



City of Seattle

Seattle Planning Commission

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February 7, 2013

Honorable Councilmember Richard Conlin, Chair
Seattle City Council, Planning, Land Use and Sustainability Committee
PO Box 34025
Seattle, WA 98124-4025

RE: Recommendations for 2012-2013 Comprehensive Plan Amendments

Dear Councilmember Conlin,

The Seattle Planning Commission (SPC) is pleased to provide you with our comments and recommendations on the proposed 2012-2013 Comprehensive Plan (Comp Plan) amendments. Our recommendations are based on our responsibility as stewards of the *Seattle Comprehensive Plan* and made in consideration of the major update process currently underway as mandated by Washington state law.

Current Approach to the Major Update Is Not Working

Last year, Council adopted [Resolution 31370](#), which calls for a phased approach to the required major update of the Comp Plan. The update is intended to realign the City's goals and policies to meet new and significant changes. As noted in the resolution, four of the proposed amendments on this year's docket – those related to Climate Action, Urban Design, Healthy Food, and Transit Communities – represent Phase One of the major update.

In reviewing these and the other amendments, we have found the phased approach not only ineffective but actually counterproductive to achieving an important objective of the update: "... (to) increase clarity, remove redundancy and ensure relevance to the purpose of the Comprehensive Plan" as outlined in section three of the resolution.

While we believe DPD staff has done their best with the limited resources, the resources and leadership provided for the phased approach are inadequate to the task and will likely result in the need to re-visit and re-do much of what is being adopted in Phase One. DPD leadership has acknowledged the incremental approach will result in a missed opportunity to make the fundamental changes to the Comp Plan initially envisioned. We concur with DPD's assessment, and further believe the current piecemeal approach is creating additional conflicts in the Comp Plan between different elements and sections. It neither establishes a reasonable method or plan for resolving these conflicts nor provides funds and resources to resolve them. Frankly put, the phased approach will simply result in a longer and more convoluted Comp Plan that lacks guidance and clear directives for our city's future. **We strongly encourage and support Council to work with the Mayor and reconsider the phased approach to the major update and to provide resources and staff for a more appropriate approach to overhauling this vital policy framework that guides the future of our city.**

As the stewards of the Comp Plan, we believe there is great value in creating a more cogent, streamlined Comprehensive Plan for Seattle. The Comp Plan sets the vision and establishes the framework policies for many city goals. It should provide forward looking direction that will result in clear implementation through city plans, regulations, codes, and investments. Policies and goals are most effective when they are direct and outcome-oriented. Unfortunately, new amendments are adopted without a critical analysis as to how they fit into the document as a whole. The result is that the Seattle Comp Plan is on a trajectory to become all things to all people and thereby impotent in outlining distinct policy directions. Rather than providing a clear vision for our future, the Comp Plan is simply becoming a parking lot for good intentions.

As you read through our recommendations below, please keep in mind that it is through this critical lens that we have reviewed the proposed amendments. Our goal is to add only that content which does not conflict with or contradict existing policy and to ensure that content is as clear and concise as possible, with little ambiguity in language or nuance. We also encourage strengthening the connections between different elements and the functional plans which we find more appropriate for timely strategies, detailed policies, and numerical targets.

RECOMMENDATIONS ON PROPOSED AMENDMENTS

A. Climate Action

Commission Recommendation & Comments: **Adopt with revisions and an explicit commitment to future work**

We have worked closely with staff at the Office of Sustainability and the Environment throughout the Climate Action Plan update process and appreciate the interdepartmental effort and public outreach that has occurred to date.

We conclude that in this instance most of the goals and policies proposed for the Comp Plan are additive and miss an opportunity to clearly shift and signal a change in policy direction. Certain goals and policies that remain embedded in the Comp Plan may be contradictory to the aspirations and policy direction that will truly address climate action. Without removing or amending the outmoded policies, the city's response to climate change will be impeded; a policy framework rife with contradictions will only hinder the City's efforts.

