



CITY OF DUPONT

DEPARTMENT of Community Development
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COMPREHENSIVE PLAN UPDATE

STAFF REPORT & RECOMMENDATION TO THE PLANNING COMMISSION

Project: Comprehensive Plan Update

Date of Report: November 10, 2025

From: Patrick Kelly, AICP
AHBL, Inc., Planning Consultant to the City

Via: Barb Kincaid
City of DuPont, Public Services Director

Public Hearing: November 10, 2025, at 6:00 pm
DuPont City Hall / Council Chambers
1700 Civic Drive
Dupont, WA 98327

PROJECT DESCRIPTION: The proposal is to amend the DuPont Comprehensive Plan consistent with the amendment process as defined in DuPont Municipal Code (DMC) Chapter 25.170 DMC and as required by the Growth Management Act (GMA) and RCW 36.70A.130(4) and (5). The Comprehensive Plan was last amended December 7, 2021.

The Comprehensive Plan update includes the following elements: Introduction; Background and Context; Land Use; Economic Development; Natural Environment; Historic and Cultural Resources; Parks and Recreation; Housing; Transportation; and Capital Facilities and Utilities. Each element contains goals and policies, and typically provides a discussion of the background information, purpose, and intent of the policies.

LOCATION: The Comprehensive Plan address all land within the City boundaries.

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A. FINDINGS OF FACT:

1. History/Background

The Growth Management Act (GMA) sets requirements for fast-growing cities and counties to develop Comprehensive Plans, primarily codified under Chapter RCW 36.70A RCW. Pierce County is one of 18 counties required to "fully plan" under the GMA, and the requirements also includes all of the cities and towns within the County. All localities which "fully plan" must make periodic updates which are now on a 10-year cycle, meaning the next periodic update will be due in 2034.

The legislature made significant changes to the GMA since the last time DuPont conducted a Comprehensive Plan periodic update. Many of the changes then trickled down and modified requirements set forth by the Puget Sound Regional Council (PSRC, which encompasses King, Snohomish, Pierce, and Kitsap counties). The Housing and Land use Elements are the subject of the most significant changes. *DuPont is not yet required to adopt a Climate Element, and this is not included in the scope of this update.*

Some of the major legislative changes which impact the Comprehensive Plan and/or the City's development regulations include:

- HB 1220 (2021) requires jurisdictions to update their development regulations to support STEP housing (emergency shelters, transitional housing, emergency housing, and permanent supportive housing).
- HB 1110 (2023) requires that middle housing types be allowed in certain cities and limits design review processes that only target multifamily housing; HB 2321 (2024) was a "fix-it" for the original middle housing bill, giving more flexibility to smaller cities like DuPont.
- HB 1293 (2023) requires cities to have clear, objective, and understandable design review procedures and standards governing the exterior design of all new developments.
- SB 5290 (2023) relates to new permitting timeline requirements.

While these bills were taken into consideration during the Comprehensive Plan Update, in order to be properly implemented, many will require amendments to the City's development regulations. Draft development regulations are forthcoming and will require a Planning Commission public hearing, undergo separate environmental review, and be sent to the Department of Commerce for a 60-day review and comment period.

Gap Analysis:

The gap analysis identified changes required to the Comprehensive Plan since the last update. Comprehensive Plan policies required modification, removal, or inclusion. Updates to population and housing data and projections were required. Adequate lands to accommodate housing growth targets per income level by Pierce County required identification and verification. Potential racially disparate impacts required analysis. Updates to the capital facilities plan were required. The overall clarity and usability of the document required improvement, through incorporation of additional tables, charts, and graphs. The Department of Commerce and Puget Sound Regional Council (PSRC) checklists were completed to ensure consistency with updates to the GMA.

2. Procedural Requirements

The process to date has included the following events and meetings. City initiated its kickoff in January 2025. The elements of the kickoff included a briefing to the City Council and discussion and development of a public participation plan. Boards were placed in the public library to solicit input from residents. An open house was held on November 4, 2025, to brief the community on the upcoming scheduled public hearing with the Planning Commission. Regular public meetings have been held with the Planning Commission as follows, including the items discussed:

