



## City of Olympia, WA Comprehensive Plan Update - Olympia Planning Commission (OPC) Final Draft City Manager and Staff Recommendations

Staff reviewed the Comprehensive Plan in detail and identified 14 policies with staff recommendations that differ from the Planning Commission draft.

One of those policies, Item #5 below (Action Plan Process), includes a recommendation from the Land Use and Environment Committee that responsibility for Comprehensive Plan Implementation/Action Plan Process rest directly with the City Council through the Council's Land Use and Environment Committee instead of the Planning Commission. The intent is to place responsibility for Comprehensive Plan implementation at the highest policy level with a community-wide focus.

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### Transportation Policies

#### 1. Speed Limits

##### **OPC Recommendation in Draft Plan:**

The OPC recommends lowering speed limits to 20 mph on local access streets and in the City Center.

*PT1.3 Establish speed limits to create a safe environment for pedestrians and bicyclists, while maintaining motor vehicle traffic flow. Speed limits shall not exceed 35 miles per hour on arterial and major collector streets, 25 miles per hour on neighborhood collectors, and 20 miles per hour on local access streets, and in the City Center.*

##### **Proposed City Manager Recommendation:**

Staff recommends continuing with a 25 mph speed limit on local access streets, with provisions to establish 20 mph speed limits for select conditions.

*PT1.3 Establish speed limits to create a safe environment for pedestrians and bicyclists, while maintaining motor vehicle traffic flow. Speed limits shall not exceed 35 miles per hour on arterial and major collector streets, and 25 miles per hour on neighborhood collectors and local access streets, and in the City Center. Provisions are allowed to establish 20 mph speed limits for select conditions and as allowed by state law.*

##### **Discussion:**

Speed limits on local access streets (small neighborhood streets) and in the City Center are 25 mph. On certain streets in school zones and near playgrounds, 20 mph can be posted. While a 20 mph speed limit may influence some people to drive slower, if dependent on enforcement, it is unrealistic that these speeds will be achieved. Street design and physical features that create "friction" influence speeds more than speed limits.

Currently, unless otherwise posted, the speed limit on City streets is 25 mph. It would be a major work effort and cost to add and replace signs indicating the 20 mph speed limit. Having all local access streets at 20 mph would de-emphasize the need for slower speeds in school zones and near playgrounds. 20 mph speed limits would be more effective in very specific and limited circumstances, like school zones.

Vehicle speeds are a major influence on the safety and comfort for bicycling and walking. Speeds should be evaluated on both major and local access streets. Considerations should include the function of the street, as well as the safety of bicyclists and pedestrians.

## **2. Street Connectivity**

### ***OPC Recommendation in Draft Plan:***

The OPC recommends adding a policy to evaluate all street connections.

*PT4.21 Pursue all street connections. When a street connection is proposed, the developer, City, or County will analyze how not making the street connection will impact the street network. This information will be shared with the neighborhood and other stakeholders before any final decision is made. At a minimum, this evaluation will include:*

- *Impacts on directness of travel for pedestrians, bicyclists, transit users, and motorists*
- *Impacts on directness of travel for emergency-, public-, and commercial-service vehicles*
- *An assessment of travel patterns of the larger neighborhood area*
- *An assessment of traffic volumes at the connection and at major intersections in the larger neighborhood area*
- *Identification of major topographical barriers or environmental constraints that make a connection infeasible*
- *Involve the neighborhood and other stakeholders in the identification of potential mitigation measures for the new connection*
- *Bicycle and pedestrian safety*
- *Noise impacts and air pollution*
- *Likelihood of diverting significant cross-town arterial traffic on to local neighborhood streets*
- *Effectiveness of proposed traffic-calming measures*

### ***Proposed City Manager Recommendation:***

Staff recommends adding a policy to require an analysis only when a street connection is opposed.

*PT4.21 Pursue all street connections. If a street connection is opposed, the developer or the City will analyze how the street connection will impact the street network. This information will be shared with stakeholders before any final decision is made. At a minimum, this evaluation will include:*

- *Impacts on directness of travel for pedestrians, bicyclists, transit users, and motorists*
- *Impacts on directness of travel for emergency-, public-, and commercial-service vehicles*
- *An assessment of travel patterns of the larger neighborhood area*

- *An assessment of traffic volumes at the connection and at major intersections in the larger neighborhood area*
- *Identification of major topographical barriers or environmental constraints that make a connection infeasible*
- *Identification of potential mitigation measures for the new connection, with the involvement of the neighborhood*

**Discussion:**

Street connectivity helps to achieve transportation safety and efficiency, and increase mode choice. A connected grid of streets allows short, direct route options for walking, biking, driving, and to access transit. A connected street grid also provides better access for emergency and commercial vehicles.

