

July 6, 2020

Lauren Prentice, Director
Walla Walla County
Community Development Department
310 W. Poplar Street
Walla Walla, WA 99362

RE: Burbank UGA Residential Density Comprehensive Plan and Code Amendments Project

Dear Lauren,

This letter provides a general revised review, scope and expectations for the Burbank comprehensive plan/code amendment project. The draft scoping document that was originally prepared at the end of February and presented to County staff has been revised due to the COVID-19 closures and ongoing restrictions.

Project Review & Understanding

- Based on prior communication/reports with PC/BOCC, the following policy issues need to be addressed:
 - Should additional development standards for manufactured home parks be adopted?
 - What additional residential zoning classifications, if any, are needed in the Burbank Urban Growth Area? Currently there is only one residential zoning district (BR-Burbank Residential) in the Burbank UGA, which allows a variety of type of residential development.
 - What should the maximum allowed residential density be in the Burbank Urban Growth Area?
 - What lot sizes should be allowed in the Burbank Urban Growth Area?
- Other than the interim zoning adopted by the Board of County Commissioners (Ordinance 471), and extended (Ordinance 480/483), there is no maximum density or minimum lot sizes in the development regulations for the Burbank Residential zoning district, except for a limit on the density of multi-family residential.
- Walla Walla County Comprehensive Plan - Chapter 5.2.5.2 Burbank Growth Area - states that the Burbank area anticipates the development of full urban services over time and land has been designated and zoned for urban level of development. A long-term goal of the community has been its eventual incorporation.

- There is currently language in the Burbank Subarea Plan, as well as policy direction, that suggests allowance for a wide range of urban residential densities.
- The Port has stated they are able to provide water and sewer services within the Burbank UGA for a higher density development than what was previously anticipated (when no utilities were available). However, it should be noted that currently the system only serves Port-owned properties, the Columbia School District, and a small local water district.
- While the Burbank Subarea Plan supports urban development, members of the public have expressed that it may not be in the best interest to allow for higher densities above 4 units per acre. Concerns relate to higher density, public safety, traffic, infrastructure, schools, among others.
- It is clear from the comments received at the June 29, 2019 Burbank Community Meeting, as well as the comment letters received between 2018-19 that the majority of residents who have submitted comments wish to keep the density capped at no more than 3-4 units per acre. Some have even stated that they wish to have no more than 1-2 units per acre, which is consistent with the Burbank Heights area. This area is not located within the UGA, it is a rural zoning district.

Walla Walla County Comprehensive Plan Goals & Policies

Excerpts from the Vision Statement and Introduction of the Walla Walla County Comprehensive Plan:

Housing: We encourage a variety of housing opportunities to choose from in the urban and rural areas. We maintain and provide for housing that meets a range of incomes.

Burbank Area planning began in 1960s; 1968 Burbank Development Plan; Western Walla Walla Comprehensive Plan; revised Comp Plan in 1981, Burbank/Burbank Heights Plan; 1990s GMA, adoption of Burbank UGA

The following Burbank Subarea Plan Goals and Policies relate to proposed development and future Burbank development pattern:

- Goal BU 2 Provide the public policy framework for orderly development of the area while maintaining the rural character and lifestyle of the community outside the Burbank UGA.
- Policy BU 2.2 Guide the development of the community with a balance of residential, commercial, industrial, and agricultural land uses.

Policy BU 2.3 Encourage land use decisions that are sensitive to the character of the community.

Policy BU 2.4 Encourage new residential development to locate in areas near or adjacent to existing development prior to the expansion into the outer periphery of the community.

Goal BU 5 Develop and preserve residential neighborhoods.

Policy BU 5.1 Provide separate areas in the community for different types and densities of housing.

The following Housing Goals and Polices are listed in the Walla Walla County Comprehensive Plan:

Goal HS 3 Encourage diversity in type, density, and location of housing within the county, while protecting health, safety, and the quality of life.

