

Lara Thomas

From: Michael Hubner <MHubner@psrc.org>
Sent: Tuesday, March 29, 2016 1:44 PM
To: Lara Thomas
Subject: RE: City of Duvall - Comprehensive Plan Review (email 1)

Lara,

We are in the process of reviewing the plan and preparing comments. Apologies for the delay.

Before we send something, however, I'd like to talk with you over the phone about how the draft plan relates to growth targets, forecasts, and capacity. I also want to get a clearer picture of how the UGA and UGAR areas play into the future growth picture.

Do you have any time this afternoon? If not, tomorrow?

Regards,
Michael

Michael Hubner, AICP

Principal Planner | Puget Sound Regional Council
1011 Western Ave., Suite 500, Seattle, WA 98104
(206) 971-3289 office | (206) 769-0680 cell
mhubner@psrc.org | www.psrc.org

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From: Lara Thomas [<mailto:lara.thomas@duvallwa.gov>]
Sent: Friday, February 26, 2016 4:19 PM
To: Michael Hubner
Subject: FW: City of Duvall - Comprehensive Plan Review (email 1)

Michael,

I wanted to follow up with you on our CPA update. Commerce officially has all of our elements for the 60 day review. The City will begin the hearing process in March-April with adoption on April 26. Planning will fill out the PSRC reporting tool and download the materials next week.



Lara Thomas, Planning Director
City of Duvall, PO Box 1300, Duvall WA 98019

Lara.thomas@duvallwa.gov (425) 788-2779 ext 2

From: Lara Thomas

Sent: Friday, February 26, 2016 3:52 PM

To: 'reviewteam@commerce.wa.gov' <reviewteam@commerce.wa.gov>

Subject: City of Duvall - Comprehensive Plan Review (email 1)

Review Team,

The City of Duvall has completed its draft of the 2015-16 Comprehensive Plan. I will send in four emails.

Thank you,

Lara



Lara Thomas, Planning Director

City of Duvall, PO Box 1300, Duvall WA 98019

Lara.thomas@duvallwa.gov (425) 788-2779 ext 2

Lara Thomas

From: Michael Hubner <MHubner@psrc.org>
Sent: Wednesday, March 30, 2016 1:30 PM
To: Boyd Benson
Cc: Lara Thomas
Subject: Growth numbers

Boyd,

Great to touch base today. As promised, here is the table that I hope you can help to populate based on the technical work you did in support of the city's transportation plan.

	City Limits	UGAs	UGARs	Total
2015 Hhlds				
2015 Jobs				
2015 Pipeline				
2035 Hhlds				
2035 Jobs				

I will forward you the other materials soon.

Michael

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Lara Thomas

From: Michael Hubner <MHubner@psrc.org>
Sent: Thursday, March 31, 2016 4:49 PM
To: Boyd Benson
Cc: Lara Thomas; Steven Leniszewski; Troy Davis
Subject: RE: Growth numbers

Thanks, Boyd. I'll look these over and may have questions.

One thing that caught my eye in the transportation element was a summary table showing 2035 PM peak trips, with an increase that almost tripled the total. Most of that increase appears to be due to the assume commercial/employment growth. It appears from your note that that growth is the most uncertain.

Michael

From: Boyd Benson [mailto:boyd.benson@duvallwa.gov]
Sent: Thursday, March 31, 2016 3:55 PM
To: Michael Hubner
Cc: Lara Thomas; Steven Leniszewski; Troy Davis
Subject: RE: Growth numbers

Hi Michael, the requested information is below. Please note the following:

- UGAR summarized is existing UGAR southeast of City.
- Pipeline project numbers are based on construction of 100% of the lots. The growth model we used for the Comp plan and traffic impacts included these numbers at 90%. The purpose of using 100% was to give you a true count of pipeline units.
- The jobs numbers for 2015 are very good. The job numbers for 2035 below are based on the City commercial capacity and are likely too high (some of our 2014 commercial properties have been significantly reduced by the presence of sensitive areas). We also included home employment based on ESD information.
- The big takeaway is that most all of our future City limits growth is pipeline (925/1,126 or 82%).

Thanks and please call with any questions,

	City Limits	UGA ¹	UGAR ²	Total
2015 Hhlds ^{3,4}	2,577	10	41	2,628
2015 Jobs	1,169	0	0	1,169
2015 Pipeline ⁵	925	NA	NA	925
2035 Hhlds	3,703	138	559	4,400
2035 Jobs	2,947	206	84	3,237

No 90% Modifier
Includes rezone

¹UGA= North island Annex, Burhren Annex

²UGAR= Existing area, east of Big Rock Road and Batten Road

³2015 UGA = 10 SFR (9 SFR in North Island, 1 SFR Buhren)

⁴2015 UGAR = 41 SFR (18 SFR South, 23 SFR East)

⁵2015 pipeline 925 = 671SFR, 254 MFU. At 100% of planned development (not 90% per memo)

Note: Current UGA only. Possible UGA south of BRR is not included in table

Boyd E. Benson, PE, LEG
City Engineer
City of Duvall
425-939-8042
www.duvallwa.gov

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Lara Thomas

From: Michael Hubner <MHubner@psrc.org>
Sent: Thursday, March 31, 2016 8:10 PM
To: Lara Thomas
Subject: FW: Growth numbers

Lara,

This information from Boyd really helps to understand the lay of the land with the plan and its relationship to the growth numbers.

