



# City of Seattle

## Planning Commission

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September 15, 2008

Honorable Councilmember Sally J. Clark  
Chair, Planning, Land Use and Neighborhoods Committee  
Seattle City Council  
PO Box 34025  
Seattle, WA 98124-4025

### **RE: Recommendations for 2008 Comprehensive Plan Amendments**

Dear Councilmember Clark,

The Seattle Planning Commission is an independent volunteer body that advises City officials on broad goals, policies and plans for the physical development of the city. As the steward of Seattle's Comprehensive Plan, the Commission is pleased to provide you with our comments and recommendations on the proposed 2008 Comprehensive Plan Amendments.

### **RECOMMENDATIONS REGARDING PROPOSED 2008 AMENDMENTS**

#### ***A. Re-connecting First Hill and Capitol Hill to Downtown Over I-5***

##### **Recommendation and Comments: APPROVE**

We support better community connections, especially for cyclists and pedestrians. Lids have the possibility of creating a more hospitable environment for pedestrians and cyclists.

The proposed language could be easily expanded to allow for future lidding opportunities in a broader geography of the city. We support broadening the language to that effect.

We caution that the construction of a lid might limit future capacity expansion of I-5 or more importantly, future expansion of transit along the I-5 corridor. Any lid construction over I-5 should consider capacity in the context of regional north-south trips, especially if a broader corridor wide strategy is implemented in the viaduct replacement plan. Expansion of the transit system/TDM may not be sufficient to deal with the north-south traffic.

Any future lid construction over I-5 should preserve this important federally designated NAFTA freight route and preserve Seattle's attractiveness as a port city.

***B. Change the Future Land Use Map designation of land within the Downtown Urban Center from Industrial to Commercial Mixed Use***

**Recommendation and Comments: DEFER TO 2009**

The Commission has been concerned about rezoning industrial land to another designation. 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. In regard to this proposed amendment we note the following:

- We find that a clear public policy rationale was articulated and has merit. The public policy rationale outlined by DPD staff is as follows: this amendment is looking at a limited number of parcels of IC 65 zoned land and all of the parcels in question lie outside the Duwamish Manufacturing/Industrial Center and inside the Chinatown-International District Urban Center Village and the Central Area Urban Village. In addition the City goals and objectives for the area as outlined in the May 2008 *Livable South Downtown—Draft Land Use Recommendations* articulate a public policy rationale that has merit. These include:
  - *“Facilitate successful region-serving businesses along Dearborn and neighborhood-commercial orientation along Rainier Avenue South.”*
  - *“Future development should reflect Little Saigon’s diversity, including the prominence of Southeast Asian-American businesses.”*
  - *“Allow more commercial uses than areas within Little Saigon, while also allowing (significant increases) to unlimited residential density...”*

We concur that the City will be served by updating the future land use map and the land use code to specifically retain and promote this as an area of regional cultural significance. We also feel agree that increasing opportunities for mixed income housing is a valid public policy objective. These public policy goals combined with the current uses and trends of the area and the fact that all of the parcels are IC (not IG), outside of the MIC and within an Urban Center seem to indicate this may be a likely candidate for a future land use map change.

- However, we recognize that the City is currently engaged in the workplan outlined in the Mayor's 2007 recommendations on industrial land and Council's 2007 Resolution 31026. The guidance, criteria and strategy outlined by those efforts will be very useful when evaluating and making recommendations for future decisions to reclassify industrial land. Because this work is currently underway and scheduled to be completed by December 31, 2008, we recommend that the proposed amendment be deferred until you have the results of the work directed by Council. The Commission has an expectation that this work will be completed and that it will result in clear guidance and criteria for requests to rezone industrial zoned land. Additionally, Resolution 31049 indicates that this proposed amendment be considered “based on the full or partial completion of the pending analysis.” Although there may be merits to this proposal, it is bad practice to let one amendment jump ahead of other similar proposals without the benefit of the findings as outlined in the Council resolution workplan.

***C. Recognize Eligibility for TDR of historic properties within the Pioneer Square Preservation District and the International Special Review District***

**Recommendation: APPROVE**

***D. Remove TDR Sending Site Exclusion Affecting Special Review Districts and Historic Districts***

**Recommendation: APPROVE**

***E. Allow Consideration of Greater Height for TDR Receiving Sites Where Appropriate***

**Recommendation: APPROVE**

***F. Change the Future Land Use Map designation of land within the South Lake Union Urban Center from Industrial to Commercial/Mixed Use***

**Recommendation and Comments: APPROVE**

While this amendment deals with redesignation of industrial zoned land to another use, in this instance we support approval of the amendment into the Comp Plan. The amendment is consistent with the recent designation of South Lake Union as an Urban Center in the City's Comprehensive Plan. An Urban Center designation recognizes the significant growth planned for the neighborhood. In addition, the Comprehensive Plan has targeted 16,000 new jobs and 8,000 new households to be added to the neighborhood between 2004 and 2024.