- March 11, 2024 – Introduction to the Periodic Update
- April 8, 2024 – Public Participation Plan, focus of chapter updates, work plan
- May 13, 2024 – Existing plan overview, future land use map, Gap Analysis, Guiding Concepts
- June 10, 2024 – Guiding Concepts
- July 8, 2024 – Guiding Concepts
- August 12, 2024 – Guiding Concepts, Introduction Chapter, Demographics, Land Capacity, Background and Context Chapter
- February 10, 2025 – Public Participation Plan, Gap Analysis, Review Introduction and Background and Context Chapters, discuss schedule
- March 10, 2025 – Finalize Public Participation Plan, receive input on Introduction and Background and Context Chapters, and Natural Environment Chapters
- April 14, 2025 – Review Historic and Cultural Resources Chapter, preliminary discussion on Economic Development Chapter and Capital Facilities Chapter
- April 28, 2025 – Additional discussion on Economic Development Chapter and Capital Facilities Chapter
- May 12, 2025 – Discussion of Transportation Chapter
- June 2, 2025 – Discuss Historic and Cultural Resources Chapter, and Transportation Chapter
- June 9, 2025 – Recap Historic and Cultural Resources, and Economic Development Chapters
- June 30, 2025 – Wrap up for Transportation and Economic Development Chapters
- July 14, 2025 – Review Economic Development, Historic and Cultural Resources, and Parks and Recreation Chapters
- August 11, 2025 – Review Parks and Recreation and Historic and Cultural Resources Chapters
- August 25, 2025 – Review Housing Chapter
- September 8, 2025 – Review Housing Chapter revisions, discuss Land Use Chapter
- September 22, 2025 – Discuss Land Use goals and policies, future land use map and zoning map
- October 13, 2025 – Discuss Land Use, Parks and Recreation Chapters
- October 27, 2025 – Discuss Capital Facilities Chapter

- (a) SEPA
 - i. A SEPA checklist was prepared on August 25, 2025
 - ii. A Determination of Nonsignificance was issued on October 31, 2025
- (b) In order to adopt the Comprehensive Plan, the following next steps are required:
 - i. Planning Commission holds public hearing to take testimony on the Comprehensive Plan Amendments. Public hearing duly noticed for November 10, 2025.
 - ii. Washington State Department of Commerce completes their required 60-day review
 - iii. Planning Commission issues a Recommendation to City Council. Tentatively scheduled for November 17, 2025
 - iv. City Council reviews Planning Commission recommendation and conducts first reading of the amendment ordinance on December 9, 2025
 - v. City Council conducts second reading of ordinance on December 16, 2025, and adoption of the Comprehensive Plan amendments
 - vi. Puget Sound Regional Council (PSRC) certifies Comprehensive Plan

B. DRAFT COMPREHENSIVE PLAN UPDATE

The proposed Comprehensive Plan Update is summarized as follows:

The **Introduction** provides a brief history of DuPont, identifies the plan's primary areas of focus, and outlines the Comprehensive Plan's vision statement. The Introduction also provides an explanation of the process and purpose of the Comprehensive Plan as well as its relation to other state and local processes. It also summarizes the other Plan Elements.

The **Background and Context Element** provides a comprehensive historical background and explains how the area's land use has been influenced by the area's geography and economic development. This element provides a community profile including demographic information, outlines the City's existing land use designations, provides historical context for housing and employment in DuPont, and introduces the City's housing and employment growth targets from the PSRC.

The **Land Use Element** provides an overview of the City's employment and housing projections based on Census data and growth targets assigned to the City by Pierce County. It also identifies the City's future land use designations as shown on the Future Land Use Map (FLUM) and provides an overview of each Village within DuPont and types of land uses within these areas. It includes a discussion about capacity of different permanent and emergency housing and provides various land use goals. The goals and policies focus on the general patterns of land use in the City.

Cities subject to the Growth Management Act, including DuPont, are required to identify capacity of land suitable for development that will accommodate housing and employment growth allocated to them. For DuPont, these allocations are adopted by Pierce County through their countywide planning policies (County Ordinance 2022-46s and 2023-22s). The growth allocated to DuPont through 2044 is shown in Table 1, below:

Table 1: Housing and Employment Growth

	2020	2020-2044 Growth Targets	2044 Total
Population	10,151	5,184	15,335
Employment	5,309	1,177	6,486
Housing Units	3,791	2,096	5,887

The Growth Management Act was amended by HB 1220 in 2023 to require not only that cities provide adequate land for assigned growth targets, but that land area specifically be identified for moderate, low, very low, and extremely-low income households. Housing units for these income levels were allocated to DuPont, as shown in Table 2, below.

A Land Use Capacity Analysis (LCA) was prepared as an appendix to the Land Use Element. As shown in the table, The LCA identified adequate capacity for all income levels, to be accommodated within the recently adopted Old Fort Lake Subarea Plan, the city's mixed-use and multifamily-zoned areas, Patriot's Landing, and the Former State Farm Campus.

