

MEMORANDUM

DATE: January 29, 2016

TO: Jack Dodge, Community Development Manager – City of Pacific

FROM: Kevin Gifford, AICP – Senior Associate; Lisa Grueter, AICP – Manager

RE: City of Pacific Growth Targets and Land Capacity Analysis

INTRODUCTION

The City of Pacific is in the process of updating its Comprehensive Plan and extending its adopted 2030 population and employment growth targets to the year 2035. Based on previous buildable lands analyses and growth projections, the City does not have sufficient growth capacity to meet its targets. The City is also engaged in an application for designation of a regional Manufacturing/Industrial Center in partnership with the City of Sumner, and the ability to meet growth targets is critical to the approval of this application.

This memorandum reviews the assumptions underlying Pacific’s land capacity analysis, evaluates the potential for reducing the City’s 2035 growth target in light of changing regional growth patterns, and examines whether the City of Sumner would have capacity to absorb additional future growth to alleviate demands on Pacific’s developable land base.

POPULATION AND EMPLOYMENT TARGETS

Because of its location in both King and Pierce Counties, the City of Pacific is required to meet adopted population and employment growth targets for both counties. In general, the portion of Pacific that lies in King County is mostly residential in nature, while the Pierce County portion of the city is entirely occupied by commercial, industrial, and open space uses. The following sections describe the adopted growth targets for each county and the City’s additional population and employment needs.

Pierce County Adopted Growth Targets

The Pierce County Council established a 2030 employment growth target of 6,505 jobs for the City of Pacific; because Pacific has no residential lands in Pierce County, the County has not adopted a population growth target for Pacific.

Exhibit 1 shows the City’s adopted 2030 employment target, as well as an estimate of existing employment as of 2010, as reported in the 2014 Pierce County Buildable Lands Report (Pierce County BLR) and the additional employment growth necessary to meet the adopted 2030 target of 6,505 jobs.

Exhibit 1. City of Pacific Employment Needs – Pierce County

2010 Total Employment Estimate	Adopted 2030 Total Employment Target	Total Employment Growth (2010-2030)	Adjusted Employment Growth ¹	Displaced Employees	Additional Employment Needs
2,071	6,505	4,434	3,897	227	4,124

1. Per 2014 Pierce County BLR report, total employment allocation is reduced by 12.1% to account for mobile workers and employees working from home.

Source: Pierce County BLR 2014

As shown above, Pacific needs 4,124 additional jobs to meet its 2030 employment target. In addition, the City is required to plan for additional growth through its current 20-year planning period, which extends through 2035. If we estimate 2035 employment needs based on a “straight-line” projection of the 2010-2030 growth trend, Pacific would need an additional 1,031 jobs from 2030-2035, for a total 2035 employment target of 7,227 jobs. There is no recommended interjurisdictional method among Pierce County jurisdictions to extend the targets for the 2030-2035 timeframe.

King County Adopted Growth Targets***Housing***

According to the 2014 King County Buildable Lands Report (King County BLR), the City of Pacific’s housing growth target for the 2006-2031 period is 285 additional units. From 2006-2012, 144 new housing units permitted, leaving 141 new units to be accounted for between 2012 and 2031. A straight-line projection of the 2006-2031 target to 2035 results in the need for 46 new housing units between 2031 and 2035 (consistent with the recommended approach of the King County Interjurisdictional Team). Exhibit 2 shows Pacific’s 2006-2035 housing growth needs.

Exhibit 2. City of Pacific Housing Needs – King County

2006 Housing Unit Estimate	2006-2031 Net Growth Target	New Housing Units 2006-2012	Remaining Growth Target 2012-2031	Estimated Net Growth Target 2031-2035	2012-2035 Additional Housing Need
2,216	285	144	141	46	187

Source: King County BLR 2014

Employment

According to the 2014 King County BLR, the City of Pacific’s employment growth target for the 2006-2031 period is 370 additional jobs. From 2006-2012, Pacific experienced an employment loss of 788 jobs, increasing the amount of employment growth needed between 2006 and 2031 to 1,158 jobs. A straight-line projection of the original 2006-2031 target to 2035 (consistent with the recommended approach of the King County Interjurisdictional Team) results in the need for 59 new jobs between 2031 and 2035. Exhibit 3 shows Pacific’s 2006-2035 employment growth needs. The 2014 King County BLR assumes that the 788 jobs lost would reoccupy their original space. Thus, the City’s job need based on land capacity for new employment space equals 429 jobs.