With that said, we suggest a two-tiered approach for moving forward: (1) Include revisions that strengthen and clarify these important goals and policies, (2) perform additional work in subsequent phases to better address contradictory goals and policies. Below are examples of initial recommended revisions to the proposed Climate Action language:

As Proposed in the Urban Village Element

- Discussion (*paragraph four, first two sentences*): *“In addition to these centers and villages, this Element of the Plan puts further emphasis on transit communities – those areas within easy walking distance of frequent transit service. Most transit communities overlap with the geographic areas of urban villages, and the presence of frequent and reliable transit service reinforces the intended function of the urban villages by providing viable mobility options ~~an alternative way~~ for residents and employees ~~to travel~~.”* In addition, better clarify and connect this policy by referencing the new section C-6 of the Land Use Element which defines the City's approach to

transit communities. Specify that transit nodes, independent of mode, focus on the quality and frequency of service that makes a transit community.

As Proposed in the Environment Element

- The discussion section should be condensed.
- Add language about adaptive management; establish the connection between transportation, GHG emissions, and land use.
- We suggest the following modifications to proposed goal EG7.5.; ~~Be Prepared~~ *for and adapt to the effects of climate change through the development, ongoing assessment, and implementation of a Climate Action Plan.*
- Create stronger linkages to the functional plan by referencing the development/implementation of a Climate Action Plan as well as the chart included in the Comp Plan of 2020 and 2030 GHG emission reduction targets by sector.
- As the Commission has recommended on many previous occasions, we generally oppose the use of specific numerical targets, particularly those which are not inherently measurable, in the Comp Plan. Functional plans generally provide a better place for articulating specific numerical goals because such plans are updated and tracked more regularly and are typically prepared based on the extensive technical analysis needed to quantify measurable goals. We recommend the inclusion of the proposed targets in the more detailed and current Climate Action Plan scheduled to be approved on April 22, 2013.
- The proposed policy E15.3 (*Continue to plan for transportation facilities at the same time as for land use as a way to reduce the dependence on the automobile*) represents another opportunity to make a direct connection back to the proposed Transit Communities policy.

B. Urban Design

Commission Recommendation & Comments: **Defer**

The Commission supports creating a new Urban Design element, which will provide clarity and guidance for the physical development of the city. DPD's draft background report, *Urban Design Seattle*, provides valuable information and analysis. However, the proposed Comp Plan goals and policies seem too simplistic to provide meaningful direction, and are fraught with unintended negative consequences.

For example, proposed policy UD 4 states, "*Respect topography, water and natural systems in the built environment, such as by using development regulations or design to 'step up or down' hillsides to accommodate significant changes in elevation, or by siting tall buildings to accentuate the city's topography.*" While we believe this is a good general principle, for a Comp Plan policy with legal standing it is overly simplistic, does not consider specific context, and could be construed as giving priority to topography as a consideration in siting taller buildings when many other factors such as access to transit, jobs and housing goals, and historical context should also be factors. For example proposed policy UD23 states, *Allow taller buildings in key locations, such as close to light rail transit stations, to provide visual focus, and define activity centers.*

Further examples of the proposed policies about building height and urban form could be construed as contradictory or lack clear policy direction. Proposed policy UD24 states, “*Design tall buildings with setbacks to ensure sunlight to public streets, parks or open spaces and access to major public views or view corridors.*” This policy seems to contradict proposed policy UD26 which states, “*Reduce setbacks from the street while maintaining adequate sidewalk width for pedestrians, to encourage better scale relationships between horizontal width of streets and vertical walls of buildings.*” Furthermore we recognize that setbacks are just one way to provide more access to sunlight in tall buildings or to be applied for the purpose of creating a more pleasing pedestrian experience.

We are not even sure what UD21, “*Use building forms and height to enhance desirable city patterns,*” means because it lacks the context laid out in the background report related to the definition of “desirable city patterns.”

At first we tried to provide line-by-line changes; however, we soon came to conclude that there might be a better way of capturing the context, nuance, and other detail that is covered in the background report. We recommend deferring this element and develop a more appropriate way of including it in the Comp Plan as part of a comprehensive major update. We do not believe there are negative consequences if this adoption is delayed.