Olympia has not been able to build many planned street connections. Staff proposes street connectivity policy language that all street connections have value, and provides guidance about when to make exceptions to street connectivity policy. The goal is to make fewer exceptions to policy and to base the decision on objective measures. These measures gauge the impact of not making the connection on the transportation system.

The OPC’s recommendation to evaluate all street connections undermines the base assumption that all street connections have value and will require a great deal of City staff resources.

**3. Connection of Park Drive SW**

***OPC Recommendation in Draft Plan:***

The OPC recommends the future connection of Park Drive as a bike, pedestrian and emergency access connection only. Text in Appendix A reads:

*“If at some future time, Kaiser Road is extended to Black Lake Boulevard, extension of Park Drive to Kaiser Road may be considered in order to provide access for bicycles, pedestrians, and emergency vehicles.”*

The proposal to limit the Park Drive connection to bike, pedestrian and emergency vehicle access would also need to be reflected in the updated Comprehensive Plan project list and the Transportation 2030–Westside map.

***Proposed City Manager Recommendation:***

Staff recommends the future connection at Park Drive be a full-street connection providing access for walking, biking, and motor vehicles. Text in Appendix A would read:

*“A neighborhood collector street connection is also planned between Kaiser Road and Park Drive. Both connections add needed connectivity to the area, serving different functions in the street network. The neighborhood collector connection between Kaiser Road to Park Drive will not be a substitute for the major collector connection between Kaiser Road and Black Lake Boulevard. The Park Drive connection should not be built until the Kaiser Road connection is in place.”*

**Discussion:**

Future street connections are planned from Park Drive to Kaiser Road, and Kaiser Road to Black Lake Boulevard. These street connections are needed for transportation safety and efficiency in this area. Both streets should be constructed together, or Kaiser Road, the larger street, should be connected first so that traffic is not directed to Park Drive.

Park Drive currently does not have sidewalks. When Park Drive is made a full-street connection, traffic-calming devices and sidewalk would be appropriate modifications to the street. When changed from a dead-end street to a connected street, a pedestrian walking facility (sidewalk or shoulder) would be built to improve pedestrian safety.

Eliminating vehicle access at Park Drive will result in fewer route options for drivers when construction or emergencies occur, and longer routes for motor vehicle drivers in the vicinity of Park Drive.

**4. Alleys**

**OPC Recommendation in Draft Plan:**

The OPC recommends requiring alleys in new development

- *PT3.4 Require alleys and retain alleys as public right-of-way.*
- *PT3.5 Require alleys behind lots fronting on arterials and collectors, so that houses or businesses can face the street, sidewalks are continuous, and vehicles can access properties from behind.*

**Proposed City Manager Recommendation:**

Staff recommends that alleys be encouraged, but not required.

- *PT3.4 Encourage alleys and retain alleys as public right-of-way.*
- *PT3.5 Encourage alleys behind lots fronting on arterials and collectors, so that houses or businesses can face the street, sidewalks are continuous, and vehicles can access properties from behind.*

**Discussion:**

Alleys contribute to more access and mobility in our transportation system. Alleys contribute to improved urban form, by minimizing the need for driveways at the front of a lot. However, more alleys would be difficult for the City to maintain. Funding is not in place to maintain the alleys we already have. Because alleys are typically paved or compacted gravel, more alleys will result in more impervious surfaces, which will result in rainwater runoff that must be treated and/or conveyed off site.

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## Public Participation Policies

### 5. Action Plan Process

#### ***OPC Recommendation in Draft Plan:***

PP1.1 and PP1.2 in the Public Participation and Partners Chapter in the draft Comprehensive Plan describe specific roles for staff, Council, and the Commission in the development and ongoing management of the Implementation Strategy (Action Plan). In PP1.1, the Council and Commission are charged with identifying actions with a special emphasis on the priorities of advisory groups. PP1.2 specifically outlines how the Plan will be managed and updated, including the creation of a committee, the make-up of that committee, and what bodies the committee will report to on an annual basis.