Exhibit 3. City of Pacific Employment Needs – King County

2006 Employment Estimate	2006-2031 Net Growth Target	Net Job Loss 2006-2012	Remaining Growth Target 2012-2031	Estimated Net Growth Target 2031-2035	2012-2035 Additional Job Need
1,601	370	-788	1,158	59	1,217

Source: King County BLR 2014

AVAILABLE LAND CAPACITY

Available land capacity in Pacific is documented in the King County and Pierce County 2014 BLRs. These reports analyze the amount of land that is available for development, either vacant or redevelopable, and calculate the amount of employment that can be accommodated based on adopted zoning regulations and allowed and achieved housing and employment densities in the region. The following sections summarize the findings of the Pierce County and King County BLRs regarding development capacity in Pacific.

2014 Pierce County Buildable Lands Report

Exhibit 4 shows the net developable acreage (after exclusion of environmentally sensitive areas unsuitable for development), employment density assumptions, and overall employment capacity for the City of Pacific, as documented in the 2014 Pierce County BLR.

Exhibit 4. City of Pacific Employment Capacity – Pierce County

Type	Zoning District	Net Acres	Employees per Acre	Employment Capacity
Commercial	C	32.23	19.37	624
Industrial	LI	103.40	8.25	853
	OP	18.61	8.25	154
Total Employment Capacity				1,631

Source: Pierce County BLR 2014

As shown above, the Pierce County BLR shows a total employment capacity for Pacific of 1,631 jobs. This represents a deficit of **2,493** jobs compared to the City's adopted 2030 employment target. When compared to the projected 2035 employment target described in the previous section, this deficit increases to **3,525** jobs, as shown below in Exhibit 5.

Exhibit 5. Comparison of Employment Targets and Capacity – Pierce County

2010 Employment Capacity	2010-2030 Employment Growth Target	2030 Surplus/Deficit	2010-2035 Employment Growth Target	2035 Surplus/Deficit
1,631	4,124	-2,493	5,156	-3,525

Source: Pierce County BLR 2014

2014 King County Buildable Lands Report

Exhibit 6 shows the City of Pacific’s housing and employment growth capacity, compared to their 2031 growth targets, as documented in the 2014 King County BLR. The table also compares current development capacity with the projected 2035 growth targets described in the previous section.

Exhibit 6. Comparison of Growth Targets and Capacity – King County

Category	2012 Capacity	2012-2031 Growth Target	2031 Surplus/Deficit	2012-2035 Growth Target	2035 Surplus/Deficit
Housing	416 ¹	141	275	187	229
Employment	1,188 ²	1,158	30	1,217	-29

1. 2006 reported capacity of 560 units reduced by 144 to account for development permitted 2006-2012.

2. 2012 reported capacity of 400 jobs increased by 788 to account for 2006-2012 job loss. Empty job spaces can be refilled.

Source: King County BLR 2014; King County IJT Technical Memo on Growth Targets, June 2013; BERK Consulting 2016

As shown in Exhibit 6, Pacific has sufficient capacity to meet housing growth targets for both 2031 and 2035. Pacific has sufficient capacity to meet its employment growth target for 2031, but it has a small employment capacity deficit by 2035.

BERK ASSESSMENT

This section describes the analysis performed by BERK to determine how the City of Pacific can address the projected employment deficits described in the previous sections. Our analysis focused on the following:

- Examining the assumptions behind the land capacity calculations reported in the BLRs to determine if the identified vacant and redevelopable land could support development at higher employment densities assumed in the reports; and
- Re-evaluating the 2035 growth targets for Pacific and the neighboring City of Sumner in light of guidance from the Puget Sound Regional Council that future growth in the region is likely to shift toward a greater focus on larger cities and metropolitan centers, rather than small cities like Pacific and Sumner.

Buildable Lands Analysis

Buildable lands analysis is based on approximately eight steps illustrated in Exhibit 7. Steps include identifying vacant and underutilized lands, deducting critical areas and land needed for rights of way and public facilities, and applying assumed densities or floor area ratios and employee square footage rates. Some assumptions differ in the King County and Pierce County BLR such as market factor assumptions (i.e. land unavailable for development) and application of employee rates. This memo focuses on Step 8 assumptions.

