

## Comments and Questions

### FOR THE BACHTOLD ANNEXATION

Specifically related to Walla Walla's Comprehensive 2040 Plan

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8/7/19

I have personally read through the city's policy and land use planning documents and the Bachtold annex package and have the following comments. In short, this appears to be a recipe for disaster and the burden should be to show compliance of the proposed plan with the cities priorities for growth.

My comments and questions for the city's careful consideration:

1. *"An important part of Walla Walla's identity are the views of the surrounding countryside and the quick transition from urban conditions to the surrounding rural landscapes. This urban rural transition is what gives the city the visual image of a unique oasis in the Palouse, which has grown more important with the emergence of wine tourism. The key to maintaining this urban/rural transition is careful land use planning."* -CC-10 How is the Bachtold Annexation as proposed complying with the previous from the Comprehensive 2040 Plan regarding the Urban/Rural Edge. Putting a sprawling dense cheap housing suburbia on the southern, and one of the if not the most beautiful edges of town should be justified in light of its effect on the view and the damage to the Urban/Rural Edge. Especially when the development is not carefully planned as a transition.
2. *"Maintain a visually strong edge between urban areas within the Urban Growth Boundary and those rural areas outside the Boundary. ' Provide parks and open spaces in new development at city's perimeter ' Maintain expansive views of mountains and open spaces"* CC-11 How can it be said that the Bachtold Annexation as proposed is complying with the previous from the Comprehensive 2040 Plan: URBAN/RURAL EDGE? It appears in the plans that parks are a bare minimum and in some cases just narrow strips within the community and not something useful to the larger city or with consideration for further possible growth.
3. *VALUABLE CIVIC OPEN SPACES AND RESOURCES ' Retain and enhance noted open space resources that are highly valued by community members* CC-11 How will the city address the fact that there is an online petition numbering in the thousands of signatures showing plenty of evidence that this area is not going to be enhanced.
4. CC Policy 1.1 *Use the land use code and design guidelines to ensure that new development reinforces and is guided by the character of existing land use patterns and the architectural attributes of the applicable character areas*
5. CC Policy 2.1 *Enhance and celebrate the distinct and unique character of Walla Walla's neighborhoods, as defined by Character Areas in this element. Ensure that growth and change within neighborhoods builds on their positive architectural and urban design attributes.* How is this sprawl growth of tiny lots within the larger Cottonwood neighborhood building on positive urban design attributes or enhancing this neighborhood in any way. Ask the neighbors and they will mostly say its not!

6. *Community Character Goal 3: "There is a clear and attractive transition from the urban/small town character in the city and the rural character of the surrounding region."* This will ruin a current attractive transition by cramming in hundreds of homes. Larger lots may be an option, but not urban sprawl. How is this goal being considered?
7. *CC Policy 3.1 "Work with regional partners to maintain the rural character of lands near the city's perimeter and create an attractive and prominent visual edge between city residential areas and the surrounding agricultural lands and open space."* Have the regional partner's been included in this planning and decision making process? How can 400 homes crammed in this tiny area create an attractive visual edge?
8. *CC Policy 3.2 "Identify and protect important viewsheds, particularly views of the Blue Mountains, through regulations."* Has this plan been evaluated for how his neighborhood will impact views of the Blue Mountains to surrounding community members as it rises over a hill.
9. *CC Policy 5.3 "Create a tree planting program to preserve, restore, and enhance the tree canopy. Include planting requirements for each new development or redevelopment."* This is a cookie cutter development with no apparent thought put into the enhancement of the city. In fact, extensive canopy rising over the hill in the area in particular will do much harm to the views of surrounding homes. Has the proposed tree canopy been evaluated for compliance with planting requirements for new development?
10. *2017 City of Walla Walla Population and Land Capacity Analysis in Appendix A. "The analysis identifies the potential for approximately 3,576 housing units within Walla Walla city limits and the UGA on vacant or redevelopable lands. At an average household size of 2.43 persons per household, this represents a capacity for approximately 8,690 people "* LU-2 If this is truly the case, then there are thousands of other housing unit possibilities within the city pre-existing. Expansion of these 400 or so units is unnecessary according to this analysis if work is put into developing other areas. Have other options been exhausted for providing these 400 homes in other potential areas rather than a cookie cutter urban sprawl not within the character of this part of town?
11. *"An opportunity is to encourage new population and commercial growth along the Myra Road corridor. Focusing development along existing Valley Transit lines that link the City and College Place promotes a relatively compact urbanized area with homes, jobs, and shopping."* LU-4 This development is not taking advantage of existing opportunity as described above and creates more problems rather takes advantage of existing Valley Transit lines. Has this opportunity been evaluated and options in this regard exhausted first along existing transit lines and this one as mentioned particularly?

