



# Agenda Bill

City Council Special & Regular Business Meetings - 01 Apr 2019

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**Department**

Community Development

**Staff Contact**

Thara Johnson, Senior Planner (206) 436-5574

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**Agenda Bill Title**

Discussion on Resolution No. 410, Establishing the 2019 Comprehensive Plan Amendment Docket.

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**Summary**

The purpose of this agenda item is for the City Council to consider adoption of Resolution No. 410 establishing the 2019 Comprehensive Plan Docket. Staff is requesting that the adoption of Resolution No. 410 be placed on the April 15th Council agenda. Pursuant to city code, action is required by May 1, 2019.

Under State law, the Comprehensive Plan can be amended no more than once per year (with certain exceptions). The process for amending the Comprehensive Plan is contained in Burien Municipal Code section 19.65.095. The amendment process has several distinct steps. The first step was to solicit requests for amendments. A notice was published in The Seattle Times, placed on the City's Web site and posted at City Hall, notifying citizens that the City would accept requests until March 1, 2019.

The second step was for the Planning Commission to conduct the required public meeting to receive public testimony. That meeting was held on March 13, 2019. The staff memo to the Planning Commission provides additional background information regarding the proposed 2019 docket (see Attachment 2).

At their March 13th meeting the Planning Commission considered one (1) individual request for Comprehensive Plan map amendments. The application, along with associated attachments, is included as Attachment 3 to this agenda bill.

On March 27, 2019, the Planning Commission recommended the City Council approve Resolution No. 410 as attached (see Attachment 1).

The final step in the process is for the City Council to approve the docket by resolution.

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**Options**

1. Adopt Resolution No. 410 as presented
2. Modify Resolution No. 410

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**Advisory Board Recommendation**

The Planning Commission recommended approval of Resolution No. 410 as attached, on March 27, 2019.

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**Administrative Recommendation**

Discuss Resolution No. 410 in preparation for action on the April 15, 2019 agenda.

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**Suggested Motion**

No action is required at this meeting.

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**Fiscal Impact**

FUND: N/A

COST OF PROPOSAL: N/A

AMOUNT BUDGETED: N/A

ADDITIONAL REQUIRED: N/A

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**Attachments**

[Attachment 1 DRAFT Resolution No. 410 with Exhibit A](#)

[Attachment 2 Staff Memo to Planning Commission](#)

[Attachment 3 Morella Individual Map Amendment request and staff responses to docket review criteria \(PLA19-0456\)](#)

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ATTACHMENT 1

**CITY OF BURIEN, WASHINGTON**  
**RESOLUTION NO. 410**  
**DRAFT**

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**A RESOLUTION OF THE CITY OF BURIEN, WASHINGTON, RELATING TO THE COMPREHENSIVE PLAN OF THE CITY OF BURIEN, AS REQUIRED AND ADOPTED PURSUANT TO THE GROWTH MANAGEMENT ACT OF 1990, AS AMENDED (RCW CHAPTER 36.70A), AND AS ADOPTED PURSUANT TO RCW CHAPTER 35A.63; ESTABLISHING THE CITY'S 2019 COMPREHENSIVE PLAN AMENDMENT DOCKET AND WORK PROGRAM.**

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WHEREAS, the Burien City Council adopted the Comprehensive Plan of the City of Burien on November 17, 1997 as required by the Growth Management Act ("GMA") of 1990, as amended, and also adopted the Comprehensive Plan pursuant to RCW Chapter 35A.63; and

WHEREAS, the Growth Management Act authorizes the City to amend the Comprehensive Plan on an annual basis and requires cities to periodically conduct a thorough review of their plans and regulations to ensure they are consistent with changes in the Act; and

WHEREAS, in 2014 the City of Burien completed the last phase a thorough Growth Management Act review and completed its last annual amendment process in December of 2015; and

