Director's Report
Periodic Update combined with
2014 to 2015 Amendments to the Seattle Comprehensive Plan

Department of Planning and Development

June 2015

Dear Reader:

This report provides analysis and recommendations on the proposals received for amending the Comprehensive Plan in the 2014-2015 annual amendment process as well as amendments identified as necessary as part of the City's periodic Plan update.

This year the annual amendment proposals came from interested residents and City departments. Upon reviewing the proposals received, City Council adopted Resolution 31536 in 2014 defining which amendment proposals would receive further analysis this year. This report provides the results of that analysis and the Mayor's recommendations regarding the proposals.

In addition to the amendments identified in that resolution, the Mayor is recommending a set of amendments to meet the City's obligation under the State Growth Management Act and other requirements.

Accompanying the report is the Mayor's proposed ordinance for the amendments he recommends for adoption.

The City Council will schedule a public hearing on the ordinance in 2015.

You may send comments on the ordinance to:

Councilmember Mike O'Brien
City Hall
601 5th Avenue, Floor 2
PO Box 34025
Seattle, WA 98124-4025

You may also email City Council staff at complan@seattle.gov or Kristian Kofoed of DPD at kristian.kofoed@seattle.gov.

Sincerely,

Diane M. Sugimura,

Director

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City of Seattle
2015 Annual Comprehensive Plan Amendment

Director's Report

INTRODUCTION

This report describes the Mayor's recommended 2015 amendments to the City's Comprehensive Plan ("Plan"). The Plan is a requirement of the state Growth Management Act (GMA). The Plan is a policy document that guides City actions for managing 20 years of expected growth. Because the GMA limits the City to amending the Plan once a year, Seattle bundles amendments for the City Council to consider on an annual basis.

This year's recommended amendments include two categories of actions:

1) Proposed Amendments that have been identified through Resolution 31356 as part of the City's annual amendment process.
2) Amendments relating to the GMA-mandated Periodic Update of the Plan.

SUMMARY OF RECOMMENDATIONS

Amendments as part of the annual amendment process

The proposed amendments include the following:

- Modify the Central Area Neighborhood Plan and make associated changes to the Future Land Use Map (FLUM).
- Modify the Morgan Junction Neighborhood Plan and make associated changes to the FLUM.
- Modify the North City Neighborhoods (Lake City) Neighborhood Plan and make associated changes to the FLUM.

Periodic Update Amendments

The amendments identified as needed through the Periodic Update of the Plan include incorporating current demographic data, inventories, analyses and forecasts of growth in development and employment. In addition, the recommended amendments address state

requirements relating to environmentally critical areas (ECA). Low impact development (LID) policies are revised to address requirements of the City's federally-mandated National Pollutant Discharge Elimination System (NPDES) permit. More specifically, the proposed amendments to the Plan include:

- *Update the planning horizon and 20-year growth estimates.* The existing Plan includes previous estimates of 47,000 households and 84,000 jobs for the 20-year planning period from 2004 to 2024. The amendments adopt new growth estimates for the period 2015 to 2035 of 70,000 housing units and 115,000 jobs. These growth estimates were developed by the King County Growth Management Planning Council, based on state and regional forecasts.
    - *Revise policies and data describing the new growth in Seattle* and update information about the infrastructure necessary for the citywide growth. In addition to the changes in the citywide growth estimates, the amendments revise how those city-wide estimates are distributed to the six urban centers and two manufacturing/industrial centers.
- *Revisions to the Appendices.* Proposed amendments generally update inventories and future needs from the 2004 major update to the Plan.
    - As a consequence of the new growth estimates and other State requirements and County policies, the recommended amendments revise relevant policies to reflect the new growth estimates and planning horizon in the following Elements: Urban Villages, Land Use, Housing and Economic Development and updates in data and analysis as needed in the following Appendices: Urban Villages, Capital Facilities, Utilities, Transportation, Land Use, Housing and Economic Development.
    - Additional changes include revisions to the Transportation Appendix to update transportation expenditures and revenues and, in the Transportation Element, removal of out-of-date references and general clarification.
- *Amend Housing Element* goal HG1 and delete Housing Policy H30 to reflect the revised approach in the 2012 King County Countywide Planning Policies for determining the share of the need for affordable housing the City will accommodate.
- *Revise Low-Impact Development (LID)* policies (Environment Element) to address requirements of the City's federally-mandated stormwater permit.

