

(Date)

Honorable Councilmember Rob Johnson, Chair
Planning, Land Use, and Zoning Committee
via e-mail

Dear Councilmember Johnson,

The Seattle Planning Commission is pleased to provide our comments and recommendations on proposed 2017-2018 Comprehensive Plan amendments. Providing recommendations on annual Comprehensive Plan proposals is a mandate of the Commission and a responsibility we are pleased to fulfill as stewards of Seattle's Comprehensive Plan.

Proposed FLUM Amendments

Proposal: Seattle Pacific University

Planning Commission recommendation: Do Not Adopt

The applicant is requesting to remove 4.7 acres from the Ballard Interbay Northend Manufacturing and Industrial Center (BINMIC) to allow for expansion of Seattle Pacific University's Major Institution use onto industrial land. The Planning Commission does not recommend approval of this proposed amendment. The Commission has consistently recommended against removing land from a Manufacturing and Industrial Center (MIC) through a change to the Future Land Use Map (FLUM) in the absence of a broader industrial lands study resulting in revised policy. We strongly believe that removing industrial lands from a MIC would have significant cumulative impacts on important living wage jobs and the broader economy. We understand that this proposed amendment is unique among other similar FLUM changes that we have seen over the last several years because the University is not a private property owner requesting to change the land use designation of their property to a commercial, residential, or mixed-use designation. We also understand that the underlying land use designation would remain industrial and the University's campus expansion efforts would be subject to a separate Major Institution Master Plan process. However, we believe that this FLUM change could be perceived as setting a precedent for removing industrial lands from a regionally-significant MIC. Once industrial land is changed to another use, it will most likely never be returned to industrial use.

The Planning Commission would like to express its frustration with the lack of policy direction from the City regarding industrial lands. The Planning Commission has reviewed multiple proposed Comprehensive Plan Amendments related to industrial lands over the last several years, including repeat amendments from the same property owners. The Commission docketed several proposed FLUM changes in 2017 pending a response from the Mayor's Task Force on Industrial Lands. Resolution 31762 directed the Executive to *"provide recommendations of potential amendments to Comprehensive Plan policies related to industrial lands including policies to strengthen the long-term viability of Manufacturing/Industrial Centers and a re-evaluation of the Stadium District for Council consideration in 2018."* In the absence of any recommendations from the Mayor's Task Force on Industrial Lands or the Executive, the Commission has been and will continue to be consistent in our recommendations against removing industrial lands from the MICs. We look forward to reviewing policies that address all industrial-zoned areas once the Task Force's recommendations are translated into policy by City staff. At that time, it can be determined whether proposals such as this would be consistent with any policy changes relative to the BINMIC.

Proposed Amendments to Goals and Policies

Proposal: Impact fee amendments

Planning Commission recommendation: Adopt

In Resolution 31762, the Council requested that the Executive forward “*any amendments necessary to support implementation of an impact fee program for public streets, roads, and other transportation improvements...*” The Commission supports adoption of the proposed amendment enabling the development of a transportation impact fee program. We recommend approval of the proposed transportation project list as an appropriate representation of investments needed to implement the current Capital Improvement Program, the adopted transportation modal plans, and projects identified through the Move Seattle levy planning process that are not funded by the current levy. The Planning Commission recommends adding replacement of the 4th Avenue S. viaduct to the transportation impact fees project list. We look forward to providing input on the policy implications and the particulars of any proposed impact fee program in the future.

Proposal: Parking and affordable housing

Planning Commission recommendation: Adopt as revised

The applicant has submitted a proposed amendment that would revise Land Use Goal 6 to state that increasing affordable housing is a goal in setting parking requirements, rather than lowering construction costs as currently stated. The original text of the revised goal as proposed by the applicant is as follows:

LU G6: Regulate off-street parking to address parking demand in ways that reduce reliance on automobiles, improve public health and safety, reduce greenhouse gas emissions, ~~lower construction costs~~ increase affordable housing, create attractive and walkable environments, and promote economic development throughout the city.

The Office of Planning and Community Development (OPCD) has recommended maintaining the original text and adding language from the applicant’s proposal to make the goal clearer. The Commission recommends approval of the amendment as revised with OPCD’s suggested language as shown below:

LU G6: Regulate off-street parking to address parking demand in ways that reduce reliance on automobiles, improve public health and safety, reduce greenhouse gas emissions, lower construction costs to reduce the cost of and increase affordable housing, create attractive and walkable environments, and promote economic development throughout the city.

We appreciate the opportunity to review these Comprehensive Plan amendments and provide our recommendations. If you have any further questions please call either me or Vanessa Murdock, Seattle Planning Commission Executive Director at (206) 733-9271.

Sincerely,

Tim Parham, Chair
Seattle Planning Commission

cc:

Mayor Jenny Durkan
Seattle City Councilmembers
Sam Assefa, David Driskell, Michael Hubner, Kristian Kofoed; Office of Planning and Community Development
Ketil Freeman, Eric McConaghy, Lish Whitson; Council Central Staff

SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURES & RECUSALS:

revised draft