



City of Seattle Seattle Planning Commission

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October 19, 2007

Honorable Councilmember Peter Steinbrueck
Chair, Urban Development and Planning Committee
Seattle City Council
PO Box 34025
Seattle, WA 98124-4025

RE: Seattle Planning Commission Comments on the Proposed 2007 Amendments to Seattle's Comprehensive Plan.

Dear Councilmember Steinbrueck:

The Planning Commission is pleased to provide you and the City Council with its comments and recommendations on the 2007 Proposed Comprehensive Plan Amendments. As the stewards of the Comprehensive Plan we know that changes to this document are vital for shaping the future of Seattle. We offer the following recommendations;

A. Multifamily policy changes: The purposes of the changes are to remove language that is overly specific for the level of general guidance expected of Comp Plan policies, or that duplicates other policies. Included are revised policies on density limits, development standards, low density multifamily areas, and high density multifamily areas.

Commission Recommendation & Comments: APPROVE

The Planning Commission agrees that the changes generally promote greater policy flexibility in order to achieve goals of the code rewrite. The policies regarding density limits in particular are a positive step in supporting the Comp Plan's growth management objectives. We have been following the development of changes to the multifamily code rewrite and will continue to review and advise on this effort as the land use code changes move forward.

B. Affordable housing as a public benefit for zoning changes Gives affordable housing priority over other potential public benefits when allowing greater density.

Commission Recommendation & Comment: APPROVE

We have made significant comment on this issue in the Commission's 2007 Incentive Zoning White Paper which can be found at on our website at www.seattle.gov/planningcommission.

C. Future Land Use Map change related to the Fort Lawton Army Reserve Center: The amendment seeks to change the Future Land Use Map designation of Fort Lawton from single family to multifamily to support a plan associated with decommissioning the Fort Lawton Army Reserve Center for reuse as a multifaceted facility to serve the homeless.

Commission Recommendation & Comments: CONDITIONAL APPROVAL

The Commission generally supports this amendment. We feel that this amendment will help enable housing to serve the homeless at this site. In this tight land market it is difficult to find affordable opportunities for providing this essential housing need and the city should embrace this opportunity. With that said we recommend that the City ensure the rezone will include planning for potential transportation impacts and will work with King County Metro to better serve this site with transit. The proposal would place a large number of people in an area with very little transit service or infrastructure, and the city should ensure both are provided. Our approval of this amendment into the Comp Plan is conditioned on a demonstrated commitment by city officials to address the essential public transit needs of the use of the site for housing to serve the homeless.

D. Sustainability goals related to: 1) greenhouse gases; 2) green canopy in the city.; 3) aggressive solid waste reduction; 4) management of transportation demand in Urban Centers; 5) city as an affordable place to live in all respects; 6) number of healthy years lived by Seattle residents

This amendment, forwarded by Council, is meant to ensure the City is monitoring its efforts to achieve greater sustainability. In order to achieve the goal of being a carbon-neutral city by 2030, aggressive numbers must be pursued.

Commission Recommendation & Comments: NO RECOMMENDATION

While we are extremely supportive of the strengthening the City's commitment to sustainability and the idea of employing measurements to track our progress, we want to ensure metrics are well thought-out and adequately funded. It is worth noting that there are metrics currently outlined in the Comprehensive Plan that are not accurately measured so the addition of these new metrics raises a question about the city's commitment and action plan for ongoing measurements that help the city achieve these worthy policy goals. We have not seen nor had the opportunity to review the analysis that most of the numbers are based on. For this reason the Commission does not feel that we are in a position to give a recommendation on approval.

We do note that Goal 6 as written may not be appropriate for the Comprehensive Plan. We suggest wording for this goal could be 'create an environment in which a healthy lifestyle can be pursued.'

E. Crown Hill Future Land Use Map amendment: The proposed amendment would enable policy addition to enable the rezone of an existing multifamily structure partially located in a single-family zone in the Crown Hill-Ballard community.

Commission Recommendation & Comment: APPROVE

We recommend exploring the option of altering neighborhood plan language to allow for the change.

F. Commercial space exemption in the Duwamish Manufacturing/Industrial Center: The new recommended comp plan policy, UV24.5, states 'In order to retain businesses that provide a high number of well-paying jobs, existing large non-industrial uses may be allowed to expand within a M/IC through land use controls which also help ensure that continued industrial uses remain the primary uses in the M/IC.'

