



MEMORANDUM

TO: Planning Policy Commission
FROM: Minnie Dhaliwal, CPD Director
RE: Title 18 Update – IMC 18.300 Subdivisions
DATE: May 12, 2022

Meeting Purpose

The purpose of the May 12th, 2022, Plan Planning Policy Commission (PPC) meeting is to seek comments and feedback pertaining to IMC 18.300 Subdivisions.

Background

The Council Ad Hoc Committee's Title 18 Update Desired Goals and Outcome document identifies the following priority relevant to this topic:

Goal 13: *Modernize code and incorporate best practices.*

Desired Outcome: Create a well-organized, clear code that improves public access to information; provides tools that address community needs; and helps create the kinds of places the community expects.

This Goal includes an action item to create well-designed subdivisions and provide guidance on the relationship between the street and the public realm.

The packet includes a summary of substantial changes in Attachment A, that focus on improvements to organization of code, process or implementation of direction from the Administration or the Commission; but are actions that do not warrant discussion with the Commission. The following Analysis includes the additional information to help the Commission's discussion of the policy questions posed for this section of code.

Analysis

Policy Questions for Planning Policy Commission:

Question 1: Do the proposed design requirement for plat layout including block length requirements for subdivisions adequately address the community's desired goals of well-designed subdivisions? Specific criteria from the draft code are included below for easy reference.

18.340.030 Preliminary Plat

B. Provides cohesive and connected circulation within and beyond the plat, including access to a public road for each lot. The residential neighborhood pattern is generally designed in a grid based on the following guidelines:

- 1. New streets are connected and contiguous to encourage compact and walkable neighborhoods and connections between neighborhoods. Cul-de-sacs or street-ends are discouraged. A future connection to adjacent public street or non-motorized through access is encouraged.*
- 2. Block lengths do not exceed 250 feet in any dimension or 1,600 feet in perimeter.*
- 3. New streets connect to existing street stubs on adjacent property.*
- 4. All new lots are designed to face the primary street frontage; and*
- 5. Lots accessed from an alleyway by vehicle are preferred over lots that have driveways on the public street. If existing alleys are adjacent to the subdivision, these alleys must be extended and used for vehicle and driveway access.*

C. Design Requirements

- 1. All lots must meet minimum lot size requirements for the property as established by this Title, and the lot arrangement and orientation of the homes should all complement the lot arrangement and orientation of the existing neighborhood.;*
- 2. The placement and orientation of lots and homes should consider privacy, solar orientation, access, location and access to open space and natural spaces that can contribute to the overall livability of the home and its relationship to the surrounding environment.*
- 3. The plat layout shall meet the design principles of IMC Terrain Management Chapter to respect the natural features including topography and critical areas. The plat must be designed to preserve and enhance as many of these valuable features as possible and comply with IMC Tree Chapter.*
- 3. Native Growth Protection Areas (NGPAs) shall be created and dedicated as an easement where the preservation of native vegetation is reasonably necessary to control surface water and erosion, maintain slope stability, provide visual and aural buffering, protect plant and animal habitat, or otherwise protect critical areas. The NGPE shall require all present and future owners of the NGPA area to leave undisturbed all trees and other vegetation within the NGPA, except with the express written permission of the City of Issaquah.*

4. *Zero lot line, shared access lots and alley access lots are encouraged. See Chapter 18.850 IMC for additional standards related to these lots.*

Question 2: Are any changes desired to the code section 18.350 on zero lot line, shared access lots and alley access lots? This is a new section added to provide additional options for efficient use of land.

Question 3: Should the open/recreation space standards be the same for multifamily vs single family short plat/subdivision?

The “Natural Amenity Space” requirements under the Community Space Chapter that was reviewed at an earlier PPC meeting listed a requirement of 48 sq. ft. per residence, which is more appropriate for multi-family development. The existing code does not have an open space requirement for plats. If an open space requirement for plats is desired, then staff will do additional research and provide a recommendation in the second draft.

Question 4: Should the threshold of short plats increase from 4 lots to 9 lots?

Under the existing code a four-lot plat is considered a short plat that is approved administratively and anything more than four lots is considered a subdivision that is approved by a hearing examiner. The state law was changed a few years ago to allow up to 9 lots under the short plat process. PPC’s previous discussion on thresholds for environmental review (SEPA) was to keep the threshold at 4 residential units. For example, a five-lot short plat currently requires SEPA (public notice required) and a subdivision process (preliminary plat approval by the hearing examiner after a public hearing and a final plat approval after another hearing). If the commission wants to streamline the process, then the short plat threshold could be increased to 9 lots where it will still require going through SEPA review with public notice but the plat could be approved administratively.

Previous Meetings

- June 24, 2021 – Planning Policy Commission: Subdivisions, ([agenda/](#) [Minutes/](#)[Video](#))

Things to Consider: Policy Discussion

PPC could give additional thought to the following topics in their review of the Discussion Draft:

- Do the proposed design requirement for plat layout including block length requirements for subdivisions adequately address the community’s desired goals of well-designed subdivisions?
- Are any changes desired to the code section 18.350 on zero lot line, shared access lots and alley access lots?
- Should the open/recreation space standards be the same for multifamily vs single family short plat/subdivision?

- Should the threshold of short plats increase from 4 lots to 9 lots?
- Do the proposed changes adequately address the goals and outcomes identified by Council?

