Puget Sound Regional Council

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May 6, 2024

Michael Hubner, Long Range Planning Manager
Seattle Office of Planning and Community Development
P.O. Box 94788
Seattle, WA 98124-7088

Subject: PSRC Comments on Draft One Seattle Comprehensive Plan Update

Dear Mr. Hubner,

Thank you for providing an opportunity for the Puget Sound Regional Council (PSRC) to review the draft 2024 Seattle comprehensive plan. We recognize that the city has invested a substantial amount of time and effort in developing the draft plan and appreciate the chance to review while in draft form. Timely collaboration provides an opportunity to review draft plan elements for the 2024 comprehensive plan and prepares the city well for certification by PSRC once the full plan has been adopted.

We encourage the city to consider the following comments as further work is completed for the comprehensive plan update to align with VISION 2050 and the Growth Management Act. We reviewed the draft plan using the PSRC Plan Review Consistency Tool. Comments on portions of the consistency tool are noted below:

Plan Review Consistency Tool	PSRC Comment on Draft Seattle Plan
Transportation	
The Growth Management Act requires a variety of technical analysis to support the transportation element, including inventories of existing facilities (roadways, freight routes, sidewalks, transit routes, airports, ferry routes, and bicycle facilities), level of service standards, forecasts, and project lists. (RCW 36.70A.070(6)).	The draft plan does not yet include a transportation appendix that documents technical analysis to support the transportation element. These transportation requirements are essential for plan certification. We look forward to reviewing a draft of the appendix, which should include requirements such as: ○ Inventories of existing facilities ○ Active transportation component ○ Level of service standards ○ Travel forecasting and land use assumptions ○ System needs ○ Multiyear financing plan

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	The plan should also include mode split goals for regional growth centers and manufacturing/industrial centers per DP-Action-9. PSRC's Transportation Element Guidance includes additional information on transportation requirements, including minimum guidelines for multimodal level of service standards.
Growth Strategy / Development Patterns	
Support the development of compact urban communities and central places with densities that support the Regional Growth Strategy, transit, and walking (MPP-RGS-6, DP-1, DP-3)	The draft plan does not yet include a Future Land Use Map. We look forward to seeing additional details of proposed zoning changes associated with this plan.
Support the update of regional center subarea plans to be consistent with the revised Center Plan Tools (DP-Action-8)	PSRC's Regional Centers Framework outlines the requirements for maintaining center designation. As we have discussed with city staff, PSRC will be reviewing regional centers in 2025 for consistency with planning expectations and other center criteria. PSRC has developed VISION 2050 Consistency Tools for Regional Growth Center and Manufacturing/Industrial Center plans to help jurisdictions connect regional policies to local planning efforts and achieve plan certification. PSRC staff are available to review draft center plans and respond to questions on regional center requirements.
PSRC will provide upcoming opportunities to designate new regional growth and manufacturing/industrial centers	The plan proposes a new regional growth center in the Ballard neighborhood. The plan map shows Ballard as a regional center and language in the Growth Strategy element lists Ballard as a regional center. The plan should clarify that Ballard is a proposed regional center and has not yet been designated by PSRC. PSRC's Designation Procedures for New Centers outlines requirements to designate new centers, which include adopting a subarea plan

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	consistent with PSRC requirements. PSRC staff are available to provide support for the designation of new regional centers.
Airport-adjacent communities: Identify and address any airports within or adjacent to the jurisdiction (RCW 36.70.547, 36.70A.070(6)(a)(iii)(A), MPP-DP-48) **Airport-adjacent communities**: Describe existing and planned uses near the airport, as well as policies and regulations that discourage incompatible uses (RCW 36.70.547, 36.70A.070(6)(a)(iii)(A), MPP-DP-48) **Airport-adjacent communities**: Promote coordinated planning and effective management to optimize the region's aviation system in a manner that minimizes health, air quality, and noise impacts to communities, including historically marginalized communities (MPP-T-28)	The plan should include additional information about land uses adjacent to the city's airports and policies and regulations to discourage incompatible uses. PSRC's Airport Compatible Land Use Report provides information about planning adjacent to airports. The draft plan includes a new "Neighborhood Center" in the Georgetown neighborhood, which is immediately adjacent to the King County Airport and surrounded by a designated manufacturing/industrial center. MPP-DP-48 and 50 discourage the siting of incompatible uses adjacent to airports and manufacturing/industrial centers. The plan should include more information about proposed uses and heights for this area and how the city will manage incompatible uses.
Housing	
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 needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations (H-Action-4)	The plan should provide a more complete documentation of potential regulatory barriers to affordable housing. Commerce's adequate provisions checklist can help document this work.

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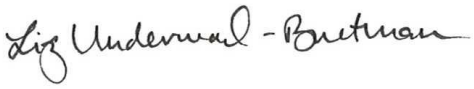
Environment / Climate Change	
Ensure all federal and state air quality standards are met and reduce emissions of air toxics and greenhouse gases (WAC 173-420-080, MPP-En-22)	The plan should include a policy and implementation actions that address federal and state clean air legislation and ensure that air quality at least meets established standards.
Address rising sea water by siting and planning for relocation of hazardous industries and essential public services away from the 500-year floodplain (MPP-CC-10)	The city should address rising sea water by siting and planning for relocation of hazardous industries and essential public services away from the floodplain.

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 on our Planning Resources and Plan Review pages.

We appreciate all the work the city 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