analysis (jobs/acre)**

Zone	Jobs in Mixed-Use Buildings/Acre	Jobs in Commercial Buildings/Acre
<b>Residential</b>		
PRD 7200	20	0
LDR	20	0
MDR	20	0
HDR	20	0
MU/HDR	20	0
<b>Commercial</b>		
CB	20	0
NB	20	0
PCB	20	0
EGUV	20	0
<b>Business / Industrial</b>		
BP	20	25
OP (Outside Subarea)	20	25

Source: CoStar, City of Mill Creek, Leland Consulting Group

## Additional ADU Capacity

HB 1337, passed by the legislature in 2023, requires that cities allow two ADUs, detached or attached, on all parcels currently zoned for low-density residential (i.e. single-family). As part of this capacity analysis, LCG considered the additional housing capacity that this new legislation could create in Mill Creek. Parcels in the PRD and LDR zones were considered for this analysis. The built square footage was first removed from the parcel acreage, and then the remaining acreage within the allowed lot coverage ratio (per the zoning code) was calculated. Assuming at least 1,000 square feet would be required to construct an ADU, this resulted in a total of **729 parcels which have sufficient space for an ADU**. Based on Commerce guidance and regional trends, LCG assumed that 2 percent of homeowners might choose to develop an ADU over the planning horizon. This relatively low percentage was chosen due to the high number of Homeowner Associations in Mill Creek which may restrict ADU construction, although parcels within the HOAs were included in the analysis since neither staff nor consultants were able to verify the restrictions of every HOA in the city. This analysis resulted in an **ADU capacity of 15 units** which was included in the overall capacity result.

## Additional Duplex Capacity

HB 1110, also passed by the legislature in 2023, requires that Mill Creek allow duplexes on all lots in low-density residential zones. To determine the potential for added units, LCG conducted a high-level analysis of parcels outside of HOAs which may have restrictive covenants prohibiting the construction of more than one unit per lot. The capacity and likelihood of redevelopment into middle housing was based on parcels with a buildable area of greater than 2,000 square feet within allowed lot coverage, an improvement-to-land value ratio of under 1.0, and existing buildings of less than 1,500 square feet. This analysis resulted in 41 parcels which might be the most likely to be redeveloped as duplexes. Commerce suggests estimating a 25% uptake rate, which would result in 10 duplexes, or 20 units, over the planning horizon. These numbers were added to the overall housing capacity results as well.



## Initial Results

The initial results of Mill Creek’s land capacity for housing and jobs is shown below in Figure 8. As shown, the city has a deficit of capacity to meet both housing unit and job growth targets under current zoning.

**Figure 8. Mill Creek Initial Net New Land Capacity for Housing and Jobs, 2019/20-2044**



Source: City of Mill Creek, Snohomish County, Leland Consulting Group

In order to address this shortfall, LCG analyzed revised housing unit and job capacity within the Mill Creek Boulevard Subarea (shown at right). Proximate to the recently constructed Orange Line Swift BRT, which also connects to the forthcoming LINK Light Rail station in Lynnwood, this area which is currently zoned for relatively low-density commercial development was the subject of a subarea planning effort in 2022 which envisioned higher-density multifamily and mixed-use development in the area over the next 20 years. Throughout 2023 and 2024, the Mill Creek Planning Commission and City Council discussed and workshopped potential future scenarios for the subarea, and arrived at the decision to rezone the subarea to allow higher-density multifamily and mixed-use development as part of this 2024 Comprehensive Plan update.

**Figure 9. Mill Creek Boulevard Subarea**



## Revised Scenario and Results

In the revised land capacity analysis, the Mill Creek Boulevard Subarea was assumed to redevelop at a density of 100 units per acre and 20 jobs per acre, consistent with averages drawn from a study of 5-7 story podium mixed-use developments throughout the Puget Sound region. Since the economics of the land value of parcels in the subarea would be significantly affected by rezoning,

improvement-to-land value was not used to calculate propensity for redevelopment. Instead, an additional 10% market reduction factor was applied on top of the 25 percent used in the previous analysis. Additionally, a higher density assumption of employment uses was developed for the BP and OP zones of 50 jobs per acre (up from 20 jobs per acre). This was reflective of the city’s Economic Vitality element revisions and policy direction towards attracting potential office or medical uses to these zones in future decades. The higher job density was based on prototypes of medium-density health care and office development in Bellevue, Kirkland, and suburban northern California. The revised housing and job density numbers, acreage, and reduction factors are shown below.

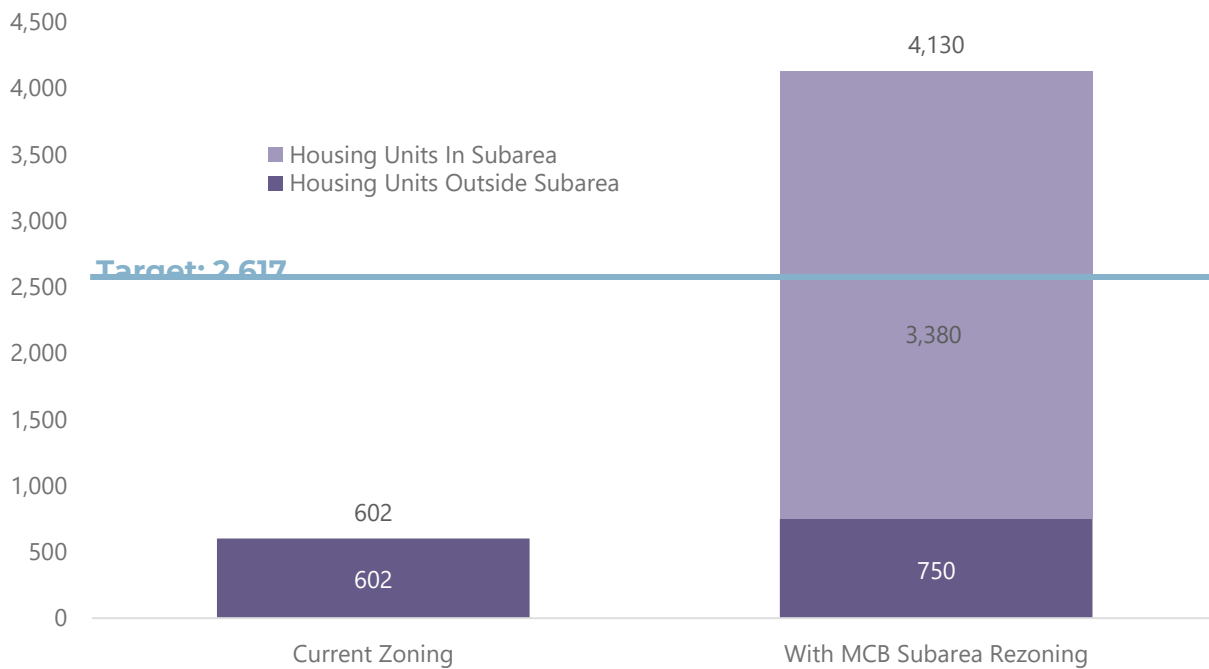
**Figure 10. Revised Acreage, Density Assumptions, and Reduction Factors in Mill Creek Land Capacity Analysis**

Zone	Total Buildable Acres	Vacant			Partially Used / Redevelopable			Total Net Acres	Housing Assumed Density	Jobs			
		Buildable Acres	Deduction Factor	Net Acres	Buildable Acres	Deduction Factor	Net Acres			Jobs in MU Buildings/Acre	% Ground Floor Commercial	Jobs in Commercial Buildings/Acre	
<b>Residential</b>													
PRD 7200	0.4	0.4	15%	0.4	0.0	25%	0.0	0.4	6	20	0%	0	
LDR	19.3	5.0	15%	4.2	14.3	25%	10.8	15.0	4	20	0%	0	
MDR	0.0	0.0	15%	0.0	0.0	25%	0.0	0.0	12	20	0%	0	
HDR	0.0	0.0	15%	0.0	0.0	25%	0.0	0.0	24	20	0%	0	
MU/HDR	0.0	0.0	15%	0.0	0.0	25%	0.0	0.0	30	20	0%	0	
<b>Commercial</b>													
CB	3.0	0.0	15%	0.0	3.0	25%	2.2	2.2	16	20	0%	0	
NB	0.8	0.0	15%	0.0	0.8	25%	0.6	0.6	30	20	100%	0	
PCB	0.0	0.0	15%	0.0	0.0	25%	0.0	0.0	24	20	50%	0	
EGUV	4.9	0.7	15%	0.6	4.2	25%	3.2	3.8	27	20	50%	0	
<b>Business / Industrial</b>													
BP	5.7	5.0	15%	4.2	0.8	25%	0.6	4.8	0	20	0%	50	
OP	0.0	0.0	15%	0.0	0.0	25%	0.0	0.0	0	20	0%	50	
<b>Mill Creek Boulevard</b>													
MCB	0.0	0.0	15%	0.0	0.0	35%	0.0	0.0	100	20	100%	0	

Source: City of Mill Creek, CoStar, Urban Footprint, Snohomish County, Leland Consulting Group

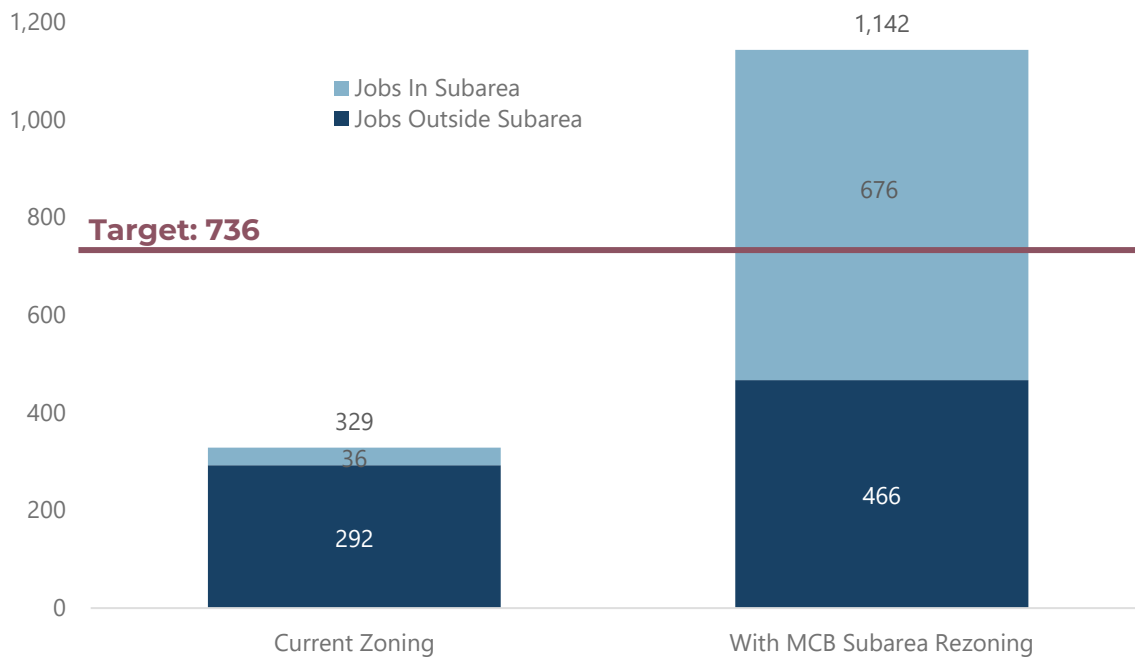
The revised total housing unit and jobs capacity, including the capacity of the rezoned Mill Creek Boulevard Subarea, are shown below. As shown, the city has sufficient capacity to exceed both housing and jobs targets after rezoning the Subarea.