Policy HS 3.1 Implement development standards that allow for a range of housing types, such as single-family, duplexes, townhouses, zero lot-line, accessory dwelling units, and condominiums.

Policy HS 3.3 Continue to permit manufactured homes throughout the County.

Policy HS 3.4 In planning for a wide range of housing opportunities, be cognizant of neighborhood character.

The following housing-related polices are listed in the Countywide Planning Policies (CPP):

8.1 Encourage and promote a wide range of housing development types and densities throughout the county to meet the needs of a diverse population and to provide affordable housing options of all income levels.

8.2 Encourage affordable housing through innovative land use techniques such as clustering, planned unit development, infill housing incentives, density bonuses, etc.

8.4 The county should provide appropriately zoned lands and location criteria to assure the inclusion of multi-family housing and manufactured home parks within UGAs.

- 8.10 All housing projects within an urban growth area, but outside of city limits, shall be reviewed to ensure compatibility with the urban density projections of the comprehensive plan.

Potential Actions/Amendments for Consideration

1. **No Action (to adopt new regulations)** – Interim ordinance expires, prior zoning regulations with no maximum density or minimum lot size would be in effect for single-family residential uses and manufactured home parks. No new manufactured home park development standards would be adopted; manufactured home parks would have to go through conditional use permit review and comply with setbacks and other development standards. Multi-family dwellings and townhomes would remain limited at 4 units/acre in BR zone.
2. **Adopt Low-Density Regulations** – Regulations that would adopt a density of no higher than 2-3 units/acre within the BR zone. This is lower than what the Burbank UGA is developed at, most similar with scale of existing adjacent single-family development in the BR zone (Columbia/Adair between Reinken and Ray), and similar to suburban zoning that is surrounding the City of Walla Walla (R-96).
3. **Adopt Medium-Density Regulations** – Regulations as currently capped per interim ordinance (Ord. 483) would be permanently adopted (limit manufactured home parks, residential subdivisions, and all residential land uses to a maximum of 4 units/acre). This is similar with the scale of existing adjacent single-family development in the BR zone (Hanson Loop/Columbia Rd between Reinken and Ray), and similar to suburban zoning that is surrounding the City of Walla Walla (R-60 or R-72).
4. **Adopt High-Density Regulations** – This option would consider densities over 4 units/acre, depending on expected allowance for water/sewer by Port. This is most similar to the oldest section of Burbank (downtown), and similar to zoning surrounding the City of Walla Walla (Multiple Family Residential).
5. **Adopt Mixed-Density Regulations** – This option could consider densities over 4 units/acre, depending on expected allowance for water/sewer by Port. Rather than implementing a single residential zoning district within the Burbank Residential UGA, low, medium, and/or high-density zoning could be adopted within different areas of the UGA.

For any scenario listed above, the County may consider:

- a. Adoption of a stand-alone Manufactured Home Park Chapter of the Walla Walla County Code (WWCC). This could include development standards for both manufactured home parks and manufactured home subdivisions. Standards may

include, but are not limited to, setbacks, open spaces, buffer strips, landscaping, signage, parking, lighting. Also, could require a HOA to be established to help maintain long-term appearance.

- b. Consider other innovative design techniques (PUDs, development agreements) to allow for development at varying densities, while still protecting character. The County's current PUD standards to not allow for increased density, but this could be incorporated into the development standards.

Steps in the Amendment Process

Listed below are the additional steps in the amendment process.