Let's try to talk over the phone on Friday. What time works for you?

Michael

Michael Hubner, AICP

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April 4, 2016

Lara Thomas, Planning Director
City of Duvall
P.O. Box 1300
Duvall, WA 98019

Subject: PSRC comments on draft Duvall Comprehensive Plan update

Dear Lara,

Thank you for providing an opportunity for the Puget Sound Regional Council to review draft elements of the City of Duvall Comprehensive Plan. We recognize the substantial amount of time and effort invested in this plan and appreciate the chance to review it while in draft form. This timely collaboration helps to ensure certification requirements are adequately addressed and certification action can be taken by PSRC boards upon adoption.

We would like to note the many outstanding aspects of the draft, which represents a thorough review, update, and streamlining of the required plan elements. Several particularly noteworthy aspects include:

- The plan includes an innovative element on Environment and Sustainability that sets ambitious goals and actionable policy guidance on traditional environmental topics, such as sensitive areas and shorelines, as well as new topics, such as healthy communities and the local economy. The plan is particularly notable in the breadth and depth of its policies protecting wetlands and associated habitat and hydrologic functions. The plan incorporates work completed for the Watershed Plan (2015), including a subbasin framework for tailoring regulations and programs to local context and furthering coordination with King County.
- A climate change goal in the Environment and Sustainability element focuses on steps the city can take to mitigate potential negative impacts of climate change. Goals and policies in the Transportation and Land Use elements also address climate change in encouraging energy efficiency and alternative energy sources and transportation modes.
- The plan advances the concept of healthy communities in several key areas. Numerous provisions in the plan support active transportation options. For example, ES3.1 encourages the inclusion of active elements in new development. ES3.2 calls for the city to provide opportunities for physical activity, especially young people, in city parks and other facilities. Policy ES4.5 promotes food security and access to healthy foods through a broad range of approaches to spur local production and marketing of agricultural products.
- The Housing element is particularly strong effort for a smaller city, particularly in its provisions that encourage a greater diversity of housing types and greater range of affordability to meet local

and countywide needs. Policies in housing (H-3.4, 4.4, 4.5, and 4.7) promote a range of incentive-based tools for affordability in new development. The city is also considering more prescriptive approaches, such as affordability as a condition for pre-annexation (LU5.4) and requiring a share of affordable units with rezones that add capacity (H4.11). The plan encourages more affordable housing types, such as cottage housing, small-lot development, and mixed-uses.

- Through the Comprehensive Plan and Downtown Subarea Plan, the city promotes a vision for more active and attractive central places in and around Old Town, Main Street and SR-203. Land use policies permit mixed-use development in selected locations. Public investments in the public realm enhance walkability and opportunities for the community to gather.
- The Economic Development element provides a strong foundation of analysis across multiple dimensions of the local and regional economy. The city's focus on place-making and building on the city's character is particularly impressive. Notable as well is recognition of opportunities for local employment growth based on the industry clusters identified in the Regional Economic Strategy. Economic goals are supported by land use policies, such as LU6.2, 4, and 5, which encourage development types that provide space for new businesses and other desired activity.
- The plan provides strong support for multiple modes of travel, and, given the context for planning a smaller rural city, is particularly strong in encouraging pedestrian and transit transportation. For example, several policies under Goal T1 address incorporating a network of nonmotorized facilities throughout the community through public investments and private development. The plan expresses the city's goal of increased levels of transit service from Metro and potentially other providers and also includes policies, such as T4.5 and T4.6, that improve the local environment for transit.

The draft Duvall Comprehensive Plan advances regional policy in many important ways. There are a few items, however, that the city should consider before the plan is finalized:

- VISION 2040 calls for local plans to include a context statement that describes how the plan addresses regional policies and provisions adopted in VISION 2040. Examples of context statements are provided in PSRC's Plan Review Manual, page 2-1. PSRC staff is also available to provide examples adopted in other local comprehensive plans. The draft plan includes brief high level references to VISION 2040 that should be expanded based on this guidance, to include recognition of the role of Small Cities in the Regional Growth Strategy.
- RCW 36.70A.130 requires that local comprehensive plan updates accommodate the growth projected to occur over the subsequent 20-year period. VISION 2040 (MPP-DP-3) calls for countywide adoption of housing and employment growth targets that promote the Regional Growth Strategy. MPP-T-9 calls for coordination of state, regional, and local transportation planning in support of that strategy. The targets adopted in King County allocate a modest amount of housing and jobs to Small Cities, which include the City of Duvall, as a reflection of the stated regional role for these cities to accommodate limited growth. The King County targets indicate that, when adjusted for recent growth and a planning period that extends to 2035, Duvall is expected to plan for and accommodate approximately 1,000 additional housing units and 750 additional jobs. In planning for future transportation demand, the city has apparently assumed residential growth of approximately 1,200 housing units, over 900 of which are in the development pipeline. A much larger gap is evident in the assumed employment growth at more than twice the remaining target, with the city projecting approximately 1,800 jobs. Alignment of local plans with the Regional Growth Strategy, as implemented through local targets, is a key criterion for regional certification of the update. As the city finalizes the plan update, approaches to revising future growth numbers, particularly employment growth, should be considered to bring the transportation element into closer alignment with the adopted target. If necessary, the city may need to adopt actions and measures to influence the amount or timing of

future growth to better align with targets and the Regional Growth Strategy. PSRC staff is available to provide technical guidance on this work.

- Policies under Goal LU10 address the orderly and coordinated consideration of areas within the city's Urban Growth Area for future annexation. As noted in the plan, much of the city's future growth will occur in the annexed areas. The city and county, working together, should ensure that the timing and anticipated land uses in annexed areas support the city's ability to align with its allocated growth targets, thus supporting the Regional Growth Strategy. The city may consider adding language to the plan update to highlight the value of coordination with the county and regional context for city growth through annexation.
- Transportation element is largely based on the Transportation Plan Update adopted by Duvall in 2009. While the 2009 plan was a strong body of work that addressed state and regional analytical and policy expectations, it needs to be brought up to date to fully address the criteria for regional certification. The updated transportation plan should continue to address relevant items in the PSRC Plan Review Manual and checklist. Updated background data and analysis should include the following:
 - Inventories of existing facilities, including roads, transit, and bicycle and pedestrian facilities
 - King County 2031 growth targets along with an extension of the targets to the plan horizon year of 2035
 - Updated references to current countywide policies and regional policies and plans
 - Financial assumptions for the required multiyear transportation financing strategy
- The city is commended for affirmatively planning for a share of the countywide need for affordable housing. Page 3-14 of the housing element references "affordable housing targets" in the King County Countywide Planning Policies and shows targets for several income levels in Table H-11. However, the characterization of the CPPs as containing "targets" that are a share of the future overall housing target for each jurisdiction is no longer correct, as that policy has been amended. In its place, CPP H-1 sets overarching goals for the provision of housing affordable to low and moderate income households to be achieved across the entire housing stock. Implications of these goals for each city will vary based on the current affordability of the housing in the community. The draft plan should be amended to address the new CPP H-1.

PSRC has resources available to assist the city in addressing these comments. Additional resources related to the plan review process can also be found at <http://www.psrc.org/growth/planreview/resources/>.

Thank you again for working with us through the plan review process. There is a lot of strong work in the draft and we are available to continue to provide assistance and additional reviews as the plan moves through the development process. If you have questions or need additional information regarding the review of local plans or the certification process, please contact me at 206-971-3289 or mhubner@psrc.org.

Sincerely,



Michael Hubner
Principal Planner, Growth Management Planning

cc: Review Team, Growth Management Services, Department of Commerce

Lara Thomas

From: Boyd Benson
Sent: Tuesday, April 5, 2016 6:56 PM
To: Michael Hubner
Cc: Lara Thomas; Steven Leniszewski; Troy Davis
Subject: RE: Growth numbers

Hi Lara and Michael,

I reviewed April 4 PSRC comments and the information is very useful and informative. We will incorporate the Transportation considerations on Page 3 into the Transportation Plan Update.

The reason that I am responding to both of you at this time is to clarify the commercial/employment information that we previously provided. This clarification is in response to the last item on page 2 of the April 4 PSRC letter (possible considerations, residential and commercial growth).

- For residential growth: we are confident on the pipeline (2015) household numbers which makes up the large majority of residential growth within City limits.
- For commercial growth:
 - The information presented for 2035 employment is based on possible development (employees based on Floor area SF) of all commercial properties within City limits. *This estimate is conservative (high) and does not consider site constraints such as critical areas.*
 - A better understanding of future employment might be based on pipeline(2015) commercial FA SF (see newly-added yellow highlighted information in the table below). The pipeline information accounts for an approximately 43% growth in commercial FA SF, which suggests a similar increase in employment which would result in total employment of approx. 1,680. *This number is more in line with the KC growth allocation.*
 - We could add some clarification to the Economic Development Element (3.1.3, Table ED-3) to address this issue and explain that foreseeable (pipeline) growth is in-line with the King County Allocation. We could also explain that there is the potential for additional (significant) employment growth at non-pipeline properties depending on zoning and parcel-specific site constraints.

There are a lot of numbers here. Let me know if you have questions.