Commission Recommendation & Comments: DO NOT APPROVE

We do not support the amendment as currently written. From a procedural perspective we feel that the Comp Plan is not designed to respond to a site-specific proposal such as this. It's our assessment that many aspects of the policy could be open to broader interpretation and could be used as a rationale to allow uses in industrial zones that would undermine industrial zoning. In the Commission's July, 2007 report *'The Future of Seattle's Industrial Land'* we stated that these types of special allowances should be severely limited and only allowed in special circumstances when there is a well-documented public policy rationale for doing so and that the city should outline clear and understandable criteria for meeting a high threshold. The proposed Comp Plan amendment does not detail such a rationale. The Commission cannot adequately assess this proposed Comp Plan change without simultaneously analyzing the corresponding land use code amendment. Any corresponding land use code proposal should include details on what mechanisms and land use controls would be used to 'help ensure that continued industrial uses remain the primary uses'. It should also include other ways in which the land owner would mitigate the impacts to industrial uses. The Commission is currently preparing a more detailed recommendation on how the City should evaluate and assess a potential land use code amendment with regard to this site and will provide it for your review before the end of the month.

G. Parking facilities in City parks: Parking facilities in City parks should be designed to reduce the amount of land used for the facility, while still allowing for construction of the facility.

Commission Recommendation & Comments: DO NOT APPROVE

This amendment, as currently written, is inappropriate for the Comprehensive Plan. Seattle's parks provide a diverse collection of services and programs to Seattle residents. Every park should be viewed on a case by case basis, considering its nature as a regional or local park, its size, the surrounding uses, and other considerations. This parking policy does not seem to take into account the diversity of our city parks. However, generally the Commission does support a policy that prioritizes park related amenities and services as opposed to prioritizing parking.

H. Furthering pedestrian safety: The proposed amendments identify tools for promoting safer walking, bicycling, and driving.

Commission Recommendation: APPROVE

I. "Complete streets" concept: These amendments identify tools for promoting safer walking, bicycling, and driving and to better align comprehensive plan goals and policy with recent "Complete Streets" legislation.

Commission Recommendation & Comments: APPROVE

We support all efforts by the city to align its different modal plans and we support the complete streets approach which coordinates transportation routes and prioritizes bikes, pedestrians, and transit. The Commission strongly believes that the needs of bicyclists and pedestrians must be balanced with the needs of freight mobility in industrial areas and areas surrounding industrial zoned land. Freight mobility should be the top priority on Major Truck streets.

J. Affordability goals for households earning 80-120% of median income: This amendment establishes housing affordability goals for households earning 80-120% of median income.

Commission Recommendation & Comments: APPROVE

The Commission has previously advocated that special attention be focused on households in this income range. Seattle's working class is being priced out of the housing market yet there is little focus on tools and policies to address this issue. Providing affordable housing goals geared towards those making 80 – 120 percent of median income in the Comprehensive Plan is a critical first step to the larger effort that is needed.

K. Increase access to worker training and social support for working families: This amendment include new economic development policy language regarding worker training and social support for working families

Commission Recommendation: APPROVE

L. Include “heritage” within the concept of “culture”: Amendment proposes including “heritage” within the concept of “culture” in the Cultural Resources element.

Commission Recommendation: APPROVE

M. Further public safety: Amendment proposes New policies addressing crime statistics and the public's perception of safety.

Commission Recommendation: APPROVE

N. Include “resilient city” concept in City's emergency management planning: Amendment proposes a new policy on coordinating service delivery to vulnerable populations in the event of an emergency as part of a “Resilient City” strategy.

Commission Recommendation: APPROVE

O. Support excellent educational system for all Seattle students: These amendments express continued the City of Seattle commitment to education and worker training.

Commission Recommendation: APPROVE

P. Use natural drainage and restored watersheds to handle storm water: This amendment will put in place a new policy placing a priority on solving drainage problems with natural drainage system approaches and by restoring watershed elements such as forests, wetlands, and natural channels.

Commission Recommendation: CONDITIONAL APPROVAL

The Commission would like to note that there is a potential conflict between natural drainage systems and increasing pedestrian safety by building more sidewalks throughout Seattle. Often times there are insufficient funds to both build a sidewalk and ensure a natural drainage system. This amendment should be coordinated with amendments H and I, and should be explicit about how it intends to resolve the likely conflicts that will arise between prioritizing both pedestrian safety and natural drainage systems.