Table 2: Housing Capacity

	PSH*	Non PSH	Extremely Low	Very Low	Low	Moderate	
	0-30%**	0-30%	>30-50%	>50-80%	>80-100%	>100%-120%	>120%
Allocation	271	366	389	307	132	120	511
Capacity			1,333			1,975	870
Surplus			+1,757			+1,723	+359

*Percent Area Median Income (AMI)

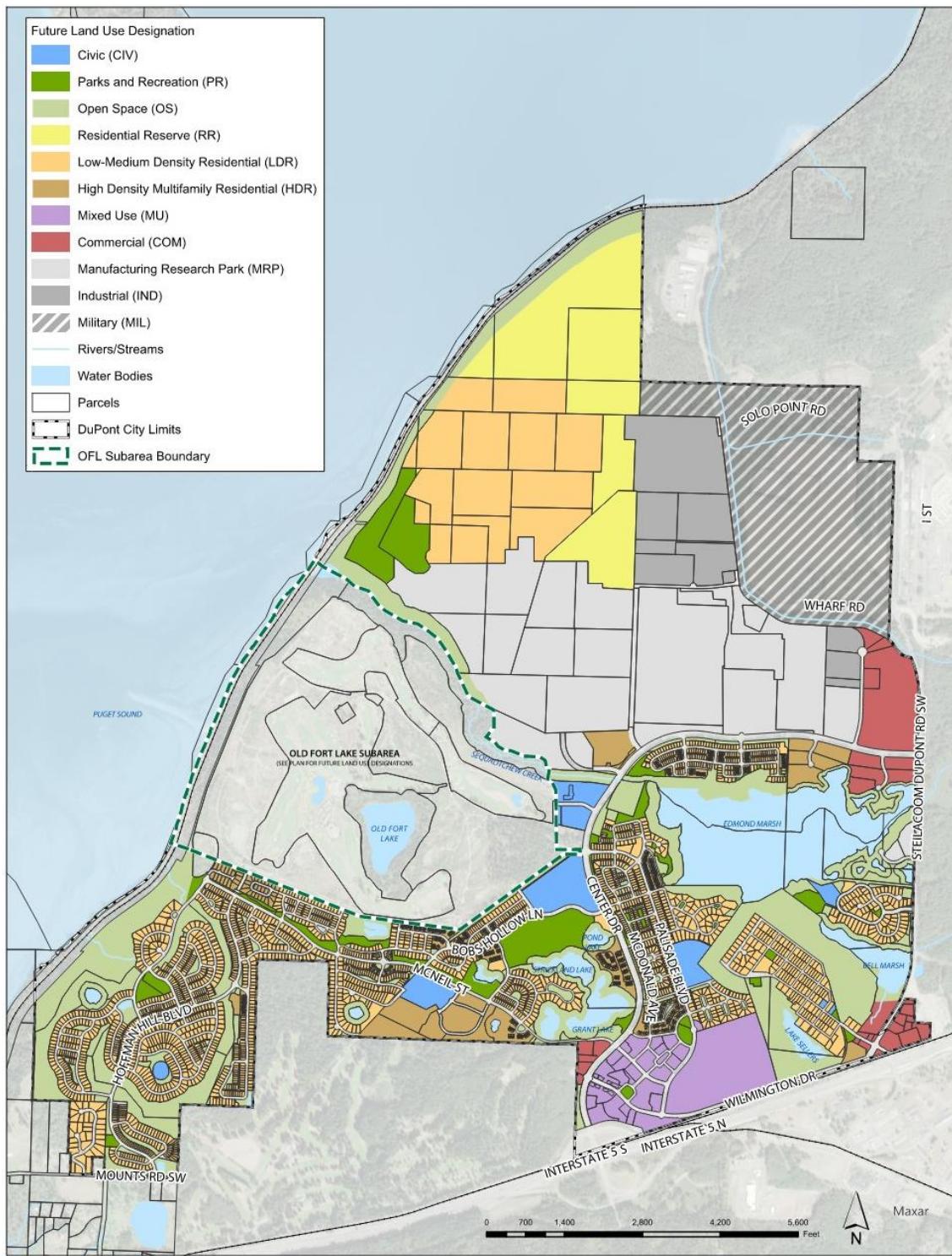
** Permanent Supportive Housing

The LCA also identified adequate lands for projected employment, within the existing commercial and industrial-designated lands. With a job growth target of 1,177 through 2044, a surplus of jobs capacity of 771 was identified in the LCA.

Updates to goals and policies were required to comply with new standards from the Department of Commerce and the PSRC. These policies address several topics, such as providing for equity in the planning process, climate change adaptation and resiliency, and public health.

The future land use designations are depicted in Figure 1, below and include Civic (CIV), Parks and Recreation (PR), Open Space (OS), Residential Reserve (RR), Low-Medium Density Residential (LDR), High Density Residential (HDR), Mixed Use (MU), Commercial (COM), Manufacturing Research Park (MRP), Industrial (IND) and Military (MIL). Access and circulation is depicted. The zoning map is also being updated to be consistent with the FLUM.

