



**CITY OF BOULDER
CITY COUNCIL AGENDA ITEM**

MEETING DATE: December 3, 2019

AGENDA TITLE: Staff briefing regarding the 2020 Mid-Term Update of the Boulder Valley Comprehensive Plan, including process, schedule, and scope.

PRESENTERS:

Jane S. Brautigam, City Manager
Chris Meschuk, Asst. City Manager and Interim Director of Planning
Jim Robertson, Comprehensive Planning Manager
Jean Gatzka, Senior Planner
Phil Kleisler, Senior Planner

EXECUTIVE SUMMARY

The purpose of this memorandum is to share information with and request feedback from the City Council about the proposed process, schedule, and scope of the 2020 Mid-Term Update of the Boulder Valley Comprehensive Plan (“BVCP” or “the Plan”). The Planning Board and the City Council will each play a significant role in shaping the scope and schedule for the Mid-Term Update, and both bodies must ultimately approve changes to the Boulder Valley Comprehensive Plan.

The key topics addressed in this memorandum include:

- What is a mid-term update?
- What types of changes can be included in a mid-term update?
- What is the proposed process and schedule for the mid-term update?
- What is the approval process for a mid-term update?
- What changes to the Plan do we anticipate may be included in the 2020 Mid-Term Update?

COMMUNITY SUSTAINABILITY ASSESSMENTS AND IMPACTS

- Economic – No changes to BVCP economic policies or other components of the Plan affecting Boulder’s economic vitality are anticipated as part of the 2020 Mid-Term Update.
- Environmental – New policy direction as a result of the currently underway Climate Mobilization Action Plan (CMAP) may result in amendments to the BVCP.
- Social – No changes to BVCP policies related to social sustainability, provision of services or community engagement are anticipated as part of the 2020 Mid-Term Update. The process will include appropriate opportunities for community engagement based on the city’s strategic engagement framework and decision-making process.

OTHER IMPACTS

- Fiscal – No fiscal impacts are anticipated to result from any processes or changes to the BVCP that may be considered as part of the Mid-Term Update.
- Staff time – Staffing for the BVCP Mid-Term Update is included in the Planning Department work plan for 2020.

STAFF RECOMMENDATION

Staff requests feedback on the 2020 Mid-Term BVCP Update including the process, schedule, and scope.

Questions for City Council

1. Does City Council agree with the proposed process and schedule for the BVCP Mid-Term Update, specifically keeping the update streamlined and limited in scope?
2. Does City Council have other feedback on the preliminary inventory of update topics or the Action Plan?

BOARD AND COMMISSION FEEDBACK

The Planning Board reviewed the proposed process, schedule and scope for the BVCP Mid-Term Update on Nov. 20, 2019. Board members agreed with the staff recommendation to keep the update limited in scope focusing primarily on providing an opportunity for the public to request changes to the plan that do not involve significant city and county resources to evaluate and make minor additions or clarifications to the policy section to reflect already adopted policy direction.

Initial comments from the board regarding the BVCP Action Plan included:

- Focus on continued implementation
- Support for bold and innovative engagement with youth on planning projects
- Potentially prioritize Diagonal Plaza in list of future projects for Area Planning

BACKGROUND

The BVCP states, “The Boulder Valley Comprehensive Plan is a joint policy document legislatively adopted by the City of Boulder and Boulder County. The plan is updated periodically to respond to changed circumstances or community needs.” The Plan describes four ways in which it can be modified (changes that can be considered at any time, map-only update, mid-term update, and major update) and specifies the types of changes that can be made via each of those processes. The city and county conducted a

major update during the period 2015 to 2017, with the update adopted by the approving bodies in 2017. The next major update will be initiated in 2025. The city will initiate a mid-term update (“the 2020 Mid-Term Update”) in early 2020.

As noted above, the Plan specifies the types of changes that can be made via each of the four processes. Regarding mid-term updates, the Plan says,

A mid-term update will be initiated at some point between major updates. The purposes of the mid-term update are to address objectives identified in the last major update and review progress made in meeting those objectives, provide an opportunity for the public to request changes to the plan that do not involve significant city and county resources to evaluate, and make minor additions or clarifications to the policy section. The mid-term update is not intended to be a time to consider major policy changes.

