

**STAFF REPORT ON COMPREHENSIVE PLAN
LAND USE AMENDMENT APPLICATION
FILE NO. Z1000046 COMP**

I. SUMMARY OF REQUEST AND RECOMMENDATIONS:

DESCRIPTION OF PROPOSAL: This is an application by Avista Corporation for a proposed Comprehensive Plan Amendment. The proposed amendment is to the Land Use Plan Map of the City's Comprehensive Plan to change the Land Use of 12 properties, approximately 6 acres, from "Residential 15-30" and "Office" to "Light Industrial". If approved, the implementing zoning designation requested is LI (Light Industrial).

Note: Site Maps, department and agency comments, and citizen comment letters are attached to this report.

II. GENERAL INFORMATION:

- A. Owner/Applicant: Avista Corporation (owns 9 of the 12 parcels)
Attn: Robin Bekkedahl
PO Box 3727 MSC-21
Spokane, WA 99220-3727
(509) 495-8657
- B. Location of Proposal: The properties for the revised proposal are located at 1709 E. Upriver Dr., 1603, 1611, 1619, 1623, 1631 E. North Crescent Ave., 2018, 2022, 2220 N. North Center St., 2021, and 2029 N. Hamlin St., on parcel numbers 35093.1314, .0603, .0604, .0605, .0607, .0609, .0702, .0703, .0704, .0705, .0708, and .0709.
- C. Existing Zoning: O-35 and RMF
- D. Land Use Plan Designation: Office and Residential 15-30
- E. SEPA Status: A SEPA threshold Determination of Nonsignificance was issued on June 22, 2011. The appeal period will close on July 7, 2011.
- F. Enabling Zoning: SMC 17G.020, Comprehensive Plan Amendment Process
- G. Hearing Date: July 13, 2011 at 5:00 pm in the City Council Chambers
- H. Staff Contact: Tami Palmquist, 625-6157
tpalmquist@spokanecity.org

III. FINDINGS OF FACT:

- A. Site Description: The large parcel along Upriver Drive, zoned Office, is vacant of any structures and has a few remaining trees. The west end is currently being used as an unimproved overflow parking lot for Avista. A commercial parking lot is not an allowed use in the Office zone. The 11 parcels in the block surrounded by North Center Street, North Crescent Ave and Hamlin Street, are zoned Residential Multifamily and are being used as single family residential, multifamily residential and as a utility substation.
- B. Project Description: Authorized by Spokane Municipal Code Section 17G.020, “Comprehensive Plan Amendment Process,” the applicant is requesting a Comprehensive Plan Land Use Map designation change for 11 parcels from “Residential 15-30” to “Light Industrial” and for one parcel from “Office” to “Light Industrial” totaling approximately 6 acres. The implementing zoning designation requested is LI (Light Industrial).

Originally this proposal came in for 10 acres of land to be reclassified as Light Industrial, but because of neighborhood opposition Avista revised their application on March 8, 2011, removing the 20 properties in the center block, which were zoned RMF. This has appeared to appease the neighbors and they are no longer in opposition.

The original application described the request for change as follows:

Avista seeks a rezone of adjacent properties to the existing Avista main campus which is currently zoned as Light Industrial. The existing campus has been in operation at its current location since 1955. Avista has the need to expand its current operation to Avista owned property located across North Center Street. The proposed development of this adjacent property is needed for additional employee parking and covered canopy parking for large line trucks and other related equipment. The current land use designation for this property is O-35 (office).

- C. Surrounding Zoning and Comprehensive Plan Land Use Designations:
To the north and east: The properties are zoned RMF with a land use plan map designation of Residential 15-30.
To the northwest: The properties are zoned NR-35 with a land use plan map designation of Mini-Center.
To the west: The property is zoned LI with a land use plan map designation of Light Industrial.
To the south: The Spokane River is the Southern boundary. Across the river the properties are zoned RMF with a land use map designation of Residential 15-30.
- D. Zoning and Land Use Designation History:
The property was zoned Class 1 Residential from June 27, 1929 to June 4, 1958, and R4 through January 20, 1975. On June 24, 1986 the Hearing Examiner approved a Zone Change from R3-D to RO-1L. The subject property has since been zoned O-35 with the implementation of the Unified Development Code in 2005.