**Figure 11. Net New Housing Unit Capacity in Mill Creek, 2020-2044**



Source: City of Mill Creek, CoStar, Urban Footprint, Snohomish County, Leland Consulting Group

Figure 12. Net New Jobs Capacity in Mill Creek, 2020-2044

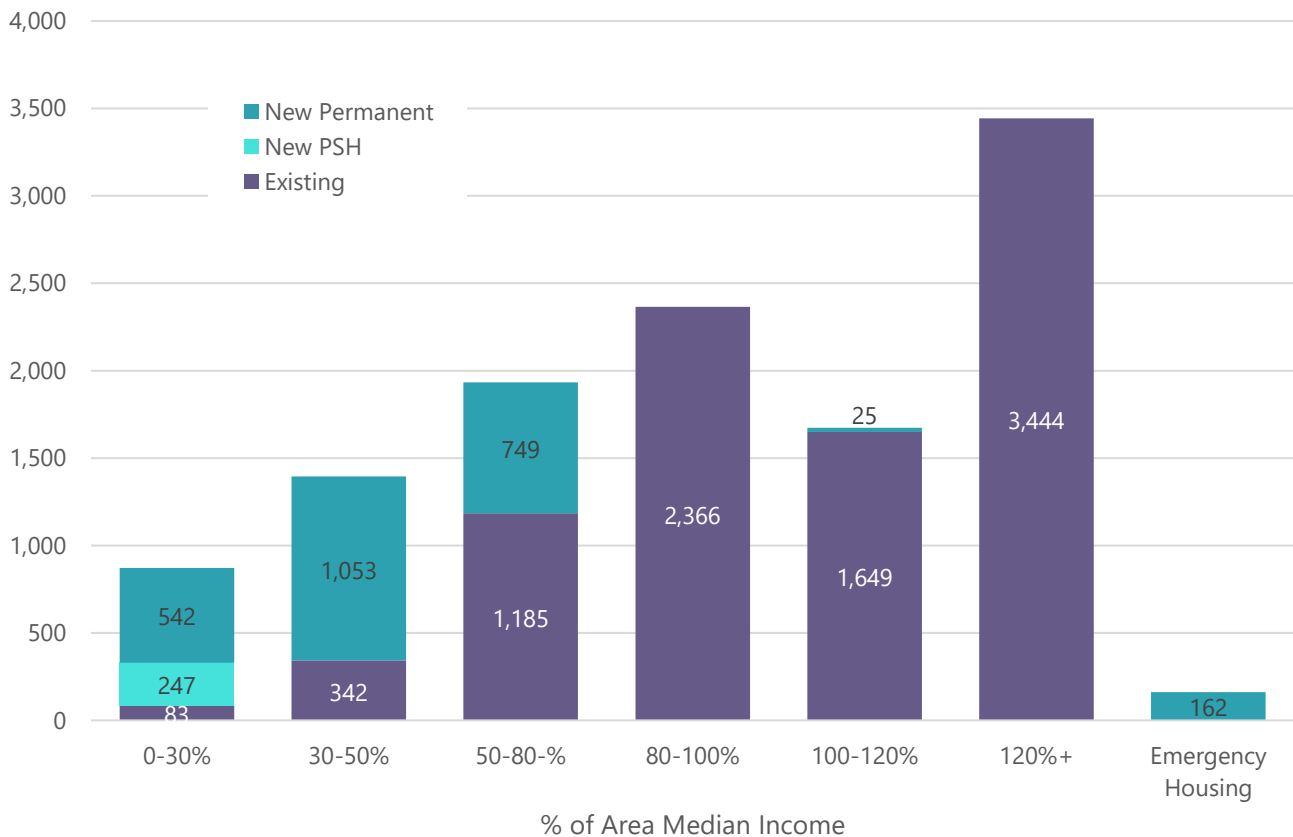


Source: City of Mill Creek, CoStar, Urban Footprint, Snohomish County, Leland Consulting Group

## Housing Needs by Income Band

HB 1220 requires jurisdictions to analyze their housing capacity by what household income level the new units can serve. Each county establishes income-based targets for each city within the county, and the cities must then demonstrate that they have sufficient land capacity for the number of units allocated in each income band, as well as capacity for emergency housing units. Mill Creek’s existing and target housing units for the 2019-2044 period are shown below in Figure 13.

**Figure 13. Mill Creek Existing and Target Housing Units by Income Band, 2019-2044**



Source: Snohomish County 2023 Housing Characteristics and Needs Report (HO-5), Appendix G, p. 16 (p. 397 of combined HO-5 Appendices)

## Land Capacity by Income Band

The first step in this analysis is to break down the land capacity for future units into income bands that those units could serve. Following Department of Commerce guidance, this is accomplished by grouping zones into **zone categories** based on the housing types that are allowed, and then grouping those categories by the **lowest potential income level that could be served by the housing types in that zone category**. This classification is shown below. Note that this analysis contains the proposed rezoning of the Mill Creek Boulevard Subarea as discussed in the previous section of this report.

The table below also shows the capacity results in each zone as well as the pending units that have either been built since 2020 or are currently under construction or permitted. These units were also classified by zone into the appropriate income bands based on housing type.

**Figure 14. Mill Creek Zone Category Classification**

Zone	Housing Types Allowed	Height	Assumed Density	Assigned Zone Category	Zone Capacity	Pending Units
<b>Residential</b>						
PRD	Single-Family, Townhomes, Multifamily, ADUs	35	6 Moderate Density		1	0
LDR	Single-Family, Townhomes, ADUs	35	4 Low Density		48	15
MDR	Single-Family, Townhomes, Condos, 2-6 Unit Apartments, ADUs	35	12 Moderate Density		0	35
HDR	Multifamily, Townhomes	50	24 Mid-Rise		0	0
MU/HDR	Multifamily, Single-Family, Townhomes, Middle Housing	50	30 Mid-Rise		0	0
<b>Commercial</b>						
CB (excluding MCB Subarea)	Multifamily (Secondary use)	40	16 Low-Rise		32	0
NB	Multifamily (above ground floor commercial only)	50	30 Mid-Rise		18	0
PCB	Multifamily (part of master plan)	60	24 Mid-Rise		0	0
EGUV	Multifamily (part of master plan)	60	27 Mid-Rise		246	354
<b>Business / Industrial</b>						
BP	None		0		0	0
OP	None		0		0	0
<b>Mill Creek Boulevard</b>						
MCB Proposed Rezoning	Multifamily	75	100 Mid-Rise		3380	0

Source: WA Department of Commerce, Leland Consulting Group

Finally, the aggregated housing needs for each income band from Snohomish County are compared with the total pending units and additional land capacity by income band. The results are shown below in Figure 15. As shown, Mill Creek has sufficient zoned capacity for future housing unit targets by income, with the proposed Mill Creek Boulevard Subarea rezoning which will be undertaken as part of this Comprehensive Plan update.

**Figure 15. Mill Creek Housing Targets by Income Band**

Income Band	Zone Category	Housing Needs	Aggregated Housing Needs	Pipeline Units	Remaining Housing Needs	Total Capacity	Surplus/ Deficit
0-30 PSH	Low-Rise, Mid-Rise	247					
0-30 Non PSH	Low-Rise, Mid-Rise	542	2,591	354	2,237	3,676	1,439
30-50	Low-Rise, Mid-Rise	1,053					
50-80	Low-Rise, Mid-Rise	749					
80-100	Moderate Density	0	25	35	-10	36	46
100-120	Moderate Density	25					
120+	Low Density	0	0	15	-15	48	63
		2,616	2,616	404	2,212	3,760	<b>1,548</b>

Source: WA Department of Commerce, Leland Consulting Group

## Adequate Provisions

In addition to this analysis by income band, HB 1220 also requires cities to show that their housing element “[m]akes adequate provisions for existing and projected needs of all economic segments of the community.” This analysis requires a **comparison of the historic rate of historic housing production to the rate of housing production needed to meet housing targets by income band**. The results of this analysis are shown below in Figure 16, using historic production data from the City, Census building permit survey, and PSRC’s Income-Restricted Housing Inventory. Similar to the analysis above, the income levels are correlated with housing types based on LCG’s analysis of housing prices affordable to various income levels in Mill Creek. As shown below, Mill Creek is showing a barrier to production of low-income units serving households earning under 80% AMI.

**Figure 16. Historic and Target Housing Production Trends in Mill Creek**

Income Band	Zone Category	Housing Needs	Aggregated Housing Needs	Annual Unit Production Needed 2020-2044	Historic Annual Average Unit Production 2013-2022	Barrier Exists?
0-30 PSH	Low-Rise, Mid-Rise	247				
0-30 Non PSH	Low-Rise, Mid-Rise	542	2,591	108	71	Yes
30-50	Low-Rise, Mid-Rise	1,053				
50-80	Low-Rise, Mid-Rise	749				
80-100	Moderate Density	0	25	1	3	No
100-120	Moderate Density	25				
120+	Low Density	0	0	0	20	No

Source: Snohomish County, City of Mill Creek, U.S. Census Building Permit Survey, PSRC Income-Restricted Housing Inventory

In order to address this shortfall, Commerce has developed a checklist for cities to address four categories of barriers to housing production:

- Development regulations
- Process obstacles
- Limited land availability and environmental constraints
- Funding gaps

Cities should document how these barriers may be affecting the production of units at the income level specified using this checklist, and document the potential steps they could take to overcome the barriers. Note that cities do not need to implement these steps as part of the comprehensive plan update, but they can help guide goal and policy development and cities will be required to produce a report documenting their progress towards increasing housing production five years after the adoption of the comprehensive plan.

The adequate provisions checklist and potential actions to remove barriers to housing production are found in Appendix A.

# Appendix A: Adequate Provisions Checklists

## Low-Rise or Mid-Rise housing barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
<b>DEVELOPMENT REGULATIONS</b>			
<b>Unclear development regulations</b>	No	While it can be confusing that some of the zones that are specific to a planning area, most of the basic zoning information is clearly laid out and easy to find.	Ensure that when the new subarea zoning is in place there are clear, easy to find guidelines.
<b>High minimum lot sizes</b>	No	The EGUV, PCB, and MU/HDR zones do not appear to have minimum lot sizes. The CB zone has a 7,200 SF minimum lot size (0.16 ac), which is not particularly large.	Like the EGUV, PCB, and MU/HDR zones, new subarea zoning should not have a minimum lot size.
<b>Low maximum densities or low maximum FAR</b>	Yes	The CB zone has a maximum density of 16 units per acre, while the PCB and MU/HDR zones have a maximum of 24 units per acre. These densities typically correspond to low-density multifamily housing types such as townhomes or garden apartments. The low maximum density is not enough to support ground floor retail and negatively impacts feasibility.	Increase maximum densities in zones that allow multifamily, or regulate the building envelope rather than the density as in the EGUV zone. In the subarea, an appropriate density is likely 100 units per acre.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
<b>Low maximum building heights</b>	Yes	Allowed heights in the CB, EGUV, PCB, and MU/HDR zones range from three to five stories. This negatively impacts feasibility, especially in a high-cost environment like Snohomish County. It is also likely not enough to offset the cost of providing ground floor commercial space.	Allow seven-story buildings in the new subarea zone.
<b>Large setback requirements</b>	No	Setbacks are limited in the CB, EGUV, and PCB zones, where the City wants to encourage buildings adjacent to sidewalks to facilitate walkability and support ground floor retail.	Ensure that large setbacks are not required in the new subarea zone.
<b>High off-street parking requirements</b>	Yes	Multifamily buildings are expected to have between 1.5 and 2.5 vehicular parking spaces per unit, depending on the number of bedrooms. Because multifamily in Mill Creek is likely to have surface or above-ground structured parking, this negatively impacts feasibility by significantly limiting the buildable area on site.	Reduce parking requirements, particularly in areas near transit or other essential services.
<b>High impervious coverage limits</b>	No	There do not appear to be impervious coverage limits in the CB, EGUV, PCB, or MU/HDR zones.	Ensure that this is consistent in the new subarea zone.



Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Lack of alignment between building and development codes	No	The building and development codes appear to align.	Ensure that this is consistent in the new subarea zone.
Other (for example: ground floor retail requirements, open space requirements, complex design standards, tree retention regulations, historic preservation requirements)	No	Ground floor retail requirements can have a large negative effect on feasibility due to the fact that the demand for new retail space is low and it therefore has to be subsidized by the housing above it.	Do not require ground floor retail or commercial space in the new subarea zone.
<b>PROCESS OBSTACLES</b>			
<b>Conditional use permit process</b>			
Design review	Yes	Design review is required for multifamily construction. This adds time, expense, and uncertainty to projects, therefore negatively impacting feasibility.	Limit the use of design review for housing in zones that allow multifamily housing.
Lack of clear and accessible information about process and fees	No	Information appears to be readily available.	
Permit fees, impact fees and utility connection fees	No	Mill Creek charges lower fees for multifamily units than single family units.	
<b>Process times and staffing challenges</b>			
SEPA process	No	SEPA is required throughout Washington, therefore it would be unlikely to have a specific	

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		impact on Mill Creek beyond its impact elsewhere.	
<b>LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS</b>			
<b>Lack of large parcels for infill development</b>	Yes	There are very few developable or redevelopable infill parcels in Mill Creek. Most of the vacant land is located within the subarea currently being studied.	Increase maximum height and density in areas that are ideal for multifamily housing to expand development feasibility. Ensure that the new subarea, where there is available land, can accommodate as many units as possible.
<b>Environmental constraints</b>			

## Supplementary barrier review checklist for PSH and emergency housing

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
<b>DEVELOPMENT REGULATIONS</b>			
<b>Spacing requirements (for example, minimum distance from parks, schools or other emergency/PSH housing facilities)<sup>1</sup></b>	No	There are no specific spacing requirements for PSH / emergency shelters	
<b>Parking requirements</b>	Possibly	It depends on how the building is classified - 1.5 to 2.5 spaces per unit are required for multifamily buildings, while boarding homes require one space per bed and rest homes require one space per three beds. Depending on which standard is applied, required parking could impact feasibility.	Apply rest home parking standards to PSH and emergency housing.
<b>On-site recreation and open space requirements</b>	Yes	Allowed lot coverage in the MDR, HDR, and MU/HDR zones is typically 40%, with an allowance to increase to 50% if parking is within the primary structure. This could impact the feasibility of PSH / emergency housing, especially because these uses should not be required to have a large number of parking spaces.	Allow for greater lot coverage (50% or more by right) for PSH / emergency housing

<sup>1</sup> Note that RCW 35A.21.430 expressly states requirements on occupancy, spacing, and intensity of use may not prevent the siting of a sufficient number of permanent supportive housing, transitional housing, indoor emergency housing or indoor emergency shelters necessary to accommodate each code city's projected need for such housing and shelter under RCW 36.70A.070(2)(a)(ii). The restrictions on these uses must be to protect public health and safety.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
Restrictions on support spaces, such as office space, within a transitional or PSH building in a residential zone	Yes	The medium- and high-density residential zones do not allow office uses in conjunction with housing. The high-density zone does allow health care facilities, but it is a conditional use.	Change regulations in the MDR, HDR, and MU/HDR zones to allow for office / health services uses in conjunction with PSH / emergency housing
Arbitrary limits on number of occupants (in conflict with <a href="#">RCW 35A.21.314</a> )	No	There are no stated limits on the number of occupants outside of density limitations that are applied to all housing within each zone.	
Requirements for PSH or emergency housing that are different than the requirements imposed on housing developments generally (in conflict with <a href="#">RCW 36.130.020</a> )	No	There are not different standards for PSH or emergency housing than other housing development.	Ensure that it is clear in the code what standards apply to PSH / emergency housing
Other restrictions specific to emergency shelters, emergency housing, transitional housing and permanent supportive housing	No	There are no other restrictions specific to PSH or emergency housing	

	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
<b>DEVELOPMENT REGULATIONS</b>			
Unclear development regulations			
High minimum lot sizes			

	<b>Is this barrier likely to affect housing production? (yes or no)</b>	<b>Why or why not? Provide evidence.</b>	<b>Actions needed to address barrier.</b>
<b>Low maximum densities or low maximum FAR</b>			
<b>Low maximum building heights</b>			
<b>Large setback requirements</b>			
<b>High off-street parking requirements</b>			
<b>High impervious coverage limits</b>			
<b>Lack of alignment between building and development codes</b>			
<b>Other (for example: ground floor retail requirements, open space requirements, complex design standards, tree retention regulations, historic preservation requirements)</b>			
<b>PROCESS OBSTACLES</b>			
<b>Conditional use permit process</b>			
<b>Design review</b>			
<b>Lack of clear and accessible information about process and fees</b>			
<b>Permit fees, impact fees and utility connection fees</b>			
<b>Process times and staffing challenges</b>			
<b>SEPA process</b>			

LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
<b>Lack of large parcels for infill development</b>			
<b>Environmental constraints</b>			

# Mill Creek Comprehensive Plan

## Land Capacity for Emergency Housing

RCW 36.70A.070(2)(c) requires that, in addition to land capacity for permanent housing, jurisdictions also show sufficient land capacity for their allocations of emergency housing as part of their comprehensive plan updates. This section outlines the methodology and results of this analysis, which is based on the Emergency Housing Land Capacity Analysis Option B (assumed density method) as outlined on pp. 44-48 of the WA Department of Commerce’s “Guidance for Updating Your Housing Element” (August 2023).<sup>1</sup>

The City of Mill Creek currently allows hotels in its EGUV, PCB and CB zones. As part of this Comprehensive Plan update, the City will be adding Emergency Housing and Emergency Shelter as allowed uses in the new TC zone (encompassing the Mill Creek Boulevard Subarea and former PCB zone), the EGUV zone, and the CB zone.

Per Commerce guidance, this analysis considers parcels in these zones which were classified as “Vacant” or “Underutilized” in the overall land capacity analysis as detailed above. Mill Creek does not have any intensity or spacing requirements for emergency housing which would limit the number of these potential parcels that could be used. After removing critical area acreage, the total net area in these zones available for emergency housing is **45.2 acres**.

This acreage is then multiplied by a density assumption for potential emergency shelters, measured in beds per acre. The density assumption is based on a combination of prototypes drawn from the Commerce guidebook which most closely match staff expectations for the types of potential emergency housing that could be developed in Mill Creek under current zoning. Details and densities on the prototypes used and the percentage of each prototype used in generating the average density assumption of **34 beds per acre** are shown below.

**Figure 1. Density Prototypes for Mill Creek Emergency Shelter Land Capacity Analysis**

Name	Location	Context	Zoning	Details	Density			
					Beds	Acres (beds/acre)	Percentage	
Tri-City Union Gospel Mission	Pasco	Urban	Light Industrial	1 story, parking, open space	162	6.30	25	25%
Serenity of House of Clallam County	Port Angeles	Suburban	Residential Moderate Density	Clustered 2 story buildings, parking, open space	70	1.89	37	75%
					<b>34</b>		<b>100%</b>	

Source: WA Department of Commerce, City of Mill Creek, Leland Consulting Group

Applying this density assumption to the available acreage by zone results in a capacity for **1,537 beds** on vacant and redevelopable parcels in zones where emergency housing is allowed in Mill Creek, as broken down below in Figure 2.

<sup>1</sup> <https://deptoocommerce.box.com/s/1d9d517g509r389f0mjpowh8isjpirlh>

Figure 2. Emergency Shelter Capacity by Zone in Mill Creek, 2020-2044

Zone	Net Acres	Beds / Acre	Emergency Shelter Bed Capacity
EGUV	9.2	34	313
CB	2.2	34	75
TC (formerly PCB + Mill Creek Boulevard Subarea rezone)	33.8	34	1,149
<b>TOTAL</b>	<b>45.2</b>		<b>1,537</b>

Source: WA Department of Commerce, City of Mill Creek, Leland Consulting Group

Mill Creek’s target for emergency housing is 162 beds, as shown in the target allocations below in Figure 3. Therefore, the city has a surplus capacity of 1,375 shelter beds for the 2020-2044 planning period, as shown below in Figure 3.

Figure 3. Emergency Shelter Capacity and Target in Mill Creek, 2020-2044

Total Emergency Shelter Need (Beds)	Total Emergency Shelter Capacity (Beds)	Surplus/ Deficit
162	1,537	1,375

Source: Snohomish County, WA Department of Commerce, City of Mill Creek, Leland Consulting Group



Policy Number	Policy Text	Reasons for Changes/Alignment with MPPs, CPPs, State Regs
LU-1	Maintain the character of Mill Creek including the diverse range of established residential neighborhoods throughout the City, vibrant central business/retail commercial districts, and an extensive network of neighborhood parks, trails, and open space corridors while ensuring well planned and cohesive future growth.	Planning Commission revision / request, Merged with old goal
LU 1.1	Allow a range of residential densities in an effort to diversify the City's housing opportunities, while maintaining compatibility with surrounding land uses, increasing affordability for all members of the community.	Planning Commission revision / request, Merged with old policy
LU 1.2	Encourage new residential developments to be aesthetically pleasing and designed to enhance neighborhood livability. Maintain vegetated areas to provide neighborhood identity; wildlife habitat corridors; pedestrian linkage to other residential developments and activity areas. Require future developments to protect environmentally sensitive areas.	MPP-DP-5, CPP-DP-35, Planning Commission revision / request, Language edit
LU 1.3	Support the redevelopment of underutilized lands to mixed use and higher density housing to meet housing and jobs targets allocated to Mill Creek to complement the development of centers and the enhancement of existing neighborhoods.	MPP-DP-4; CPP-DP-15, Planning Commission revision / request

LU 1.4	Increase housing density and jobs near high-capacity transit corridors to reduce vehicle miles traveled by facilitating access to transit, reduce traffic, and improve transit access, while supporting allocated targets for Mill Creek.	MPP-DP-22, Planning Commission revision / request, Language edit
LU-1.5	Incorporate environmental justice considerations in all planning efforts within the city, including efforts to avoid creating or worsening environmental health disparities.	N/A
LU-2	Encourage medium and high density residential and mixed-use neighborhoods in appropriate locations, within close proximity to commercial areas that offer public facilities, transit, and other urban services.	MPP-DP-1, MPP-DP-3, MPP-DP-25, CPP-DP-6, Planning Commission revision / request, Language edit
LU 2.1	Encourage well-designed mixed-use neighborhoods with a strong sense of place, access to transit, and inviting for pedestrian and bicycle activity.	MPP-DP-1, MPP-DP-3, MPP-DP-25, CPP-DP-36, CPP-DP-13, Planning Commission revision / request, Language edit
LU 2.2	Facilitate multi-purpose trips by incorporating pedestrian, bicycle, and transit-oriented design along public transportation corridors.	MPP-DP-16; MPP-DP-17; CPP-DP-40, Planning Commission revision / request, Merged with old policy
LU 2.3	Ensure new residential developments are compatible with surrounding land use patterns in height, scale, design, and quality, to provide a reasonable transition of residential densities.	Planning Commission revision / request, Merged with old policy
LU 2.4	Encourage the use of mixed-use development as a transition between office and commercial uses and surrounding residential neighborhoods. Multi-family residential uses on the primary access road are encouraged to provide office and/or retail uses on the ground floor with residential units above.	Planning Commission revision / request, Language edit

