



TECHNICAL COMMITTEE REPORT TO THE PLANNING COMMISSION

To: Planning Commission

From: Technical Committee

Staff Contacts: Rob Odle, Planning Director, 425-556-2417
Lori Peckol, AICP, Policy Planning Manager, 425-556-2411
Jason Rogers, Senior Planner, 425-556-2414

Date: November 23, 2016

Project File Number: LAND-2016-01990

Project Name: Amendment to Comprehensive Plan Capital Facilities Element
Regarding Emergency Preparedness

Related File Numbers: SEPA-2016-01991

Applicant: City of Redmond.

Applicant's Contact: Jason Rogers, Senior Planner

**Reason the Proposal
Should be Adopted:** The Technical Committee recommends approving the amendment to the Redmond Comprehensive Plan because:

- The proposal is consistent with the Redmond Comprehensive Plan, because it will provide for consideration of emergency preparedness needs when updating functional and strategic plans; and
- The proposal will ensure emergency preparedness needs are reflected in the Comprehensive Plan including appropriate terminology.

I. APPLICANT PROPOSAL

The applicant proposes to amend the Capital Facilities Element to revise policy CF-1 to more clearly highlight emergency preparedness and add a new policy CF-2.5 to directly

address emergency preparedness when considering functional plan amendments or updates.

II. RECOMMENDATION

The Technical Committee recommends that the Capital Facilities Element of the Comprehensive Plan be amended to include:

- A. Revisions to policy CF-1 to separate fire protection and response from emergency management; and
- B. A new policy CF-2.5 which addresses integration of emergency preparedness with functional and strategic planning as applicable.

Exhibit A shows the Technical Committee recommended amendments.

III. BACKGROUND, FACTORS CONSIDERED, AND ALTERNATIVES

A. BACKGROUND AND REASON FOR THE PROPOSAL

The City's Comprehensive Emergency Management Plan (CEMP) was last updated in 2015. The CEMP is a strategic plan which provides the framework for city-wide mitigation, preparedness, response, and recovery activities for all types of hazards. The CEMP is prepared in conjunction with other jurisdictions in the region to ensure that plans prepared by cities, counties, the state, and federal agencies (primarily the Federal Emergency Management Agency [FEMA]) work in concert to address emergency preparedness and response.

In conjunction with this update, a Comprehensive Plan amendment was docketed to "expand on the direction of policies...which call generally for hazard mitigation and disaster preparedness planning, but do not use language common in those fields and do not identify existing City planning efforts or documents." While the Comprehensive Plan contains policies in support of emergency preparedness, notably in the Transportation and Natural Environment Elements, policy direction for other functional areas is not currently addressed by the Comprehensive Plan. In addition, some important elements of the updated CEMP can be best addressed through integration with functional or strategic planning as they entail ensuring infrastructure and facilities are appropriately designed and equipped to be resilient and prepared for emergency conditions.

The major areas of emphasis in the Comprehensive Emergency Management Plan include:

- Alternative Service Centers
- Safe-to-fail mechanisms
- Resilient transportation networks
- Flood Tolerant Community
- Business outreach

- (Citizen) Outreach activities

In addition to these areas of emphasis, emergency preparedness and management uses technical terms and other language which is not necessarily consistent with current Comprehensive Plan language. For example, “Alternative Service Centers” in this context refers to facilities for provision of services in the event primary facilities are incapacitated, or facilities to provide services in a more distributed fashion; in an emergency situation, it may be desirable to provide certain services from alternative, rather than primary, facilities for logistical or other reasons.

B. ANALYSIS

Staff analyzed current Comprehensive Plan policies and language to identify potential changes in the process of developing the recommended amendments as summarized below.

1. Alternative Service Centers

This specific technical term is contained in a recommendation in the CEMP: “To ensure provision of vital services following a hazard event, Redmond will develop alternative service centers in less hazardous areas.” Redmond has recently taken actions to implement this recommendation including the siting of Fire Station 17 in North Redmond, away from the downtown area liquefaction zone. However providing services in the hazard situation can include various activities ranging from distribution of food and water to debris cleanup to incident command. Planning for Alternative Service Centers is not well-defined by current Comprehensive Plan or Functional Plan policies, and the Technical Committee recommends that this concept should be included in the policies.

