



**PLANNING COMMISSION MEETING
TUESDAY, JUNE 24, 2025 – 6:30 PM
501 DELTA AVENUE
MARYSVILLE, WA 98270**

AGENDA

The Planning Commission meeting is a hybrid meeting which you are welcome to attend in person or via Teams. Anyone wishing to provide verbal public comment is encouraged to pre-register by contacting the Staff Contact for the agenda item outlined above the day prior to the meeting. Those providing verbal public comment will need to provide their name, address, e-mail and phone number for the public record.

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CALL TO ORDER

1. ROLL CALL

2. APPROVAL OF MINUTES

2.1 Approval of 5/13 Minutes

Suggested Motion: I move to approve the May 13, 2025 minutes.

[PC 05132025.pdf](#)

3. AUDIENCE PARTICIPATION *(for topics not on the agenda)*

4. PUBLIC HEARING

5. OLD BUSINESS

5.1 Middle Housing and Accessory Dwelling Units - Additional Policy Questions
No action requested at this time; discussion only.

Memo re Middle Housing Additional Policy Questions

6. NEW BUSINESS
7. DIRECTOR'S COMMENTS
8. ADJOURNMENT
9. NEXT MEETING - July 8, 2025

CITY COUNCIL AGENDA ITEMS AND MINUTES

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Agenda Bill

PLANNING COMMISSION AGENDA ITEM REPORT

DATE: June 24, 2025

SUBMITTED BY: Stacy Jones, Community Development

ITEM TYPE: Minutes

AGENDA SECTION: **APPROVAL OF MINUTES**

SUBJECT: Approval of 5/13 Minutes

SUGGESTED ACTION: Suggested Motion: I move to approve the May 13, 2025 minutes.

SUMMARY: See attached minutes.

ATTACHMENTS:
[PC 05132025.pdf](#)

Community
Development



501 Delta Ave
Marysville, WA 98270

**Planning Commission
Meeting Minutes**

May 13, 2025

CALL TO ORDER

Chair Leifer called the meeting to order at 6:30 p.m.

1) ROLL CALL

Present: Chair Stephen Leifer, Commissioner Gary Kemp, Vice Chair Brandon Whitaker, Commissioner Raymond Miller, Commissioner John Ray

Staff: Interim Community Development Director Jeff Wilson, Planning Manager Chris Holland, Principal Planner Angela Gemmer, Associate Planner Kathryn Bird, Planning Tech Emily Tsan

Excused: Commissioner Jerry Andes, Commissioner Shanon Jordan

2) APPROVAL OF MINUTES

2.1 Planning Commission meeting minutes - April 8, 2025

Planning Commission minutes - April 8, 2025

Motion to approve April 8, 2025 Planning Commission meeting minutes moved by Commissioner Gary Kemp seconded by Commissioner Raymond Miller.

AYES: ALL

3) AUDIENCE PARTICIPATION

None

4) PUBLIC HEARING

4.1 Updates to Commute Trip Reduction (CTR) Plan (2025-2029) and CTR Ordinance

Commute Trip Reduction Memo and Exhibits

Associate Planner Kathryn Bird reviewed the proposed updates to the existing CTR ordinance. She explained that this is a regular update as required by the WSDOT. It will amend requirements for employers with 20 or more employees, the CTR goals, definitions, requirements for biennial progress reports, and a requirement for a transportation fair. There is also an updated CTR plan that incorporates and addresses changes to the code.

Vice Chair Whitaker asked clarification questions about requirements for employers with 20 or more employees. Staff responded.

Commissioner Kemp asked about the "good faith" effort employers are required to make. Ms. Bird was not sure but thought Community Transit might be able to answer this.

Commissioner Miller asked how this was enforced. Planning Manager Holland clarified that this would fall back on WSDOT or CT to follow up.

Chair Leifer asked if there is a difference in the way employers that are located on a bus line are looked at. Ms. Bird replied that they all have the same requirements, but there are different options they can all choose from. There was some discussion about employers that would be subject to the CTR requirements.

The public hearing was opened. There were no public comments.

Motion to close the public hearing moved by Commissioner John Ray seconded by Commissioner Gary Kemp.

AYES: ALL

Motion to approve the amendments to MMC Chapter 11.52, Commute Trip Reduction and approval of the 2025 - 2029 CTR Plan for adoption by Ordinance moved by Vice Chair Brandon Whitaker seconded by Commissioner Raymond Miller.

AYES: ALL

4.2 Code Amendment Regulating Garage Sales

Garage Sale Code Amendments and Memo

Exhibit 4

Exhibit 5

Motion to close the public hearing moved by Commissioner John Ray seconded by Commissioner Gary Kemp.

AYES: ALL

4.2 Code Amendment Regulating Garage Sales

Planning Tech Emily Tsan reviewed this item as previously had been discussed. She presented two options regarding the temporary use code for consideration.

Commissioner Ray asked why Planning staff had recommended something other than what the Planning Commission had suggested. Planning Manager Holland explained that the reason for this had to do with previous enforcement needs. This would give the City the ability to enforce when the more egregious examples come up. Staff has heard public nuisance concerns from the community related to parking. This would only become an issue if there were complaints. There was concern by the Planning Commission that they had spent a lot of time deliberating this topic and came to their conclusion with that in consideration. Commissioner Ray felt staff was undermining that deliberation.

Chair Leifer agreed that the Planning Commission had considered the pros and cons in depth. If there is a parking concern, he felt that code enforcement officers could deal with it. Commissioners Ray and Leifer expressed a desire to stay with their original recommendation. Planning Manager Holland noted that the Planning Commission has the opportunity to make whatever recommendation they choose and recommend that to Council, but staff believes the other option is preferred; it also aligns with neighboring communities, but it is ultimately up to the Commission what they choose to support. Commissioner Ray expressed support for Recommendation 1 to allow no more than six days in a row and up to 12 days in a calendar year.

Commissioner Miller noted he had missed the meeting where this had been discussed. Other commissioners brought him up to speed. There was some debate about police being able to respond to these concerns. Commissioner Miller agreed with Recommendation 1.

Vice Chair Whitaker recalled the spirited conversation they had had about this topic and the conclusion they came to. Because of that discussion and conclusion he concurred with continuing with Recommendation 1. He noted that it could always come back to the Planning Commission for revision or additional discussion if something isn't working.

The public hearing was opened. There were no public comments.

Motion to close the public hearing moved by Commissioner Raymond Miller seconded by Commissioner Gary Kemp.

AYES: ALL

Motion to recommend approval of the proposed amendments (Option 1 as previously discussed by the Planning Commission) regulating garage sales to City Council for adoption by ordinance moved by Commissioner John Ray seconded by Commissioner Raymond Miller.

AYES: ALL

5) OLD BUSINESS

5.1 Middle Housing Update

Memo re Middle Housing Update

Principal Planner Gemmer reviewed this item. At the May 5th City Council work session, staff requested policy direction from City Council on Middle Housing and Unit Lot Subdivisions topics. She reviewed City Council direction relation to these items. Staff will be preparing code amendments that align with the policy direction received from City Council and will be presenting these to the Planning Commission at the June work sessions for review and feedback.

Commissioner Kemp asked about setbacks for unit lot subdivisions. Principal Planner Gemmer explained that all of the dimensional standards are based on the starting parent parcel.

Commissioner Ray commended staff for their presentation at the library last night. He noted that the City has a decision to make about lot sizes. They can make them bigger, but that opens up the potential of more lots being built on a bigger lot. When they talk about lot sizes, they need to understand what lot sizes they start with and if they want to make it bigger or smaller.

Principal Planner Gemmer explained that they need to adopt something by June 30 or default to the state standards which are very permissive. She summarized that staff will be proposing some interim regulations in June to meet the deadline but will continue to fine tune the regulations throughout the summer.

