Kristen Holdsworth

Hi, this is Kristen Holdsworth. I work for the City of Kent and am providing comments on their behalf. We''ll provide written comments as well. I did want to voice procedurally. We have some concerns about including directly regulations for critical areas in an SMP versus incorporation by reference. Best practices for code writing and development is to not have overlapping repeated efforts because if you have slight word changes, it can put us in a long process of legal conundrums where lawyers interpret because there''s a slight wording difference and one versus the other that they must mean two very separate things. We are seeing this right now with a lot of the state legislation that''s happening around housing, most recently with parking, but then also with other subdivision laws as well. And so just would like to caution and really question what the purpose of having regulations in two places could be and what problem we''re trying to solve there.

And then the second is just the unintended consequences of when critical areas regulations have their periodic update versus an SMP update and what happens in those off years or those gap years and just have a lot of procedural questions about what that could entail for some inconsistencies there. Are we now asking us to really update both of those programs every five years?

So we''ll provide more written comments on some of our concerns, especially as they relate to housing affordability and layering on of regulations. But we will save those for the letter. Thank you so much for hosting this webinar and the hearing as well.