

Comprehensive Plan Update

Agency Comment Review

City Council Meeting

Monday, September 9th, 2024

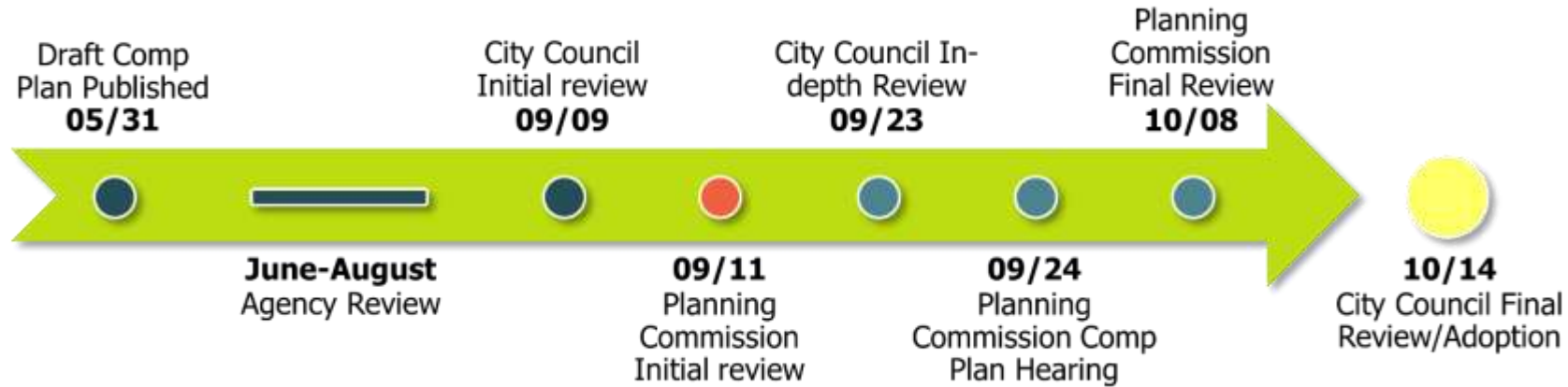
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Background

The City has received comments from reviewing agencies and can begin to address received comments and revising the Draft Comprehensive plan in preparation for adoption, currently targeted in October.





Levels of Review

Agency reviews can be categorized into three levels of review, and each should be considered according to their jurisdiction and requirements outlined in the Growth Management Act (GMA)



State Level Review



Regional Level Review



Local Level Review



State Level Review

Reviews plan compliance with the Growth Management Act (RCW Chapter 36.70a).

Includes:

- ▶ Washington State Department of Commerce (Commerce),
- ▶ Washington State Department of Fish and Wildlife (WDFW), and
- ▶ Washington State Department of Ecology (WADOE)





Regional Level Review

Reviews plan consistency with regional and county-wide plans under RCW 36.70A.100

Includes:

- ▶ Includes Puget Sound Regional Council (PSRC) and
- ▶ King County Affordable Housing Commissions (KCAHC)



Puget Sound Regional Council



King County



Local Level Review

Reviews provide feedback on community issues & priorities. Includes:

- ▶ local tribes,
- ▶ community-based organizations, and
- ▶ public comment





Current Summary of Comments:

Comments were received on many parts of the Draft Comp Plan and some comments were more generally provided for the entire Comp Plan update.

LDC has reviewed and compiled the received comments and identified the following major items requiring action on the part of the City in the following elements:

Chapter 1 - Land Use

Chapter 2 - Natural Environment

Chapter 4 - Housing

Chapter 5 - Transportation & Circulation

Chapter 7 - Capital Facilities



Land Use Element Comments

The draft Land Use Element received some agency comments from Commerce, WDFW, and PSRC. The most pressing comments were relating to the 2021 Washington State Wildland Urban Interface Code.

Wildland Urban Interface

The City needs to incorporate concerns for Wildland Urban Interface in the Comprehensive Plan as identified in the GMA.

Commerce Comment – *“Commerce recommends the addition of wildfire preparedness and fire adaptation measures in the land use element with identification of specific procedures as required by RCW 36.70A.070(1).”*

State – RCW 36.70A.070(1) *“...The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools, which may include, but are not limited to, adoption of portions or all of the wildland urban interface code...”*





Natural Environment Element Comments

The City received some agency comments from WDFW and PSRC applicable to the draft Natural Environment Element. These primarily concerned issues related to Climate Change and Habitat Preservation.

Climate Change

PSRC Comment - “The city should consider identifying specific hazards to the community related to climate change... This identification may be required by HB 1181 in 2029.”