LU-3	Maintain and expand the vibrancy of existing business, commercial, and mixed-use areas through high-quality development standards.	MPP-DP-47, Language edit
LU 3.1	Ensure new residential developments are compatible with surrounding land use patterns in height, scale, design, and quality, to provide a reasonable transition of residential densities.	MPP-DP-47, Planning Commission revision / request, Language edit
LU 3.2	Enhance urban design of the City's key gateway locations through the utilization of the City's adopted Subarea Plans and Design Guidelines, and the City's Street, Stormwater, and Development Standards, and coordinate with adjacent jurisdictions, as necessary.	MPP-DP-19, Planning Commission revision / request, Language edit
LU 3.3	Ensure new commercial and mixed-use developments are high quality, compatible with surrounding land uses, and consistent with Mill Creek Design Review Standards. Ensure land-efficient parking facilities.	MPP-DP-3; MPP-DP-19, Planning Commission revision / request, Language edit
LU 3.4	Encourage the development of compact retail commercial nodes in the City and discourage the development of new strip mall retail centers.	MPP-DP-1, Planning Commission revision / request, Language edit
LU 3.5	Design public buildings and spaces that contribute to the City's livability, desirable sense of place, and community identity.	MPP-DP-5; MPP-DP-10; CPP-DP-34
LU 3.6	Ensure new business and commercial developments preserve and integrate natural vegetation and features, including creeks, ravines, and wetlands, into the design of the development. Design of such developments must take into account vehicular circulation and traffic impacts.	MP-DP-5, MPP-DP-13, MPP-DP-40, Planning Commission revision / request, Language edit

LU 3.7	Require new light industrial developments to be designed similarly to the surrounding business and commercial uses and/or according to new design standards.	Planning Commission revision / request
LU 3.8	Require new light industrial developments to be designed similarly to the surrounding business and commercial uses and/or according to new design standards.	MPP-DP-3, MP-DP-5, MPP-DP-13, MPP-DP-40, Planning Commission revision / request, Language edit, Merged with old policy
LU 3.9	Encourage the use of buffers and natural areas to achieve tree preservation, wildlife habitat, and to provide visual separation between contiguous developments and different land uses. Design arterial and collector streets in residential areas to include roadway buffers.	MP-DP-5, MPP-DP-13, MPP-DP-40, CPP-DP-33, Planning Commission revision / request, Language edit
LU-4	Ensure coordination between development regulations and local organizations' efforts to address and improve upon healthy lifestyle options within the City such as promoting pedestrian and bicycle improvements.	MPP-DP-1; MPP-DP-16, Planning Commission revision / request
LU 4.1	Support agricultural and aquatic uses which enhance the natural food chain throughout the Puget Sound region and its capacity to produce fresh and minimally processed foods, by encouraging community gardens, farmers markets, and other small-scale initiatives.	MPP-DP-20; CPP-DP-41, Planning Commission revision / request
LU 4.2	Promote cohesive development of the community through safe and attractive pedestrian and bicycle pathways which connect residential, natural, and commercial areas of the City.	MPP-DP-3, MPP-DP-5, MPP-DP-15, Planning Commission revision / request, Language edit
LU 4.3	Identify and address existing health disparities and improve health outcomes in all residents within the City.	MPP-DP-18, Planning Commission revision / request

LU-5	Work cooperatively with Snohomish County to ensure annexation areas are developed consistent with City development standards and have an orderly transition to City governance and are adequately serviced by existing facilities or can be provided for in an efficient manner.	CPP-DP-12; MPP-DP-28; MPP-DP-29; CPP-DP-7, Planning Commission revision / request, Language edit
LU 5.1	Consider establishing future land use designations on properties within the City's Municipal Urban Growth Area, particularly undesignated properties.	Planning Commission revision / request, Language edit
LU 5.2	Review and provide comments on proposed developments, regulations, and plans, within the Municipal Urban Growth Area to ensure compatibility with the City's regulations.	MPP-DP-28, Planning Commission revision / request, Language edit
LU 5.3	Where the City's Municipal Urban Growth Area overlaps with the City of Lynnwood's Municipal Urban Growth Area, coordinate with Lynnwood and Snohomish County as these areas develop as part of future annexation considerations.	CPP-DP-22; CPP-DP-23, Language edit
LU 5.4	Future annexations of surrounding areas shall be logical expansions of, and be contiguous with, the City's boundaries.	Planning Commission revision / request
LU 5.5	Evaluate potential annexations based on the City's ability to provide sufficient services to the area and its fiscal and operational impacts to the City.	MPP-DP-28, MPP-DP-29, MPP-DP-45, Planning Commission revision / request, Language edit
LU 5.6	Evaluate potential annexations based on anticipated financial burden to the City resulting from annexation.	MPP-DP-28, MPP-DP-29, MPP-DP-45, Language edit
LU 5.7	City provided infrastructure, utilities, and other services shall be planned for and made available concurrently with, or within a reasonable time after, annexing land to the City.	MPP-DP-28, MPP-DP-29, MPP-DP-45

LU-6	Coordinate and engage with public agencies, tribes, and other organizations on matters of future growth and development.	MPP-DP-8, MPP-DP-26, Language edit
LU 6.1	Ensure the City's growth is consistent with the Growth Management Act, VISION 2050, and Snohomish County's regulations, while maintaining the City's established identity.	MPP-DP-21, MPP-DP-26
LU 6.2	Cooperate with agencies that have jurisdiction over aspects of development in Mill Creek and ensure decisions and actions taken promote the City's goals.	MPP-DP-26, Planning Commission revision / request, Language edit
LU 6.3	Educate and encourage the participation of all residents, community associations, tribes, and other interest groups in the planning and decision-making process, including, but not limited to, the preservation of environmental and culturally significant sites.	MPP-DP-8; MPP-DP-7, Planning Commission revision / request, Language edit
LU 6.4	Recognize and work to enhance contiguous systems that cross jurisdictional boundaries in community planning, development, and design; including natural systems, land use patterns, and transportation and infrastructure systems.	MPP-DP-13; MPP-DP-14, MPP-DP-21; MPP-DP-26, Language edit
LU 6.5	Ensure zoning designations can accommodate the projected population, housing, and employment targets of the City	CPP-DP-12, Planning Commission revision / request, Merged with old policy, Language edit
LU 6.6	Preserve significant citywide and regional historic, visual, and cultural resources, including public views, landmarks, archaeological sites, historic, and cultural landscapes.	MPP-DP-6, MPP-DP-9
LU-7	Ensure equitable access to City resources, programs, and development processes, through proactive and transparent outreach.	N/A

LU 7.1	When considering development proposals within the City, ensure that proposed regulatory or administrative actions protect private property rights	Language edit
LU 7.2	Ensure development permits are evaluated and processed in a timely manner without reducing the City's adopted environmental, level of service, and land use standards.	MPP-DP-47, Language edit
LU 7.3	Reduce disparities in access to opportunity for the City's residents through inclusive community planning and targeted public and private investments that meet the needs of current and future residents and businesses.	MPP-DP-2; CPP-DP-38
LU 7.4	Evaluate and use a range of strategies to mitigate potential physical, economic, and cultural displacement of marginalized residents and businesses in areas of planned redevelopment.	N/A
LU-7.5	Incorporate environmental justice considerations in all planning efforts within the city, including efforts to avoid creating or worsening environmental health disparities.	N/A

Policy Number	Policy Text	Reasons for Changes/Alignment with MPPs, CPPs, State Regs
H-1	Plan to accommodate a sufficient supply of housing throughout Mill Creek to meet the needs of all segments of the community, including moderate-income, low-income, extremely low-income, special needs households and senior housing.	MPP-H-2, CPP-HO-1, MPP-H-3, CPP-HO-6, Language edit
H 1.1	Plan for consistency with housing unit targets, definitions, and regional growth strategy developed by Snohomish County, PSRC, and the Department of Commerce.	MPP-H-1, MPP-H-2, CPP-HO-1, CPP-HO-5, Language edit
H 1.2	Facilitate housing needs for special needs groups through partnerships with developers and service organizations.	MPP-H-3, CPP-HO-2, CPP-HO-8, Language edit, Split old policy
H 1.3	Identify risks of potential displacement of low-income households and historically marginalized populations through development, planning, and market pressures. Strive to mitigate these effects to the extent feasible, using guidance from the City's Racial Equity and Displacement Analysis Report.	MPP-H-12, CPP-HO-15, Planning Commission revision / request, Split old policy
H 1.4	Work to improve the city's jobs-housing balance by providing a variety of housing types and affordability levels for the city's workforce	MPP-H-7, MPP-H-8, CPP-DP-18, Language edit
H 1.5	Establish policies to support fair and equal access to housing for all persons regardless of race, color, religion, gender, sexual orientation, age, national origin, familial status, source of income, or disability	MPP-H-5, MPP-H-2, CPP-HO-1
H 1.6	Consider the development of a Housing Action Plan for Mill Creek to create implementable strategies to meet the city's housing needs for all residents, including identifying and reducing barriers to special needs housing.	CPP-HO-1, CPP-HO-8, CPP-HO-15



H-2	Plan for a wide variety of housing types throughout the city, including single-family homes, moderate density housing types such as duplexes and ADUs, and multifamily units, to provide improved housing choices to all income levels and demographic groups in the Mill Creek community.	MPP-H-9, CPP-HO-4, Language edit
H 2.1	Allow Accessory Dwelling Units (ADUs) and middle housing types including duplexes in Mill Creek's low density residential areas to improve housing choice and affordability throughout the city.	MPP-H-1, MPP-H-2, CPP-HO-6, MPP-H-9, CPP-HO-4, Language edit
H 2.2	Create opportunities for more ownership housing in Mill Creek at a variety of income levels and in various housing types and locations.	MPP-H-10, CPP-HO-11, CPP-HO-13, Planning Commission revision / request
H 2.3	Work to reduce barriers to homeownership opportunities for communities of color.	MPP-H-10, CPP-HO-11, CPP-HO-13, Planning Commission revision / request
H 2.4	Develop and refine the Development Design Standards to preserve existing architectural character and ensure new development is aesthetically consistent.	MPP-H-2, CPP-HO-1, MPP-H-9, CPP-HO-4
H-3	Plan to accommodate Mill Creek's new housing units at a variety of scales and in a variety of neighborhoods throughout the city, with an emphasis in designated subareas.	CPP-HO-1, MPP-H-2,
H 3.1	Allow and encourage the development of moderate density and middle housing types in single-family residential zones to increase the variety of housing types.	MPP-H-9, CPP-HO-4
H 3.2	Develop and refine the Development Design Standards to preserve existing architectural character and ensure new development is aesthetically consistent.	Planning Commission revision / request, Language edit