- *Update and clarify Environmentally Critical Area (ECA)* policies (Land Use Element) that protect the function and values of critical areas consistent with best available science.

BACKGROUND

Seattle's Comprehensive Plan

The City first adopted the Plan in 1994. The first major update in 2004 extended the Plan's horizon to 2024 and planned for revised growth estimates at that point in time. The State of Washington Growth Management Act (GMA) requires urbanized counties and cities to adopt a plan to manage expected growth. Various aspects of growth are to be governed by policies in Plan chapters (called "Elements") addressing land use, transportation, housing, capital facilities, utilities, and (for Seattle and Tacoma) container ports. Seattle has also elected to include elements related to urban villages, economic development, neighborhood planning, human development, cultural resources and the environment.

Annual Amendment Process

The City has amended the Plan most years since it was first adopted. Each year the City allows individuals, groups, elected officials and City departments to propose amendments, typically to address changing conditions, ongoing work, new policy direction or new information. The Council then follows a two-step process. In the first step, the Council decides which of the suggested amendments should be examined further and adopts a resolution directing DPD to analyze those. After DPD completes its analysis, it recommends specific amendments for the Council's consideration. The second step is for Council to review the Executive and Planning Commission's recommendations, hold a public hearing and adopt an ordinance amending the Plan.

In 2014, the Council received several proposed amendments to the Plan. The Council adopted Resolution 31536 to identify those that DPD should further analyze. The relevant parts of this Report and Ordinance conclude the first step and reflect the Executive's recommendations as to which proposals should be considered by Council in the second step.

Periodic Update: GMA-Mandated Review and Update of the Plan

The GMA requires that Seattle and other cities in King County review and, if necessary, update their plans periodically. The GMA cites a number of necessary components, and the state Department of Commerce has provided guidance about content that needs to be included in an updated Plan. The Executive's review of the current plan did not identify a need to modify

significant portions of the policy direction contained in the Plan. Instead, the review emphasized updating specific sets of data and inventories, based on the expected population and employment growth anticipated in the city over the next 20 years.

RECOMMENDED AMENDMENTS

This section provides additional detail regarding the recommended Plan amendments.

Amendments proposed as part of the Annual Amendment process

Neighborhood Plan-Related Amendments
DPD recommends amendments to specific policies in three neighborhood plans in the Neighborhood Planning Element. These plans are Morgan Junction, Central Area (23rd Ave S. @ S. Jackson-Union), and Lake City. The recommended policy amendments are accompanied by changes to the Future Land Use Map (FLUM).

- **Central Area** (23rd Ave S. @ S. Jackson-Union)
  DPD recommends adding a new neighborhood plan policy to support changes to the Single-Family FLUM designation of a small area. (See the Attachments at 7(a) for the recommended amendments.) A technical correction to the map within the neighborhood plan is also proposed.

  DPD also recommends modifying the FLUM to expand the boundary of the urban village to include a small area at 21st and Union and also to modify the designation of another small area within the urban village from Single Family Residential to Commercial/ Mixed Use. These neighborhood plan amendments reflect community input over the past year through DPD's planning process. Together, the policy and FLUM amendments set the stage for a legislative rezone, generally within areas characterized by multi-family and/or neighborhood-serving retail development and uses. These rezones reflect discussions with the community over the past three years. (See Attachment 1-A for the proposed map amendments.)

- **Morgan Junction**

  DPD recommends creating an exception to an existing policy prohibiting all rezones from single-family zoned parcels. (See Attachment 7-B for the recommended policy amendment.)

A related FLUM amendment would change the designation of a small area within the Urban Village from single-family to multi-family. The FLUM amendment was proposed by the owner of the affected property and there is community support for the amendment. If adopted, the plan and FLUM amendments would enable the property owner to apply to rezone the property to a lowrise multifamily zone. (See Attachment 1-B for the recommended map amendment.)

- **Lake City**

  DPD recommends amendments to the neighborhood plan that reflect community input gathered through DPD's planning process over the past year. The amendments show the community's priority of pedestrian safety over retention of driveways on Lake City Way; delete a reference to an obsolete section of the Land Use Code; clarify that the desire for concentrating non-residential street-level uses applies in the pedestrian-designated area; and allow for higher structure height near the civic core. (See Attachment 7-C for the recommended policy amendments.) The area around the Lake City community center and library is considered to be the civic core of the neighborhood.