	City Limits	UGA ¹	UGAR ²	Total
2015 Hhlds ^{3,4}	2,577	10	41	2,628
2015 Jobs	1,169	0	0	1,169
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2015 Hhlds Pipeline ⁵	925	NA	NA	NA
2015 Comm SF Pipeline	186,286	NA	NA	NA
2035 Hhlds	3,703	138	559	4,400
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Sent: Thursday, March 31, 2016 3:55 PM

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Cc: Lara Thomas <lara.thomas@duvallwa.gov>; Steven Leniszewski <steven.leniszewski@duvallwa.gov>; Troy Davis <troy.davis@duvallwa.gov>

Subject: RE: Growth numbers

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- The jobs numbers for 2015 are very good. The job numbers for 2035 below are based on the City commercial capacity and are likely too high (some of our 2014 commercial properties have been significantly reduced by the presence of sensitive areas). We also included home employment based on ESD information.
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Lara Thomas

From: Michael Hubner <MHubner@psrc.org>
Sent: Tuesday, April 5, 2016 6:55 AM
To: Lara Thomas
Cc: Paul Inghram
Subject: DRAFT PSRC comment letter on draft Duvall comprehensive plan update
Attachments: PSRC Comments on Draft Duvall Comprehensive Plan DRAFT2.docx

Lara,

As promised, I wanted to share a draft of our comment letter with you prior to sending it officially. Please review and get back to me soon.

We wanted to highlight both the good stuff in the plan (and there is a lot to like!), along with several areas where there are gaps and needs for further work. As we discussed, two of these latter points are at issue with respect to regional certification: alignment of the jobs projection with the target, and update of the transportation plan information. If these can be resolved prior to adoption, then I would foresee a staff recommendation of full certification. Otherwise, we would likely recommend conditional certification, as we discussed. Conditional certification would allow the city to retain eligibility for PSRC funds with a timeline of roughly 18 months to address the identified issues.

Congratulations on making it this far in the process and we look forward to working with you to bring the plan into full conformity with GMA and our regional plans and policies.

Regards,
Michael

Michael Hubner, AICP

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Lara Thomas

From: Lara Thomas
Sent: Thursday, April 14, 2016 5:43 PM
To: Boyd Benson; Michael Hubner
Cc: Steven Leniszewski; Troy Davis
Subject: RE: Growth numbers

- VISION 2040 calls for local plans to include a context statement that describes how the plan addresses regional policies and provisions adopted in VISION 2040. Examples of context statements are provided in PSRC's Plan Review Manual, page 2-1. PSRC staff is also available to provide examples adopted in other local comprehensive plans. The draft plan includes brief high level references to VISION 2040 that should be expanded based on this guidance, to include recognition of the role of Small Cities in the Regional Growth Strategy.

I will add a context statement to the Introduction Chapter – Section 1.42 Consistency with County Wide Policies and (Vision 2040 – NEW).

- RCW 36.70A.130 requires that local comprehensive plan updates accommodate the growth projected to occur over the subsequent 20-year period. VISION 2040 (MPP-DP-3) calls for countywide adoption of housing and employment growth targets that promote the Regional Growth Strategy. MPP-T-9 calls for coordination of state, regional, and local transportation planning in support of that strategy. The targets adopted in King County allocate a modest amount of housing and jobs to Small Cities, which include the City of Duvall, as a reflection of the stated regional role for these cities to accommodate limited growth.

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Alignment of local plans with the Regional Growth Strategy, as implemented through local targets, is a key criterion for regional certification of the update. As the city finalizes the plan update, approaches to revising future growth numbers, particularly employment growth, should be considered to bring the transportation element into closer alignment with the adopted target. If necessary, the city may need to adopt actions and measures to influence the amount or timing of future growth to better align with targets and the Regional Growth Strategy. PSRC staff is available to provide technical guidance on this work.

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- Policies under Goal LU10 address the orderly and coordinated consideration of areas within the city’s Urban Growth Area for future annexation. As noted in the plan, much of the city’s future growth will occur in the annexed areas. The city and county, working together, should ensure that the timing and anticipated land uses in annexed areas support the city’s ability to align with its allocated growth targets, thus supporting the Regional Growth Strategy. The city may consider adding language to the plan update to highlight the value of coordination with the county and regional context for city growth through annexation.

Planning will add language to the plan update to highlight the value of coordination with the county and regional context for city growth through annexation.

- Transportation element is largely based on the Transportation Plan Update adopted by Duvall in 2009. While the 2009 plan was a strong body of work that addressed state and regional analytical and policy expectations, it needs to be brought up to date to fully address the criteria for regional certification. The updated transportation plan should continue to address relevant items in the PSRC [Plan Review Manual](#) and checklist. Updated background data and analysis should include the following:
 - Inventories of existing facilities, including roads, transit, and bicycle and pedestrian facilities
 - King County 2031 growth targets along with an extension of the targets to the plan horizon year of 2035
 - Updated references to current countywide policies and regional policies and plans
 - Financial assumptions for the required multiyear transportation financing strategy

The City acknowledges this comment and will address the criteria for regional certification as part of the 2016 Transportation Plan Update and will then update the Transportation Element in 2017. This will include updated background data and analysis.