H 3.3	Create opportunities for new housing growth into designated Subareas and near High Capacity Transit to maximize transit investment, create high-quality, compact communities to improve walkability, reduce emissions, and provide access to high-quality employment and services.	MPP-RGS-8, CPP-DP-14, CPP-DP-16, MPP-H-7, MPP-H-8, CPP-DP-18, Planning Commission revision / request
H 3.4	Encourage development of new housing with easy walkable or bikeable access to parks and open space to promote health and well-being.	MPP-DP-1, CPP-DP-36
H-4	Plan to accommodate a sufficient capacity for regulated affordable housing units to meet regional goals and the needs of Mill Creek residents, recognizing that these units are unlikely to be built without significant subsidy.	MPP-H-4, CPP-HO-2
H 4.1	Encourage affordable housing development in the city through engagement and partnerships with developers, incentives, inclusionary zoning, fee waivers, and other strategies.	MPP-H-11, Language edit
H 4.2	Coordinate with surrounding jurisdictions, Snohomish County, and regional affordable housing nonprofits and coalitions such as the Alliance for Housing Affordability to provide housing for all economic segments of the community.	MPP-H-11, CPP-HO-3, CPP-HO-1, CPP-HO-2, Language edit
H 4.3	Support the preservation, repair, and rehabilitation of existing housing stock, including regulated and naturally occurring affordable housing.	MPP-H-3, CPP-HO-6, Language edit

Policy Number	Policy Text	Reasons for Changes/Alignment with MPPs, CPPs, State Regs
ENV-1	Maintain an attractive and high-quality environment and improve air and water quality, soils, and natural systems to ensure the health and well-being of people, animals, and plants through creative design, landscaping, and control of impacts.	MPP-En-3
ENV 1.1	Protect Mill Creek’s image, which is characterized by an abundance of natural vegetation indigenous to the northwest, by encouraging new development to provide landscaping that emphasizes the use of native plant materials (including drought resistant species), achieves compatibility between varied uses, and provides attractive entrances into the city.	Planning Commission revision / request
ENV 1.2	Preserve natural vegetation that significantly contributes to the aesthetic values and adds to the natural scenic views of Mill Creek. Require all new developments to establish planted buffers or cutting preserves adjacent to arterial and collector streets, consistent with the City subdivision regulation and Design Review Board guidelines.	Planning Commission revision / request
ENV 1.3	Work to maintain and improve air and water quality and ensure all residents have equitable access to clean air, clean water, and a healthy natural environment.	MPP-En-4, CPP-Env-8
ENV 1.4	Reduce impacts to vulnerable populations and areas that have been disproportionately affected by noise, air pollution, or other environmental or climate change impacts.	MPP-En-8, MPP-CC-6
ENV 1.5	Protect and enhance the urban tree canopy and native vegetation to support community resilience, mitigate urban heat, manage stormwater, protect habitat, conserve energy, improve mental and physical health, and strengthen economic prosperity.	MPP-En-9, MPP-En-13, City request / revision
ENV 1.6	Support the use of integrated pest management and reduce the use of toxic pesticides, fertilizers, and other harmful products that present a risk to the health of the environment and humans.	MPP-En-19, CPP-Env-10
ENV 1.7	Establish and support programs that mitigate climate change and manage and reduce the spread of terrestrial and aquatic invasive species that are harmful to natural ecological functions.	CPP-Env-11, draft Menu of Measures number 288, draft Menu of Measures number 289, Planning Commission revision / request

ENV-2	Continue to be good stewards of the environment by taking appropriate measures to reduce the environmental impacts of future development and City operations.	City request / revision
ENV 2.1	Support private and public efforts to obtain conservation easements in areas with natural features such as creek corridors, wetlands, significant vegetated backdrops, scenic vistas, and wildlife habitat.	Planning Commission revision / request
ENV 2.2	Use integrated and interdisciplinary approaches for environmental planning and assessment.	MPP-En-1, MPP-En-2, City request / revision
ENV 2.3	Work with neighboring jurisdictions and tribes to identify and protect open space networks and wildlife corridors throughout the city and municipal urban growth area through appropriate regulations or other mechanisms such as public acquisition, easements, voluntary agreements, supporting the efforts of conservation organizations, and other best practices.	CPP-Env-2, CPP-Env-5
ENV 2.4	Protect, enhance, and restore ecosystems in order to meet tribal treaty rights and conserve culturally important consumptive and non-consumptive resources (including foods and medicinal plants) that could be adversely impacted by climate change.	Draft Menu of Measures number 3
ENV-3	Promote high standards of environmental protection and mitigation, including sensitive treatment and preservation of the natural environment and critical areas based upon best available qualitative and quantitative information available including Best Available Science rules.	MPP-En-6, CPP-Env-1
ENV 3.1	Ensure that land development activities avoid straightening, channelizing, and rerouting existing drainage courses and that structures and impervious surfaces are set back from streams and wetlands so that riparian vegetation and wetland buffers are maintained in a naturally vegetated condition. Encourage low impact development techniques.	City request / revision
ENV 3.2	Enhance, restore, protect, and avoid alteration of wetlands, streams and associated buffers, retaining these features in their natural state to preserve wildlife habitat, maintain hydrologic functions, and protect water quality and quantity	City request / revision

ENV 3.3	Ensure that buffer widths for streams and wetlands meet or exceed the minimum width necessary to protect the integrity, function, and value of the resources and are based upon Best Available Science rules adopted by the State of Washington.	City request / revision
ENV 3.4	Only allow alteration of wetlands and streams after it has been demonstrated that no design alternative exists to afford reasonable economic use of the property and when compensatory mitigation is provided that adequately compensates the hydrologic functions, water quality functions, and lost wildlife habitat. Proposals to alter wetlands and streams shall reflect and incorporate Best Available Science rules.	N/A
ENV 3.5	Protect streams, wetlands, and their associated buffers in perpetuity through the use of tracts, conservation easements, or other means to achieve permanent protection.	Grammatical edit
ENV 3.6	Clearly identify wetlands and other watercourses on development site plans and City Critical Areas Maps.	N/A
ENV 3.7	Comply with and implement Critical Area Regulations based upon Best Available Science rules and with consideration of the presence of threatened or endangered species.	Merged with old policy
ENV 3.8	Designate, protect, and enhance significant open spaces, natural resources, and critical areas	MPP-En-11, City request / revision
ENV 3.9	Protect and restore wetlands and corridors between wetlands, to provide biological and hydrological connectivity that fosters resilience to climate impacts.	Draft Menu of Measures number 285, Planning Commission revision / request
ENV-4	Develop and enforce policies and regulations that protect habitat within North Creek and its tributaries to support healthy wildlife and accelerate the recovery of salmon and other threatened and endangered species.	MPP-En-16, Planning Commission revision / request
ENV 4.1	Work collaboratively to identify and protect valuable fish and wildlife habitat throughout the city. Look for gaps or inefficient practices in the land use plan and development regulations that could impede climate resilience and address these with updated provisions.	Draft Menu of Measures number 298, CPP-Env-2, Draft Menu of Measures number 298, Planning Commission revision / request

ENV 4.2	Work cooperatively with other agencies to implement a comprehensive, science-based recovery plan for federally-listed threatened or endangered species and also include protection for and restoration of habitat areas that support designated species of local or state significance	MPP-En-14, CPP-Env-4, Merged with old policy
ENV 4.3	Preserve and establish buffer zones with native vegetation and trees that are resilient to climate change between developments and watercourses to protect the integrity of the aquatic systems, to enhance water quality, and to ensure adequate habitat for fish and wildlife.	Draft Menu of Measures number 335, City request / revision
ENV 4.4	Aim for no net loss of ecosystem composition, structure, and functions and strive for net ecological gain to enhance climate resilience for species under stress from climate change including cold-water fish.	Draft Menu of Measures number 273, draft Menu of Measures number 287, draft Menu of Measures number 291, Planning Commission revision / request
ENV-5	Minimize development impacts to natural features by encouraging the use of low impact development techniques, collaboration with watershed planning, and other innovative environmentally sensitive development practices, design, materials, construction, and on-going maintenance.	MPP-En-5, CPP-Env-7, Merged with old policy
ENV 5.1	Protect and restore natural hydrological functions and water quality to maximize the ecological benefits and climate resilience of riparian ecosystems.	MPP-En-17, MPP-En-20, CPP-Env-6, draft Menu of Measures number 268
ENV 5.2	Educate residents on issues pertaining to fish and wildlife and the protection of habitats of threatened populations.	N/A
ENV 5.3	Educate residents about water quality and quantity management issues and incentivize environmental stewardship on private and public lands to protect and enhance wetlands, streams, and other watercourses that provide habitat and drinking water supplies.	MPP-En-10
ENV 5.4	Ensure compliance with the National Pollutant Discharge Elimination System (NPDES) Permit and that land developments include stormwater management that meet the requirements of the Washington State Department of Ecology Stormwater Management Manual adopted by the City.	Language edit

ENV 5.5	Continue efforts with regional coalitions, Snohomish County, and other jurisdictions to comply with and promote erosion and stormwater control measures, reduce pollution, and improve water quality throughout the City and the municipal urban growth area.	Grammatical edit
ENV 5.6	Manage water resources sustainably in the face of climate change through smart irrigation, stormwater management, preventative maintenance, water conservation and wastewater reuse, plant selection that prioritizes native and drought tolerant species, and landscape management.	Draft Menu of Measures number 321
ENV 6	Meet all air quality standards, respond and adapt to the impacts of climate change, and minimize greenhouse gas emissions in support of federal, state, regional, and local emissions reduction goals, including targets adopted by the Puget Sound Clean Air Agency.	MPP-CC-1, CPP-CC-1, MPP-En-22, Merged with old goal
ENV 6.1	Support the achievement of regional greenhouse gas emissions reduction targets through land use decisions, development regulations, and by expanding the use of conservation and alternative energy sources, electrifying the transportation system, and reducing vehicle miles traveled by increasing alternatives to driving alone.	MPP-CC-3, CPP-CC-6
ENV 6.2	Protect and restore natural resources that sequester and store carbon such as forests and wetlands.	MPP-CC-4, CPP-CC-4
ENV 6.3	Advance actions that support resilience and adaptation to climate change impacts by identifying and addressing the impacts of climate change and natural hazards on water, land, infrastructure, health, and the economy. Prioritize actions to protect the most vulnerable populations	MPP-CC-7, MPP-CC-8, MPP-CC-9, CPP-CC-5
ENV 6.4	Plan for new and relocation of existing essential public facilities and hazardous industries away from the 500-year floodplain, where feasible.	MPP-CC-10, CPP-CC-7
ENV 6.5	Support the implementation of the state's climate change initiatives and work toward developing a common framework to analyze climate change impacts when conducting environmental review under the State Environmental Policy Act.	CPP-CC-2
ENV 6.6	Develop and maintain City staff members' technical expertise and skills related to climate change and environmental justice to support communitywide implementation of equity and resilience.	Draft Menu of Measures number 317

