



City of Seattle

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September 9, 2005

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

Dear Councilmember Steinbrueck:

The Planning Commission is pleased to provide you and the City Council with its comments and recommendations on the Mayor's Recommended Comprehensive Plan Amendments 2005. The Commission participates in the annual Comprehensive Plan amendment process at two stages: first the Commission reviews the original amendment submissions and provides recommendations to the Council regarding which proposals should be considered and further analyzed and secondly, the Commission reviews the Mayor's final set of recommended amendments as they are submitted for Council approval.

Seattle Planning Commission Comments on the Mayor's Recommended Comprehensive Plan Amendments, 2005

(Page numbers refer to the Department of Planning and Development Director's Report)

Amendments to Authorize a North Bay Overlay (page 24)

Mayor's Recommendation: Do not adopt a Comp Plan amendment to establish an overlay on the site. Instead, the City may adopt an overlay that would allow consolidation of office uses on the site through an amendment to the Land Use Code. The Mayor does not believe an amendment to the Plan is required.

Commission Comments: The Commission generally supports the Mayor's recommendation. The Commission has previously recommended that amendments involving industrial lands should be deferred until the City develops an industrial lands strategy. The Commission reiterates that recommendation. Furthermore, the Commission believes a zoning overlay that would allow consolidation of office uses may indeed impact the intent of the underlying zoning and could thus trigger the need for a Comp Plan amendment. More information is needed on the specific plans of the Port of Seattle and development options available to them before the Commission can make a definitive recommendation.

The Interbay/North Bay site is a significant piece of the City's industrial zoned land and any changes to this area should be carefully considered. The Commission strongly

recommends that decision at the Interbay (aka North Bay) site be further studied in the context of the City's overall industrial land assets and the policies in place to protect them. The Commission has previously recommended that the City develop an industrial lands strategy and looks forward to working on the strategy that is currently being developed. The Commission appreciates the initial assessment conducted by the Office of Economic Development and Department of Planning and Development as detailed in the August 1, 2005 Industrial Land Study. The Study should be the first step in a multi-departmental collaborative effort to address the future needs of industry in Seattle. To support this effort, the Commission plans to convene an industrial lands strategy roundtable in the autumn of 2005. These efforts will facilitate the further analysis needed of the Port of Seattle's proposal for North Bay and assist in the development of that area as an asset to the Port, the City, and the regional economy.

Commercial Code-Related Policy Changes (page 4)

Part 1: Amend Land Use Element to be consistent with Council direction on revisions.

Mayor's Recommendation: Amend LU109 so that size-of-use limits may apply equally to new and existing businesses.

Commission Comments: The Commission generally supports this change to allow more flexibility in size of uses in the City's neighborhood business districts.

Part 2: Add language to policy LU50 regarding consideration of local conditions in setting parking requirements.

Mayor's Recommendation: Do not amend LU50 to include language that parking requirements for urban centers and villages should account for local conditions and planning objectives.

Commission Comments: The Commission understands that it is standard practice for the City to work with communities in determining parking requirements for their neighborhoods, however there is an advantage in including this language in the Comprehensive Plan in order to ensure that local conditions and planning objectives are met on a neighborhood by neighborhood basis. In this instance, it is unlikely that a one-size-fits-all approach to parking requirement is appropriate for the City, and adding this language would encourage a more specific and appropriate solutions for parking and vehicle use conditions in the City.

In the Commission's recent comment letter of the City's Neighborhood Business District Strategy dated April 15, 2005, the Commission made the following comment about parking:

The Commission generally supports the reduction in parking quantity requirements in commercial zones, as well as changes in development regulations governing location of and access to parking. However, the proposed changes may need to be refined to meet the needs of specific communities.

The Commission agrees that the City's current parking requirements are out of date and generally supports reducing minimum on-site parking requirements. The proposed reductions in minimum on-site parking requirements are intended to match requirements better with specific demand, thus reducing the adverse effects of excessive parking requirements. One caveat - parking needs, as well as attitudes toward parking requirements, vary among neighborhoods around the City. It may be necessary to refine the proposed changes with additional locational criteria.

Part 3: Add language to policy LU115 regarding neighborhood review of locations where street-level residential uses would be permitted.

Mayor's Recommendation: Do not amend LU115 to include language that requires neighborhood review of mapping where street-level residential uses would be permitted.

Commission Comments: The Commission acknowledges that the City has conducted neighborhood reviews and assessments with six communities, and will continue the process in the near future working with neighborhoods to identify pedestrian zones in their neighborhood commercial districts (and therefore, where street-level residential uses would be allowed in Neighborhood Commercial zones). Nevertheless, we believe it would be advantageous to include this language in the Comprehensive Plan to ensure that neighborhood consultation is a required part of the process. The Commission believes that public involvement in the planning process is an essential principle and is thus a relevant goal to include in the Comprehensive Plan.

Downtown Land Use Code Amendments (page 7)

Mayor's Recommendation: Amend wording in the Downtown neighborhood plan to more closely align with the Mayor's recommendations for changes in the height and density standards for downtown neighborhoods.

