Outlook

Letter to Planning Commission on Titles 17 and 18

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To DCED Distribution Group <dced@sequimwa.gov>; Karla Boughton <kboughton@sequimwa.gov>; Travis Simmons <tsimmons@sequimwa.gov>

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Hi Karla and Travis, please find our comments below for the Planning Commission meeting on Tuesday.

The Westbay development team wish to thank the City staff and Planning Commission for their diligent work on the Comprehensive Plan and Municipal Code updates. We strongly support the City's objective to create a more predictable and consistent development process and appreciate the opportunity to comment as the process progresses. We have reviewed the updated versions of Title 17 and new Chapter 18.21 and want to provide the following comments:

TITLE 17 – LAND DIVISION

- 17.20.030 Street Design Standards
  - One of the stated goals of the update is to better align with the Transportation Master Plan (TMP), SMC Title 12, and the most current adopted city engineering standards. Please note that the current TMP and the most current adopted city engineering standards do not match. There are street sections in the TMP that were never implemented into the city engineering standards which make it difficult for developers to help the city achieve their vision from the TMP. We understand the TMP is being updated with the current comprehensive plan update but we have not yet seen it and we hope to provide comments when appropriate.
- 17.20.070 Underground Utilities and Street Lights
  - We recommend providing more clarity that undergrounding of existing dry utilities for frontage improvements can be worked out with the provider rather than a blanket requirement. We are planning to underground the dry utilities through Westbay but can see scenarios where this requirement or the phasing of this requirement would not be feasible. We recommend adding language that allows for feasibility-based coordination with utility providers. This ensures that infrastructure improvements are proportional to the project's impact rather than a barrier to entry.
  - For private streets we recommend allowing more flexibility on the street light requirements as the lights will be owned and maintained by the subdivision's HOA and not the city.
  - Does the payment by a developer to non-city utility providers need to be addressed in Title 17? This seems to provide codes for City Staff to have to track that is between a developer and another company. Many times utility extensions end up being for many users and how that cost is split is better left up to the developer and the private utility company.

CHAPTER 18.21 – SUPPLEMENTAL HOUSING REQUIREMENTS

- **Residential Parking Requirements (18.21.040)** We commend the City for syncing these codes with state mandates and introducing parking flexibility. As the City prepares for a full re-write of Title 18, we suggest following state RCW 35.21.994 for parking minimums, especially in urban downtown and PRC zones. The city's current code requires double that of the state code for single family up to fourplexes (2 parking stalls per unit in Sequim and 1 in state code) and three times as much parking for multifamily units (1.5 parking stalls per unit in Sequim and 0.5 in the state code). In addition, being able to apply parking requirements holistically through subdivisions allows parking to be sized appropriately to actual need.
  Although Sequim is currently under the 30,000-resident threshold for following RCW 35.21.994, the state's move to reduce parking minimums is a proven driver of housing affordability and pedestrian-oriented design. We encourage the Commission to adopt these modern standards now. Lowering parking minimums allows for more green space and lower per-unit costs which makes it more feasible to create attainably priced housing.

Thank you again for the opportunity to comment and please let us know if you have questions or would like to discuss any of this in more detail.
Sam

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