Exhibit 7. Land Capacity Steps

Step 1	Step 2	Step 3	Step 4	Step 5	Step 6	Step 7	Step 8
Identify Vacant Parcels	Identify Underutilized or Redevelopable Parcels by Zone	Deduct Areas Impacted by Critical Areas	Deduct Future Roads/R-O-W Needs	Deduct Future Public Facilities Needs	Deduct Capacity to Account for Market Factor	Based on All Factors to Estimate Net Buildable Acres by Zone	Apply assumed densities to residential acres Apply floor area ratios to buildable acres and use employee rates to determine employment capacity

Source: BERK Consulting 2016

Review of the employment density assumptions for Pacific's commercial zones, as documented in the Pierce County BLR and included in Exhibit 4, indicated that the assumed employment densities may underestimate the true development capacity of the identified vacant and redevelopable lands. For example, the BLR assumes 8.25 employees per acre for Pacific's Light Industrial and Office Park zones, while the same report assumes 11.33 employees per acre for comparable industrial lands in adjacent Sumner.¹

To develop an alternate set of assumptions, BERK reviewed both the Pierce County BLR's description of achieved employee densities in Pacific in previous years and the *Draft City of Sumner and City of Pacific Manufacturing/Industrial Center Designation Report and Plan*, prepared in 2009 by Community Attributes. The draft report includes an evaluation of industrial development capacity for the proposed Manufacturing/Industrial Center (MIC), based on a survey of employment densities in comparable industrial areas in the region. The MIC study concludes that a reasonable range of employment intensity for industrial development in the Sumner-Pacific area would be floor area ratios (FARs) of 0.21-0.26 at a density of one employee per 800-1,000 square feet of building area.

In addition, the 2014 Pierce County BLR documents commercial and industrial development activity reported by the City of Pacific to Pierce County. While no reporting information was available for the period 2008-2012, the report includes summaries for the years 2006 and 2007. Exhibit 8 summarizes the developed acreages reported and the average FAR achieved for the Commercial and Office Park zones.

The King County BLR for 2014 advanced assumptions collected in 2007. In 2007 BLR worksheets, square footages per employee equaled 650-800 square feet per industrial (LI) employee, similar to the MIC study low-range of 800 square feet. Additionally, the 2007 BLR worksheet estimated 400 square feet per employee for the OP zone and 500 square feet per employee for the Commercial zone. These King County BLR employee rates are applied along with the FAR results in the Pierce County BLR with more recent permit activity.

Exhibit 8. Summary of Commercial and Industrial Development Activity in City of Pacific – Pierce County

Zone	2006		2007		FAR (Weighted Average)
	Acres	FAR	Acres	FAR	
C	0	0	1.52	0.27	0.27
OP	6.52	0.23	2.86	0.37	0.27

Source: Pierce County BLR 2014

¹ The City of Sumner prepared its own capacity analysis and used 0.26 floor area ratio and 1,000 square feet per industrial employee. This is effectively 11.33 employees per acre.

Applying these FAR and employment density assumptions to Pierce County’s parcel-based buildable lands model for Pacific resulted in an increase in employment capacity of 1,144 jobs, as shown in Exhibit 9.

Exhibit 9. City of Pacific Employment Capacity – Pierce County

Type	Zoning District	Floor Area Ratio ¹	Square Feet per Employee ²	Equivalent Employees per Acre ³	2014 BLR Reported Employment Capacity	Updated Employment Capacity
Commercial	C	0.27	500	23.52	624	758
Industrial	LI	0.26	800	14.16	853	1,464
	OP	0.27	400	29.7	154	553
Total Employment Capacity					1,631	2,775

¹ Based on City permits reported in 2014 Pierce County BLR.

² Based on King County 2007 and 2014 BLR assumptions for C and OP, and 2009 MIC Study for LI.

³ The employees per acre are equivalent to the application of floor area ratio assumptions and square feet per employee.

Source: Pierce County BLR 2014 and BERK Consulting 2016

While the 2014 Pierce County BLR did not have permit information for some later years, the City has prepared an estimate of employees per acre using business license information, illustrating that the assumptions included in the analysis are supportable. See Attachment A.