State – RCW 36.70A.020(14) *“Climate change and resiliency. Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies ... adapt to and mitigate the effects of a changing climate; ... prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards...”*



Housing Element Comments

The draft Housing Element received the most substantial agency comments with Commerce, PSRC, and KCAHC providing comments pertaining to the following subjects:

► **Affordable & Emergency Housing**

Commerce Comment – “ Thank you for identifying that the city has a capacity deficit. In your final housing element, please include and identify policy and regulatory changes that will allow for sufficient capacity to meet the city’s housing needs.”

► **Moderate Density Housing**

Commerce Comment – “With the new mandatory provisions from the state for moderate density housing options, RCW 36.70A.070(2)(b) requires jurisdictions to have policies for moderate density housing options including, but not limited to, duplexes. We recommend adding or adjusting a policy to incorporate these new statewide mandatory provisions.”

► **Racially Disparate Impacts (RDI)**

Commerce Comment – “The housing element is missing a review of local housing policies that may have led to racially disparate impacts (RDI), displacement, and exclusion in housing (RCW.70A.070(e)). Please include a policy evaluation in the housing element or as an appendix to the plan.”



Housing Element Comments

Affordable & Emergency Housing

Commerce Comment – *“ Thank you for identifying that the city has a capacity deficit. In your final housing element, please include and identify policy and regulatory changes that will allow for sufficient capacity to meet the city’s housing needs.”*

State – RCW 36.70A.070(2)(c) *“Identifies sufficient capacity of land for housing including, but not limited to... housing for moderate, low, very low, and extremely low-income households...”*

King County – CPP H-1 *“Plan for and accommodate the jurisdiction’s allocated share of countywide future housing needs for moderate-, low-, very low-, and extremely low-income households as well as emergency housing, emergency shelters, and permanent supportive housing.”*



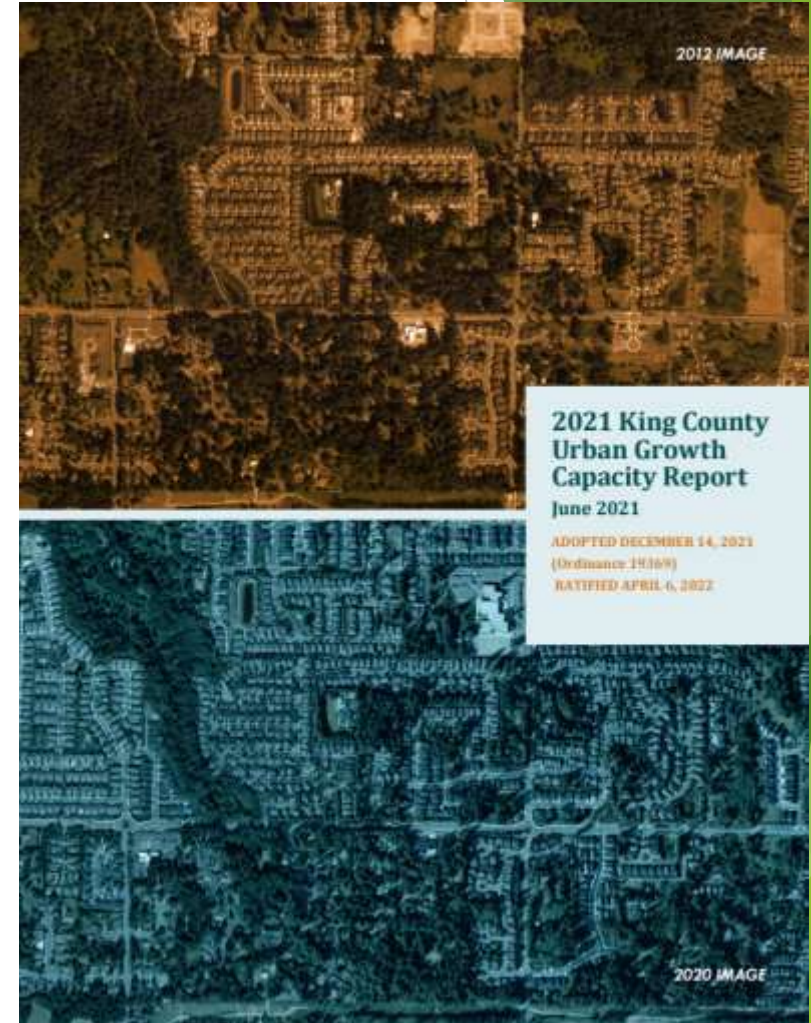
Land Capacity Analysis

Growth Targets

The City has an adopted target for 19 new housing units by 2044 in King County CPP H-1.