6) NEW BUSINESS

None

7) DIRECTOR'S COMMENTS

Interim Community Development Director Jeff Wilson introduced himself and was welcomed by the Planning Commission. Commissioners asked questions about Director Wilson's philosophy and background. Questions and answers followed.

8) ADJOURNMENT

Motion to adjourn the meeting at 7:39 p.m. moved by Vice Chair Brandon Whitaker seconded by Commissioner Raymond Miller.

AYES: ALL

9) NEXT MEETING - June 3, 2025



Agenda Bill

PLANNING COMMISSION AGENDA ITEM REPORT

DATE: June 24, 2025

SUBMITTED BY: Angela Gemmer, Community Development

ITEM TYPE: Discussion Item

AGENDA SECTION: **OLD BUSINESS**

SUBJECT: Middle Housing and Accessory Dwelling Units - Additional Policy Questions

SUGGESTED ACTION: No action requested at this time; discussion only.

SUMMARY: Middle Housing and Accessory Dwelling Unit policy discussion on key issues. See attached memo for details.

ATTACHMENTS:
[Memo re Middle Housing Additional Policy Questions](#)

MEMORANDUM

DATE: June 24, 2025
TO: Planning Commission
FROM: Angela Gemmer, Principal Planner
SUBJECT: Middle Housing and Accessory Dwelling Units – Key Policy Direction
ECC: Jeff Wilson, Interim Community Development Director
Chris Holland, Planning Manager

Exhibits:

Exhibit 1 Middle Housing Potential Exemption Areas Maps
Exhibit 2 [Middle Housing User Guide](#)
Exhibit 3 Projected vs. Actual Residential Yield in Multi-family Zones
Exhibit 4 [City Council June 23rd meeting packet](#) (see items 12 – 14)

Introduction

To complete work on the Middle Housing and Accessory Dwelling Unit regulations, policy direction is requested from Planning Commission on some additional key matters. At the May 5th work session, City Council provided general guidance and sideboards for most of these matters; however, further direction that aligns with this guidance is needed from Planning Commission along with direction on some additional policy matters. These topics are as follows:

- Topic 1 – Accessory dwelling unit – size cap
- Topic 2 – Simple Fix to Existing Single-Family Zones to Accommodate Middle Housing
- Topic 3 – Options for Amending Single-family Residential Zones while Accommodating Middle Housing
- Topic 4 – Middle Housing Exemptions for Locational or Physical Constraints
- Topic 5 – Preserving Land Capacity in the R-12 and WR-R-6-18 Multi-family Zones
- Topic 6 – Master Planned Senior Communities Allowed Density
- Topic 7 – If Single Family Residences Continue to be Permitted in Multi-family Zones, Should a Height Increase for Single Family Residences and Duplexes be Allowed?

Topic 1 – Accessory dwelling unit – size cap¹

Currently [MMC 22C.180.030](#) requires accessory dwelling units (ADUs) to be at least 200 square feet and allows them to be up to 50 percent of the total floor area² of the single family residence on the property. Accessory dwelling units are also limited to a total of two bedrooms.

[House Bill 1337](#) requires cities to allow two ADUs per lot and allow each ADU to be up to 1,000 square feet. The City's current standard that allows ADUs to be up to 50 percent of the floor area of the single family residence, coupled with the State's 1,000 square feet allowance per ADU, would allow for two ADUs on a property to cumulatively be built up to the total floor area of the primary single family

¹ At prior work sessions, the Planning Commission provided guidance on rear yard setbacks for accessory dwelling units (ADUs) and whether ADUs should be allowed accessory to a duplex. The Planning Commission's direction on those matters will be reflected in the regulations presented at the Public Hearing.

² Floor area includes garage square footage.

residence or greater if the single family residence is under 2,000 SF. Some hypotheticals on what the City’s current standard coupled with the State’s allowance of 1,000 SF per ADU could look like is detailed in **Figure 1** below.

Figure 1				
	1,000 SF Primary Residence	2,000 SF Primary Residence	3,000 SF Primary Residence	4,000 SF Primary Residence
State allowance of two 1,000 SF ADUs	2,000 SF of ADUs consisting of two (2) 1,000 SF ADUs			
City’s current 50 percent limitation	1,000 SF of ADUs consisting of two (2) 500 SF ADUs	2,000 SF of ADUs consisting of two (2) 1,000 SF ADUs	3,000 SF of ADUs consisting of two (2) 1,500 SF ADUs	4,000 SF of ADUs consisting of two (2) 2,000 SF ADUs
Which standard allows the larger ADU?	State (2,000 SF)	State and City have same allowance (2,000 SF)	City (3,000 SF)	City (4,000 SF)

Since the City’s 50 percent allowance was developed when only one ADU was permitted on a lot, it is recommended that a cap be placed on the size of accessory dwelling units to ensure that the ADUs remain incidental to the primary single family residence and maintain a size that is more in line with ADUs being an accessory use (versus a property having three full-size single family residences).³ Potential suggested caps include:

- 1,200 SF ADU;
- 1,400 SF ADU; or
- 1,600 SF per ADU.

Topic 1 Questions: Is a cap on ADU sizes acceptable to Planning Commission? If so, is one of the figures referenced above acceptable, or is an alternate size preferred? If so, what size is desired?

Topic 2 – Simple Fix to Existing Single-Family Zones to Accommodate Middle Housing

Note: *Topic 2 provides background information and context for Topic 3.*

General City Council Guidance for this Topic: Minimize impacts of Middle Housing on existing single family residential neighborhoods, while preserving residential land capacity.

When staff previously spoke with City Council and Planning Commission, it was discussed that dwelling units per acre would no longer be an allowed approach for regulating density in zones primarily designated for single family residential. Without the dwelling units per acre distinction, the differences among the existing four single-family zones (i.e. R-4.5, R-6.5, R-8, and WR-R-4-8) diminished greatly and so a single Neighborhood Residential zone was proposed. Taking a second look at this matter, it appears that there is a simple solution to address the requirements of HB 1110, which requires jurisdictions to allow 2 or 4 units/lot, while preserving the single-family density allowances in our existing single family zones. By amending the ‘dwelling units per acre’ limitation to ‘dwelling units or lots per acre’, and providing an exemption to the dwelling unit requirement for Middle Housing, the existing single family zone designations and method for calculating density can be preserved. This would result in both maintaining single family densities at current levels and residential land capacity. Some consolidation of zones is still proposed (as will be discussed in **Topic 2b**); however, to a lesser extent than was originally proposed.

³ The average single family home size in Washington state is 2,185 square feet as of 2022. Source: [The Median Home Size in Every U.S. State in 2022](#)

Below is an excerpt of our existing density provisions for single family zones (**Figure 2**), and a markup showing a simple amendment that would both preserve existing single family residential capacity and residential land capacity (**Figure 3**):

Existing Single Family Density Allowance

Figure 2	R-4.5	R-6.5	R-8	WR-R-4-8
Density: Dwelling unit/acre (6)	4.5 du/ac	6.5 du/ac	8 du/ac	4.5 du/ac
Maximum density: Dwelling units/acre (1)	-	-	-	8 du/ac

Proposed Single Family and Middle Housing Density Allowance

Figure 3	R-4.5	R-6.5	R-8	WR-R-4-8
Density: Dwelling units <u>or</u> lots/acre (6)	4.5 du <u>or</u> lots/ac	6.5 du <u>or</u> lots/ac	8 du <u>or</u> lots/ac	4.5 <u>du or</u> lots/ac
Maximum density: Dwelling units <u>or</u> lots/acre (1)	-	-	-	8 <u>du or</u> lots/ac
Single family residences per lot	1	1	1	1
Middle Housing Units per lot (when 2 units allowed per lot)	2	2	2	2
*Please note that the above example is for illustration purposes only. The particulars with respect to ADU allowances and Middle Housing of 4 units per lot within ¼ mile of a major transit stop and when affordable housing is provided will be built into the proposed code amendments.				

