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May 20, 2024

Michael Hubner
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Sent via electronic mail to Michael.hubner@seattle.gov

RE: Draft Comment Letter for Submittal ID 2024-S-6934 – City of Seattle Draft Comprehensive Plan, Draft Environmental Impact Statement, and SEPA Infill Exemption

Dear Michael:

Thank you for the opportunity to comment on the City of Seattle's proposed draft 2024 comprehensive plan, draft EIS (DEIS), and notice of SEPA infill exemption received on March 11, 2024. Growth Management Services processed the draft documents with material identification number 2024-S-6934.

Your submission represents a great deal of work and substantial progress towards the 2024 periodic update of your comprehensive plan due December 31, 2024. We especially appreciate the extensive work conducted on the city's public outreach and engagement process and applaud you on what appears to be a robust public participation plan!

As part of our review, we referenced the draft One Seattle Plan Update (2024) and DEIS. We have focused our review on the following comprehensive plan elements, and offer respective comments and/or suggestions as follows:

1. Land Use

    a. Based on our review, it appears the draft land use element does not include population projections as required by the Growth Management Act (GMA). Per RCW 36.70A.070(1), "The land use element shall include population densities, building intensities, and estimates of future population growth". To better align with statute, we recommend including a population projection in your Land Use Element and, for consistency, throughout other elements in your comprehensive plan.

b. The city shall adopt a comprehensive plan and development regulations that are consistent with and implement the comprehensive plan, per RCW 36.70A.040. It appears that development standards with which to implement the comprehensive plan elements, policies and goals are not yet available, or are incomplete. Please provide a draft of all associated development regulations and zoning updates for the One Seattle Plan draft comprehensive plan so that it may be reviewed for consistency with the Growth Management Act (GMA), RCW 36.70A.106.

2. Housing

a. The Growth Strategy and draft land use element include policies on moderate density housing options (e.g. duplexes, triplexes, etc.), however, these policies do not appear in the draft housing element, per RCW 36.70A.070. Please consider including a policy on a variety of moderate density housing types in the Housing Element as well.

b. The draft comprehensive plan does not provide supporting documentation indicating sufficient land capacity for emergency housing and emergency shelter, per RCW 36.70A.070(2)(c). While Commerce guidance indicates jurisdictions do not need to complete a land capacity analysis (LCA) for emergency housing and emergency shelter if they allow these uses in all zones that allow hotels, RCW 36.70A.070(2)(c) states jurisdictions must ensure sufficient capacity for all housing types, including emergency housing and emergency shelter, are identified in the housing element. Therefore, we recommend the city consider including this information in the final LCA.

c. We appreciate the analysis you completed for the "Housing Production Barriers and Actions" section as well as the policies in your draft housing element addressing these barriers. However, the strategies identified in the "Actions to Address Barriers" section do not appear to clearly address barriers to housing across *all* income levels, particularly deeply affordable housing, emergency housing and permanent supportive housing, per RCW 36.70a.070(2)(d)(i) and (ii). We encourage you to expand your analysis of barriers to affordable housing and develop a detailed list of actions to remove these barriers. Completing this exercise can help guide your work over the coming years, including your required five-year implementation progress report (RCW 36.70A.130(9)). For more information, please refer to "Chapter 4. Adequate provisions" and checklists in Appendix B in Book 2.

d. We applaud the "Historical Context of Racist Housing and Land Use Practices" and "Geographic Analysis of Racial and Social Equity in Housing" sections provided in your draft documents. The Housing Appendix could be improved by including a review of housing element policies that have led to racially disparate impacts. For more information, see "Step 3. Evaluate Policies" in the Racially Disparate Impacts Guidance (Book 3).