E. Adjacent Land Use:

To the north: BNSF Railroad tracks, and then Single Family homes beyond that.

To the east: Riverview Retirement Community, Multi-family uses.

To the south: The Spokane River and residential beyond.

To the west: Avista's main campus, including Office and Industrial Uses.

F. Applicable Regulations: SMC 17G.020, Comprehensive Plan Amendment Process; SMC 17G.020.010(C): Amendments: Timing, Criteria**G. Procedural Requirements:**

- Application was submitted on October 27, 2011;
- Applicant was provided Notice of Application on January 7, 2011;
- Notice of Application was posted, published and mailed on January 13, 2011, which began a 60 day public comment period;
- Applicant met with the Logan Neighborhood on March 15, 2011;
- A revised Notice of Application was posted on March 16, 2011, and mailed on March 11, 2009, which extended the public comment period to April 5, 2011;
- A SEPA Determination of Non Significance was issued on June 22, 2011;
- Notice of Public Hearing was posted on June 20, 2011, and mailed on June 15, 2011;
- Notice of Public Hearing will be published in the Spokesman Review on June 22, 2011 and June 29, 2011;
- Notice of Public Hearing will be published in the Official City Gazette on June 22, 2011 and June 29, 2011;
- Hearing Date is scheduled for July 13, 2011, in Council Chambers.

IV. DEPARTMENT REPORTS

Notice of this proposal was sent to City departments and outside agencies for their review on November 17, 2011.

The Department of Engineering Services Traffic Engineering Section made the comment that *“Conditions of approval if the Comp Plan Amendment is approved may include parking shielding from adjacent residential uses, commercial driveway access prohibited into residential areas, noise, glare, odor abatement, or other measures as necessary. Lighting shall be confined to the site, and clear views at intersections and driveways will be maintained.”* While we cannot condition a Comprehensive Plan Amendment note that these are also requirements of the Spokane Municipal Code and will be enforced with subsequent development of a project on these sites.

V. CONCLUSIONS**Decision Criteria—SMC 17G.020.010(C)**

SMC 17G.020.010C specifies the decision criteria for comprehensive plan amendments. For amendments, it states the following:

SMC 17G.020.010C. Amendments: Timing, Criteria

Starting in 2003, and thereafter no more often than once a year, the plan commission may recommend and the city council may adopt amendments to the land use plan map, or the text of the comprehensive plan or land use code, upon finding that each proposal meets all of following conditions and requirements. However, proposals that are not consistent with the comprehensive plan are addressed only within the context of the required comprehensive plan update cycle every seven years pursuant to RCW 36.70A.130(4)(c) and every other year starting in 2005.

Criterion 1. GMA: The change must be consistent with the goals and purposes of the state Growth Management Act.

Relevant facts:

The “Legislative findings” included in the Revised Code of Washington pertaining to GMA is essentially a call for coordinated and planned growth that is done cooperatively between citizens, government, and the private sector. The complete text of the “Legislative findings” follows:

RCW 36.70A.010, Legislative findings.

The legislature finds that uncoordinated and unplanned growth, together with a lack of common goals expressing the public's interest in the conservation and the wise use of our lands, pose a threat to the environment, sustainable economic development, and the health, safety, and high quality of life enjoyed by residents of this state. It is in the public interest that citizens, communities, local governments, and the private sector cooperate and coordinate with one another in comprehensive land use planning.

The Growth Management Act contains 13 goals to guide the development and adoption of the comprehensive plans and development regulations (RCW 36.70A.020, “Planning Goals”). The revised proposal is consistent with these goals.

Staff concludes that this criterion is met.

Criterion 2. Consistency: Unless the proposal is consistent with and implements the current version of the comprehensive plan and its supporting documents, adoption of the proposal must also include any other changes needed to regain overall compliance with GMA’s requirement for internal and regional consistency.

