

Seattle Displacement Coalition

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May 14, 2010

City Clerk sent via email to: compplan@seattle.gov
600 Fourth Avenue Floor 3
PO Box 34025, Seattle, Washington
98124-4025

Re: Our Proposed Amendments to the Comprehensive Plan

To whom it may concern,

The Seattle Displacement Coalition is a 33 year old city-wide low income housing and homeless organization here in Seattle whose membership is made up of residents of Seattle and representatives of various church, community, and social service organizations within our community.

We are offering a set of proposed changes to the Comprehensive Plan and submitting on this date May 14 as prescribed in order to ensure consideration by the city.

In order our proposed amendments aimed at ensuring compliance with “concurrency requirements” contained in Growth Management Act. Specifically, these changes are proposed with the aim of ensuring that sufficient infrastructure and public facilities are either in place or fully funded and in the process of being put in place before additional growth and development is encouraged city-wide or planned for any specific area or neighborhood of the City.

We also are proposing changes that call for additional points and opportunities for citizen review and comment before the city makes adjustments to its 20 year growth targets in order to better understand the impacts of those changes and so that the community participation requirements accompanying GMA requirements are fully met.

We also have proposed another set of amendments in order to substantially improve the City’s longstanding commitments, goals, and policies calling for the preservation of existing low income housing stock. In order to better realize those legally codified goals and policies, we have offered changes designed to ensure 1 for 1 replacement of any existing low income housing that may be removed as a result of addition redevelopment in our neighborhoods, especially in areas around transit stations and in urban villages where plans are being made to accommodate increased densities and more market rate development.

We have attached the application as required and provided additional detail as to why our proposals meet the criteria for consideration in addition to the reasons we have stated above.

I. First here our recommend changes/amendments to the Comprehensive Plan designed to ensure concurrency requirements of GMA and that adequate infrastructure is in place before we add more growth into our communities.

Specific changes we are proposing for each section are to ensure consistency across each section and merely restate the objective of ensuring concurrency whether its with respect to land use, transportation planning, meeting growth targets, neighborhood planning policies etc etc.

Specific amendments we are proposing read as follows under this category (see changes highlighted in red):

1. In Urban Village Section (UV), add a new UVG17 new policy to read:

Analyze whether adequate infrastructure and public facilities are in place before adding land use capacity to any area, zone, or neighborhood of the city. Implement plans to raise density limits either for housing or other uses only when it can be shown that necessary additional infrastructure and public facilities either are in place or there is full funding and plans are underway to add them.

2. Amend UVG3 to read

Implement regional growth management strategies and the countywide centers concept through this Plan. Before implementing new strategies which seek to increase levels of growth in Seattle either in employment, housing, or population, make sure that new infrastructure needed to accommodate that growth is fully funded and in the process of being put in place.

3. Amend UVG6 to read:

Accommodate planned levels of household and employment growth. Depending on the characteristics of each area, establish concentrations of employment and housing at varying densities and with varying mixes of uses. Before increasing levels of household and employment growth, make sure that new infrastructure needed to accommodate that growth is fully funded and in the process of being put in place

4. Amend UVG10 to read:

Maximize the benefit of public investment in infrastructure and services, and deliver those services more equitably by focusing new infrastructure and services, as well as maintenance and improvements to existing infrastructure and services, in areas expecting to see additional growth, and by focusing growth in areas with sufficient infrastructure and services to support that growth. Discourage additional growth in areas where infrastructure is lacking and services are not there to support that growth.

5. Add an amendment to UV1 to read:

Promote the growth of urban villages as compact mixed-use neighborhoods in order to support walking and transit use, and to provide services and employment close to residences. Ensure adequate infrastructure is fully funded or in place before promoting more growth to these areas.

6. Add an amendment to UV2 to read:

Promote conditions that support healthy neighborhoods throughout the city, including those conducive to helping mixed-use urban village communities thrive, such as focused transportation demand management strategies, vital business districts, a range of housing choices, a range of park and open space facilities, and investment and reinvestment in neighborhoods. Ensure adequate infrastructure is fully funded or in place before promoting more growth to any area or zone, or neighborhood of the city.