Employment Target Adjustments

In addition to evaluating the buildable lands analysis assumptions, BERK examined the projected 2030-2035 growth targets for Pacific and Sumner. Guidance from PSRC indicates that current Pierce County 2030 growth targets anticipate that PSRC-classified Small Cities (which includes Pacific and Sumner) will absorb approximately 19% of future regional growth. However, based on the Regional Growth Strategy of VISION 2040, PSRC anticipates that Small Cities in Pierce County would instead absorb approximately 15% of future regional growth, which means that projecting a 2035 growth target based on a straight-line extension of current 2030 growth targets may overstate the amount of growth Pacific and Sumner will need to accommodate.

To evaluate the impact of this reduction in projected growth on future growth targets, BERK projected forward the adopted 2008-2030 employment targets established by Pierce County and calculated the share of the Small Cities target for which Pacific and Sumner are responsible, as shown in Exhibit 10 below. Having established the net growth for all Small Cities over 2008-2030 period, 2030-2035 growth was estimated using a straight-line projection to establish a baseline.

Exhibit 10. 2035 Straight-Line Projection vs. Reduced Trend Projection

Category	2008 Employment	Pierce County 2030 Total Target	Share of Small Cities Target	2008-2030 Net Growth	2030-2035 Net Growth (Straight-line)	2030-2035 Net Growth (Adjusted)	Percent 2030-35 Target Retained
Small Cities	40,343	67,985	-	27,642	6,282	4,960	0.79
Pacific	2,529	6,505	9.57%	3,976	904	475	0.53
Sumner	10,828	20,135	29.62%	9,307	2,115	1,469	0.69

Source: Pierce County Ordinance 2011-36s and BERK Consulting 2016

Assuming that the straight-line 2030-2035 employment growth estimate for the Small Cities category represents 19% of total employment growth in Pierce County over that time period, BERK calculated a new 2030-2035 growth estimate based on a 15% share, holding total County employment growth constant.

$$\text{Adjusted Net Growth} = (\text{Straight Line Net Growth} / 0.19) \times 0.15$$

Comparing the new adjusted net growth numbers to the straight-line projection for each geography produces a reduction factor that can be applied to the 2035 growth targets described earlier in this memorandum. Exhibit 11 shows the comparison between 2035 growth targets derived using the straight-line method and the reduced trend method.

Exhibit 11. Adjusted 2035 Pierce County Employment Growth Targets

City	Method	2010 Employment	2030 Adopted Target	2010-2030 Net Growth Target ¹	2030-2035 Growth Target	2010-2035 Net Growth Target	2035 Total Employment Target
Pacific	Straight-line	2,071	6,505	4,124	1,031	5,156	7,227
	Trend	2,071	6,505	4,124	542	4,666	6,737
Sumner	Straight-line	9,825	20,135	9,308	2,327	11,636	21,461
	Trend	9,825	20,135	9,308	1,616	10,925	20,750

1. Per 2014 Pierce County BLR report, total employment allocation is reduced by 12.1% to account for mobile workers and employees working from home.

Source: Pierce County BLR 2014 and BERK Consulting 2016

Pierce County Employment Capacity Transfer

Based on the revised employment capacity calculations and the adjusted 2035 growth targets described in the previous two sections, Pacific's employment capacity and target are closer in balance, though a deficit would remain. This remaining deficit could potentially be alleviated by transferring a portion of its 2035 growth target to the City of Sumner. Considering the City's land capacity and the adjusted 2035 growth target, Sumner is anticipated to have excess capacity in both 2030 and 2035 and could absorb the additional growth target unaccommodated by the City of Pacific, as illustrated in Exhibit 12.

Exhibit 12. 2030 and 2035 Employment Capacity Comparison – Pacific and Sumner

City	2010-2030 Growth Target	2030-2035 Adjusted Growth Target	Adjusted Employment Capacity	2030 Surplus/ Deficit	2035 Surplus/ Deficit
Pacific	4,124	542	2,775	-1,349	-1,891
Sumner	9,308	1,616	12,894	3,586	1,969

Source: Pierce County BLR 2014; BERK Consulting 2016

As shown in Exhibit 11, Sumner’s employment capacity can accommodate Pacific’s target deficit of -1,349 by 2030, which would decrease Sumner’s surplus to 2,236 jobs. By 2035, Sumner can accommodate Pacific’s target deficit of 1,891, decreasing Sumner’s capacity surplus to 78 jobs.

Exhibit 13 identifies the target adjustments that would need to be adopted by the Pierce County Council and reflected in an amended BLR.

