



CITY OF MEDINA

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MEMORANDUM

DATE: September 6, 2024

TO: Medina Planning Commission

FROM: Dane Jepsen, Planner, LDC Inc.

RE: Item 6.2 - 2024 Comprehensive Plan Update, Initial Comment Review from PSRC, King County and Dept. of Commerce

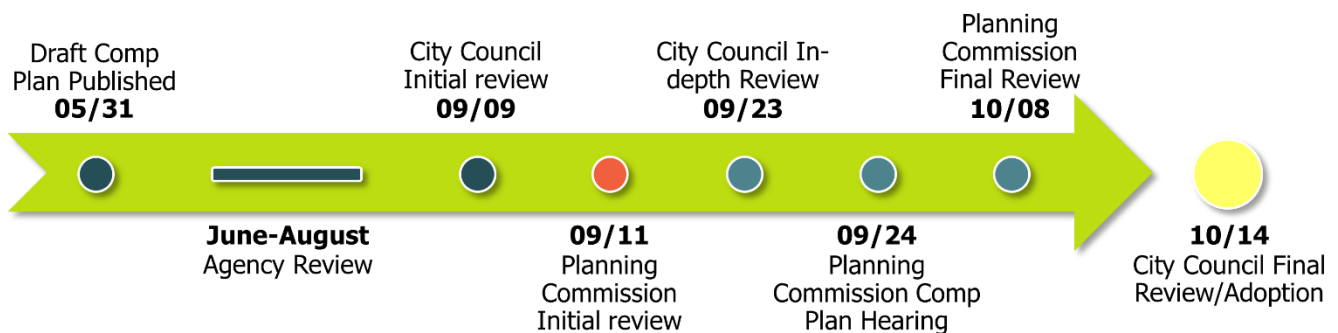
Executive Summary

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. These revisions are necessary to address issues of compliance with State regulations and consistency with Regional and county-wide plans. Major issues identified in preliminary review of the received comments include:

- Planning for Affordable Housing
- Assessment of Racially Disparate Impacts
- Further Incorporation of Climate Change Concerns

Background

On May 31st, 2024, the City finalized the first draft of its 2024 Comprehensive Plan and submitted it for review by public agencies and the general public. These reviews are then provided to the City for their consideration in the preparation of the Final Comprehensive Plan to be adopted before the end of the year.



Note that comments received from public agencies do not require direct responses; rather, these comments are meant to be provided prior to adoption for consideration/implementation then most agencies will review the Adopted Comprehensive Plan again when the City submits the 5-year implementation progress report.

Public reviews of the Draft Comprehensive Plan can be categorized into three levels of review in reference to the way the City must consider their comments:

- State Level Review
- Regional Level Review
- Local Level Review

State Level Review

Reviews plan compliance with applicable sections of the Growth Management Act¹ (GMA). This review is conducted by Washington State Department of Commerce (Commerce), Washington State Department of Fish and Wildlife (WDFW), and Washington State Department of Ecology (WADOE).

When reviewing comments from this level of review, pay close attention to matters of plan compliance.

Regional Level Review

Reviews plan consistency with regional and county-wide plans under [RCW 36.70A.100](#). This review is conducted by regional planning organizations, like the Puget Sound Regional Council (PSRC), and King County through the King County Affordable Housing Commission (KCAHC). Each of these reviews are primarily focused on each body's associated plan, for PSRC this is Vision 2050 and the Multi County Planning Policies (MPPs), for KCAHC this is the King County Countywide Planning Policies (CPPs).

When reviewing comments from this level of review, pay close attention to matters of plan consistency; reviewing agencies may identify issues of compliance but they are not the final authority on these issues and their advice should be reviewed for accuracy and applicability.

Local Level Review

Reviews plan coordination with community and neighbors including public participation (required under [RCW 36.70A.035](#) & [RCW 36.70A.140](#)), tribal coordination (required under), and coordination with other adjacent uses (required under [RCW 36.70A.530](#) & [RCW 36.70.547](#)).

This review is conducted by local tribes, community-based organizations, neighboring public uses, and the general public.

When reviewing comments from this level of review, it is important to pay attention to concerns and intent; if a valid concern is expressed that is not currently addressed in the plan it should be considered. Coordination with entities such as Tribes, military installations, and airports, should be carried out according to their provisions in the GMA.

Review Summary

So far, the City has received public reviews from the following agencies:

- Washington State Department of Commerce (Commerce) – State Level Review
- Washington State Department of Fish & Wildlife (WDFW) – State Level Review
- Puget Sound Regional Council (PSRC) – Regional Level Review
- King County Affordable Housing Council (KCAHC) – Regional Level Review
- Puget Sound Partnerships (PSP) Ecosystem Coordination Board (ECB)² – Local Review

Additional Local Level review from sources such as public comments and the Planning Commission Public Hearing is forthcoming and will need to be incorporated into the final draft as well.

¹ [RCW Chapter 36.70a](#)

² While PSP is a regional planning program, they do not have published plans to assess consistency with under [RCW 36.70A.100](#), their review is more akin to a Local Level Review.