7. Amend UV2.5 to read (amendments here address both our concurrency concern and housing concern):

In areas surrounding major transit hubs, except in industrial zones, allow densities sufficient to take advantage of significant investment in public transportation infrastructure. **Ensure funding is available for necessary infrastructure including transportation facilities, or that it is in place before allowing those increased densities.** Use incentive zoning programs, **inclusionary zoning**, and other strategies to help ensure the provision of affordable housing. **Direct more of the city's housing resources into these areas and when public or private development does occur, ensure there is 1 for 1 replacement of any housing that is removed and at comparable price serving the same household types.**

8. Amend UVG27 to read (address both our housing and concurrency concern)

Accommodate concentrations of employment and housing at densities that support pedestrian and transit use and increase opportunities within the city for people to live close to where they work. **Ensure adequate infrastructure is fully funded or in place before promoting more growth to these areas. Ensure existing low income housing that is removed to make way for more growth is replaced 1 for 1 at comparable price.**

9. Amend **UV29** to read as follows:

Designate as residential urban villages areas that are consistent with the following criteria:

Add a point 7 that reads:

7. The area maintains a level of necessary infrastructure and public facilities to support such a designation or a funding plan is in place to ensure adequate provision of these facilities before the area is so designated

10. In Land Use Section (LU) Amend LU 59 to read:

Permit upzones of land designated singlefamily and meeting single-family rezone criteria, only when all of the following conditions are met:

- The land is within an urban center or urban village boundary.
- The rezone is provided for in an adopted neighborhood plan.
- The rezone is to a low-scale singlefamily, multifamily or mixed-use zone, compatible with single-family areas.
- The rezone procedures are followed.

* **sufficient infrastructure and public facilities are in place or fully funded**

11. Amend LUG12 to read:

Promote a residential development pattern consistent with the urban village strategy, with increased availability of housing at densities that promote walking and transit use near employment concentrations, residential services and amenities. **Discourage changes that would add density in those areas that lack adequate infrastructure and public facilities to accommodate that growth and/or where funding cannot be assured to provide those improvements**

12. Amend LU98 to read:

Accommodate housing at densities sufficient to promote pedestrian activity and frequent transit service, as well as support local businesses providing neighborhood services. **Before accommodating increased densities, ensure that necessary infrastructure and public services are in place or fully funded.**

13. In the Transportation Section (T) Add a new policy T68 to read:

When the LOS levels exceed LOS standards for that screenline, discourage additional levels of growth within these areas unless or until additional facilities are either put in place or fully funded in order to bring LOS levels below those standards

14. Add a new T74 to read

In accordance with standards and requirements of the Growth Management Act, any land use changes designed to encourage more growth in a given area or neighborhood shall not be encouraged unless it can be established that there are concurrent levels of service needed ie that LOS standards are met, to accommodate that growth or that there are fully funded plans in place to ensure creation of adequate levels of service for that increased growth

15. In Housing Section (H), amend HG1 to adding an HG1-A Accommodate 47,000 additional households over the 20 years covered by this Plan.

HG1-A to read:

Prior to making recommendations to the regional council for new targets, or finally approving adjustments to these targets within each neighborhood, undertake a thorough process of community review including forums and hearings for the public, and review and comment by the city-wide neighborhood advisory councils

16. Amend H2 by adding an H2-A to read:

Maintain sufficient zoned development capacity to accommodate Seattle's projected share of King County household growth over the next 20 years as described in the Urban Village Element.

Add an H2-A to read:

H2-A: Before implementing new strategies which seek to increase levels of residential growth or increase growth targets in Seattle or in any given neighborhood, undertake a thorough process of community review and make sure that new infrastructure needed to accommodate that growth is fully funded and in the process of being put in place.

