

Tukwila Comprehensive Plan

Agency and Other Comments/Requests/Responses (November/December 2024)

#	Comment	Response
	<p>WA Department of Commerce (11/19/24 letter)</p>	
	<p>Catherine McCoy Senior Planner Growth Management Services Washington Department of Commerce</p>	
1	<p>1) Land Use Element</p> <p><i>a) The Land Use Element shall provide a consistent population projection throughout the plan which should be consistent with the jurisdiction's allocation of countywide population and housing needs. RCW 36.70A.115, RCW 43.62.035 and WAC 365-196-405(f)</i></p> <p>The land use assumptions in the land use element form the basis for all growth-related planning functions in the comprehensive plan, including transportation, housing, and capital facilities. In our review of the city's draft comprehensive plan we did not find consistent language in the land use element or throughout the draft plan related to population projections as required by the Growth Management Act (GMA). To better align with statute we recommend a distinct ('front and center') set of population projections in your land use element, and for consistency, throughout other elements in your plan particularly in the housing element, the transportation element, and in the capital facilities element.</p> <p>Commerce's recently updated HAPT includes a way to calculate consistent population projections associated with housing targets that the city may use if desired. Based on your adopted target and the HAPT calculation, the 2044 population projection for Tukwila (based on a future housing need of 6,500 units) is 34,666. Contact Laura Hodgson for more information or the actual file with this data. Or contact Rebecca Maskin at King County for population projection support.</p>	<p>Housing Element and Land Use Element have been updated to include population projection in the introductory text.</p> <p>36,000 estimation is based on per household totals used with previous OFM reports, with some smoothing to the nearest thousandth.</p>

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2	<p><i>b) Estimates of population densities and building intensities based on future land uses and housing needs. RCW 36.70A.070(1) (amended in 2023), WAC 365-196-405(2)(i). For cities required to plan under the Buildable Lands Program, RCW 36.70A.215, amended in 2017, some jurisdictions may need to identify reasonable measures to reconcile inconsistencies. See Commerce’s Buildable Lands Program page.</i></p> <p>In our review, we did not find identification or assessment of population densities and building intensities based on future land uses and housing needs. We recommend including the assumed densities used to calculate capacity in each zoning category in your land capacity analysis documentation or discussing these in the Land Use Element, per RCW 36.70A.070(1). Estimates should include assumed densities to accommodate housing needs. (See WAC 365-196-210(6), and Housing Element Book 2: Step C and footnote 30 on page 26.)</p>	<p>Assumed densities used are consistent with the urban growth capacity report/buildable lands process. Housing and employment capacity exceeds requirements for each of these metrics.</p>
3	<p><i>c) Counties and cities must review drainage, flooding, and stormwater runoff in the area or nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state, including Puget Sound or waters entering Puget Sound. Water quality information may be integrated from the following sources:</i></p> <p>In our review of the land use element we noticed that mitigation measures were included in the environment element, the shoreline element, and the utilities element, however we did not find policy direction or specific discussion provided to address impacts and corrective actions in the land use element as required per RCW 36.70A.070(1) and WAC 365-196-405(2)(e). Please include a review of city drainage, flooding and flood prone areas and stormwater run-off; provide guidance in the land use element and, if applicable, reference the additional information found in other elements of the plan.</p> <p>Water quality information may be integrated from the following sources:</p>	<p>Environmental policies reside in the Natural Environment element (and Background Report), although new Land Use policy 2.4 directs the reader to that element for more detailed description and policy language. The Plan proposes adoption by reference the City’s functional plans (e.g., Stormwater, etc.) for more discussion of Stormwater issues</p>

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	<ul style="list-style-type: none"> • Planning and regulatory requirements of municipal stormwater general permits issued by the Department of Ecology that apply to the county or city. • Local waters listed under Washington state's water quality assessment and any water quality concerns associated with those waters. • Interjurisdictional plans, such as total maximum daily loads. 	
4	<p><i>d) The Land Use Element must provide identification of lands useful for public purposes such as utility corridors, transportation corridors, landfills, sewage treatment facilities, storm water management facilities, recreation, schools and other public uses. RCW 36.70A.150 and WAC 365-196-340</i></p> <p>In our review of the land use element we did not find language and/or mapping identifying lands useful for public purposes as described above. We found reference only to the Parks, Recreation, and Open Space element – lands useful for trails, open space networks and additional parks and civic spaces. We recommend adding policy language and/or maps consistent with RCW 36.70A.150 and RCW 36.70A.160 to the land use element or adding a reference within the land use element to the element where this required provision is located in your comprehensive plan.</p>	<p>At this time, the City of Tukwila has not identified any lands needed for City purposes. The City provides its commitment to work with the County and other jurisdictions in any future siting of essential public facilities in LU-Goal 6, and policies LU-6.1 and LU-6.2.</p>
5	<p><i>e) The Land Use Element must contain policies to designate and protect critical areas including wetlands, fish and wildlife habitat protection areas, frequently flooded areas, critical aquifer recharge areas and geologically hazardous areas. In developing these policies, the city must have included the best available science (BAS) to protect the functions and values of critical areas and give “special consideration” to conservation or protection measures necessary to preserve or enhance anadromous fisheries. RCW 36.70A.030(6), RCW 36.70A.172, WAC 365-190-080. Best Available Science: see WAC 365-195-900 through -925</i></p> <p>In our review of the draft land use element we did not find review assessment, or policy direction that would reflect the city’s long-term approach to local and regional critical areas</p>	<p>These priorities are described in the Natural Environment Element, page 2, and policies EN1.1, Goal EN-5, and EN5.1 (and policies 5.2- to 5.3), and policy EN-4.3.</p>

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	<p>protection. We recommend adding policy considerations pertaining to the protection and preservation of the city’s critical areas to the land use element <i>and</i>, if applicable, reference other plan elements in your comprehensive plan where these required policies are located. Please see the Critical Areas Handbook for additional guidance.</p>	
6	<p><i>f) New section RCW 36.70A.142 (2022), HB 1799: Development regulations newly developed, updated, or amended after January 1, 2025, must allow for the siting of organic materials (OM) management facilities as identified in local solid waste management plans (SWMP) to meet OM reduction and diversion goals. Siting must meet criteria described in RCW 70A.205.040(3).</i></p> <p>Our review did not find policies within the draft land use element or comprehensive plan specific to the siting of organic materials management. We recommend including policy language to allow for future siting of organic waste materials facilities in coordination with your solid waste management providers/plans and King County, as required by the GMA.</p>	<p>New policy is provided in the Utilities Element :</p> <p>Policy U-1.5 Allow for the future siting of organic waste materials facilities in coordination with the City’s Solid Waste provider and King County, consistent with RCW 70A205.040(3). Such facilities shall be considered “essential public facilities” and the City shall engage with area jurisdictions and agencies in the siting decision.</p>
7	<p><i>g) The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools and through wildfire preparedness and fire adaptation measures. RCW 36.70A.070(1) amended in 2023.</i></p> <p>Our review did not find language pertaining to wildfire risk and mitigation in the land use element. 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). You may wish to reference the Wildland Urban Interface Code (RCW 19.27.560), developed and adopted by the Washington State Building Code Council, as an example of development regulations intended to separate human development from wildfire-prone landscapes to protect existing residential development and infrastructure through community wildfire preparedness and fire adaptation measures.</p>	<p>Added corresponding policy to Land Use element</p> <p>LU 8.8: Consider potential wildfire risk prevention measures in updates to development standards.</p> <p>Note: Tukwila is not considered a High Risk Community for Wildfire Hazards in King County.</p>

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8	<p><i>h) The city shall adopt a comprehensive plan and development regulations that are consistent with and implement the comprehensive plan, per RCW 36.70A.040(3).</i></p> <p>Based on our review, the 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 Tukwila Comprehensive Plan 2024 draft comprehensive plan so that it may be reviewed for consistency with the Growth Management Act (GMA). <i>RCW 36.70A.106</i></p>	<p>No development regulation updates are proposed with this periodic update.</p> <p>Legislative updates will be adopted within 6 months of the periodic update of the comprehensive plan will be incorporated to be consistent with state law. Updates related to SB 5290, required by the end of 2024, have already been adopted.</p>
9	<p>2) Housing Element</p> <p><i>a) The Housing Element must include an inventory and analysis of existing and projected housing needs over the planning period, by income band, consistent with the jurisdiction's share of countywide housing need, as provided by Commerce. RCW 36.70A.070(2)(a) amended in 2021, WAC 365-196-410(2)(b) and (c)</i></p> <p>In our review, we did not find a projection of emergency housing and shelter needs included with the housing projections in the draft Housing Element or Housing Element Background Report. We recommend including the city's allocated emergency housing needs in the Housing Element, as required by RCW 36.70A.070(2)(a). Additionally, we recommend providing a table or other documentation of local allocation of housing needs by income bracket. For additional guidance, see Housing Element Book 1, see #6 of "minimum standards for identifying and allocation projected housing needs" on page 60.</p>	<p>Emergency Housing needs are addressed both in the Housing Element (policies 2.4 and 2.5) and in the Housing Background Report (pages 32 and 42-43).</p> <p>The target number cited (1,242) is consistent with the adopted Countywide Planning Policies.</p>
10	<p><i>b) The Housing Element must include identification of capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters and permanent supportive housing. RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-410(e) and (f)</i></p>	<p>It is recognized that emergency housing capacity is not compliant with Tukwila's adopted targets and changes to development regulations related to emergency housing allowances per site and buffering between sites need to be updated in the future</p> <p>It will be necessary for the Council to adopt emergency housing regulations consistent with requirements following the update of the Comprehensive Plan update.</p>