WHEREAS, the City of Burien in 2011 conducted a Visioning process and desires to incorporate this vision into its Comprehensive Plan; and

WHEREAS, the City of Burien intends to update its Comprehensive Plan to comply with relevant State, regional and county planning documents; and

WHEREAS, the City of Burien followed public participation procedures as set forth by BMC 19.65.095; and

WHEREAS, on December 30, 2018 the City of Burien issued a Notice of Comprehensive Plan Review and Update, informing the general public of the update and how they may participate in establishing the scope of work; and

WHEREAS, on March 13, 2019, the City of Burien Planning Commission held a public meeting to allow for interested parties to comment on a draft docket and on March \_\_\_\_, 2019 and made a recommendation to the Burien City Council; and

WHEREAS, the City Council held a public meeting to consider requests for amending the Comprehensive Plan; and

WHEREAS, the City of Burien received one (1) citizen initiated amendment request, which is included in the Docket and Work Program attached hereto as Exhibit A.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF BURIEN, WASHINGTON, DOES RESOLVE AS FOLLOWS:

Section 1. 2019 Comprehensive Plan Amendment Docket Adopted. The City Council directs City staff and the Planning Commission to analyze, study, and make recommendations to City Council on the items listed on the Docket and Work Program attached hereto as Exhibit A.

PASSED BY THE CITY COUNCIL OF THE CITY OF BURIEN, WASHINGTON, AT A REGULAR MEETING THEREOF THIS \_\_\_\_ DAY OF APRIL, 2019.

CITY OF BURIEN  
James Matta, Mayor

ATTEST/AUTHENTICATED:  
Monica Lusk, City Clerk

Approved as to form:  
Lisa Marshall, City Attorney

Filed with the City Clerk: April \_\_\_\_, 2019  
Passed by the City Council: April \_\_\_\_, 2019  
Resolution No. 410

**RESOLUTION 410—EXHIBIT A**  
**2019 COMPREHENSIVE PLAN AMENDMENTS**  
**DOCKET AND WORK PROGRAM**  
 April \_\_\_\_, 2019

**2019 Prioritized Comprehensive Plan Docket Items**

Item No.	Priority	Topic	Item Description/Background
1	H	Integrate required elements of Vision 2040 <ul style="list-style-type: none"> <li>• Document how housing and employment targets were extended to 2035.</li> <li>• Reference the Transportation Master Plan to include the supporting technical analysis on existing conditions and analysis of the system addressing the GMA requirements.</li> <li>• Update baseline of existing conditions (Chapter 4) and include a summary of local economic conditions.</li> <li>• Support the updates to the Housing Element by:               <ul style="list-style-type: none"> <li>- Preparing an inventory and needs analysis.</li> <li>- Considering the “missing middle” element including possible goals and policies.</li> </ul> </li> </ul>	Ongoing docket item. To best compete for grants and other funding sources Burien’s document must be certified by PSRC. This requires the plan to include goals and policies that align and are consistent with this regional planning document. (modified by City Council on April 2, 2018)
2	H	Comply with applicable State Environmental Policy Act Review Requirements.	Ongoing docket item. SEPA processes must be followed each update cycle.
3	H	Streamline Plan, combine or eliminate goals and/or policies as needed or are no longer applicable.	Ongoing docket item. The City continually evaluates the plan for opportunities to streamline and simplify its contents.

4	H	Update Downtown section in coordination with preparation of a Growth Center Plan (following TS completion in 2017). Adoption of an Urban Centers subarea Plan and concurrent area wide rezone	A PSRC required item. Regional Growth Center plans are required by PSRC. (Added in 2015). The item was initially scheduled to coincide with Town Square completion, but given delays in the developments progress the item has been moved further into the future. Some components of the plan may be able to start earlier than indicated here and be supported by the outcomes of the downtown Mobility Study.
5	H	Comprehensive Plan Map amendment request from Enzo Morella (owner). File No. PLA 19-0456. Change designation of one parcel from Community Commercial to High Density Multifamily Neighborhood.	Individual amendment request (legislative).
6	H	Address the Neighborhood Plan Element Chapter 2.12 by developing guidelines and polices for plan development.	Added by City Council on April 2, 2018
7	H	Subarea Plan for the Ambaum Corridor and concurrent area wide rezone	Council/staff recommendation in 2018
8	H	Subarea Plan for Bouelyard Park area and concurrent area wide rezone using Ambaum Corridor Subarea Plan as template	Council/staff recommendation in 2018