- The city is commended for affirmatively planning for a share of the countywide need for affordable housing. Page 3-14 of the housing element references “affordable housing targets” in the King County Countywide Planning Policies and shows targets for several income levels in Table H-11. However, the characterization of the CPPs as containing “targets” that are a share of the future overall housing target for each jurisdiction is no longer correct, as that policy has been amended. In its place, CPP H-1 sets overarching goals for the provision of housing affordable to low and moderate income households to be achieved across the entire housing stock. Implications of these goals for each city will vary based on the current affordability of the housing in the community. The draft plan should be amended to address the new CPP H-1.

Planning will amend the housing elements to address the new CPP H-1.

I will have the revisions completed by the end of next week. The changes will be incorporated into our documents for hearing (May 3 and 4th). I will provide you with a copy of the revisions (I will highlight the changes so that they are easier to track). If you have any questions please let me now.

Lara Thomas



Lara Thomas, Planning Director
City of Duvall, PO Box 1300, Duvall WA 98019
Lara.thomas@duvallwa.gov (425) 788-2779 ext 2

From: Boyd Benson
Sent: Tuesday, April 5, 2016 6:56 PM
To: Michael Hubner <MHubner@psrc.org>
Cc: Lara Thomas <lara.thomas@duvallwa.gov>; Steven Leniszewski <steven.leniszewski@duvallwa.gov>; Troy Davis <troy.davis@duvallwa.gov>
Subject: RE: Growth numbers

Hi Lara and Michael,

I reviewed April 4 PSRC comments and the information is very useful and informative. We will incorporate the Transportation considerations on Page 3 into the Transportation Plan Update.

The reason that I am responding to both of you at this time is to clarify the commercial/employment information that we previously provided. This clarification is in response to the last item on page 2 of the April 4 PSRC letter (possible considerations, residential and commercial growth).

- For residential growth: we are confident on the pipeline (2015) household numbers which makes up the large majority of residential growth within City limits.
- For commercial growth:
 - The information presented for 2035 employment is based on possible development (employees based on Floor area SF) of all commercial properties within City limits. *This estimate is conservative (high) and does not consider site constraints such as critical areas.*
 - A better understanding of future employment might be based on pipeline(2015) commercial FA SF (see newly-added yellow highlighted information in the table below). The pipeline information accounts for an approximately 43% growth in commercial FA SF, which suggests a similar increase in employment which would result in total employment of approx. 1,680. *This number is more in line with the KC growth allocation.*
 - We could add some clarification to the Economic Development Element (3.1.3, Table ED-3) to address this issue and explain that foreseeable (pipeline) growth is in-line with the King County Allocation. We could also explain that there is the potential for additional (significant) employment growth at non-pipeline properties depending on zoning and parcel-specific site constraints.

There are a lot of numbers here. Let me know if you have questions.

	City Limits	UGA ¹	UGAR ²	Total
2015 Hhlds ^{3,4}	2,577	10	41	2,628
2015 Jobs	1,169	0	0	1,169
2015 Comm SF	426,221	NA	NA	NA
2015 Hhlds Pipeline ⁵	925	NA	NA	NA
2015 Comm SF Pipeline	186,286	NA	NA	NA
2035 Hhlds	3,703	138	559	4,400
2035 Jobs	2,947	206	84	3,237

Boyd E. Benson, PE, LEG
City Engineer
City of Duvall
425-939-8042
www.duvallwa.gov

From: Boyd Benson

Sent: Thursday, March 31, 2016 3:55 PM

To: 'Michael Hubner' <MHubner@psrc.org>

Cc: Lara Thomas <lara.thomas@duvallwa.gov>; Steven Leniszewski <steven.leniszewski@duvallwa.gov>; Troy Davis <troy.davis@duvallwa.gov>

Subject: RE: Growth numbers

Hi Michael, the requested information is below. Please note the following:

- UGAR summarized is existing UGAR southeast of City.
- Pipeline project numbers are based on construction of 100% of the lots. The growth model we used for the Comp plan and traffic impacts included these numbers at 90%. The purpose of using 100% was to give you a true count of pipeline units.
- The jobs numbers for 2015 are very good. The job numbers for 2035 below are based on the City commercial capacity and are likely too high (some of our 2014 commercial properties have been significantly reduced by the presence of sensitive areas). We also included home employment based on ESD information.
- The big takeaway is that most all of our future City limits growth is pipeline (925/1,126 or 82%).