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	<p>The city identified that current zoning does not allow sufficient capacity to accommodate emergency housing needs. Updates to development regulations that create sufficient capacity for emergency housing should help the city achieve this requirement. We strongly recommend documenting any planned updates to create sufficient capacity for the allocated emergency housing target of 1,242 beds. Guidance on updating development regulations for emergency housing and shelter can be found in the STEP Model Ordinance and User Guide. See Chapter 6 for model ordinance language and Chapter 7 for demonstrating sufficient land capacity for emergency housing targets.</p> <p>Additionally, we recommend providing an updated statement or discussion indicating there is sufficient capacity of land for all income housing needs, including emergency housing. Include a table showing the breakdown of capacity in zones that add up to housing needs for all income levels, including emergency housing. Supporting documentation of land capacity analysis is encouraged. Housing Element Book 2, see bottom table of Exhibit 17 on page 40 and Exhibit 20 on page 48.</p> <p>All limitations on supportive housing types such as emergency housing (EH), emergency shelters (ES), permanent supportive housing (PSH), and transitional housing (TH) must allow the siting of a sufficient number of units and beds necessary to meet project needs. Housing Element Book 2, see pages 41-48. Additionally, the zoning map must be consistent with and implement the land use map and land capacity findings. <i>RCW 36.70A.115(1), WAC 365-196-800.</i></p>	<p>Figures 36 and 40 in the Housing Background Report detail capacity by AMI level, detailed out by segment.</p>
11	<p><i>c) The Housing Element must include adequate provisions for existing and projected housing needs for all economic segments of the community, including documenting barriers and actions needed to achieve housing availability. RCW 36.70A.070(2)(d) amended in 2021, WAC 365-196-010(g)(ii), WAC 365-196-300(f), WAC 365-196-410 and see Commerce’s Housing Action Plan (HAP) guidance: Guidance for Developing a Housing Action Plan.</i></p>	<p>Appendix B adequate provisions checklist has been completed and is available as a link within the housing element</p>

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	<p>We recommend including key findings from the Gap Analysis in the Housing Element and refer to Housing Background Report for more details. Include a list of barriers to affordable housing needs, including barriers to emergency housing and permanent supportive housing, Housing Element Book 2, see page 50 and Appendix B.</p> <p>Include a list of actions needed to remove barriers to affordable housing, Housing Element Book 2, see page 61 and Appendix B. Note: identification of barriers to affordable housing and actions to remove barriers do not need to be in table format, but both items need to be present in the housing element.</p>	
12	<p><i>d) Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> <i>Zoning that may have a discriminatory effect;</i> <input type="checkbox"/> <i>Disinvestment; and</i> <input type="checkbox"/> <i>Infrastructure availability</i> <p><i>RCW 36.70A.070(e) new in 2021</i></p> <p>While the materials in the city’s Housing Background Report fulfill this requirement, we recommend including key findings from the Racially Disparate Impacts Analysis in the Housing Element and referencing the Housing Background Report for more details. This could be in a statement of whether data shows if there are disparate impacts. Note: Commerce recommends using a variety of data available for all jurisdictions as provided on our Ezview site and in Housing Element Book 3, pages 33-36.</p>	<p>Page 34-35 of the housing background report has extensive discussion of racially disparate impacts relating to zoning, divestment and infrastructure availability.</p>
13	<p>3)Transportation Element</p> <p><i>a) The Transportation Element must include a forecast of multimodal transportation for a minimum of 10 years including land use assumptions used in estimating travel. RCW 36.70A.070(6)(a)(i) and (a)(iii)(E) amended in 2023, WAC 365-196-430(2)(f)</i></p>	<p>Forecasts and project identification/prioritization sections have been added/completed in the background report. All forecasting includes all modes of transportation and land use and job assumptions are consistent throughout all Elements.</p>

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	<p>In our review we did not see that the city’s forecast includes multimodal transportation for a minimum of 10 years. The forecasting needs to include automobiles, as well as pedestrian, bicycle and transit systems. Also, please ensure that the city’s land use assumptions are accurate and consistent throughout the comprehensive plan.</p>	
14	<p><i>b) A multi-year financing plan based on needs must be identified in the transportation element of the comprehensive plan, the appropriate parts of which serve as the basis for the 6-year street, road or transit program. RCW 36.70A.070(6)(a)(iv)(B) and RCW 35.77.010, WAC 365-196-430(2)(k)(ii)</i></p> <p>In our review we did not find a detailed multi-year financing plan based on needs identified in the comprehensive plan. Please provide this prior to adoption of the comprehensive plan. If this is located in a separate document then please provide a reference in the transportation element.</p>	<p>Financing section has been added to the Background Report, including a multi-year financing plan.</p>
15	<p><i>c) A transition plan for transportation as required in Title II of ADA. 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).</i></p> <p>Transportation element updates associated with HB 1181 are not required until the 5 year implementation progress report for 2024 jurisdictions (<i>RCW 36.70A.130(9) and (10)</i>). However, it is advisable that jurisdictions begin this planning process as early as possible. ADA transition plans are an important component of a multimodal transportation system.</p>	<p>A draft ADA Transition Plan was developed in ~2016. Implementation Strategies include an update to the ADA Transition Plan.</p> <p>A complete ADA Transition Plan is required to be in place within 5 years.</p>
16	<p>Zoning Code</p> <p><i>a) Zoning designations must be consistent and implement land use designations that accommodate future housing needs by income bracket as allocated through the countywide planning process. (RCW 36.70A.070(2)(c) - Amended in 2021 with HB 1220).</i></p> <p>Pending updates to STEP regulations.</p>	<p>It is recognized that emergency housing capacity is not compliant with Tukwila’s adopted targets and changes to development regulations related to emergency housing allowances per site and buffering between sites need to be updated in the future.</p> <p>Emergency housing regulations will be updated following the adoption of the Comprehensive Plan Periodic Update.</p>

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17	<p><i>b) Permanent supportive housing or transitional housing must be allowed where residences and hotels are allowed. RCW 35A.21.430 amended in 2021, RCW 35.21.683, amended in 2021, (HB 1220 sections 3-5). “Permanent supportive housing” and “transitional housing” is defined in RCW 36.70A.030; “transitional housing” is defined in RCW 84.36.043(3)(c).</i></p> <p>Permanent supportive and transitional housing are allowed in the appropriate zones. However, spacing and occupancy restrictions are inconsistent with RCW 35A.21.430, as they are not based on a demonstrated need to address public health and safety. Please see the STEP Model Ordinance and User Guide for additional guidance.</p> <p>Any limitations on permanent supportive housing and transitional housing must be connected to public health and safety and allow the siting of a sufficient number of units and beds necessary to meet projected needs. Housing Element Book 2, see pages 41-48.</p>	<p>It is recognized that PSH and transitional housing regulations are not compliant due to various limitations that do not provide justification of why they are required.</p> <p>The PSH and transitional housing regulations will be updated following the adoption of the Plan’s periodic update.</p>
18	<p><i>c) Indoor emergency shelters and indoor emergency housing must be allowed in any zones in which hotels are allowed, except in cities that have adopted an ordinance authorizing indoor emergency shelters and indoor emergency housing in a majority of zones within one-mile of transit. Indoor emergency housing must be allowed in areas with hotels. RCW 35A.21.430 amended in 2021, RCW 35.21.683, amended in 2021, (HB 1220 sections 3-5)</i></p> <p>Emergency housing and shelter are allowed in the appropriate zones, but, as identified in the LCA, current spacing, occupancy, and intensity restrictions prevent siting of sufficient number of units to meet allocated needs. Any spacing restrictions should be connected to public health and safety. Please update these regulations, to be consistent with RCW 35A.21.430. Please see the STEP Model Ordinance and User Guide for additional guidance (links provided above).</p>	<p>It is recognized that emergency housing capacity is not compliant with Tukwila’s adopted targets and changes to development regulations related to emergency housing allowances per site and buffering between sites need to be updated in the future.</p> <p>The emergency housing regulations will be updated following the adoption of the periodic Plan’s adoption.</p>
19	<p>As a friendly reminder, please submit all comprehensive plan updates and development regulation updates to Commerce for</p>	<p>So noted.</p>

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	60-day review prior to adoption, and submit all adopted plans within ten days after final adoption (RCW 36.70A.106(2))	
	Puget Sound Regional Council (8/28/24 letter)	
	Maggie Moore Growth Management Puget Sound Regional Council	
1	<p>Housing</p> <p><u>Plan Review Consistency Tool</u> Increase housing supply and densities to meet the region’s current and projected needs at all income levels consistent with the Regional Growth Strategy (MPP-H-1)</p> <p><u>PSRC Comment on Draft Tukwila Plan</u> The Tukwila Housing Background Report indicates the city currently lacks sufficient capacity for its allocation of housing affordable to all income levels. The report indicates the periodic update will remedy this gap – following through to provide sufficient capacity will be important in finalizing the plan update. 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.</p> <p>The city should show capacity for housing affordable to all income levels, including</p>	Capacity totals for all non-emergency housing have been updated using Department of Commerce recommended methodology to demonstrate adequate capacity.