Relevant facts:

The applicant is proposing a Light Industrial land use designation on 12 parcels, one located on Upriver Dr. and Ross Ct., between North Center St. and Granite St.; and 11 parcels along North Center St., North Crescent Ave., and Hamlin St.

Comprehensive Plan Policy LU 1.10 “Industry”

Provide a variety of industrial locations and site sizes for a variety of industrial development and safeguard them from competing land uses.

Discussion: Planned industrial locations should be free from critical areas, not subject to conflicting adjacent land uses, readily accessible to adequate transportation, utility, and service systems, and convenient to the labor force.

Commercial and office uses have historically been permitted in most areas that are designated for industrial use. Continuation of this practice may lead to the displacement of the vital industrial lands needed for the economic vitality of the city. The industrial lands inventory in the city and the urban growth area should be evaluated to determine which industrial lands should be preserved for exclusive industrial use and which areas should continue to allow commercial use.

In most cases, residential use is not appropriate in the industrial designation because of off-site impacts generated by industrial uses and the lack of residential amenities in these areas. However, river-oriented residential uses are allowed in areas along the Spokane River where residents can take advantage of the river amenity. Residential uses should be carefully designed to be compatible with industrial uses. This compatibility may be maintained by using slope to other means or separate uses, and through buffers, landscaping, setbacks, fencing or other appropriate measures. The intent is to avoid conflicts between residential and industrial uses permitted in these areas.

The policy states that the industry is to be protected from the competing uses of commercial and office intrusion. The policy also discusses avoidance of conflict between residential and industrial uses due to off site impacts created by the industrial use. Some of these impacts can be softened with landscaping, screening, and frontage improvements, which are required to be constructed at the time of development by the Unified Development Code.

3.5 Description of Land Use Designations

Light Industrial: This designation is intended for those lighter industrial uses, which produce little noise, odor, or smoke. River-oriented residential uses are permitted in the light industrial designation.

The industrial zoning category implements the industrial goals and policies and land use plan map designations of the comprehensive plan. The light industrial zone is intended to provide a wide range of employment opportunities without potential conflicts from interspersed residential uses. Consistent with the comprehensive plan, residential development is allowed in close proximity to the Spokane River where residents can take advantage of the river amenity. Limits on the intensity of uses and their impacts on surrounding land uses are accomplished by the development standards specified in SMC 17C.130. The development standards are designed to allow a large degree of development flexibility within parameters that support the intent of the specific zone. The standards are intended to provide certainty to property owners, developers and neighbors about the limits of what is allowed in the industrial zones, while still being able to assure safe, efficient and environmentally sound development, which will have minimum adverse impacts.

The Applicant's offers the following response:

The fundamental concepts of a comprehensive plan are to plan for growth in an orderly manner that maintains a balance between the environment, economics, safety, and general welfare of the public good. The proposed comprehensive plan and zone change is within an existing and developed area with the Avista Service Center Campus and Corporate Headquarters, Electrical Substation, and Riverview Retirement Community. There are a few areas of residential development intermixed within the requested proposal.

The Avista Service Center/Campus has helped to sustain the region with benefits both economically, environmentally, and socially for over 50 years. By allowing the

comprehensive plan and zone change there will be no negative impacts to the environment, neighborhood, or to the public. The Avista Corporate headquarters is currently zoned Light Industrial. In December of 1979 the Ross Park substation located at 2021 N. Hamlin St. was approved and construction began. Over time this area has developed in a land use more conducive to Light Industrial without impacting adjoining properties. Allowing the approval of the comprehensive plan and zone change will beautify and benefit the immediate area and continue the existing partnership Avista has developed with the neighborhood and community. This request is a natural extension of the Avista campus and compatible with the surrounding environment.

The proposed comprehensive plan and zone change will not impact any of the residences ability to maintain and keep their property as residential due to Section 17C.130.110 Limited Use Standards.