II. Here is our recommendation to improve levels of community participation prior to accepting additional levels of growth (needed in order to improve compliance with GMA participation requirements):

1. Amend UV40 to read:

Use 20-year growth targets for urban villages as a tool for planning for the growth that may occur in each urban village. Prior to making recommendations to the regional council for new targets, or finally approving adjustments to these targets within each neighborhood, undertake a thorough process of community review including forums and hearings for the public, and review and comment by the city-wide neighborhood advisory councils. Use these targets as a guide for City plans for development and infrastructure provision. Recognize that the growth targets do not represent the maximum amount of growth that could occur in a village. Recognize also that the private sector builds most housing units and creates most jobs, and, therefore, the growth targets impose no obligation on the City to ensure that those numbers of households or jobs actually occur. Discourage upward adjustment in these targets for the city or any neighborhood of the city unless it can be assured first that adequate infrastructure is in place or that funding is guaranteed to provide that infrastructure.

2. In the Neighborhood Section (N) Amend NG7 to read:

Help to realize the intent of neighborhood plans for areas that will accommodate the bulk of the city's growth

1. through adoption into the Comprehensive Plan of Neighborhood Plan goals and policies,
2. by striving to implement the work plan matrix adopted with each plan, and
3. by recognizing each community's desires, reflected in its proposed neighborhood plan document.
4. by directly involving neighborhoods before adjustments to city and neighborhood specific growth targets are made

3. Amend N9 to read:

Encourage collaborative neighborhood planning that involves simultaneous consideration of City and neighborhood goals and strategies, and includes representatives for both the City and neighborhoods working together, especially prior to adoption of new growth targets or making adjustments to land use and zoning.

III. Here are our policy recommendations to improve compliance with the city's housing preservation goals:

1. Add an additional policy here UVG17 to read:

Before encouraging more density and growth within urban centers and in other areas of the City, implement strategies that ensure no net loss of very low income and low income housing within those areas.

2. Amend UV 24 related to manufacture and industrial areas to read:

UV24 Limit in manufacturing/industrial areas those commercial or residential uses that are unrelated to the industrial function, that occur at intensities posing short- and long-term conflicts for industrial uses, or that threaten to convert significant amounts of industrial land to non-industrial uses. Where housing already exists within these areas, ensure 1 for 1 replacement of low income and affordable units that are removed to redevelopment. Offer incentives to ensure replacement or to avoid removal of those units.

3. Amend UV2.5 to read (amendments here address both our concurrency concern and housing concern repeated above):

In areas surrounding major transit hubs, except in industrial zones, allow densities sufficient to take advantage of significant investment in public transportation infrastructure. Ensure funding is available for necessary infrastructure including transportation facilities, or that it is in place before allowing those increased densities. Use incentive zoning programs, inclusionary zoning, and other strategies to help ensure the provision of affordable housing. Direct more of the city's housing resources into these areas and when public or private development does occur, ensure there is 1 for 1 replacement of any housing that is removed and at comparable price serving the same household types.

4. Amend UVG27 to read as follows (address both our housing and concurrency concern)

Accommodate concentrations of employment and housing at densities that support pedestrian and transit use and increase opportunities within the city for people to live close to where they work. Ensure adequate infrastructure is fully funded or in place before promoting more growth to these areas. Ensure

existing low income housing that is removed to make way for more growth is replaced 1 for 1 at comparable price.

5. Amend UVG28 to read as follows:

Promote the development of residential urban villages, which function primarily as compact residential neighborhoods providing opportunities for a wide range of housing types and a mix of activities that support the residential population. Support densities in residential urban villages that support transit use. Ensure 1 for 1 replacement of low income housing that is removed at comparable price. Discourage adding capacity to these areas unless adequate infrastructure is already in place on planned and fully funded.

6. Amend UV30 to read as follows:

Balance objectives for accommodating growth, supporting transit use and walking, maintaining compatibility with existing development conditions, preserving or ensuring 1 for 1 replacement of low income housing, maintaining affordable housing, and responding to market preferences for certain types of housing, through the density and scale of development permitted.