Figure 1



Summary of Amendments to the FLUM

Three residential designations (Residential 3, 4 and 5) were consolidated into a single Low-Medium Density Residential designation. The Mixed Use 1 and 2 designations were consolidated into a single

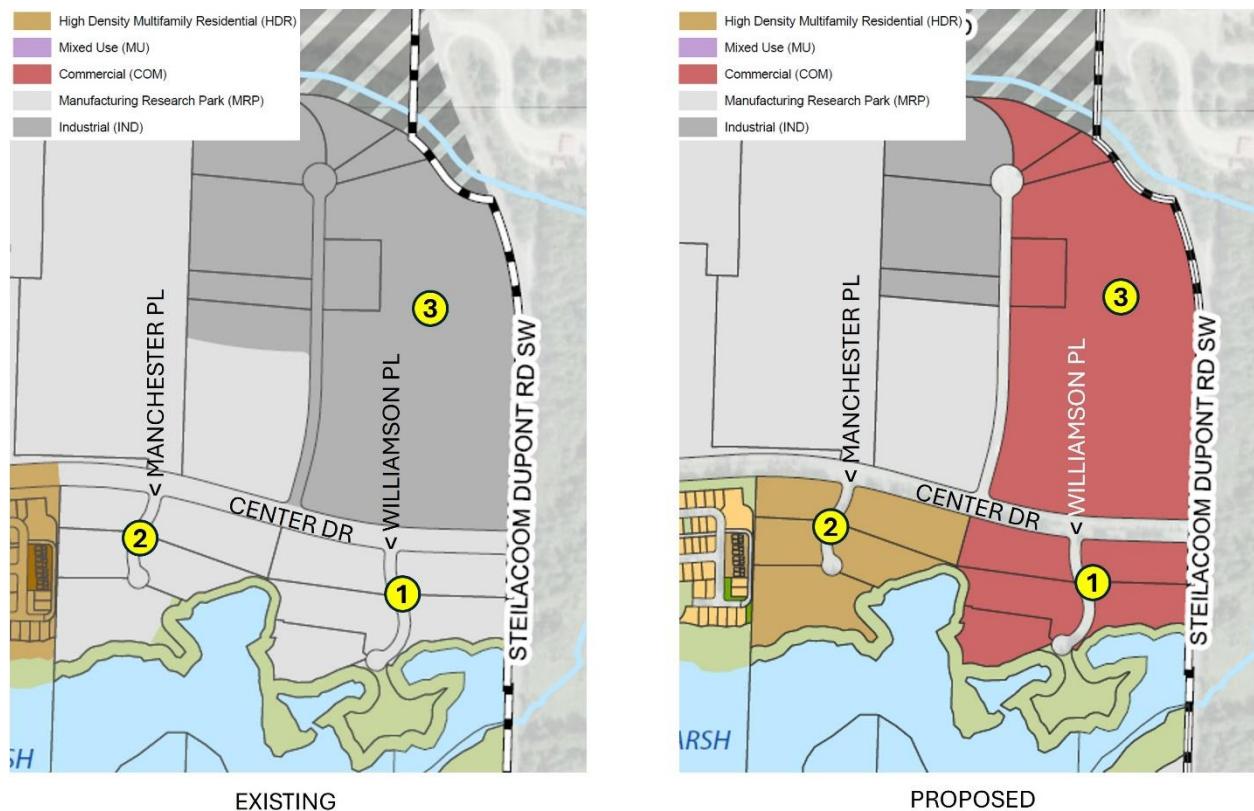
Mixed-Use designation. A Civic designation was created for community facilities and infrastructure, and all designations were removed from public roads.

The sets of figures below highlight specific areas of the plan that include changes to land use designation. Figure 2 focus in on parcels adjacent to Center Drive and DuPont Steilacoom Road. The areas of change on the “Existing” and “Proposed” maps are indicated by yellow dots.

The parcels accessed by Williamson Road and bounded to the north by Center Drive (1) would be redesignated from Manufacturing Research Park (MRP) to Commercial (COM). Additionally, the parcels bounded by Center Drive to the south and DuPont Steilacoom Road to the east (3) would be redesignated from Industrial to Commercial. These changes are made to be consistent with the current Commercial zoning designation, as the FLUM was not updated to correspond with this zoning.