1. **Planning Commission Workshop(s)** – to discuss/development proposed amendments and options for consideration (based on above list). A workshop meeting would be an open public meeting, meaning that members of the public could attend the meeting, but verbal public testimony would not be accepted. A Planning Commission workshop meeting could occur virtually, via Cisco Webex.
2. (Optional) **Board of County Commissioner Workshop(s)** – A Board of County Commissioners workshop meeting may be held prior to development of the final amendment proposal(s) or prior to the BOCC public hearing (#9).
3. **Identify Final Amendment Proposal(s)** – In order to complete the review process, get public input, etc. a final amendment proposal or proposals must be prepared.
4. **Transmittal to State** – County staff must transmit a copy of all proposed amendments to the Washington State Department of Commerce at least sixty (60) days prior to the expected date of final action by the Board of County Commissioners (WWCC 14.10.070D, 14.15.070D).
5. **SEPA Environmental Review** – the County Community Development Department Director must complete review under the Washington State Environmental Policy Act (SEPA) and WWCC Chapter 18.04. This requires preparation of an Environmental Checklist and issuance of a Threshold Determination (typically a Determination of Non-Significance). The SEPA review process includes a 14-day public and agency comment period and requires distribution to interested parties. After the comment period has ended and the SEPA determination is final, there is a 14-day appeal period.
6. **Broad Public Dissemination** – The proposed amendments must be broadly disseminated to the public and outside agencies. Typically this occurs via a variety of methods: publication of notices in newspapers; emails to interested parties who have asked to be notified; general news media notification; mailed notice to property owners

whose property is directly affected (optional for area-wide amendments); posting on the internet; and displays in public facilities.

7. **Informational Public Meeting** – WWCC 14.10.050B(2) and 14.15.050B(2) requires that at least one informational public meeting should be held to allow members of the public to get information regarding proposed Comprehensive Plan and Development Regulations Amendments. The proposed amendments (actions) should be available for the public at this meeting. This meeting should be held in the Burbank area; typically, it is held on the same day as the Planning Commission Public Hearing.
8. **Planning Commission Public Hearing** – The Planning Commission must have a public hearing on the proposed amendments (WWCC 14.10.070B and 14.15.070B). Following the public hearing, the Planning Commission shall make a recommendation to the Board of County Commissioners on whether each proposed amendment should be approved, approved with modifications, or denied based on the criteria in WWCC 14.10.070B(3-5) and WWCC 14.15.070B(3). This hearing should be held in Burbank, possibly at the same time as the Informational Public Meeting (#6).
9. **Presentation of the Planning Commission’s Recommendations** – After the Planning Commission makes recommendations, CDD staff will prepare a Planning Commission resolution for signature by the Chair. This along with minutes from the Planning Commission meeting and other background information is presented by County staff to the Board of County Commissioners. The Commissioners may choose to have a workshop meeting or just proceed with scheduling a public hearing.
10. **Board of County Commissioner’s Public Hearing** – The Board of County Commissioners must have a public hearing on the proposed amendments. This hearing could be held in Burbank if the Commissioners choose to.
11. **Board of County Commissioner’s Decision** – After conducting a public hearing and considering the Planning Commission’s recommendations, the Board will take action to approve, approve with modifications, each of the proposed amendments. This action may occur at the same meeting as the public hearing, or it may happen at a later meeting if additional time to deliberate is needed.
12. **Board of County Commissioner’s Adoption** – Adoption of amendments to the Comprehensive Plan and Development Regulations occurs via Ordinance, which is drafted by Community Development Department staff and the Prosecuting Attorney’s office. This would occur at a BOCC meeting.

COVID-19 Considerations

Items 1 through 6 can be completed virtually, at the current stage of the COVID-19 pandemic. This allows the County to prepare final proposal amendment(s) for consideration and do research, analysis, initial review, and distribution for public and agency comment (in writing).

Steps 7 through 10 are the public outreach and hearing process, which is the final review process. This process typically takes approximately 60 days given the procedural/notification requirements required for two public hearings. These steps should probably be delayed until additional re-opening occurs.

Due to the ongoing pandemic, the County may want to consider additional approaches to allow for public participation to occur in a way that is compliant. This could include a more robust/interactive online presence.

Please let us know if you have any questions regarding the above details. We look forward to working with you on these upcoming projects.

Sincerely,

LDC, INC.



Todd Hall
Planning Manager

CC: Clay White, Director of Planning, LDC, Inc.
Ian Faulds, Planer, LDC, Inc.