



City of Seattle

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Kirsten Pennington
Steve Sheehy

Barbara Wilson,
Executive Director
Casey Mills,
Planning Analyst

April 30, 2007

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

RE: 2007 Comprehensive Plan Amendments Threshold Resolution

Dear Councilmember Steinbrueck:

The Planning Commission is pleased to provide you and the City Council with its comments and recommendations on the Mayor's 2007 Comprehensive Plan Amendments Threshold Resolution. We participate in the annual Comprehensive Plan amendment process in two stages: first, we are briefed on the amendment submissions and provides recommendations to the Council regarding which proposals it feels should be considered and further analyzed; and secondly, we review the final set of recommended amendments later in the year and provides its recommendations regarding adoption of each proposed amendment.

The Commission's approval to include specific proposed amendments in the threshold resolution should in no way be interpreted as our approval of the specific proposal itself – it is only our agreement that the proposal should be further studied for possible inclusion as an amendment later in the year.

We are in general agreement with the recommendations in the Executive's threshold resolution with the exception of one. In addition we have comments on several of the amendments and make suggestions for further analysis.

Industrial Lands

We feel it necessary to note that five of this year's proposed amendments seek to change industrial zoned land to another designation. The Commission has been concerned about the City allowing conversion of land from industrial zoning to any other zone before the Industrial Lands Strategy has been completed. We recognize that this effort is well underway and look forward to using the strategy when evaluating and making recommendations for future decisions to reclassify industrial land. We have suggested that criteria be developed that will give the City better guidance in making these important decisions. It is critical that the City have a clear public policy basis for its industrial zoned areas so that a rational framework and an environment of certainty exist pertaining to the City's commitment to retaining its industrial base.

Amendment referring to the Multifamily Zoning Update

We agree with including this proposed amendment for further study. The Commission agrees that the Comprehensive Plan language should allow for future changes in the Multifamily Code that provide greater flexibility than at present. The Department of Planning and Development (DPD) should consider transportation in addition to the issues it is proposing to study.

Amendment referring to Prioritizing Permanently Affordable Housing among Public Benefits

We agree with including this proposed amendment for further study. The Commission has concerns that the proposed amendment is too strict, and DPD should make sure to study whether or not it will have unforeseen consequences. The Commission has stated that 'workforce housing' should be prioritized in public benefits programs, but suggested that a threshold be developed so that when a large enough amount of benefits are obtained, funds can be used for other public amenities, including infrastructure improvements. DPD should ensure that this sort of threshold system would not be precluded by the proposed amendment or that we would not preclude the City from using the benefits for workforce housing.

Amendment referring to Changes to Future Land Use Map to reflect City's preferred direction for redevelopment of the Fort Lawton Army Reserve Center

We agree with including this proposed amendment for further study. DPD should investigate the possible consequences of a lack of public transportation to the proposed site, and explore the possibility of tying the proposal to the level of transit service that should be provided for the potential new residents and employees at the site.

Amendment referring to Madrona Neighborhood

We agree with including this proposed amendment for further study. DPD should ensure that the proposed changes are consistent with the neighborhood plan and have adequately completed a neighborhood review process.

Amendment referring to Future Land Use Map – Crown Hill

We agree with including this proposed amendment for further study. DPD should make every effort to ensure that this needs to be a Comprehensive Plan amendment rather than a legislative rezone. Initially, it doesn't appear to rise to the threshold of necessitating a Comprehensive Plan amendment.

Amendment referring to Zoned Brownfield's in Transitional Areas of the Duwamish Manufacturing Industrial Center.

We take no position on this amendment because we have not had the benefit of full review and analysis of the newly submitted revised proposal which is more specially defined. We acknowledge that the new proposal could be worthy of further study if its scope has been sufficiently narrowed and contains a more specific focus but we have not had the opportunity to adequately analyze the revised amendment to make a recommendation. We do note that recent analysis may indicate 10-acre plus sites are potentially some of the most in-demand sites for Seattle industrial uses. While the site may seem like an unnecessary and underutilized brownfield now, this could change as conditions change. We recognize there may indeed be value in cleaning up small contaminated sites that abut residential property.

Amendment referring to Future Land Use Map – Nordic Heritage Museum

We agree with including this proposed amendment for further study. We recommend a number of things be considered in the analysis of this amendment; 1) Ballard neighborhood residents should be engaged on the issue and their input should be considered; 2) The area of study should be broader than just that within

the proposal's boundary. Broadening the area of study will help to understand the proposal's effect on adjacent uses and the surrounding neighborhood, as well as help provide guidance for the future of the area, which is undergoing significant change; 3) Housing may not be an appropriate use on this site and may put a strain on adjacent industrial uses. If multifamily housing is considered for the proposed area, affordable housing considerations should be taken into account. Parcels on the northern edge of Market in particular could receive a significant increase in land value should the amendment be approved, so including an affordable housing component to the proposal is a possibility that should be explored; 4) We recommend more study in the area of shoreline regulation and historic preservation as it relates to the proposal.

In addition we would like to suggest that a regulatory change may allow the proponent the ability to get the larger structure they desire without including a housing component or necessitating a need for a Comprehensive Plan amendment and this possibility should be extensively explored.

Amendment referring to Future Land Use Map – South Lake Union

We agree with including this proposed amendment for further study. The Commission has been very concerned about the City allowing conversion of land from industrial zoning to any other zone before the Industrial Lands Strategy has been completed. The Commission has recommended that part of the Strategy should include developing criteria for evaluating future decisions to reclassify industrial land. Such criteria will likely include factors such as whether the industrial area in question is within a Manufacturing and Industrial Center (MIC) or whether there has been a significant change in the designation of the area. South Lake Union was recently designated as an Urban Center in the city's Comprehensive Plan. This designation triggered significant analysis, public involvement and neighborhood planning. These efforts will be helpful, along with the expected criteria that will result from the completion of the Industrial Lands Strategy effort, in making a decision concerning this proposal.