#### ***Proposed City Manager Recommendation:***

Staff recommends that proposed policies PP1.1 and PP1.2 be replaced with one policy that identifies that there will be an Implementation Strategy. However, the details regarding how it will be developed and maintained would not be specified .

- Replace PP1.1 with: *PP 1.1 Engage partners in the development and regular updating of an implementation strategy to fulfill Comprehensive Plan goals and policies. This strategy will include a monitoring and reporting process.*
- Delete PP1.2.

#### ***Discussion:***

The intent of adding the Implementation Strategy to scope of the update was to develop a tool for identifying and prioritizing specific actions for carrying out the goals and policies in the Comprehensive Plan. Subsequently, it allowed the staff writing team to draft the update with a focus on goal and policy-level language. Policies that were more akin to methods of implementation were removed and reserved for possible inclusion in a Strategy. PP1.1 and PP1.2 are highly prescriptive methods for public participation in implementation and performance measurement.

Secondly, during initial phases of discussions with LUEC, they determined in September 2012 that LUEC (i.e. Council) is the most appropriate advisory body to provide staff with strategic direction on development of the Strategy, as opposed to the Commission. This was because the Strategy is a community-wide document that will help guide community-wide priorities for implementation, and is more in line with the role of Council. This allows for the Strategy design, performance measures, and ongoing maintenance to remain adaptive and responsive to feedback from LUEC, all advisory groups, and community members.

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## Land Use and Urban Design Policies

### 6. Re-Zoning Criteria for Low Density Neighborhoods Land Use Designation

#### **OPC Recommendation in Draft Plan:**

The Land Use and Urban Design chapter text includes five detailed criteria that proposed rezones would be required to meet (pages 56-57 of the OPC Final Draft Plan).

#### **Proposed City Manager Recommendation:**

Revise the text as follows to refer to topics that should be addressed in future development code amendments that govern rezones:

*“Proposed rezones shall meet criteria to be adopted into the Olympia Municipal Code that address:*

- 1. Consistency with the comprehensive plan.*
- 2. Consistency with the city’s development regulations that implement the comprehensive plan.*
- 3. Consideration of adjoining zoning districts*
- 4. Adequacy of infrastructure in light of development potential of the proposed zoning.”*

#### **Discussion:**

The current comprehensive plan includes 34 categories of land use designations, each of which corresponds directly with a single zoning district that implements it. A request for a change in zoning district also required a comprehensive plan amendment.

The Draft Plan’s Future Land Use Map aggregates the 34 land use designations into 15 categories, without recommending any changes to the number of zoning districts. As a result, most of the land use categories will have multiple zoning districts that could implement them. Requests from property owners for changes to the zoning for their property would be possible without also requiring a comprehensive plan amendment. This could lead to an increase in requests from property owners for rezones.

The city code contains decision criteria for rezone requests (OMC 18.59.050). However, it is fairly general and the OPC recommends additional criteria to guide future rezone requests. Staff agrees, but recommends the detailed criteria be contained in the city code, with general guidance for developing that criteria in the comprehensive plan.

### 7. High Density Neighborhoods Minimum Density Requirement

#### **OPC Recommendation in Draft Plan:**

*High Density Neighborhoods are multi-family residential, commercial and mixed use neighborhoods with densities of at least 25 dwelling units per acre. Specific zoning may provide for densities higher than 25 units per acre.*

#### **Proposed City Manager Recommendation:**

*High Density Neighborhoods are multi-family residential, commercial and mixed use neighborhoods with a goal of densities of at least 25 dwelling units per acre for single-use*

*residential developments. Specific zoning may provide for densities higher than 25 units per acre, but not less than 15 units per acre.*

***Discussion:***

High-density Neighborhood overlay zones are recommended in the Draft Plan for three areas: Downtown Olympia; Pacific Ave/Martin Way/Lilly Road triangle; and the Capital Mall vicinity. The overlay would concentrate high-density residential mixed with commercial uses, which would directly serve the residents and allow people to meet their daily needs without traveling outside their neighborhoods. These neighborhoods would transition from their current automobile orientation to becoming more walkable.

Staff concern centers on requiring a minimum density of 25 units per acre. While a few developments in the city have been built at that density (e.g. Boardwalk Apartments downtown), the Olympia market has primarily supported multi-family development at a lesser density (approximately 14-18 units per acre). Restricting residential development to at least 25 units per acre may preclude the type of multi-family development that is currently supported by the market. Staff recommendation would retain that higher density as a goal, but provide flexibility for a broader range of residential development to locate in these neighborhoods.