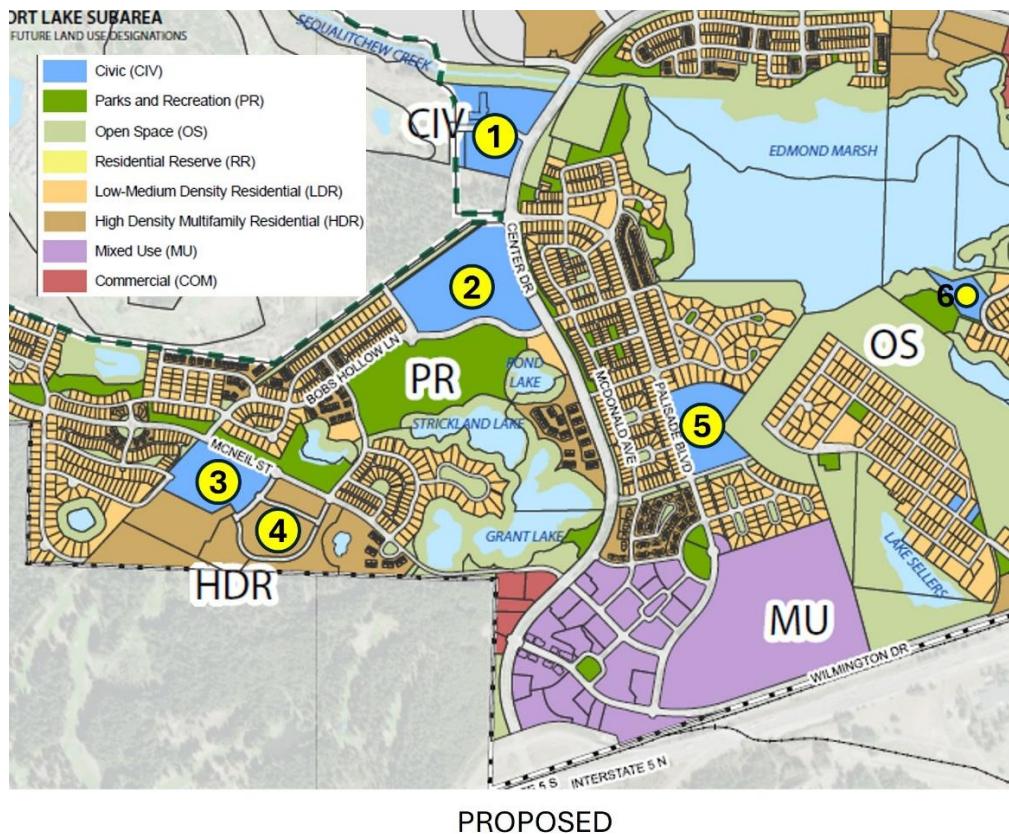
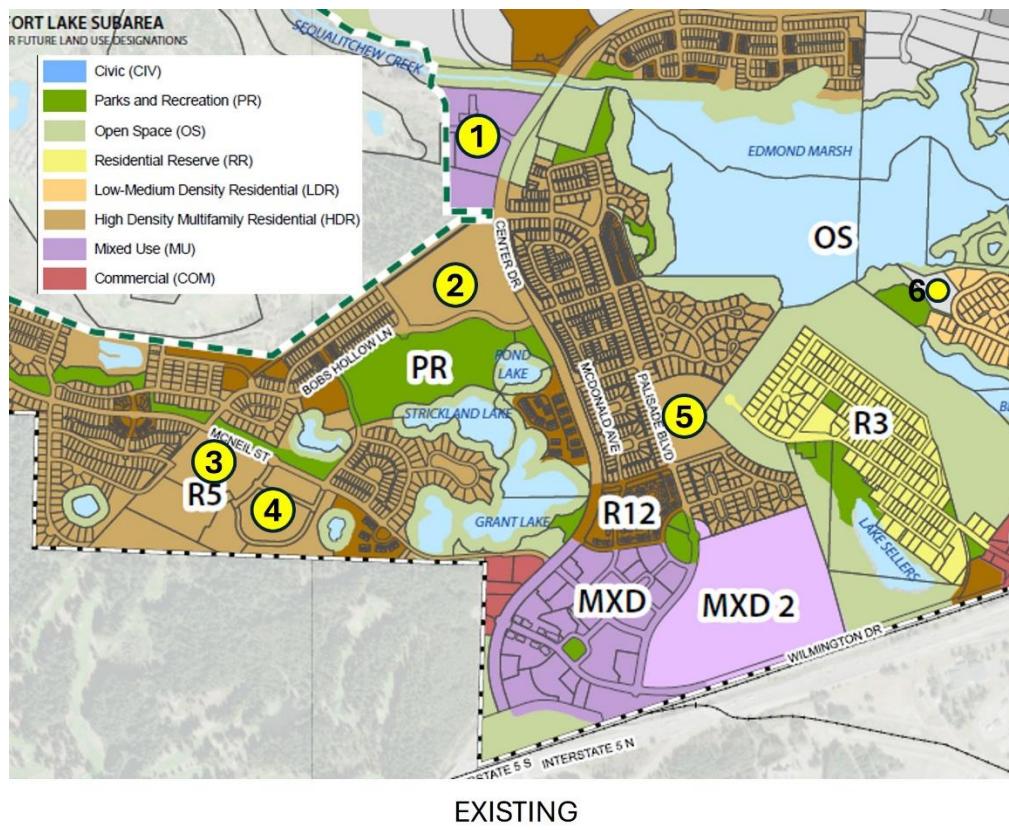
The parcels accessed by Manchester Place and bounded to the north by Center Drive (2) were redesignated from Manufacturing Research Park to High Density Residential. The reason for this change is the allowed uses in the MRP designation are not suitable for these parcels, due to critical area constraints, existence of several significant trees, existing parcel sizes, and adjacency to residentially designated parcels to the west. A multifamily development could be designed more flexibly than an industrial use to make the most efficient use of the property and better preserve the natural features.