C. Healthy Food

Commission Recommendation & Comments: **Adopt with Revisions**

The Commission recognizes the importance of access to healthy food and agrees that, generally speaking, these policies are strategic insertions that are needed in the Comp Plan. We understand that these policies will likely be revisited and additional work must be done in subsequent phases to better address integration and to address potential redundancies. For now, we recommend the following small edits and revisions.

As Proposed in the Urban Village Element

- We suggest the following modifications to proposed goal UV10.5 *Encourage the location of grocery stores, farmers markets, and community food gardens to support access to healthful food for all areas of the city where people live, inside and outside of urban villages.* We question whether the Urban Village element is the appropriate location for this policy since it’s not related to distinguishing between areas inside and outside urban villages.

As Proposed in the Environment Element

- We suggest the following modifications to section D Aquatic Areas policies U12.5 ~~*Seek to Promote the reduction of the amount of pesticides, herbicides, and artificial fertilizers used for urban agriculture within the city.*~~ We also note that there are already regulations that support this policy so it should be strengthened. We also encourage the City to consider how this proposed policy can be made broader to include more than just urban agriculture or combine with U15.7 and/or whether it should be linked back to water quality directly.
- With regard to section E Climate Change policy U15.7, *Encourage local food production as a means to decrease the environmental and climate impacts of the food production and distribution systems,* we encourage the City to consider how this proposed policy can be combined with U12.5.

D. Transit Communities

Commission Recommendation & Comments: **Adopt with revisions, additions, and an explicit commitment to future work**

The final amendment submitted by DPD differs from the proposal submitted by the Commission on September 24, 2012. The Commission's original version included additional changes to the Capital Facilities, Urban Village, and Land Use elements.

Based on our recent stakeholder outreach that we outline in our soon to be released report to Council we recommend adopting the Commission's original concomitant changes to the Land Use, Urban Village, and Capital Facilities Elements which better integrate the citywide transit communities approach into the Comp Plan, address some key policies that may create barriers to its success and help to alleviate internal policy contradictions.

Also based on our recent community engagement efforts we support adopting the revisions outlined below to the proposed language of the new section C-6 as follows;

- **Ensure that equity is a central theme and goal of the citywide transit communities strategy by substituting stronger language;**

LUG 62-~~Opportunities for people to live and work in close proximity to transit and so they can easily access other daily needs such as healthy food, healthcare, child care, education, services, retail, good jobs and reliable utilities, thereby potentially lowering overall household costs. Provide opportunities for residents of transit communities to improve their overall affordability of living by ensuring that there is safe and convenient walking or transit access to employment, education, and goods and services to meet their daily needs.~~

LUG 63-~~Opportunities for a broad cross-section of socio-economic groups, ethnicities and household types to live and work in transit communities, especially current residents and businesses. Ensure equitable access to the transit system and preserve opportunities for a broad cross-section of socio-economic groups, ethnicities and household types to live and work in transit communities. Encourage targeted use of incentive zoning and other tools and resources to curb potential displacement of low income, special needs, immigrant / refugee populations, and culturally significant institutions or businesses due to price increases and development associated with new transit facilities.~~

- **Update additional goals presented in DPD's proposed version of C-6 to make them action oriented statements that are complete sentences;**

LUG 60 Create communities that are complete, compact, connected places within walking distance of reliable, frequent transit.

LUG 61 Prioritize investments and infrastructure in transit communities to take advantage of high concentrations of jobs and residents

LUG 65 Leverage efficient, frequent and reliable transit service by promoting land use policies that encourage activity that comes from closer proximity to jobs and residents.

- **Clarify the method and approach for identifying a transit community by revising proposed policies LU270 and LU71 as follows:**

LU270 Identify transit communities based on the following: the location of transit stations or stops, transit mode, frequency and span of transit services, the mix and intensity of use in the surrounding area, as well as proximity to activity-generating destinations. ~~pedestrian demand generators (including frequent and reliable transit service, existing or potential land use, social equity factors, and corridor function.~~

LU271 Identify the boundaries of a designated transit community as the area generally within a ten-minute walk or “walkshed” of a transit station or stop, accounting for the street network, topography, and physical barriers, and to take advantage of activity-generating destinations such as a major employer or institution, a neighborhood business district or major housing development. Consider walksheds when planning for areas near transit. Establish transit community boundaries that are generally within a ten-minute walk or “walkshed” of areas identified using the methodology outlined in LU270, accounting for the street network and topography. Work with communities to potentially include neighborhood destinations such as a major employer or institution, business district, or major housing development within the boundary of a transit community.