7. Amend LU 56 to read

:

Permit, through Council or administrative conditional use approval, planned developments on large sites that allow variations from established standards to promote quality design compatible with the character of the area, enhance and preserve natural features and functions, encourage the construction of affordable housing, allow for development and design flexibility, and protect and prevent harm in environmentally critical areas. Do not consider such developments as sole evidence of changed circumstances to justify future rezones of the site or adjacent single-family zoned properties. Before allowing such developments ensure that any low income housing that is removed is replaced 1 for 1 and at comparable price

8. Amend LU73 to read:

Balance the objective to increase opportunities for new housing development to ensure adequate housing for Seattle's residents with the equally important objective of ensuring that new development is compatible with neighborhood character and that there is no net loss of existing low income housing opportunities

9. Amend LU74 to read:

Establish rezone evaluation criteria that consider: maintaining compatible scale, preserving views, preserving or ensuring 1 for 1 replacement of existing low income housing at comparable price, enhancing the streetscape and pedestrian environment, and achieving an efficient use of the land without major disruption of the natural environment.

10. Amend LU89 to read:

Allow exceptions to parking development standards to encourage and facilitate development of ground-related housing, avoid creating additional construction costs, and to buffer areas of low intensity development. When allowing these exceptions if existing low income housing will be removed as a result of such development, require 1 for 1 replacement of that housing at comparable price

11. Amend LUG13 to read:

Provide opportunities for infill development in areas already characterized by low-density

multifamily development provided that any existing low income housing that may be removed as a result is replaced 1 for 1 at comparable price.

12. Amend LU99 to read:

Because low-income elderly and low income disabled persons create lesser impacts than the general population, allow higher maximum density limits in moderate density multifamily zones for housing these populations to reduce costs and provide sufficient density to make the development of such housing feasible. Ensure 1 for 1 replacement at comparable price of existing "very low income" units that may be removed when zoning exceptions are granted for these "low income" developments

13. Amend LU145 to read:

Prohibit new residential uses in industrial zones, except for special types of dwellings that are related to the industrial area and that would not restrict or disrupt industrial activity. Encourage preservation or replacement of low income units that already exist in these areas and require 1 for 1 replacement when granting special exceptions to accommodate new developments in these areas

14. Amend Location Specific Land Use Policy LU 179 to read:

Permit the establishment of zoning overlay districts, which may modify the regulations of the underlying land use zone categories to address special circumstances and issues of significant public interest in a subarea of the city, subject to the limitations on establishing greater density in singlefamily areas and preserving the city's existing stock of low income units. Overlays may be established through neighborhood planning. These overlays also should be considered as a tool in areas where there are concentrations of existing low income housing to help preserve or ensure 1 for 1 replacement of those very low income and low income units. Criteria should be considered for inclusion into existing overlays to protect or ensure replacement of existing low income units within those areas.

15. Amend LU199

Encourage the preservation of housing within major institution overlay districts and the surrounding areas. Discourage conversion or demolition of housing within a major institution campus, and allow such action only when necessary for expansion of the institution. Prohibit demolition of structures with non-institutional residential uses for the development of any parking lot or parking structure which could provide non-required parking or be used to reduce a deficit of required parking spaces. Unless the institution assumes full responsibility for replacement of the housing and at comparable price and affordability or pays an in-lieu of fee to the city equal to full replacement cost, prohibit development by a major institution outside of the MIO district boundaries when it would result in the demolition of structures with residential uses or change of these structures to non-residential uses.

16. Amend H10 to read:

Ensure 1 for 1 replacement of low income and affordable units that are removed to redevelopment especially in areas where additional growth may be planned such as areas in proximity to transit stations. Identify incentives and requirements to ensure replacement or to avoid removal of those units.

17. Amend H21 to read:

Allow higher residential development densities in moderate density multifamily zones for housing limited to occupancy by low income elderly and disabled households, because of the lower traffic and parking impacts this type of housing generates. Ensure that existing very low income units are replaced one for one in cases where these exceptions are granted

18. Amend H32 to read:

Encourage the preservation of existing low-income housing by: using housing programs and funds to preserve existing housing that is susceptible to redevelopment or gentrification; **ensuring very low income units are replaced 1 for 1 at comparable price when redevelopment occurs especially when exceptions to normal land use requirements are granted and where more density is encouraged,** encouraging acquisition of housing by nonprofit organizations, land trusts or tenants, thereby protecting housing from upward pressure on prices and rents; inspecting renter-occupied housing for compliance with the Seattle Housing and Building Maintenance Code; and making available funds for emergency, code related repair.