  The FLUM amendment would change the designation of a small area within the civic core from Multifamily to Commercial/Mixed-Use. (See Attachment 1-C for the recommended map amendments.) This change, and the text change to NN-P39, would allow rezones to a small number of parcels. The intent of the rezones is to allow a modest expansion of the business district to the west and strengthen pedestrian connections between the civic core and Virgil Flaim Park.

- **Urban Village Element (Figure 1)**

  The proposed FLUM change to the 23rd Ave S. @ S. Jackson-Union Urban Village boundary (to include the small area around 21st and Union) require an amendment to Figure 1 in the Urban Village Element, which is a map showing the location and boundaries of all the urban centers and urban villages.

Periodic Update Amendments

DPD recommends the following amendments to update the Comp Plan, primarily by accepting the growth estimates for the 2015-2035 planning horizon. The recommendations are organized by Plan Element.

Urban Village Element (Attachment 2) and Appendix (Attachment 9)

The Plan needs to be updated to incorporate a new 20-year planning horizon, along with new citywide growth targets mandated by the King County Countywide Planning Policies. The current Plan covers the period 2004-2024. The updated Plan will address the period 2015-2035. Over that period, the City is planning for 70,000 additional housing units and 115,000 additional jobs. (See Attachment 2 for the recommended policy amendments for the Urban Village Element and Attachment 9 for the recommended amendments to the Urban Village Appendix.)

The current Plan assigns growth targets to all of the individual urban centers and urban villages. GMA does not require the City to either designate urban centers and villages or to assign specific growth amounts to them. However, Vision 2040, the growth strategy for the four-county region including Seattle, identifies Seattle's six urban centers and two manufacturing/industrial centers (M/ICs) as key locations in the regional strategy. Vision 2040directs the City to assign growth targets or growth estimates to these centers.

The City is still evaluating whether and how to assign targets to all urban villages, and anticipates considering this further as part of a different planning process, *Seattle 2035,* whereby the *Seattle 2035* EIS[1] will consider various growth distributions. Consequently, the present set of amendments assigns targets to the urban centers and M/ICs, but not to the hub and residential urban villages. Not having targets in the Plan for urban villages at this time necessitates a number of changes to policies that reference those targets.

Specific changes include edits or deletion of several goals or policies, revisions to Figure 8 in the Urban Village Element and minor edits to language in the Discussion section.

[1] *Seattle 2035* is a separate planning process that began in 2013 and Council is expected to act on in 2016. *Seattle 2035* is an effort to take a wide-ranging look at the Comp Plan to incorporate principles of equity, consider various growth distribution options that may vary from the long-standing urban village strategy, and utilize clearer, more user-friendly language. The *Seattle 2035* process includes preparation of an Environmental Impact Statement (EIS) that will examine the potential for impacts from decisions about various growth distributions.

The existing language in Urban Village Goal (UVG) 32 states that the City will encourage growth to be distributed according to proportions shown in Figure 8, which lists the percentages of housing and job growth intended in each type of center and urban village (urban center, manufacturing/ industrial center, hub urban village and residential urban village) for the period 2004 to 2024. The City adopted these percentages as part of the 2004 update to the Plan, based on the amount of growth expected over the 20-year period.

The recommended amendments to UVG32 replace that language with a reference to the new growth estimates -- 70,000 housing units and 115,000 jobs between 2015 and 2035. DPD recommends revising Figure 8 to show future growth estimates for the six urban centers and the two M/ICs.

The City has evaluated the new population and job projections and concluded, in a September 2014 Development Capacity Report, incorporated herein by reference, that the City already has sufficient zoned land to accommodate the 2035 population and job projections. That report describes the current zoned capacity to absorb housing and employment by zoning designation, and by urban center and village. Based on that report, the new growth estimates for urban centers contained in the revised Figure 8 can all be accommodated by the current zoning. Continued public engagement and analysis associated with the *Seattle 2035* process could lead to modifications to these growth estimates as part of the amendments Council would consider in 2016 and further changes to Figure 8.