2. Safe-to-fail mechanisms

“Safe-to-fail” in this context refers to resiliency, or having facilities and equipment that are designed to function in the event of a failure of a primary service. Examples include having a robust communication network, backup power generation, and seismic retrofits of structures. While these items are acknowledged in general terms in the Comprehensive Plan, an emphasis on these items for functional and strategic planning is important to ensure appropriate emergency preparedness and response. Therefore a portion of the new recommended policy calls for this.

3. Resilient transportation network

Policy TF-38 reads: “Protect Redmond’s transportation system against disasters by maintaining prevention and recovery strategies that are coordinated locally and regionally.” The Technical Committee believes the Comprehensive Plan appropriately addresses this issue and does not recommend a change.

4. Flood Tolerant Community

Policies NE-45 through NE-50 address flood tolerance and resilience. The Technical Committee believes the Comprehensive Plan appropriately addresses this issue and does not recommend a change.

5. Outreach activities for citizens and businesses

The Comprehensive Emergency Management Plan calls for ongoing outreach to both citizens and businesses to promote emergency preparedness and resiliency if/when a disaster occurs. Redmond currently has programs to accomplish this including Redmond Ready and the Community Emergency Response Team (CERT) program. Comprehensive Plan policy PI-5 provides general guidance for public involvement, particularly for Comprehensive Plan amendments and significant implementation actions. This policy calls for respecting the diversity of the Redmond community, using a wide variety of outreach methods, using community groups, providing clear and timely communication, and promoting mutual understanding. While this policy is particularly intended for Comprehensive Plan amendments and significant implementation actions, several of these concepts provide useful guidance for outreach for emergency preparedness also. The Technical Committee does not believe a policy amendment is necessary to address this area.

C. ALTERNATIVES

1. No change. Not amending the Comprehensive Plan and maintaining the current policies would mean the Comprehensive Plan does not as fully provide for appropriate consideration of emergency preparedness with functional and strategic planning.

IV. ADDITIONAL SUPPORTING ANALYSIS

A. COMPLIANCE WITH CRITERIA FOR AMENDMENTS

Redmond Comprehensive Plan Policy PI-16 directs the City to take several considerations, as applicable, into account as part of decisions on proposed amendments to the Comprehensive Plan.

The following is an analysis of how this proposal complies with the requirements for amendments.

1. **Consistency with Growth Management Act (GMA), State of Washington Department of Commerce Procedural Criteria, VISION 2040 or its successor, and the King County Countywide Planning Policies.**

Integrating emergency preparedness planning with functional and strategic planning supports GMA planning goals including to promote urban growth

through appropriate provision of public facility and services, support economic development, and encouraging efficient transportation systems. VISION 2040 and King County Countywide Planning Policies also emphasize resiliency for transportation systems and disaster planning. The King County Countywide Planning Policies policy T-16 states: “Protect the transportation system (e.g. roadway, rail, transit, air, and marine) against major disruptions by developing prevention and recovery strategies and by coordinating disaster response plans.”

2. **Consistency with Redmond’s Comprehensive Plan, including the following sections as applicable:**
 - a. **Consistency with the goals contained in the Goals, Vision and Framework Policy Element.**

One of the eight goals for Redmond contained in the Goals, Vision and Framework Policy Element is “To cultivate a well-connected community, working together and with others in the region to implement a common vision for Redmond’s sustainable future.” The proposed amendments support this goal and others generally by providing for the resiliency of the community.
 - b. **Consistency with the preferred land use pattern as described in the Land Use Element.**

The proposed amendment is consistent with the preferred land use pattern by calling for consideration of emergency preparedness in functional and strategic planning.
 - c. **Consistency with Redmond’s community character objectives as described in the Community Character/Historic Preservation Element or elsewhere in the Comprehensive Plan.**

