

(Date)

Honorable Councilmember Dan Strauss, Chair  
Land Use and Neighborhoods Committee  
*via e-mail*

RE: 2020-2021 Comprehensive Plan Amendment Recommendations

Dear Councilmember Strauss,

The Seattle Planning Commission is pleased to provide our comments and recommendations on which proposed 2020-2021 Comprehensive Plan amendments should be adopted as part of the annual update process. 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.

**The Planning Commission recommends adopting the following amendment proposals:**

Proposed Future Land Use Map (FLUM) Amendment: Extend the University District Urban Center

The applicant is requesting to extend the boundary of the University District Urban Center to include the half block of adjacent land bounded by 15th Avenue NE to the east, NE Ravenna Avenue to the north, NE 56th Avenue to the south, and an alley that is the boundary to the University District Urban Center to the west. This proposed amendment would change the FLUM designation from Multi-Family Residential to University District Urban Center.

The area is currently zoned LR3 and consists of predominantly multi-family structures. Expansion of the University District Urban Center boundary to include this area will result in a slight increase of development capacity above its current designation. The applicant is seeking inclusion of the subject area in the Urban Center to provide future redevelopment options and has indicated an interest in applying for a contract rezone to a zoning designation with an M suffix to provide Mandatory Housing Affordability (MHA) affordable housing benefits. Applying an M suffix to the zone means that any future project would need to provide some affordable housing as part of the development or make a fee contribution to affordable housing.

The Planning Commission supports amending the FLUM to expand the boundary of the University District Urban Center and change the designation from Multi-Family Residential to Urban Center. The Comprehensive Plan defines Urban Centers as the densest Seattle neighborhoods. They act as both regional centers and local neighborhoods that offer a diverse mix of uses, including housing and commercial activities. These areas provide a mix of goods, services, and employment for their residents and surrounding neighborhoods. This amendment meets the goals for an Urban Center of promoting dense, mixed-use, walkable communities.

The Commission also recommends adoption of this amendment due to the proximity of the proposed expansion area to high-frequency transit. The location of the proposed FLUM change is approximately

0.5 miles from Sound Transit's new U District station on the North Link line, with service anticipated in October 2021, and frequent bus service is provided a half block away on University Way NE.

### 130th Street Station FLUM and Text Amendments

This proposal would amend the FLUM and Comprehensive Plan text to encourage denser, transit-oriented development in an area immediately adjacent to the proposed 130th Street Link light rail station. The proposed FLUM amendment affects 8.4 acres immediately east of the station site. The FLUM amendment would change the future land use designation of the subject area from Single-Family Residential to Multi-Family Residential and Commercial/Mixed Use. Proposed text amendments to the Comprehensive Plan would extend the criteria for designating Multi-Family Residential and Commercial/Mixed Use land uses to station areas, such as this one, that are outside of Urban Villages.

Sound Transit is currently constructing Lynnwood Link, which will extend light rail service from the University of Washington to Lynnwood. The Sound Transit 3 plan includes a light rail infill station at 130th Street. Originally planned for construction by 2031, the timing of this station is unclear at this time due to the Sound Transit Board's ongoing realignment process. The Board will make a final decision about the schedule for completing and opening the 130th Street Station in 2021.

The Office of Planning and Community Development (OPCD) has engaged in a long-range planning effort for areas surrounding both the 130th Street station and light rail and bus rapid transit (BRT) investments along the 145th Street corridor to the north. Station area planning focuses on the area generally within a half mile (about a 10-minute walk) of a planned light rail station or a quarter mile (about a 5-minute walk) of a BRT station. This work includes studying a range of potential land use changes and policy options that support transit-oriented development. This amendment would serve as an initial implementation of the station area plan by making land use and policy changes to allow multi-family and mixed uses on 8.4 acres of land adjacent to the proposed 130th Street light rail station.

Existing Comprehensive Plan land use policies are supportive of the kind of transit-oriented development proposed by this FLUM amendment but restrict such use designations to Urban Centers and Urban Villages. This area does not currently meet Comprehensive Plan policies for the proposed Multi-Family Residential and Mixed Use/Commercial land use designations. The policy text amendments are necessary to facilitate the FLUM amendment and would expand the criteria for these land use designations to include areas near any transit station, including outside of Urban Centers and Urban Villages.

Below are the proposed text changes to policies in the Growth Strategy and Land Use elements (proposed changes are underlined):

GS 1.7 Promote levels of density, mixed-uses, and transit improvements in urban centers and villages, and other residential and commercial areas near future light rail stations that will support walking, biking, and use of public transportation.

- GS 3.20 Consider taller building heights in key locations to provide visual focus and define activity centers, such as near light rail stations in urban centers and urban villages and other residential and commercial areas near future light rail stations.
- LU 8.4 Establish evaluation criteria for rezoning land to multifamily designations that support the urban village strategy and transit-oriented development, create desirable multifamily residential neighborhoods, maintain compatible scale, respect views, enhance the streetscape and pedestrian environment, and achieve an efficient use of the land without major impact on the natural environment.