Figure 2



The figure on the next page (Figure 3) focus on a broader area of the City and show various designation changes on “Existing” and “Proposed” maps, summarized in the captions to the right of the bottom part of the figure.

Figure 3



1. Change to Civic, due to the existing City Hall, Fire Department and Police Department facilities
2. Change to Civic, due to planned civic facility on this parcel (community center)
3. Change to Civic as this is a planned school site within the Patriots Landing Master Plan
4. Change to High Density Residential per Patriots Landing Master Plan
5. Change to Civic due to existing public school
6. Change to Civic due to existing City water tower site

Figure 4

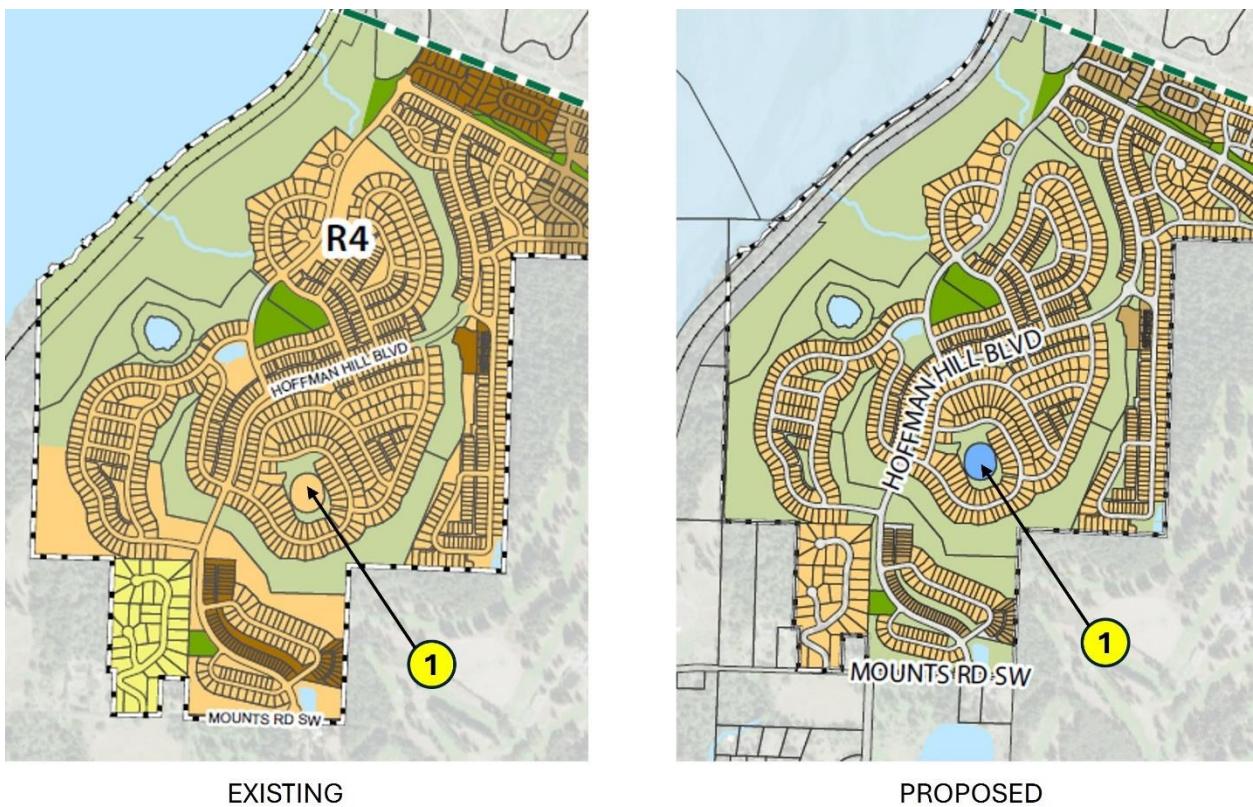


Figure 4 above shows a change to the Hoffman Hill water tower site (1) from Low Density Residential (left) to Civic (right), due to the water tower site being owned by the City for a civic purpose.