**8. Urban Corridors**

***OPC Recommendation in Draft Plan:***

The OPC recommends:

- removing sections of the Urban Corridor on Capitol Boulevard south of I-5; and
- reducing the width of Urban Corridors on East 4<sup>th</sup> and State Avenues, and Harrison Avenue (from ¼ mile to about one-lot deep).

***Proposed City Manager Recommendation:***

Staff supports removal of Capitol Boulevard but recommends no change to the width of the Urban Corridor along Harrison, Fourth and State

***Discussion:***

Urban Corridors are an integrated transportation and land use concept initially designated in 1994 by Olympia, Lacey, Tumwater and Thurston County. They are major arterials with high-density mixed land uses ¼ mile on either side. Along these corridors, the compact land uses are supported by a multimodal transportation system, including high-quality transit service. Urban Corridors are key to the region's strategy to avoid sprawl by providing an appealing housing alternative for people who want to live in an attractive, walkable, urban environment close to transit, work, services and shopping.

Olympia's current Plan describes half-mile wide mixed use corridors in these areas, but designated only the lots along the main street for commercial use. The remaining portions of the corridor were designated for low to medium density housing, with a target of 7 units per acre. The staff recommendation reaffirms the 7 units per acre target, and allows for mixed commercial/residential uses throughout the corridor subject to 'transition policies.'

Residents of the Capitol Boulevard area opposed this proposal and strongly requested eliminating the urban corridor designation in their area. Although in their March, 2013, action OPC initially supported

staff's proposal, ultimately OPC went beyond the request of the Capitol Boulevard residents' proposal and recommended reducing the urban corridors along 4<sup>th</sup>/State and Harrison corridors, as well.

Reducing the size of these corridors diminishes the City's commitment to achieving their long-term vision. The reduction to areas designated as Urban Corridors will minimize commercial uses in these corridors. Without the commercial uses, the transit system is not optimized to its fullest potential. Without the commercial uses as envisioned, the corridors will not function as areas where people can work, as well as access shopping and other services within their neighborhood.

Maintaining the Urban Corridors for the ¼ mile width on either side of these arterials provides flexibility in achieving the region's vision. Specific zoning can be refined to address the unique characteristics of districts along these corridors, while maintaining the envisioned mix of land uses.

## **9. Design Review Jurisdiction**

### ***OPC Recommendation in Draft Plan:***

Proposed policy PL6.1 requires residential and commercial development adjacent to freeways and public streets be subject to design review process.

### ***Proposed City Manager Recommendation:***

Delete residential from policy PL6.1.

### ***Discussion:***

Olympia's existing design review process applies to projects within designated design review districts, as well as certain development in other limited circumstances. The staff-recommended Draft Plan included a policy to extend design review to all commercial development adjacent to freeways or public streets. OPC further extended the recommendation to include all residential development adjacent to freeways and public streets. This would include virtually all development in the City of Olympia. Staff is concerned that this would significantly increase costs to the City and applicants, while expanding the permitting process for developments that have raised little to no concerns in the community (e.g., single-family homes).

## **10. View Protection Goal and Policies**

### ***OPC Recommendation in Draft Plan:***

The OPC supported a policy amendment proposed by staff of protecting views from designated public points instead of from street corridors, and expanded this proposal to be a goal with additional policies. Two of these would constrain implementation methods:

*PL8.1 Implement public processes, including the use of Olympia's digital simulation software, to identify important landmark views and observation points.*

*PL8.2 Use Olympia's digital simulation software to identify view planes and sightline heights between the landmark view and observation point.*



**Proposed City Manager Recommendation:**

Staff recommends that the Plan not specifically call for use of specific analysis methods such as ‘digital simulation software,’ view planes and sightline heights. These two policies should be consolidated into a single policy:

*Through a public process, identify important landmark views and observation points and appropriate methods (e.g., visual simulations) for preserving valued aspects of these public views.*

**Discussion:**

One of the guiding principles of this Comprehensive Plan update was to provide flexibility in implementing the plan. As a result staff removed many such provisions from the Plan, with the intent of bringing options forward as part of the complementary implementation strategy. As recommended by OPC, proposed new policies 8.1 and 8.2 would unnecessarily constrain the City to just one of the many techniques for analyzing scenic views. In staff’s opinion, it is overly specific and might prevent the City from utilizing new or other better methods and technologies

**11. Urban Green Space and Tree Canopy**

**OPC Recommendation in Draft Plan:**

The Planning Commission drafted and recommended policy PL7.4 with the intent to increase green space and tree canopy by specific methods and measures: area per capita of urban green space and tree canopy-to-area ratio within each neighborhood.