- **Further updates are needed as the Major Update Proceeds**

We anticipate additional changes to related Comprehensive Plan policies as the major update proceeds in order to further integrate the transit communities concept into other elements. We also expect changes to the city land use code and to capital facilities planning procedures will be needed as well as continued work on the methodology for identifying and designating transit communities.

We also note a typographical error in section 1D of the ordinance as proposed by DPD and recommend the following change: “Add a new section to the Land Use Element, as shown in Attachment D, *which describes an approach that would align zoning and encourage investments near frequent transit stops* ~~describing an approach to encouraging and investments near key transit stops.~~”

General Comments on Neighborhood Plan Element and Updates

Below we offer our comments on the two most recent updates included in the Neighborhood Plan Element. We generally support the adoption of both and offer small revisions and comments. We recognize that general problems within the Neighborhood Plan Element are also evident here, mostly related to redundant or vague policy language. A more holistic realignment and restructuring of the Comp Plan is needed to address issues related to the Neighborhood Plan Element and should be addressed in the Major Update.

Indeed, this element stands in stark contrast to other elements of the Comp Plan in two main ways: sheer size and repetitive language. Furthermore, we see an urgent need to clarify policy direction for our unique neighborhoods by prioritizing among strategies, being directive in our vision for each neighborhood, and in reconciling contradictions. For example, the Neighborhood Plan Element is 182 pages long. This is in sharp contrast to other essential and state-required elements such as the Economic Development Element (9 pages), the Housing Element (10 pages), or the Transportation Element (22 pages). A preliminary inventory of the Neighborhood Plan Element by a Commission taskforce found that a major reason for the length is that similar goals and policies are repeated throughout each of the 33 adopted neighborhood plans. The Commission has suggestions for how the City can restructure the Neighborhood Plan Element in a way that better highlights the goals and polices consistently across all neighborhoods while better focusing on the unique and authentic features in each adopted neighborhood plan.

E. Broadview-Bitter Lake-Haller Lake Neighborhood Plan

Commission Recommendation & Comments: **Adopt with revisions and an explicit commitment to future work updating the Neighborhood Plan Element**

The Commission supports the proposed changes and we commend the neighborhood planning team's sustained and successful outreach. We note that the proposed changes to the Future Land Use Map are particularly important and set the stage for implementing the broader changes recommended through the neighborhood planning process. We offer the following minor revisions (see line in/line out changes below) as well as comments and suggestions for bringing more clarity to the proposed goals and policies.

- The following goal is an example redundant language. In addition, with the possible exception of stormwater, the neighborhood plan would not be an effective way to coordinate larger infrastructure decisions such as sanitary sewer and drinking water. And finally, as written this goal lacks an action statement; a suggestion is provided as follows: *BL-G2 Implement environmentally sound sanitary sewer, storm water, and drinking water systems throughout Broadview, Bitter Lake and Haller Lake neighborhoods that are well-maintained and adequate to serve the current and ~~new~~future population.*
- As written this policy seems to prioritize storm water over accessibility; *BL-P4 Design sustainable drainage solutions that provide for ~~do not preclude~~ adequate sidewalks on both sides of streets and planned bicycle facilities.* If that was the intent then we recommend making the language more explicit.
- The phrasing in the following goal is not consistent with SDOT's usual definition of complete streets; *BL-G5 Develop a ~~A~~ comprehensive and safe network of "complete streets" (multi-modal) that support access and mobility for residents and business customers ~~in the Broadview, Bitter Lake and Haller Lake neighborhoods.~~* We recommend better clarifying the language with SDOT's other plans and policies.
- We find the phrasing of this policy to be confusing since pedestrian pathways are supposed to be part of a complete streets network. The way the policy is written it sound like pedestrian pathways are distinct from the complete streets network; *BL-P8 Develop funding sources to design, construct and maintain off-street pedestrian pathways that will link residents to the "complete streets" network and other community focal points, including schools and transit stops.*
- We recommend a minor edit to proposed policies BL-P9 as follows; *Work with the State, King County Metro, and the community to fund the design and construction of Aurora Ave. improvements to provide sidewalks and pedestrian crossings, frequent and fast transit, and adequate drainage.*
- We recommend a minor edit to proposed policies BL-P10 as follows; *Develop funding sources for the design and construction of the network of ~~bike~~ bicycle facilities recommended in the Bicycle Master Plan that will connect Bitter Lake, and Haller Lake residential neighborhoods with community destinations as well as regional trails and other nearby urban villages.*
- More generally, we recommend consolidating and combining policies BL –P 8-10.