Changes that may be considered during a mid-term update include:

- Changes to the Land Use Map
- Changes to the Area I, II, III Map
- Planning Area boundary changes
- Minor edits to the policy section (Ch. III)
- Minor text edits
- Changes to the Subcommunity and Area Plan section (Ch. V)
- Changes to the Master Plan and Program summaries (Ch. VI)
- Changes to the Urban Service Criteria and Standards (Ch. VII)

The schedule and process for updates are specified in the BVCP; see **Attachment A**.

ANALYSIS

Process and Timeline:

Staff recommends keeping this mid-term update process as streamlined as possible. The primary purposes for this update include:

1. Provide an opportunity for the public to request changes to the BVCP;
2. Amend the BVCP to reflect map and text changes stemming from plans accepted by the council since the last update (e.g., Alpine-Balsam Area Plan, Open Space Master Plan, etc.);
3. Amend the BVCP maps reflecting changes resulting from open space property acquisitions and annexations; and
4. Other miscellaneous changes.

Proposed Schedule:

First Quarter, 2020

- The city and county will finalize the scope and schedule of the Mid-term Update;
- Open the public request process for proposed map and policy amendments; and
- Begin other tasks as directed by the decision-making bodies.

Second Quarter

- The city and county screening process to direct staff on which public requests to consider further; and
- Work on other tasks as directed by the decision-making bodies.

Third Quarter

- Community engagement window; and
- Analysis on proposed changes.

Fourth Quarter

- Public hearings to adopt the 2020 BVCP.

Preliminary Inventory of Update Topics:

The following is a preliminary inventory of changes that could be considered for the 2020 BVCP Update:

- Chapter 5, Subcommunity and Area Planning, to reflect revisions approved in early 2019 and add information about the adopted Alpine-Balsam Area Plan.
- Changes to the BVCP maps and policies per the public request process.
- BVCP Map Updates (i.e. reflect recent annexations or Open Space Acquisitions).
- Changes that may result from the Climate Mobilization Action Plan. On June 23, 2019, the City Council declared a “Climate Emergency” and initiated an enhanced climate effort called the Climate Mobilization Action Plan (CMAP). CMAP has five focus areas (Energy Systems Transformation, Circular Materials Economy, Regenerative Ecosystems, Land Use, and Finance) and two over-arching guiding principles (Equity and Resilience). The CMAP effort, which will be further defined in the coming months, may develop in new policy direction that would result in amendments to the BVCP.
- Additional changes initiated by decision-making bodies, members of the public, and staff to reflect recent processes and adopted policy direction.

Action Plan Update:

The Boulder Valley Comprehensive Plan Action Plan serves as an implementation tool of the BVCP and outlined the actions needed to implement policies that are currently not addressed through other plans and programs. The action plan establishes the timing and priorities for new program initiatives, planning projects and regulatory changes to implement the policy direction established at the major update. It is intended to be flexible and responsive to city goals and resources.

Programs or projects that implement a master plan are not typically included in the BVCP Action Plan. Ongoing programs or projects are not included.

The action plan is revisited periodically. The plan is adopted by the Planning Board and City Council, but not actually adopted into the text of the Boulder Valley Comprehensive Plan. Included in **Attachment B** is a status report on the action plan adopted in 2017. Adoption of the 2020 update of the Action Plan will be included as part of the mid-term update adoption in 2020.

Expansion into the Area III-Planning Reserve:

The Area III-Planning Reserve is a portion of Area III for which the city and county have agreed to maintain the option of future Service Area expansion - *see BVCP Section 1.12 (pg. 26)*. The BVCP further states (*Section 2.07.b, pg. 38-39*) that “[t]he location and characteristics of this land make it potentially suitable for new urban development based on the apparent lack of sensitive environmental areas, hazard areas, significant agricultural lands, the feasibility of efficient urban service extension and contiguity to the existing Service Area which maintains a compact community.”

The process to consider service area expansions in the Area III-Planning Reserve is described in Exhibit B to the Boulder Valley Comprehensive Development Plan Intergovernmental Agreement, between the city and Boulder County, (pg. 158) stating that the “City of Boulder will complete a baseline urban services study of the Area III - Planning Reserve prior to considering a service area expansion.” (Emphasis added.) The city may consider a service area expansion only after acceptance of the baseline urban services study by City Council. If the City Council wanted to consider a service area expansion into the Planning Reserve in the context of the 2025 BVCP Major Update, then council would need to complete a baseline urban services study prior to 2025. Attachment C diagrams the process for considering and taking action regarding a service area expansion into the Area III-Planning Reserve.