The overall Land Use policy direction has been to clarify the intent and add specificity to the policy wording and add and update policies addressing planning for growth; promoting public health, safety and welfare; ensuring development enhances the City's neighborhood environment and Historic Village; providing a street system that provides for all modes of transportation; promoting community equity and culture; and enhancing the environment.

The **Economic Development Element** includes goals and policies intended to support appropriate and advantageous economic growth and stability in DuPont. This element includes discussion of various strategies for economic development, such as the development of mixed-use projects and the expansion and retention of local businesses. New and updated policies in this element are intended to achieve a balance between equity, economic development, and environmental health; attract a diverse spectrum of commercial and industrial development projects; strengthening and integrating regional transportation infrastructure improvements; and encouraging a variety of marketing and tourism efforts that build on the City's assets.

The **Natural Environment Element** provides an inventory of Critical Areas within the City. DuPont consists of natural resources including Puget Sound shoreline, geology and soils, hillsides, urban forests, streams and wetlands, etc. These natural features support important regional species such as salmon. This element contains discussion and policies relating to conservation of natural resources, energy, and fish and wildlife habitat areas; water; critical areas such as wetlands, and groundwater protection areas; and clean air. It also briefly discusses the impacts of climate change, provides an

overview of hazard mitigation planning, and outlines new state regulatory requirements for the Comprehensive Plan climate element. Policies also focus on increasing protections and enhancements for the city's tree canopy.

The **Historic and Cultural Resources Element** includes a brief history of the City and outlines the city's guiding concepts for cultural resources. It also provides goals and policies to ensure that cultural and historic resources are protected, preserved, and promoted as the City develops. Several new policies are added that seek to capitalize on DuPont's historic and cultural resources through enhanced and local education and tourism opportunities; and establishing a process for identifying and designating cultural resources and sites.

The **Parks and Recreation Element** references the Parks, Recreation, and Open Space, and Trails Plan, and includes related goals and policies. The PROST Plan includes an inventory of existing parks, trails, and open space facilities; outlines projected need to adequately provide for the growing population – including park level of service standards. The City's PROS plan discusses and provides goals and policies to guide the development of park and recreation programming over the twenty-year planning horizon.

The **Housing Element** assesses the City of DuPont's current and future housing needs. It includes an inventory and analysis of the existing housing stock and existing housing conditions followed by strategies to meet future needs. It includes information on household characteristics such as median age, average household size, and median income; the City's housing inventory, age, and value, and the percentages of renter- and owner-occupied units. Housing cost burden is also discussed, which addresses housing cost as a percentage of household income.

The Housing Element is updated to include a discussion of the City's share of the regional housing targets with an analysis of existing and projected housing needs according to specific incomes levels. It references the LCA discussed earlier in this report. The requirement for development regulations to allow STEP (emergency shelters, transitional housing, emergency housing, and permanent supportive housing) is also discussed, pursuant to HB 1220. This element has also been updated to include the most recent data and meet newly adopted requirements for goals and policies.

Also pursuant to HB 1220, an appendix has been prepared analyzing the potential Racially Disparate Impacts (RDIs), as well as the risks of exclusion and displacement of households. Cities are now required to adopt measures aimed at addressing and reversing these harmful effects. The analysis concludes that there is insufficient data to draw conclusions on RDIs, displacement risks, or exclusions within the City of DuPont; however, data is presented which provides basic information on overall household cost burden within the City; the City's racial composition, and the number of households by race experiencing various levels of household cost burden.

Finally, several policies addressing recent changes to the GMA are included, such as those encouraging the production of "middle housing" (duplexes, triplexes, quads, stacked flats, cottage housing); production of housing adjacent to transit centers and employment; production of housing for various income bands; housing inclusivity; production of ADUs; and promoting development regulations that are non-exclusionary, and which avoid racially disparate impacts or disinvestment.

The **Transportation Element** sets a framework for the City of DuPont in understanding, prioritizing, measuring, and constructing a multimodal transportation network that supports communitywide mobility goals. Each element of the Comprehensive Plan, including Land Use, Housing, and Transportation, forms the policy basis for the Capital Facilities Plan. The Transportation Element's goals, policies, and implementation actions provide a roadmap for how DuPont will address future development and direct spending for capital facilities improvements associated with transportation.

The Transportation Element includes new and updated policies addressing regional collaboration on implementing projects that improve DuPont-Steilacoom Road and Mounts Road connections to I-5; fill gaps in sidewalks, trails, transit connectivity and bicycle facilities; and providing investments in efficient and complementary transportation networks.