The concept of simply amending 'dwelling units per acre', to 'dwelling units or lots per acre' (with a unit per lot exception for Middle Housing) is illustrated in the Figures below. These figures show how the simple fix of amending 'dwelling units per acre' to 'dwelling units or lots per acre' both preserves single family densities and land capacity, while also ensuring compliance with HB 1110's Middle Housing requirements.

In these conceptual examples, 4 dwelling units per acre (**Figure 4**) or 4 lots per acre (**Figures 5 – 7**) is assumed. Each rectangle represents a lot, and the four rectangles add up to one acre.

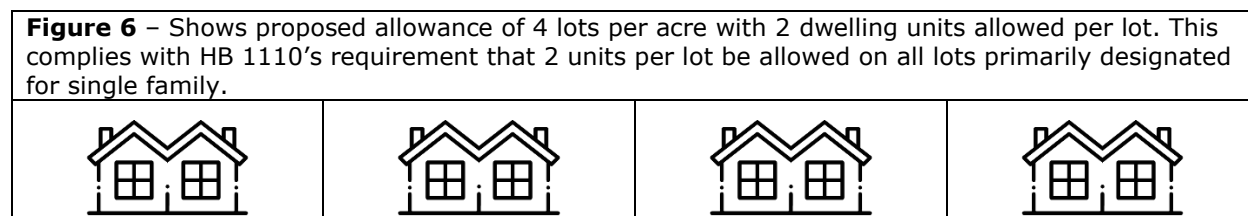
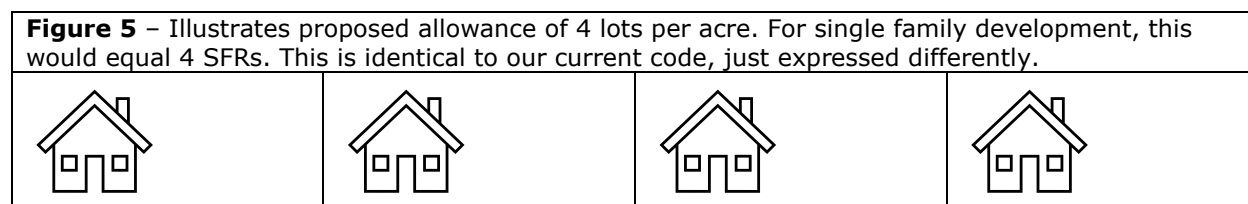
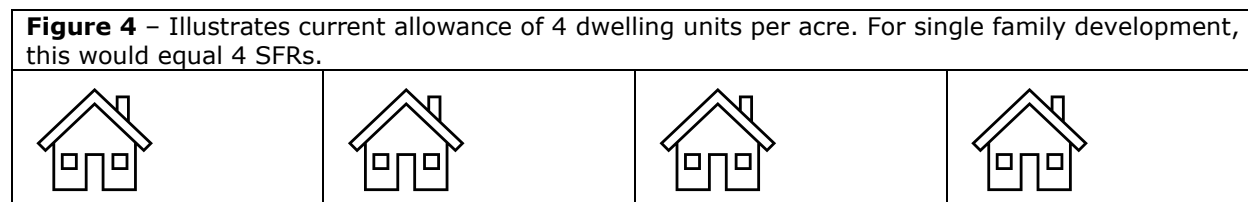
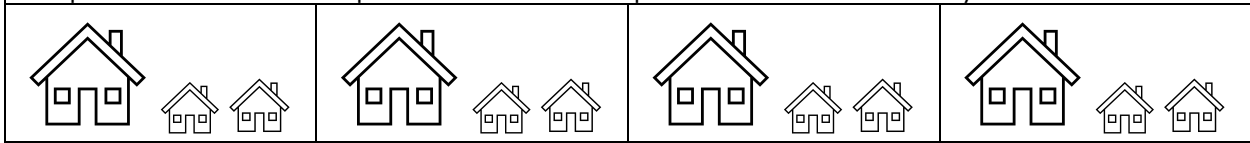


Figure 7 – Shows proposed allowance of 4 lots per acre with 1 SFR plus 2 ADUs per lot. This complies with HB 1337’s requirement that 2 ADUs per lot be allowed accessory to an SFR.



Topic 3 – Options for Amending Single-family Residential Zones while Accommodating Middle Housing

General City Council Guidance for this Topic: Minimize impacts of Middle Housing on existing single family residential neighborhoods, while preserving residential land capacity.

As noted in Topic 2 above, staff originally proposed consolidating the City’s four single family residential zones into a single Neighborhood Residential zone to address HB 1110. The proposal would have amended the City’s density methodology and had the minimum lot sizes determine the density yield. To maintain comparable levels of density, lot sizes would have increased a low to moderate amount to minimize the impacts of Middle Housing while maintaining the aggregate land capacity for all single family. However, consolidating the four single family zones into a single zone would have resulted in higher densities in traditionally R-4.5 areas, a very modest potential density increase in R-6.5 areas, and a very modest potential decrease in R-8 areas. Historically, the City’s R-4.5 zones have had the lowest density designation due to proximity to streams, wetlands floodplains, and/or geologically hazardous areas, and/or been in areas with existing lower density development, the absence of sewer, and/or access deficiencies.

Consolidation of the four single family zones into one zone is no longer recommended:

- 1) Due to the moderate density increases that would occur in the R-4.5 zone, where increased density is not always desirable; and
- 2) Existing levels of single family residential density being maintained by simply changing the allowance for the zones from ‘dwelling units per acre’ to ‘dwelling units or lots per acre’ with a dwelling unit exception for Middle Housing.

Retaining all four single family zones is also not recommended as it adds unnecessary complexity to the zoning code. In lieu of retaining all single family residential zones or consolidating all single-family zones into a single zone, two options for more modest consolidation are proposed as detailed below. Both approaches would preserve the City’s needed residential land capacity, while promoting zones that substantially preserve the status quo.

Topic 3 – Option 1: Consolidate Four Zones into Three Zones

This approach would consolidate the City’s R-6.5 and R-8 zones into a single zone that uses the current R-6.5 standards (with the exception that the density would be amended from ‘dwelling units per acre’ to ‘dwelling units or lots per acre’ (with a dwelling unit per lot exception for Middle Housing)) as shown in **Figure 8** below.

Figure 8	R-4.5	R-6.5	R-8	WR-R-4-8
Density: Dwelling units <u>or</u> lots/acre	4.5 du <u>or</u> lots/ac	6.5 du <u>or</u> lots/ac	8 du/ac	4.5 du <u>or</u> lots/ac
Maximum density: Dwelling units <u>or</u> lots/acre	-	-	-	8 du <u>or</u> lots/ac

Currently there are only two areas within the City that have the R-8 zoning. The properties that have both R-8 zoning and further development potential are shown in **Figure 9** below. It is estimated that these properties would have capacity for approximately 428 dwelling units. If consolidation with the R-6.5 zone occurs, there would instead be capacity for an estimated 263 dwelling units, which translates to 165 fewer dwelling units.

When considering this change, it is important to note the following:

- Most of the capacity that is still available in the R-8 zone applies to the Marysville School District and LDS properties, which may ultimately be developed for institutional uses (i.e. school, church). Land capacity was assigned to these properties as the properties may exceed these institutions' long-term needs resulting in the properties being sold. The City would still have adequate land capacity despite this change;
- These properties would also still be eligible for residential development standards (e.g. building and impervious coverage, setbacks, etc.) that are more flexible than the R-8 dimensional standards through the City's Planned Residential Development (PRD) code (which most new residential development uses); and
- The properties located at the northwest corner of 84th Street NE and Highway 9 may be a good potential candidate for rezoning to R-12 in the future given their proximity to arterials, schools, future commercial along 84th Street NE and existing commercial along 64th Street NE, and the ability to buffer from existing single family residential areas given the intervening roads and Getchell High School.

