



# City of Seattle Seattle Planning Commission

Barbara Wilson, Executive Director

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January 31, 2011

Honorable Councilmember Sally J. Clark, Chair  
Committee on the Built Environment  
Seattle City Council  
PO Box 34025  
Seattle, WA 98124-4025

## RE: Recommendations on Proposed 2010 Comprehensive Plan Amendments

Dear Councilmember Clark,

The Seattle Planning Commission is an independent and objective volunteer body that advises City officials on broad goals, policies, and plans for the physical development of the city. The Commission is the steward of Seattle's neighborhood plans and the Comprehensive Plan, "Toward a Sustainable Seattle." Offering recommendations on the annual Comprehensive Plan proposals is a mandate of the Commission, and we are pleased to provide you with our comments and recommendations on the proposed 2010 Comprehensive Plan Amendments.

### Purpose of the Seattle Comprehensive Plan

The Comprehensive Plan articulates a vision for how Seattle will accommodate residential and employment growth over the next 20 years, while promoting the values of its citizens, a vibrant economy, and livable neighborhoods.

The Comprehensive Plan was adopted in 1994 to comply with the requirements of the Washington State Growth Management Act. The Plan does this by accommodating most new growth in designated urban centers and urban villages. It contains growth targets for each urban center and urban village related to Seattle's share of regional growth that is anticipated in the coming 20 years. The Plan also includes policies that describe how the City intends to serve this growth through transportation services and other infrastructure.

The Comprehensive Plan is part of a suite of related regional and city plans that include:

- [Vision 2040](#) prepared by the Puget Sound Regional Council (addresses growth in the four-counties of the central Puget Sound region),
- [Countywide Planning Policies](#) (provides guidance to the comprehensive plans of all jurisdictions in King County)
- A series of implementation plans such as [Climate Action Plan](#) and [Transportation Strategic Plan](#) (plans that implement Comp Plan policies related to climate protection and transportation).

## RECOMMENDATIONS ON PROPOSED AMENDMENTS

### A. Marine Cargo Terminal Element

Commission Recommendation & Comments: **APPROVE**

The Commission values the role the marine cargo port plays in the local and regional economy and has long supported land use and other policies that establish a secure future for Seattle's thriving industrial business. The Commission's report *The Future of Seattle's Industrial Lands* recommends the city look for additional ways to strengthen and expand Comprehensive Plan policies to reinforce the commitment to protecting industrial areas in the city. It is worth noting that once again, in a time when the national and regional economy is struggling industrial business in Seattle acts as stabilizing factor. 2010 was a record year for container traffic, a metric that illustrates Seattle's importance in the 21<sup>st</sup> century global marketplace as an importer and exporter of goods.

We support the proposed new element, which is required by state law. We have discussed non-substantive revisions to the proposed element with DPD staff and will continue to work with Council Central staff to refine, clarify and finalize the language of this important new element of the Comprehensive Plan.

### B. Vehicle Miles Traveled Reduction Targets

Commission Recommendation & Comments: **HOLD for next cycle**

The Commission supports Seattle's goal to become carbon neutral and to reduce greenhouse gas (GHG) emissions. We recognize the importance of addressing global climate change and urge Council to allow the Climate Action Plan--which will be updated later this year--to act as the road map for achieving this critical goal, rather than adopting specific targets for reducing vehicle miles traveled (VMT) as a means of reducing carbon emissions.

We understand that the Office of Sustainability and the Environment is completing a scientific and methodologically sound analysis that will result in metrics specific to Seattle and that place VMT reduction in an appropriately broader context. We see the reduction of carbon emissions through reduced per capita VMT as one strategy within a rational analytical framework for achieving overall carbon reduction goals. Upon completion of the analysis by OSE, specific metrics should be adopted into implementing documents such as the Climate Action Plan and Transportation Strategic Plan.

In 2008, Transportation Policy 17 was amended to link reductions in VMT to reductions in greenhouse gas emissions. Since that time, the Office of Sustainability and the Environment has been working to update the Climate Action Plan. While targets for reducing VMT will be a necessary component of the Action Plan, reductions in per capita VMT alone are not a sufficient measure of sustainability. As an example, while per capita GHG emissions decreased in all sectors from 1990-2008, overall emissions increased in the transportation sector during this time. It is not unrealistic to imagine a scenario in which per capita VMT is reduced, yet overall GHG emissions from the transportation sector increase. This is why VMT reductions should be addressed contextually, as one of many strategies that Seattle will employ to become a carbon-neutral city, rather than taken in isolation. This is also part of the reason Commission continues to caution against adopting specific metrics into the Comprehensive Plan.

We recommend against adopting the proposed 'placeholder' language knowing that the City intends to revisit the issue within a year using science based, methodologically sound analysis currently being conducted by OSE and DPD. If Council adopts another policy related to per capita reductions in VMT

this year, we propose the following new environment policy. This policy would be more appropriate for the framework level of the Comprehensive Plan than specific metrics that isolate VMT from the true context how we must address global climate change.