DPD also recommends deleting Urban Village Appendix A. That appendix is a table that lists for each urban center and village the land area, 2004 housing unit and job totals, 20-year growth targets, and the current (2004) and expected 2024 densities. This information is not a specific requirement of the Growth Management Act, but has historically been included in the Plan to demonstrate the City's assumptions about how much growth to plan for in each center and village. Because the City is still evaluating alternative patterns of distribution in villages or in other areas, it is not yet possible to show the projected growth for all these particular locations. Urban Village Appendix B is renumbered to reflect the deletion of Urban Village Appendix A.

There are several other policies that refer to growth targets for individual villages that must also be amended or removed. For instance, policies UV3, UV13 and UV41 currently refer to the need to provide zoning that would accommodate the growth targets. Because growth targets for individual villages are not included in this set of amendments, the references to village targets create the potential for confusion. Therefore, DPD recommends modifying language in those policies to reflect the need for appropriate zoning, without linking that zoning to particular targets.

Policies UV40, UV42, and UV43 provide descriptions about how to use and interpret growth targets for urban villages. Because growth has not yet been allocated to specific urban villages, DPD recommends revising or deleting these policies create the potential to avoid confusion. UV 43 (renumbered from UV 46) refers to existing parks and open space goals in the UV Appendix. The City plans to add an "Open Space" Element to the Comprehensive Plan as part of Seattle 2035, and, as part of that effort, is conducting additional analysis of parks and open space acquisitions.

Policy UV45 describes a process for monitoring growth in urban villages over time and for responding to significant variation from growth estimates for individual villages. The recommended revision to this policy would remove the need to compare growth in villages to estimates.

Land Use Element (Attachment 3) and Appendix (Attachment 10)

DPD recommends modifying several ECA policies to clarify their intent and reflect current best-available-science for critical areas. These amendments include adding the ECA protection to peat settlement-prone areas and identifying areas of seismic and volcanic hazards. A new policy would promote both public and private opportunities to improve environmentally critical areas.

GMA directs that the Plan include population densities, intensity of commercial development and estimates of future population growth. The Land Use Appendix currently contains maps and tables showing these and other aspects of the City's development pattern. Some of the current tables display information by "districts" that represent a historic way of viewing subareas of the city and that do not correspond to any systematic way of organizing citywide data now in common use. DPD recommends updating this data to present it by urban centers and urban villages, reflecting the Plan's emphasis on those areas, and providing more specific information about existing land area occupied by specific uses and population and housing per acre within those urban center designations.

Transportation Element (Attachment 4) and Appendix (Attachment 11)

This Element currently references specific functional documents that Seattle's Department of Transportation (SDOT) prepared and maintains. In 2015, SDOT intends to incorporate the content of these documents into other functional transportation plans. Some current policies also address former SDOT practices no longer relevant to the Plan. For example, the recommendations would remove language referring to the Transportation Strategic Plan (TSP). The TSP has largely been replaced by a series of mode-specific plans addressing movement by pedestrian, bicycle and transit. As another example, Policy T13 refers to a set of "street types,"

which SDOT intends to modify and incorporate in the Right-of-Way Improvement Manual. The amendment corrects the reference by removing those street types from this Element.

GMA requires inventories of existing transportation facilities and "[f]orecasts for at least ten years based on the adopted land use plan to provide information on the location, timing, and capacity needs of future growth." The amendments update the inventories with current information. The updated Transportation Element and Appendix will include forecasts of volume, capacity, and desired levels-of-service related to the new growth estimates. The Element also updates revenue and expenditure figures to show that the transportation infrastructure necessary to serve the new growth can be funded . Supplemental inventory information is also provided in the Appendix.

Economic Development Element (Attachment 6) and Appendix (Attachment 15)

DPD recommends amending Goal EDG1 to reflect new job growth estimates as follows:

> EDG1 Add approximately ((~~84,000~~)) 115,000 jobs in the city over the 20-year period covered by this Plan, in order to ensure long-term economic security and social equity to all Seattle residents.

The main content of the Economic Development Appendix is a table showing the expected growth of jobs by industry sector for the period 2002 to 2024. The recommendation is to delete this table and its accompanying text. Based on further analysis as part of Seattle 2035, this table could be updated with new information for the 2016 Plan amendments.