Staff concludes that the application is generally consistent with goals and policies adopted in the Comprehensive Plan and that this criterion has been met.

Criterion 3. Cumulative Effect: All amendments must be considered concurrently in order to evaluate their cumulative effects.

Relevant facts:

This proposal is a land use designation change for a site of approximately 6 acres, consisting of one Office parcel and 11 Multi-family parcels. No other land use designations in the city would be changed or potentially changed by this proposal at this time. Thus, there would be no cumulative land use impacts related to this proposal.

Staff concludes that this criterion is met.

Criterion 4. SEPA: SEPA review must be completed on all amendment proposals.

Relevant facts:

The application has been reviewed in accordance with the State Environmental Policy Act (SEPA) that requires that the potential for adverse environmental impacts resulting from a proposal be evaluated during the decision-making process. On the basis of information contained with the environmental checklist, the written comments from local and State departments and agencies concerned with land development within the city, and a review of other information available to the Director of Planning Services, a Determination of Nonsignificance (DNS) was issued on June 22, 2011.

Staff concludes that this criterion is met.

Criterion 5. Adequate Public Facilities: The amendment must not adversely affect the City's ability to provide the full range of urban public facilities and services.

Relevant facts:

This application was routed to public facility and utility departments and agencies and the only department that has concerns was Engineering Services because of possible transportation impacts. Engineering Services recommended a Transportation Impact Analysis (TIA) and that was made a requirement of this application. Engineering Services comment is mentioned above under Department Reports. Staff has determined that this amendment will not adversely affect the City's ability to provide public facilities and services.

Staff concludes that this criterion is met.

Criterion 6. Public Benefit: The proposed changes will result in a net benefit to the general public.Relevant facts:

Policy ED 2.1 "Land Supply"

Ensure opportunities for locating a variety of desirable, livable wage industries in Spokane that are environmentally compatible with adjacent land uses and support a range of employment types.

Policy ED 3.1 "Economic Growth"

Stimulate economic growth by supporting the formation, retention, expansion, and recruitment of businesses.

Discussion: Land is a basic requirement for commercial and industrial activity. The City of Spokane encourages economic growth in locations suited for those uses based upon available public facilities, land capability, neighboring uses, and an orderly development pattern. These areas are identified in Chapter 3, Land Use.

To ensure that the economy can reasonably be sustained over the next 20 years, an adequate supply and variety of land must be available to attract new employers and to allow existing businesses to expand. To ensure environmentally compatible economic activity, the city should explore the possibility of conducting State Environmental Policy Act (SEPA) Planned Action(s) for potential development sites to facilitate desired economic growth. Preplanning for specific areas of industrial and commercial development or employment centers allows the city to target funds for infrastructure improvements. In addition, prospective investors and businesses recognize a commitment to planned growth and economic development and the predictability they add.

Providing for a diverse economy will help with the overall stabilization of the economy. Allowing the expansion of an industry is one way to help keep the economy diversified, as long as the use is environmentally compatible with adjacent land uses. Approval of this application and implementation of the trucking operation in a way that is in compliance with the zoning code will result in additional investment in the property and in the public frontage along that property. If the proposed Comprehensive Plan amendment and associated zoning change is approved and in order to "legalize" the use of the property as a trucking operation, improvements including landscaping, screening, paving, drainage swales, and street improvements will be required to be made.

Staff concludes that this criterion is met.

Criterion 7. No Adverse Effect: The proposed changes will not have a significant adverse effect on the public.

Relevant facts:

As stated previously under Criterion 4, this application was reviewed in accordance with the State Environmental Policy Act (SEPA) and a Determination of Nonsignificance (DNS) was issued on June 22, 2011.

Staff concludes that this criterion is met.

Review Criteria

SMC 17G.020.010 D. Amendments: Review Guidelines

The following is a list of considerations that shall be used, as appropriate, by the applicant in developing an amendment proposal, by planning staff in analyzing a proposal, and by the plan commission and city council in determining whether a criterion for approval has been met.