<b>Ref. No.</b>	<b>INDIVIDUAL PROPOSED AMENDMENTS</b>	<b>Proposed By</b>
2019-1	<b>Comprehensive Plan Map Amendment Request</b> <b>Parcel No.:</b> 302304-9037 <b>Addresses:</b> 213 SW 160 <sup>th</sup> Street <b>File No.</b> PLA 19-0456 <b>Request:</b> Comprehensive Plan change from Community Commercial to High Density Multifamily Neighborhood.	Enzo and Guiseppe Morella (Owners)



City of Burien  
400 SW 152nd Street  
Suite 300  
Burien, WA 98166-1911

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[burienwa.gov](http://burienwa.gov)

## MEMORANDUM

**To:** Burien Planning Commission

**From:** Thara Johnson, Senior Planner

**Date:** March 21, 2019

**Subject:** Recommendation on 2019 Comprehensive Plan Amendment Docket

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### PURPOSE

The purpose of this agenda item is for the Planning Commission to make a recommendation to the City Council on which potential Comprehensive Plan amendments to include in the City's 2019 Comprehensive Plan amendment docket. The docket serves as a work program listing items to consider as possible amendments to the Comprehensive Plan. A draft version of Resolution No. 410 establishing the 2018 Comprehensive Plan docket is included as Attachment 1.

Burien Municipal Code (BMC 19.65.095.2.A, B and C describes the steps in the plan amendment process:

- A. By January 1, the City will issue notice of the annual Comprehensive Plan amendment request deadline. The amendment request deadline is March 1.
- B. The Director will create a preliminary docket of amendment requests received by the March 1 deadline. The Planning Commission shall hold at least one public meeting on the preliminary docket to consider testimony and make recommendations to the City Council on which amendments to consider, and may recommend a priority be assigned to each proposed amendment.
- C. The City Council shall consider the recommendations of the Planning Commission on the preliminary docket, and by May 1 adopt by resolution a final docket of Comprehensive Plan amendments for consideration. [Ord. 397 §4, 2003]

## **PUBLIC COMMENT**

A public notice of the annual amendment process was issued on December 30, 2018 (see Attachment 2). There was 1 application received for comprehensive plan map amendments by the March 1, 2019 deadline (see Attachments 3).

At the March 13, 2019 meeting, time was allowed for the general public to provide input on the City proposed docket. There was no public testimony or comments received at the meeting.

## **DOCKETING CRITERIA**

The Burien Municipal Code contains criteria that shall be used to determine if a proposed amendment should be placed on the docket. Those criteria are as follows;

### **BMC 19.65.095 Comprehensive Plan Amendments**

4. Docketing Criteria. The City Council shall use the following criteria for deciding whether a proposed amendment is added to the docket in subsection 2.C of this section:

- A. The request has been filed in a timely manner, and either:
- B. State law requires, or a decision of a court or administrative agency has directed, such a change; or
- C. All of the following criteria are met:
  - i. The proposed amendment presents a matter appropriately addressed through the Comprehensive Plan; and
  - ii. The City has the resources, including staff and budget, necessary to review the proposal; and
  - iii. The proposal does not raise policy or land use issues that are more appropriately addressed by an ongoing work program item approved by the City Council; and
  - iv. The proposal will serve the public interest by implementing specifically identified goals of the Comprehensive Plan or a new approach supporting the City's vision; and
  - v. The proposal has not been considered by the City Council in the last three (3) years. This time limit may be waived by the City Council, if the proponent establishes that there exists a change in circumstances that justifies the need for the amendment.