Figure 9 – Properties with R-8 Zoning and Future Development Potential		
Acreage	7.76 acres	45.74 acres
Estimated Dwelling Unit Capacity	62 dwelling units	366 dwelling units
Estimated Dwelling Unit Capacity with Zoning Change	38 dwelling units (-24 dwelling units)	225 dwelling units (-141 dwelling units)
Primary Ownership	Five different private households or individuals	Marysville School District, with LDS Church and a private entity.
Map Excerpt		

Topic 3 – Option 2: Consolidate Four Zones into Two Zones

This approach would consolidate the City’s R-6.5, R-8, and WR-R-4-8 zones into a single zone that uses the current R-6.5 standards (with the exception that the density would be amended from ‘dwelling units per acre’ to ‘dwelling units or lots per acre’ (with a dwelling unit per lot exception for Middle Housing) as shown in **Figure 10** below.

Figure 10	R-4.5	R-6.5	R-8	WR-R-4-8
Density: Dwelling units or lots/acre	4.5 du <u>or</u> lots/ac	6.5 du <u>or</u> lots/ac	8 du/ae	4.5 du/ae
Maximum density: Dwelling units or lots/acre	-	8 du <u>or</u> lots/acre	-	8 du/ae
*The maximum density is possible through the application of Residential Density Incentives when the Planned Residential Development standards are used.				

The same considerations (as detailed above) for consolidation of the R-6.5 and R-8 zones would apply.

Under current code, the WR-R-4-8 zone is a hybrid of the other three single family residential zones as shown in **Figure 11** below. The WR-R-4-8 zone allows a base density that is the same as the R-4.5 zone; a minimum lot size that is the same as the R-4.5 and R-6.5 zone; a maximum density that is nearly the same as the R-6.5 zone; and building and impervious surface allowances that are the same as the R-8 zone. The standards of the WR-R-4-8 zone that match another zone are highlighted in yellow. Setbacks are the same across all four zones.

Figure 11	WR-R-4-8	R-4.5	R-6.5	R-8
Base density	4.5 du/acre	4.5 du/acre	6.5 du/acre	8 du/acre
Maximum density in PRD with RDI	8 du/acre	5.4 du/acre	7.8 du/acre	9.6 du/acre
Minimum Lot Size	5,000 SF	5,000 SF	5,000 SF	4,000 SF
Building coverage	50%	40%	40%	50%
Impervious coverage	50 – 65%	45 – 50%	45 – 50%	50 – 65%

It should be noted that most residential development in the WR-R-4-8 zone uses the Planned Residential Development (PRD) process and pursues densities closer to the maximum, which results in lesser setbacks; a combined building and impervious surface coverage of 70 percent; and a 3,500 SF lot size. This means that the WR-R-4-8 zone has minimal differences with the R-6.5 zone. The WR-R-4-8 zone has also resulted in some confusion as certain standards in code seem to imply that the WR-R-4-8 zone is eligible for both the maximum 8 dwelling units per acre plus a 20 percent Residential Density Incentive (RDI) bonus applicable to PRDs in other zones, which is not the case. Consolidating the WR-R-4-8 zone with the R-6.5 zone would greatly simplify the code while not compromising land capacity. It would also result in the base allowance for the WR-R-4-8 zone becoming 6 ½ dwelling units per acre without the need for RDIs, which has a positive impact on housing affordability.

Below in **Figure 12** is a side-by-side comparison of key considerations for **Options 1 and 2**.

Figure 12	Option 1 – Four Zones Become Three	Option 2 – Four Zones Become Two
Zone(s) to be Consolidated (i.e. eliminated)	R-8	R-8 and WR-R-4-8
Anticipated Net Loss of Density	-165 units	-165 units

Extent that Code is Simplified	Small improvement	Moderate improvement
Impact on Size of Structures Constructed?	Size of structures on a standard subdivision lot would be smaller; however, larger structures are possible if a PRD is pursued (one-acre starting lot size needed).	Size of structures on a standard subdivision lot would be smaller; however, larger structures are possible if a PRD is pursued (one-acre starting lot size needed). Note: most subdivisions in the WR-R-4-8 zone are PRDs, so the impact is expected to be comparable to just eliminating one zone.
Residential Density Incentive (RDI) Considerations	<ul style="list-style-type: none"> · Modest reduction in allowance in R-8 should RDI be pursued. Those areas would allow for 8 units only rather than 9.6; however, R-8 areas are limited. · Preserves the requirement that RDI be pursued in the WR-R-4-8 zone to go from 4 ½ to 6 ½ dwelling units per acre as RDI would be required for any increase in density above 4 ½ units per acre. This means that different public benefits, sometimes monetary contributions to public improvements such as sidewalks), would be reduced proportionally. 	<ul style="list-style-type: none"> · Modest reduction in allowance in R-8 should RDI be pursued. Those areas would allow for 8 units only rather than 9.6; however, R-8 areas are limited. · Eliminates the need for RDI to go from 4 ½ to 6 ½ dwelling units per acre in the WR-R-4-8 zone as the new base density would be 6 ½ units per acre. While different RDI (i.e. public benefits, sometimes monetary contributions to public improvements such as sidewalks) would be reduced, it would likely promote housing affordability.

Topic 3 Question: Does the Planning Commission prefer Option 1 (consolidate R-8 into R-6.5), or Option 2 (consolidate R-8 and WR-R-4-8 into R-6.5)?

Topic 4 – Middle Housing Exemption Areas for Locational or Physical Constraints

General City Council Guidance for this Topic: Pursue up to a 25 percent exemption from the Middle Housing requirements of HB 1110 in appropriate areas. Consider access and rail constraints, and potentially inadequate parking and other factors.

HB 1110 (specifically [RCW 36.70A.635\(4\)](#)) permits a city to implement the unit per lot density requirements of RCW 36.70A.635(1) for “at least” 75 percent of lots in a city that are primarily dedicated to single-family detached housing units. Besides areas that are at higher risk of displacement under RCW 36.70A.070(2)(g), lots that must allow Middle Housing include:

- Any areas for which the exclusion would further racially disparate impacts or result in zoning with a discriminatory effect;
- Any areas within ½ mile walking distance of a major transit stop; and
- Any areas historically covered by a known racially restrictive covenant or deed restriction.

Potential criteria that could be used to exempt areas include:

- Access or road constraints such as:
 - A railroad crossing being the primary access to the area;
 - Substandard roads (e.g. narrow width, lack of sidewalk or walkable shoulder, etc.);
 - Inability to provide secondary access (typically a secondary access is required when 30 lots or units are proposed; this benchmark is supported by the Marysville Fire District);
 - Inadequate street parking; or
 - Documented speeding or safety hazards on a street.

- Presence or proximity to critical areas, floodplains, or geologically hazardous areas.
- Absence of sewer service or areas with water pressure issues.
- Areas with histories of flooding or water quality issues.
- Areas historically zoned R-4.5 zoning (lowest single family residential zoning). Note: not all R-4.5 areas could be excluded due to the large area of land currently zoned R-4.5.

Maps with different focus areas for exemption are attached (**Exhibit 1**) and will be explained at the Planning Commission work session. It should be noted that there is the potential to exclude more than 25 percent of land primarily dedicated to single family detached housing; however, that would require the Department of Commerce’s certification. Further discussion on this is provided in Section 6.0 (page 110/PDF page 111) of **Exhibit 2 [Middle Housing User Guide](#)**.

Topic 4 Questions:

- Which criteria should be used when determining the areas that should be exempted from Middle Housing requirements?
- Should certain discrete factors (e.g. inadequate access/rail constraints, displacement risk) always be excluded?
- Should priority be given to areas where multiple factors apply (i.e. inadequate access/rail constraints, displacement risk, potential geotechnical hazards, etc.)?
- Should exemption language be added in circumstances where deficiencies can be addressed (i.e. alternate access provided, water pressure addressed, etc.)?
- In areas with significant access/rail constraints, should duplexes and/or PRDs also be prohibited until access deficiencies are addressed?