12. *Walla Walla desires to retain its community character. This means planning ahead for growth and its impacts so that Walla Walla is a great place to live for all residents.* LU-5 This development is an example of just the opposite. It is straight up unplanned growth without regard to the unintended consequences to the surrounding streets and neighborhoods. Where were the extensive forward planning efforts including studies of all impacts to this precious area.
13. *"Land Use Goal 1 Walla Walla grows in a responsible way that maintains or improves the quality of life for its residents."* LU-5 Has this plan been evaluated for how it will meet this goal? If so, how will this development IMPROVE the quality of life for existing residents in the area?
14. *LU Policy 1.1 "Accommodate new residential and commercial development in areas with available infrastructure and services."* FAILS this Policy Goal as there is little infrastructure and services existing in the part of town. Has this policy goal been met by the plan, it appears not?
15. *LU Policy 1.3 "Encourage infill development that provides additional housing within the city."* As stated above in comment 10, there are plenty of infill opportunities to fill this number of houses. This policy would be the direct opposite of this development plan. Why is this plan being considered if the policy is to encourage infill development?
16. *LU Policy 4.1 "Balance commercial, industrial, and residential development with the conservation of natural resources and open space by directing growth to areas already served by infrastructure."* This development is not served by existing infrastructure. Other areas that meet this policy are available for infill. How can this development be considered well planned if it fails this policy?
17. *LU Policy 1.8 "Encourage new population and commercial growth in the north and northwest portions of the urban growth area."* This development is completely in the opposite direction of the policy being in the South and Southeast area of town.
18. *LU Policy 4.4 "Ensure that new subdivisions and housing development retains natural qualities including topography, natural features, and native vegetation to minimize impacts to the surrounding ecosystem. Retaining or restoring riparian woody vegetation should be a priority."* This development is a classic case of urban sprawl with no apparent regard to this policy. How can this plan be approved with disregard for this policy?
19. *LU Policy 5.2 "Ensure that new subdivisions and housing are designed to accommodate pedestrian and bicycle access within the development and to nearby community facilities and amenities such as schools, parks, shopping areas, transit corridors, and employment centers."* This development

violates this policy. There is apparently little to no thought being put into these priorities. How can this plan be approved with disregard for this policy?