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	<p>emergency housing capacity. Commerce’s STEP guidance provides further information.</p>	
2	<p><u>Plan Review Consistency Tool</u> Identify potential physical, economic, and cultural displacement of low-income households and marginalized populations and work with communities to develop anti-displacement strategies in when planning for growth (MPP-H-12, H-Action-6)</p> <p><u>PSRC Comment on Draft Tukwila Plan</u> The city is commended for including an analysis on racially disparate impacts.</p> <p>The city should work to identify more specific policies to address residential displacement.</p>	<p>Housing Element policies addressing residential displacement include:</p> <ul style="list-style-type: none"> • H2.7: Work with the owners and managers of Tukwila’s new and existing permanent or long-term low-income housing to maximize housing desirability, protect long-term affordability, and strengthen community connections. • H2.8: Strive to make alternative and affordable housing options available for residents currently living in substandard housing, such as pre-HUD code mobile homes. • H3.3: Play an active role in regional efforts to meet the needs of low-income community members, including monitoring of housing needs and updating city policies and regulations to align with regional goals. • H3.4: Continue to work closely with South King Housing and Homelessness Partnership (SKHHP) and other partners to achieve development of subsidized affordable housing for very low-, low- and moderate-income households. • H4.2: Develop and implement strategies to reduce displacement of low-income households in areas of redevelopment. • H4.3: Evaluate City actions for potential to increase displacement risk for naturally occurring affordable housing and vulnerable communities and mitigate or avoid taking actions that significantly increase this risk. • H4.4: Support the long-term preservation of existing naturally occurring affordable housing developments by acting as a facilitator between affordable housing groups interested in purchasing units and property owners. • H4.6: Continue to support the maintenance, weatherization, rehabilitation, and long-term preservation or replacement of existing housing for low- and moderate-income residents. • H4.9: Adopt renter protections to ensure stable housing for Tukwila Renters. <p>Implementation strategies associated with the housing element listed below more directly address mitigating residential displacement:</p>

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		<ul style="list-style-type: none">• Collaborate between City Staff, SKHHP and other community groups to disseminate affordable housing opportunities with new income restricted housing development.• Explore opportunities to support the development of additional income-restricted housing, or transition of naturally occurring affordable housing (NOAH) into income-restricted housing, including but not limited to density bonuses for affordable housing, expansion of 12-year MFTE availability, fee reductions and other standard flexibility for preservation of existing NOAH units and infill redevelopment.• Review mapping of areas with greatest risk of displacement and staff knowledge when considering zoning or other City actions with significant potential to impact displacement and consider attempting to offset the action through mitigating measures, phasing actions with other affordable housing development or reconsidering actions altogether.• Coordinate between City Staff and SKHHP to connect agencies purchasing and managing affordable housing with interested Tukwila property owners.• Continue to engage historically underserved populations with greater risk of displacement through both informal means of outreach, as well as representation on citizen boards and commissions.• Continue to seek partnerships with organizations developing affordable homeownership project, while amending residential development standards to expand viability of ownership housing types at lower price points through code amendments and partnering with organizations such as the Black Home Initiative to direct homeownership covenant funds and other resources toward ownership opportunities in Tukwila.• Coordinate City programming and promotion related to rental assistance, job training and advocacy with transit organizations in an effort to provide housing access, while supporting construction of new housing affordable to lower income levels.

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3	<p>Development Patterns, Environment & Climate Change</p> <p><u>Plan Review Consistency Tool</u> 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)</p> <p><u>PSRC Comment on Draft Tukwila Plan</u> Because of flood risk, the plan should include a map of the area identifying forecasted sea level rise. The Puget Sound Hazards map provides information for individual jurisdictions.</p>	<p>Addressed in the Climate Change section of the Natural Environment element (p. EN-7).</p> <p>In the siting of Essential Public Facilities, climate change issues (e.g., sea level rise) will be considered, Per Policy LU 6.2</p>
4	<p><u>Plan Review Consistency Tool</u> Preserve historic, visual, and cultural resources and consider potential impacts to culturally significant sites and tribal treaty fishing, hunting, and gathering grounds (MPP-DP-5-7)</p> <p><u>PSRC Comment on Draft Tukwila Plan</u> The city should describe and include policies on tribal treaty rights. PSRC’s Coordination with Tribes resource provides more information on this topic</p>	<p>Two policies were added:</p> <p>Policy LU 8.7 Consider the potential impacts of development to culturally significant sites and tribal treaty fishing, hunting, and gathering grounds.</p> <p>Policy CC-4.6 Coordinate with tribes in regional and local planning, recognizing the mutual benefits and potential for impacts between growth occurring within and outside tribal boundaries.</p> <p>In addition, text relating to SHB1717 was added to the Introduction (p. 8-9) to address the City’s outreach to Tukwila’s two tribal nations.</p> <p>Already in text:</p> <p>CC-1.4.2 Consult the Duwamish Tribe on any signage reflecting the City's past and including the Lushootseed language. The Lushootseed language expresses placenames that not only name the area but describe it.</p> <p>CC-1.6.2 When considering adding public art to the City, among others, invite the Duwamish Tribe to participate in and design art for the City.</p>

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		<p>EN-1.3 Collaborate with federal, state, and tribal fish and wildlife agencies to identify priority habitats and species, to establish appropriate protections to ensure no net loss of ecological functions and values.</p>
<p>5</p>	<p><u>Plan Review Consistency Tool</u> Identify open space, trail, and park resources and needs, and develop programs for protecting and enhancing these areas (MPP-En-11-12, En-15, En-Action-4)</p> <p><u>PSRC Comment on Draft Tukwila Plan</u> The city is commended for including a policy and parks level-of-service to provide parks within ¼ and ½ of all residents. PSRC uses the Trust for Public Land’s ParkServe mapping tool to identify park gaps. ParkServe shows that today, 82% of Tukwila’s residents live within a 10-minute walk of a park</p>	<p>Noted</p>
<p>6</p>	<p>Regional Centers PSRC will do an in-depth review of regional centers in 2025 following comprehensive plan updates. Existing regional growth centers are expected to meet the standards identified in the Regional Centers Framework to ensure redesignation. All work needs to be submitted to PSRC by May 30, 2025, to be considered in the redesignation process. Since Tukwila does not currently have a certified plan for the regional growth center, certification will be needed based on consistency with regional criteria shown in the Centers Plans Checklist.</p>	<p>Noted.</p> <p>Staff will be taking steps shortly after the adoption of the periodic update to ensure regulations support density and growth required in regional centers, such as removing residential uses with densities that would not support the required activity units per acre.</p>

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	<p><u>Plan Review Consistency Tool</u> <i>Jurisdictions with regional centers:</i> Support the update of regional center subarea plans to be consistent with the revised Center Plan Tools (DP-Action-8) PSRC Regional Centers Framework (2018) PSRC Centers Profiles Data</p> <p><u>PSRC Comment on Draft Tukwila Plan</u> As the city updates the land use element, growth targets for population and employment should be included for the regional growth center and manufacturing/industrial center. For urban growth centers, targets should be for at least 45 activity units/acre and represent a portion of the city's 2044 population and employment targets. For industrial employment centers, there should be a minimum of 20,000 planned jobs, representing a portion of the city's 2044 employment target.</p> <p>Additionally, industrial employment centers should have at least 10,000 existing jobs, and North Tukwila has less than 9,000 (2023).</p> <p>Manufacturing/industrial centers that have existing employment levels below the level required for new regional centers must complete a market study by May 2025 to evaluate the potential for and opportunities to best support center growth. The market study should show how</p>	

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	the center can meet targeted levels of growth within the planning period. The jurisdiction should demonstrate its work to address opportunities identified in the market study.	
	Puget Sound Regional Council (11/6/24 letter) – Transportation Element	
	Liz Underwood-Bultmann Growth Management Puget Sound Regional Council	
7	<p>Transportation</p> <p><u>Plan Review Consistency Tool</u> 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>Identify maintenance and system preservation projects and programs necessary to maintain the ability of the transportation system to provide safe, efficient, and reliable movement of people, goods, and services (RCW 36.70A.070, MPP-T-1-2, T-4)</p> <p><u>PSRC Comment on Draft Tukwila Plan</u></p>	<p>Travel demand forecasts, safety improvements and projects to meet demands are now included in the background report.</p> <p>Major maintenance and preservation projects and programs are included in the identified project list now included in the background report.</p> <p>All forecasting includes all modes of transportation and land use and job assumptions are consistent throughout all Elements. Projections have been confirmed with PSRC staff that they meet the adopted growth targets for Tukwila.</p> <p>Project projections to 2044 are included and a complete list of projects needed is now in the Background Report. A draft ADA Transition Plan was</p>