Thanks and please call with any questions,

	City Limits	UGA ¹	UGAR ²	Total
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2035 Hhlds	3,703	138	559	4,400
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No 90% Modifier
Includes rezone

¹UGA= North island Annex, Burhren Annex

²UGAR= Existing area, east of Big Rock Road and Batten Road

³2015 UGA = 10 SFR (9 SFR in North Island, 1 SFR Buhren)

⁴2015 UGAR = 41 SFR (18 SFR South, 23 SFR East)

⁵2015 pipeline 925 = 671SFR, 254 MFU. At 100% of planned development (not 90% per memo)

Note: Current UGA only. Possible UGA south of BRR is not included in table

Boyd E. Benson, PE, LEG
City Engineer
City of Duvall
425-939-8042
www.duvallwa.gov

From: Michael Hubner [<mailto:MHubner@psrc.org>]
Sent: Wednesday, March 30, 2016 1:30 PM
To: Boyd Benson <boyd.benson@duvallwa.gov>
Cc: Lara Thomas <lara.thomas@duvallwa.gov>
Subject: Growth numbers

Boyd,

Great to touch base today. As promised, here is the table that I hope you can help to populate based on the technical work you did in support of the city's transportation plan.

	City Limits	UGAs	UGARs	Total
2015 Hhlds				
2015 Jobs				
2015 Pipeline				
2035 Hhlds				
2035 Jobs				

I will forward you the other materials soon.

Michael

Michael Hubner, AICP

Principal Planner | Puget Sound Regional Council
1011 Western Ave., Suite 500, Seattle, WA 98104
(206) 971-3289 office | (206) 769-0680 cell
mhubner@psrc.org | www.psrc.org

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Lara Thomas

From: Lara Thomas
Sent: Friday, April 22, 2016 10:05 AM
To: Michael Hubner
Subject: City of Duvall CP
Attachments: PSRC_CP_edits.docx

This is a rough working draft of our edits to the CP.



Lara Thomas, Planning Director
City of Duvall, PO Box 1300, Duvall WA 98019
Lara.thomas@duvallwa.gov (425) 788-2779 ext 2

Working Document – Revisions to CPB on PSRC Feedback

COMMENT - VISION 2040 calls for local plans to include a context statement that describes how the plan addresses regional policies and provisions adopted in VISION 2040. Examples of context statements are provided in PSRC's Plan Review Manual, page 2-1. PSRC staff is also available to provide examples adopted in other local comprehensive plans. The draft plan includes brief high level references to VISION 2040 that should be expanded based on this guidance, to include recognition of the role of Small Cities in the Regional Growth Strategy.

I will add a context statement to the Introduction Chapter – Section 1.42 Consistency with County Wide Policies and (Vision 2040 – NEW).

Suggest including this after the last paragraph in “1.4.2 Consistency with County-Wide Policies”:

Consistent with King County's County-Wide Planning Policies and PSRC's Vision 2040, Duvall's Comprehensive Plan reflects its position as a small city within the context of a rapidly-growing county and region. The Comprehensive Plan incorporates residential and employment growth targets through 2031 that adopt PSRC target allocations. While maintaining a small town character, Duvall commits to sustainable growth within the regional context, with goals and policies that protect environmentally sensitive areas and open space, provide economic opportunity, promote adequate and affordable housing, improve mobility, and provide additional opportunities for non-motorized and public transportation. The Comprehensive Plan integrates these elements and plans for low-impact, well-designed, compact growth concentrated within the city and designated urban growth areas while preserving surrounding rural and resource lands.

The overall policy direction, goals, and implementation actions contained in PSRC's Vision 2040 are represented throughout the Comprehensive Plan in Land Use, Economic Development, Transportation, Parks, Environment and Sustainability, and other elements. Duvall commits to interjurisdictional planning to facilitate a common vision and efficient use of land, infrastructure, and resources for all citizens. The end result is a Plan that addresses development, design, environmental protection, and social concerns holistically, with provisions for evaluation, monitoring, and revising as local conditions and community preferences change.

COMMENT - Policies under Goal LU10 address the orderly and coordinated consideration of areas within the city's Urban Growth Area for future annexation. As noted in the plan, much of the city's future growth will occur in the annexed areas. The city and county, working together, should ensure that the timing and anticipated land uses in annexed areas support the city's ability to align with its allocated growth targets, thus supporting the Regional Growth Strategy. The city may consider adding language to the plan update to highlight the value of coordination with the county and regional context for city growth through annexation.

Planning will add language to the plan update to highlight the value of coordination with the county and regional context for city growth through annexation.

Suggest revising LU 10.6 to read:

LU 10.6 Ensure Annexations are consistent with King County Countywide Planning Policies and PSRC's Regional Growth Strategy, including coordinating with the County to confirm that the timing and annexed areas' anticipated land uses align with the City's allocated growth targets.

COMMENT - The city is commended for affirmatively planning for a share of the countywide need for affordable housing. Page 3-14 of the housing element references “affordable housing targets” in the King County Countywide Planning Policies and shows targets for several income levels in Table H-11. However, the characterization of the CPPs as containing “targets” that are a share of the future overall housing target for each jurisdiction is no longer correct, as that policy has been amended. In its place, CPP H-1 sets overarching goals for the provision of housing affordable to low and moderate income households to be achieved across the entire housing stock. Implications of these goals for each city will vary based on the current affordability of the housing in the community. The draft plan should be amended to address the new CPP H-1.