LDC has reviewed and compiled the received comments and identified the below major items requiring action on the part of the City. Items are broadly described to collect similar review comments; specific codes or policies are referenced according to the following:

Code or Plan	Abbreviation
Revised Code of Washington	RCW
Multi-County Planning Policies	MPP
Countywide Planning Policies	CPP
Local Comp Plan Policies	LP

Ch.1 Land Use Element Comments

Commerce noted that the City has not adopted any code nor made any reference to the Washington Wildland Urban Interface Code. This is required by [RCW 36.70A.070\(1\)](#) and will need to be incorporated into the Final Comp Plan.

Other comments included subjects of:

- Proposed siting of higher density housing by encouraging infill development and increased density (MPP-RGS-6)
- Watershed planning
- Climate Change Resilience (MPP-C-7-10, CPP-CC-Action-4, and [RCW 19.27.560](#))

Ch.2 Natural Environment Element Comments

WDFW met with City staff and provided detailed comments on the Natural Environment Element. The most major comments were requests for an updated Critical Areas map and updates to critical areas regulations for consistency with Best Available Science. PSRC had minor policy revision comments relating to habitat preservation and Climate Change resilience.

Ch.3 Community Design Element Comments

WDFW had minor policy revision comments relating to habitat preservation and Climate Change resilience. The following subjects and policies were included in these comments:

- Planning for pedestrian connection of natural and open spaces (LP-CD-P3, LP-CD-P14)
- Implement community engagement within the City’s vegetation and tree preservation practices (LP-CD-P18, LD-CD-P20, LD-CD-P27)

Ch.4 Housing Element Comments

Multiple public agencies submitted review comments regarding the Housing Element of the Draft Comprehensive Plan. Issues identified in comments range from suggestions to issues of compliance with the Growth Management Act (GMA).

Some major items that will need to be addressed in the Final Comprehensive Plan include:

- Affordable Housing

PSRC recommended the incorporation of policy MPP-H-Action-4.

MPP-H-Action-4 is a local policy that requires jurisdictions to conduct a housing needs analysis and evaluate the effectiveness of local housing policies and strategies to achieve housing targets and affordability goals to support updates to local comprehensive plans.

A Land Capacity Analysis (LCA) had not been included with the Draft Comp Plan to identify capacity for affordable housing. LDC has performed a LCA and identified a capacity deficit for affordable housing. To demonstrate capacity for affordable housing,

the City must adopt development regulations that will support affordable housing development as outlined in Commerce guidance.

LDC has reviewed options for demonstration of affordable housing capacity, the City will either need to adopt higher density zoning or utilize creative solutions to plan for the City's housing targets.

- Moderate Density Housing

[RCW 36.70A.070\(2\)\(b\)](#) specifically requires the Housing Element to include policies related to Moderate Density Housing. Commerce, PSRC, and KCAHC all requested revisions to include these provisions in the Final Comprehensive Plan.

MPP-H-9 refers to a jurisdiction expanding their housing capacity for moderate density housing to bridge the gap between single-family and more intensive multi-family housing that would provide opportunities for more affordable ownership and rental housing that would allow more people to live in neighborhoods across the region.

- Racially Disparate Impacts (RDI)

[RCW.70A.070\(2\)\(e\)](#) and several MPPs and CPPs require the City to incorporate the consideration of Racially Disparate Impacts (RDI) in its Housing Element. The City has included language referencing RDI, but Commerce, PSRC, and KCAHC have requested the City include future analysis of RDI within the City's history and current regulations & policies.

There were additional minor comments received that will be reviewed by the Planning Commission.

Ch.5 Transportation & Circulation Element Comments

Multiple public agencies submitted review comments regarding the Transportation & Circulation Element of the Draft Comprehensive Plan.

Commerce and PSRC identified the City needs to adopt WSDOT Level-of-Service Standards for SR-520.

Additionally, PSRC indicated the City needed to provide a 10-year forecast of travel needs based on the adopted land use plan. This is a requirement under [RCW 36.70A.070\(6\)\(a\)\(iii\)\(E\)](#) that the City will need to take into consideration.

Other comments included subjects of:

- Habitat connectivity and safety (LP-T-G9, LP-T-P3, LP-T-P8)
- Climate Change resilience
- Mobility for Special Needs

Ch.6 Parks Element Comments

At this time, the City has not received any comments on the Parks Element in the Draft Comprehensive Plan.

Ch.7 Capital Facilities Element Comments

Few comments were made on the Capital Facilities Element of the Draft Comprehensive Plan. Commerce stated that the City needed to add an inventory of existing "Green Infrastructure" per [RCW 36.70A.030\(3\)\(a\)](#).

Additionally, WDFW had minor policy revision and general policy suggestion comments.

- Designing and protecting essential public facilities and services
- Provide inventory of existing green infrastructure

Ch.8 Utilities Element Comments

Few comments were made on the Utilities Element of the Draft Comprehensive Plan. WDFW had minor policy revision and general policy suggestion comments.

Conclusion

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. These revisions are necessary to address issues of compliance with State regulations and consistency with Regional and county-wide plans. Major issues identified in preliminary review of the received comments include:

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