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#	<i>Comment</i>	<i>Response</i>
	<p>The travel demand forecast must be consistent with the adopted growth targets and with land use assumptions used throughout the plan. Tukwila has an adopted growth target of 6,500 housing units and 15,890 jobs through 2044. The Transportation Background Report (p. 104) indicates that travel demand modeling was based on growth assumptions of 6,044 households and 11,875 jobs through 2044. The final plan should clearly demonstrate consistency with the adopted growth targets, and all elements and background reports should be internally consistent. Information on these requirements is provided in Commerce’s Transportation Guidebook.</p> <p>The city must identify projects and programs, including roadway projects, non-motorized projects, ADA improvements and system maintenance, necessary to meet transportation demands for at least a ten-year planning period. The city is encouraged to provide a complete project list through 2044. Information on these requirements is provided in Commerce’s Transportation Guidebook and PSRC’s Transportation Element Guidance.</p>	<p>developed in ~2016 and a new Implementation Strategy to update to the ADA Transition Plan is included.</p>

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8	<p><u>Plan Review Consistency Tool</u> 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-II-12, T-6, T-15)</p> <p><u>PSRC Comment on Draft Tukwila Plan</u> The Transportation element should include a complete financing plan and analysis of funding through the 20-year planning period, including maintenance and other programmatic costs. The financing plan should include projected revenue sources that may include reasonably expected, a comparison to expected project costs, identification of potential additional sources to cover any identified funding gaps, and a reassessment strategy should funding fall short. For more information, see WAC 365-196-430, and the Commerce’s Transportation Guidebook (chapter 4I) and Capital Facilities Planning Guidebook.</p>	<p>Financing section has been added to the Background Report, including a multi-year financing plan.</p>
	<p>King County Affordable Housing Committee (10/3/24 letter)</p>	
	<p>Claudia Balducci Affordable Housing Committee Chair King County Councilmember, District 6</p>	

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#	Comment	Response
	Carson Hartmann King County	
1	<p>1. Plan for and accommodate housing needs (CPP H-1)</p> <p><u>Relevant Countywide Planning Policies</u> CPP H-1 requires Tukwila plan for and accommodate its 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.</p> <p><u>Tukwila’s Proposal and AHC Findings</u> Policy H2.2 states that Tukwila will “encourage housing development to all income segments sufficient to meet needs consistent with adopted targets.” However, CPP H-1 requires that jurisdictions <i>plan for and accommodate</i> allocated housing needs for moderate-, low-, very low-, and extremely low-income households, as well as emergency housing, emergency shelters, and permanent supportive housing needs.</p> <p><u>Recommendation 1:</u> To align with CPP H-1, Tukwila should also commit to planning for and accommodating moderate-, low-, very low-, and extremely low-income housing needs, not just growth targets, as well as emergency housing, emergency shelters, and permanent supportive housing needs in Policy H2.2.</p>	<p>Capacity totals are consistent with required targets across income levels. It is recognized that emergency housing capacity is not compliant with Tukwila’s adopted targets and changes to development regulations related to emergency housing allowances per site and buffering between sites need to be updated in the future.</p> <p>Staff will initiate the process to update emergency housing regulations following the Plan’s adoption.</p>
2	<p>2. Identify sufficient capacity of land for emergency housing needs (CPPs H-1 and H-11)</p> <p><u>Relevant Countywide Planning Policies</u> CPP H-1 requires Tukwila plan for and accommodate 1,748 net new housing units, including 1,242 emergency housing beds. CPP H-11 requires jurisdictions identify sufficient capacity of land for emergency housing.</p> <p><u>Tukwila’s Proposal and AHC Findings</u> The draft plan’s Housing Background Report identifies that Tukwila lacks adequate capacity to accommodate its target of emergency shelter and emergency housing. It also identifies</p>	<p>It is recognized that emergency housing capacity is not compliant with Tukwila’s adopted targets and changes to development regulations related to emergency housing allowances per site and buffering between sites need to be updated in the future.</p> <p>Staff will initiate the process to update emergency housing regulations following the Plan’s adoption.</p>

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	<p>intensity of use and spacing requirements that serve as barriers to the development of emergency housing facilities (page 39). Policies and associated implementation strategies in the draft plan address this gap, including a commitment in implementation strategy H2.(4.5).1 to “review and amend regulations and fees for emergency shelters, transitional housing, emergency housing, and permanent supportive housing (STEP Housing) through code amendments and to ensure capacity and feasibility of STEP Housing development.”</p> <p>However, Tukwila did not include an emergency housing capacity analysis. Without this analysis, the AHC cannot determine if Tukwila is planning for and accommodating its emergency housing need and has sufficient land capacity to accommodate its emergency housing need allocation, as required by CPP H-11.</p> <p><u>Recommendation 2:</u> To align with CPPs H-1 and H-11, Tukwila should show sufficient land capacity for its allocated emergency housing needs. Tukwila should follow Washington State Department of Commerce’s guidance for completing an emergency housing land capacity analysis.</p>	
3	<p>3. Prioritize extremely low-income households (CPP H-2)</p> <p><u>Relevant Countywide Planning Policies</u> CPP H-1 requires that Tukwila plan for and accommodate 1,367 units affordable to households below 30 percent of area median income (AMI). CPP H-2 requires Tukwila to prioritize the need for housing affordable to households less than or equal to 30 percent AMI (extremely low-income).</p> <p><u>Tukwila’s Proposal and AHC Findings</u> The draft plan demonstrates sufficient capacity for 0 to 30 percent of AMI housing needs. However, the AHC is concerned that policies and implementation strategies in the draft plan do not prioritize 0 to 30 percent of AMI housing needs. Specifically, Tukwila indicates that Housing Element policy H2.1 and H2.2 and implementation strategy H2.(1-3).1 address CPP H-2. Policy H2.1 states that Tukwila will encourage</p>	<p>Capacity totals are consistent with required targets across income levels. Updates were made to the initial submittal to King County based on Department of Commerce guidance.</p>

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	<p>production in all neighborhoods of diverse housing types that are appropriate for residents in all stages of life and all household sizes. H2.1. states that Tukwila will encourage development affordable to all income segments sufficient to meet needs consistent with adopted targets. Neither of these policies names housing affordable to 0 to 30 percent of AMI households or demonstrates a clear prioritization of extremely low-income households. Implementation strategy H2.(1-3).1, which commits Tukwila to amend its residential development standards to incentivize broader diversity of housing types, increase incentives for affordable housing, and reduce regulations that increase housing development cost, also does not mention extremely low-income households.</p> <p><u>Recommendation 3:</u> To align with CPP H-2, Tukwila should explicitly prioritize the housing needs of extremely low-income households in plan policies and implementation strategies. For examples of strategies Tukwila could use to align with CPP H-2, see the CPP Housing Chapter Technical Appendix.</p>	
4	<p>4. Complete the housing inventory and analysis (CPP H-3)</p> <p><u>Relevant Countywide Planning Policies</u> CPP H-3 directs jurisdictions to conduct a housing inventory and analysis to help identify and address the greatest needs as well as summarize the findings in the Housing Element.</p> <p><u>Tukwila’s Proposal and AHC Findings</u> While Tukwila’s submission includes many data points and substantive analysis, the AHC could not find specific information required by CPPs H-3(b), (g), (m). This includes: b. the number of existing housing units by condition; g. population age by race/ethnicity; and m. the housing needs of communities experiencing disproportionate harm of housing inequities including Black, Indigenous, and People of Color.</p> <p>This analysis should inform additional comprehensive plan policy responses and strategies. For example, analysis responsive to CPP H-3(m) could help Tukwila further identify</p>	<p>Demographic and housing related data points, including by race can be found in Section 2 – “Community Profile” of the housing background report.</p>

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	<p>and address gaps in existing partnerships, policies, and dedicated resources for eliminating racial and other disparities in access to housing and neighborhoods of choice, as required by CPP H-4 and H-20.</p> <p><u>Recommendation 4:</u> Tukwila should include all inventory and analysis components as required by CPP H-3 and summarize the findings in the Housing Element. This additional analysis should inform additional comprehensive plan policy responses and strategies.</p>	
5	<p>5. Identify and address gaps in policies to meet the jurisdiction’s housing needs (CPPs H-4, H-12, and H-13)</p> <p><u>Relevant Countywide Planning Policies</u> CPP H-4 requires jurisdictions to evaluate the effectiveness of existing housing policies and strategies to meet the jurisdiction’s housing needs and identify gaps in existing partnerships, policies, and dedicated resources for meeting housing needs. CPP H-12 requires jurisdictions to adopt and implement policies that improve the effectiveness of existing housing policies and strategies and address gaps in partnerships, policies, and dedicated resources to meet the jurisdiction’s housing needs. CPP H-13 requires jurisdictions to implement strategies to overcome cost barriers to housing affordability.</p> <p><u>Tukwila’s Proposal and AHC Findings</u> Tukwila’s draft Housing Background Report discusses barriers to housing development, specifically housing affordable to incomes below 80 percent of AMI (pp. 36-37). The report also proposes strategies to enable greater affordable housing production, including reducing restrictive development requirements, streamlining development and design review processes, and providing incentives for affordable housing development (pp.37-38). However, this discussion does not outline specific gaps in policy effectiveness, existing partnerships, and dedicated resources, nor specific cost barriers to housing affordability to which outlined strategies are meant to respond. The draft plan</p>	<p>The adequate provisions checklist has been completed and is linked at the end of the housing element.</p>