The proposed amendment is consistent with policy CC-19, which reads “Design and build Redmond’s public buildings in a superior way and with high-quality materials to serve as innovative and sustainable models to the community.”
 - d. **Consistency with other sections including the Transportation Element as applicable.**

Policy TR-38 is directly applicable and reads “Protect Redmond’s transportation system against disasters by maintaining prevention and recovery strategies that are coordinated locally and regionally.” The proposed amendment would provide for additional consideration of emergency preparedness when updating functional plans.
3. **Potential general impacts to the natural environment, such as impacts to critical areas and other natural resources, including whether development will be directed away from environmentally critical areas and other natural resources.**

The proposed amendment is not likely to impact the natural environment including impacts to critical areas and other natural resources.

4. **Potential general impacts to the capacity of public facilities and services. For land use related amendments, whether public facilities and services can be provided cost-effectively and adequately at the proposed density/intensity.**

The proposed amendment could impact public facilities depending on how it is implemented. Siting capital facilities involves consideration of many factors, and adding emergency preparedness as a consideration, such as locating a facility outside of a liquefaction zone, may affect facility siting. However the proposed amendment would not affect the capacity of public facilities, and would provide for some capacity to be useful in an emergency situation.

5. **Potential general economic impacts, such as impacts for business, residents, property owners, or City Government.**

The proposed amendment is intended to address emergency preparedness and would not have general economic impacts. The amendments are intended to increase the City's ability to respond to and withstand emergency events and situations.

6. **For issues that have been considered within the last four annual updates, whether there has been a change in circumstances that makes the proposed amendment appropriate or whether the amendment is needed to remedy a mistake.**

The amendment has not been considered within the last four annual updates, nor has there been a change in circumstances.

V. AUTHORITY AND ENVIRONMENTAL, PUBLIC AND AGENCY REVIEW

A. AMENDMENT PROCESS

RZC Sections 21.76.070.AE and 21.76.050.K require that amendments to the Comprehensive Plan or Zoning Code (except zoning map amendments consistent with the Comprehensive Plan) be reviewed under the Type VI process. Under this process, the Planning Commission conducts a study session(s), an open record hearing(s) on the proposed amendment, and makes a recommendation to the City Council. The City Council is the decision-making body for this process.

B. SUBJECT MATTER JURISDICTION

The Redmond Planning Commission and the Redmond City Council have subject matter jurisdiction to hear and decide whether to adopt the proposed amendment.

C. WASHINGTON STATE ENVIRONMENTAL POLICY ACT (SEPA)

A Determination of Non-Significance and SEPA Checklist are expected to be issued for this non-project action on November 30, 2016.

D. 60-DAY STATE AGENCY REVIEW

State agencies will be sent 60-day notice of this proposed amendment no later than November 30, 2016.

E. PUBLIC INVOLVEMENT

The public has opportunities to comment on the proposed amendment through the Planning Commission review process and public hearing which will be held on December 14, 2016. Public notice of the public hearing was published in the Seattle Times on November 23, 2016.

F. APPEALS

RZC 21.76.070.J identifies Comprehensive Plan Amendments as a Type VI permit. Final action is by the City Council. The action of the City Council on a Type VI proposal may be appealed by filing a petition with the Growth Management Hearing Board pursuant to applicable requirements.

VI. LIST OF EXHIBITS

- Exhibit A: Recommended Amendment to the Capital Facilities Element
- Exhibit B: Key Related Comprehensive Plan Policies
- Exhibit C: SEPA Threshold Determination – to be provided

Conclusion in Support of Recommendation: The Technical Committee has found the proposal to be in compliance with the Redmond Zoning Code, Redmond Comprehensive Plan, Redmond Municipal Code, and State Environmental Policy Act (SEPA).


ROBERT G. ODLE,
Planning Director
Planning and Community Development
Department


LINDA DE BOLDT,
Director of Public Works
Public Works Department