The City received one application and has prepared a response to each of the applicable criteria listed above and has included it as Attachment 3. Staff recommends that the request be included on the 2019 docket.

## **PLANNING COMMISSION ACTION**

Pursuant to BMC 19.65.095.2.B (see above), the Commission should make recommendations to the City Council on which amendments to consider, and may recommend a priority be assigned to each proposed amendment. The recommended priority rank is included in Attachment 1, Exhibit A, a simple high (H), medium (M) and low (L) ranking system was used. Staff retained the same rankings that were assigned last year by the City Council.

Action by the City Council is required by May 1, 2019. The Commission has two options for consideration at this meeting. Options are provided below. Staff recommends Option 1.

**Option 1: Recommend approval of the 2019 docket.** This option recommends approval of the 2019 docket as presented.

*Option 1 suggested motion:* I move to recommend the City Council adopt Resolution No. 410 establishing the 2019 Comprehensive Plan amendment docket.

**Option 2: Modify the proposed 2019 docket.** This option would alter the proposed docket by adding and/or removing item(s).

*Option 2 suggested motion:* I move to recommend the City Council adopt Resolution No. 410 establishing the 2019 Comprehensive Plan amendment docket.

(Once the motion is made and seconded, another motion may be presented)

I move to modify the Comprehensive Plan amendment docket as presented in Resolution 410 by adding \_\_\_\_\_ and/or removing \_\_\_\_\_.

And/or

I move to modify the Comprehensive Plan amendment docket as presented in Resolution 410 by amending the following \_\_\_\_\_.

If you have any questions before the meeting, please contact Thara Johnson at (206) 436-5574 or by e-mail at [tharaj@burienwa.gov](mailto:tharaj@burienwa.gov).

### **Attachments:**

- 1) DRAFT Resolution 410 with Exhibit A
- 2) Comprehensive Plan Amendment Notice Request
- 3) Comprehensive Plan Docketing Review Criteria and Staff responses, File No. PLA 19-0456, Morella
- 4) Application for a Comprehensive Plan Map request, 213 SW 160<sup>th</sup> Street (Morella)



# Burien

Washington, USA

## Comprehensive Plan Amendment Request

400 SW 152<sup>nd</sup> Street, Suite 300 Burien, WA 98166  
Phone: (206) 241-4647 • FAX: (206) 248-5539  
www.burienwa.gov

Amendment Type	Reference Number (staff will assign)
<input type="checkbox"/> Map amendment	PIA-19-DA56
<input type="checkbox"/> Text amendment	

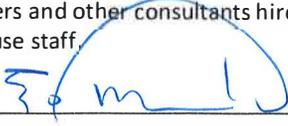
APPLICANT INFORMATION		
Name: Scott Becker	Company: the design COLLECTIVE	Daytime Phone: 206-282-2730
Mailing Address: 2303 W Commodore Way, Suite 205, Seattle, WA 98199		E-mail: scottb@thed-c.com
Contact person: Scott Becker	E-Mail: scottb@thed-c.com	Daytime Phone: 206-282-2730
Property owner: Enzo & Giuseppe Morella		Daytime Phone: 206-501-8100
Mailing Address: 213 SW 160th St., Burien, WA 98166		E-Mail: cblc1@msn.com