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	<p>also does not commit the City to implementing any strategies identified in the Housing Background Report. Instead, the draft plan generally proposes to “identify and remove excessive regulatory barriers to housing production” (Policy H1.2), “modify residential zoning designations and development standard to align with city goals” (Policy H1.3) and “pursue establishing, or expanding, programs to provide tax incentives for increased housing development” (Policy H3.2). Therefore, the AHC finds that the draft plan does not meaningfully:</p> <ul style="list-style-type: none"> • evaluate the effectiveness of existing housing policies and strategies to meet the jurisdiction’s housing needs and identify gaps in existing partnerships, policies, and dedicated resources to meet housing needs, as required by CPP H-4; • adopt and implement policies that improve the effectiveness of existing housing policies and strategies and address gaps in existing partnerships, policies, and dedicated resources for meeting the jurisdiction’s housing needs, as required by CPP H-12; and • implement strategies to overcome cost barriers to housing affordability, as required by CPP H-13. <p><u>Recommendation 5:</u> To align with CPP H-4, Tukwila should include an analysis that identifies specific gaps in the effectiveness of existing housing policies and strategies to meet the jurisdiction’s housing needs and identify gaps in existing partnerships, policies, and dedicated resources for meeting housing needs.</p> <p>This analysis should inform draft policies and implementation strategies that address CPPs H-12 and H-13. Tukwila should commit to addressing specific gaps in adopted policies and implementation strategies. Tukwila may provide updated implementation strategies to the AHC in 2025.</p> <p>Please see the Washington State Department of Commerce’s “Adequate Provisions Checklists” as a guide for how Tukwila could conduct a gap analysis and address gaps in policies and strategies.</p>	

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6	<p>6. Prioritize the use of local and regional resources for income-restricted housing (CPP H-14)</p> <p><u>Relevant Countywide Planning Policies</u> CPP H-14 requires jurisdictions prioritize the use of local and regional resources (e.g. funding, surplus property) for income-restricted housing, particularly extremely low-income households, populations with special needs, and others with disproportionately greater housing needs.</p> <p><u>Tukwila’s Proposal and AHC Findings</u> Tukwila indicated in their submitted completeness checklist and implementation strategies that draft policy H2.2 and implementation strategy H2.(1-3).1 address the requirements of CPP H-14. Draft policy H2.2. states that the City will “encourage housing development affordable to all income segments sufficient to meet needs consistent with adopted targets.” Implementation strategy H2.(1-3).1 commits Tukwila to amend its residential development standards to incentivize broader diversity of housing types, increase incentives for affordable housing, and reduce regulations that increase housing development cost.</p> <p>Neither the policy nor implementation strategy demonstrates an intention to prioritize local or regional <i>resources</i>, such as funding or surplus public land, for income-restricted housing. Policy H2.2 and implementation strategy H2.(1-3).1 also do not mention regional or local resources or refer to extremely low-income households, populations with special needs, or other groups with disproportionately greater housing needs.</p> <p><u>Recommendation 6:</u> To align with CPP H-14, Tukwila should include a policy and implementation strategy that commits Tukwila to prioritizing available resources for income-restricted housing (e.g. funding, surplus property), particularly extremely low-income households, populations with special needs, and others with disproportionately greater housing needs. For strategies to align with CPP H-14, see the CPP Housing Chapter Technical Appendix</p>	<p>Housing Element policies listed below address allocating local funds, resources or incentives to support affordable housing:</p> <ul style="list-style-type: none"> • H3.2: Pursue establishing, or expanding, programs to provide tax incentives for increased housing development. • H3.4: Continue to work closely with South King Housing and Homelessness Partnership (SKHHP) and other partners to achieve development of subsidized affordable housing for very low-, low- and moderate-income households. • H4.6: Continue to support the maintenance, weatherization, rehabilitation, and long-term preservation or replacement of existing housing for low- and moderate-income residents. • H4.8: Support programs and City actions that increase homeownership opportunities for vulnerable populations. • H4.9: Adopt renter protections to ensure stable housing for Tukwila Renters.

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7	<p>7. Expand and support the supply of income-restricted housing near high-capacity and frequent transit while mitigating displacement (CPPs H-16, H-17, H-21, and H-23)</p> <p><u>Relevant Countywide Planning Policies</u> CPP H-16 requires jurisdictions to expand the supply and range of housing types, including affordable units, at densities sufficient to maximize the benefits of transit investments throughout the county. CPP H-17 requires jurisdictions to support development and preservation of income-restricted affordable housing near high-capacity transit. CPP H-21 requires that jurisdictions adopt policies and strategies that promote equitable development and mitigate displacement risk; mitigate displacement that may result from planning efforts, large-scale private investment, and market pressure; and implement anti-displacement policies prior to or concurrent with development capacity increases and public capital investments. CPP H-23 requires that jurisdictions adopt and implement policies that protect housing stability for renter households and expand protections and supports for moderate-, low-, very low-, and extremely low-income renters and renters with disabilities.</p> <p><u>Tukwila’s Proposal and AHC Findings</u> Tukwila’s draft plan’s future land use map (FLUM) proposes both “High Density Residential” and “Regional Commercial Center” zones—both of which allow for housing types typically affordable to households below 80 percent of AMI—in close proximity to the Tukwila International Boulevard Link light rail station. The FLUM also proposes maintaining high-density residential districts along frequent and high-capacity transit routes, include Metro’s RapidRide. The draft plan designates the zone in immediate proximity to the city’s Sounder station as a “Tukwila Urban Center – Transit Oriented Development” zone which contains a substantial portion of the city’s total capacity for housing types typically affordable to households earning less than or equal to 80 percent of AMI.</p>	<p>It is recognized that additional density increases are needed near the Tukwila International Boulevard Light Rail Station, and that this area is also the most a risk for displacement of lower-income and BIPOC populations.</p> <p>Staff anticipates continuing previously unfinished subarea planning around the TIB station in the second half of 2025. This will include proposals increase density allowances and incorporate anti-displacement measures for existing NOAH and lower-income renters.</p>

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	<p>The AHC commends these efforts to orient future housing development around frequent and high-capacity transit; however, the AHC finds that proposed plan does not meaningfully expand the supply and range of housing types, including affordable units, at densities sufficient to maximize the benefits of these transit investments, particularly light rail and RapidRide, as required by CPP H-16. The plan also does not meaningfully support the development and preservation of income-restricted affordable housing that is within walking distance of these existing high-capacity and frequent transit investments, as required by CPP H-17.</p> <p>Specifically, the draft plan maintains low-density zones within one-quarter and one-half-mile buffers of its existing light rail station, RapidRide stops, and frequent transit stops, particularly along International Boulevard directly south of State Route 518 and west of State Route 599 (Housing Background Report, page 36). Many of these areas are also designated as “qualified census tracts” by the Department of Housing and Urban Development, which are more likely to see federal low-income housing tax credit investment than others (Housing Background Report, page 6). The draft plan also does not commit to adopting any specific incentives for affordable development within zones near transit, despite discussing such incentives in the Housing Background Report (page 37).</p> <p>The AHC recognizes that Tukwila has identified areas nearby International Boulevard as at high risk of potential displacement and that increased development capacity sufficient to maximize nearby transit investments could result in unintended displacement of low-income renters, immigrant households, and communities of color from homes and businesses (Housing Background Report, pp.32-34). However, the AHC considers low-income housing development to be a key anti-displacement strategy. There is also potential for Tukwila to implement new tenant protections and other displacement mitigation and equitable development measures to support potentially impacted communities, in alignment with CPPs H-21 and H-23.</p>	