F. Rainier Beach Neighborhood Plan

Commission Recommendation & Comments: **Adopt with revisions and an explicit commitment to future work updating the Neighborhood Plan Element**

The Commission supports the proposed changes and we commend the neighborhood planning team's sustained and successful outreach. We note that the proposed changes to the Future Land Use Map are particularly important and set the stage for implementing the broader changes recommended through the neighborhood planning process. We offer the following minor revisions as well as comments and suggestions for bringing more clarity to the proposed goals and policies.

- One outcome of the neighborhood update appears to be a recognition and reconciliation with the fact that Rainier Beach does not have one single town center, but instead various spots that concentrate economic activity, appeal to different cultural groups, serve as transit hubs, and more. However, there is contradictory language in the plan that refers to the "town center." We recommend reconciliation of the various goals and policies to reflect this unique characteristic of this neighborhood.
- We recommend an updated version of proposed goal RB-G2 as follows; *For Rainier Beach, the "town center" shall be comprised of the Historic Business District, Beach Square, Rose Street, and the Station Area. Together, these places reflect the complex culture, history, and identity of Rainier Beach as well as provide the goods and services this diverse area needs. For Rainier Beach, the "town center" is an interconnected and vibrant set of places where the community comes together. These places reflect the diverse cultures, histories and traditions that collectively give Rainier Beach its identity.* The prior language was more of a narrative that sets the context for policy.
- We recommend a minor edit to proposed policies RB-P4 as follows; *Seek to preserve the character of Rainier Beach's single-family zoned areas. Encourage residential small lot infill opportunities within single-family areas of the designated residential urban village. In the residential urban village west of Martin Luther King Jr. Way S., consider rezones of single-family zoned land to mixed-use designations.*

G. Container Port Discussion

Commission Recommendation & Comments: **Adopt**

The Commission supports this amendment, which was inadvertently omitted when the new Container Port element was adopted last year. We note that this element identifies that Seattle's container port is "vulnerable to changes in nearby land uses, traffic infrastructure and congestion, and larger economic conditions." In SPC's July 27, 2012 review of the proposed sports arena, the Commission cautioned that the proposed arena could exacerbate conversion pressure on surrounding uses and have potentially negative impacts on container port operations. We hope that the Port Access Study and DPD's zoning review of the area will strengthen protections for this important sector of the local and regional economy.

H. Recreational Boating Industry

Commission Recommendation & Comments: **Defer to major update**

The original proposal moved to amend three policies within the Economic Development element. DPD has recommend that just one of those policies, ED11, be adopted; the Commission recommends that all three be deferred and considered within a more thorough review of this element as part of the major update to the Comp Plan. We concur with DPD's analysis about the proposed amendments to this

element that have not been put forward into the legislation and suggest that it applies to the other two policies as well. The policy that DPD proposes addresses tourism within the retail core and historic districts that support this industry. The proposed addition recognizes a specific type of tourism, which would probably be better addressed in a separate policy that acknowledges various types of important tourism rather than singling out recreational boating. The major update would be a more appropriate time to consider these changes within the context of creating a richer and more robust Economic Development element befitting its important to our city's growth. We do not believe there are negative consequences if this adoption is delayed.