Permanent Housing Target (Units) by Affordability (AMI)								Emergency Housing Target (Beds)
0 - 30%		30 - 50%	50 - 80%	80 - 100%	100 - 120%	120% Plus	Total	
Non-PSH	PSH							
5	3	3	8	0	0	0	19	4

The 2021 Urban Growth Capacity Report identified the City had capacity for 8 new housing units.





Land Capacity Analysis

To plan for affordable housing, the City needs to adopt changes to its zoning and/or development regulations.

Potential for ADU development

The City has considerable potential for ADU development potential.

LDC researched the potential for Affordable ADUs development. The following issues were identified:

- ▶ No existing examples of policy supporting this type of development
- ▶ Report on middle housing affordability from ARCH suggests ADUs will not be naturally affordable

Affordable Housing Options

- ▶ Development on City property
- ▶ Tiny Homes
- ▶ Multi-family zoning



Housing Element Comments

Moderate Density Housing

Commerce Comment – *“With the new mandatory provisions from the state for moderate density housing options, RCW 36.70A.070(2)(b) requires jurisdictions to have policies for moderate density housing options including, but not limited to, duplexes. We recommend adding or adjusting a policy to incorporate these new statewide mandatory provisions.”*

State – RCW 36.70A.070(2)(b) *“Includes a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including ... moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes;”*

PSRC – MPP-H-9 *“Expand housing capacity for moderate density housing to bridge the gap between single-family and more intensive multifamily development and provide opportunities for more affordable ownership and rental housing that allows more people to live in neighborhoods across the region.”*



Housing Element Comments

Racially Disparate Impacts (RDI)

Commerce Comment – “The housing element is missing a review of local housing policies that may have led to racially disparate impacts (RDI), displacement, and exclusion in housing (RCW.70A.070(e)). Please include a policy evaluation in the housing element or as an appendix to the plan.”

State – RCW 36.70A.070(2)(e) *“Identifies local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, ...;(f) Identifies and implements policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions;”*

King County – MPP-H-5 *“Document the local history of racially exclusive and discriminatory land use and housing practices, consistent with local and regional fair housing reports and other resources... Demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices.”*

MPP-H-8 *“Collaborate with populations most disproportionately impacted by housing cost burden in developing, implementing, and monitoring strategies that achieve the goals of this chapter. Prioritize the needs and solutions articulated by these disproportionately impacted populations.”*

MPP-H-9 *“Adopt intentional, targeted actions that repair harms to Black, Indigenous, and other People of Color households from past and current racially exclusive and discriminatory land use and housing practices (generally identified through Policy H-5). Promote equitable outcomes in partnership with communities most impacted.”*



Transportation & Circulation Element Comments

The City received some agency comments from Commerce and PSRC applicable to the draft Transportation & Circulation Element. These primarily concerned issues related to Climate Change and Habitat Preservation.

Commerce Comment – *“We recommend and encourage jurisdictions being the process of working with regional partners and establishing a regional approach to the multimodal level of service standards (MMLOS).”*

State – RCW 36.70A.070(6)(a)(iii)(B) *“Multimodal level of service standards for all locally owned arterials, locally and regionally operated transit routes that serve urban growth areas, state-owned or operated transit routes that serve urban areas..., and active transportation facilities that serve as a gauge to judge performance of the system and success in helping to achieve the goals of this chapter consistent with environmental justice. These standards should be regionally coordinated.”*

State – RCW 36.70A.108 *“The transportation element required by RCW 36.70A.070 may include, in addition to improvements or strategies to accommodate the impacts of development authorized under RCW”*

MPP-T-10 *“Ensure mobility choices for people with special transportation needs, including persons with disabilities, seniors, youth, and people with low incomes.”*



Capital Facilities Element Comments

The City received some agency comments from Commerce applicable to the draft Capital Facilities Element. These primarily concerned issues related to Green Infrastructure.

Commerce Comment - “If the city has existing green infrastructure or is planning for the installation of green infrastructure, as defined in RCW 36.70A.030(21), please update the capital facilities element to reflect the inventory and/or plans in accordance with RCW 36.70A.070(3)(a).

State – RCW 36.70A.030(3)(a) "An inventory of existing capital facilities owned by public entities, including green infrastructure, showing the locations and capacities of the capital facilities;"



Conclusion and Questions

The City has received comments from State and Regional Level reviews and should begin addressing comments through revisions to the Draft Comprehensive Plan and development regulations.