Topic 5 – Preserving Land Capacity in the R-12 and WR-R-6-18 Multi-family Zones

General City Council Guidance for this Topic: City Council generally supports Planning Commission’s recommendation to remove single family from the R-18 and R-28 multi-family zones to preserve residential land capacity, and to ensure compatibility of uses.

Per prior discussion with Planning Commission and City Council, support was generally expressed for removing single family from the permitted uses from the R-18 and R-28 zones, which are the City’s highest density zones. This change is both to preserve the City’s residential land capacity and promote more compatible development (i.e. residential uses that are of a similar scale and density near each other, with lower density uses in lower density zones and higher density uses in higher density zones).

The City’s R-12 and WR-R-6-18 zones comprise 182.41 acres⁴ representing the potential for 2,012 dwelling units. From 2021 through the present, residential development in the WR-R-6-18 zone is about 20.6 percent less (i.e. 126 units) than projected, while residential development in the R-12 zone was about 14 percent more (i.e. 99 units) than projected as shown in attached **Exhibit 3**.⁵ If these trends continue, a shortfall of approximately 233 dwelling units would result in the WR-R-6-18 zone (Calculation: 1,130 dwelling units projected x 20.6 percent reduction = 233 units). Shortfalls in residential capacity will mean that rezoning or other measures will need to be pursued elsewhere to provide adequate residential capacity within the City.

⁴ Source: 2024 Marysville Comprehensive Plan [Appendix 2: Land and Housing Capacity Analysis](#) Figure 4. It should be noted that the developability of land is based on the [2021 Buildable Land Report](#), with minimal adjustments. Consequently, the actual capacity noted above is likely lower given development of some land with the R-12 and WR-R-6-18 designations would have occurred since 2021.

⁵ In Exhibit 3, three properties were assigned zero units in the Land Capacity Analysis. This is due to the properties not being considered developable due to being owned by government entities. When the previously government owned property in the R-12 zone is set aside, overall development is only up about 9.9 percent. In the R-28 zone, when the previously government owned property is set aside, development is only up about 3.6 percent, with all housing being multi-family or townhouse development.

Topic 5 Question:

To preserve land capacity in the R-12 and WR-R-6-18 zones, should one of the following strategies be pursued?

- Set a minimum density for the R-12 and WR-R-6-18 zones that is near the density level projected in the City’s Land Capacity Analysis; or
- Prohibit single family detached residences in the R-12 and WR-R-6-18 zones.

Topic 6 – Level of Density for Master Planned Senior Communities in Single Family Zone(s)

General City Council Guidance for this Topic: There was generally support for removing the Conditional Use Permit (CUP) requirement for Master Planned Senior Communities in multi-family zones, and for allowing the density for MPSC in the single-family zone(s) to be moderately incentivized.

At the May 5th City Council meeting, support was expressed for removing the Conditional Use Permit requirement for Master Planned Senior Communities in multi-family zones; this topic was previously discussed with Planning Commission as well and support was similarly expressed. Consistent with those discussions, the Conditional Use Permit requirement is proposed to be removed from most senior citizen housing uses in multi-family zones.

With respect to the allowed density for MPSC in the single-family zones, an alternate density approach was discussed with City Council when it was believed that our density methodology would need to differ from our historical methodology. **Figure 13** below shows the general density for the City’s single-family zones along with the maximum allowed density for MPSCs.

Figure 13	R-4.5	R-6.5	R-8	WR-R-4-8
Density: Dwelling units/acre	4.5 du/ac	6.5 du/ac	8 du/ac	4.5 du/ac
Current maximum density for MPSC: Dwelling units /acre	5.4 du/acre	7.8 du/acre	9.6 du/acre	5.4 du/ac
*The maximum density in MPSCs is 20 percent of the base density for the zone.				

Topic 6 Question:

Given that the City’s single family residential zones may be consolidated, and that City Council provided direction to modestly incentivize MPSC, the following density options are presented for consideration:

- Option 1 – Allow 6 or 8 du/acre for MPSC, depending on the zone
- Option 2 – Allow 8 or 10 du/acre for MPSC, depending on the zone
- Option 3 – Allow 10 or 12 du/acre for MPSC, depending on the zone

In each of these scenarios, a lower density would be proposed in the lower density residential zone(s) and the higher density would be proposed in the higher density residential zone(s).

Topic 7 – If Single Family Residences Continue to be Permitted in Multi-family Zones, Should a Height Increase for Single Family Residences and Duplexes be Allowed?

Currently single family detached residences and duplexes in the multi-family zones are subject to a 30-foot height limit, while multi-family and townhouses in the R-12 and WR-R-6-18 zones are subject to a 35-foot height limit and in the R-18 and R-28 zones are subject to a 45-foot height limit.

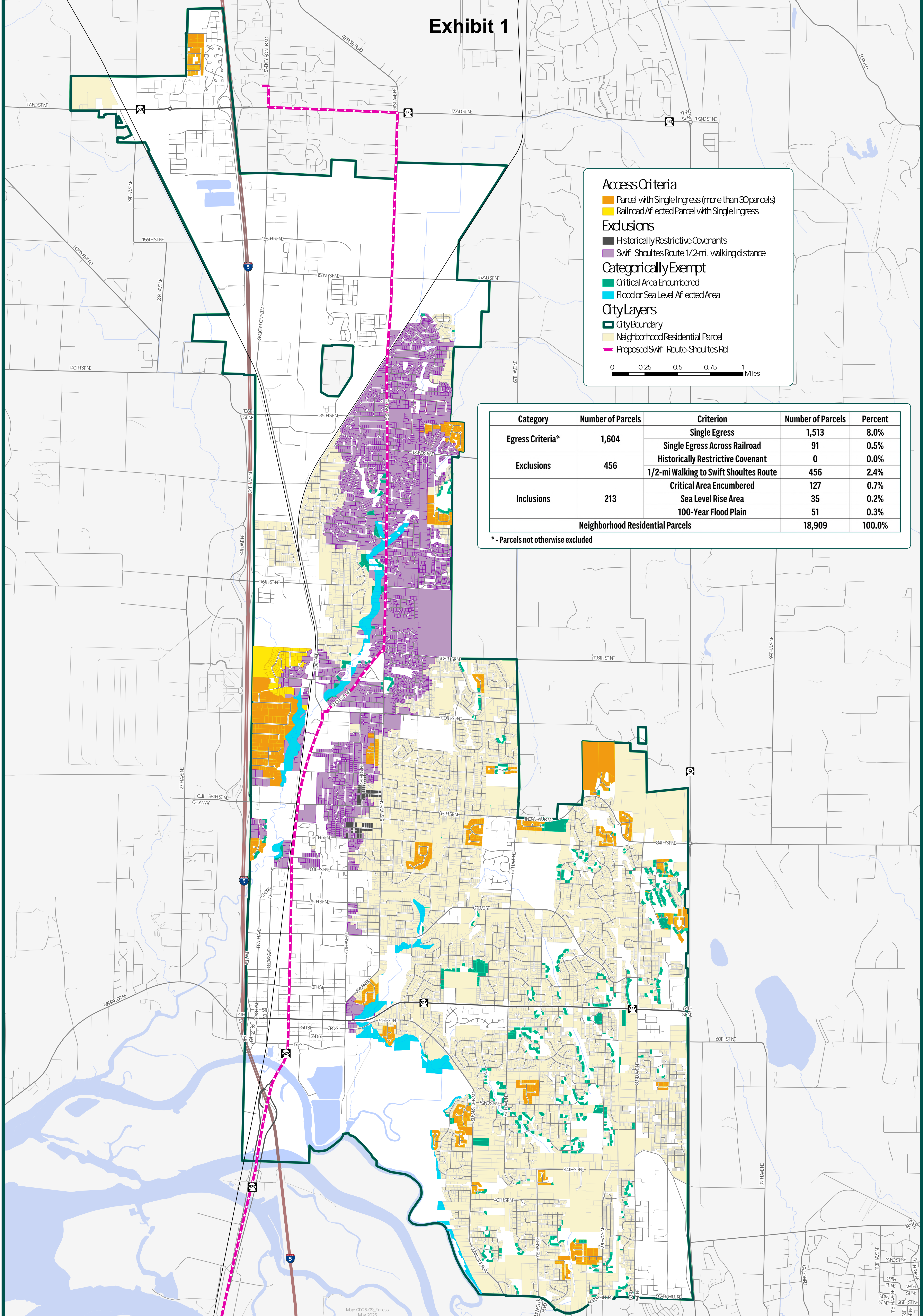
While single family detached is proposed to be removed from the R-18 and R-28 zones, and may be limited in the R-12 and WR-R-6-18 zones (depending on the direction provided by Planning Commission on Topic 5), to the extent these uses are retained, it would seem reasonable to allow single family and duplexes to be up to 35 feet tall. Provisions could be added to code to require that the residences step down in height to 30 feet or provide a greater setback along project perimeters adjacent to single family zones.