20. *LU Policy 5.3 "Develop a citywide network of open space and recreation facilities proximate to all residential neighborhoods."* Has the city evaluated the domino impacts due to this development? What is the cities plan for open space and recreation facilities to serve this new sprawling populated development? If existing are considered, which ones?
21. *LU Policy 5.4 "Ensure that new subdivisions maximize green space and common areas to allow opportunities for health and recreation."* This development plan appears to hilariously minimize the green space to whatever the bare standard is. Quite the contrary to a maximum green space and common access areas, maximizing dollars appears the goal against the intent of this policy. How can the plan be approved with this policy violating the requirement to maximize green space?
22. *"The quality and availability of housing is an important part of making Walla Walla a great place to live." H-15* According to our policies and goals, Quality is just as important as availability! This development puts mass cheaply built houses stacked with a concern for maximum profit versus a compliance with this policy. How can the development plan be allowed if the quality of the housing will be considered unimportant?
23. *H Policy 2.6 "Locate new housing near transportation and community facilities to allow seniors to age in place." H-16* This new development is not near transportation or community facilities and in violation of this policy. How can this plan be allowed to proceed without a plan in place to address this policy?
24. *"However, additional projected growth in the south region of the city will require further parklands in this area. Careful consideration must be taken to acquire land early as open space will be difficult to obtain." PR* How has the city addressed this Land Use policy concern? What land nearby will be acquired if not this land? Why is the city not developing this area as a park in this UGA instead of developing it into a heavily urban area based on this level of scarcity and difficulty to obtain land?
25. *"Maintaining high quality parks and recreation facilities is a priority for the Parks and Recreation Department, but funding basic improvements and future development has been a struggle." PR-4* If the policy is to maintain high quality parks and recreation facilities, but funding basic improvement is a struggle, then why create the need for additional burden on the city by expanding its borders instead of infilling? How has this concern been addressed?

26. *PR Policy 1.1 "Acquire future parklands in urban growth areas to ensure that ample open space and recreation areas are available."* What land has been acquired for this purpose, especially on this south side of town listed as a priority? (see reference in comment 24 above)
27. *PR Policy 1.3 "Provide adequate funding to support new parks, recreation programs, and urban forestry programs and to maintain the existing facilities"* How is the city planning to pay for new facilities required for this development in the south part of town if maintaining in city limits is already a problem?
28. *"New/modified private development projects are required to maintain stormwater runoff at pre-development rates; excess stormwater must be collected, retained and infiltrated on site."* The plans do not show stormwater being collected, retained and infiltrated on site. How will this be addressed?
29. *TP-7 "Fern and Abbot is a top 10 crash intersection" This intersection is already Top 10, what is being done now that the traffic will be dramatically increased?*
30. *TP-10 "It is difficult to provide urban services to the portion of the UGA south of Prospect Avenue."* If this is the case, then why is this development being considered?!
31. *Street systems gaps and deficiencies Exhibit 42. "Wilbur has a gap and deficiency causing issues for north south travel. Funneling traffic onto School Ave, Berney Elementary impacts."* As I live off of Kendall I am all too aware of the few arterials to the Eastgate part of town. How can this development even be considered until School is improved as well as Wilbur's gap? Berney Elementary will experience tremendous traffic increase up School avenue which will be an increased risk to school children at an already problematic intersection at Berney on School Ave. In addition the traffic in front of Prospect Point and WaHi will be greatly aggravated with the large number or additional vehicles. How has this been adequately planned for?
32. *Exhibit 43. "Lack of bicycle connectivity to the area already identified."* This area is particularly already dangerous for bicycles. How will this concern be fully addressed including all of Kendall avenue and Reeser?
33. *Exhibit 44. "Missing sidewalk arterial gaps already identified in the area along Cottonwood and Reser."* This issue will be greatly aggravated with a tremendous increase in traffic. This seems folly, especially when so many students walk up Kendall and Reser to school. How is this development

plan not a clear and present danger increasing the risk of vehicle impacts to our kids? Why aren't the roads fixed adequately first within city limits and nearby county roads PRIOR to further sprawl?

