



January 11, 2018

Senator Dean Takko, Chair; Senator Guy Palumbo, Vice Chair; Senator Shelly Short; Senator Jan Angel, and Senator Marko Liias
Senate Committee on Local Government, Washington State Legislature

The Washington State Chapter of the American Planning Association (APA Washington) respectfully submits comments on **Senate Bill 6077 concerning minimum density standards for comprehensive plans adopted by cities required to plan under chapter 36.70A RCW. (SB 6077).**

APA Washington is a 1,400 member association of public and private sector professional planners, planning commissioners and elected officials, among others. We believe among the strengths of Washington's planning and community design approach over the past 25 years is a hallmark of local flexibility and diversity coupled with an established process of fair and collaborative growth allocation among the counties and cities throughout the state. We offer the following concerns about SB 6077:

- The bill creates a specific legislative benchmark, of six dwelling units per acre for residential areas, for the established requirement in the Growth Management Act that all urban growth areas "shall permit urban densities" (RCW 36.70A.110). However this one-size-fits all approach neglects established infrastructure planning, the variety of established urban development patterns throughout the state, local conditions such as large-scale, complex, high rank value critical areas that may call for protection beyond critical areas regulations, and situations such as small towns that were long ago developed without adequate wastewater systems to support infill development and will not have the ability to build such systems in the near future.
- This bill leaves some important aspects unclear. Would this minimum residential density apply to all lands that permit residential (e.g. some industrial zones permit housing) or only those that are exclusively residential? Is the six units per acre gross, or net of critical areas and other unbuildable portions of a development site? Would new provision require local jurisdictions to permit six units per acre "by right", or could a jurisdiction require bonuses, such as affordable housing set-asides or the purchase of transfer of development rights credits.

Despite these concerns, APA Washington appreciates the intent of supporting more efficient use of urban land within the state and increasing opportunities for housing infill and redevelopment, and is open to legislation that would strengthen the Growth Management Act's requirement that all urban growth areas "permit urban densities".

Thank you for your consideration.

Sincerely,

Rick Sepler, AICP
President, Washington Chapter of the American Planning Association