Public Engagement and Process:

In addition to the general notice requirements of the BVCP, staff will develop an engagement plan modeled on the city’s decision-making process.

ATTACHMENTS:

Attachment A: Schedule and Process for BVCP Updates

Attachment B: Status report on the 2017 BVCP Action Plan

Attachment C: Diagram regarding Service Area Expansion into the Planning Reserve

Attachment A: Schedule and Process for BVCP updates

(from Exhibit B to the BVCP Intergovernmental Agreement: “Amendment Procedures”)

Schedule: Prior to the beginning of each update, the city Planning Department and the county Land Use Department will establish a process and schedule for the update. The schedule and process will be revised as needed during the review process. The process will include an opportunity for landowners and the general public to submit requests for changes to the plan. During major updates, policy changes should precede map changes.

Screening: Proposed changes from the public, staff and approval bodies will be reviewed by the city Planning Department, which will prepare a recommendation in consultation with the county Land Use Department on which proposals should go forward and which proposals should receive no further consideration. The bodies will consider all requests for changes together with the staff recommendations at initial public hearings and will compile a list of proposed changes to be considered during the update based upon:

- consistency with the purposes of the update as described above,
- available resources to evaluate the proposed change (city and county staffing and budget priorities),
- consistency with current BVCP policies, and
- compatibility with adjacent land uses and neighborhood context.

Further study & initiation of hearings: After a list of proposed changes to be considered during the update has been determined, the city Planning Department and county Land Use Department will study, seek appropriate public input, and make recommendations concerning proposed changes. Requests for changes to the comprehensive plan that affect an area designated Open Space will be reviewed by the city Open Space Board of Trustees and the county Parks and Open Space Advisory Committee. The board of trustees will make a recommendation prior to any action on that change. The bodies will then initiate the hearings on whether to approve, modify or deny any of the proposed changes.

Boulder Valley Comprehensive Plan (BVCP) Action Plan

2015 Major Update to the BVCP

September 5, 2017

As Updated: November 5, 2019 (changes shown in red)

The **Action Plan** serves as an implementation tool of the BVCP and outlines the actions needed to implement policies that are currently not addressed through other plans and programs. It establishes the timing and priorities for new program initiatives, planning projects and regulatory changes to implement this major update – before the next major update. It is intended to be flexible and responsive to city goals and resources. Each action item has varying levels of timing, complexity, and resource needs, but almost all projects will entail community engagement and public participation.

The BVCP Action Plan is adopted by City Council after each Major Update and revisited alongside the council work plan and budget process – in this case in early 2018. It creates a framework to help council set priorities for new initiatives or programs, planning projects and regulatory changes to implement the major update to the BVCP. The county is sent a referral and invited to identify those actions, projects or other implementation activities in which they wish to participate. The county may also propose new or additional collaborative actions for city consideration during the major update.

The Action Plan does not include reference to work being led by other departments that may implement the plan or that will be part of other efforts (e.g., the Transportation Master Plan, Open Space Master Plan, Economic Sustainability Strategy, other items on the Housing Boulder work plan, or ongoing core services in Planning, Housing & Sustainability department).

The Action Plan table includes:

- **Action Item:** The type of work to be done.
- **BVCP Topic & Chapter:** The focus area addressed and the BVCP chapter (and policy).
- **Lead Department:** The department that will oversee the initiative, recognizing most work is collaborative

with other departments, organizations, businesses, and community members.

- **Timing:** The year to initiate the project based on priorities within the work plan:
 - **Near-term:** 2017-2018
 - **Mid-term:** 2019-2020
 - **Long-term:** 2021+
- **Level of Effort:** An estimate of staff time and resources and council and community effort needed to complete the work.
- **Status:** A note about whether project has been started.