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	<p><u>Recommendation 7</u>: To align with CPPs H-16 and H-17, Tukwila should amend, edit, or propose new land use and housing element policies and implementation strategies to support the development and preservation of affordable housing near its existing light rail and RapidRide stations. The City should also implement new, higher density zones or overlays and affordable housing incentives that would support the development and preservation of affordable housing near transit.</p> <p>Concurrent with development capacity increases, Tukwila should implement measures that mitigate the involuntary relocation of residents, cultural assets, and businesses from their current locations and promote equitable development in areas at high-risk of displacement, particularly nearby to International Boulevard, in alignment with CPP H-21. Tukwila should also expand renter protections, in alignment with CPP H-23. For strategies to align with CPPs H-21 and H-23, see the CPP Housing Chapter Technical Appendix</p>	
	<p>Washington Department of Natural Resources; Washington Geological Survey (10/30/2024)</p>	
	<p>Tricia R. Sears (she/her/hers) Geologic Planning Liaison Washington Geological Survey (WGS) Washington Department of Natural Resources (DNR) Cell: 360-628-2867 Email: tricia.sears@dnr.wa.gov</p>	
1	<p>In keeping with the interagency correspondence principles, I am providing you with comments on Tukwila’s Comprehensive Plan and Development Regulations update (Commerce ID# 2024-S-7496).</p> <p>For this proposal submitted via Planview, I looked at the proposal and focused on areas related to WGS work. Of</p>	--

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	<p>note, but not limited to, I look for language around the geologically hazardous areas, mineral resource lands, mining, climate change, and natural hazards mitigation plans.</p> <p>Specifically in this proposal, I reviewed the Draft Comp Plan Elements – Tukwila document. I focused on the Land Use Element, the Natural Environment Element, the Shoreline Element, and the Utilities Element.</p>	
2	Land Use Element: Critical areas are mentioned in Policy LU 1.3 and Goal 2. Climate change is mentioned once in Policy LU 6.2.	<p>In the draft Comprehensive Plan, the following goals and policies address critical areas specifically:</p> <ul style="list-style-type: none"> • Community Character: Policy 8.16 • Land Use: Goal 2 • Natural Environment: Goal 2; policies 5.1, 8.6, 9.1 through 9.6 • Shoreline Policies 9.1 and 2.1 • Capital Facilities 2.7 and 3.1 to 3.4 <p>The following Implementation Strategies also address critical areas specifically:</p> <ul style="list-style-type: none"> • Natural Environment: 9.1-6.1 through 9.1-6.5 and 11&12.all.3, and 11&12.all.11 through 13. • PROS: 6.1-8.13 <p>Climate Change is referenced in the following goals and policies:</p> <ul style="list-style-type: none"> • Community Character: Policy 8.14 • Land Use: Policy 6.2 • Housing Policy 2.9 • Economic Development Policy 3.7 • Natural Environment: Goal 1 • Transportation Goal 5, and policies 5.5, 5.6. and 5.7, 5.8, 5.9, and 5.10 • Utilities Policy 1.16 • Capital Facilities Policy 2.3 <p>And Implementation Strategies</p> <ul style="list-style-type: none"> • Natural Environment 11&12.all.2 • Utilities 1.16.2
3	Natural Environment Element: That link goes to the Shoreline Element. There was no other link or option to review the Natural Environment Element.	
4	Shoreline Element: Critical areas are mentioned in Policy 9.1.	
5	Utilities Element: On page 1 it notes, “Policies pertaining to utilities and vegetation are located in the Natural Environment element.” Climate change is noted in Policy LU 1.16 and Policy LU 1.21.	

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6	<p>On page EN-1 and EN-2, the sequence of information is a little off. Paragraph 4 on page EN-1 seems like it should be located elsewhere so that the box (Figure #?) on page EN-2 goes directly after the statement, “Some of the benefits of trees are shown as follows.”</p>	<p><i>(The response to these comments was provided in an email – below is excerpted from that email)</i> Noted. This will be addressed in final formatting</p>
7	<p>On page EN-5, EARTH RESOURCES AND GEOLOGIC HAZARDS “The City has mapped areas with steep and unstable slopes, including active landslide areas, to ensure that there is adequate review of slope stability if development is proposed in these areas. In addition, there are coal formations on the southwest side of Interurban Avenue South, some of which have been mined and are defined as environmentally critical areas based on the City of Tukwila Abandoned Underground Coal Mine Hazard Assessment, May 1990.” Suggest stating which of the geologically hazardous areas exist in Tukwila, and then noting that the development regulations are in Title xyz of the Tukwila code. It would be good to have a map of the geologically hazardous areas.</p>	<p>Critical areas are shown on our City GIS system, and if appropriate, our code requires submittal of a geotechnical study. I have augmented the reference to critical areas and geologically hazardous areas in the Background Report, p. 3:</p> <p>Tukwila’s critical areas regulations also define and map geologically hazardous areas and coal mine hazard areas and require geotechnical evaluations and corresponding design requirements to reduce risks created by development in such areas. <u>These critical areas are shown on the City’s iMap GIS system, and the Washington Department of Natural Resources has developed an interactive database that can serve as a resource for identifying geologic information: Geologic Information Portal / WA-DNR.</u></p>
8	<p>On page EN-7, “Recently, King County created a heat map⁴, showing how Tukwila, with a relatively large, paved footprint, can reach extremely high temperatures and is unable to cool at night during extreme heat events.” Do you plan to include “heat map”?</p>	<p>We will provide this link to King County’s heat map – the County is in a better position to complete the analysis needed to develop such a map, and the City doesn’t have resources to maintain this map. We recognize that it demonstrates that there is a concern about the outcome of heat events; this condition drives other policies that the City has adopted (e.g., tree canopy, etc.)</p>
9	<p>Good to see Goal EN-9 regarding geologically hazardous areas and Goal EN-13 regarding climate change.</p>	<p>I have attached a sheet listing out many of the Goals, Policies, and Implementation Strategies that specifically address critical areas and climate change – this list is based on the various Comp Plan elements; there are additional references in the various elements’ Background Reports. The City is scheduled to develop its climate change element in 2029.</p>

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10	<p>None of the Elements I reviewed included much of a description of the connections between this comprehensive plan and other plans like the hazard mitigation plan, the climate plan*, the transportation plan, and so forth. Many of the comprehensive plans I've reviewed have lists or paragraph descriptions of related plans.</p>	<p>The Comp Plan has adopted by reference many other City Plans, and various other plans. Some of those plans are discussed briefly in the 2024 Comp Plan. The Transportation Element/Plan draft (which was completed in late September) and is part of this Comp Plan.</p> <p>* As noted, the City will develop a climate plan in 2029, although there are many policies throughout the 2024 Comp Plan that address Climate Change.</p>
11	<p>Overall, the Comp Plan Elements reviewed were written well, but reveal a lack of detail on critical areas (including geologically hazardous areas), climate change, hazards, hazard mitigation plans, and how those are integrated in land use planning in Tukwila, with comprehensive plan elements, development regulations, climate plans, transportation plans, hazard mitigation plans and so forth. Many of the comprehensive plans I have reviewed include more details on these areas, for example including narrative, maps, and lists of related plans. If it would be helpful, I can provide you with some examples of comp plans that have this information more integrated.</p>	<p>Noted. Thank you for your offer.</p>
12	<p>Below, I include our usual language for future endeavors.</p> <p>Recognizing the limitations of the current proposals, I want to mention that it would be great for you to consider these in current or future work, be it in your comprehensive plan, development code, and SMP updates, and in your work in general:</p> <ul style="list-style-type: none"> Consider adding a reference to WAC 365-190-120 geologically hazardous areas for definitions in other areas besides the CAO. In addition, consider adding a reference to WAC 365-196-480 for natural resource lands. 	<p>This language was added to the Natural Environment Background Report, p.3, and p.EN-2 of the Element:</p> <p>The Washington State Growth Management Act (GMA) requires counties and cities to designate and adopt policies and development regulations to protect critical areas (<u>RCW 36.70A.050; WAC 365-190</u>).</p> <p>The Natural Environment Element sets forth goals and policies to guide the protection and management of wetlands, watercourses, springs, fish and wildlife habitat areas, and geologically hazardous areas – collectively called “environmentally critical areas”. It also includes goals and policies related to flood management, surface water management, water quality, and the urban forest (the combination of trees, shrubs and other plants that make up the formal landscaped areas of the City and the natural areas in our</p>

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		parks and on private property). <u>The policies and development regulations addressing critical areas in Tukwila are guided by the Washington State Growth Management Act (RCW 36.70A.050; WAC 365-190).</u>
13	<ul style="list-style-type: none"> Consider adding a reference to the WGS Geologic Information Portal in other areas besides the CAO. If you have not checked our interactive database, the WGS Geologic Information Portal, lately, you may wish to do so. Geologic Information Portal WA - DNR 	<p>This language was added to the Natural Environment element, p. EN-2</p> <p>Tukwila’s critical areas regulations also define and map geologically hazardous areas and coal mine hazard areas and require geotechnical evaluations and corresponding design requirements to reduce risks created by development in such areas. <u>These critical areas are shown on the City’s iMap GIS system, plus the Washington Department of Natural Resources has developed an interactive database that can serve as a resource for identifying geologic information: Geologic Information Portal / WA-DNR.</u></p>
14	<ul style="list-style-type: none"> If you have not checked out our Geologic Planning page, you may wish to do so. Geologic Planning WA - DNR 	Noted. Thank you.
Planning Commission (remaining questions)		
1	<p>Policy Change recommended in comment received at 3-14-24 Planning Commission Public Hearing (comment from Tukwila Human Services Department)</p> <p>Policy CC-8.1 Support Implement the City’s human services strategic approach and program in providing to support a solid foundation for all Tukwila residents through by providing high-quality services and actively collaborating with service providers to help meet basic needs and job readiness, including:</p> <ul style="list-style-type: none"> Safety net for urgent and basic needs, 	Staff recommended version shown in draft Plan. (as shown in track changes to the left)