1. Regulatory Changes: Amendments to the comprehensive plan must be consistent with any recent state or federal legislative actions, or changes to state or federal regulations, such as changes to the Growth Management, or new environmental regulations.

Relevant facts: To the best of their knowledge, staff concludes that this amendment proposal is consistent with the above mentioned review guidelines.

2. Financing: In keeping with the GMA's requirement for plans to be supported by financing commitments, infrastructure implications of approved comprehensive plan amendments must be reflected in the relevant Six Year Capital Improvement Plan(s) approved in the same budget cycle.

Relevant facts: Since this amendment affects 12 parcels, which would be improved to City Standards by the applicant or developer over time, it is not anticipated that projects will need to be added to Six Year Capital Improvement Plans to address impacts associated with use of the property.

3. Funding Shortfall: If funding shortfalls suggest the need to scale back on land use objectives and/or service level standards, those decisions must be made with public input as part of this process for amending the comprehensive plan and Capital Facilities Program.

Relevant facts: Staff has concluded that this proposal will not have funding shortfall implications.

4. Internal Consistency: The requirement for internal consistency pertains to the comprehensive plan as it relates to all of its supporting documents, such as the development regulations, Capital Facilities Program, Shoreline Master Program, Downtown Plan, critical area regulations, and any neighborhood planning documents adopted after 2001. In addition, amendments should strive to be consistent with the Parks Plan, and vice versa. For example, changes to the development regulations must be reflected in consistent adjustments to the goals or policies in the comprehensive plan. As appropriate, changes to the map or text of the comprehensive plan must also result in corresponding adjustments to the zoning map and implementation regulations

in the Spokane Municipal Code.

Relevant facts: If approved, this amendment would result in an automatic zone change from RMF and O-35 to LI to be consistent with the Comprehensive Plan Land Use Map change. Staff anticipates minor inconsistency issues with the land use pattern, a Light Industrial Use facing (across the street from) a Residential Multi-Family Use. The inconsistency will be addressed through screening, landscaping, road frontage improvements, and by bringing each site into conformance with all requirements of the Spokane Municipal Code at the time a project is proposed.

5. Regional Consistency: All changes to the comprehensive plan must be consistent with the Countywide Planning Policies (CWPP), the comprehensive plans of neighboring jurisdictions, applicable capital facilities or special district plans, the regional Transportation Improvement Plan, and official population growth forecasts.

Relevant facts: The Applicant's offers the following response:

This application/proposal is consistent with the goals and policies of state and federal legislation. The Washington State Growth Management Act (GMA) is state legislation that plans for growth within urban areas and thereby preventing sprawl and the CWPPPs are the land use polices that guide growth in Spokane County. Typically capital facilities and infrastructure are accessible in these perimeters and growth is encouraged to develop in urban areas or close to urban areas thereby protecting other critical areas and agricultural lands. The GMA and CWPPPs also supports that comprehensive plans provide sufficient land capacity for development.

This application/proposal meets the purpose and intent of the GMA and the CWPPPs. If approved, Avista can stay within the City, where current services, including electric, natural gas, water, sewer, refuse pick up, telephone and other infrastructure exists. Planning development for the natural extension of the Avista service center operations is economically and financially prudent for the City and Avista. There are current regulations that protect the shoreline and critical areas and any development that occurs on the vacant property if the zone change is approved will need to comply with those regulations during the permitting process.

By approving the land designation to be changed to Light Industrial allows for "in-fill" of the vacant properties. This area has a developed street system from North Crescent Drive and Upriver Drive, as well as a developed recreational trail known as the Centennial Trail. Approving a zone change of the properties listed within the application allows for a contiguous, orderly growth that will not impact the area but allows Avista to operate the existing service center in a manner that meets the federal, state, and local regulations.

The CWPPP clearly states that "Jurisdictions should first encourage new development in areas where all urban governmental services and public facilities currently exist and secondly encourage new development in areas where all urban governmental services and public facilities can be provided economically".