ENV 6.7	Develop and implement an urban heat resilience strategy that includes land use, urban design, urban greening, and waste heat reduction actions.	Draft Menu of Measures number 371
ENV 6.8	Participate with regional transit and other transportation agencies to promote and encourage carpooling, ridesharing, and other public and private transportation programs that result in improved air quality in Mill Creek, the North Creek Basin, and surrounding region	N/A
ENV 6.9	Participate in and coordinate with the Puget Sound Air Pollution Control Authority to ensure that all wood stoves installed for use in new homes meet the applicable U.S. Environmental Protection Agency and state standards.	N/A
ENV 6.10	Encourage the Puget Sound Air Pollution Control Agency to establish a monitoring station within the North Creek Drainage Basin to ensure that the air quality remains within acceptable standards.	N/A
ENV-7	Consider and address the potential for human-caused risks and the natural environment's capacity to absorb and reduce the impacts of natural hazard events.	Grammatical edit
ENV 7.1	Develop resilience hubs, create evacuation plans, and develop and implement notification alerts to prepare for emergency events.	Draft Menu of Measures number 113, draft Menu of Measures number 322, draft Menu of Measures number 323
ENV-8	Establish and/or support programs that work to reduce greenhouse gas emissions and increase energy conservation, including the retrofit of existing buildings, expansion of alternative and clean energy use within the public and private sector, and the use of environmentally sustainable building techniques and materials.	CPP-CC-3
ENV 8.1	Ensure that land clearing, grading, and filling practices minimize soil erosion and sedimentation into streams, wetlands, and other watercourses. Ensure that all required temporary and permanent erosion control measures are adequately installed to control water runoff prior to, during, and after land clearing or disturbance activities.	City request / revision, Grammatical edit



ENV 8.2	Discourage land development proposed on slopes over 15 percent. Consider development on slopes between 15 – 40 percent provided that specific site engineering can demonstrate that subsequent development is safe and will not adversely affect drainage courses, vegetation, or slope stability. Prohibit development on slopes 40 percent or greater, and establish minimum setbacks to protect slope stability.	Grammatical edit
ENV 8.3	Require all construction activities to initiate and follow “Best Management Practices” to reduce dust and suspended particulates during the construction process and to facilitate construction related dust and dirt remains on-site during construction.	N/A
ENV 8.4	Reduce building energy use through green building practices and retrofit of existing buildings, and prioritize the use of lower-carbon building materials in new construction and building retrofits to reduce embodied carbon.	MPP-CC-2, draft Menu of Measures number 482
ENV-9	Ensure that excessive noise and light pollution does not impair permitted land use activities in residential, commercial, and industrial zoning districts and consider potential impacts that may overburden vulnerable populations.	MPP-En-7, CPP-Env-9
ENV 9.1	Consider implementing reasonable and effective noise mitigation measures for arterial street improvements if the existing or projected noise levels exceed adopted City standards.	Language edit
ENV 9.2	Work with state and county agencies to mitigate highway and arterial noise and air quality concerns, while also addressing aesthetic concerns	Language edit
ENV 9.3	Evaluate the benefit of measures designed to mitigate arterial street noise (such as noise walls and berms) and address impacts on the pedestrian environment and character of the neighborhood.	N/A
ENV 9.4	Evaluate noise impacts when reviewing measures designed to keep traffic volumes and speeds within legal limits on collectors and arterials.	N/A
ENV 9.5	Require new residential development to include traffic noise abatement design and materials where necessary to minimize noise impacts from arterials.	N/A

ENV 9.6	Ensure that required planting buffers along streets in residential neighborhoods take noise levels of adjacent streets into consideration. Where noise levels exceed City standards, ensure that landscaping includes berms and vegetation that attenuate noise impacts	Planning Commission revision / request, Language edit
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Policy Number	Policy Text	Reasons for Changes/Alignment with MPPs, CPPs, State Regs
EV-1	Provide for continued economic growth and development in Mill Creek that nurtures the community's established identity and economic assets, while supporting regional growth and economic strategies.	MPP-EC-17, MPP-Ec-2, CPP-ED-1, Planning Commission revision / request, Language edit
EV 1.1	Work cooperatively on economic issues with local businesses and industries, County and regional governments, Chamber of Commerce, workforce development, labor organizations, and regional partners such as the Economic Alliance of Snohomish County.	MPP-Ec-2, CPP-ED-1, Language edit
EV 1.2	Regularly review code requirements, permitting and licensing timelines to ensure they are conducive to business while also serving the needs of the community and not reducing the City's adopted aesthetic, environmental, and land use standards.	CPP-ED-8, MPP-EC-6, CPP-ED-16, Planning Commission revision / request, Language edit
EV 1.3	Support existing and new business, employment, and housing opportunities in and near the subareas (Town Center, South Town Center and East Gateway Urban Village) and other commercial hubs throughout the city to enhance economic vitality and increase sales tax revenues. More people living in and near these areas will help create stronger demand for businesses and services.	Language edit
EV-1.4	Plan for commercial and business development opportunities in future annexation areas through coordination with Snohomish County on appropriate future land use designations and infrastructure investments.	MPP-Ec-2, MPP-Ec-6, CPP-ED-12, Planning Commission revision / request, Split old goal
EV-2	Support economic activities that provide a strong tax base, contribute revenues to the City, and provide diverse living wage jobs and economic opportunities for all Mill Creek residents.	CPP-ED-5, MPP-Ec-9, Planning Commission revision / request
EV 2.1	Develop an equitable tax structure to keep and attract businesses while maintaining the City's ability to provide a high level of service for commercial and business park uses.	Planning Commission revision / request
EV 2.2	Develop strategies to promote widely shared prosperity and diverse living wage jobs for all Mill Creek residents.	MPP-Ec-9, CPP-ED-5, Planning Commission revision / request, Language edit

EV 2.3	Explore the potential to increase the Mill Creek minimum wage to encourage prosperity for residents and employees in the city.	CPP-ED-5, MPP-Ec-9, Planning Commission revision / request
EV 2.4	Include economic vitality policies consistent with existing or planned capital facility and utility investments. Identify and implement strategies to ensure timely development of needed facilities	CPP-ED-10, Planning Commission revision / request
EV-3	Establish a connection between housing and economic development to increase quality of life and reduce traffic and commute times by improving jobs-housing balance, promoting affordable housing to workers employed in Mill Creek, and focus on medium- and high-density housing development in designated subareas to create a "critical mass" to support commercial and retail services in those areas.	CPP-ED-14, MPP-Ec-18, MPP-Ec-21, CPP-ED-4, Planning Commission revision / request, Language edit
EV 3.1	Through adopted development regulations and design standards, encourage a convenient and diverse set of retail businesses and amenities to serve the needs of residents of the City and surrounding area, particularly in designated subarea	MPP-Ec-17, MPP-Ec-21, CPP-ED-13, Split old goal
EV 3.2	Take steps to ensure that Mill Creek's subareas including Town Center and EGUV remain economically viable and desirable places to shop, dine, and gather.	MPP-Ec-21, Language edit
EV 3.3	Encourage pedestrian-oriented commercial uses through placemaking to provide opportunities for residents in the City and surrounding area to shop and dine and to provide economic benefits to the City through sales tax generation.	CPP-ED-3, Planning Commission revision / request, Language edit
EV-4	Develop implementation programs that encourage economic growth and protect existing businesses, while attracting new business and industries, particularly key regional industry clusters and businesses providing goods and services for export.	Planning Commission revision / request, Language edit
EV 4.1	Promote and market Mill Creek as a desirable location for key regional industries, including healthcare, technology, life sciences, and aerospace to diversify the city's economy and employment opportunities.	CPP-ED-13, MPP-Ec-3, MPP-Ec-1, CPP-ED-1, Language edit

EV 4.2	Dedicate City resources towards part-time or full-time Economic Development staff.	MPP-Ec-1, CPP-ED-1, CPP-ED-13, MPP-Ec-3, MPP-Ec-5, Planning Commission revision / request
EV 4.3	Sustain and enhance arts and cultural institutions to foster an active and vibrant community life	MPP-Ec-20, Planning Commission revision / request
EV 4.4	Encourage capital improvement projects in commercial areas, designated subareas, and near high-capacity transit to improve pedestrian and vehicular circulation systems and stimulate more intensive and concentrated activity	MPP-EC-1, CPP-ED-1, CPP-ED-13, MPP-Ec-21, Language edit
EV-5	Encourage efforts to sustain and respect the natural environment in the city and surrounding areas through support of climate friendly, sustainable, and resilient businesses, business and industrial practices, and technologies.	CPP-ED-15, MPP-Ec-16, MPP-Ec-8, Language edit
EV 5.1	Encourage business practices that minimize environmental impacts, such as the reduction of waste, and businesses that promote environmental sustainability, especially those addressing climate change and resilience.	CPP-ED-15, MPP-Ec-16
EV 5.2	Foster a supportive regulatory environment, tools, and programs that support the establishment and growth of small and startup businesses in a variety of sectors, through funding, technical assistance, or small business tenanting in new development.	CPP-ED-15, MPP-Ec-16, CPP-ED-14
EV-6	Strive to sustain and increase economic opportunities for all Mill Creek residents by supporting small, women-owned, veteran-owned, and minority-owned businesses, job training and education programs, and consideration of displacement of existing businesses.	CPP-ED-2, MPP-Ec-7, MPP-Ec-12, CPP-ED-18, Planning Commission revision / request
EV 6.1	Foster a supportive regulatory environment, tools, and programs that support the establishment and growth of small and startup businesses in a variety of sectors, through funding, technical assistance, or small business tenanting in new development.	MPP-Ec-7, CPP-ED-2, Planning Commission revision / request

EV 6.2	Identify potential physical, economic, and cultural displacement of existing locally owned, small businesses as a result of development or redevelopment or market pressure. Consider a range of strategies to mitigate the impacts of displacement to the extent feasible.	MPP-Ec-12, CPP-ED-18, Planning Commission revision / request
EV 6.3	Ensure sufficient land and services for future school needs to support high-quality education and job training resources for all residents.	MPP-Ec-10, MPP-Ec-11, CPP-ED-11, Planning Commission revision / request
EV 6.4	Support and recognize the contributions of the region's culturally and ethnically diverse communities and Native Tribes, including helping the region continue to expand its international economy.	MPP-Ec-15

Policy Number	Policy Text	Reasons for Changes/Alignment with MPPs, CPPs, State Regs
P-1	Provide an equitable, high-quality parks and recreation system that provides a variety of amenities and is welcoming to people of all ages, abilities, incomes, and participation levels.	N/A
P 1.1	Focus park, recreation, and open space improvements and expansions in areas of high need and in areas that have been historically underserved	MPP-En-15
P 1.2	Implement a City-provided recreation program to serve all age groups, physical and mental abilities, cultures, and interests.	Language edit
P 1.3	Park and facility designs shall meet the requirements of the Americans with Disabilities Act (ADA).	Language edit
P 1.4	Enhance the quality of life in Mill Creek with a broad range of parks and recreation courses supported by residents.	Language edit
P 1.5	Encourage safety and security as prime considerations in the design and development of park and recreation facilities and features, and implement designs that are consistent with Crime Prevention through Environmental Design (CPTED) best practices.	Language edit, split old policies
P 1.6	Require durable park and recreation features and fixtures that are able to withstand wear while remaining safe and functional.	Language edit, split old policies
P 1.7	Appropriately locate trees and landscaping to enhance and avoid barriers to natural surveillance of park and recreation areas.	Language edit, split old policies
P 1.8	Complete a Parks, Recreation, and Open Space Plan to evaluate how best to serve the needs of the community as it changes. The plan should evaluate opportunities to meet the City's Level of Service (LOS) Standards and Facility Guidelines (see Background or Appendix) or alternative standards based on analysis to provide a variety of indoor and outdoor recreation opportunities, including but not limited to: active recreation facilities such as youth softball/baseball fields, full size soccer fields, tennis courts, volleyball courts, a multiple-use recreation and multigenerational community center, gym facilities, bicycle trails, and jogging or fitness trails.	Planning Commission revision / request, Language edit, split old policies
P-2	Create unique and vibrant recreation experiences for Mill Creek residents and visitors.	Planning Commission revision / request, Language edit
P 2.1	Strengthen volunteerism with an outreach program to encourage and incentivize community participation.	Planning Commission revision / request