19. Amend H36 to read:

Promote a broader geographical distribution of subsidized rental housing by generally funding projects in areas with less subsidized rental housing and generally restricting funding for projects in neighborhoods outside of downtown where there are high concentrations of subsidized rental housing **except to ensure 1 for 1 replacement of existing units in those areas.**

20. Amend H47 to read as follows:

Work in partnership among various levels of government and with other public agencies to address homeless and low income housing needs that transcend jurisdictional boundaries.

- a. Work with the federal and state governments to increase public support for housing.
- b. Work with the Seattle Housing Authority to address the low-income housing needs of Seattle residents.
- c. work to ensure that the Seattle Housing Authority continues to prioritize use of its resources especially when used in combination with city funding, projects that serve very low income and public housing eligible households
- d. Where publicly funded redevelopment is occurring allow use of city funding or the granting of land use exceptions to those developments only when there is a net loss of low income units on those sites**

Sincerely,



John V. Fox
For the Coalition

City of Seattle
COMPREHENSIVE PLAN AMENDMENT APPLICATION

Use this application to propose a change in the policies, future land use map, appendices, or other components of the adopted City of Seattle Comprehensive Plan. Applications are due to the Seattle City Council no later than 5:00 p.m. on May 15th for consideration in the next annual review cycle. If May 15th falls on a weekend, the deadline is the Friday closest to that date. Any proposals received after May 15th will be considered in the review process for the following year.

(Please Print or Type)

Date: **May 14th 2010**

Applicant: Seattle **Displacement Coalition (John V. Fox for the Coalition)**

Mailing Address: **4554 12th NE**

City: **Sea** State: **Wa** Zip: **98105** Phone: **206-632-0668**

Email: **jvf4119@zipcon.net**

Contact person (if not the applicant): **John V. Fox (same number and email)**

Mailing Address: **same as above**

Email: same as above

City: **same** State: **same** Zip: **same** Phone: **same**

Name of general area, location, or site that would be affected by this proposed change in text (attach additional sheets if necessary)

Our amendments are city-wide admendments

If the application is approved for further consideration by the City Council, the applicant may be required to submit a Sate Environmental Policy Act (SEPA) checklist.

Acceptance of this application does not guarantee final approval.



Applicant
Signature: _____ May 14, 2010 _____

REQUIRED QUESTIONNAIRE: Comprehensive Plan Amendment Application

Please answer the following questions in text and attach them to the application. Supporting maps or graphics may be included. Please answer all questions separately and reference the question number in your answer. The Council will consider an application incomplete unless all the questions are answered. When proposing an amendment, you must show that a change to the Comprehensive Plan is required.

1. Provide a detailed description of the proposed amendment and a clear statement of what the proposed amendment is intended to accomplish. Include the name(s) of the Comprehensive Plan Element(s) (Land Use, Transportation, etc) you propose to amend.

a. If the amendment is to an existing Comprehensive Plan goal or policy, and you have specific language you would like to be considered, please show proposed amendments in "line in/line out" format with text to be added indicated by underlining, and text to be deleted indicated with ~~strikeouts~~.

b. If the proposed amendment would also require a change to the Seattle Municipal Code (SMC), please indicate the SMC section(s) needing amendment. If you have specific language you would like to be considered, please show proposed edits to the SMC in "line in/line out" format as described above.

The amendments we are proposing should guide future land use changes as they are developed and require new criteria to be met when adopting land use changes. They only kick in when and if these changes are made. It is hoped that they would also “encourage” (but not necessarily require) specific legislation such as new laws to require 1 for 1 replacement of housing that is lost in areas where more development in the future may be encouraged thru rezones and exceptions to the current code.

c. If the amendment is to the Future Land Use Map, please provide a map that clearly outlines the area proposed to be changed. **These are city-wide proposals**

2. Describe how the issue is currently addressed in the Comprehensive Plan. If the issue is not adequately addressed, describe the need for it.