Capital Facilities and Utilities Appendices (Attachments 13 and 14)

As required by GMA, DPD's recommended amendments update these Appendices to reflect that public facilities, including the City and the Seattle School District, can accommodate the new growth estimates.

Housing Element (Attachment 5) and Appendix (Attachment 12)

DPD recommends updating Housing Goal HG1 and removing Housing Policy H30 in the Housing Element to acknowledge the revised 20-year housing growth assumption and to reflect policy language related to affordable housing that is consistent with the 2012 King County Countywide Planning Policies (2012 KC CPPs). Note: there is a separate but concurrent legislative proposal that contains other Comprehensive Plan amendments generally related to affordable housing. An additional separate proposal may also be considered in 2015 that contains other Comprehensive Plan amendments -- generally related to neighborhood-specific policies in the

University District -- which have been evaluated in the University District Urban Design EIS. These other separate comprehensive plan amendments are not necessary as part of the periodic update under the Growth Management Act but may be adopted in 2015 concurrently with the amendments recommend in this Director's Report.

Environment Element (Attachment 8)

DPD recommends amending existing policies relating to low-impact development in order to address a condition of the City's permit under the National Pollutant Discharge Elimination System that is part of the federal Clean Water Act. Two policies would be amended, as follows:

> **E**8.1 ((~~Where there would be measurable benefits to people or wildlife, place priority on solving drainage problems, such as flooding and frequent reliance on the combined sewer overflow system, with natural drainage system approaches and by restoring watershed elements such as forest, wetlands, and natural channels.~~)) Use trees, vegetation, natural drainage systems, amended soil, environmental restoration, and other low impact development techniques, where feasible, to mitigate drainage problems, such as flooding and combined sewer overflows and to reduce the impacts of development.
>
> **E**10 Strive to increase the amount of permeable surface and vegetative cover in the city ((~~in order to mitigate the heat island effect of developed areas, control storm water flows and reduce pollution.~~)) , and to remove unnecessary impervious surfaces.

Proposals included in Council's Docketing Resolution and Not Recommended for Adoption

DPD staff recommends the following three docket items not move forward for adoption at this time:

1. The FLUM amendment proposed by the YWCA has been withdrawn by the proponent.

2. A proposal by King County would have amended the Land Use Element to allow height limits to be varied for public facilities to enable taller structures on the site currently housing the King County Juvenile Justice Center. This amendment has been withdrawn by the proponent.

3. DPD recommends deferring to the *Seattle 2035* process an amendment identified in this year's docketing resolution that would modify the Urban Village element's policies related to monitoring growth. The *Seattle 2035* process will consider a broad array of

changes to the Plan, and it is a more appropriate document for modifying the City's approach to monitoring changes associated with the Plan. As part of *Seattle 2035*, the Mayor will consider plan amendments about monitoring growth in urban centers and villages.

KEY TO ORDINANCE ATTACHMENTS

Attachment 1-A: Current and proposed FLUM: Central Area/23rd Ave. S. @ S. Jackson-Union Residential Urban Village

Attachment 1-B: Current and proposed FLUM: Morgan Junction Residential Urban Village

Attachment 1-C: Current and proposed FLUM: North Neighborhoods (Lake City) Hub Urban Village

Attachment 2: Urban Villages Element

Attachment 3: Land Use Element

Attachment 4: Transportation Element

Attachment 5: Housing Element

Attachment 6: Economic Development Element

Attachment 7-A: Neighborhood Planning Element Central Area/23rd Ave S. @ S. Jackson-Union Neighborhood Plan (Attachment 7-A(1) changes Plan language; Attachment 7-A(2) changes the FLUM)

Attachment 7-B: Neighborhood Planning Element Morgan Junction Neighborhood Plan (Attachment 7-B(1) changes Plan language; Attachment 7-B(2) changes the FLUM)

Attachment 7-C: Neighborhood Planning Element North Neighborhoods (Lake City) Neighborhood Plan (Attachment 7-C(1) changes Plan language; Attachment 7-C(2) changes the FLUM)

Attachment 8: Environmental Element

Attachment 9: Urban Villages Appendix

Attachment 10: Land Use Appendix

Attachment 11: Transportation Appendix

Attachment 12: Housing Appendix

Attachment 13: Capital Facilities Appendix

Attachment 14: Utilities Appendix

Attachment 15: Economic Development Appendix