To the best of their knowledge, staff concludes that this amendment proposal is consistent with the above mentioned review guidelines.

6. Consistent Amendments:

a. Policy Adjustments: Proposed policy adjustments that are intended to be consistent with the comprehensive plan should be designed to provide correction or additional guidance so the community's original visions and values can better be achieved. The need for this type of adjustment might be supported by findings from feedback instruments related to monitoring and evaluating the implementation of the comprehensive plan. Examples of such findings could include:

- i. Growth and development as envisioned in the plan is occurring faster, slower or is failing to materialize;
- ii. The capacity to provide adequate services is diminished or increased;
- iii. Land availability to meet demand is reduced;
- iv. Population or employment growth is significantly different than the plan's assumptions;
- v. Plan objectives are not being met as specified;
- vi. The effect of the plan on land values and affordable housing is contrary to plan goals;
- vii. Transportation and/or other capital improvements are not being made as expected;
- viii. A question of consistency exists between the comprehensive plan and its elements and Chapter 36.70A RCW, the Countywide Planning Policies, or development regulations.

Relevant facts: This proposal is a request for a Comprehensive Plan Land Use Plan Map amendment, not a policy adjustment. Staff concludes that this criterion is not applicable to this proposal.

b. Map Changes: Changes to the land use plan map (and by extension, the zoning map) may only be approved if the proponent has demonstrated that all of the following are true:

- i. The designation is in conformance with the appropriate location criteria identified in the comprehensive plan (e.g., compatibility with neighboring land uses, proximity to arterials, etc.);

Relevant facts:

Policy LU 1.10 "Industry", mentioned in Criteria #2 above.

Section 3.5 Description of Land Use Designations, mentioned in Criteria #2 above.

Staff concludes that this proposed amendment is consistent with the appropriate location criteria identified in the Comprehensive Plan.

- ii. The map amendment or site is suitable for the proposed designation;

This large site on Ross Ct and upriver Drive unimproved and lends itself to a natural expansion of Avista's campus. In 2007, Avista applied for and received approval for a Shoreline Conditional Use Permit to build an office building and associated parking lot on the site. Since that time they do not have as great of need for additional office as they do for additional parking for staff and fleet vehicles. A requirement for any subsequent development would be landscaping and screening from adjacent residential uses.

iii. The map amendment implements applicable comprehensive plan policies better than the current map designation.

In most cases elsewhere in the city where there is an interface between lower intensity land use plan map designations and higher intensity land use designations, that interface occurs along the rear property lines. In this case, approval of the application will result in a Light Industrial designation facing a Residential 15-30 designation along a front property line. There are no policies related to avoiding the creation of such interfaces between differing land use plan map designations. Improvements required by the Spokane Municipal Code will adequately address these impacts.

Staff concludes that the proposed land use, with proper improvements at time of development, will implement the comprehensive plan policies.

7. Inconsistent Amendments.

a. Review Cycle.

Because of the length of time required for staff review, public comment, and plan commission's in-depth analysis of the applicant's extensive supporting data and long-term trend analysis, proposals that are not consistent with the comprehensive plan are addressed only within the context of the required comprehensive plan update cycle every seven years pursuant to RCW 36.70A.130(4)(c) and every other year starting in 2005.

Relevant facts: Staff concludes that this amendment is generally consistent with the Comprehensive Plan. There are no policies in the Comprehensive Plan that discourages front yard interfaces between Residential 15-30 and LI land use plan map designations. This criterion has been met.

b. Adequate Documentation of Need for Change.

The burden of proof rests entirely with the applicant to provide convincing evidence that community values, priorities, needs and trends have changed sufficiently to justify a fundamental shift in the Comprehensive Plan. Results from various measurement systems should be used to demonstrate or document the need to depart from the current version of the comprehensive plan. Relevant information may include:

- i. growth and development as envisioned in the plan is occurring faster, slower or is failing to materialize;
- ii. the capacity to provide adequate services is diminished or increased;
- iii. land availability to meet demand is reduced;

- iv. population or employment growth is significantly different than the plan's assumptions;
- v. transportation and/or other capital improvements are not being made as expected;
- vi. conditions have changed substantially in the area within which the subject property lies and/or Citywide;
- vii. assumptions upon which the plan is based are found to be invalid; or
- viii. sufficient change or lack of change in circumstances dictates the need for such consideration.

