



City of Seattle

Seattle Planning Commission

July 12, 2021

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

RE: 2021-2022 Comprehensive Plan Amendments

Dear Councilmember Strauss,

The Seattle Planning Commission is pleased to provide our comments and recommendations on which proposed 2021-2022 Comprehensive Plan amendments should be placed on the docket for further analysis. Our recommendations are offered as stewards of the Seattle Comprehensive Plan and based on the application of Council-adopted criteria, Guidelines for Amendment Selection, included in Resolution 31807 (Attachment A).

The Planning Commission recommends moving forward the following amendment proposals to the docket for further analysis:

1. Florentia Street

The applicant is proposing to reclassify West Florentia Street (between 3rd Avenue North and Queen Anne Avenue North) and Florentia Street (between Queen Anne Avenue North and Nickerson Street) in the Queen Anne neighborhood as non-arterial streets.

The Commission recommends this proposal for the docket. The proposal meets the criteria and as such warrants further study. Arterial streets and non-arterial streets are included on the Comprehensive Plan's Transportation Appendix Figure A-1 map. Also, per docketing criterion F, this amendment is likely to make a material difference in a future City regulatory or funding decision, as this reclassification would influence future City budgetary decisions on physical improvements to the street.

The Planning Commission recommends the following amendment proposals not move forward to the docket for further analysis:

Commissioners

Rick Mohler, *Co-Chair*
Jamie Stroble, *Co-Chair*

Mark Braseth

McCaela Daffern

Roque Deherrera

David Goldberg

Matt Hutchins

Patience Malaba

Radhika Nair

Alanna Peterson

Dhyana Quintanar

Julio Sanchez

Lauren Squires

Kelabe Tewolde

Rose Lew Tsai-Le Whitson

Staff

Vanessa Murdock
Executive Director

Olivia Baker
Policy Analyst

John Hoey,
Senior Policy Analyst

Robin Magonegil
Administrative Analyst

Future Land Use Map (FLUM) Amendments

2. 9201-9215 3rd Avenue SW

The applicant is proposing to amend the FLUM designation of these parcels from Single-Family Residential to Multi-Family Residential.

The Commission does not recommend this proposal for the docket citing criterion G, which states “an amendment that proposes to change the FLUM is not necessary and will not be considered when it would affect an area that is less than a full block in size and is located adjacent to other land designated on the FLUM for a use that is the same as – or is compatible with – the proposed designation.” These parcels are in a Single-Family Residential area and are less than a full block. All adjacent parcels are also designated on the FLUM as Single-Family Residential.

3. 1511-1551 W Armory Way

The applicant is proposing to amend the FLUM designation of these parcels from Ballard-Interbay-Northend Manufacturing/Industrial Center to Commercial/Mixed Use.

The Commission does not recommend this proposal for the docket citing criterion B5, which states that it would be “better addressed through a budgetary or programmatic decision or another process, such as activities identified in departmental work programs under way or expected in the near future, within which the suggested amendment can be considered alongside other related issues.” In this case, the appropriate process would be the ongoing work of the Mayor’s Industrial and Maritime Strategy.

Text Amendments

4. Setbacks and Trees

The applicant is proposing to amend the Land Use Element policies related to building setbacks and yards to allow for preservation and planting of trees.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal has been previously submitted and rejected. It was previously submitted and docketed in the 2017-2018 cycle but was not adopted by the City Council in 2018. The rationale for not adopting this proposal was that much of the proposed language is inconsistent with existing Comprehensive Plan policies or misunderstands the more general policy level at which the Plan operates. This proposal was most recently submitted and not docketed in the 2020-2021 cycle. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

5. Skybridges, Trams and Tunnels

The applicant is proposing to amend the Transportation Element to add a policy that discourages pedestrian grade separations, including skybridges, trams and tunnels.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal has been previously submitted and rejected. It was previously submitted and docketed in the 2012-2013 cycle but was not adopted by the City Council in 2013. The rationale for not adopting this proposal was pedestrian grade separations are addressed in the Seattle Municipal Code and those regulations are consistent with the general policy intent of the Comprehensive Plan. This proposal was most recently submitted and not docketed in the 2020-2021 cycle. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

6. Open and Democratic Government

The applicant is requesting to add an Open and Democratic Government Element to the Comprehensive Plan.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal has been previously submitted and rejected. It was originally proposed as “Open and Participatory Government” in the 2008-2009 amendment cycle but was not docketed citing criteria that the content proposed in the application are best dealt with through the Seattle Municipal Code, the Seattle Ethics Code, or through budgetary and programmatic decision-making. This proposal was most recently submitted and not docketed in the 2020-2021 cycle. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

7. Heavy Vehicles

The applicant is proposing to amend the Transportation Element to reduce road and bridge damage from heavy vehicles.