**Proposed City Manager Recommendation:**

Staff is recommending that the policy be revised to reflect a target to increase the total acreage of preserved urban green space that currently exists (i.e. no net loss of urban green space), rather than a target based on increasing a ratio of open space to population. A separate policy in the Natural Environment Chapter already addresses tree canopy: *PN3.2 Measure the tree canopy and set a city-wide target for increasing it through tree preservation and planting*

Revise policy PL7.4 to state:

*PL7.4 Increase the availability of urban green space throughout the community.*

**Discussion:**

The primary concerns of staff are that it is likely not possible to maintain the current ratio of urban green space to population as population increases, and that tree canopy shall be increased to a target ratio at the neighborhood scale as opposed to citywide.

Using GIS, staff has already determined that approximately 25% of the city is currently set aside as urban green space. “Set aside” is meant that the land is limited in its ability to be developed and very likely to remain as open space for the foreseeable future. Examples include parks, critical areas, and privately owned open space, such as tree tracts or village greens.

The Parks, Arts, and Recreation Department currently manages 765 acres of public open space, which equates to an impressive 11.62 acres per 1,000 residents (in addition to approximately 200 acres of

parks with a “Neighborhood” or “Community” classification). Staff has determined that with the current population growth projections, to maintain the existing ratio of open space, 142 acres of additional land would need to be purchased every ten years (pg. 101-102, 2010 Parks, Arts, and Recreation Plan).

If the City were to attempt to increase urban green space as population increases, implementation would need to include some combination of the following tools:

- Additional revenue for purchase of city-owned open space;
- Enhanced regulation for requiring open space as an element of new development;
- Increased open space impact fees; or
- Other conservation tools, such as land banks or conservation easements.

Secondly, it is common practice in urban forestry to measure tree canopy, and having a tree canopy goal is an effective way to ensure progress towards a healthy and diverse urban forest. To that end, staff drafted a policy in the Natural Environment Chapter that addresses tree canopy: *PN3.2 Measure the tree canopy and set a city-wide target for increasing it through tree preservation and planting*. Policy PN3.2 sufficiently addresses tree canopy; reserve determination of an appropriate canopy coverage goal and scale at which to measure progress for the Implementation Strategy.

Unlike the Commission’s recommended policy, PN3.2 purposely leaves determination of the target as an action for implementation, and directs canopy to be measured city-wide. Good urban forest managers are always aware of the need for equity citywide; however, implementation on a neighborhood scale limits flexibility to plant trees where appropriate and use resources efficiently citywide. This is especially true within an urban growth area, where both increasing density and tree canopy need to balance.

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## Public Services Policies

### 12. Disaster Planning (Subduction Earthquake Policies)

#### **OPC Recommendation in Draft Plan:**

Adopt a new set of policies addressing the risk of a 'Cascadia subduction zone earthquake,' specifically:

- *Policy S13.9: Educate citizens about the possibility, and potential impacts, of a Cascadia subduction zone earthquake and actions they can take to prepare for such an event.*
- *Policy S13.10: Address the severe and extended impacts of a Cascadia subduction zone earthquake in the City's emergency response plans and preparations.*
- *Policy S13.11: Continue to gather best available information on the impacts of a Cascadia subduction zone earthquake, including the potential magnitude and impacts of vertical movements and tsunamis*

#### **Proposed City Manager Recommendation:**

Do not adopt the language in the recommendations; instead, continue policy of coordinating City's efforts related to disaster risks through the accepted standard of all-hazard formatting in cooperation with the region's other Emergency Management programs. Revise policy S13.11 to state:

*Continue to gather best available information on earthquakes, and the potential magnitude and impacts of vertical movement, while educating citizens on the impacts of all hazards.*

#### **Discussion:**

The City of Olympia coordinates with neighboring jurisdictions in preparing and updating 'Resilient Washington State – A Framework for Minimizing Loss and Improving Statewide Recovery after an Earthquake,' a 'Natural Hazards Mitigation Plan for the Thurston Region' and the City's own 'Comprehensive Emergency Management Plan.' In implementing the former, the State of Washington provides information to all local jurisdictions regarding certain development standards, such as seismic-related elements of the building code. The latter two plans address all manner of hazards, such as fires, floods and earthquakes, and form the foundation for the City's efforts to minimize and respond to damage resulting from such events. Direction from the State is to plan in an all hazard format as is the standard of the industry.