Planning will amend the housing elements to address the new CPP H-1.

Suggest revising the following:

(under 3.1.1)

The Goals and Policies provide a framework for meeting short- and long-term housing needs, community preferences, and GMA requirements. The Housing Element Analysis that follows describes Duvall's historic demographics and related housing characteristics, future trends, and strategies for ~~meeting~~ providing affordable housing targets.

(under Policies)

- H4.1 Develop and implement strategies, in collaboration with King County, to provide ~~achieve~~ ~~targets for low- and moderate-income housing that are consistent with~~ the countywide affordable housing needs expressed in the Countywide Planning Policies.

(Under 3.3)

The following section describes Duvall's existing population demographics and household trends, Duvall's population and housing targets based on local plans, policies and inter-jurisdictional coordination efforts, and strategies for ~~meeting affordable housing targets~~ providing adequate affordable housing during the planning horizon. The information contained in this section provides a basis for the goals and policies contained in this Element.

3.3.6.5 Countywide Affordability Targets-Goals

~~The city and county, working together, should ensure that the timing and anticipated land uses in annexed areas support the city's ability to align with its allocated growth targets~~

~~As part of local and regional population projections specified by provisions of the GMA, affordable housing targets are established for the 20-year planning period based on the City's residential growth target. The King County Countywide Planning Policies~~

specifically state a provide a four step process that cities, in collaboration with the County, should follow for meeting countywide affordable housing goals. The process includes: 1) conducting an inventory and analysis of housing needs and conditions, 2) implementing policies and strategies to address unmet needs, 3) measuring results, and 4) responding to these measurements with reassessment and adjustment of strategies. The countywide need for housing by percentage of area median income (AMI) is reflected in Table H-11.

moderate income housing target is equal to 16% of the city's growth target and a low income housing target is equal to 12% of the city's growth target (King County GMPC, 2012). **Table H-11** shows housing affordability targets in Duvall for the 20-year planning period

Table H-11. Housing Affordability Targets Countywide Affordable Housing Needs 2001-2022

	Very-Low Income Need Target (Up to 30% of median income) (12% of total units)	Low Income Need Target (30-50% of median income) (12% of total units)	Moderate Income Need Target (50-80% of median income) (16% of total units)
Growth Target Percentage of Total Units	137 12%	137 12%	182 16%

Source: 2012 King County Countywide Planning Policies, November, 2012.

Duvall will continue to measure household income, housing costs, and housing affordability, and will continue to adjust housing policies and provisions to ensure that adequate low- and middle-income housing is provided during future Comprehensive Plan updates.

COMMENT -RCW 36.70A.130 requires that local comprehensive plan updates accommodate the growth projected to occur over the subsequent 20-year period. VISION 2040 (MPP-DP-3) calls for countywide adoption of housing and employment growth targets that promote the Regional Growth Strategy. MPP-T-9 calls for coordination of state, regional, and local transportation planning in support of that strategy. The targets adopted in King County allocate a modest amount of housing and jobs to Small Cities, which include the City of Duvall, as a reflection of the stated regional role for these cities to accommodate limited growth.

The King County targets indicate that, when adjusted for recent growth and a planning period that extends to 2035, Duvall is expected to plan for and accommodate approximately 1,000 additional housing units and 750 additional jobs. In planning for future transportation demand, the city has apparently assumed residential growth of approximately 1,200 housing units, over 900 of which are in the development pipeline. A

much larger gap is evident in the assumed employment growth at more than twice the remaining target, with the city projecting approximately 1,800 jobs.

Alignment of local plans with the Regional Growth Strategy, as implemented through local targets, is a key criterion for regional certification of the update. As the city finalizes the plan update, approaches to revising future growth numbers, particularly employment growth, should be considered to bring the transportation element into closer alignment with the adopted target. If necessary, the city may need to adopt actions and measures to influence the amount or timing of future growth to better align with targets and the Regional Growth Strategy. PSRC staff is available to provide technical guidance on this work.

For commercial growth:

- The information presented for 2035 employment is based on possible development (employees based on Floor area SF) of all commercial properties within City limits. This estimate is conservative (high) and does not consider site constraints such as critical areas.
- A better understanding of future employment might be based on pipeline(2015) commercial FA SF (see newly-added yellow highlighted information in the table below). The pipeline information accounts for an approximately 43% growth in commercial FA SF, which suggests a similar increase in employment which would result in total employment of approx. 1,680. This number is more in line with the KC growth allocation.
- We will add some clarification to the Economic Development Element (3.1.3, Table ED-3) to address this issue and explain that foreseeable (pipeline) growth is in-line with the King County Allocation. We could also explain that there is the potential for additional (significant) employment growth at non-pipeline properties depending on zoning and parcel-specific site constraints.

There are a lot of numbers here. Let me know if you have questions.

