

Attachment B: Final Planning Commission Issues Matrix
SEPA Exemption Threshold Zoning Code Amendment
(LAND-2013-00579)

Issue	Discussion Notes	Status
<p>1. Provide SEPA threshold data that goes back to 2004 (Biethan)</p>	<p><u>PC Preliminary Direction</u> Provide SEPA data that goes back to 2004 so the Commission has a better understanding of the threshold determinations issued by the City prior to the economic downturn.</p> <p><u>Staff Recommendation & Reasoning</u> Staff has provided this information in a separate document. Since 2004, 98.6% of the threshold determinations issued for the five general areas subject to increased threshold exemption levels were Determination of Non-Significances (DNS). This information shows a total of 146 threshold determinations issued, 144 of which were a DNS and 2 of which were a Mitigated Determination of Non-Significance (MDNS).</p> <p><u>Public Comments</u></p> <p><u>PC Discussion</u> The commission was satisfied with the additional information presented regarding SEPA data from the years 2004 through 2012.</p>	<p>5/22 Information Request 6/12 CLOSED</p>
<p>2. What was the SEPA Advisory Committee's rationale for some of the new exemption level thresholds? (Gregory, Miller)</p>	<p><u>PC Preliminary Direction</u> It would be helpful to know the rationale for the new exemption level thresholds. This background information could be useful to the Commission's deliberations.</p> <p><u>Staff Recommendation & Reasoning</u> Staff has reviewed the DOE website for SEPA Advisory Committee minutes. There is some information on the rationale for the new exemption level thresholds, but there are no specifics to deriving the actual numbers, with the exception of landfilling and excavation. Different interest groups had differing rationales. In general, however, the input is summarized as follows.</p> <p><i>Single Family Residential:</i> General interest in increasing levels in urban growth areas, and final number was in the range of various proposals discussed.</p>	<p>5/22 Information Request 6/13 Additional Information Requested 6/19 CLOSED</p>

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	<p><i>Multi-Family Residential:</i> Similar to single family, there was a range of numbers discussed. There was support to increase the exemption level since multi-family housing results in fewer environmental impacts, is more efficient to serve with infrastructure, and helps meet growth management targets.</p> <p><i>Agriculture:</i> Greater maximum in designated agricultural lands to advance GMA goal of fostering long term commercial agriculture in such areas and support right to farming provisions.</p> <p><i>Commercial:</i> Sizes discussed were considerable larger. Initially 60,000 sq. ft. was discussed as it is roughly the size of a Trader Joe's plus a few supportive uses. This supports walkable communities and reduces traffic within urban growth areas. However, ultimately half that size (30,000 sq. ft.) was the result. Similarly, number for parking spaces discussed were as high as 200, but ended up being 90 parking spaces in the new rule.</p> <p><i>Landfill/Excavation:</i> 1,000 cubic yards is about what can be moved in two days.</p> <p>6/12 Staff explained the difficulty in determining the specific reasons for the Advisory Committee's rationale. This Committee discussed the threshold exemption levels over roughly a six month period, and included input from cities, counties, tribes, agricultural interests, the business community, plus other interests. These threshold levels were a compromise to a range numbers which ultimately resulted in two sets of levels, one for inside the urban growth area/boundary and one for outside the urban growth area/boundary.</p> <p>Staff is in the process of seeking further information from those involved with the Advisory Committee deliberations and will report orally to the Commission of any results at the June 19th study session.</p> <p>6/19 Staff presented some additional findings from members of the SEPA Advisory Committee and Department of Ecology with respect to the commercial exemption threshold. This information confirmed that the</p>	

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	<p>numbers were a compromise of differing recommendations.</p> <p><u>Public Comments</u></p> <p><u>PC Discussion</u> The Commission discussed the information provided by staff regarding the SEPA Advisory Group’s rationale. In particular, Commissioner Miller took issue with the proposed exemption size (30,000 sq. ft.) for commercial developments. Although there is a balance between staff efficiencies and oversight, there is still some concern over this number. Commission Miller asked for yet further clarification from DOE.</p> <p>6/19 The Commission generally understood the threshold levels represent a compromise from the different interests represented on the Advisory Committee. The discussion looped back to the legislative mandate and the desire to provide predictability, consistency and streamline review. Commission Miller expressed concern over the seemingly arbitrary numbers established by the Rule based on Advisory Committee input.</p>	
<p>3. What would we have in place (such as regulations) if we didn’t use SEPA? (Biethan, Miller, Murray)</p>	<p><u>PC Preliminary Direction</u> Commissioners raised the question of what would the City use in absence of SEPA. An example given was a 90-space parking lot and if we don’t use SEPA to address impacts, what do we use?</p> <p><u>Staff Recommendation & Reasoning</u> The City has regulations in place through the zoning code, stormwater technical notebook, and other documents to address development impacts. Table 3 of the Technical Committee Report to the Planning Commission outlines each category on the SEPA checklist and corresponding city regulations. The example above, a 90-space parking lot, would be subject to these code requirements, specifically the critical areas regulations, tree preservation regulations, landscaping and lighting standards, stormwater management code and technical notebook, and other citywide regulations, to name a few.</p> <p><u>Public Comments</u></p> <p><u>PC Discussion</u> The Commission was satisfied with staff’s response.</p>	<p>5/22 Open 6/12 CLOSED</p>

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<p>4. What are we losing by not having a SEPA checklist? In other words, how does this change impact our desire to mitigate? (Murray) Will this information still be accessible? (O’Hara)</p>	<p><u>PC Preliminary Direction</u> Is the City losing any ability to review and mitigate development projects if we do not use SEPA’s substantive authority?</p> <p><u>Staff Recommendation & Reasoning</u> SEPA, as a tool for Redmond, is not as necessary as it was during its inception. This is due to the fact that the City has a very comprehensive set of development regulations in the Zoning Code, plus enforcement through the Municipal Code as well as Technical Notebooks. Increasing the threshold levels does not necessarily change our desire or ability to mitigate.</p> <p>(6/12) Staff suggested that administrative processes will be modified to require SEPA checklists on all land use development applications, regardless of whether or not a project would otherwise be exempt from SEPA. This checklist will become part of the project file and accessible to anyone wishing to view the official file.</p> <p><u>Public Comments</u> The Commission received testimony stating that the SEPA checklist provides a comprehensive disclosure of information in one location and that it provides value to those wishing to review the land use application.</p> <p><u>PC Discussion</u> The Commission discussed the merits of the public testimony and the value of data accessibility. It appeared to be general consensus that having the ability to view the SEPA checklist for a land use application would be beneficial and provide one central repository for environmental information.</p>	<p>5/22 Open 6/19 CLOSED</p>