SITE INFORMATION (if applicable)	
Site Address: 213 SW 160th St., Burien, WA 98166	Parcel Number: 3023049037
Existing Zoning District: Community Commercial 2	Existing Comprehensive Plan designation: Community Commercial
	Requested Plan designation: High-Density Multi-Family
Number of Acres: 1.14	Current Land Use: Single Family & Office
Critical areas present: <input type="checkbox"/> Wetlands <input type="checkbox"/> Streams <input type="checkbox"/> Critical Aquifer <input type="checkbox"/> Landslide Hazard Area <input type="checkbox"/> Fish & Wildlife	
Brief description of proposal (attach additional sheets if necessary):	
Amend the comprehensive plan map designation to allow high-density Multifamily development of presently underutilized property near the Neighborhood Center.	
<p><b>RECEIVED</b></p> <p><b>MAR 01 2019</b></p> <p><b>CITY OF BURIEN</b></p>	

### SIGNATURE

I, Enzo Morella, declare that I am the owner of the property involved in this application, and that the foregoing statements and answers herein contained and the information herewith submitted are in all respects true and correct to the best of my knowledge and belief. I designate Scott Becker to act as my agent with respect to this application. I agree to reimburse the City of Burien for the costs of professional engineers and other consultants hired by the City to review and inspect this proposal when the City is unable to do so with existing in house staff.

Dated: 2/28/2019

Signature: 

Thara Johnson  
Senior Planner  
400 SW 152<sup>nd</sup> St., Suite 300  
Burien, WA 98166

March 1, 2019

**RE: 213 SW 160<sup>th</sup> St. – Morella Property**  
**SUBJECT: COMPREHENSIVE PLAN AMENDMENT PROPOSAL**

Dear Thara,

Thank you for the opportunity to provide a proposal for a Comprehensive Plan Amendment for the 213 SW 160<sup>th</sup> St., Burien property (Tax No. 3023049037). We appreciate your help in directing us to reference documents and review process requirements.

The attached proposal outlines *Description of Request, Description of the Property, Description of the Neighborhood and Response to Comprehensive Plan Amendment Criteria*.

The *Comprehensive Plan Amendment Request* has been provided as a separate document with signature of the Owner designating myself as the Applicant.

We look forward to working with you on this exciting step forward in the progress of well-planned growth in Burien!

Sincerely,  
the design COLLECTIVE



Scott M. Becker, AIA



## **Introduction**

### **Description of Request**

- Owners, Giuseppe & Enzo Morella, request a Comprehensive Plan Map amendment so that the property at 213 SW 160<sup>th</sup> St., which is currently designated as Community Commercial, can be amended to High Density Multi-Family Neighborhood.

### **Description of the Property**

- The subject site is a rectangular parcel, with primary frontage on and access from SW 160<sup>th</sup> Street on the north. It is bordered by a similarly scaled property on the west containing a recently built, multistory light medical building; forested lots to the south; and smaller aggregated properties on the east – all commercially zoned. We understand the undeveloped parcel to the south may contain perennially wet areas of unknown classification. The total site area is 49,494 SF (1.14 AC).
- The site contains an 1,800 SF single-level wood frame residence in use as a commercial landscape service operation by the owners. The remainder of the site holds a detached garage/shop and fenced open area with equipment and ground covering materials.
- The site has a grade elevation drop from the frontage to the center of the site of approx. 4-6 ft. The owners wish to investigate this advantage for access to covered parking.
- The site zoning is currently Community Commercial 2. This zoning sets building height maximum at 35'. The owners are hoping to achieve a scale and massing more consistent with a 4-6 story apartment-over-commercial buildings in a neighborhood center.

### **Description of the neighborhood**

- The subject site sits among a group of underutilized properties, once targeted for redevelopment by a retailer. The existing uses to the west along SW 160<sup>th</sup> St are light medical, office and single family residential respectively. The south is relatively vacant, rough graded or forested property. East is existing multi-family, and farther east at 1<sup>st</sup> Ave S is a corridor of commercial and existing medium density housing.
- We understand the three contiguous lots immediately south of the subject property (tax nos. 3023049036, 3023049089 & 3023049376) have received Comprehensive Plan amendments to go from Community Commercial to High Density Multi-Family Neighborhood within the last several years.
- The subject property is now, and will continue to be, accessed from the minor arterial of S 160<sup>th</sup> Street. This frontage may become a vehicle and pedestrian conduit to the planned increased density along the 1<sup>st</sup> Ave S. Local Improvement District (see Exhibit 1).