Topic 7 Questions:

- Should single family residences (to the extent they are retained) and duplexes in multi-family zones be allowed to be up to 35 feet tall?
- If so, should there be provisions to require the height to reduce to 30 feet or provide additional setbacks when abutting single family zones?

At the June 24th Planning Commission meeting, staff respectfully request direction on the topics provided above. Staff anticipates presenting the final regulations for consideration in July or potentially August (pending discussion with Planning Commission). A memo and Interim Ordinance on Middle Housing which will be presented to City Council on June 23rd is linked as [Exhibit 4](#) (items 12 – 14) for reference.

Exhibit 1



Access Criteria

- Parcel with Single Egress (more than 30 parcels)
- Railroad Affected Parcel with Single Egress

Exclusions

- Historically Restrictive Covenants
- Swift Shoultes Route 1/2-mi. walking distance

Categorically Exempt

- Critical Area Encumbered
- Flood or Sea Level Affected Area

City Layers

- City Boundary
- Neighborhood Residential Parcel
- Proposed Swift Route-Shoultes Rd.

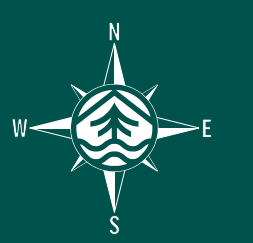
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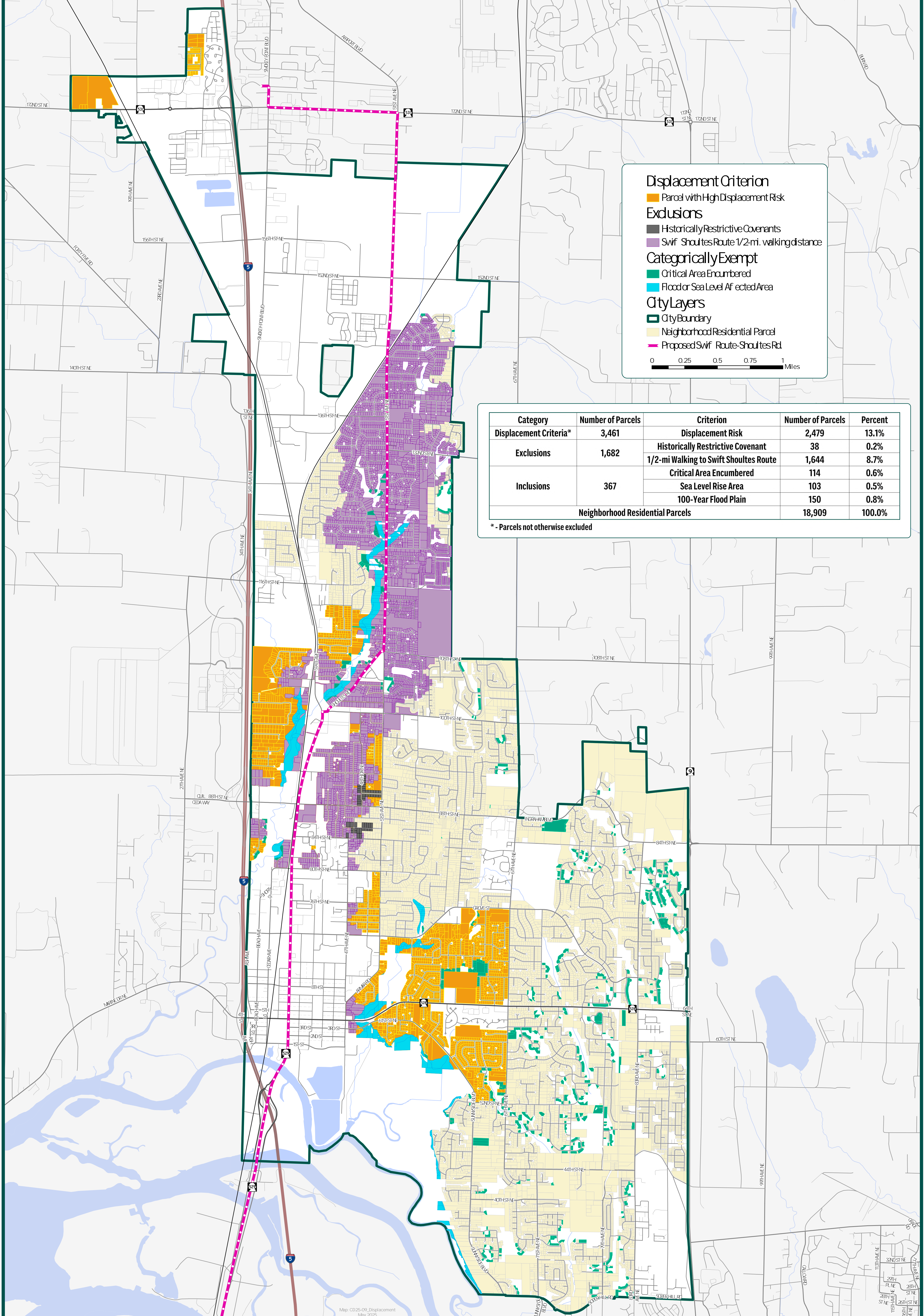
Category	Number of Parcels	Criterion	Number of Parcels	Percent
Egress Criteria*	1,604	Single Egress	1,513	8.0%
		Single Egress Across Railroad	91	0.5%
Exclusions	456	Historically Restrictive Covenant	0	0.0%
		1/2-mi Walking to Swift Shoultes Route	456	2.4%
Inclusions	213	Critical Area Encumbered	127	0.7%
		Sea Level Rise Area	35	0.2%
		100-Year Flood Plain	51	0.3%
Neighborhood Residential Parcels			18,909	100.0%

* - Parcels not otherwise excluded

Map: CD25-09_Egress
May 2025

MIDDLE HOUSING POTENTIAL EXEMPTION AREA ACCESS AND/OR RAILROAD CONSTRAINTS-SHOULTES ROUTE





Displacement Criterion
 Parcel with High Displacement Risk

Exclusions
 Historically Restrictive Covenants
 Swif Shoulttes Route 1/2-mi. walking distance

Categorically Exempt
 Critical Area Encumbered
 Flood or Sea Level Affected Area

City Layers
 City Boundary
 Neighborhood Residential Parcel
 Proposed Swif Route-Shoulttes Rd