Commission Comments: The Commission generally supports these specific changes. The proposed changes are intended to clarify language on growth targets and density and the Commission agrees with this objective. The last item on removing requirements for minimum parking requirements for downtown development is also a goal supported by the Commission.

Central Waterfront Plan Amendments to Shoreline Policies (page 38)

Mayor's Recommendation: Reconsider in 2006 after the concept plan for the Waterfront has been further developed.

Commission Comments: The Commission supports the Mayor's recommendation on this amendment.

South Wallingford Neighborhood Plan (page 11)

Mayor's Recommendation: Adopt the South Wallingford Neighborhood Plan goals and policies.

Commission Comments: The Commission understands that these goals and policies have been developed in consultation with community representatives. However, since the Commission was not provided an opportunity to review the goals and policies we abstain from making any recommendations at this time.

Rainier Beach Urban Village Boundary (page 12)

Mayor's Recommendation: Change the boundary of the Rainier Beach Residential Urban Village westward to include parcels between the existing urban village and the future Henderson Street Light Rail Station.

Commission Comment: Although the Commission supports the idea of expanding the Rainier Beach Residential Urban Village to include the future transit station, the Commission has not been presented with sufficient detail to adequately review the specific proposal. As a result, the Commission has not

been able to assess the proposal in light of the existing neighborhood plan. The Commission would also benefit from receiving a briefing on public outreach done in developing this proposal. Therefore, the Commission abstains from making a recommendation at this time.

**Expand Northgate Urban Center Boundary; and
Changes to Encourage Housing Development near Northgate Way (page 38)**

Mayor's Recommendation: Defer consideration of both of these amendments until after a Northgate housing study (currently underway) is completed. Results of the study are expected prior to the 2006 Comprehensive Plan annual amendment cycle and amendment proposals may be part of the results of that study.

Commission Comment: The Commission supports the Mayor's recommendation and is currently assisting City staff in the study.

Designate Dravus Street Area of Interbay as Hub Urban Village (page 25)

Mayor's Recommendation: Do not amend the Comprehensive Plan to design the Dravus area as an urban village; to consider applying a station area overlay if the plan for a monorail station at this location proceeds; to entertain specific requests for rezones in light of applicable locational criteria; and consider a broader planning effort in the 15th Avenue corridor to look at the future development potential for the area between roughly the Magnolia Bridge and the Ballard Bridge.

Commission Comment: The Commission supports the Mayor's recommendation on this amendment. Although the area does not meet the threshold requirements to be designated an urban village, the Commission feels that there is merit in additional study of the area and consideration of its development potential.

Urban Village Designation Criteria (page 16)

Mayor's Recommendation: Incorporate language from City Council Resolution 29232 directly into the Comprehensive Plan which provided detailed descriptions of the desired characteristics in designating potential urban villages. The criteria has not changed, they are simply being added to the Comprehensive Plan for ease of access to the information.

Commission Comment: The Commission supports this recommendation.

Other Minor Amendments

Part 1: Transportation Element Amendments (page 18)

Mayor's Recommendation: Add language to clarify roles and relationship between the Comprehensive Plan and the Transportation Strategic Plan.

Commission Comments: The Commission has previously recommended that such clarity be provided and strongly supports this amendment.

Part 2: Environment Element (page 19)

Mayor's Recommendation: Add "litter and graffiti" to noise and odor as elements the City wants to control in order to protect human health and the livability of the urban environment.

Commission Comments: The Commission supports this recommendation.

Part 3: Urban Village Appendix A (page 20)

Mayor's Recommendation: Correct computation errors in the Urban Village Appendix A

Commission Comments: The Commission supports this recommendation.

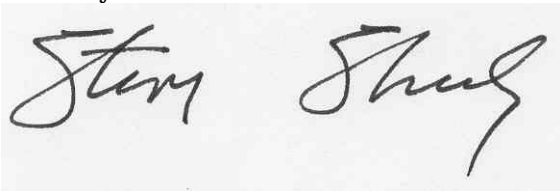
Part 3: Urban Village Appendix B (page 20)

Mayor's Recommendation: Amend Urban Village Appendix B to expand the open space goal from downtown commercial core to all urban centers.

Commission Comments: The Commission supports the Mayor's recommendation.

The Commission appreciates the opportunity to comment on the Mayor's Recommended Comprehensive Plan Amendments for 2005. We look forward to working with you and the Council on these items this Fall.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Sheehy". The signature is written in a cursive style with a large, sweeping "S" and a long, trailing "y".

Steve Sheehy
Chair

cc: Mayor Greg Nickels
Seattle City Council Members
Tim Ceis, Deputy Mayor
Sung Yang, Mayor's office
Diane Sugimura, DPD
John Rahaim, DPD

Tom Hauger, DPD
John Skelton, DPD
Lish Whitson, DPD
Mark Troxel, DPD
Rebecca Herzfeld, Council Central Staff
Bob Morgan, Council Central Staff