34. *"Valley Transit's 2016 Master Plan identifies that their six-year projected revenues through 2021 will allow for a continuation of current services; however, revenues are insufficient to expand connectivity or frequency." TP-15* If this is the case, then no additional expansion will be possible for some time. It seems prudent to expand housing within existing city boundaries prior to huge expansions away from Valley Transit! Why is this expansion happening given projected revenues to Valley Transit?
35. *"Comprehensive service coverage can be improved by locating transit stops throughout the City's developed areas so that schools, employment areas, businesses, and residences are within a quarter mile from the nearest transit stop. The Valley Transit Master Plan did not identify fixed-route service expansion but did mention the need for the construction of transit stop accommodations such as transit shelters. Transit service would also benefit from complete and safe bicycle and pedestrian networks, with emphasis on filling network gaps and improving connections to transit stops (including pedestrian crossings, direct connections to building entrances, and adequate lighting). Focus should be on completing the sidewalk and bicycle network and increasing service to schools, medical facilities, businesses and residences." TP-15* This implies existing developed areas need priority prior to expanding. Why would this development do anything other than aggravate the problem? Exhibit 45 shows lack of transit in UGA area in question.
36. *"Key gaps and deficiencies in the City's freight system include: 'A lack of connection from Cottonwood Road to a freight route. Consider Prospect Ave to Taumarson Rd to SR 125 via the future SE Myra Rd extension and improving Langdon Road to Plaza Way which would facilitate a freight connection on SR 125 via Old Milton Highway.'" TP-17* Explain how this freight route connection from Cottonwood Road to a freight route will be impacted by this development or fits into the plans for this much new traffic in the area?
37. *Exhibit 46 shows existing intersection gaps fail to meet standards.* Why would we add such a population of cars to intersections which are already below standard in the nearest traffic intersections?
38. *"The 2018–2023 Walla Walla Transportation Capital Facilities Plan (CFP) identifies several transportation projects that are likely to have funding by 2023. Those projects can be found in the Funding section later in this chapter "(see page TP-35). If projects in the new development area don't have funding identified, then why would we develop in this area?*

39. MM-30, proposed improvements to Cottonwood are part of the 20 year improvement plan. This does not cover Kendall Ave. Also, the project is one of the most expensive proposed at \$7M. With only \$17M likely available through 2023, this is unlikely to occur. (Exhibit 52) Also, is not listed as a priority project should funding become available (Exhibit 53) If road improvements required for the area are not likely to be funded, then why would this expansion be considered at all, or at a minimum at this time?
40. Three bridges on Kendall not mentioned in Exhibit 51 future bridge projects. How will expanding Kendall for increased traffic, bike path and pedestrian traffic be completed without new bridges? This seems a recipe for disaster given the estimated increased Kendall vehicle traffic. This development is premature considering the timeline for upgrading the bridges and surrounding infrastructure.
41. Exhibit 56 shows the 2nd to cottonwood connection as a freight route. With the increase in traffic this seems to contradict. How is this consistent with new development in the area?
42. *Intersection operational standards for long-range planning and development review should be consistent with those documented in the City's Transportation Impact Analysis (TIA) Guidelines. The City uses a Level of Service (LOS) standard for its TIA Guidelines, which is based on a Highway Capacity Manual calculation of delay that varies between signalized and unsignalized intersections. In addition to the LOS guidelines, the city also has a volume-to-capacity (v/c) standard to help in situations where one metric may not be enough, such as all-way stop where one approach is over capacity but overall intersection delay meets standards. The recommended standards, which apply to the daily peak hour, are shown in Exhibit 57. The City requires a higher level of service for streets where the capacity is of higher importance, such as major arterials and freight routes. TP-35" Given that 2<sup>nd</sup> to Cottonwood is called out as a freight route, and the City requires a higher level of service for streets of this nature, what is the plan to accomplish this given the development?*
43. *TP Policy 1.5 Require development to provide off-site safety improvements such as pedestrian crossings when there is a need for such improvements, as demonstrated through a Traffic Impact Analysis, and needed improvements are consistent with an adopted plan. How is this policy being completed sufficiently to be include all needed improvements? Is there a comprehensive list of all the surrounding needed improvements?*
44. *TP Policy 3.3 Require development to provide off-site multi-modal improvements when there is a need for such improvements, as demonstrated by a Traffic Impact Analysis, and needed improvements are consistent with an adopted plan." What off site multi modal improvements will be included?*