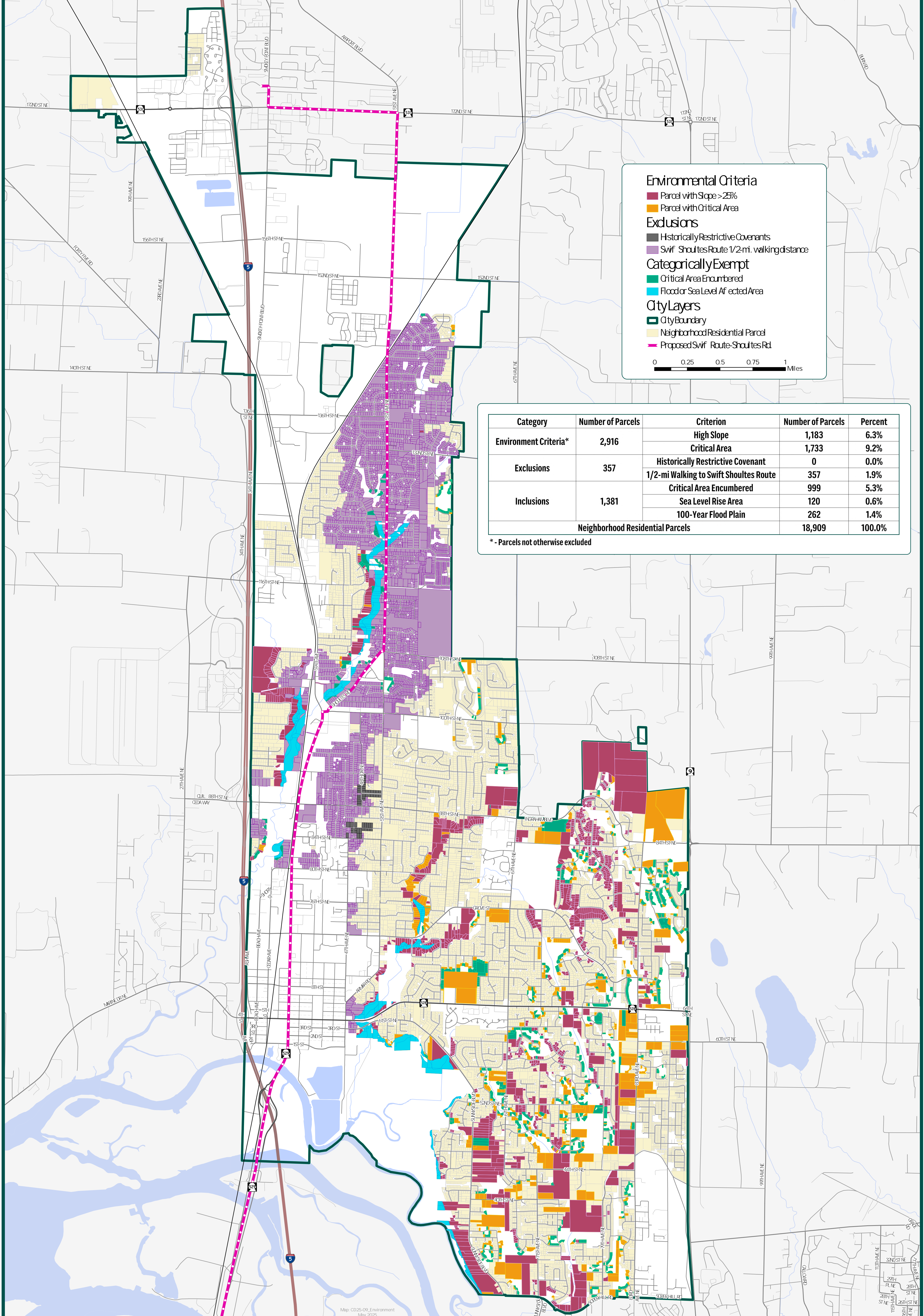
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Category	Number of Parcels	Criterion	Number of Parcels	Percent
Displacement Criteria*	3,461	Displacement Risk	2,479	13.1%
		Historically Restrictive Covenant	38	0.2%
Exclusions	1,682	1/2-mi Walking to Swift Shoulttes Route	1,644	8.7%
		Critical Area Encumbered	114	0.6%
Inclusions	367	Sea Level Rise Area	103	0.5%
		100-Year Flood Plain	150	0.8%
		Neighborhood Residential Parcels	18,909	100.0%

* - Parcels not otherwise excluded

Map: CD25-09_Displacement
 May 2025





Environmental Criteria

- Parcel with Slope > 25%
- Parcel with Critical Area

Exclusions

- Historically Restrictive Covenants
- Swif Shoulttes Route 1/2-mi. walking distance

Categorically Exempt

- Critical Area Encumbered
- Flood or Sea Level Affected Area

City Layers

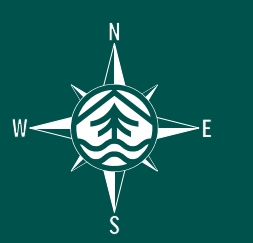
- City Boundary
- Neighborhood Residential Parcel
- Proposed Swif Route-Shoulttes Rd.

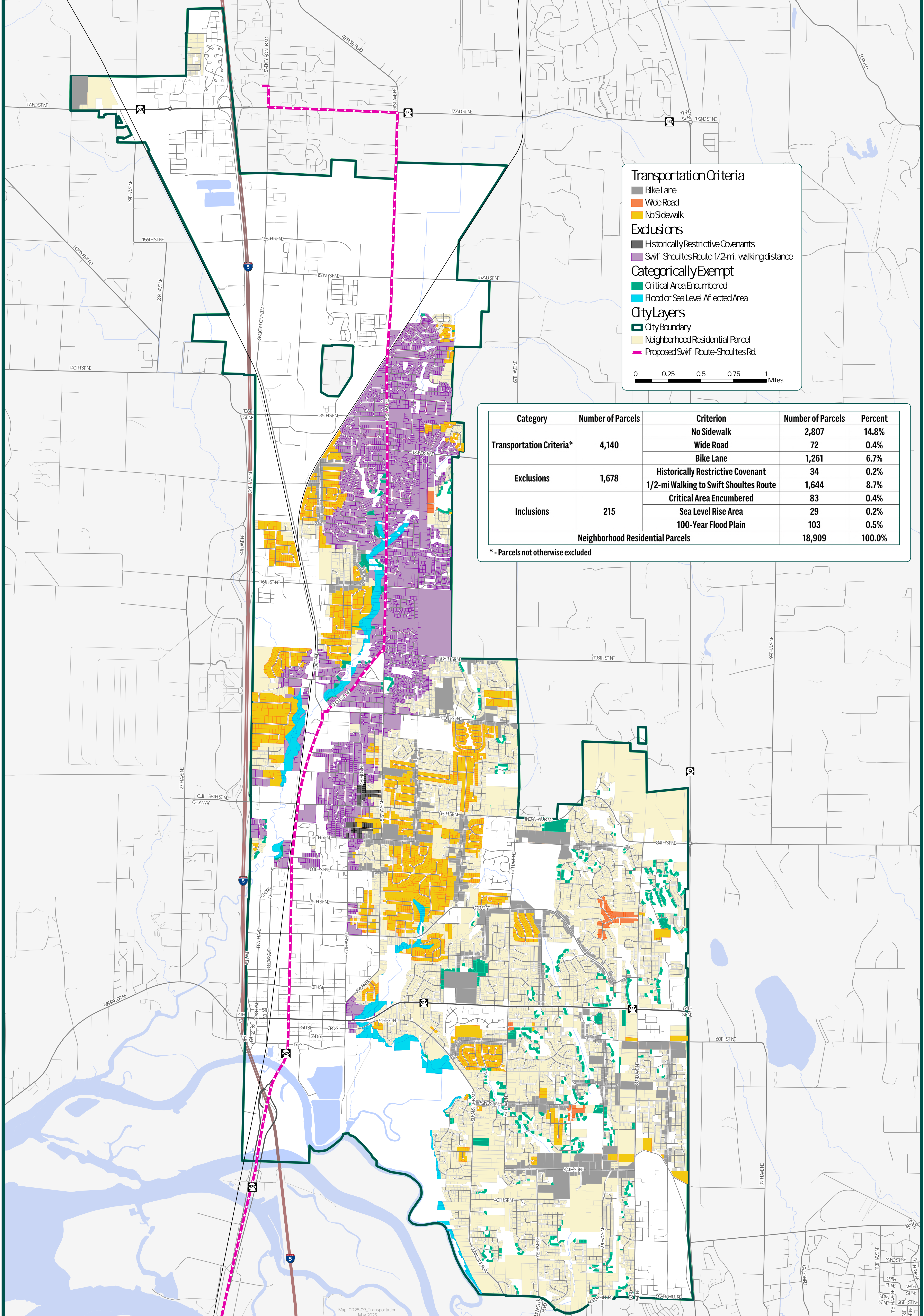
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Category	Number of Parcels	Criterion	Number of Parcels	Percent
Environment Criteria*	2,916	High Slope	1,183	6.3%
		Critical Area	1,733	9.2%
Exclusions	357	Historically Restrictive Covenant	0	0.0%
		1/2-mi Walking to Swift Shoulttes Route	357	1.9%
Inclusions	1,381	Critical Area Encumbered	999	5.3%
		Sea Level Rise Area	120	0.6%
		100-Year Flood Plain	262	1.4%
Neighborhood Residential Parcels			18,909	100.0%