BVCP Action Plan

ACTION ITEMS	BVCP TOPIC & CHAPTER	LEAD DEPT.	TIMING	LEVEL OF EFFORT	STATUS
SUBCOMMUNITY & AREA PLANNING					
<p>Develop an area plan for Alpine-Balsam, possibly with county-owned site at Iris and Broadway.</p> <p>The city will use the foundation of the guiding principles, strategies, and performance criteria in the Alpine-Balsam Vision Plan, outline the desired character of redevelopment, including its character and scale, land uses, streets and parking, and other aspects of the public realm. Additionally, staff will coordinate with Civic Area / Central Area planning efforts and the City Facilities Assessment and the county. Use innovative and creative community engagement processes, as recommended through the Public Participation Working Group's process and Alpine-Balsam Vision Plan.</p>	Subcommu nity and Area Planning, Ch. V	Planning	Near-term	High	<p>The Alpine-Balsam Area Plan was adopted by City Council 10/1/2019. Discussions are currently underway between city and county regarding the county's potential participation in redevelopment at Alpine-Balsam and potential redevelopment at Broadway and Iris.</p>
<p>Reestablish Subcommunity Planning Program</p>	Subcommu nity and Area Planning, Ch. V	Planning	Near-term	Medium	<p>Completed. In late 2018 and January 2019, the city council approved six Foundational Elements for subcommunity planning: definitions, boundaries, prioritization criteria, scope, schedule, and community engagement.</p>
<p>East Boulder Subcommunity Plan</p>	Subcommu nity and Area Planning, Ch. V	Planning	Near-term	High	<p>Ongoing. The project has completed Phases One (Kickoff) and Two (Inventory and Analysis) and has initiated Phase Three (Concept Development). The Plan will be presented for adoption in late 2020 or early 2021.</p>

ACTION ITEMS	BVCP TOPIC & CHAPTER	LEAD DEPT.	TIMING	LEVEL OF EFFORT	STATUS
<p>Coordinate on CU South next steps.</p> <p>The city will define an ongoing public engagement process for future coordination and planning for the site with CU and the county using the BVCP land use designation and guiding principles to guide that process and to work toward an annexation agreement (intergovernmental agreement) with CU.</p>	<p>Ch. III, Sec. 1 (Policy 1.05) CU South Guiding Principles</p>	<p>Planning, coordinating with Public Works utilities</p>	<p>Near-term <i>(ongoing)</i></p>	<p>Medium</p>	<p>Ongoing. CU submitted an annexation application in early 2019. Discussions regarding the application are proceeding concurrent with preliminary engineering for South Boulder Creek flood mitigation.</p>
<p>Determine a neighborhood planning/infill pilot project.</p> <p>The plan notes that a self-selected neighborhood may move forward according to the criteria in the plan and interests in certain outcomes, including addressing housing types that may be appropriate as infill in residential areas of Boulder. Outcomes of the neighborhood infill or planning project may include but are not limited to area plans, regulations, new residential building types or others. While the survey supported all infill types (e.g., Accessory Dwelling Units (ADUs), detached homes on existing lot, duplex conversion, or cottage court style units), responses varied by neighborhood.</p>	<p>Subcommunity and Area Plans, Ch. V</p>	<p>Planning</p>	<p>Near-term</p>	<p>High</p>	<p>Not Started</p>
<p>Begin phase 2 of the 2007 Transit Village Area Plan.</p> <p>The city will determine when to begin Phase 2 of Transit Village Area Plan (TVAP) – for the area east of the tracks and west of 30th Street. The Implementation Plan for TVAP notes that Phase 2 will occur after Phase 1, 10 to 15 years after plan adoption. The plan calls for: reassessing TVAP Phase 2 plan land uses, determining if any adjustments are necessary for the Boulder Junction area, developing a plan for providing public improvements in Phase 2 and a market study for land uses, and beginning Phase 2 land use and zoning changes. Property owners would be part of the effort.</p>	<p>Subcommunity and Area Planning</p>	<p>Planning</p>	<p>Mid to Long-term</p>	<p>Medium to High</p>	<p>Not Started</p>