Amendment referring to Future Land Use Map – South Downtown

We agree with including this proposed amendment for further study. Again, the Commission reminds you of our concern about allowing conversion of land from industrial zoning to any other zone before the Industrial Lands Strategy has been completed. Once again, we will look to the criteria established in the Strategy for weighing the merits of this proposal to reclassify this industrial land for other uses.

Amendment referring to exempt an area of the Duwamish MIC from Size-of-Use Limits on Office Space

We agree with including this proposed amendment for further study. As stated above we await the Industrial Lands Strategy to help guide us in making a recommendation in changing the designation of land currently zoned for industrial uses. In addition, we recommend that DPD include in their study exploration of the effect any possible street vacations that might be part of the project and their impact on transportation in the area. In addition, DPD should study the effect of the addition of a large number of workers to the area on the transportation system, including whether current transit can handle the new occupants and the comparative effects of adding workers to the proposed development site instead of to an Urban Center, such as Downtown.

Amendment referring to Prohibit Structured Parking on or Near Parks Property

We agree with not considering this amendment further. This amendment would unnecessarily constrain future development proposals and the negotiation process between various stakeholders for those proposals.

City Council 2007 Comprehensive Plan Urban Sustainability Goals and other Amendments

For the purposes of our recommendations on the threshold resolution the Planning Commission will not have the ability to adequately review the proposed amendments. We did have the opportunity to do a cursory review of the proposed amendments at our April 26, 2007 full Commission meeting. Council staff was present and briefed us on the proposed amendment and took our informal comments at that time. We will thoroughly review the amendments that move forward for further study and are happy to assist you as these amendments develop.

Thank you for the opportunity to provide you with our recommendations regarding the Threshold Resolution. We look forward to providing you with assistance as the 2007 Comprehensive Plan amendment process moves forward.

Sincerely,



Jerry Finrow, Chair

cc: Mayor Greg Nickels
Tim Ceis, Deputy Mayor
Diane Sugimura, Director, DPD
John Rahaim, DPD
Tom Hauger, DPD
John Skelton, DPD
Mark Troxel, DPD

Seattle City Council Members
Rebecca Herzfeld, Council Central Staff
Norm Schwab, Council Central Staff
Bob Morgan, Council Central Staff
Keitel Freeman, Council Central Staff
Christa Valles, Council Central Staff
Michael Jenkins, Council Central Staff

Attachment: Record of Disclosures and Recusal regarding the Planning Commission review and recommendations provided to Seattle City Council UDP committee on 2007 Comprehensive Plan Amendments Threshold Resolution.

Record of Disclosures and Recusal regarding the Planning Commission review and recommendations provided to Seattle City Council UDP committee on 2007 Comprehensive Plan Amendments Threshold Resolution.

RE: Amendment referring to the Multifamily Zoning Update

- 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** he works for Heartland and they do work in multifamily zones.
- Commissioner Martin Kaplan **disclosed** he works for Martin Henry Kaplan Architects and they do work in multifamily zones.
- Commissioner Tony To **disclosed** that he is the Director of Homesight and that he works on affordable housing projects in multifamily zones.

Re: Amend Land Use policies to establish a priority for affordable housing among public benefits required to mitigate impacts of higher-density developments

- Commissioner Tony To **disclosed** that he is the Director of Homesight, a non profit housing developer.
- Commissioner Tom Eanes **recused** himself from all discussion on this matter and was not present for any Commission discussion.

RE: Amendment referring to Changes to Future Land Use Map to reflect City's preferred direction for redevelopment of 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.

RE: Amend Future Land Use Map to redesignate six parcels in the Madrona neighborhood as Commercial/Mixed Use.

- Commissioner Steve Sheehy **disclosed** that he lives in the Madrona neighborhood and is familiar with the property in question.
- Commissioner Tony To **disclosed** that he is the Director of Homesight and that Homesight works in the Madrona neighborhood to produce affordable housing.

RE: Amendment referring to Future Land Use Map – South Downtown

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

RE: Amendment referring to Future Land Use Map – South Lake Union

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

RE: Amendment referring to exempt an area of the Duwamish MIC from Size-of-Use Limits on Office Space

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

RE: Amend the Future Land Use Map to redesignate the proposed site of the Nordic Heritage Museum in the Ballard Hub Urban Village from Industrial to Commercial/Mixed Use.

- 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 from all discussion on this matter and was not present for any Commission discussion.

RE: Amendment referring to Prohibit Structured Parking on or Near Parks Property

- Commissioner Tom Eanes **disclosed** that his wife works for the Seattle Zoo and that his firm, Hewitt Architects, designed the garage.

Additional Commission Disclosures:

- Commissioner Mahlon Clements **disclosed** that his firm Zimmer Gunsul Frasca Partnership has had clients and might have clients that could be impacted by some of the amendments.
- Commission Chris Fiori **disclosed** that his firm, Heartland LLC, has had and might have clients who could be affected by the amendments.

****Please note that not some Commissioners were absent during the meetings when amendments were discussed and SPC recommendations formulated. In those instances the Commissioners were not present to formally disclose or recuse. For more details please see Seattle Planning Commission meeting notes for February 22, 2007; March 22, 2007 and April 12, 2007. In addition please note, the Planning Commission recommendation on the *Amendment referring to Zoned Brownfield's in Transitional Areas of the Duwamish Manufacturing Industrial Center*, that the Commission changed it's recommendation after the approved recommendations stated in the April 12, 2007 meeting notes because that proponent submitted a revised amendment. The Commission action to revise the SPC recommendation was done via email and the records are available upon request**