45. TP Policy 3.4 “Require multimodal connections to be provided within development sites, as well as to the adjacent transportation system and surrounding uses.” How is this policy being addressed in this new development?
46. TP Policy 4.4 Require a Traffic Impact Analysis where additional information is needed regarding the transportation impacts of a development proposal on the existing and planned transportation system. Require mitigation as needed to protect and improve transportation facilities in the city. How is the school traffic in the area being addressed by the TIA? Are the hours that school are in session being considered as this will be the heaviest time of day? How are the high risk intersections being addressed in the TIA, how are the lack of sidewalks and bike lanes being factored in? Is the School Avenue connection to Eastgate and the impacts to the Arterial being considered? Is the short stretch in front of the Fern Fire Station being evaluated for likely backup during busy commute times?
47. TP Policy 5.6 Require development to provide street frontage improvements consistent with plan and code requirements, either through construction of the project or through deferral or a fee-in-lieu payment, as permitted by adopted code. The amount of street frontage improvements do not seem to address all the areas impacted. The county or city will likely need to address the other sides of streets and impacted bridges and intersections nearby or impacted by traffic. These are significant costs which need to be considered.
48. TP Policy 5.7 “Promote and implement streetscapes that are aesthetically pleasing, safe, and comfortable to residents, visitors, businesses, and property owners.” How is this Policy taking into consideration the surrounding property owners, of which thousands in Walla Walla have signed a petition against this development? This plan violates this policy.
49. TP Policy 5.8 “Implement designated freight routes for oversize/overweight truck loads and hazardous materials. “ How is this being taken into consideration as Cottonwood is designated and shown as a future freight route.
50. TP Policy 5.9 “Where determined to be needed by the City Engineer, implement neighborhood traffic management using techniques such as curb extensions, median islands, diverters, speed humps, and traffic circles to reduce traffic speeds and enhance safety” Has the City Engineer determined techniques required for the area to reduce speeds and enhance safety? Will they all be implemented in the development plan? If not, who will foot the bill?



51. Are planned improvements coordinated with Annual updates to the 6 Year TIP, CFP and Development Regulation Updates? *Reference TP-41*
52. *“Population growth through annexation of the Urban Growth Area (UGA) south of the city may require new facilities to ensure response capabilities are maintained. The 2017-2022 Capital Facilities Plan identifies a new fire station in the south.” CFU-8* How is this being addressed prior to approval? If this fire station is not funded, why would the plan be allowed to move forward? Have the new facilities been identified and planned for prior to moving forward?
53. *CFU-15, “The City is projecting moderate population growth over the next twenty years, with 5,690 new people expected within the City by 2038.”* Why is this new development required if there are over 8,000 available expansion residential areas within city limits as per LU-2 from the 2040 plan? This growth does not seem to warrant urban sprawl with high density housing on the edges of town. Existing infill will more than fill the current requirements all the way out to 2038, what is the hurry when infrastructure is not in place to expand? This seems poor planning and folly!
54. *CFU Policy 1.7 “Reassess the Land Use element if the City cannot provide funding to maintain adopted levels of service for public facilities and utilities that it manages.”* It seems clear that the city should reassess the Land Use element of the property given that the policy requires a reassessment if the city cannot maintain the adopted levels of service for required public facilities and utilities. Will the land use element be reassessed? If not, why not as multiple comments above have determined funding is already a struggle for existing routes and services offered, much less new facilities and expansion. This policy should be implemented for this UGA based on the facts.
55. *CFU Policy 2.4 “When siting new housing, take into consideration accessibility to community facilities and services, including schools, recreational facilities and areas, and parks, particularly for lower- and moderate-income families and individuals.”* How is this accessibility to community facilities being particularly and carefully considered given that the intention for this urban sprawl is low income housing in an inaccessible part of town? It is the exact opposite of the policy to allow this high density to go forward on the outskirts of town without proper planning regarding all the elements that go into city planning.