ACTION ITEMS	BVCP TOPIC & CHAPTER	LEAD DEPT.	TIMING	LEVEL OF EFFORT	STATUS
<p>Develop an area plan for 55th Street and Arapahoe Avenue.</p> <p>Use the policies identified in the BVCP for neighborhood activity centers to develop an area plan for the area near 55th and Arapahoe focusing on the future mix of uses that may be appropriate. Develop a public engagement process that includes businesses, residents and neighbors and property owners. Coordinate with East Arapahoe Transportation Plan project to ensure compatibility between mobility options and land use.</p>	Subcommunity and Area Planning, Ch. V	Planning	Mid-term	High	Ongoing, within the context of East Boulder Subcommunity Plan and in coordination with multi-agency 55 th and Arapahoe Station Area Planning.
<p>Prioritize other future area plans.</p> <p>Based on the policies of the plan for mixed use centers, the city will identify other neighborhood centers or mixed-use commercial areas where area planning should be done accomplish BVCP policies. The city will prepare community engagement plans that include affected and interested parties and neighbors. Areas that may be planned for over a slightly longer time horizon include: (1) East Walnut area, east of 33rd Street / South of Pearl Street, (2) Basemar Center, (3) Meadows Center, (4) Table Mesa Center, and (5) Diagonal Plaza.</p>	Subcommunity and Area Planning, Ch. V	Planning	Long-term	Medium	Not started
<p>Update and expand the subcommunity fact sheets and maps.</p> <p>Using input from surveys and community meetings, staff is compiling a summary planning sheet for each subcommunity that identifies issues, needs and desires. Staff is cataloging the information and adding it to the existing subcommunity fact sheets and online storymaps.</p>	Subcommunity and Area Planning, Ch. V	Planning	Long-term	Low	Ongoing
LAND USE CODE UPDATES TO SUPPORT BVCP GOALS INCLUDING HOUSING					
<p>Update Inclusionary Housing Ordinance.</p> <p>The city will amend the ordinance to include a middle-income housing requirement in addition to the 20 percent requirement for low- and moderate- income households, add incentives for on-site units, increase the ceiling on the annual adjustment and introduce a staff-level design review.</p>	Housing Affordability and Diversity Ch. III, Sec. 7	Housing	Near-term	Medium	Completed, November 2017.

ACTION ITEMS	BVCP TOPIC & CHAPTER	LEAD DEPT.	TIMING	LEVEL OF EFFORT	STATUS
<p>Amend the Land Use Code for building height (up to City Charter 55-ft.) including affordable housing community benefit.</p> <p>The city will review and update site review criteria to provide clear guidance on height and intensity (floor area ratio) of land uses and to address relationship of building height (up to the City Charter 55-foot height limit) as an incentive in exchange for community benefits that further community objectives such as affordable housing beyond that otherwise required by the underlying zoning. The process will include technical and economic analysis and community outreach. It will be completed by July 2018 (the expiration of the building height ordinance).</p>	<p>Design Quality and Place-making (Height), Ch. III, Sec. 1 (Policy 1.11), Sec. 2 (Policy 2.35, Building Height)</p>	<p>Planning</p>	<p>Near-term (finish July 2018)</p>	<p>Medium to High</p>	<p>Phase One completed October 2019, when City Council passed Ordinance 8359 establishing a new community benefits program within which additional building height (up to 55') could be permitted in exchange for affordable housing benefits.</p>
<p>Amend the Land Use Code for accessory dwelling units (ADU).</p> <p>The city will identify incremental changes to encourage accessory dwelling units with the goal of promoting a diversity of housing opportunities in the city. The five areas include:</p> <ul style="list-style-type: none"> • Simplifying current regulations; • Modifying the saturation requirement to increase it; • Providing flexibility in limits to unit size; • Removing or modifying the parking requirement; • Exploring location-specific implementation. <p>Staff will engage the community prior to preparing a proposal for public hearings.</p>	<p>Housing Affordability and Diversity Ch. III, Secs. 2 (Policy 2.11) and 7 (Policy 7.06)</p>	<p>Housing with Planning</p>	<p>Near-term</p>	<p>Medium</p>	<p>Phase One completed December 2018, when City Council passed Ordinance 8256 making incremental changes to the code applicable to accessory dwelling units.</p>