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	<ul style="list-style-type: none"> • Positive and healthy relationships, • Support for self-sufficiency, and • Information referral (and system navigation). 	
2	<p>PC vote tied 3:3 on whether to strike the policy (1-25-24)</p> <p>Policy LU 7.5 Mitigate potential displacement from City actions through communication and collaboration with existing tenants, business and property owners, and seek to replace lost commercial and residential spaces within redevelopment.</p>	<p>Staff recommends retaining the policies as shown in the Land Use element. This policy protects Tukwila residents and/or businesses from displacement by communicating and assisting in locating replacement locations/ development.</p>
3	<p>PC vote tied 3:3 on whether to strike the policy (1-25-24)</p> <p>Policy LU 7.6 Emphasize preserving and replacing affordable housing in redevelopment.</p>	<p>Staff recommends retaining the policies as shown in the Land Use element. This policy focuses on protection of residents in affordable housing.</p>
Public Comment		
<p>Mike Pruett Segale Properties 5811 Segale Park Drive C Tukwila WA 98138 / 206/575-200</p>		
	<p><u>Comment/Question #1.</u> Page 69 of Attachment C indicates the city will implement “reasonable measures” such as changing zoning and permitting procedures and other measures to speed housing production. Can you elaborate/provide more detail on what changes will occur and how that will accelerate housing production?</p>	<p>Reasonable measures are actions that counties and cities in Washington state can take to address inconsistencies in their comprehensive plans and to remedy the supply of buildable land. Because Tukwila fell short in both its housing and employment development rates, Tukwila is required to provide Reasonable Measures to rectify the predicted shortfall.</p> <p>Options that the City can consider are listed in the Implementation strategies listed in the of City’s TOD Housing Action Plan, and in the Goals and Policies listed in the Housing Element and Land Use Element. Further discussion of potential measures to increase</p>

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		<p>housing production can be found one pages 37-38 of the Housing Background Report. As you know an MFTE program was reinstated and expanded by the City after the recommendation of reasonable measures. Qualifying projects in the Tukwila South Overlay and Tukwila Urban Center are eligible for 8 or 12 year MFTEs, as codified in TMC 3.90.</p>
	<p><u>Comment/Question #2</u>. The top of page 81 of Attachment C contains a statement that we had addressed in previous emails to the City during the comment period on the Comprehensive Plan. Our concern about the language used here remains unchanged from the comments in the attached emails above. Including such a statement in the comprehensive Plan does nothing to support and promote development but instead casts doubt and uncertainty on the Tukwila South project that will most certainly be negatively viewed by the development community we are trying to attract to Tukwila South/Prato District. First it is not necessary for a developer to make a substantially larger investment in Tukwila South than any other development site. In fact, Segale has worked very hard to lower the investment in infrastructure (and time) necessary for a developer to get a project out of the ground. Core key infrastructure is already built. Entitlements are already largely taken care of. Administrative design review is the only step necessary to get to construction documents, making this the fastest potential shovel ready large development opportunity in the region. The concern about cohesive mixed-use development is also a negative statement that may dissuade development in Tukwila South. Any development proposed within Tukwila South must pass through the filter of Segale, as well as the City of Tukwila, prior to being approved and constructed, so</p>	<p>The language cited on page 81 is from the Economic Development element and can be removed.</p>

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	<p>there is more than enough opportunity to ensure project cohesiveness. There are also residential design guidelines and standards that further provide for cohesiveness and commercial development guidelines that also do the same. The Tukwila South approval and Development Agreement provided a vision for the future that can and will be followed. Its time to let go of negative statements about the project that have persisted in city documents through the years.</p>	
	<p><u>Comment/Question #3.</u> Attachment D of the Comp Plan again mentions “reasonable measures” to correct Tukwila’s historically low housing and employment growth. We would like to discuss and understand what policies and implementation measures that city is considering and how they might relate to the Tukwila South/Prato District opportunity.</p>	<p>As noted above, there are a range of implementation options the City can consider (as noted in links above). Please see the response to Question #1 for further links to discussion and policies within the plan update. We would be happy to discuss how these options may apply to Tukwila South/Prato District.</p>
	<p><u>Comment/Question #4.</u> Why is the TVS zoning designated areas discussed on this page. The TSO overlay supersedes the TVS zoning. Shouldn’t there be a paragraph on the TSO zoning and the opportunities it provides rather than the underlying zoning the TSO zoning supersedes?</p>	<p>This discussion was grouped by zones, then by overlays. The TSO is an overlay that augments the TVS zone – The zone identifies the preferred land use, while the overlay adds additional regulations to that zone. If the overlay went away, the zone would still be there.</p> <p>The following proposed policies address Tukwila South:</p> <p>LU 4.2 addressing the Tukwila South Overlay is grouped by zoning classifications affected: <i>Areas under the Tukwila South Overlay includes lands designated TVS, HI, LDR and MUO, and supersedes the provisions of the underlying zoning districts. It is intended to create a multi-use employment center containing high technology, office, commercial, retail and residential uses at the south end of the City.</i></p> <p>LU 3.10 addresses the TVS zone: The Tukwila Valley South (TVS) designated areas are characterized by high-intensity regional uses that include commercial services, offices, light industry, warehousing and retail, with heavy industrial subject to a Conditional Use Permit. Mixed-use residential is</p>

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		<p>conditionally permitted within 500 feet of the Green River. These uses and densities are modified where covered by the Tukwila South Overlay.</p> <p>This area was addressed in the 2015 Plan as follows:</p> <p>Tukwila Valley South: A specific area characterized by high-intensity regional uses that include commercial services, offices, light industry, warehousing and retail, with heavy industrial subject to a Conditional Use Permit. Mixed-use residential is conditionally permitted within 500 feet of the Green River. These uses and densities are modified where covered by the Tukwila South Overlay.</p> <p>Tukwila South Overlay: This master plan overlay area includes lands designated TVS, HI, LDR and MUO, and supersedes the provisions of the underlying zoning districts. It is intended to create a multi-use employment center containing high technology, office, commercial, retail and residential uses at the south end of the City. <i>(See Tukwila South element in Plan text.)</i></p> <p>Tukwila South Master Plan Area: This area extends generally south of the Southcenter Subarea to South 204th Street. It is based on unique conditions including the presence of significant water features such as wetlands, watercourses and the river; topographic changes that will influence the future development of the land; and a large contiguous area of land in single ownership that will allow for unique planned development opportunities. <i>(See Tukwila South element in Plan text.)</i></p>
	<p>Brian Kennedy 7/31/24</p>	
	<p>I've live here since 1978. My wife is from Ireland and they have a Tidy Town competition. We need to have a competition between towns and one among residents for the cleanest and most beautiful towns and peoples yards with substantial prizes donated by local businesses. The planter dividers on our streets should constantly be landscaped; we shouldn't have to click fix them. The city needs to enact strict rules on loitering and public intoxication. These people should be</p>	<p>Thanks for your comments. I have taken the liberty of sorting them by City department likely to be involved:</p> <p>I've live here since 1978.</p> <ul style="list-style-type: none"> • Economic Development/Public Works: <ul style="list-style-type: none"> • My wife is from Ireland and they have a Tidy Town competition. We need to have a competition between towns and one among residents for the cleanest and most beautiful towns and peoples yards with substantial prizes donated by local businesses.

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	<p>interviewed to see where their situation stands and get them help to bring them up and off the streets. Shoplifters should not be able to just steal and walk away; they should be accountable. We should not have to click fix graffiti, garbage, illegal parking etc. The city should be on top of it every day. Our parks should be safe, especially Bicentennial Park and Tukwila Pond. The homeless should not be able to take over these parks, these parks should be celebrated not abused. Tukwila Pond is a great asset; it should be a destination spot. The city could partner with Double Tree to use it for a comfortable terrace with a restaurant or cafe that the hotel guests and Tukwila citizens can enjoy. A street light or stop sign on 133d & Military Road meets. There have been many many wrecks there. The Mall, the city and the State need to fund more police officers . The Southcenter taxes to the State needs to be renegotiated to have this happen . Tukwila Days needs to come back. Most towns in the area have fairs and events; Tukwila is boring.</p>	<ul style="list-style-type: none"> • The planter dividers on our streets should constantly be landscaped; we shouldn't have to click fix them. • Police: <ul style="list-style-type: none"> • The city needs to enact strict rules on loitering and public intoxication. These people should be interviewed to see where their situation stands and get them help to bring them up and off the streets. • Shoplifters should not be able to just steal and walk away; they should be accountable. • Police/Public Works: <ul style="list-style-type: none"> • We should not have to click fix graffiti, garbage, illegal parking etc. The city should be on top of it every day. • Parks/Police/Human Services: <ul style="list-style-type: none"> • Our parks should be safe, especially Bicentennial Park and Tukwila Pond. The homeless should not be able to take over these parks, these parks should be celebrated not abused. • Parks: <ul style="list-style-type: none"> • Tukwila Pond is a great asset; it should be a destination spot. The city could partner with Double Tree to use it for a comfortable terrace with a restaurant or cafe that the hotel guests and Tukwila citizens can enjoy. • Tukwila Days needs to come back. Most towns in the area have fairs and events; Tukwila is boring. • Public Works: <ul style="list-style-type: none"> • A street light or stop sign on 133d & Military Road meets. There have been many many wrecks there. • City Budget: <ul style="list-style-type: none"> • The Mall, the city and the State need to fund more police officers . • The Southcenter taxes to the State needs to be renegotiated to have this happen . <p>RESPONSE: I will look at how we could integrate these comments into the Implementation Strategies for the Plan (although some of your comments are very specific and not typical of the types of items listed as Implementation Strategies). I will also forward them to the</p>