**Response to Comprehensive Plan Amendment Criteria:**

- A. The proposed amendment is the best means for meeting an identified public benefit; and  
*Goal RE 1.7.2. allows for Low & Mid Density Multi-family neighborhoods to serve as transition from higher intensity designations such as commercial or multi-family to single-family residential. The existing multi-family (Fox Cove Apartments) and Local Improvement District #2 to the west of the site is at a higher intensity designation. The properties immediately south of the site are targeted for High Density Multi-Family. The single-family neighborhood west of 4<sup>th</sup> Ave SW is a lower intensity designation. Designation of the subject property for High Density Multi-family is the best way to transition from the Improvement District and existing High Density to the west, to the eastward single-family neighborhood.*

- B. The proposed amendment is consistent with the Growth Management Act, applicable Puget Sound Regional Council (PSRC) plans, King County Countywide Planning Policies and Burien Comprehensive Plan; and  
*The Growth Management Act, RCW 36.70A.020, sets out 13 planning goals, and those planning goals inform all the other planning documents. Not all of those are relevant to the present application, but this application is consistent with those that are relevant.*

*The 1st and 2nd goals seek to encourage development in urban areas and reduce urban sprawl. The requested amendment will allow one residence & small business on a large lot which at the maximum density allowed by the current designation would hold up to 27 residences (a maximum density of 24 units per acre) to be replaced with up to 54 residential units (up to 48 units per acre). This application is consistent with those goals.*

*The 3rd goal doesn't apply to this application.*

*The 4th goal encourages the availability of affordable housing and promotes a variety of residential densities and housing types. Inclusion of high density multi-family housing between the existing low density residential neighborhood to the west, and the Improvement District serves that goal.*

*The 5th goal encourages economic development that is consistent with adopted comprehensive plans, promotes the recruitment of new businesses and encourages growth in areas experiencing insufficient economic development. This application will encourage new economic development with commercial frontage and more apartment tenancy in an area that has not experienced economic growth in decades.*

- C. The proposed amendment will result in a net benefit to the community; and  
*When the property is redeveloped, Burien will lose the older single-family home structures now on the property to demolition, and the possible maximum 26 additional homes or low-rise commercial, that could be added under the present designation. In place of those homes the City will gain the ability to replace retrofitted, but underutilized property, with up to 53 new residences in a well-planned development.*

*The proposed amendment will encourage faster redevelopment of the property, adding to the total housing stock in Burien and is more likely to add housing that*

*is affordable to a larger segment of the population than a lower density "garden apartment" proposal would most likely produce there.*

*In addition, the added residents adjacent to the Improvement District would enhance the economic viability of the businesses there with economic benefits for the entire City.*

