

**2021 Preliminary Comprehensive Plan Amendment  
Review and Evaluation Criteria Assessment**

**18.59.020 Preliminary review and evaluation criteria**

A. Prior to City Council action, the Department shall conduct a preliminary review and evaluation of proposed amendments, including rezones, and assess the extent of review that would be required under the State Environmental Policy Act (SEPA). The preliminary review and evaluation shall also include any review by other departments deemed necessary by the Department, and except as provided in OMC [18.58](#) shall be based on the following criteria:

1. Is the proposed amendment consistent with the county-wide planning policies, the Growth Management Act (GMA), other state or federal law, or the Washington Administrative Code?

Application 1 (PW Transportation): Staff believes the proposal is consistent with the countywide planning policies, the GMA, other state and federal laws, and the Washington Administrative Codes.

Application 2 (Log Cabin Road Ext): Staff believes the proposal is potentially consistent with the countywide planning policies, the GMA, other state and federal laws, and the Washington Administrative Codes, because these are broad policies with regional or statewide coverage. The concern is that the proposal is not consistent with the street connectivity policy language in the Comprehensive Plan and is inconsistent with the Regional Transportation Plan. Both of these planning documents are consistent with the countywide planning policies and the GMA.

Application 3 (Council Request): Staff believes the proposal is consistent with the countywide planning policies, the GMA, other state and federal laws, and the Washington Administrative Codes.

2. Would the proposed amendment cause little or no adverse environmental impacts and, is the time required to analyze impacts available within the time frame of the standard annual review process?

Application 1 (PW Transportation): Staff believes the proposal would cause little or no adverse environmental impacts and that any potential impacts can be reviewed within the timeframe allowed for review of annual amendments.

Application 2 (Log Cabin Road Ext): Staff believes the impacts of not building the Log Cabin Road extension between Boulevard Road and Wiggins Road cannot be adequately reviewed within the timeframe allocated for annual amendments. The impacts of not building the connection should be evaluated, including the use of a traffic model to demonstrate local and regional traffic implications with and without this street connection. The modeling would demonstrate the impacts to other streets of not building the Log Cabin extension. In lieu of a street connection, alternative street improvements may need to be built to accommodate planned growth. The City will also need to examine potential impacts for the provision of water or sewer infrastructure if this public right-of-way is not available.

Application 3 (Council Request): Staff believes the proposal would cause little or no adverse environmental impacts and that any potential impacts can be reviewed within the timeframe allowed for review of annual amendments.

3. Is sufficient analysis completed to determine any need for additional capital improvements and revenues to maintain level-of-service, and is the time required for this analysis available within the time frame for this annual review process?

Application 1 (PW Transportation): Staff believes there is sufficient analysis to assess capital improvements and revenues associated with this request. This is because of the recent work completed to prepare the draft Transportation Master Plan, which is near completion.

Application 2 (Log Cabin Road Ext): Staff believes more analysis is needed to understand the implications of not building the Log Cabin Extension. Additional transportation capital improvements and associated revenues could be needed to accommodate population growth if this street connection is not constructed. Some of that could be offset by savings of not constructing the street connection, but the difference of those improvements is not known. Staff does not believe the timeframe associated with annual Comprehensive Plan amendments is adequate to complete that analysis.

Application 3 (Council Request): Staff does not believe these proposed amendments would result in impacts to the need for capital improvements or revenues beyond those efforts to better address equity and inclusion that are already underway.

4. Can the proposed amendment be considered now without conflicting with some other Comprehensive Plan established timeline?

Application 1 (PW Transportation): Staff believes the proposed amendment can be considered now without conflicting with other timelines established in the Comprehensive Plan.

Application 2 (Log Cabin Road Ext): Staff believes the proposed amendment can be considered now without conflicting with other timelines established in the Comprehensive Plan. However, the results of that review *may* identify timeline conflicts with infrastructure investments planned in the out-years of the Capital Facilities Plans or the functional/master plans for utilities that have not yet been considered. This is because those master plans were developed based on the Future Land Use Map and planned transportation improvements identified in the Comprehensive Plan.

Application 3 (Council Request): Staff believes the proposed amendment can be considered now without conflicting with other timelines established in the Comprehensive Plan.

5. Can the proposed amendment be acted on without significant other amendments or revisions not anticipated by the proponents and is the time required for processing those amendments or revisions available within the time frame of this annual review process?

Application 1 (PW Transportation): Staff believes the proposed amendment can be acted on without significant other amendments or revisions not anticipated by the proponents and within the timeframe anticipated for annual amendments.

Application 2 (Log Cabin Road Ext): Staff does not believe there would be adequate time within the annual amendments timeframe to assess the amendment and the resulting transportation system improvements that would be needed elsewhere as well as the related amendments that would be needed to the 20-year needs identified in the Capital Facilities Plan. However, these issues could be addressed more fully in the more robust process planned for the City's upcoming Periodic Update of the Comprehensive Plan, as required under the Growth Management Act. The City's Periodic Update is due to be completed by June of 2025. The process is expected to be phased over a multi-year timeline and is anticipated to begin in 2022.

Application 3 (Council Request): Staff believes the proposed amendment can be acted on without significant other amendments or revisions not anticipated by the proponents and within the timeframe anticipated for annual amendments.

6. If the proposed amendment was previously reviewed, ruled upon or rejected, has the applicant identified reasons to review the proposed amendment again?

Application 1 (PW Transportation): N/A

Application 2 (Log Cabin Road Ext): N/A

Application 3 (Council Request): N/A

- B. If the Department determines that the answer to any of the above questions is no, it may recommend to the City Council that the proposed amendment or revision not be further processed in the current amendment review cycle. Upon direction from City Council, Department staff will inform those whose proposed amendments or revisions will not be considered because (a) impact analysis beyond the scope of the amendment process is needed; (b) the request does not meet preliminary criteria; or (c) likelihood of inclusion of the proposal in a department's work program. Proponents may resubmit proposals to the department at any time, subject to the timelines contained in this chapter.

**Staff Recommendations for each proposal:**

Application 1 (PW Transportation): Advance to the final docket, invite to apply for a Final Comprehensive Plan Amendment application.

Application 2 (Log Cabin Road Ext): Do not advance to the final docket but instead direct the City to consider this amendment as part of the Periodic Update of the Comprehensive Plan.

Application 3 (Council Request): Advance to the final docket, invite to apply for a Final Comprehensive Plan Amendment application.