Exhibit 13. 2030 and 2035 Employment Target Adjustments – Pacific and Sumner

A. Pacific Target Adjustment

	2010 Total Estimate	2030 Adopted Total Target	2010-2030 Growth Target	Adjusted Growth Target, 2010-2030	Displaced Employees	2010-2030 Growth Target, Final Adjusted ¹	2035 Growth Target Extension ²	2035 Total Target	2010-2035 Growth Target	Capacity (2014)	2030 Surplus/Deficit	2035 Surplus/Deficit
Straight-Line Method	2,071	6,505	4,434	3,897	227	4,124	1,031	7,227	5,156	2,775	(1,349)	(2,381)
Trend Reduction Method	2,071	6,505	4,434	3,897	227	4,124	542	6,737	4,666	2,775	(1,349)	(1,891)
Adjusted Target	2,071	4,291	2,220	1,951	227	2,178	542	4,791	2,720	2,775	597	55

B. Sumner Target Adjustment

	2010 Total Estimate	2030 Adopted Total Target	2010-2030 Growth Target	Adjusted Growth Target, 2010-2030	Displaced Employees	2010-2030 Growth Target, Final Adjusted ¹	2030-2035 Extension	2035 Total Target	2010-2035 Growth Target	Capacity	2030 Surplus/Deficit	2035 Surplus/Deficit
Straight-Line Method	9,825	20,135	10,310	9,062	246	9,308	2,327	21,461	11,636	12,894	3,586	1,258
								<i>After accepting Pacific target transfer:</i>			2,236	(633)
Trend Reduction Method	9,825	20,135	10,310	9,062	246	9,308	1,616	20,750	10,925	12,894	3,586	1,969
								<i>After accepting Pacific target transfer:</i>			2,236	78
Adjusted Target	9,825	22,349	12,524	11,009	246	11,255	1,616	22,696	12,871	12,894	1,639	23

1. Per 2014 Pierce County BLR report, total employment allocation is reduced by 12.1% to account for mobile workers and employees working from home.

Source: Pierce County BLR 2014; BERK Consulting 2016

King County Employment Adjustments

As described in the discussion of available land capacity, the portion of the City of Pacific that lies in King County would have an employment capacity deficit of approximately 29 jobs in 2035, based on the assumptions of the 2014 King County BLR. The 2014 BLR carried forward the assumptions used in the 2007 BLR, applying a FAR of 0.2 to industrial zones and assuming 650 square feet per employee for vacant properties and 800 square feet per employee for redevelopable lots.

By re-evaluating these employment density assumptions, similar to the method used for Pierce County, additional employment capacity is available. Applying a consistent industrial FAR assumption of 0.26, as previously described in the 2009 MIC Study, and using an average of the 650-800 square feet per employee range, would result in capacity for an additional 45 employees in the King County portion of Pacific, which is sufficient to overcome the projected deficit. The adjustment is shown below in Exhibit 14.

Exhibit 14. King County Employment Capacity Adjustments

	2012 Zoned Capacity	2006-2012 Job Loss Adjustment ¹	2012 Total Capacity	2012- 2031 Growth Target	2031 Surplus/ Deficit	2012-2035 Growth Target	2035 Surplus/ Deficit
2014 BLR	401	788	1,188	1,158	30	1,217	-29
Adjusted FAR Method	446	788	1,234	1,158	76	1,217	17

1. 2014 BLR reports 788 jobs lost 2006-2012. Empty job spaces can be refilled, so this capacity remains available.

Source: King County BLR 2014; King County IJT Technical Memo on Growth Targets, June 2013; BERK Consulting 2016

MANUFACTURING INDUSTRIAL CENTER (MIC) REQUIREMENTS

The Cities of Sumner and Pacific are requesting designation of a MIC addressing all of Sumner's M-1 and M-2 zones, light and heavy industrial respectively. Pacific has designated a portion of its LI zone with a MIC overlay.

The requirements for the MIC designation include:

- Compatibility with VISION 2040.
- Required Activity Levels:
 - Existing employment level of at least 10,000 jobs.
 - Target employment level of at least 20,000 jobs. (Based on the jurisdiction's adopted growth target.)
- At least 80% of property within the proposed MIC must have planned future land use and current zoning designation for industrial and manufacturing uses.
- Jurisdiction must address each topic in the MIC Plan Checklist in their subarea plan.

Based on existing jobs as well as the land capacity analysis above, following are the results showing that by 2035, total employment will include 20,000 jobs.