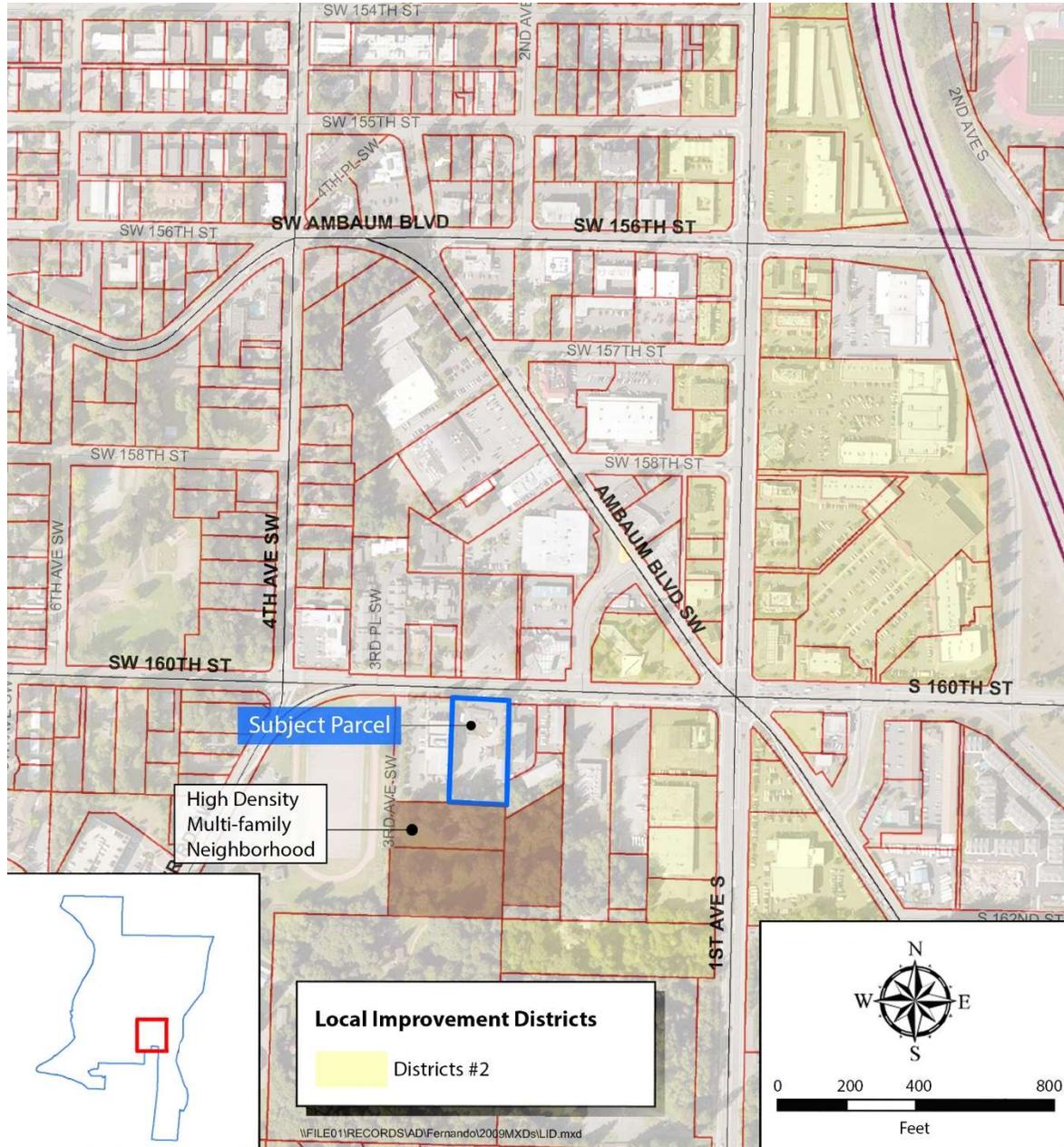
- D. The revised Comprehensive Plan will be internally consistent; and  
*The proposed map amendment will revise only the map, not the Comprehensive Plan. As discussed elsewhere in this application, the map amendment is consistent with the comp plan.*
- E. The capability of the land can support the projected land use; and  
*The property is part of drainage basin, but otherwise is not in any critical area that would bar development for a use consistent with the High Density Multifamily zone. The land drops very gently from the street to the back of the property. There are no areas of standing water on the property. There is no question that the land can support high density multi-family development.*
- F. Adequate public facility capacity to support the projected land use exists, or can be provided by the property owner(s) requesting the amendment, or can be cost-effectively provided by the City or other public agency; and  
*The property has ~130 feet of frontage on SW 160<sup>th</sup> St. (which functions as a local arterial), and is within 1,000 feet of 1<sup>st</sup> Ave S, which is a collector arterial, and within 1/2th mile of SR 509.*
- G. The proposed amendment will be compatible with nearby uses; and  
*The subject property sits between the existing 1<sup>st</sup> Ave S corridor and the existing residential neighborhoods and office use. The greater residential neighborhood is designated in the Comprehensive Plan as Moderate Density Single Family, and is zoned Residential Single Family 7,200. Both designations are intended to allow development at a density of six units per acre. Actual development of the area is closer to two units per acre.*
- H. The proposed amendment would not prevent the City from achieving its Growth Management Act population and employment targets; and  
*This proposal will increase the available housing stock in the City.*
- I. Conditions have changed since the property was given its present Comprehensive Plan designation so that the current designation is no longer appropriate:  
*The present Community Commercial designation for the site was created at a time the city anticipated the redevelopment of contiguous sites by a large box chain store that would have served south Burien. It seemed appropriate at the time since the property was used as a single-family residence, had long been zoned single family, and there was no request at the time for a different designation.*