In addition, the Urban Center designation triggered significant analysis, public involvement and neighborhood planning.

***G. Pedestrian Access at Transit Stops***

**Recommendation and Comments: APPROVE**

The Commission approves the amendment as proposed by the Executive. We note that the original proposed language did cause us concern. We are happy to share more detail if you deem it necessary.

***H. Reduce Trips and Vehicle Miles Traveled in the City***

**Recommendation and Comments: APPROVE**

The Commission approves the amendment as proposed by the Executive. We note that the original proposed language did cause us concern. We are happy to share more detail if you deem it necessary.

We further note that while the Commission recognizes and supports regional efforts to reduce vehicle miles traveled (VMT), there is less evidence that this is an appropriate measure at the city-level, particularly for a city the size of Seattle that is planning for significant increases in growth. We support programs and strategies aimed at reducing greenhouse gas emissions.

***I. Appropriate Density Near Transit Hubs with Incentives and Programs for Affordable Housing.***

**Recommendation and Comments: APPROVE**

The Planning Commission released its affordable Housing Action Agenda this past February. Our year-long effort included independent research, extensive outreach and consensus from stakeholders and a very thorough assessment and gap analysis of housing policies stated in the Comprehensive Plan. Based on that work, the Commission developed a number of additions and improvements to be included in the City's framework policies. Amendments I, J, K and L represent the first series of suggested improvements.

The Commission has worked extensively with departmental and council staff as well as with stakeholders to craft appropriate language that will begin to address the gaps in current city policy. Housing affordability is perhaps the biggest challenge facing City government and the workers of Seattle. These amendments represent a first step in proactively addressing housing affordability in Seattle.

While the language that we submitted was amended by City staff, we believe that the language proposed in the Executive's ordinance achieves its basic intent and we continue to support it.

***J. Coordinate Planning Associated with Subarea Rezones that Significantly Increase Density***

**Recommendation and Comments: APPROVE with revisions**

The Commission proposes alternate language for this amendment:

**“Rezones that would result in significant increases in density should be accompanied by a plan to coordinate public and private investments to address transportation, utilities, open space and other public services to accommodate new growth.”**

The intent of this amendment, which was proposed by the Seattle Planning Commission, is to improve the process of rezoning subareas by establishing a parallel plan that encourages realistic investments in infrastructure and recognizes that private development alone is not likely to provide all of the necessary improvements.

***K. Implement Strategies and Programs to Ensure a Range of Housing Opportunities to Those Who Work in Seattle.***

**Recommendation and Comments: APPROVE**

While the language that we submitted was amended by city staff, we believe that the language proposed in the Executive's ordinance achieves our basic intent and we continue to support it. Ensuring a range of housing opportunities for those who work in Seattle is a very important goal and the proposed language is particularly clear and concise.

***L. Incentive Zoning Policy***

**Recommendation and Comments: APPROVE with revisions**

While the language that we submitted was amended by City staff, we believe that the language proposed in the Executive’s ordinance achieves our basic intent and we continue to support it. However, we suggest the following change to the language submitted by the executive:

**“LU 5.2: Seek opportunities in rezones or changes in development regulations to incorporate incentive programs for development of housing that is affordable.”**

It is our opinion that the phrase ‘for the longest term practical’ does not add any clarification or meaning to the amendment.

***M. and N. Additional Priority Uses for Surplus City Properties***

**Recommendation and Comments: APPROVE**

The Commission approves the amendment as proposed by the Executive. We agree that affordable housing should remain the top priority for the use of surplus City property. We also caution that including too many priorities for use of these properties can result in diluting the effectiveness of the program. However, we support a more flexible approach for use of City surplus land that takes into account a broader set of criteria to determine the appropriate use.

***O. – Q. Anticipating the Effects of Climate Change***

**Recommendation and Comments: APPROVE**

The Commission approves the amendment as proposed by the Executive.

**RECOMMENDATIONS REGARDING 2008 AMENDMENTS NOT RECOMMENDED BY THE EXECUTIVE**

***A. Consolidate Goals and Policies, and Add New Policies, Related to Trees***

**Recommendation and Comments: DO NOT APPROVE**

We agree that this proposed amendment should not be approved. We believe that the intent of the amendment can be accomplished by a change in regulations and does not require a Comprehensive Plan change. The amendment might be better addressed as part of the ‘Urban Forest Management Plan’ and the Department of Planning and Development’s tree regulation review, ‘Keeping the Emerald City Green’.

***B. Prohibit Surface Parking in the Downtown Mixed Residential Zone***

**Recommendation and Comments: DO NOT APPROVE**

We agree that this proposed amendment should not be approved. We support the intent of the amendment that prohibits new surface parking in the DMR. DPD has determined through their initial analysis that a comprehensive plan change is not needed in order to amend the land use code. In this case we encourage them to move forward and begin considering the land use code amendment.