Exhibit 15. MIC Employment Capacity – Growth through 2035

Type	Zoning District	City-Based Capacity Assumption
Pacific Industrial	LI – MIC Overlay	1,047
Sumner Industrial¹	M1 – all MIC	9,140
	M2 – all MIC	334
Total Employment Capacity		10,521
Existing Jobs 2010		10,000²
Total Jobs 2035		20,521

1 Based on City of Sumner Land Capacity developed in 2010, as updated with Sumner Meadows docket approval in 2014 (addition of 3,040 jobs). The BLR did not account for the Sumner Meadows docket application as it post-dated the timeframe of the BLR, but is otherwise similar in results as Sumner's Land Capacity analysis.

2. 2010 employment estimate pending verification. 2009 MIC Study estimated 9,470 employees as of 2008. PSRC staff has recently re-analyzed the employment levels in the Sumner-Pacific MIC, and the 2014 estimated employment (covered) was 10,190 jobs.

Source: Pierce County Buildable Lands Report 2014; BERK 2016

CONCLUSIONS

Regarding Pierce County Targets and Capacities

As documented in this memorandum, a combination of techniques can be applied to accommodate the next 20 years of growth in the Pacific-Sumner area and achieve successful designation of the Sumner-Pacific MIC.

- Increased employment density assumptions allow Pacific to provide additional land capacity beyond what is documented in the latest Pierce County BLR.
- While a straight-line projection is a common method there is no recommended method among Pierce County jurisdictions to extend targets beyond the year 2030 adopted by the Pierce County Council. Regionally, VISION 2040 provides a growth strategy and there are PSRC recommendations on bending the trend towards the Regional Growth Strategy. The role of Small Cities in absorbing regional growth is changing. As large metropolitan centers capture a greater share of regional growth in the future, Small Cities like Pacific and Sumner will experience lower levels of growth than has been previously projected. Future growth targets can therefore be reduced to reflect this trend.
- While Pacific has insufficient capacity to meet current growth targets, Sumner has excess capacity throughout its planning period and could potentially absorb additional growth beyond its adopted targets. Increasing Sumner's 2010-2035 net growth target by approximately 2,000 jobs would alleviate Pacific's projected deficit.

Regarding King County Targets and Capacities

The City of Pacific has sufficient housing capacity to meet its housing growth target at 2031 and 2035 (using a straight-line method recommended by the King County Interjurisdictional Team).

The King County employment growth target for employment, 2012-2031 can be met by the City's land capacity. A small deficit could occur at 2035 if the target is extended using the straight-line method recommended by the King County Interjurisdictional Team, and if there are no changes in the 2014 King

County BLR floor area ratios. However, based on revised employment floor area ratios documented in the 2014 Pierce County BLR, the City of Pacific could meet its King County employment growth target by 2035.

Attachment A: Sample Employees per Acre – Pierce County

Based on Business License information

Property Address	Zoning	Size of Lot	No. of Employees	Employees per Acre
120 130 140 County Line Rd. *Vacant Space Still Available	OP	2.85 Ac	6-12 2-10 <u>26-50</u> 34-72	11.9 to 25.2
767 Valentine	OP	1.65	51+	30.9
1091 Valentine Ave SE	C	.33	15	45.4
1089 Valentine Ave SE	C	.33	6-12	18.1 to 36.3
1188 Valentine Ave SE	C	.43	7-17	16.2 to 39.5
175 Roy Rd. Bldg. C Suite A	LI	1.04	25-50 51+	73 to 97.1
1223 Valentine Ave. SE	LI	1.9	26-50	13.6 to 26.3
1463 Valentine Ave. SE	LI	2.8	26-50	9.2 to 17.8
1334 Thornton Ave. SW	LI	1.9	26-50	13.6 to 26.3
111 Nyberg Rd. SW	LI	2.0	51+	25.5
1050 Butte Ave. E.	LI	1.93	26-50	13.4 to 25.9
251 Roy Rd SW	LI	3.4	51+	15
115 Roy Rd SW	LI	2.85	51+	17.8
1335 Valentine Ave SE	LI	2.09	30-50	14.3 to 23.9
1374 Valentine Ave SE	LI	1.4	13-25	9.2 to 17.8
1433 Valentine Ave. SE	LI	1.56	39-75	25 to 48
1350 Thornton Ave. SW	LI	1.9	19-37	10 to 19.4
951 Valentine Ave. SE	LI	.24	1-5	4.1 to 20.8