Q. Defining City's industrial lands strategy: These amendments create new policies in the Land Use element expressing support for an industrial lands strategy that protects the bulk of Seattle's industrial land, especially the land in Manufacturing/ Industrial Centers, from conversion to other uses.

Commission Recommendation & Comments: APPROVE

The proposed Comp Plan language will enable many of our policy recommendations outlined in the Commission's July 2007 'Future of Seattle's Industrial Lands' report to be enacted.

The proposed policy LU148 clarifies that the most intensive industrial zones (IG1 and IG2) are most appropriate in the M/ICs, helping to indicate that when industrial zones are called for outside the M/ICs, the City should consider the less intense industrial zones – IB and IC. This policy is consistent with the recommendations in our July report. In the report we state "*The City should treat land in Seattle's MIC as an area that requires additional sanctuary from uses that degrade and compromise industrial uses. Seattle should consider applying some of the strategies used by cities regarding 'industrial sanctuaries' to Seattle's MICs*". In our report we make the case that land that is both IG and within an MIC should receive special protection whereas we recommend studying IC zones as a place that could allow for more flexibility including possible increased allowances in FAR aimed at better facilitating 'R&D lab' uses.

The proposed LU 149 clarifies that industrial zones (which are the only zones in the city that do not permit housing) are generally not appropriate in urban centers and urban villages, where one of the primary purposes is to accommodate future population growth. We have noted in the past that the redesignation of South Lake Union as an Urban Center might constitute a change in designation for that area from Industrial to a more flexible zoning designation. We do caution however that the City should not use this policy to justify the redesignation of industrial land to urban centers. In order to provide certainty and stability to the industrial areas the City should refrain from entertaining requests to redesignate major portions of industrial land to urban centers or urban villages.

Recommended new policy UV24.6 states that the City should limit its own uses on land in the MICs to uses that are not appropriate in other zones and should discourage other public entities from siting non-industrial uses in MICs. This is consistent with the report where we recommend, "*Public agencies should be discouraged from locating inappropriate uses that disrupt the industrial nature of these areas*".

R. South Lake Union Future Land Use Map amendment: This amendment proposes a map change would better align the goals and policies that reflect South Lake Union's new designation as an urban center and would allow the corresponding new growth estimates by enabling a rezones from the current industrial zoning to Seattle Mixed zoning. Seattle Mixed zoning designation is intended to help meet the neighborhood's goal of allowing housing throughout the neighborhood.

Commission Recommendation & Comments: DEFER

We support deferring this amendment until the rezone analysis is completed in 2008.

S. South Downtown policy and Future Land Use Map amendments: The scope of the amendments have not fully determined at this time, but will likely include redesignation of land in the Downtown Urban Center that is now designated for industrial uses and possibly a southward relocation of the Urban Center boundary.

Commission Recommendation & Comments: DEFER

We support deferring amendments related to South Downtown policy and the future land use map until the completion of the EIS in 2008. The Commission's *Future of Seattle's Industrial Lands* report and Mayor's recently released recommendations on Industrial Lands should also provide guidance.

T. Harbor Avenue Future Land Use Map amendment: The proposal is to allow the CEM Property near Terminal 5 in the Duwamish Manufacturing/Industrial Center to be redesignated from industrial to commercial/mixed use on the Future Land Use Map, and to revise the boundary of the Duwamish M/IC to exclude the CEM Property

Commission Recommendation & Comments: DEFER

We support deferring this until 2008 when the study of lands just inside M/IC boundaries has been completed.

U. Nordic Heritage Museum Future Land Use Map amendment: The amendment would allow a new building for cultural facility.

Commission Recommendation & Comments: DO NOT APPROVE

We believe that there are unintended consequences and far-reaching effects of a map amendment. We intend to closely follow any proposed Land Use Code amendment to allow a new facility on the site and will prioritize protecting the area's industrial character.

V. Colman Dock ferry terminal redevelopment

Commission Recommendation & Comments: DO NOT APPROVE

We concur with the executive's recommendation of not approving this amendment and instead letting the joint Council-Mayoral resolution serve as template for future development on site.

W. Reconsider designation of North Highline as a Potential Annexation Area: This Amendment would reverse the designation of North Highline as a Potential Annexation Area (PAA).

Commission Recommendation & Comments: DO NOT APPROVE

We support preserving the existing PAA designation until the cooperative planning effort with King County, Burien and others can determine the best way to help North Highline transition from its unincorporated status.