P 2.2	Maintain a list of public and private recreational facilities and programs in Mill Creek (including publicly and privately managed facilities), neighboring jurisdictions, and Snohomish County.	Language edit
P 2.3	Conduct program evaluations, surveys, and community engagement to understand and support meeting community needs	Language edit
P 2.4	Install gateway and wayfinding signage, features, and fixtures to create a welcoming identity for Mill Creek's park facilities.	Planning Commission revision / request, Language edit
P 2.5	Create a vibrant cultural arts environment that builds community identity and promotes public participation in the arts, strengthens cultural and economic vitality in the City, contributes to the quality of life of residents, and activates the public realm with signature art and cultural festivals and events.	MPP-Ec-20
P 2.6	Encourage development of outdoor plazas and squares within public and private developments for community events, visual and performance based public art opportunities, and to encourage community connections.	MPP-DP-11
P-3	Ensure a variety of park types and sizes that are easily accessible by varied transportation methods and well-distributed throughout the city.	MPP-En-15, CPP-EN-22, Planning Commission revision / request, Language edit
P 3.1	Incorporate adequate on-site and off-site parking for vehicles and bicycles at parks and recreation areas, and enhance access to transit where applicable. Incorporate public restrooms at parks and recreation area.	Planning Commission revision / request, Language edit
P 3.2	When considering the acquisition of park land, make infrastructure improvements to increase connectivity to and from parks, recreation areas, open spaces, and trails.	Language edit, split old policies
P 3.3	Invest in multi-modal infrastructure improvements to promote park access for bicyclists and pedestrians, promote healthy lifestyles, reduce overall traffic volumes and limit the need to devote scarce recreational resources to parking.	Planning Commission revision / request
P-4	Pursue public lands to meet the recreational needs of the community to provide high quality and convenient parks and recreation facilities for both active and passive recreation activities for the Mill Creek's current and future populations.	Planning Commission revision / request Language edit
P 4.1	Identify additional opportunities to increase the use of parks and school district properties for recreation use and programming by the City of Mill Creek.	MPP-DP-11, Language edit
P 4.2	Secure public access to facilities owned by other public jurisdictions or agencies in order to meet community park needs.	Language edit



P 4.3	Engage the Parks and Recreation, Art and Beautification, and Design Review Boards when reviewing proposed improvements to the park system.	Language edit
P 4.4	Maintain a relationship with Washington State, Snohomish County, neighboring jurisdictions, and school districts to facilitate and support a coordinated effort in managing parks, recreation facilities, and other shared resources.	MPP-En-12 MPP-Env-2, Language edit, Split old policies
P 4.5	Ensure proper coordination with Snohomish County, the City of Everett, and the City of Bothell regarding McCollum Park, North Creek Park, and other key regional recreation facilities.	MPP-En-12 MPP-Env-2, Language edit, Split old policies
P 4.6	Cooperate with federal, state, and local agencies and private organizations in development of the local and regional trail system.	MPP-En-12 MPP-Env-3
P-5	Leverage the park and open space system to emphasize and protect the environmental qualities and natural amenities within the city and municipal urban growth area.	Language edit
P 5.1	Use greenbelts and open space areas to emphasize the entryways and edges of the city, enhance property values and tax bases, and strengthen the identity of Mill Creek by prioritizing its natural resources.	MPP-DP-40, Planning Commission revision / request, Language edit, Split old policies
P 5.2	Encourage the preservation of Mill Creek's natural resource areas and open spaces.	MPP-DP-40 MPP-En-11, Language edit, Split old policies
P 5.3	Allow public use of natural resource areas where site conditions allow	Language edit, split old policies
P 5.4	Use open space areas to protect sensitive areas such as unstable slopes or wetlands, enhance water quality, preserve wildlife habitat or migration routes, provide visual relief, enhance the streetscape, and reduce noise levels.	Language edit, split old policies
P 5.5	Promote increased public awareness of the value of natural resource areas and open spaces by incorporating education features in parks.	Language edit
P 5.6	Encourage the retention of natural vegetation around park perimeters to define park boundaries, provide visual relief, reduce noise and visual intrusion, and buffer recreation activities from incompatible uses.	Language edit
P-6	Periodically evaluate the City's Level of Service (LOS) Standards and Facility Guidelines (see Background or Appendix) for parks and recreation facilities to ensure that they continue to reflect the community's needs and the City's ability to provide and maintain such facilities.	N/A

P 6.1	Utilize the Level of Service (LOS) Standards and Facility Guidelines when planning, and acquiring funding for, the expansion and enhancement of Mill Creek's park and recreation system. Update the standards as needed as part of development of a communitywide parks, recreation, and open space plan.	Language edit
P-7	Consider all available financing mechanisms and grants for funding the parks and recreation program's upkeep and growth.	N/A
P 7.1	Site, design, and develop park and recreation facilities with consideration given to the long-term maintenance, operation, and renovation or replacement costs.	Grammar edit
P 7.2	Develop long-term financing strategies that address the funding needs for future capital projects, public art, and maintenance and operation of existing facilities.	N/A
P 7.3	Require developers to offset the impact of proposed development on the City's parks and recreation system.	Language edit, merged old policy
P 7.4	Require developers to contribute to the open space and recreational facilities system, including the provision of neighborhood parks and mini-parks that support the active and/or passive recreation needs of the community.	Planning Commission revision / request, Language edit, Merged old policies
P 7.5	Use community park mitigation fees to finance facilities that are owned by other jurisdictions or agencies, but that are used by the City to meet community park needs.	Language edit

Policy Number	Policy Text	Reasons for Changes/Alignment with MPPs, CPPs, State Regs
T-1	Coordinate with Puget Sound Regional Council, Snohomish County, Sound Transit, and surrounding jurisdictions to ensure consistency among agencies in implementing the Regional Transportation Plan and Regional Growth Strategy.	Planning Commission revision / request, Language edit
T 1.1	Develop and operate an efficient multimodal system that supports the Regional Growth Strategy in coordination with neighboring jurisdictions and regional agencies.	MPP-T-7, Language edit
T 1.2	Maintain and operate transportation systems to provide safe, efficient, and reliable movement of people, goods, and services.	MPP-T-11
T 1.3	Continue to work with and support WSDOT, the Port of Everett, Sound Transit, Community Transit, and other agencies that connect and provide transportation services to Mill Creek and the surrounding community.	MPP-EC-4-5, MPP-T-27-28, Planning Commission revision / request
T 1.4	Reduce the need for new capital improvements through investments in Intelligent Transportation System technology, demand management strategies, and operational activities that improve the efficiency of the current systems.	MPP-T-3, Planning Commission revision / request
T 1.5	Emphasize transportation investments that provide options to walk, roll, bike, and take transit, especially to and within mixed-use centers and to connect with regional centers, including future light rail stations, outside of Mill Creek	MPP-T-12-13, MPP-T-15, Planning Commission revision / request, Language edit
T 1.6	Adopt and implement development regulations to encourage new land uses that facilitate multi-purpose trips, minimize the number and length of vehicle trips, and increase multimodal street connectivity, especially to and within the mixed-use centers	MPP-T-16-18, Language edit
T 1.7	Adopt and implement development regulations to facilitate deliveries and passenger pick-up/drop-off activity, especially to and within mixed-use centers.	MPP-T-31, Language edit
T 1.8	Increase the resiliency of the transportation system, protect it against disasters, develop prevention and recovery strategies, and plan for coordinated emergency responses.	MPP-T-33-34
T 1.9	Continue to work with local, regional, and state agencies to respond to emerging trends and technologies in transportation, especially to facilitate travel to and within mixed-use centers. (Examples: Electric vehicle charging stations, automated and connected vehicles, on-demand smart signals, E-bikes, and micromobility)	N/A

T-2	Orient the Mill Creek transportation system toward people walking, rolling, and biking, and ensure that it is accessible and safe for all.	Planning Commission revision / request
T 2.1	Provide pedestrian facilities on both sides of all roadways throughout Mill Creek and connect with other public and/or private multiuse path systems.	Policy retained per City staff, Planning Commission revision / request, Language edit
T 2.2	Separate sidewalks on public streets with a planting strip to increase pedestrian safety and comfort of travel and avoid potential conflicts with vehicular movements. Incorporate aesthetic features where appropriate, such as a serpentine or meandering configuration, to be consistent with existing community character.	Policy retained per City staff, Planning Commission revision / request, Language edit
T 2.3	Provide bicycle facilities on all arterial and collector roadways to enhance active transportation connectivity and provide traffic calming effects.	Policy retained per City staff, Planning Commission revision / request, Language edit
T 2.4	Ensure that active transportation facilities connect neighborhoods to transit stops with amenities such as lighting, seating, shelters, and boarding pads.	Policy retained per City staff, Planning Commission revision / request, Language edit
T 2.5	Design multiuse paths to accommodate people walking, rolling, and biking within and connecting parks, recreational amenities, and major open space corridors.	Policy retained per City staff, Planning Commission revision / request, Language edit
T 2.6	Reduce travel time and distance for people walking, rolling, biking, and taking transit by providing new connections such as crosswalks, neighborhood cut-through paths, and pedestrian-oriented alleyways.	MPP-T-16-17
T 2.7	Consider equity and equal access when planning for transportation improvements, programs, and services, including for historically underserved communities and vulnerable populations.	N/A
T 2.8	Implement transportation programs and projects that are accessible to all people of the community, including people with disabilities, the elderly, the young, people with no or low income, and people with special needs.	MPP-T-9-10, Planning Commission revision / request
T 2.9	Comply with the federal Americans with Disabilities Act (ADA), current Mill Creek ADA Transition Plan, and enact appropriate design standards for all sidewalks, intersection corners, crosswalks, and multiuse paths.	MPP-T-10, Language edit
T 2.10	Identify specific pedestrian and bicycle improvements along priority route segments to create a safer and more comfortable system by developing an active transportation plan.	N/A
T-3	Focus on transportation investments that minimize impacts to the natural environment and promote a healthy community.	Language edit