* - Parcels not otherwise excluded

MARYSVILLE
 MIDDLE HOUSING POTENTIAL EXEMPTION AREA
 CRITICAL AREAS AND STEEP SLOPES - SHOULTES RD ALIGNMENT





Transportation Criteria

- Bike Lane
- Wide Road
- No Sidewalk

Exclusions

- Historically Restrictive Covenants
- Swif Shoulttes Route 1/2-mi. walking distance

Categorically Exempt

- Critical Area Encumbered
- Flood or Sea Level Affected Area

City Layers

- City Boundary
- Neighborhood Residential Parcel
- Proposed Swif Route-Shoulttes Rd.

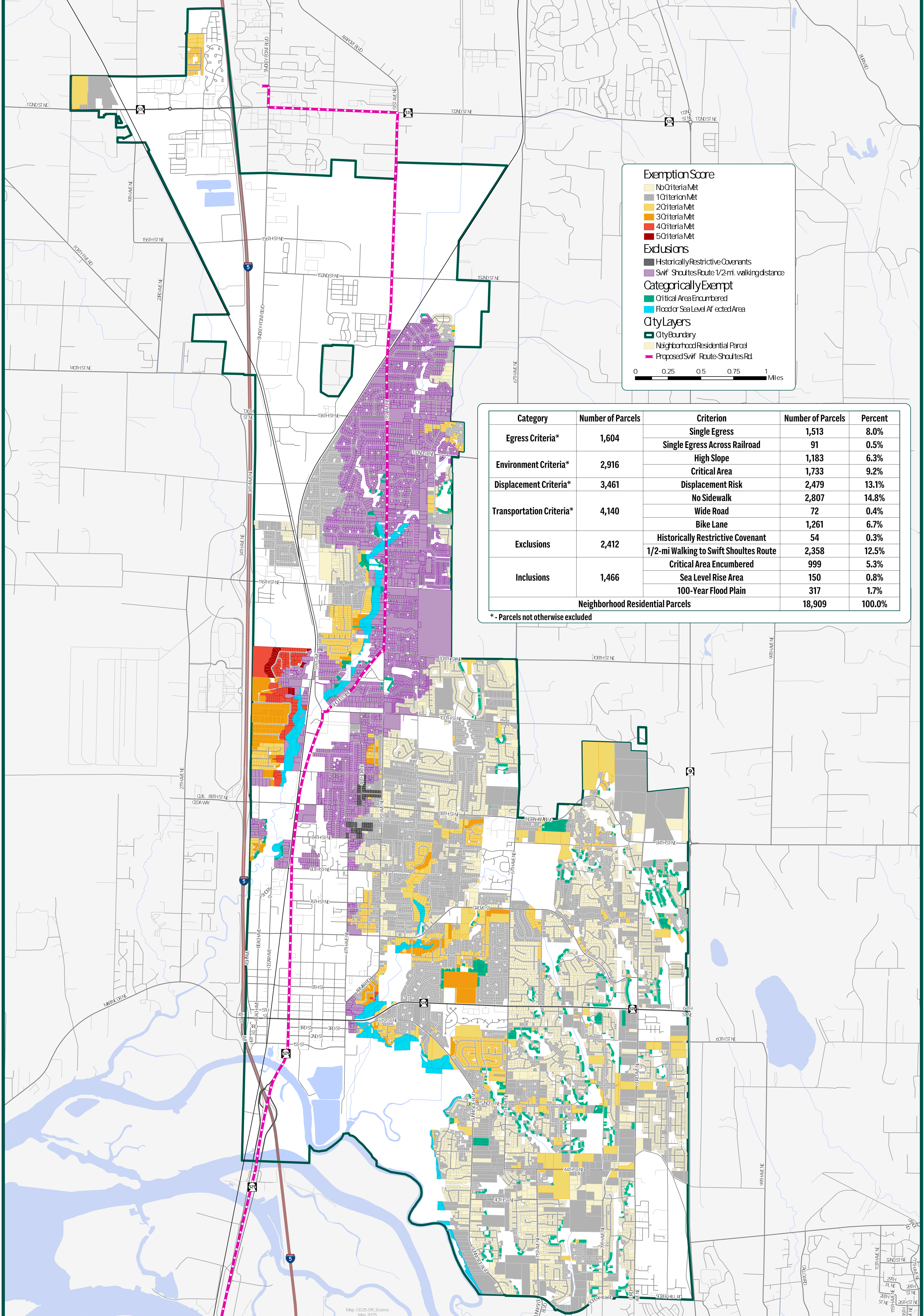
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Category	Number of Parcels	Criterion	Number of Parcels	Percent
Transportation Criteria*	4,140	No Sidewalk	2,807	14.8%
		Wide Road	72	0.4%
		Bike Lane	1,261	6.7%
Exclusions	1,678	Historically Restrictive Covenant	34	0.2%
		1/2-mi Walking to Swift Shoulttes Route	1,644	8.7%
Inclusions	215	Critical Area Encumbered	83	0.4%
		Sea Level Rise Area	29	0.2%
		100-Year Flood Plain	103	0.5%
Neighborhood Residential Parcels			18,909	100.0%

* - Parcels not otherwise excluded

Map: CD25-09_Transportation
May 2025

MIDDLE HOUSING POTENTIAL EXEMPTION AREA INADEQUATE STREET PARKING - SHOULTES RD ALIGNMENT



Exemption Score

- No Criteria Met
- 1 Criteria Met
- 2 Criteria Met
- 3 Criteria Met
- 4 Criteria Met
- 5 Criteria Met

Exclusions

- Historically Restrictive Covenants
- Swift Shoulters Route 1/2 mi. walking distance

Categorically Exempt

- Critical Area Encumbered
- Flood or Sea Level Affected Area

City Layers

- City Boundary
- Neighborhood Residential Parcel
- Proposed Swift Route-Shoulters Rd

0 0.25 0.5 0.75 1 Miles

Category	Number of Parcels	Criterion	Number of Parcels	Percent
Egress Criteria*	1,604	Single Egress	1,513	8.0%
		Single Egress Across Railroad	91	0.5%
Environment Criteria*	2,916	High Slope	1,183	6.3%
		Critical Area	1,733	9.2%
Displacement Criteria*	3,461	Displacement Risk	2,479	13.1%
		No Sidewalk	2,807	14.8%
Transportation Criteria*	4,140	Wide Road	72	0.4%
		Bike Lane	1,261	6.7%
		Historically Restrictive Covenant	54	0.3%
Exclusions	2,412	1/2-mi Walking to Swift Shoulters Route	2,358	12.5%
		Critical Area Encumbered	999	5.3%
Inclusions	1,466	Sea Level Rise Area	150	0.8%
		100-Year Flood Plain	317	1.7%
		Neighborhood Residential Parcels	18,909	100.0%

* - Parcels not otherwise excluded

Map: CD25-09_Scores
May 2025

