

Exhibit 2



Puget Sound Regional Council

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July 18, 2024

Jonathan Kesler, Planning Manager
City of Medina
PO Box 144
Medina, WA 98039

Subject: PSRC Comments on City of Medina Draft Comprehensive Plan

Dear Mr. Kesler,

Thank you for providing an opportunity for the Puget Sound Regional Council (PSRC) to review the City of Medina draft comprehensive plan. We appreciate that the city has invested a substantial amount of time and effort in developing the draft plan and, given that Medina is a small city, the effort is particularly commendable. We appreciate the chance to review the plan while in draft form. This timely collaboration provides an opportunity to review plan elements for the 2024 comprehensive plan and prepares the city well for [certification](#) by PSRC once the full plan has been adopted.

We suggest the city consider the following comments as further work is completed for the comprehensive plan update to align with [VISION 2050](#) and the Growth Management Act. Importantly, we encourage the city to work towards a final plan that documents housing capacity consistent with the city's adopted growth targets and allocated housing need. We will look forward to continuing to work with you as you prepare the final comprehensive plan.

We reviewed the draft plan using the PSRC [VISION 2050 Consistency Tool](#). Key sections of the consistency tool are listed below on the left along with relevant comments on the draft plan on the right:

Housing

Plan Review Consistency Tool	PSRC Comment on Draft Medina Plan
<p>Expand the diversity of housing types for all income levels and demographic groups, including low, very low, extremely low, and moderate-income households (MPP-H-2-6, H-9)</p> <p>Demonstrate sufficient zoned development capacity to accommodate targets (RCW 36.70A.115)</p>	<p>The draft plan does not currently demonstrate how the city will meet its housing target or housing need allocations. Medina’s housing target of 19 units, including permanent supportive housing, is entirely allocated to units under 80% AMI, and the city needs to provide appropriate capacity to accommodate housing needs. The city should clearly document housing capacity to meet various income levels, including emergency housing. Commerce offers guidance on how jurisdictions can calculate housing capacity. Capacity should be available when the plan is adopted. Please note that, per guidance from Commerce, accessory dwelling units (ADUs) are generally expected to serve as moderate income housing needs (>80-120% AMI) in higher-cost communities.</p> <p>In addition, please review Policy LU-P1 to ensure it supports the intent to implement zoning changes required under state law and accommodate the city’s housing needs.</p>
<p>Address affordable housing needs by developing a housing needs assessment and evaluating the effectiveness of existing housing policies, and documenting strategies to achieve housing targets and affordability goals. This includes documenting programs and actions</p>	<p>The city must document barriers and actions needed to achieve housing affordability for all income brackets, including findings on existing barriers, documentation of housing tools to meaningful address gaps, and direction on meeting needs for all income levels. Commerce's adequate provisions</p>

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needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations (H-Action-4)	guidance is available to help document this work.
Expand housing capacity for moderate density housing, i.e., “missing middle” (MPP-H-9)	The city should include a more specific policy addressing moderate density housing consistent with regional policy and state law. Under HB 1110, cities must adopt compliant development regulations by June 30, 2025. Additional policies to support middle housing would be beneficial to the plan. Refer to Commerce guidance on Planning for Middle Housing .
Identify and begin to undo local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including zoning that may have a discriminatory effect and areas of disinvestment and infrastructure availability	Analysis and policies addressing racially disparate impacts, exclusion, and displacement should be included in the draft plan or accompanying housing analysis. Commerce’s Racially Disparate Impact Guidance provides additional information on how to approach analysis of exclusion and racially disparate impacts. PSRC’s Community Profiles also include data measures to assess racially disparate impacts in housing.

Land Use

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Encourage infill development and increased density in locations consistent with the Regional Growth Strategy (MPP-RGS-6)	The draft plan states that “consideration of denser housing along transit corridors” would support transportation objectives, but transit corridors are not identified. The city should discuss where this denser housing may be appropriate.

Transportation

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<p>Include a 20-year financing plan, as well as an analysis of funding capability for all transportation modes (RCW 36.70A.070(3), RCW 36.70A.070(6)(a)(iv), WAC 365-196-415, WAC 365-196-430, MPP-RC-11-12, T-6, T-15)</p>	<p>PSRC recognizes the limited scale and scope of transportation needs in a small city like Medina and the plan addresses many of these requirements through the 6-year Transportation Improvement Program. The city is encouraged to identify projects and programs necessary to meet demands through 2044. For more information, see Commerce’s Transportation Element Guidebook.</p>
<p>Provide travel demand forecasts and identify state and local system projects, programs, and management necessary to meet current and future demands and to improve safety and human health (RCW 36.70A.070, MPP-T-4-5)</p>	<p>The city should include travel forecasts for at least ten years based on the adopted land use plan. The Department of Commerce’s Transportation Guidebook discusses how smaller jurisdictions can address analysis requirements, including travel impacts on state-owned facilities. The future conditions section should be revised to include a more thorough traffic analysis using a methodology such as one suggested in Commerce’s Transportation Guidebook</p>
<p>Include state facilities and reflect related (regional/state) level-of-service standards (RCW 36.70A.070, RCW 36.70A.108)</p>	<p>Cities and counties are required to include the LOS standards for all state routes in the transportation element of their local comprehensive plans. The adopted LOS standard for SR 520 should be included in the draft plan. More information on LOS for state facilities is available on PSRC’s website.</p>

<p>Ensure mobility choices for people with special needs (MPP-T-10)</p> <p>People with mobility and accessibility needs/priority populations:</p> <ul style="list-style-type: none"> • Youth • Older adults • People with low incomes • People with disabilities 	<p>The draft plan notes Medina’s aging population. The city should include policy and analysis of transportation planning for people with mobility and accessibility needs, including older adults.</p>
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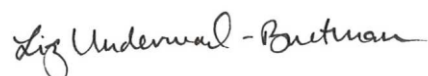
Climate Change

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<p>Identify and address the impacts of climate change and natural hazards on the region to increase resilience (MPP-CC-7-10, CC-Action-4)</p>	<p>The city should consider identifying specific hazards to the community related to climate change. The Puget Sound Hazard map provides information for individual jurisdictions. This identification may be required by HB 1181 in 2029.</p>

PSRC has resources available to assist the city in addressing these comments and inform development of the draft plan. We have provided links to online documents in this letter, and additional resources related to the plan review process can also be found at <https://www.psrc.org/planning-2050/vision/vision-2050-planning-resources>.

We appreciate all the work the city of Medina is doing and the opportunity to review and provide comments. We are happy to continue working with you as the draft progresses through the adoption process. If you have any questions or need additional information, please contact me at 206-464-6174 or LUnderwood-Bultmann@psrc.org.

Sincerely,



Liz Underwood-Bultmann, Growth Management
Puget Sound Regional Council

cc: Review Team, Growth Management Services, Department of Commerce