ACTION ITEMS	BVCP TOPIC & CHAPTER	LEAD DEPT.	TIMING	LEVEL OF EFFORT	STATUS
<p>Amend the Land Use Code, Site Review Criteria for enhanced community benefit and to achieve more affordable housing.</p> <p>For land use or zoning district changes that result in increases in density or intensity of development beyond what is permitted by underlying zoning, the city will develop regulations and incentives so that new development provides benefits to the community beyond those otherwise required by the underlying zoning. Develop a scope of work that includes reference to Policy 1.11 and the benefits identified therein, addresses technical and economic analysis, and includes a process for community outreach and collaboration. Develop regulations to ensure that when additional intensity is provided through changes to zoning or variances to zoning requirements, a larger proportion of the additional development potential for the residential use will be permanently affordable housing.</p>	<p>Design Quality and Place-making (Community Benefit), Ch. III, Sec. 1 (Policy 1.11)</p> <p>Housing Affordability and Diversity Ch. III, Sec. 7</p>	<p>Planning</p>	<p>Near-Term <i>(may start with building height item but take longer to finish)</i></p>	<p>Medium to High</p>	<p>Partially completed; see above.</p>
<p>Prioritize and ongoing list of potential Land Use Code amendments.</p> <p>The city has compiled a list of potential Land Use Code amendments based on input from staff, Planning Board, the community, and council. Many of those changes relate to aspects of the Code and regulations that are not yielding desired development outcomes, either procedures or technical provisions (e.g., parking, use tables, site review criteria beyond community benefits). In fall 2017, staff, Planning Board and Council will again evaluate proposed amendments on the list and prioritize work to be done to accomplish community goals identified through the BVCP and as part of separate efforts. The list of Proposed Changes to the Land Use Code will go to Planning Board and then council as an information packet to invite prioritization.</p>	<p>Housing Affordability and Diversity, Design Quality and Place-making</p>	<p>Planning</p>	<p>Some code changes Near-term, others Mid-term</p>	<p>High</p>	<p>Ongoing</p>

ACTION ITEMS	BVCP TOPIC & CHAPTER	LEAD DEPT.	TIMING	LEVEL OF EFFORT	STATUS
<p>Amend the Land Use Code BR-1 & BC-2 to encourage future housing opportunities in the Boulder Valley Regional Center.</p> <p>The city will explore how to allow and incentivize additional diverse housing types in the Boulder Valley Regional Center while addressing other community priorities such as high quality urban design and walkable places. This work will entail additional community, business, and property owner engagement. Code amendments may address standards in these districts such as parking, open space, connections, mixed-use, mobility, community benefits and building scale for each zoning district. Amendments may include revisions to the BVRC design guidelines or potential for form-based plans and codes.</p>	<p>Housing Affordability and Diversity, Jobs/ Housing Balance, Ch. III, Sec. 2 (Policy 2.18)</p>	<p>Planning with Housing</p>	<p>Mid-term</p>	<p>High</p>	<p>Not Started</p>
<p>Amend the Land Use Code for Light Industrial Areas and General Industrial (IG) zoning district.</p> <p>The city will include the public and stakeholders in a process to analyze and modify criteria to encourage residential and retail infill in IG zoning districts. Reevaluate contiguity requirements and encourage residential development in locations near services, retail and transit. Maintain existing allowed industrial uses. Allow additional limited retail and foster redevelopment into walkable mixed-use “industrial districts”. Address other standards for the IG district such as shared parking and open space. Consider modifying review procedures for any residential project in an IG zone (e.g., Site Review).</p>	<p>Housing Affordability and Diversity, Jobs/ Housing Balance, Ch. III, Sec. 2 (Policy 2.21)</p>	<p>Planning</p>	<p>Mid-term</p>	<p>High</p>	<p>Not Started. This work will be conducted as part of the implementation of the East Boulder Subcommunity Plan, likely beginning in 2021.</p>
METRICS & OTHER ITEMS					
<p>Update the BVCP Natural Ecosystems Map.</p> <p>The city will assess the current data and criteria used in the Ecosystems map to determine relationship with the city’s current Ecosystem Services. Provide this information in conjunction with the Open Space Mountain Parks (OSMP) master planning process.</p>	<p>Resilience Natural Environment, & Master Planning</p>	<p>Planning with OSMP and others</p>	<p>Mid to Long-term</p>	<p>Low to Medium</p>	<p>Started, but not yet completed.</p>
<p>Refine BVCP indicators.</p> <p>In coordination with the city’s new online dashboard, establish a process for narrowing, measuring, and using indicators to track progress and understand when major changes to the BVCP may be needed.</p>	<p>Metrics for Plan Ch. I, BVCP Indicators</p>	<p>Planning with City Manager’s Office</p>	<p>Long-term ongoing</p>	<p>Low to Medium</p>	<p>Started, but not yet completed.</p>

Attachment C: Process for Service Area Expansion into the Planning Reserve