T 3.1	Develop strategies to reduce greenhouse gas emissions and negative climate change impacts, such as promoting compact mixed-use development centers served by transit, constructing a well-connected pedestrian and bicycle system, and implementing Transportation Demand Management programs.	MPP-CC-3, MPP-CC-12, MPP-T-29-30
T 3.2	Participate in efforts by county, regional, and state agencies to improve programs and management strategies designed to prevent and reduce contamination of street runoff and storm water and improve fish passage.	MPP-T-32
T 3.3	Develop the transportation system to encourage physical activity, provide access to nature, and improve safety.	MPP-DP-44, MPP-T-4-5, MPP-T-29-32
T 3.4	Improve existing street tree canopies to increase pedestrian safety and comfort, produce traffic calming effects, and support the natural environment.	N/A
T-4	Pursuant to the Growth Management Act, maintain an inventory of Mill Creek's transportation facilities and establish appropriate Level of Service Guidelines and Standards.	Language edit
T 4.1	The Transportation Element shall include inventories of all major transportation modal networks, including automobile, transit and freight; and pedestrian and bicycle facilities; and multiuse paths.	MPP-T-7, MPP-T-15-17
T 4.2	In coordination with WSDOT and PSRC, the City of Mill Creek adopts the Level of Service (LOS) Guidelines and Standards listed below for State Highways and City intersections. State Highway LOS Guidelines Designated by PSRC • LOS E/mitigated (access/signal timing/transit) for SR 96 and 527 Mill Creek LOS Standards for City Intersections • LOS C for local residential to local residential intersections • LOS D for local residential to collector; collector to collector; & collector to arterial intersections • LOS E for all other City intersections	MPP-T-4, MP-T-5
T 4.3	Adopt and implement development regulations and a transportation concurrency management program based on the adopted level of service standards for vehicles, walking, biking, and transit.	MPP-DP-52-54, Language edit
T 4.4	Maximize the utility of the existing transportation system and lower overall life-cycle costs through effective maintenance and preservation programs.	MPP-T-1-2, MPP-T-4, Language edit
T-5	Identify funding strategies to address the future needs of the transportation system and coordinate these strategies with neighboring jurisdictions and regional agencies.	N/A
T 5.1	Biannually update and prioritize transportation improvement projects within Mill Creek's six-year Capital Improvement Program.	MPP-RC-11-12, MPP-T-6, Consultant revision, Language edit

T 5.2	Pursue alternative transportation financing methods, such as transportation benefit districts, user fees, and other potential options to support ongoing maintenance, preservation, and operation of the transportation system.	MPP-T-6
T 5.3	Utilize the 20-year project list and finance plan to incorporate fiscally constrained and implementable projects into the Transportation Impact Fee (TIF) program and six-year Capital Improvement Program.	MPP-RC-11-12, MPP-T-6, MPP-T-15, Consultant revision
T 5.4	Pursuant to the Growth Management Act, if probable funding will be insufficient to meet the established Level of Service Standards for transportation facilities, reassess the Land Use Element and/or the Level of Service Standards and adjust as necessary.	MPP-RC-11-12, MPP-T-6
T 5.5	Coordinate the planning, design, and financing of transportation facility improvements with the transportation and land use plans of neighboring jurisdictions to identify opportunities to maximize benefits with limited financial resources	N/A
T 5.6	Identify opportunities to partner with new developments, private organizations, and regional transit agencies to provide additional intra-city transit service connections.	N/A

Policy Number	Policy Text	Reasons for Changes/Alignment with MPPs, CPPs, State Regs
U-1	Coordinate with service providers to support planned growth, particularly in the Mill Creek Boulevard Subarea where growth is being targeted.	CPP-PS-2, CPP-PS-15
U 1.1	Approve urban development only in those areas where services are or will be available and are adequate to support the proposed demands without adversely affecting current users.	Language edit
U 1.2	Coordinate with other jurisdictions and utility providers to ensure there is adequate utility system capacity to serve the land uses envisioned and to identify areas where interjurisdictional cooperation is necessary.	MPP-PS-3, CPP-PS-15, City revision / request, Language edit
U 1.3	Provide updates of population, employment, and development forecasts to the utility providers and adjacent jurisdictions to use in their long-range facility planning efforts or during plan updates.	CPP-PS-2, CPP-PS-15, Planning Commission revision / request, Language edit
U-2	Through coordination with the utility providers and the application of appropriate development regulations, work to ensure that utilities are provided and maintained in a manner that is fiscally and environmentally responsible, aesthetically acceptable to the community, and does not pose an undo health risk or nuisance to those who live and work in the community.	Grammar edit
U 2.1	Process necessary permits and approvals in a fair and timely manner to ensure predictability in the installation of necessary utilities.	N/A
U 2.2	Adopt and maintain development regulations that permit utility facilities in all appropriate zoning districts subject to appropriate public and City review (i.e., SEPA review and/or a Conditional Use Permit).	N/A
U 2.3	Utility facilities designated as “essential public facilities” by the state, county and/or Snohomish County Tomorrow are subject to the Conditional Use permitting process established in the Mill Creek Municipal Code.	N/A

U 2.4	Require development proponents to mitigate their proportional impacts on public utilities to ensure that proportional costs are borne by those responsible for the impact rather than the present City residents and rate payers, and that Levels of Service are not degraded below acceptable levels as a result of new developments.	N/A
U 2.5	Where feasible, possible and appropriate, require all new utility facilities to be located underground. In addition, require reasonable screening and/or the architecturally compatible design of all new above ground utility facilities. New above ground facilities shall have with Design Review Board approval.	Planning Commission revision / request
U 2.6	To minimize construction-related disruptions to the public, reduce the cost of utility facilities, and prevent excessive deterioration of the roadway surface, promote, where possible, the co-location of new utility distribution and transmission facilities in shared trenches and the coordination of utility construction activity	N/A
U 2.7	Routinely cooperate with all utilities authorized to provide services within Mill Creek about the schedules for projects within the City's Capital Improvement Program that offer an opportunity to install infrastructure during the construction of City projects.	N/A
U 2.8	Collaborate with service providers to locate human services near transit, particularly bus rapid transit.	N/A
U-3	Promote sustainable, affordable, and equitable access to utilities for all Mill Creek residences and businesses.	N/A
U 3.1	Encourage telecommunication service providers to engage in equitable long-term planning for telecommunications construction, reconstruction, and facility upgrades, including provisions to ensure that the system's capacity, design and equipment will allow users to take advantage of innovative uses, services and technology	MPP-PS-16, CPP-PS-20, City revision / request, Language edit
U 3.2	Consider climate change when siting utilities in Mill Creek and support efforts to increase the resilience of utilities.	MPP-PS-19, MPP-PS-20, MPP-PS-21, CPP-PS-9



U 3.3	Promote demand management and conservation.	MPP-PS-4, MPP-PS-8, MPP-PS-9, MPP-PS-14, MPP-PS-24, CPP-PS-6, CPP-PS-7
U 3.4	Support renewable energy resources and investments in utility infrastructure to facility moving to low-carbon energy sources.	MPP-PS-13, MPP-PS-15, CPP-PS-12, CPP-PS-13
U 3.5	Support the growth of Mill Creek resident- and business-owned distributed energy resources.	N/A
U 3.6	Encourage electric vehicle infrastructure as a means of decarbonizing the transportation sector in Mill Creek.	City revision / request
U-4	Implement and monitor Level of Service Standards and service providers' plans for utilities in Mill Creek and the MUGA.	CPP-PS-14
U 4.1	Pursuant to RCW Chapter 57, review Alderwood Water and Wastewater District's (AWWD) and Silver Lake Water and Sewer District's (SLWSD) Plan Updates, which are required every six years, to ensure that the plans' land development patterns and population and employment assumptions are consistent with the policies and assumptions of the City's Comprehensive Plan.	MPP-PS-3, City revision / request, Language edit
U 4.2	Continue to support and work with Alderwood Water and Wastewater District (AWWD) and Silver Lake Water and Sewer District (SLWSD) to provide Mill Creek residents, workers, and visitors with high quality drinking water.	MPP-PS-22, Planning Commission revision / request, City revision / request

Policy Number	Policy Text	Reasons for Changes/Alignment with MPPs, CPPs, State Regs
CF-1	Monitor capital facilities to provide high-quality, sustainable, equitable, and affordable services for current and future Mill Creek residents and employees.	MPP-PS-2, CPP-PS-18
CF 1.1	Maintain an inventory and monitor the capacity of capital facilities within the City. If it is determined that probable funding will be insufficient to meet the established minimum Level of Service Standards, reassess the Land Use Element and/or reevaluate the established Level of Service Standards.	MPP-PS-3
CF 1.2	In reviewing proposals to annex property into the City, assess the impacts of the annexation to the adopted Level of Service Standards. The City may consider appropriate mitigation measures to offset any identified impacts to the existing Level of Service as a condition of annexation	N/A
CF 1.3	Update the six-year Capital Improvement Plan in conjunction with the biennial budget and identify specific capital improvement projects and funding sources. The budgeting of capital facilities projects shall be consistent with and help to achieve the goals and policies as set forth in the Comprehensive Plan	Language edit
CF 1.4	Develop and coordinate compatible capital facility construction standards for all service providers in the Municipal Urban Growth Area	CPP-PS-16
CF 1.5	Monitor the capacity of City facilities and resources (including City Hall North and South) to ensure the needs of the community and City operations are being met.	Language edit
CF 1.6	Require development proponents to mitigate their proportional impacts on public school capital facilities.	N/A
CF 1.7	Work cooperatively with the Everett School District to plan for school facilities to meet the existing and future community needs, including siting and designing schools to support safe, walkable access for Mill Creek students.	MPP-PS-26, CPP-PS-21
CF 1.8	Identify public facilities on which impact fees will be spent.	N/A
CF 1.9	Provide a Public Works Maintenance Facility that will serve the department over the long-term.	N/A
CF-2	Develop, implement, and maintain a long-range financial plan for City operations.	N/A

CF 2.1	Develop and implement a Capital Facilities Plan to assist in the long-range financial resource planning for public improvements and programs. The plan shall include Level of Service standards and guidelines for various public facilities and ensure that appropriate services to support development are adequate at the time of occupancy and use.	CPP-PS-14, CPP-PS-15
CF 2.2	Develop financial policies for the City that enable the Council and City Manager to maintain a favorable financial condition.	N/A
CF 2.3	Explore new sources of funding to support Mill Creek infrastructure and services.	MPP-RC-11
CF-3	Continue to provide stormwater systems that are planned, developed, and maintained to reduce flooding, protect water quality, and preserve natural systems.	N/A
CF 3.1	Continue to operate a stormwater management program to integrate the private facilities with a unified public system to ensure the long-term compliance with State Department of Ecology regulations, including the Western Washington Phase II NPDES Permit.	City revision / request, Language edit
CF 3.2	Inspect all privately-owned stormwater systems within the city limits to ensure that they are functioning properly using the Washington State Department of Ecology's Stormwater Management Manual for Western Washington, as adopted by the City. Ensure that privately owned stormwater facilities are maintained in accordance with current City policies. Notify the owners of privately held stormwater facilities of the need to maintain said facilities.	City revision / request, Language edit
CF 3.3	Inspect, clean, and maintain City-owned stormwater facilities using the Washington State Department of Ecology's Stormwater Management Manual for Western Washington, as adopted by the City.	City revision / request, Language edit
CF 3.4	For new land development proposals and City capital improvement projects, require stormwater management facilities that incorporate detention and water quality treatment facilities, along with specific maintenance and management programs, consistent with the Department of Ecology Stormwater Management Manual for Western Washington adopted by the City	N/A
CF 3.5	To reduce the volume of urban stormwater runoff and its impacts on local and regional water quality, encourage the use of low impact development methods to minimize the impacts of water quantity and quality upon receiving waters.	N/A
CF-4	Facilitate protecting and enhancing the environment and public health and safety when providing capital facilities.	MPP-PS-1

CF 4.1	As the City grows, ensure that fire and police capital facilities meet the needs of the increased population.	MPP-PS-1 MPP-PS-17
CF 4.2	Provide public safety communications through participation in the Snohomish County Emergency Radio System (SERS). Real Estate Excise Tax (REET) monies may be used to fund the City's participation.	MPP-PS-17
CF 4.3	Consider climate change, economic, and health impacts when siting and building capital facilities and support efforts to increase the resilience of existing infrastructure in Mill Creek.	MPP-PS-19, MPP-PS-20