The Planning Commission recommends adopting the 130th Station Area FLUM amendment and related text amendments. These amendments demonstrate the City's commitment to transit-oriented development by encouraging transition of key parcels directly adjacent to the station from existing single-family use to transit supportive, higher density residential and commercial uses. In addition to the proposed FLUM and text amendments, the Planning Commission strongly supports ongoing study of a broader set of FLUM changes and rezones for the full station area. In 2020, the Commission expressed its support for a separate docketed amendment to establish an Urban Village around the planned 130th Street Link Light Rail Station, which would facilitate increased capacity for transit-oriented development and associated amenities. We continue to support this proposal and will look forward to the opportunity to provide our input and feedback on any future Urban Village alternatives for the 130th Street Station area at the appropriate time.

#### Industrial Land Comprehensive Plan Amendments

Mayor Durkan recently announced the final Industrial and Maritime Strategy recommendations. The eleven recommendations address land use, workforce development, transportation, the environment, and public safety. A new land use framework that implements the recommended land use strategies will be studied in an Environmental Impact Statement (EIS). These proposed Comprehensive Plan text amendments represent the first of two implementation actions of the Industry and Maritime Strategy relating to land use. Following completion of the EIS in 2022, OPCD will propose additional amendments to the Comprehensive Plan creating a new industrial land use framework and an ordinance that implements this framework by amending the zoning map and revising development regulations.

Two Comprehensive Plan text amendments are recommended for adoption in 2021:

1. A new policy that limits any FLUM amendment that takes land out of a Manufacturing/Industrial Center (M/IC) to either be adopted as part of a major update to the Comprehensive Plan or as the result of a comprehensive study of industrial lands that evaluates changes to industrial land designations within the context of the overall policy objectives for and supply of the City's industrial land in M/ICs.
2. A new policy that signals the City's intent to consider any changes in land use on the Washington State National Guard Armory in Ballard-Interbay-Northend M/IC (BINMIC) and

the WOSCA site in the Greater Duwamish M/IC through a master planning process for industrial redevelopment of these sites.

Below are the proposed text changes to policies in the Land Use element (proposed changes are underlined):

- LU 10.3 Ensure predictability and permanence for industrial activities in industrial areas by limiting removal of land from a designated manufacturing/industrial center. There should be no reclassification of industrial land to a non-industrial land use category except as part of a City-initiated comprehensive study and review of industrial land use policies or as part of a major update to the Comprehensive Plan.
- LU 10.24 Recognize the unique development opportunities that the Washington National Guard Armory in the BINMIC and the WOSCA site in the Greater Duwamish MIC represent. Work with the State of Washington and Washington State Department of Transportation or other future owners of these sites to develop a comprehensive redevelopment plan that maximizes public benefits and reflects its location within a manufacturing/industrial center. Goals for these plans include features such as green infrastructure, district energy and waste management programs, and workforce equity commitments.

The Planning Commission strongly supports strengthening protections for industrially zoned lands within Seattle by establishing higher thresholds to remove industrial land designations and eliminating the potential to remove land from the M/ICs during the annual Comprehensive Plan amendment process. We have reviewed several Comprehensive Plan amendment applications in recent years requesting changes to industrial designations to allow other uses. We have consistently expressed our support for maintaining the M/IC boundaries and opposition to encroachment by other uses. In addition to the intent of this amendment, we also support removing existing zoning loopholes, especially for auto-dependent uses such as big box stores, storage facilities, strip commercial development, and surface parking lots. Interim strategies should be implemented for stronger protection of industrial land while the broader strategies are being analyzed and considered for adoption. We recommend interim land use actions to close existing loopholes in the zoning code until major changes are adopted.

The Planning Commission has not been briefed in recent years on any development plans for the WOSCA site specifically but has reviewed a proposed amendment to the Comprehensive Plan for creation of a Stadium District that would include this site. We look forward to learning more about this site as the master planning process evolves. The Commission followed the recent stakeholder advisory committee process for the future of the Interbay Armory site currently owned by the State. The southern portion of the Ballard/Interbay/Northend M/IC has seen a significant amount of development in recent years including big box stores, storage facilities, and other auto-dependent commercial uses. The Commission encourages the City to ensure that the master planning process for the Armory site does not allow any additional uses of this type. Sound Transit's Ballard Link Extension project proposes to locate two future light rail stations in Interbay less than a mile apart. The Armory

site is within the watershed of both future light rail stations. The Planning Commission will review station area plans for these stations and will pay particular attention to any plans for the Armory site. We encourage environmental review to consider a range of significant issues including public health impacts related to the site's proximity to an active rail yard, liquefaction risk, sea level rise impacts, and emergency access during a tsunami.