The nature of a subduction zone earthquake including the potential to generate a tsunami (tidal wave), if occurring in the vicinity of Olympia, leads some to a conclusion that it would result in catastrophic damage both in Olympia and a much wider region. Projected effects on Olympia differ depending on models used and the inclusion of tsunami damage is highly speculative. A subduction zone earthquake by definition would have to occur along the subduction zone that is off the Washington Coast. Although such an earthquake may cause a tsunami, such a wave would be in the Pacific Ocean and have to travel around the northwest corner of the state and down the Puget Sound before reaching Olympia. This travel around significant landforms would significantly dissipate the destructive energy of a wave. Like all earthquakes, the timing and scale of such an earthquake is unpredictable. However, research

indicates that there is about a .2% chance of such an earthquake in the western Washington area in any given year.

The possibility of a subduction zone earthquake is just one of the many types of natural hazards addressed by federal, state, and local emergency and disaster planning. While additional focus on this specific risk could lead to reduction in damage and better response were such an event to occur, it could also result in diverting attention and resources away from preparation for other more likely hazards. Further, given the scale of this particular type of disaster it is unlikely that the City of Olympia working alone could make a significant difference. Instead, Olympia's experience has demonstrated that multi-jurisdictional coordinated all hazard emergency management, including education and preparation for all types of hazards, is more effective than localized focus on a single risk.

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## Utilities Policies

### **13. Locating underground utilities**

#### ***OPC Recommendation in Draft Plan:***

Draft policy PU3.6 states that utilities will be grouped, and to include in the Engineering Design and Development Standards (EDDS) a guidance drawing with street trees and public and private utilities co-located in the public right-of-way.

#### ***Proposed City Manager Recommendation:***

Revise policy PU3.6 as follows:

*Locate public and private utilities in public rights-of-way and/or easements on private property in a manner to facilitate safe and efficient operation, maintenance and repair. Provide a guidance drawing within the Engineering Design and Development Standards that shows how and where public and private utilities should be located.*

#### ***Discussion:***

If adopted, the proposed policy conflicts with the City's current practice of allowing for utilities in the right-of-way, but also in an easement on private property. The policy states that public and private utilities should be co-located within the public right-of-way only.

The EDDS require all new utilities to be installed underground (see 3.090(B)). A Standard Utilities Location Schematic (4-44) demonstrates that utilities be located under the street surface in right-of-way or in a section of easement adjacent to the sidewalk on private property.

Additionally, the policy emphasizes grouping underground utilities together, so would necessitate a revised schematic with additional details regarding *how* and *where* to place underground utilities. Lastly, the proposed policy elevates accommodating street trees—particularly an issue in areas where a planting strip is not a required element of the frontage improvements. This is also in alignment with new policy language in the Natural Environment Chapter to provide new trees with adequate conditions for healthy growth.

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## Public Health, Arts, Parks and Recreation Policies

### **14. Parks Maintenance and Operations Funding Consideration**

#### ***OPC Recommendation in Draft Plan:***

Draft policy PR6.5 states:

*Ensure adequate park maintenance and operation funding before new facilities are developed.*

#### ***Proposed City Manager Recommendation:***

Revise Policy 6.5 to read:

*Ensure adequate maintenance and operation funding before new park facilities are acquired and developed.*

Also, in the chapter-concluding section titled 'For More Information', the statement, "The Parks, Arts & Recreation Plan contains a detailed list of proposed projects and programs for the next 10 years" should be deleted.

#### ***Discussion:***

The proposed Public Health, Arts, Parks and Recreation chapter should be revised to better reflect the planning process. Specifically, policy PL6.5 does not reflect that consideration of adequate maintenance and operation funding occurs before new park facilities are acquired.

The existing Parks, Arts and Recreation Plan is updated every five years, and the next scheduled update will begin in the next year. The reference to the current list of proposed projects in that plan is dated. For clarity, it should be deleted from the draft comprehensive plan.