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		various City departments and ask those representatives to follow up with you if they have questions (or you could contact them directly: see https://www.tukwilawa.gov/ for more information). Thanks for providing your ideas.
	<p>Michelle Eggert Public Comments – Tukwila City Council Comprehensive Plan and Ryan Hill Zoning Monday, Sep. 23, 2024</p>	
	<p>The speaker advocated for the Ryan Hill area to be rezoned to allow additional housing for all income levels in preparation for a potential light rail station at Boeing Access Road.</p>	<p>While staff agrees that subarea planning, including potential zoning changes, should be undertaken for areas surrounding the future infill light rail station, it is premature to change development standards with the periodic update of the comprehensive plan based on several factors.</p> <ol style="list-style-type: none"> 1. The preferred alternative for the infill station has not yet been determined, nor has the final station location been finalized. In communications with Sound Transit it is currently anticipated that a preferred alternative will be selected by the Sound Transit Board in January or February of 2025, and a final location will be confirmed in Fall 2025. Two locations are currently being considered, one adjacent to Boeing Access Road (BAR) and the other just North of South 112th St and East Marginal Way. 2. The station is not anticipated to begin construction until 2028, and not anticipated to open until December 2031. The City has the opportunity through annual comprehensive plan amendments and other code updates to amend zoning and/or development regulations for another seven years or more before the station opens. Staff also believe a public process, including further engagement with residents and stakeholders should take place to determine the future for the area. 3. Although the aerial distance between many Tukwila properties off of Ryan Way are within a ½ mile from the Boeing Access Road potential station location, there are significant impediments to traveling between the site without a car that will need to be rectified prior to the opening of the station. These impediments, such as a lack of sidewalk access over the BAR bridge, interchanges, high traffic speeds, lack of bicycle infrastructure and heavy truck traffic, will need to be address through capital planning and project which will take several years. Without the station and

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		<p>associated improvements, the area does not currently support transit-oriented development (TOD), and to rezone to TOD style development without supportive improvements would be premature.</p> <p>4. The area within the station buffer is current within a Manufacturing and Industrial Center (MIC) designated by the Puget Sound Regional Council (PSRC). As part of designated center this area is intended to support a clustering of industrial jobs, not necessarily compatible with a TOD development concept. While staff agrees that the boundary for the MIC should revisited and likely amended, this process is required to take place with consultation with PSRC.</p>
	<p>Mary Fertakis Public Comments – Tukwila City Council Comprehensive Plan and BAR Station Language Monday, Nov. 18, 2024</p>	
	<p>There appear to be 4 components of the comprehensive plan that have a connection to the BAR Station project, with goals and policies that intersect and support each other:</p> <ul style="list-style-type: none"> • Vision • Transportation • Land Use • Economic Development <p>The meetings we have had with Sound Transit’s community engagement staff have continued to emphasize the importance of being able to connect Tukwila’s vision to this project. I was glad to see specific language related to the BAR Station and these components of the Comp plan, and would like to offer some specific language suggestions to strengthen this connection.</p>	<p>1) That communications with Sound Transit cite the specific goals and policies of the Comp Plan related to the BAR Station design and decision-making to make the connection to the Vision clear.</p> <ul style="list-style-type: none"> a. There is substantial communication and lobbying that has taken place over many years between the City and Sound Transit. Staff agrees that future visioning should take place to ensure development standards and allocated resources are aligned with the desire for the station area. However, with a final station location not formally selected, and an anticipated timeline of a 2028 construction start and 2031 opening, if it is determined that Plan policies should include specific guidance, those changes could be made during the annual updates of the Plan to ensure there is adequate public engagement in the process. <p>2) That specific reference to the historical and cultural importance of the Duwamish Hill Preserve, and Tukwila & King County salmon recovery areas that are immediately adjacent to the proposed station site be included in the Comp Plan.</p> <ul style="list-style-type: none"> a. The Duwamish Hill Preserve is addressed as a Special Use Park in the Plan’s Parks, Recreation, and Open Space Plan. Staff will look to add language regarding the cultural significance of the Duwamish Hill Preserve to the Native

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	<p><u>Vision:</u></p> <ul style="list-style-type: none"> • Section on Respect for the Past & the Present (pg. I-9 & I-10) <i>“The Coast Salish Tribes have lived here since time immemorial and while each tribe is unique, all share in a deep historical connection and legacy of respect for the land and its natural resources. These sovereign tribal nations enrich the region through environmental stewardship, cultural heritage, and economic development.”</i> <ul style="list-style-type: none"> ○ There is no specific mention that I could find in the Comp Plan of the Duwamish Hill Preserve. • <i>“We cooperate with residents to improve neighborhood infrastructure. We encourage neighborhood pride and interaction.”</i> <ul style="list-style-type: none"> ○ The Allentown & Duwamish neighborhoods adjacent to the proposed sites are a transportation desert as well as lacking other forms of infrastructure. We want to see a station that supports needed infrastructure and is an enhancement to the neighborhoods. <p><u>Land Use:</u></p>	<p>American Culture and Settlement in Tukwila Area section of the Community Character Element.</p> <ul style="list-style-type: none"> 3) That the reference to zoning the area where the proposed station will be located, listed as Policy LU 9., includes language that specifically says it will be revised to be a TOD “island” to support economic development in the immediate area. <ul style="list-style-type: none"> a. The area is currently within the Manufacturing and Industrial Center designation, an area designated for industrial uses that supports economic growth. In order to change the designation boundary, the City would need to consult with the regional planning body Puget Sound Regional Council (PSRC) which oversees center designations. As the City updates its center designations in 2025, it will consult with PSRC and explore removing an area around the station from the existing MIC boundary. 4) That a preference for “structured parking” (a parking garage) be specified for the BAR station just as it is for the TIB station section on pg. LU-14 <ul style="list-style-type: none"> a. The reference to structured parking in Policy LU 11.7 refers to parking associated with uses around the existing TIB station, not the station itself. Requirements for parking for future uses will be analyzed with future zoning and development regulation updates for the area.

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	<ul style="list-style-type: none"> • Goal 9 – Boeing Access Road Station Area on pg. LU-12 <i>“Zoning and development regulations will be evaluated, and amended to anticipate and adapt to impacts on the area with consideration for long term vision, compatibility, and equity.”</i> <ul style="list-style-type: none"> ○ This is currently zoned as a Manufacturing Industrial Center (Heavy) and would need to be re-zoned as a TOD “island” in order do the type of economic development in line with Comp Plan goals. ○ Re-zoning is also mentioned in the Transportation segment in tonight’s materials under the Connectivity section, designated as T3.5 on pg. 9. <p><u>Transportation:</u></p> <ul style="list-style-type: none"> • Goal 5 – Environment <i>“Support, encourage, and implement transportation programs and improvements that promote water quality and regional air quality.” (T5.6, pg. T-14)</i> <ul style="list-style-type: none"> ○ Parking lots create large impervious surfaces that change the environment and cause pollution runoff impacting the immediate area. Parking “structures” (garages) 	

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	<p>reduce this concrete footprint and are a much better use of land in urban areas.</p> <p><u>Language Requests for Council Consideration:</u></p> <ol style="list-style-type: none">1) That communications with Sound Transit cite the specific goals and policies of the Comp Plan related to the BAR Station design and decision-making to make the connection to the Vision clear.2) That specific reference to the historical and cultural importance of the Duwamish Hill Preserve, and Tukwila & King County salmon recovery areas that are immediately adjacent to the proposed station site be included in the Comp Plan.3) That the reference to zoning the area where the proposed station will be located, listed as Policy LU 9., include language that specifically says it will revised to be a TOD “island” to support economic development in the immediate area.4) That a preference for “structured parking” (a parking garage) be specified for the BAR station just as it is for the TIB station section on pg. LU-14	

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	Continued Staff Review	
	Minor update acknowledging that the City’s Critical Areas Ordinance will be reviewed and updated in 2025.	Sentence added, page EN-3 In 2025, the City will revisit its Critical Area regulations to ensure that they reflect current best practices and recent legislative requirements.