The Commission does not recommend this proposal for the docket citing criteria D. This proposal has been previously submitted and rejected. It was originally proposed in the 2016-2017 amendment cycle but was not docketed citing criteria that it would be better addressed through another process, specifically the Seattle 2035 Comprehensive Plan update. This proposal was most recently submitted and not docketed in the 2020-2021 cycle. There is insufficient evidence that relevant circumstances have changed significantly to warrant reconsidering this proposal.

Previously Docketed Amendments

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 as part of the 2020-2021 annual amendment cycle:

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

At the time the proposed West Seattle Bridge amendments were docketed, the closure of the West Seattle 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. The need to amend the Comprehensive Plan to identify mitigation related to the closure was determined to be unnecessary. The City Council originally proposed impact fee amendments but has not taken any additional action to pursue these amendments. The Office of Planning and Community Development (OPCD) has stated that the remaining three amendments above (Single-Family areas, South Park Urban Village, and fossil fuels) could be more appropriately addressed through the next Major Update to the Comprehensive Plan, with the rationale that these issues would require a bigger change to the Plan outside of the scope of the annual amendments. The Planning Commission has concerns about waiting until the next Major Update of the Comprehensive Plan in 2024 for consideration of these proposed amendments and encourages the City Council to move forward on them sooner where appropriate. We would like to call your attention to the Commission's specific comments on one of these docketed amendments below.

Alternative Name for Single-Family Zones

As we noted in our docket recommendation letter last year, the City Council proposed an amendment that would recommend an alternative name for Single-Family zones, such as Neighborhood Residential, and amend the Land Use Element of the Comprehensive Plan to implement this change. 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 including funding

to analyze a variety of housing types in Single-Family zones in the Environmental Impact Statement (EIS) on the Major Update to the Comprehensive Plan. We look forward to providing our input on this subject throughout the process to update the Comprehensive Plan. In the meantime, the Commission recommends moving the effort to rename Single-Family zoning forward sooner than the beginning of the Major Update.

We appreciate the opportunity to review amendments for docket setting and provide our recommendations. If you have any questions, please do not hesitate to contact us or our Executive Director, Vanessa Murdock, at vanessa.murdock@seattle.gov

Sincerely,

The image shows two handwritten signatures in black ink. The signature on the left is for Rick Mohler, and the signature on the right is for Jamie Stroble. Both signatures are stylized and cursive.

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

cc: Mayor Jenny Durkan
Seattle City Councilmembers
Lish Whitson, Eric McConaghy; Council Central Staff
Rico Quirindongo, Michael Hubner; Office of Planning and Community Development

ATTACHMENT A

City of Seattle Criteria for Comprehensive Plan Amendment Selection (from Resolution 31807)

- A. The amendment is legal under state and local law.
- B. The amendment is appropriate for the Comprehensive Plan because:
1. It is consistent with the role of the Comprehensive Plan under the State Growth Management Act;
 2. It is consistent with the Countywide Planning Policies and with the multi-county policies contained in the Puget Sound Regional Council's regional growth strategy;
 3. Its intent cannot be accomplished by a change in regulations alone;
 4. It is not better addressed as a budgetary or programmatic decision; and
 5. It is not better addressed through another process, such as activities identified in departmental work programs under way or expected soon, within which the suggested amendment can be considered alongside other related issues.
- C. It is practical to consider the amendment because:
1. The timing of the amendment is appropriate, and Council will have sufficient information to make an informed decision;
 2. City staff will be able to develop within the time available the text for the Comprehensive Plan and, if necessary, amendments to the Seattle Municipal Code, and to conduct sufficient analysis and public review; and
 3. The amendment is consistent with the overall vision of the Comprehensive Plan and well-established Comprehensive Plan policy, or the Mayor or Council wishes to consider changing the vision or established policy.
- D. If the amendment has previously been proposed, relevant circumstances have changed significantly so that there is sufficient cause for reconsidering the proposal.
- E. If the amendment would change a neighborhood plan, there is evidence that proponents of the amendment, or other persons, have effectively communicated the substance and purpose of the amendment with those who could be affected by the amendment and there is documentation provided of community support for the amendment.
- F. The amendment is likely to make a material difference in a future City regulatory or funding decision.
- G. A proposal that would change the boundary of an urban center, urban village, or manufacturing/industrial center requires an amendment to the Future Land Use Map (FLUM), regardless of the area's size. However, an amendment that proposes to change the FLUM is not necessary and will not be considered when it would affect an area that is less than a full block in size and is located adjacent to other land designated on the FLUM for a use that is the same as – or is compatible with – the proposed designation.