RECOMMENDATIONS ON REMAINING PROPOSALS

• **Funding Neighborhoods Directly to Prepare Neighborhood Plans**

Commission Recommendation & Comments: **Do not approve**

The Commission concurs with DPD's analysis. As we stated in our letter of June 20, 2012 regarding the proposals that should be included on the docket: "The proposed amendment would be better addressed as a budgetary decision."

• **Spectator Sports Facilities in Industrial Zones**

Commission Recommendation & Comments: **Do not approve**

While we concur with DPD's analysis, we note that the City will undertake other work in 2013, that will consider how to ensure that spectator sports facilities do not adversely impact industrial uses, particularly the container port industry. These include the Port Access Study, Freight Master Plan, and review of the Stadium Transition Area Overlay District. We hope that as part of the major update, the goals and policies within the Comp Plan will be clarified and any contradictions would be eliminated.

• **Pedestrian Grade Separation in Urban Centers**

Commission Recommendation & Comments: **Do not approve**

The Commission concurs with DPD's analysis.

Thank you for the opportunity to provide you with our recommendations regarding the 2012-2013 Comprehensive Plan amendments. Please contact me or our Director, Barbara Wilson, at (206) 684-0431 if you have further questions.

Sincerely,



David Cutler, Chair
Seattle Planning Commission

cc: Mayor Mike McGinn,
Seattle City Councilmembers
Darryl Smith, Ethan Raup, Alison Van Gorp; Mayor's Office
Diane Sugimura, Marshall Foster, Tom Hauger, Patrice Carroll, Kristian Kofoed ; Department of Planning and Development
Jill Simmons, Tracy Morgenstern, Christie Baumel, Sara Wysocki; Office of Sustainability and the Environment
Peter Hahn, Tracy Krawczyk, Kevin O'Neill; Seattle Department of Transportation
Bernie Matsuno; Department of Neighborhoods
Steve Johnson; Office of Economic Development
Rick Hooper, Office of Housing
Rebecca Herzfeld, Norm Schwab, Ketil Freeman, Peter Harris; Council Central Staff

SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURE & RECUSAL

- Commissioner Catherine Benotto disclosed that her firm, Weber Thompson, designs projects and advises clients on development projects throughout the city that could be affected by proposed Comp Plan changes.
- Commissioner Josh Brower disclosed that his firm, Veris Law Group PLLC, represents single and multifamily developers throughout the city and industrial businesses in the Ballard-Interbay-Northend Manufacturing & Industrial Center. **Commissioner Brower recused himself from the discussion of the proposal regarding the recreational boating industry.**
- Commissioner David Cutler disclosed that his firm, GGLO, designs projects and advises clients that may be impacted by amendments to the Comp Plan.
- Commissioner Colie Hough-Beck works at HBB Landscape Architecture and the Port of Seattle is a client of theirs. The amendments may affect the public and private project they work on throughout the city.
- Commissioner Mark Johnson disclosed that his firm, ESA, has the Port of Seattle and Sound Transit as clients that may be affected by some of the proposed amendments.
- Commissioner Bradley Khouri disclosed that his firm b9 architects, designs projects throughout the city of Seattle that may be affected by the proposed changes in the Comp Plan.
- Commissioner Jeanne Krikawa disclosed that her firm, The Underhill Company, is a consultant for Sound Transit.
- Commissioner Leslie Miller disclosed that she is the capital improvements chair of the Othello Park Alliance, recipient of a Large Matching Fund grant for work on Othello Park located in a potential transit community. OPA continues to apply for grant funding for work in this area.
- Commissioner Chris Persons disclosed that his firm, Capitol Hill Housing, develops affordable housing throughout the City and could be affected by the proposed changes in the Comp Plan.
- Commissioner Matt Roewe disclosed that his firm, Via Architecture, works on municipal planning and private development projects that could be affected by the proposed changes to the Comp Plan. **He abstained from the discussion of proposed amendment regarding the Rainier Beach neighborhood plan.**
- Commissioner Morgan Shook disclosed that his firm, BERK, works on municipal planning and private development projects that could be affected by the proposed changes to the Comp Plan.
- Commissioner Sarah Snider disclosed that her firm, LMN, does urban design and various types of architectural projects in the Seattle metropolitan area that could be affected by these amendments.