Relevant facts: This proposal does not represent a fundamental shift in the direction of the Comprehensive Plan and does not require the level of scrutiny called for in this criterion.

c. Overall Consistency.

If significantly inconsistent with the current version of the comprehensive plan, an amendment proposal must also include wording that would realign the relevant parts of the comprehensive plan and its other supporting documents with the full range of changes implied by the proposal.

Relevant facts: As this application is specific to a land use plan map change, direct policy revisions were not deemed necessary for this application.

Staff concludes that this criterion is met.

8. Cumulative Effect.

All amendments must be considered concurrently in order to evaluate their cumulative effect on the comprehensive plan text and map, development regulations, capital facilities program, neighborhood planning documents, adopted environmental policies and other relevant implementation measures.

a. Land Use Impacts.

In addition, applications should be reviewed for their cumulative land use impacts. Where adverse environmental impacts are identified, mitigation requirements may be imposed as a part of the approval action.

Relevant facts: A DNS was issued on June 22, 2011. This application was for a Non Project SEPA review and there will be project specific Environmental Review done at time of development. Specific project based on-site and off-site impacts will be addressed at that time.

b. Grouping.

Proposals for area-wide rezones and/or site-specific land use plan map amendments may be evaluated by geographic sector and/or land use type in order to facilitate the assessment of their cumulative impacts.

Relevant facts: This is the only land use plan map amendment in this area of the city. It involves approximately 6 acres in size. There is not a need to evaluate cumulative impacts to the City because of the nature of the proposal. Five of the

original nine amendment applications from 2010 are being moved forward to City Council at the same time.

9. SEPA.

SEPA review must be completed on all amendment proposals.

a. Grouping.

When possible, the SEPA review process should be combined for related land use types or affected geographic sectors in order to better evaluate the proposals' cumulative impacts. This combined review process results in a single threshold determination for those related proposals.

Relevant facts: There were no other application in this immediate vicinity that would have changed the threshold determination of this proposal.

b. DS.

If a Determination of Significance (DS) is made regarding any proposal, that application will be deferred for further consideration until the next applicable review cycle in order to allow adequate time for generating and processing the required Environmental Impact Statement (EIS).

Relevant facts: Staff concludes that this criterion is not applicable to this proposal.

10. Adequate Public Facilities.

The amendment must not adversely affect the City's ability to provide the full range of urban public facilities and services (as described in CFU 2.1 and CFU 2.2) Citywide at the planned level of service, or consume public resources otherwise needed to support comprehensive plan implementation strategies.

Relevant facts: This application was routed to departments and agencies and was approved concurrency for public facilities and services. It is unlikely that it will have an adverse impact on the City's ability to provide public facilities and services.

11. UGA.

Privately initiated comprehensive plan amendment applications proposing changes to the urban growth area (UGA) will only be accepted during those years when the board of county commissioners (BoCC) reviews all UGAs countywide. Urban growth boundaries will be revised at least once every five years, per CWPP 1.19. Since the BoCC is the sole agency authorized to change the UGA, the city council's role is merely to review those suggested changes and make recommendations to the BoCC. A review of densities and population growth trends must indicate that such a change is needed, and the review shall conform to the requirements and guidelines contained in chapter 36.70A RCW and the relevant countywide planning policies.

Relevant facts: Staff concludes that this criterion is not applicable to this proposal.

VI. RECOMMENDATIONS

STAFF CONCLUSION: Staff recommends that this Comprehensive Plan Land Use Map Amendment request to change the land use designation of one parcel from "Office" to "Light Industrial" and 11 parcels from "Residential 15-30" to "Light Industrial", with an implementing zoning designation of "Light Industrial", be approved.