*Since then, the adjacent Local Improvement District has been designated as such by the City and the number of businesses in that corridor has grown. Now it is likely that business development along S. 160<sup>th</sup> will expand further, creating a greater need for a transition from the Density to the north and east to the single family residential neighborhoods to the west and south.*

*The changes alluded to mean the most appropriate use for the property is as a multi-family transition from the business uses in the 1<sup>st</sup> Ave corridor, to the lower density residential neighborhood and office use surrounding it.*

EXHIBIT #1

VICINITY MAP



the design COLLECTIVE

# VICINITY MAP

March 1, 2019

# 2019 Comprehensive Plan Map Amendment Request

## File No. PLA 19-0456 (Morella)

### Comprehensive Plan Docketing Criteria Review

The following is a review of the docketing criteria for the requested comprehensive plan map amendment (file No. PLA 19-0456). Each of the criteria is followed by a staff response. The responses are based on the application received from the applicant on March 1, 2019.

#### **BMC 19.65.095 Comprehensive Plan Amendments.**

**4. Docketing Criteria.** The City Council shall use the following criteria for deciding whether a proposed amendment is added to the docket in subsection 2.C of this section:

A. The request has been filed in a timely manner, and either:

***Response:** The applicant submitted an application and all associated filing fees on March 1, 2019, prior to the 5:00 PM March 1, 2019 submittal deadline. This criteria has been satisfied.*

B. State law requires, or a decision of a court or administrative agency has directed, such a change; or

***Response:** Not applicable.*

C. All of the following criteria are met:

i. The proposed amendment presents a matter appropriately addressed through the Comprehensive Plan; and

***Response:** The requested change of the comprehensive plan map is a matter that is directly related to the comprehensive plan including but not limited to a change of the long range planning map and evaluating the change using applicable land use designation criteria.*

ii. The City has the resources, including staff and budget, necessary to review the proposal; and

**Response:** *The City has the resources to review this request.*

iii. The proposal does not raise policy or land use issues that are more appropriately addressed by an ongoing work program item approved by the City Council; and

**Response:** *There is no other work program item that will more appropriately address the request.*

iv. The proposal will serve the public interest by implementing specifically identified goals of the Comprehensive Plan or a new approach supporting the City's vision; and

**Response:** *The applicant requests a change of 1 parcel from Community Commercial to High Density Multifamily to provide land to construct multifamily housing. The intended redevelopment of underutilized land will provide more housing opportunities and help meet adopted growth targets. The subject parcel currently contains one single-family residence which is being utilized as a commercial landscape operation.*

*The request will be reviewed in greater detail to determine if the proposed land use designation change will be consistent with the goals and policies of the comprehensive plan.*

v. The proposal has not been considered by the City Council in the last three (3) years. This time limit may be waived by the City Council, if the proponent establishes that there exists a change in circumstances that justifies the need for the amendment.

**Response:** *The requested land use designation change has not been considered by the City Council in the last three years.*