See our introduction contained in our letter preceding our proposed language changes. Our recommendations a) would require a thorough assessment of whether infrastructure and public facilities are in place or funded before adjusting zoning requirements or adjusting city or area specific growth targets ie that there is “concurrency” as required under GMA, b) would ensure increased levels of community input before growth targets and increased density is added to Seattle, and thus ensuring compliance with GMA requirements for citizen input before these changes are made, and c) would build into city policies more assurances that prior to new development and growth in Seattle that requires removal of existing low income housing opportunities that those units are replaced 1 for 1 and at comparable price, ie., our recommendations here are aimed at improving

the city's ability to meet its longstanding goal of preventing displacement and gentrification while still allowing the city to meet its growth objectives.

3. Describe why the proposed change meets the criteria adopted in Resolution 30662 for considering an amendment to the Comprehensive Plan. The criteria are listed at the end of this application form.

Yes. We have reviewed the criteria contained in Res. 30662 and our recommendations are consistent with those criteria.

Is a Comprehensive Plan amendment the best means for meeting the identified public need? What other options are there for meeting the identified public need?

Yes this is the best way because the Comp Plan is where policies are added that then become the legal basis for reviewing adjustments to the land use code and other city decisions related to SEPA, GMA etc.... they establish the city's intent and provide necessary guidance for future decisions. That is what we are seeking with our recommendations

4. What do you anticipate will be the impacts caused by the change in text, including the geographic area affected and the issues presented? Why will the proposed change result in a net benefit to the community?

As stated in our introduction and in response above to preceding questions, our recommendations ensure compliance with GMA requirements for citizen participation and "concurrency", and provide more specific guidance to ensure that the city's longstanding commitment to housing preservation, and neighborhood participation are effectively implemented.

5. How would the proposed change comply with the community vision statements, goals, objectives, and policies of the Comprehensive Plan? Please include any data, research, or reasoning that supports the proposed amendments.

As stated above, our recommendations provide more specific guidance to ensure that the city's longstanding commitment to housing preservation, and neighborhood participation are effectively implemented. These commitments run throughout the comp plan and the language we are proposing simply ensures these goals and policies are realized more effectively and there is consistency in goals and policies under each category of the plan with respect to these goals and policies

6. Is there public support for this proposed text amendments (i.e. have you conducted community meetings, etc.)? Note: The City will provide a public participation process, public notice, and environmental review for all applications.

Unequivocally Yes. The proposals have been vetted extensively with neighborhood organizations from across the City and written with an eye to addressing direct input we have receive vis a vis these policies

Your comprehensive Plan Amendment Application must be received by the City Council no later than 5:00 p.m. on May 15th to be considered in the next year's annual review process. You can send your application via e-mail (the preferred method) to compplan@seattle.gov, or via regular mail to: Office of the City Clerk, 600 Fourth Avenue, Floor 3, PO Box 34025, Seattle, Washington 98124-4025.

Criteria for Comprehensive Plan Amendment Selection (from Resolution 30662)

The following criteria will be used in determining which proposed Comprehensive Plan amendments will be given further consideration:

- A. The amendment or policy is appropriate for the Comprehensive Plan because:
 - The amendment is not appropriate as a regulatory measure, and warrants a Comprehensive Plan amendment;
 - The amendment is not better addressed as a budgetary or programmatic decision;
 - The amendment is not better addressed through another planning process, such as neighborhood planning; or
 - The Growth Management Act (GMA) mandates the amendment as part of the 10-year update.

- B. The amendment is legal - the amendment meets existing state and local laws.

- C. It is practical to consider the amendment because:
 - The timing of the amendment is appropriate and Council will have sufficient information necessary to make an informed decision;
 - City staff will be able to conduct sufficient analysis and to develop policy and any related development regulations within the available time frame;
 - The proposed amendment is consistent with the overall vision of the Comprehensive Plan and well-established Comprehensive Plan policy, or the Mayor or Council is interested in significantly changing existing policy;
 - The amendment has not been recently rejected; and
 - If the proposed change is to neighborhood plan policies, there has been a neighborhood review process to develop the proposal, or a neighborhood review process can be conducted prior to final Council consideration of the amendment.