**SPC Proposed alternative language**

***New Environment Policy: Seattle will act as a regional and national leader by becoming carbon neutral by 2050. The Climate Action Plan will identify the strategies for reducing greenhouse gas emissions in the transportation, building energy, and waste sectors.***

**C. Planned Action Community**

Commission Recommendation & Comments: **APPROVE**

The Commission supports this approach as an effective implementation tool for large redevelopment projects. We will continue to work closely with City staff as specific details of this mechanism are developed. If this approach is used for the Yesler Terrace Redevelopment we urge you to consider a robust design review approach that clearly articulates a vision for the long-term development of this area, recognizing that it will profoundly impact Seattle's Center City.

**D. North Beacon Hill Neighborhood Plan Update**

**E. North Rainier (aka Mt Baker) Neighborhood Plan Update**

**F. MLK @ Holly (aka Othello) Neighborhood Plan Update**

Commission Recommendation & Comments: **APPROVE**

The Commission continues to support the proposed changes to these neighborhood plans and the Future Land Use Map. We are working closely with City staff as they develop and finalize the Urban Design Frameworks that will help implement these neighborhood plans. We commend the neighborhood plan team's sustained and remarkable outreach to these communities.

As all three of these neighborhoods defined as transit communities, in future amendment cycles, we urge Council and DPD to propose and adopt future land use map changes that will allow for zoning, development, and design policies and regulations consistent with the Planning Commission's report: *Seattle Transit Communities - Integrating Neighborhoods with Transit.*

**G. Boundary Expansion for the 23rd @ Jackson Residential Urban Village**

Commission Recommendation & Comments: **APPROVE**

The Commission supports the proposed expansion of this residential urban village boundary.

Thank you for the opportunity to provide you with our recommendations on the 2010 Comprehensive Plan amendments. Please contact me or our Director, Barbara Wilson at (206) 684-0431 if you have further questions.

Sincerely,



Josh Brower, Chair  
Seattle Planning Commission

cc: Mayor Mike McGinn  
Seattle City Councilmembers  
Diane Sugimura, Marshall Foster, Tom Hauger, Nora Liu, Lyle Bicknell; Department of Planning and Development  
Peter Hahn, Tracy Krawczyk, Barbara Gray, Jemae Hoffman; Seattle Department of Transportation  
Jill Simmons, Tracy Morgenstern, Sara Wysocki; Office of Sustainability and the Environment  
Steve Johnson, Brian Surratt, Roque Deherrera; Office of Economic Development  
Rick Hooper, Office of Housing  
Bernie Matsuno, Veronica Sherman-King; Department of Neighborhoods  
Darryl Smith, Ethan Raup, Doris Koo; Liz Birkholz; Becca Deehr; Mayor's office  
Rebecca Herzfeld, Ketil Freeman; Council Central Staff

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

**A. Marine Cargo Terminal Element**

- Commissioner Josh Brower disclosed that his firm, Brower Law, represents clients that own property in industrial areas.
- Commissioner Colie Hough-Beck disclosed that her firm, HBB, has contracts with the Port of Seattle.
- Commissioner Mark Johnson disclosed that his firm, Environmental Science Associates, has contracts with the Port of Seattle.
- Commissioner Jeanne Krikawa disclosed that the SODO Business Association is currently one of her clients.

**C. Planned Action Community**

- Commissioner Josh Brower disclosed that he is on the board of Elder Health Northwest, which has an interest in the redevelopment of Yesler Terrace.
- Commissioner David Cutler disclosed that his firm, GGLO, is working with SHA on the redevelopment of Yesler Terrace.

**D., E., and F. neighborhood plan updates**

- Commissioner Josh Brower disclosed that his firm, Brower Law, represents clients that own property within the neighborhood planning areas and that he lives on Beacon Hill.
- Commissioner Kadie Bell disclosed that she represented Public Health on the neighborhood planning interdepartmental team.
- Commissioner Catherine Benotto disclosed that her firm, Weber Thompson, might do work for clients on projects within the proposed neighborhood planning areas
- Commissioner David Cutler disclosed that his firm, GGLO, might do work for clients on projects within the proposed neighborhood planning areas.
- Commissioner Colie Hough-Beck disclosed that her firm, HBB, might do work for clients on projects within the proposed neighborhood planning areas.
- Commissioner Marty Kaplan disclosed that his firm, Martin Henry Kaplan, Architects AIA, might do work for clients on projects within the proposed neighborhood planning areas.
- Commissioner Brad Khouri disclosed that his firm, b9 architects, designs and develops single and multifamily housing in Seattle and may work for clients on projects within the proposed neighborhood planning areas.
- Commissioner Leslie Miller disclosed that she is a voting member of the Southeast District Council for the Rainier Othello Safety Association, on the steering committees of Othello Station Community Advisory Team and Othello Park Now, on the Neighborhood Advisory Committee for the Othello Playground and Lighting Improvements, a member of the Othello Park Alliance and South Precinct Advisory Council, a proponent for Othello 2011 funded Bridging the Gap Project, and a MLK @ New Holly Neighborhood Advisory Committee Member. Commissioner Miller also disclosed that her firm, Girl Friday Productions, has a current contract with the Office of Sustainability and the Environment.