***C. Neighborhood Planning for Areas Not Anticipating Growth***

**Recommendation and Comments: DO NOT APPROVE**

We agree that this proposed amendment should not be approved. One of the underlying premises of the neighborhood planning process is that neighborhoods targeted to accept more growth would be the highest priority for receiving limited city resources for a neighborhood planning process. The neighborhood planning process was created in part so that neighborhoods could help decide the best strategies for managing growth.

***D. Discouraging Extra-heavy Vehicles***

**Recommendation and Comments: DO NOT APPROVE**

We agree that this proposed amendment should not be approved. The Commission concurs with DPD that existing policies T8 and T70 provide appropriate guidance in the Comprehensive Plan to address this matter.

***E. Establish Level-of-Service Standards for Non-motorized Modes***

**Recommendation and Comments: DO NOT APPROVE**

We agree that this proposed amendment should not be approved. We believe that this issue may be better dealt with through another process, such as strategies outlined in the Complete Streets Manual and in the Transportation Strategic Plan.

**FUTURE LANDUSE AMENDMENTS AFFECTING INDUSTRIAL LANDS TO BE DEFERRED UNTIL COMPLETION OF WORK ASSOCIATED WITH THE INDUSTRIAL JOBS INITIATIVE.**

We agree with the Department of Planning and Development that these amendments should be deferred until 2009 after the Industrial Jobs Initiative work has been completed, as noted in our comments regarding item B above. The proposed Future Land Use Map (FLUM) amendments to be deferred include:

- 5. 15th Avenue NW (Nelson Property)
- 6. Harbor Avenue Corridor
- 18. BINMIC (Dravus/Interbay)

**RECOMMENDATIONS REGARDING THE AMENDMENT PROCESS**

Resolution 31016 outlines the Comprehensive Plan Amendment Process that was adopted in 2007. After working through this process for the first time this past year, the Commission would like to suggest potential improvements.

### **Timeline for review**

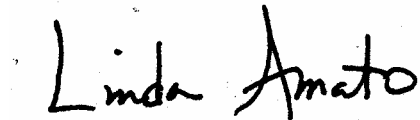
Section 4.E.4. indicates that DPD is supposed to establish a deadline for when other departments and the Planning Commission should submit their comments back to DPD. The resolution stipulates that we provide comment on the amendments to DPD by August 1. The Commission also traditionally provides written recommendations to the Council before the committee takes action. We found the schedule to be challenging for many reasons and would be happy to elaborate as you consider additional process improvement measures.

### **Staff amended proposals**

Section 4.E.1. and E.3. indicate the review and public comment processes for proposed amendments. It is current practice for DPD to amend the text of proposals to make the language appropriate for the Comprehensive Plan while preserving the intent of the proposal. We suggest that the original proposal be retained and the revised staff version of the language be clearly delineated from that of the original proponents' language and certainly not attributed without consent or approval to the original proponent.

We appreciate all of the work done by the Executive, the Council and by a number of citizens, in developing the 2008 Comprehensive Plan Amendments. It is through such collaborative efforts that we ensure Seattle's Comprehensive Plan provides a dynamic policy framework for the future. Thank you for the opportunity to provide comments and we are happy to discuss these recommendations in more detail as you wish. Please contact me or our Director, Barbara Wilson at (206) 684-0431, if you have further questions.

Linda Amato, Chair



Seattle Planning Commission

cc: Mayor Greg Nickels  
Seattle City Councilmembers  
Tim Ceis, Nathan Torgelson, Mayor's office  
Rebecca Herzfeld, Ketil Freeman, Bob Morgan, Council Central Staff  
Diane Sugimura, Ray Gastil, John Skelton, Tom Hauger, Mark Troxel, DPD  
Grace Crunican, Tracy Krawczyk, Barbara Gray, SDOT

#### **SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURE & RECUSAL**

- Commissioner Hough-Beck disclosed that the Port of Seattle is one of her clients at *Hough Beck & Baird Inc.* She noted that the Port of Seattle may have an interest in some of the proposed amendments.
- Commissioner Brower disclosed that his firm, *Tupper Mack Brower PLLC*, represents clients who own industrially-zoned property, though none of their property would be affected by the proposed amendments.
- Commissioner Kaplan disclosed that he is a member of the *Queen Anne Community Council* and has been in numerous meetings about the Dravus rezone proposal and discussions related to item 18.
- Commissioner Leighton disclosed that her firm, *SvR Design*, is working on the pedestrian master plan, which relates to item G.
- Commissioner Eanes recused himself from all matters related to future land use amendments affecting industrial lands. He also recused himself from the matter related to prohibiting new surface parking in the Downtown Mixed Residential zone with both a comprehensive plan amendment and implementing code amendment.