**The Planning Commission recommends the following amendment proposals not be adopted:**

Trees

The City received two applications to amend policies related to trees, tree protection, and urban forest canopy in the Comprehensive Plan. While similar to amendment applications that were considered and either not approved or not docketed in previous years, these were docketed by the City Council for further consideration. The proposed amendments to protect tree canopy were analyzed by OPCD but not recommended for adoption. It is our understanding that OPCD is working with the Seattle Department of Construction and Inspections (SDCI), Office of Sustainability and Environment (OSE), and the Urban Forestry Commission to update the City's Urban Forestry Plan which takes a comprehensive look at programs and policies that will expand and sustain Seattle's urban forest. Following final adoption of the Urban Forestry Plan, OPCD will work with OSE and the Urban Forestry Commission to identify how the plan can be supported by amendments to the Comprehensive Plan as part of the 2024 major update. The Planning Commission looks forward to the opportunity to review future policies related to the protection of trees, tree canopy, and the urban forest. This natural infrastructure provides critical benefits to the resilience and livability of our city.

**Docketed Amendments Not Analyzed by OPCD**

Of the proposed Comprehensive Plan amendments that were docketed by the City Council in Resolution 31970 for further analysis, the following five were not analyzed or recommended by OPCD as part of the 2020-2021 annual amendment cycle:

- Amendments related to the West Seattle Bridge
- A new name for Single-Family areas
- Designation of the South Park Urban Village
- Amendments related to fossil fuels and public health
- Impact fee amendments

West Seattle Bridge

The applicant proposed to amend City policies to assist in mitigating the emergency closure of the West Seattle High Bridge. At the time the proposed amendments were docketed, the closure of the bridge was anticipated to be much longer than it ultimately will be. Shortly after docketing this amendment, it was announced that the bridge would only be closed for three years. OPCD did not see a need to conduct the review described in the docketing resolution because of the relatively short period between adoption of any potential amendments and return of the bridge to service. The need to

amend the Comprehensive Plan to identify mitigation related to the closure was determined to be unnecessary.

#### Alternative Name for Single-Family Zones

We fully support the City Council proposed amendment to replace the term “Single-Family Area” with “Neighborhood Residential Area” in the Comprehensive Plan Future Land Use Map, relevant elements in the plan, neighborhood plans and appendices.

The name ‘Single-Family’ zoning has been a misnomer since 1994 when the city passed Accessory Dwelling Unit legislation allowing two households to live on a Single-Family zoned parcel and is not representative of the households that currently live in those zones. This name is also linked to Seattle’s former use of race-based zoning as an exclusionary practice. The Commission applauds and supports the City Council in the proposed amendment that would recommend changing the name of the zoning earlier than the Major Update. This change could also serve to inform the policy process considering alternatives to Single-Family zoning.

The Planning Commission has been a consistent advocate for reexamining Seattle’s land use policies to expand the range and affordability of housing choices. Our 2018 *Neighborhoods for All* and 2020 *A Racially Equitable & Resilient Recovery* reports both emphasized the benefits of allowing more housing and increasing housing choices in Single-Family zones. The Commission applauds the City Council for forwarding this amendment and strongly supports its adoption. We encourage alignment and coordination between the Council and the Executive in moving forward with this amendment.

#### South Park Urban Village Designation

The City Council proposed an amendment to assess how the South Park neighborhood meets the criteria for Urban Village designation. OPCD has stated that an effort to determine whether the South Park neighborhood should be designated as an Urban Village is more appropriately addressed as part of the Major Update to the Comprehensive Plan. OPCD expects to review the Urban Centers and Villages Growth Strategy during that effort. The Planning Commission is supportive of a comprehensive review of the City’s Urban Centers and Urban Villages. If an effort to review the South Park Urban Village moves forward, the Commission strongly recommends that community members and the relevant stakeholders are engaged throughout that process. We look forward to providing our input and feedback at the appropriate time.

#### Fossil Fuels and Public Health

The City Council has requested that OPCD, in consultation with SDCI, OSE, and the Environmental Justice Committee, draft potential amendments to the Environment, Land Use, or Utilities Elements that would clarify the City’s intent to protect public health and meet its climate goals by limiting fossil fuel production and storage. OPCD has stated that the level of analysis to effectively identify and evaluate potential amendments is more appropriate for the Major Update to the Comprehensive Plan. The Planning Commission is generally supportive of goals and policies to reduce the impacts of climate

change, including any strategies to reduce the use of fossil fuels. We will look forward to the opportunity to review such amendments in the future.

Impact fee amendments

The City Council has requested potential amendments to Comprehensive Plan policies necessary to support implementation of an impact fee program for public streets, roads, and other transportation improvements; publicly owned parks, open space, and recreation facilities; and school facilities. The Planning Commission received a briefing on a proposed Comprehensive Plan Amendment related to transportation impact fees in October 2018. We understand that the State Environmental Policy Act (SEPA) analysis of that proposed amendment was appealed to the Hearing Examiner and this amendment is now subject to ongoing City Council consideration. The Commission will look forward to the opportunity to review this amendment if/when it moves forward.

We appreciate the opportunity to provide our recommendations on the 2020-2021 Comprehensive Plan Amendments. If you have any questions, please do not hesitate to contact Vanessa Murdock, Seattle Planning Commission Executive Director.

Sincerely,

Rick Mohler and Jamie Stroble  
Co-Chairs, Seattle Planning Commission