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2015 Comm SF Pipeline	186,286	NA	NA	NA
2035 Hhlds	3,703	138	559	4,400
2035 Jobs	2,947	206	84	3,237

ED policy, and integrating the Transportation policy as an additional option):
 (Under Policies for Goal ED7):

ED 7. 5 Evaluate and refine employment growth and capacity projections, as necessary, to ensure alignment with the regional target allocations and available transportation infrastructure.

T6.9 Regularly update the Transportation Plan to align with regional target allocations for housing and employment growth.

Lara Thomas

From: Lara Thomas
Sent: Wednesday, April 27, 2016 5:25 PM
To: 'Michael Hubner'
Cc: Paul Inghram
Subject: RE: Duvall plan certification options

Michael,

I forwarded to Boyd to get any additional input he may have. I will get back to you on Thursday. It is likely that based on my conversation with Boyd and administration the City will seek option 1.

Lara



Lara Thomas, Planning Director
City of Duvall, PO Box 1300, Duvall WA 98019
Lara.thomas@duvallwa.gov (425) 788-2779 ext 2

From: Michael Hubner [mailto:MHubner@psrc.org]
Sent: Wednesday, April 27, 2016 5:02 PM
To: Lara Thomas <lara.thomas@duvallwa.gov>
Cc: Paul Inghram <PInghram@psrc.org>
Subject: Duvall plan certification options

Lara,

Based on our recent conversation, I am writing to you to clarify what options there are for the timing and process for PSRC certification of Duvall's comprehensive plan update.

As indicated in our letter commenting on a draft of the plan, this is an excellent body of work across multiple plan elements. Thank you for all of your hard work and attention to policies that support implementation of VISION 2040 and the GMA.

You noted that, following the adoption of the comprehensive plan, the city is taking on an update of the transportation plan in 2016. The scope will include aspects that are critical for regional certification, including growth assumptions that align with countywide targets, facilities inventories, analysis of transportation needs, needed improvements, and multiyear financing plan. We also understand that once the transportation plan is adopted in late 2016 or early 2017, the city will amend the transportation element of the comprehensive plan to incorporate relevant information.

Given all of this, we see two options for certification going forward.

Option 1: Conditional certification followed by regular certification.

The city can submit its plan for certification review this spring after adoption. Given the pending transportation planning work that is necessary for full certification, the plan might be conditionally certified, which would allow for additional review following submittal of the updated transportation plan in 2017. During the conditional period, the city retains full

eligibility for regional transportation funds. We have handled plans for some other cities in this way, to provide them with more time to update their transportation planning.

Option 2: Delay submittal of the comprehensive plan for regional certification review until after the update of the transportation plan.

Because the city is not competing for any regionally managed transportation funds this spring, there is no immediate impact of the plan's uncertified status. The city may want to aim to be certified by early 2017 in time for the call for projects for the Rural Town Centers and Corridors funding competition in February or March 2017. This then provides for an option that the city could delay submitting the comprehensive plan update for certification until after the adoption of the transportation plan update. If you prefer this option, it would be important to ensure that the comp plan adopted now makes clear that the city intends to update its transportation needs analysis. You have suggested an additional policy T-6.9 that addresses this, and we would recommend as well additions to the text on pages 12-13 of the transportation element that characterize the future demand analysis.

Please give me a call to discuss these options and I am comfortable that we have viable paths forward toward the city completing a plan that conforms well with our certification criteria.

Regards,
Michael

Michael Hubner, AICP

Principal Planner | Puget Sound Regional Council
1011 Western Ave., Suite 500, Seattle, WA 98104
(206) 971-3289 office | (206) 769-0680 cell
mhubner@psrc.org | www.psrc.org

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Lara Thomas

From: Michael Hubner <MHubner@psrc.org>
Sent: Wednesday, April 27, 2016 5:02 PM
To: Lara Thomas
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Lara Thomas

From: Lara Thomas
Sent: Thursday, April 28, 2016 3:50 PM
To: 'Michael Hubner'
Cc: Paul Inghram
Subject: RE: Duvall plan certification options

Michael,

After checking with our internal team we will work towards option 1. Thanks for all of your help.



Lara Thomas, Planning Director
City of Duvall, PO Box 1300, Duvall WA 98019
Lara.thomas@duvallwa.gov (425) 788-2779 ext 2

From: Michael Hubner [mailto:MHubner@psrc.org]
Sent: Wednesday, April 27, 2016 5:27 PM
To: Lara Thomas <lara.thomas@duvallwa.gov>
Cc: Paul Inghram <PInghram@psrc.org>
Subject: RE: Duvall plan certification options

Thank you, Lara. In many respects, option 1 may be cleaner. We will work with you closely, whichever option you choose.

Michael

From: Lara Thomas [mailto:lara.thomas@duvallwa.gov]
Sent: Wednesday, April 27, 2016 5:25 PM
To: Michael Hubner
Cc: Paul Inghram
Subject: RE: Duvall plan certification options

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