Timeline

- May 12th, 2022 – Public Hearing: IMC 18.300 Subdivisions, IMC 18.400 Zones, IMC 18.402 Permitted Uses, IMC 18.404 Form and Intensity, and IMC 18.500 Land Use Standards.
- May 26th, 2022 – Deliberation: Title 18 – IMC 18.400 IMC 18.300 Subdivisions, IMC 18.400 Zones, IMC 18.402 Permitted Uses, IMC 18.404 Form and Intensity, and IMC 18.500 Land Use Standards
- September 2022 – Public Hearings: Consolidated Draft Title 18 Update

Attachments

- A. Summary of Substantive Changes
- B. Summary of Public Comments

A. Summary of Changes for IMC 18.300 Subdivisions

The following summarizes the substantive changes made to develop the proposed **18.300 Subdivisions**. The changes are based on the gaps analysis, previous discussions with the Planning Policy Commission, a Staff evaluation of existing code and feedback from the City attorney’s office.

CHANGE	REASON
1. Update the code to make the subdivision process clearer and easier to follow.	Consistent with project goal 13, these improvements add clarity and easier use of city regulations.
2. Add subdivision design standards that guide how new subdivisions incorporate such features as: circulation through the community, street design, lot design, placement of lot elements (building, open space, utilities, access, etc.). Standards for garage orientation and relationships to the street and public realm are included in the Buildings and Site and Urban Design Chapters of Part 6 Development Standards.	There are currently no design standards for new subdivisions such as street connectivity, block size, designing with the topography, open space requirements. Additionally, opportunities for efficient use of land such as design standards for zero lot line and shared access did not exist. This draft proposes design standards.
3. Add a unit lot subdivision process as an alternative form of platting.	Unit lot subdivision is used to create attached townhomes that can be sold as fee simple lots. The existing code did not have this option.
4. Streamline the subdivision process in general by making standards easier to see and understand, removing redundant information.	To add clarity for everyone-community members, developers, and staff.
5. Add specific review criteria for different types of subdivisions (i.e. short plat, preliminary plat, lot line adjustment, etc.)	Approval criteria was not clear or was missing from the code. The proposed draft provides clear criteria to evaluate an application.
6. Add Lot Consolidations a new process, with an identical process as Lot Line Adjustments.	The existing code does not have a process for lot consolidation where two or more lots can be merged.
7. Incorporate subdivision standards from the Talus and Issaquah Highlands into single citywide subdivision code, while retaining unique features of the urban villages.	Removes duplication and consolidates these chapters with the rest of the code.

<p>8. Add a table to clarify when subdivisions expire, how and when they can be extended. Add text to clarify what steps are needed to amend approved subdivisions.</p>	<p>Instead of unlimited extensions, a term limit of 3 one-year extensions added. This allows a preliminary plat approval of maximum of 8 years (with 3 extensions) to get final approval.</p>
<p>9. Added a new consolidated section on bonding and deferred improvement and added new limits to the range of infrastructure that can be bonded for.</p>	<p>Language added to make it clear that all infrastructure (roads, utilities etc) are required to be built before final plat approval and bonding is for minor items such as final lift for roadways.</p>
<p>10. Added a new consolidated subdivision modification section, based on the existing language for short plats, that is applicable to all subdivisions</p>	<p>The existing code does not have a modification process for preliminary plats.</p>
<p>11. Add a section discussing subdivision phasing, when phases can be extended, and which regulations will be applied to future phases, i.e. vesting.</p>	<p>The existing code does not have a phasing section.</p>
<p>12. Change the decisionmaker for final plats from the Hearings Examiner to an administrative decision in the Process and Procedures Chapter</p>	<p>State Law was changed to allow administrative approval of final plats.</p>

B. Summary of Public Comments

Date	Commentor Name	Topic	Comment	Response Notes
6/23/2021	Susan Neville	Subdivision	<p>What is a subdivision? What are some subdivisions in Issaquah? Is Talus subdivision or was it built under a Development Agreement? What is the longest and most expensive subdivision issue planners currently deal with? Is changing short plat from 4 to 9 a state law? Can changing short plat process from 4 to 9 lots influence building on the forested foothills?</p>	<p>A subdivision is any change to lot lines or lot configuration, including dividing lots, moving lot lines, or combining lots. Talus was built under Development Agreement but did include a subdivision process. There are also many smaller subdivisions that occur throughout the City each year. State Law allows short plats up to 9 lots, but this draft code did not adopt this higher threshold. The short plat process applies to creation of 4 or fewer lots.</p>
6/24/2021	Connie Marsh	Subdivision	<p>Hearing examiner should make final plat approval because the City needs a fresh eye to review applications and be sure something isn't being overlooked or dropped</p>	<p>The decision for preliminary plat approval, which comes before the final plat and includes all the subdivision details and plans, is a Hearing Examiner decision. Majority of public input and staff review occurs at this stage. After the preliminary approval the applicant obtains construction permits which are approved administratively. Once all the roads and utilities are built, the final approval is granted. Final plat approval involves verification that all conditions of preliminary approval have been met. Recent changes to the State Law allow administrative approval of final plats. Therefore, administration is recommending hearing examiner approval of preliminary plat and administrative approval of final plat.</p>

6/24/2021	Master Builder Association	Subdivision	Raise the threshold for short plats from 4 lots to 9 lots, include unit lot subdivisions, administrative approval of final plats.	The threshold for short plats was not raised with this update based on previous discussion with PPC, unit lot subdivision process added, and administrative approval of short plat will be included in the Process and Procedures section.
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