3. Transportation

   a. A transition plan for transportation, as required in Title II of the Americans with Disabilities Act (ADA), is required in the city's transportation element. Local governments are required to perform self-evaluations of current facilities and develop a program access plan to address deficiencies and achieve the identification of physical obstacles, establish methods, perform modifications and identify leadership roles. RCW 36.70A.070(6)(a)(iii)(G), new in 2023. Please add this item to the One Seattle Comprehensive Plan.

   b. A transition plan as required by HB 1181 is not required until the 5 year check-in. However, it appears that that the city intends to comply with the climate requirements (multimodal levels of service standards and vehicle miles traveled reduction strategies), therefore we recommend the city include a transition plan sooner, rather than later, to guide your work over the coming years, including your five-year implementation progress report (RCW 36.70A.130(9)(a).

   c. It appears that a description of existing and planned transportation demand management (TDM) strategies, such as HOV lanes or subsidy programs, and parking policies, is not included in the transportation element, per RCW 36.70A.070(6)(a)(vi) and WAC 365-196-430(2)(i). Please ensure a detailed description of each of the demand management strategies is included in the final One Seattle Plan Update (2024).

   d. If probable funding falls short of meeting identified needs of the transportation system, including state transportation facilities, a discussion of how additional funds will be raised, or how land use assumptions will be reassessed to ensure that LOS standards will be met is required. **(**RCW 36.70A.070(6)(a)(iv)(C) and WAC 365-196-430(2)(l)(iii)). There is mention of this in the funding investments section and land use assumption discussion in the appendix. However, we recommend you add a more detailed discussion on how additional funds will be raised and how land use assumptions will be reassessed.

   e. There appears to be minimal language in the plan concerning compatible airport siting. General aviation airports are essential public facilities. We recommend expanded discussion on appropriate compatibility, high intensity uses, airspace and height hazard obstruction, noise and safety issues, and other issues unique to each airport, such as topography and geography, per RCW 36.70.547.

4. Capital Facilities

   a. An Inventory of existing capital facilities indicating their respective locations and capacities does not appear to be included in the draft "One Seattle Plan – Comprehensive Plan Update" as required by RCW 36.70A.070(3)(a). While there is an "Appendices" section listing the names and contents of said appendices, the appendices are not included for review. Please provide the "Capital Facilities Appendix" so it may be reviewed for consistency with the Growth Management Act (GMA). See WAC 365-196-

415(2)(a) for additional guidance pertaining to GMA requirements for the capital facilities inventory.

b. A forecast of future needs for capital facilities during the planning period do not appear to be included in the draft "One Seattle Plan – Comprehensive Plan Update" as required by RCW 36.70A.070(3)(b). Please provide the "Capital Facilities Appendix" so it may be reviewed for consistency with the Growth Management Act (GMA). See WAC 365-196-415(2)(b) for additional guidance pertaining to GMA requirements for the capital facilities forecast of future needs.

c. Proposed locations of expanded or new capital facilities appear to be addressed in the adopted 6-year Capital Improvement Plan (CIP), however, the capacities of said expanded or new capital facilities are not provided as required by RCW 36.70A.030(3)(c) and WAC 365-196-415(1)(c) and (3)(c). We recommend an amendment to the CIP to include capacities of expanded or new capital facilities. We also want to note that infrastructure investments should consider equity and plan for any potential displacement impacts.

d. The draft capital facilities element does not appear to include a policy or procedure to reassess the land use element if probable funding falls short of meeting existing needs as required by RCW 36.70A.070(3)(e). We recommend adding a policy or procedure to reassess directly in the capital facilities element as required by statute. See WAC 365-196-415(2)(d) for additional guidance.

5. Utilities Element

a. An inventory of existing utilities consisting of the general location, proposed location, and capacity of all existing and proposed utilities does not appear to be included in the draft "One Seattle Plan – Comprehensive Plan Update" as required by RCW 36.70A.070(4)(a). While there is an "Appendices" section listing the names and contents of said appendices, the appendices are not included for review. Please provide the "Utilities Appendix" so it may be reviewed for consistency with the Growth Management Act (GMA). See WAC 365-196-420(2)(a) for additional guidance pertaining to GMA requirements for the utilities element inventory.

Thank you again for the opportunity to comment. If you have any questions or concerns about this letter, or any other growth management issues, please feel free to contact me at (360)280-3147 or catherine.mccoy@commerce.wa.gov. We extend our continued support to the City of Seattle in achieving the goals of the GMA.

Sincerely,

Catherine McCoy

Senior Planner
Growth Management Services

Catherine McCoy:lw

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