The **Capital Facilities and Utilities Element** consists of an inventory of current capital facilities owned by public entities and private/public utilities, shows locations of existing facilities, and provides goals and policies for ensuring that facilities adequately support growth and maintain an appropriate Level of Service. This element also includes a six-year plan to finance capital facilities within the projected funding capacities and clearly identifies sources of public funds for such purposes. The element strengthens fiscal sustainability through capital facilities project planning. This element has been updated based on recent data and any new applicable requirements.

C. SUMMARY OF SEPA PROCESS

City Council approval of amendments to the Comprehensive Plan are subject to a State Environmental Policy Act (SEPA) review process. The City has opted to process a Determination of Nonsignificance (DNS) as a non-project action. A non-project action means that no specific development project is proposed; however, a non-project action includes proposed ordinances, regulations, plans and programs, including a Comprehensive Plan amendment.

The DNS process included preparation of a SEPA environmental checklist, which included a summary of the Comprehensive Plan, a statement of objectives, and a discussion of the purpose and need for the update.

D. DECISIONAL CRITERIA FOR PLAN AMENDMENT PROPOSALS

DMC 25.170.100 provides the framework for the City to amend its Comprehensive Plan for assessing periodic updates to the Comprehensive Plan. The City shall monitor the Comprehensive Plan and regulatory procedures that implement the plan and may initiate amendments as needed for adoption. This assessment shall be based on, but is not limited to:

- a. Whether growth and development are occurring at a faster rate than envisioned in the plan; or

Analysis: Growth and development are not occurring at a faster pace than envisioned in the plan; however, population and housing growth targets assigned by Pierce County are higher than envisioned in the plan and must be accommodated in this amendment.

- b. Whether the capacity to provide adequate services is diminished or increased; or

Analysis: In meeting the assigned growth targets in housing and population, the amendment provides policies to assure that with future growth, plan provides adequate level of service standards to support anticipated growth in demand.

- c. The availability of land to meet demand; or

Analysis: The Pierce County Buildable Lands Report (BLR) identified a capacity for 1,150 new residential units in the City. This is less than the housing growth target of 2,096 assigned to the City through the Pierce County countywide planning policies. The Old Fort Lake Subarea Plan was amended after completion of the BLR and added additional housing capacity of 2,208 units. Moreover, increased capacity was achieved through changing the land use designations of the industrial parcels discussed previously. Along with additional capacity identified within existing mixed use and commercial areas of the City, a total capacity for 5,936 housing units was identified, exceeding the target housing growth of 2,096 units. Therefore, adequate land is available to meet growth targets.

- d. Assumptions upon which the plan is based are found to be invalid; or
Not applicable
- e. The effect of the plan on land values and housing is contrary to the plan goals; or
Not applicable
- f. A determination that sufficient change or lack of change in circumstances dictate the need for a recommended amendment; or

Analysis: Periodic updates to the Comprehensive Plan are required by the Growth Management Act, on a ten-year cycle. DuPont is at the end of its current 10-year cycle, which is a change in circumstance dictating the need for the amendment.

- g. A determination that a question of consistency exists between the Comprehensive Plan and Chapter 36.70A RCW, the County-Wide Planning Policies for Pierce County, and Vision 2050: Growth Management and Transportation Strategy for the Central Puget Sound Region.

Analysis: It is incumbent on the City to review and make amendments to ensure consistency the GMA, the County-Wide Planning Policies, and Vision 2050. Several changes have been made to these plans, particularly with regard to the provision of housing, that necessitate changes to the Comprehensive Plan. Specific examples include a new requirement for the periodic update, established by HB1220, that specific housing development capacity be identified for moderate, low, very low, and extremely low-income households. A requirement for middle to provide capacity for middle-density housing; focusing growth adjacent to high-capacity transit stations; and identifying and undoing local policies and regulations that result in racially disparate impacts are other examples, all required by Vision 2050's multicounty planning policies.

E. CONCLUSION

Based on the need for the Comprehensive Plan to accommodate growth targets assigned by Pierce County, the provision of policies to assure adequate levels of service to support anticipated growth; the identified capacity to meet the growth targets; and the need to update the Comprehensive Plan to meet GMA requirements, amendments to the Comprehensive Plan are warranted, and the proposal complies with the decisional criteria in DMC 25.170.100.

F. Attachments

The following plans and documents are submitted for review:

1. Public Participation Plan
2. Record of the Planning Commission
3. Summary of Public Input (Nov 4 open house + poster boards from Library)
4. Draft Comprehensive Plan – Clean Copy
5. Draft Comprehensive Plan – Strikethrough/Underline Goals and Policies
6. DNS