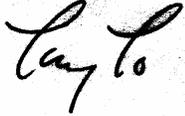
X. Reconsider 2006 Future Land Use Map amendment at Goodwill site

Commission Recommendation & Comments: DO NOT APPROVE

Although it is understandable that the City would want to look at the 2006 decision in the context of Industrial Lands Strategy and South Downtown study we also believe that it sets a bad precedent to retract a recently passed land use decision. In addition, the Commission recognizes the Goodwill site is in a designated Urban Center and not in a MIC, and that industrial zoning may not be appropriate for the site.

We appreciate all of the work done by the Executive, the Council and by a number of citizens in developing the 2007 Comprehensive Plan amendments. It is through such collaborative efforts that we ensure Seattle's Comprehensive Plan provides a dynamic policy framework for the future. Thank you for the opportunity to provide comments and we are happy to discuss these recommendations in more detail as you wish.

Sincerely,



Tony To, Chair

cc: Mayor Greg Nickels
Seattle City Councilmembers
Tim Ceis, Nathan Torgelson, Mayor's office
Rebecca Herzfeld, Ketil Freeman, Bob Morgan, Council Central Staff
Diane Sugimura, John Rahaim, Tom Hauger, John Skelton, Lish Whitson, Mark Troxel, DPD

SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURE & RECUSAL

Amendment re: Multifamily Tax Exemption

- Commissioner Tom Eanes disclosed that he works for Hewitt Architects and they might be involved in multifamily projects in the future.
- Commissioner Chris Fiori disclosed that he works for Heartland and they do work in multifamily zones.
- Commissioner Martin Kaplan disclosed that he works for Martin Henry Kaplan Architects and they do work in multifamily zones.
- Chair Tony To disclosed that his firm, Homesight, does work in multifamily zones.

Amendment re: Affordable housing as a public benefit for zoning changes

- Chair Tony To disclosed that his firm, Homesight works on affordable housing.

Amendment re: Future Land Use Map change related to the Fort Lawton Army Reserve Center

- Commissioner Amalia Leighton disclosed that the firm she works for, SvR Design was doing some work on this project.
- Commissioner Chris Fiori disclosed that his firm, Heartland, does work on the Fort Lawton redevelopment.

Amendment re: Commercial space exemption in the Duwamish Manufacturing/Industrial Center

- Commissioner Colie Hough-Beck disclosed that she owned Starbucks stock.

Amendment re: Parking facilities in City parks

- Commissioner Tom Eanes disclosed that his wife works for the Seattle Zoo and that his firm, Hewitt Architects, designed the garage.
- Commissioner Colie Hough Beck disclosed that her firm, Hough Beck and Baird Inc., in contract negotiations with the Seattle Parks Department.
- Commissioner Leighton disclosed that her firm, SvR, has contracts with SPU, SDOT and the Seattle Parks Department.

Amendment re: "Complete streets" concept

- Commissioner Amalia Leighton disclosed that her firm, SvR Design, worked on Complete Streets.

Amendment re: Affordability goals for households earning 80-120% of median income

- Commissioner Tony To (Homesight) disclosed that his firm, Homesight works on affordable housing.

Amendment re: Increase access to worker training and social support for working families

Amendment re: Defining City's industrial lands strategy

- Commissioner Martin Kaplan disclosed that his firm, Martin Henry Kaplan Architects, does work in industrial zones.

Amendment re: South Lake Union Future Land Use Map amendment

- Commissioner Colie Hough-Beck disclosed that she works and lives in South Lake Union.

Amendment re: South Downtown policy and Future Land Use Map amendments

- Commissioner Mark Johnson disclosed that his firm, Adolfsen, was involved in some of the noise studies done in South Downtown.

Amendment re: Nordic Heritage Museum Future Land Use Map amendment

- Commissioner Amalia Leighton disclosed that the firm she works for, SvR Design is involved in planning the Burke-Gilman trail and that it could pass through the site in question.

-Commissioner Jerry Finrow recused himself due to the fact that he is a financial supporter of the Nordic Heritage Museum.

Commissioner Finrow left the room. And did not participate in any discussions regarding this matter

Amendment re: Colman Dock ferry terminal redevelopment

- Commissioner George Blomberg (Port of Seattle) disclosed that he works for the agency that owns Port 48, which could be affected by the Colman Dock redevelopment. (George Blomberg retired from the Commission in April)